



TITLE VI COMPLIANCE REPORT & IMPLEMENTATION PLAN

FISCAL YEAR 2017-2018

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I. OVERVIEW

THDA's Mission is "Leading Tennessee home by creating safe, sound affordable housing opportunities."

The Tennessee Housing Development Agency (THDA) is a political subdivision of the State of Tennessee, created by the Tennessee General Assembly in 1973 through the enactment of TCA 13-23-101, et seq. THDA is the State's housing finance agency (HFA), responsible for selling tax exempt mortgage revenue bonds to offer affordable mortgages to homebuyers of low- and moderate-incomes through local lenders. THDA also sells tax exempt multifamily housing bonds to provide financing for low income multifamily housing development through the Tax Exempt Multi-Family Bond Authority Program. The Low Income Housing Tax Credit provides a credit against federal income tax liability each year for 10 years for owners and investors in low-income rental housing. As part of the 2013 National Mortgage Settlement with the nation's largest servicers, Tennessee's Attorney General allocated funding for THDA's Foreclosure Prevention Program, which funds nonprofit agencies across the state to provide free and confidential counseling services for Tennesseans facing financial difficulties that may lead them to default and foreclosure.

In addition to the programs supported by tax exempt bonds, tax credits and other non-federal sources, THDA administers various housing and housing-related programs targeted to households of very low-, low- and moderate-incomes that are funded through Federal financial assistance. The Section 8 Housing Choice Voucher Program is federally funded through the Department of Housing and Urban Development (HUD) where THDA directly administers rental and utility assistance payments to very low income households. The Section 8 Project Based Rental Assistance Contracts program is a federally funded program where HUD has contracted with THDA to monitor certain components of the program. The HOME Investment Partnership, Emergency Solutions Grant (ESG), and National Housing Trust Fund (NHTF) are all housing programs funded by HUD where THDA contracts with sub-recipients for administration. The Weatherization Assistance Program (WAP) is funded federally through the Department of Energy, while the Low Income Home Energy Assistance Program (LIHEAP) is funded through the Department of Health and Human Services (DHHS). THDA contracts with sub-recipients to administer both programs.

THDA also currently administers the temporary Hardest Hit Fund (HHF) Downpayment Assistance (DPA) program and the Keep My Tennessee Home (KMTH) Principal Reduction Recast Program with Lien Extinguishment (PRRPLE) & Reinstatement Only Programs (ROP) with stimulus federal funding through the Troubled Asset Relief Program (TARP). The HHF DPA programs are directly administered by THDA through cooperation with the Great Choice lending network, while the KMTH programs are administered through sub-recipient loan servicers.

A brief description of each program with federal financial assistance is contained in Table 2, in Section III, Federal Programs or Activities. Program descriptions of each and detailed policy information is available on THDA's website at www.thda.org.

THDA is governed by a 15-member board of directors. The Governor appoints six board members, who are citizens of the state, who do not hold public office, and who represent the following groups: retail building material supply, manufactured housing, home building, mortgage banking, licensed real estate brokers, local public housing authorities, local government and qualifying non-profits. The Governor also appoints one Board member from the public at large who is knowledgeable about the problems of inadequate housing conditions in Tennessee, and one participant in the Section 8 Housing Choice Voucher Program. The Speaker of the State Senate and the Speaker of the State House of Representatives each appoints one Board member, each of whom must be a citizen of the state, not hold public office and be knowledgeable about the problems of inadequate housing conditions in Tennessee. The Comptroller of the Treasury, the Secretary of State, the State Treasurer, the Commissioner of the Department of Finance and Administration, and a Staff Assistant to the Governor serve ex officio. The board is composed of 43 percent female and 29 percent minority members. Detailed information on the members of THDA's Board of Directors, their representation, their committee assignments and their race and gender are reported in Appendix A.

II. RESPONSIBLE OFFICIALS

An organizational chart of the THDA Executive Team and the reporting structure is provided in Appendix B. The Executive Team is comprised of the Executive Director, Ralph Perrey, and four Executive Officers. More information regarding THDA, its Board of Directors, program operating policies and organizational structure may be found on THDA's website at www.thda.org. The Executive Director and Civil Rights Compliance Advisor, Laura Swanson, are the responsible officials for the Plan, with guidance from the THDA Office of Legal Counsel. The address of the responsible officials is: Andrew Jackson Building, Third Floor, 502 Deaderick St., Nashville, TN 37243.

III. DEFINITIONS

The below table defines common abbreviations and terms used in this report and in programs administered by THDA. The purpose of presenting these definitions is to ensure agency staff, recipients and beneficiaries have access to consistent and applicable definitions.

Table 1
Acronyms and Definitions

ACS	American Community Survey – An ongoing statistical survey that samples a small percentage of the population every year -- giving communities the information they need to plan investments and services.
AMI	Area Median Income - The median divides the income distribution into two equal parts: one-half of the cases falling below the median income and one-half above the median. [Census 2000 Summary File 3 Technical Documentation. Prepared by the U.S. Census Bureau, 2002.] HUD uses the median income for families in metropolitan and non-metropolitan areas to calculate income limits for eligibility in a variety of housing programs. The area median income is also utilized when determining allowable rents in the Low Income Housing Tax Credit Program.
ARLP	The Appalachian Renovation Loan Program help provide safe and sound housing to residents in the most Distressed and At-Risk counties of Tennessee through loans for <i>repairs or improvements</i> . The program is funded through federal funds received by the Appalachian Regional Commission (awarded to THDA) combined with funds from the Tennessee Housing Trust Fund.
ARRA	Commonly referred to as the Stimulus or The Recovery Act , was an economic stimulus package enacted by the 111th United States Congress in February 2009 and signed into law on February 17, 2009. To respond to the Great Recession, the primary objective for ARRA was to save or quickly create jobs. Secondary objectives were to provide temporary relief programs for those most impacted by the recession and invest in infrastructure, education, health, and renewable energy.
CAPER	Consolidated Annual Performance Evaluation Report – The CAPER is an evaluation and performance report required by the Department of Housing and Urban Development (HUD).
CDBG	Community Development Block Grant – A flexible program that provides communities with resources to address a wide range of unique community development needs. The CDBG program provides annual grants on a formula basis to 1,209 general units of local government and States.
CHAS	Comprehensive Housing Affordability Strategy – Data that demonstrate the extent of housing problems and housing needs, particularly for low income households.
CHDO	Community Housing Development Organization – A private nonprofit, community-based service organization whose primary purpose is to provide and develop decent, affordable housing for the community it serves.

CoC	Continuum of Care – The CoC is designed to promote community-wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.
CP	Community Programs – A THDA division that administers a variety of housing programs supported through federal, state and THDA funding. The Division awards grants to local governments and non-profit agencies to meet the housing needs of low income Tennesseans.
DOE	US Department of Energy - A cabinet department in the Executive branch of the U.S. federal government policies regarding energy and safety in handling nuclear material.
ESG	Emergency Shelter Grant - A HUD funded grant program that provides funds to engage homeless individuals and families living on the street; improve the number and quality of emergency shelters for the homeless; provide essential services to shelter residents and rapidly re-house homeless individuals and families.
FSS	The Family Self-Sufficiency Program facilitates access to the supportive services that families need to become free of public assistance in a five-year time period.
Great Choice	Great Choice Programs - The Great Choice Mortgage Loan Program offers 30-year, fixed rate mortgages to qualified first-time, repeat and military veteran homebuyers. The Great Choice Plus Program Great Choice Plus is a 0% interest, deferred, second mortgage to provide homebuyers with down payment assistance up to 5% of the purchase price of the home. Both programs are funded through the sale of Mortgage Revenue Bonds (MRB).
HAP	Housing Assistance Payment – Section 8 tenant-based assistance under the housing choice voucher program (voucher program) of the U.S. Department of Housing and Urban Development (HUD).
HBEI	Homebuyer Education Initiative – THDA’s initiative to create first-time homebuyers who are better prepared for the responsibilities of homeownership.
HCV	Housing Choice Voucher Program – The HCV program is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants are able to find their own housing, including single-family homes, townhouses and apartments.
HERA	Housing and Economic Recovery Act of 2008 – Designed primarily to address the subprime mortgage crisis. It authorized the Federal Housing Administration to guarantee up to \$300 billion in new 30-year fixed rate mortgages for subprime borrowers if lenders write-down principal loan balances to 90 percent of current appraisal value. States are authorized to refinance subprime loans using mortgage revenue bonds.
HFA	Housing Finance Agency – State Housing Finance Agencies are state-chartered authorities established to help meet the affordable housing needs of their states’ residents. Through partnerships with the private and public sector, the agencies

	provide housing for people of low or moderate means. THDA is Tennessee's state housing finance agency.
HHF	The federal government created the Hardest Hit Fund to help homeowners in certain states affected by the most recent housing and economic downturns. The temporary program is funded through ARRA (Stimulus or The Recovery Act).
HHF BEP	The Hardest Hit Fund Blight Elimination Program assists with the removal of blighted properties in targeted areas within Tennessee. THDA will work in partnership with approved non-profit partners to strategically target residential single-family properties for demolition, site improvement, and acceptable reuse.
HHF DPA	The Hardest Hit Fund Down Payment Assistance program is available to Great Choice borrowers who purchase a home in a neighborhood that was hardest hit in the economic downturn and is recovering more slowly than other areas across the state.
HHF KMTH (PRPLE & ROP)	The Keep My Tennessee Home program is funded by the federal Hardest Hit Fund. The program includes the Principal Reduction with Recast Program or Lien Extinguishment and the Reinstatement Only Program. PRPLE lowers monthly mortgage payments to affordable levels for eligible homeowners by providing (i) a reduction in the principal balance of their first mortgage loan, combined with a loan recast or modification, or (ii) principal reduction which results in a full lien extinguishment. ROP provides assistance to homeowners who have fallen behind on their mortgage loans and are in imminent danger of losing their home to foreclosure due to a qualified hardship that occurred after they acquired their home.
HHS	US Department of Health & Human Services – A cabinet department in the Executive branch of the United States federal government with the goal of protecting the health of all Americans and providing essential human services.
HRA	Human Resource Agency – Agencies that provide services for improving the health, well-being, and economic opportunities of people needing critical support or of those who may have an immediate need.
HTF	Tennessee's Housing Trust Fund Program (HTF) is financed by revenue from the (Great Choice) mortgage loan program and targets assistance to persons of low and very low income through several initiatives. (1) Appalachian Renovation Loan Program (home repair program in 31 counties). (2) Competitive Grants Program, which supports rental housing activities for households at or below 80% of area median income. (3) Emergency Repair Program allocates funds for repair to essential systems of homes for elderly or disabled homeowners. (4) Housing Modification and Ramp Program provides funding to United Cerebral Palsy of Middle Tennessee to construct ramps and make other home modifications to assist persons with disabilities. (5) Habitat for Humanity of Tennessee program allocates funds to provide construction funding to local affiliates for new construction of single family homes. (6) Rebuild & Recover Disaster Program provides funds to city or county governments to assist eligible communities recover from a natural disaster. (7) THDA Challenge Grant Program provides initial seed funding to support the fundraising efforts of nonprofit organizations across Tennessee to implement housing activities that represent unique milestones, are part of a broad community initiative, or are part of a significant expansion of work outside the normal day to day activities of the organization.

HUD	US Department of Housing and Urban Development – A cabinet department in the Executive branch of the United States federal government. HUD’s mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. HUD helps people by administering a variety of programs that develop and support affordable housing, including public housing programs and homeownership programs. HUD also seeks to protect consumers through education, Fair Housing Laws, and housing rehabilitation initiatives.
IRS	Internal Revenue Service – the U.S. government agency responsible for tax collection and tax law enforcement.
LIHTC	The Low Income Housing Tax Credit Program offers owners and investors of affordable rental housing a reduction in federal income tax liability over a period of 10 years. The IRS allocates tax credit authority to states on a calendar year basis. Tennessee does not receive actual dollars, but instead receives tax credit authority that is allocated in both competitive (9% credit) and non-competitive (4%) awards.
MRB	THDA sells tax-exempt mortgage revenue bonds in the private market to raise capital to finance the mortgage loan program, which in turn allows low- and moderate-income households to purchase their first home with a below-market interest rates making the homeowners’ monthly payments more affordable.
MFB	THDA authorizes the allocation of Multifamily Tax-Exempt Bond Authority to local issuers for multifamily developments. Bonds must be issued by a local board or other issuing entity with jurisdiction in the area of the proposed development.
NHTF	The National Housing Trust Fund is an affordable housing production program that will complement existing Federal, state and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low- and very low-income households, including homeless families.
PHA	Public Housing Agency – Organization created by local or state governments to administer HUD's Low-Income Public Housing, Section 8 Housing Choice Voucher and other HUD programs.
RP	Research and Planning – THDA’s Research and Planning division.
S8CA	Section 8 Contract Administration – A THDA division that administers the Section 8 Project Based Rental Assistance program.
S8RA	Section 8 Rental Assistance – A THDA division that administers the Section 8 Housing Choice Voucher program.

IV. NON-DISCRIMINATION POLICY

THDA has adopted the “Tennessee Housing Development Agency (THDA) Non-Discrimination in Provision of Services Policy,” which is included as Appendix C of this document. This agency-wide policy was developed to include all program divisions and partners of the agency in providing services to the public. The policy states: “No staff person or partner of THDA shall engage in discriminatory practices” and the intent of the policy is to provide guidance to THDA staff in preventing discrimination on the basis of race, color, religion, national origin, sex, familial status, disability and “any other class protected under state or federal law in providing services to the public.”

The policy also provides guidance in regards to contracts between THDA and sub-recipients of THDA’s federal financial assistance. It states that “every contract to provide funding for services through THDA partners shall include language in the contract that establishes an affirmative obligation to not discriminate against any individual on the basis of that individual’s membership in a class that is protected by the policy. An employee who fails to comply with the policy or encourages such conduct by others is subject to corrective action in accordance with THDA’s Progressive Discipline Policy. Any partner who fails to comply with contractual obligations to not discriminate may face loss of funding or other consequences as outlined in its contract with THDA.

The authority for THDA to conduct compliance reviews for programs that receive federal financial assistance is derived from Title VI of the Civil Rights Act of 1964 and its’ implementing regulations. Public Chapter 502 of the Public Acts of 1993 requires state agencies to develop an implementation plan for the enforcement of Title VI. THDA, along with its sub-recipients and contractors, shall make available any Title VI compliance report to be reviewed by THRC upon request.

Additionally, the majority of THDA’s programs are housing programs subject to Title VIII of the Civil Rights Act of 1968 (the “Fair Housing Act”), which makes it unlawful to refuse to sell, rent to, or negotiate with any person because of that person's inclusion in a protected class (race, color, disability, religion, sex, familial status, or national origin). THDA also may have authority to conduct compliance monitoring for some programs under the Fair Housing Act. Programs with federal financial assistance may be subject to both Title VI and Fair Housing Act compliance monitoring.

V. ORGANIZATION OF THE CIVIL RIGHTS OFFICE

Two THDA staff members are responsible for the oversight of Title VI compliance with one of the two staff members responsible for the research and compilation of the Title VI Implementation Plan annually. Each of these two staff members and their duties, as they relate to THDA and Title VI compliance, are described below.

Laura Swanson, Civil Rights Compliance and Housing Strategy Advisor, is the Title VI Coordinator for THDA. Ms. Swanson is responsible for providing agency leadership to meet our civil rights obligations in relation to Title VI and Title VIII (“Fair Housing Act”) of the U.S. Civil Rights Acts. In addition to working with THDA divisions to gather information, research statistical information, compile and submit the THDA’s Title VI compliance procedures and plan, her primary duties include the following:

- Review fair housing and civil rights related activities conducted by the staff for compliance and report to program divisions and THDA’s Executive team for further implementation of changes in processes and policies.
- Prepare and/or coordinate Title VI and Fair Housing training opportunities for THDA staff on an annual basis.
- Prepare and/or coordinate Title VI and Fair Housing training opportunities for THDA sub-recipients, along with establishment and oversight of an annual Title VI self-assessment process.
- Work internally with Legal and Internal Audit and externally with THRC and HUD to manage discrimination complaints under Title VI, Fair Housing and Section 504 in accordance with THDA procedures.
- Cultivate relationships with existing partners through participation in fair housing organizations, THDA advisory boards and the Tennessee Affordable Housing Coalition.
- Work with the Chief Strategy Officer and the Director of Research and Planning to coordinate, track and report the fair housing activities associated with the Consolidated Plan.
- Coordinate internal and external efforts to support and grow the utilization of TN Housing Search.org, the state’s free housing search engine, especially with agencies and non-profits who serve special needs populations & during disaster recovery efforts.
- Work with the Chief Strategy Officer and the Director of Research and Planning to establish and maintain progress measures for THDA’s strategic plan.

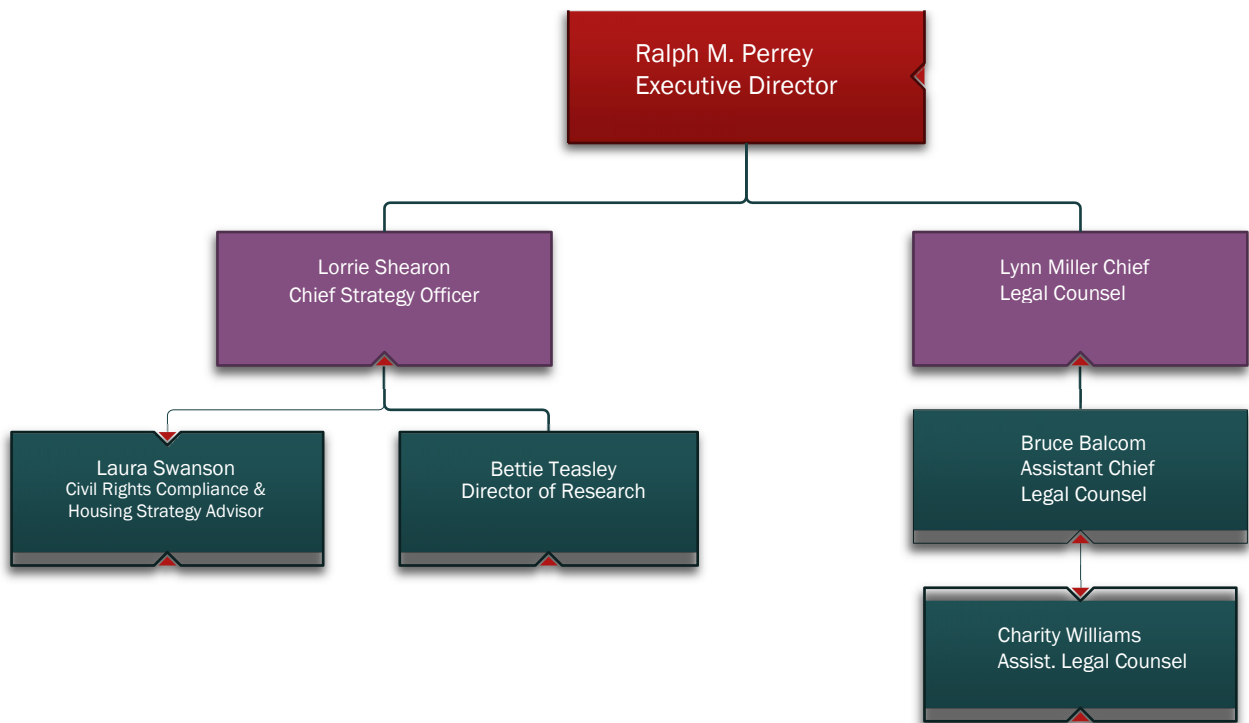
Charity Williams, Assistant Chief Legal Counsel for THDA, is responsible for Title VI legal services. In addition to her Title VI duties, she serves, under the supervision of THDA’s Chief Legal Counsel, as the primary legal counsel for the Section 8 Rental Assistance and Section 8 Contract Administration divisions. Her primary duties that may involve Title VI or Fair Housing compliance include:

- Interpreting federal and state legislation and regulations relating to the organization.
- Aiding in the preparation of handbooks and instructional memoranda for program operations to meet federal and state requirements.

- Counseling the organization regarding legal rights and responsibilities, including working with the Title VI Coordinator to appropriately review and refer or respond to Title VI and Fair Housing complaints.
- Drafting and reviewing documents used with the organization's programs.
- Advising on questions of law involved in the operation of the organization.
- Working with the Attorney General's office and private attorneys on litigation.
- Representing the organization in administrative hearings and certain trial courts.
- Manages 504 requests for accommodation.

In addition to the two staff members directly involved with Title VI and Fair Housing activities on a daily basis, THDA's Internal Audit division assists with the investigation of Title VI and Fair Housing complaints.

The organizational chart below shows the position of each THDA staff person associated with Title VI Compliance.



VI. DISCRIMINATORY PRACTICES

Because THDA is an affordable housing finance agency, compliance with non-discrimination laws is integral to the housing activities carried out by the organization. While only those programs funded through Federal financial assistance are subject to enforcement under Title VI of the Civil Rights Act of 1964, all of THDA's housing-related programs are subject to Title VIII of the Civil Rights Act of 1968, also known as the Fair Housing Act. Thus, examples of possible discriminatory practices relate to housing activities, such as the examples below.

- Refusing to sell, rent or lease housing to an interested tenant or buyer
- Applying different sale, rental or occupancy terms for different people
- Lying about or misrepresenting the availability of housing
- Providing inferior conditions, terms, facilities or privileges in connection with housing
- "Blockbusting" or encouraging people to leave an area based on their protected class
- Steering clients to a certain neighborhood, refusal to serve certain clients
- Redlining or limiting lending in a particular area because of the demographics of that area or imposing different conditions on a loan
- Harassing tenants and homeowners in connection with housing accommodations
- Zoning laws that have an unfair effect on protected classes

Examples:

An example of a possible discriminatory practice by a THDA employee working in a program where THDA directly administers federal funds may be found in the Housing Choice Voucher Program. A person with a disability may request a reasonable accommodation necessary to allow the person reasonable and equal opportunity to use and enjoy a dwelling unit assisted through the HCV program. If an accommodation request is denied without appropriate review or cause, it would represent a possible discriminatory practice.

A specific example of a possible discriminatory practice by a THDA sub-recipient may be found in the HOME homeowner rehabilitation program. If ten families receive homeownership rehabilitation, and nine of those families are White and one is Black/African American, all should receive the same quality of rehabilitation. If the beneficiary belonging to a protected class receives sub-standard repairs below specifications and the non-minority homeowners all receive standard repairs at specification, discrimination on the basis of Title VI could be alleged.

VII. FEDERAL PROGRAMS OR ACTIVITIES

Table 2 includes the Federal financial assistance that was allocated to THDA during FYE2018 along with a description of program activities supported by the Federal funding.

Table 2
Program Description & Federal Financial Assistance, FY 2017-2018

Program	Program Description	Source	Federal Funds
<i>Federally Funded Programs; THDA Direct Administrator</i>			
Section 8 Tenant Based Housing Choice Voucher (HCV)	The HCV program is a rental assistance program where very low-income individuals and families receive assistance to afford decent, safe and sanitary rental housing in the private market. The family pays up to 30% of their monthly adjusted income for rent and utilities, and THDA pays the remainder directly to the landlord. If a family qualifies for utility assistance, a utility assistance payment is paid to the family.	Department of Housing & Urban Development (HUD)	\$41,458,213
Family Self Sufficiency (FSS) Program	The FSS program facilitates access to the supportive services that participating HCV participants need to become free of public assistance in a five-year time period.	HUD	\$236,385
Tennessee Hardest Hit Fund: Downpayment Assistance Program	The HHF DPA program is a temporary stimulus program available to THDA Great Choice borrowers who purchase a home in a neighborhood that was hardest hit in the recent economic downturn and is recovering more slowly than other areas.	Department of Treasury	\$32,055,000* *Dollar amount represents the portion of a prior year temporary stimulus grant available during this fiscal year.
<i>Federally Funded Programs; Sub-recipient Administrator(s)</i>			
HOME Investment Partnership	The HOME Program provides funds to carry out multi-year housing strategies that expand the supply of decent, safe, sanitary and affordable housing for low and very low income households. Local governments, public agencies and non-profits are eligible applicants. THDA administers the HOME Program in those jurisdictions not designated by HUD as a local Participating Jurisdiction.	HUD	\$8,379,301* *Dollar amount represents the portion of a multi-year grant withdrawn during the fiscal year.
Emergency Solutions Grant (ESG)	ESG provides funding to local governments and non-profit service providers to assist individuals and families regain stability in permanent housing after experiencing a housing crisis or homelessness.	HUD	\$2,256,559* *Dollar amount represents the portion of a multi-year grant withdrawn during the fiscal year.

Program	Program Description	Source	Federal Funds
National Housing Trust Fund (NHTF)	The NHTF program increases and preserves the supply of decent, safe, and sanitary affordable housing for extremely low- and very low-income households, including homeless families.	HUD	\$3,160,279 *Dollar amount represents the 2017 total grant. No funds were requested by sub-recipients in FYE2018.
Low Income Home Energy Assistance Program (LIHEAP & LIHEAP Wx)	LIHEAP is a grant program that aims to assist low income households, primarily those who pay a high proportion of their income on home energy, with meeting their immediate energy needs. LIHEAP weatherization (Wx) program funds activities that increase the energy efficiency, health, and safety of eligible low-income individual's dwellings.	Department of Health & Human Services (HHS)	\$44,873,244
Weatherization Assistance Program (WAP)	The WAP Program assists low-income households to reduce their fuel costs while contributing to energy conservation through increased energy efficiency and consumer education. Households with young children, elderly or disabled members are prioritized.	Department of Energy (DOE)	\$3,109,224
Tennessee's Hardest Hit Fund: Blight Elimination Program (BEP); Keep My Tennessee Home (KMTH) Principal Reduction Recast Program with Lien Extinguishment (PRRPLE) & KMTH Reinstatement Only Program (ROP)	The HHF BEP helps fund approved non-profits and land banks to remove blighted properties in targeted areas. The KMTH PRPLE program lowers mortgage payments to affordable levels for homeowners with a financial hardship due to the death of a spouse, divorce, or underemployment. The KMTH ROP provides assistance to homeowners who have fallen behind on their mortgage loans and are in imminent danger of losing their home to foreclosure due to a qualified hardship that occurred after they acquired their home.	Treasury	\$416,501 *Dollar amount represents the portion of a prior year temporary stimulus grant available during this fiscal year.
National Foreclosure Mitigation Counseling Program	The NFMC program provides counseling to families and individuals facing the threat of foreclosure.	Treasury	\$11,648 *Dollar amount represents the portion of a prior year temporary stimulus grant available during this fiscal year.
Appalachian Renovation Loan Program (ARLP)	ARLP improves homeownership for the residents of the most distressed and at-risk counties of the Appalachian region through loans for repairs or improvements.	Appalachian Regional Commission (ARC)	\$227,179

<i>Federally Funded Programs; Contract Administrator</i>			
Section 8 Project Based Rental Assistance	THDA oversees the majority of the Project Based Section 8 Housing Assistance Payment Contracts through a Performance Based ACC Contract with HUD and is also a traditional contract administrator for a small portfolio of Section 8 properties for which THDA is the mortgage holder.	HUD	\$184,493,339
Total Federal Funds Available			\$320,676,872

The programs with Federal financial assistance for which dollar amounts may be projected for FYE2019 are presented in Table 3 below.

Table 3
Federal Financial Assistance Expected, FY 2018-19

Federal Program	FY 2018-19 Expected Resources
<i>Ongoing Federal Programs</i>	
HOME Investment Partnership	\$8,500,000
Emergency Solutions Grant	\$ 3,800,000
Low income Home Energy Assistance Program (LIHEAP)	\$55,650,000
Weatherization Assistance Program	\$ 9,921,955
National Housing Trust Fund	\$3,688,511
Section 8 Programs (Tenant and Project Based)	\$225,850,000
Appalachian Renovation Loan Program (ARLP)	\$270,000
Hardest Hit Fund (HHF)	\$11,394,400
Total of All Resources Available	\$319,074,866

As of 6/30/2018, two applications for new allocations of federal financial assistance were pending. THDA applied for the HUD Non-Elderly, Disabled Mainstream Voucher program funding in May 2018, and the HUD Homebuyer Education grant in August 2018. Several renewal applications were also pending including the FY2018-2019 Family Self Sufficiency (FSS) grant, which is part of the Section 8 Housing Choice Voucher Program, and the 2018 HOME, ESG, and National Housing Trust Fund funding agreements. All programs are funded by HUD.

Copies of any and all assurances for Federal financial assistance received as of the date of this report may be found in Appendix D of this document.

VIII. DATA COLLECTION & ANALYSIS

A. Description of Data Collection

THDA maintains databases of beneficiary information that are updated throughout the year at intervals determined by the program requirements or governing agency. Sub-recipients or grantees under contract with THDA to administer a housing program also maintain databases of beneficiary information and are required to report to THDA annually or periodically. Information from these databases is the primary source of information used in the reporting for Title VI and other purposes.

B. Minority Representation of Beneficiaries of THDA Programs

Table 4 shows the number of beneficiaries served by all of THDA's programs. For purposes of Title VI, THDA gathers, examines and reports on the race and ethnicity of all beneficiaries of THDA's programs, including those that are not funded through federal financial assistance.

During the fiscal year, THDA's federally funded programs assisted 135,366 households or individuals in the case of the Emergency Solutions Grant (ESG) program. The number of households (units) for the HOME program represents actual units completed during FY 2017-2018 with funds from prior grant years.

Each of the programs that THDA administers has eligibility requirements for participation. While specific eligibility requirements vary by program, the majority of beneficiaries must be low income, meaning that they earn 80 percent or less of HUD's area median income (AMI). THDA Homeownership programs, including the federally funded Hardest Hit Fund Programs, assist both low and moderate income borrowers. The income limits for these programs are set by the THDA Board based upon HUD's median family income (MFI).

Table 4 below uses extracts from the most recent HUD Comprehensive Housing Affordability Strategy (CHAS) data to show the number of Tennesseans who are at or below 100 percent of the AMI. CHAS data are custom tabulations based on the U.S. Census Bureau's 2011-2015 American Community Survey (ACS) and demonstrate housing problems and housing needs for low income households. Housing problems are defined as spending more than 30 percent of household income on housing, lacking complete kitchen/plumbing facilities, or overcrowding.

When comparing the data for income eligible Tennessee households by race and ethnicity to the data for race and ethnicity of THDA program beneficiaries, the analysis shows that THDA program funds overall are being used equitably to serve low income minority households in Tennessee. However, Hispanic low income households may be underserved in rental assistance, home energy assistance, weatherization and repair programs and homeownership activities funded through the HOME Investment partnership. White, low income households appear underserved in the rental and home energy assistance programs, most significantly in the

Section 8 Housing Choice Voucher program. The disclosure of race and ethnicity information for most programs administered by THDA is voluntary, and thus, underreporting may occur.

The beneficiaries for the HHF DPA program are from areas of the state that were hardest hit in the economic downturn and are recovering more slowly than other areas across the state. The demographic composition of these programs; therefore, will be impacted by the location of the borrower.

Table 4

Demographic Comparison of Potential Eligible Population & THDA Beneficiaries (FYE2018)

2011-2015 CHAS Data		Race			Ethnicity
		White, Non-Hispanic	Black, Non-Hispanic	Other Races, Non-Hispanic	Hispanic
<i>TN Households earning <30% AMI</i>		63.9%	28.2%	3.3%	4.6%
<i>TN Households earning 31% to 50% AMI</i>		70.8%	21.1%	2.8%	5.1%
<i>TN Households earning 51% to 80% AMI</i>		75.6%	17.8%	2.7%	3.9%
<i>TN Households earning 81% to 100% AMI</i>		79.3%	14.9%	2.4%	3.4%
THDA Federal Programs	Total Beneficiaries	White	Black/Af. American	Other/ Not Reported	Hispanic
HOME Investment Partnership	186	69.9%	28.5%	1.6%	<1 %
Emergency Solutions Grant*	6,600	65.7%	26.0%	8.2%	3.9%
Low Income Energy Assistance	90,488	54.5%	41.8%	3.7%	<1%
Weatherization Assistance	368	66.6%	30.4%	3.0%	1.9%
Section 8 Housing Choice Voucher	6,916	31.8%	67.7%	.5%	2.1%
Section 8 Project Based	28,610	56.5%	42.3%	1.2%	2.1%
Hardest Hit Fund (DPA program)	2,137	68.3%	29.5%	2.2%	5.9%
Hardest Hit Fund (KMTH-ROP, PRPLE)	31	64.5%	29%	6.5%	5.8%
National Housing Trust Fund**	0	0%	0%	0%	0%
Total Federal Programs***	135,336	54.6%	42.2%	3.2%	1.2%
Other THDA Programs	Total Beneficiaries	White	Black/Af. American	Other/ Not Reported	Hispanic
TN Housing Trust Fund	462	66.3%	30.7%	1.5%	<1 %
THDA Great Choice Homeownership	3,532	73.6%	24.3%	2.2%	5.9%
TN Foreclosure Prevention Program	548	35.9%	59.3%	4.7%	7.1%
LIHTC/MFB Programs	56,017	39.6%	49.4%	11.0%	<1%
Total Other Programs***	60,559	41.7%	47.9%	10.4%	1.2%

* ESG is an emergency shelter program, and thus, reports each sheltered individual separately, including children. The information is not currently compiled into "households" but rather is reported by occupied beds.

**The first National Housing Trust Fund grants were awarded in FYE2018; however, no projects were completed and no beneficiaries were assisted with the funds in FYE2018.

***The total beneficiaries is not an unduplicated total. A household may benefit from more than one of THDA's federal and/or other programs in a fiscal year. Thus, there may be duplicates in the total beneficiaries reported where one household or head of household is counted in more than one program, which may cause some inflation in the reporting.

C. Minority Representation of THDA Staff

At the time of this report, 244 individuals were employed by THDA. All staff are classified executive service. The breakdown of THDA staff by race, ethnicity and gender is provided in Table 5 below.

Table 5
Demographics of THDA Staff

Demographics	Number of Staff	Percent of Total Staff
Race		
White	157	64.3%
Black/African American	87	35.7%
Asian American/Pacific Is.	0	0%
Other	0	0%
Ethnicity		
Hispanic	9	3.8%
Gender		
Female	175	71.7%
Male	69	28.3%

*Note: The table above is based upon THDA's Affirmative Action Plan. The Plan includes only the racial reporting categories of White, Black/African American, Asian/Pacific Islander, and Other.

IX. Limited English Proficiency (LEP)

A. LEP Policy

THDA's current Limited English Proficiency (LEP) Policy is in Appendix E of this document. The policy requires all THDA employees to ensure reasonable steps are taken so that persons with LEP may have meaningful access and opportunity to participate in the services, activities and programs offered by THDA. The policy is accompanied by procedures for THDA employees when LEP encounters occur, which include identifying persons with LEP and their language, obtaining a qualified interpreter for oral interpretation and tracking LEP encounters. The policy also requires that written translations and notices should be provided to persons with LEP as needed. THDA contracts the University of Tennessee Language Center for written translation.

THDA began a Four Factor Analysis and a revision to the agency's LEP policy based upon the results of that analysis in spring of 2018. The revision was not complete as of the date of this report but should be completed by December 31, 2018.

B. Oral Interpretation

THDA offers language line assistance through Avaza Language Services. THDA conducts internal LEP procedural training on an as needed basis. Avaza provided THDA with "I Speak Cards," which are maintained at the entry location to each of THDA's offices. Avaza Language Services may be contacted at: Avaza Language Services, 5209 Linbar Drive, Suite 603, Nashville, TN 37211, (615) 534-3404.

C. Written Document Translation

For federal programs funded through HUD, THDA utilizes translated written resources and materials made available through HUD's website, which can be accessed at: https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep. The website provides a range of vital documents in a number of languages including: Brochures, booklets, fact sheets, forms, posters and public service announcements.

THDA contracts with the University of Tennessee Language Center for written translation of vital documents, not available through federal agencies or other legitimate sources, as needed in programs where THDA is the direct administrator (Housing Choice Voucher Program) and for public notices and summaries (for formula grant programs) to improve the effectiveness of citizen participation requests. THDA translates public notices and documents for public comment to Arabic, Spanish, Behdini (Kurdish), Sorani (Kurdish), Somali and Bosnian. Spanish is the most common language spoken, other than English, in THDA's service areas; thus, THDA publishes its Spanish translated public notices in three Spanish newspapers (one in each Grand Division of Tennessee) to promote public participation among Spanish speaking persons. Examples of one of our public notices in nine languages is found in Appendix F.

THDA publishes HCV waiting list openings on the website and on TNHousingSearch.org. THDA and TNHousingSearch.org website content is convertible to over 100 languages using Google Translator technology. TNHousingSearch.org is a free housing locator funded by THDA. It serves as the HCV landlord listing to assist voucher holders with finding an available unit. It is also available to the general public. Thus, anyone searching for a unit using TNHousingSearch.org, including THDA's HCV program participants, may search in the language of their choice.

The Hardest Hit Fund Down Payment Assistance (HHF-DPA) program is described and marketed on THDA's website, which is convertible to more than 100 languages.

D. Language Encounters

THDA employees follow the procedures outlined in the LEP Policy (Appendix E) when clients are in need of interpretation. All THDA employees are required to document an LEP encounter through an online fillable report that details telephone, on-site or written communications. The fillable report requests the date of the encounter, the type of communication, the language spoken, information regarding the referral (AVAZA, staff member, etc.) and any additional information or notes regarding the encounter. During FY 2017-18, Spanish was the predominant language group, other than English, encountered by the agency. THDA reported 80 LEP encounters throughout the year.

Table 6
Log of AVAZA LEP Encounters
FY 2017-18

Month	Spanish	Arabic	Total
July 2017	5		5
August 2017	4		4
September 2017	3		3
October 2017	4		4
November 2017	6		6
December 2017	7		7
January 2018	8	1	9
February 2018	9		9
March 2018	2		2
April 2018	13		13
May 2018	6	1	7
June 2018	8	3	11
Total	75	5	80

E. Efforts to Break Down Barriers with LEP Population

THDA continued to conduct outreach efforts to reach all citizens, including those in a protected class, for public comments on programs with federal financial assistance during appropriate time periods. Public notices are placed in major publications throughout the state and comments are accepted in person, through the mail or electronically. All grant and contract notices are also placed in major newspapers across the state and on THDA's website. Public notices and documents provided to the public for comment are provided in English and Spanish versions on THDA's website. Public notices informing the public of a public comment period or a public meeting are also published in English and Spanish and may be translated into Arabic, Bosnian, Somali, Behdini, and Sorani.

Public notices on the Action Plan and CAPER (as well as amendments), which primarily involve activities for our HUD formula grants programs (ESG, HOME, and the National Housing Trust Fund), were translated into Spanish, Arabic, Bosnian, Burmese, Behdini, Somali, and Sorani, and Vietnamese, as well as summaries into Spanish. THDA also translated the Executive Summary for the FY 2017-18 CAPER into Spanish. A copy of the translation may be found in Appendix G. THDA publishes its public notices in three Spanish newspapers to promote public participation among Spanish speaking persons, and emails a notice of availability to organizations that represent minority populations.

During FYE2018, THDA also advertised homeownership downpayment assistance programs at least once in every Spanish language and minority newspaper in Tennessee. Advertisements were also placed on every Spanish language radio station and on Spanish language TV where available.

THDA began a Four Factor Analysis and a revision to language access based upon the results of that analysis. Revisions to the LEP policy and a Language Access Plan (LAP) should be complete by December 31, 2018. The analysis will also help to inform the agency's Assessment of Fair Housing. Additionally, THDA focused Title VI training efforts on LEP during FYE2018. All employees completed a short training on the findings of the statistical analysis completed as part of the Four Factor Analysis, along with a refresher on federal guidance concerning LEP and THDA policy and procedures.

X. COMPLAINT PROCEDURES

A. Written Procedures

Tennessee Housing Development Agency (THDA) is committed to providing benefits to the public in a manner that ensures non-discrimination on the basis of race, color, national origin, sex/gender, disability, religion, creed, age (40 or over) or familial status* (presence of children or pregnancy, people in the process of adopting or gaining custody of a child under age 18) and any other class protected under state and federal law.

Any person alleging discrimination based on race, color, national origin, sex/gender, disability, religion, creed, or familial status has the right to file a complaint no later than 180 days after the alleged discrimination, unless the time for filing is extended by the responsible department official or his/her designee. At the complainant's discretion, the complaint can be filed with the federal department (typically, the Department of Housing and Urban Development), the Tennessee Human Rights Commission (THRC), the state recipient (THDA) or the agency providing the service (sub-recipients). Sub-recipients should maintain a complaint log and share it with THDA annually.

All complaints, written or verbal, will be accepted. It is not necessary to know the identity of the complainant, so long as the information is sufficient to determine the identity of the recipient and to indicate the possibility of a violation. THDA has developed a discrimination complaint form to be used by the complainant which can be found on THDA's website. Allegations submitted verbally without a written, signed complaint form will be investigated by the appropriate division at THDA and filed, but will not be accepted by the THRC for further investigation. THDA's investigation and actions may be limited when a complaint is submitted verbally only. In the event that the complaint is oral or in a format other than the discrimination complaint form, the complaint should contain the following information:

1. Name, address and telephone number of the complainant.
2. The location and name of the entity delivering the service.
3. The nature of the incident that led the complainant to feel discrimination was a factor.
4. The basis of the complaint, e.g., race, color or national origin.
5. Names, addresses and phone numbers of people who may have knowledge of the event.
6. The date or dates on which the alleged discriminatory event or events occurred. Forms may be developed to aid a complainant in filing the complaint, but the use of such forms is not required for acceptance of a complaint.

In handling discrimination complaints, THDA uses the following process:

1. Upon receipt of a complaint alleging discrimination under Title VI, Title VIII (Fair Housing) or Section 504 (verbal or written), the complaint must be forwarded to the

Civil Rights Compliance Advisor. If the complaint is verbal, the THDA staff member may forward the complaint information via email to the Civil Rights Compliance Advisor.

2. The Civil Rights Compliance Advisor will enter an entry into a Discrimination Complaint Log. A complaint log will be maintained for records and submission to the proper state and federal authorities. The Discrimination Complaint Log will be updated at various points noting the progress of the complaint through transfer or resolution.
3. The Civil Rights Compliance Advisor will send the complainant a written acknowledgement of receipt of the complaint within 10 business days. The acknowledgement may be sent via email or electronic communication when that is the original form of communication used by the complainant.
4. A preliminary review based on the information provided will be conducted by the Civil Rights Compliance Advisor within ten (10) business days to determine if the complaint involves alleged discrimination that would violate THDA's non-discrimination policy.
 - a. If it is determined that the complaint does not involve alleged activities that violate THDA's non-discrimination policy:
 - i. The Civil Rights Compliance Advisor will make a notation in the log that the complaint was reviewed and determined not to contain violations of THDA's non-discrimination policy.
 - ii. The complaint will be forwarded to the program division for response.
 - iii. The acknowledgement of receipt sent to the complainant will include an explanation that it has been determined that the activities reported do not violate THDA's non-discrimination policy, and the complaint has been forwarded to the program division for further investigation and response.
 - b. If it is determined that the complaint involves alleged activities that violate THDA's non-discrimination policy:
 - i. The acknowledgement of receipt sent to the complainant will include the time frame and basic process for investigation.
 - ii. The complaint will be forwarded to THRC or other appropriate agency (jurisdictional agency) for review.
 - iii. When THRC advises THDA to initiate an investigation, the complaint will be forwarded to THDA's Internal Audit (IA) division for investigation.
 - iv. IA will perform the investigation and issue a preliminary report of findings within 60 business days of the initial complaint. The preliminary report of findings will be given to THDA's Civil Rights Compliance Advisor.
 1. If the complaint of discrimination is found to be substantiated, THDA's Civil Rights Compliance Advisor will make recommendations on appropriate remedial actions based on the report of findings to THDA's Executive Director and THDA's Assistant General Counsel.
 - a. Once a decision is made on final actions, a letter will be issued to the complainant that documents the actions THDA has taken to remedy the alleged discrimination.

2. If the complaint of discrimination is found not to be substantiated, the Civil Rights Compliance Advisor will issue a letter to the complainant that summarizes the basis for the determination that no discriminatory action was found.
- v. The Civil Rights Compliance Advisor will complete an investigative summary and forward it, along with a copy of the response letter to THRC.
- vi. If the THRC notifies THDA that further action is warranted, the Civil Rights Compliance Advisor will coordinate the actions.
5. Complaint investigations and responses handled by THDA should be concluded within 120 days of their receipt.
6. Complainants may file an appeal with THDA's Executive Director or THRC directly. THDA's Executive Director will assign a review of the complaint, investigation, remedial actions and the appeal to THDA's Assistant General Counsel for consideration and consultation. THDA's Executive Director will make a determination within 30 days of the appeal and that decision will be final within THDA.

Note: THDA's Contract with HUD for Contract Administration of the Section 8 project based ("low rent") apartments does not include managing discrimination complaints. Written complaints received by THDA from residents of Section 8 project based apartments will be logged in THDA's discrimination complaint log, then forwarded to HUD FHEO for investigation and response. Complaints received in our call center will be given the appropriate information to file a complaint directly with HUD FHEO.

7. Sub-recipients of THDA Federal Funds

At the complainant's discretion, a discrimination complaint may be filed with the agency providing the service ("sub-recipient" of Federal funds), the recipient of Federal funds (Tennessee Housing Development Agency), the Federal department issuing the Federal funds (typically, the Department of Housing and Urban Development) or the state agency with jurisdictional authority, the Tennessee Human Rights Commission (THRC).

In handling discrimination complaints, sub-recipients of THDA federal funds are required to:

- a. Maintain written grievance procedures.
- b. Ensure their beneficiaries are notified of how to file a discrimination complaint with the sub-recipient, or alternately with THDA, THRC or the governing Federal agency (i.e. HUD, DOE).
- c. Investigate all complaints and respond to complainant within 90 days. Include information on how to file an appeal of the sub-recipient agency's decision to THDA or THRC.
- d. Submit copies of all discrimination complaints, investigative materials and communication with applicants or beneficiaries of programs funded with THDA

Federal funds to the THDA Civil Rights Compliance Advisor within 120 days of the date a complaint is filed with the sub-recipient agency.

B. Complaint Form

A copy of the THDA Discrimination Complaint form may be found in Appendix H.

C. Complaints & Lawsuits

During FY 2017-18, THDA received no Title VI complaints. THDA received one complaint alleging discrimination based upon race. The complaint was forwarded to the THRC on August 3, 2017, and it was determined that the complaint was housing related. THDA also received two complaints alleging a Fair Housing violation based upon disability. One was investigated internally through resolution. The other was investigated internally and referred to THRC and HUD due to another local agency's involvement.

THDA did not have any lawsuits alleging discrimination on the basis of race, color or national origin filed against the agency in FY 2017-2018.

XI. Title VI Training Plan

A. Staff Training

All THDA staff members receive annual training necessary to ensure effective identification of Title VI violations. In late FYE2017, a new non-discrimination training module (Title VI and Fair Housing) and quiz was launched with 226 (96 percent) THDA staff members completing it by early FYE2018. During FYE2018, new staff members were required to complete the online training and quiz within their probationary period, and 26 new employees had completed the training by the date of this report. A copy of the training materials and quiz are located in Appendix I.

For existing employees who have completed the full non-discrimination training module, shorter, topic specific training was provided. In June 2018, all employees completed a short training on LEP, including the findings of the statistical analysis completed as part of the Four Factor Analysis, and a refresher on federal guidance concerning LEP and THDA policy and procedures. A copy of the short training materials may also be found in Appendix I.

Additionally in 2018, in honor of the 50th anniversary of the Fair Housing Act, THDA's Civil Rights Compliance Advisor and Assistant Legal Counsel hosted a quarterly book club where books relevant to the issue of fair housing were voluntarily read and discussed by a sub-set of THDA employees. The book selections through the third quarter of 2018 were: *Evicted* (Matthew Desmond); *The Color of Law* (Richard Rothstein); *High Risers: Cabrini Green and the Fate of American Public Housing* (Ben Austen).

Many THDA staff members also attend fair housing or other forms of non-discrimination training presented by external partners or vendors throughout the year. Resources to attend this training come from THDA's training budget, which includes federal administrative funding. Nondiscrimination training is provided by a variety of organizations including: HUD, West Tennessee Legal Services, the Tennessee Fair Housing Council, Tennessee Human Rights Commission, Tennessee Association of Housing and Redevelopment Agencies (TAHRA), National Council on State Housing Agencies (NCSHA), Southeastern Affordable Housing Management Association (SAHMA), Tennessee Association of Affordable Housing Providers (TAAH). Examples of training and events attended by staff members of THDA during FY 2017-18 are described in Table 7.

Table 7
FY 2017- 18 Nondiscrimination Training

Event/Host, Location and Date	Number & % of THDA Participants	
Tennessee Association of Housing and Redevelopment Agencies Annual Conference, April 16-18, 2018, HUD Reasonable Accommodation, Preparing Fair Housing Assessment & VAWA training	5	2.0%
East Tennessee (ECHO) Fair Housing Conference, Knoxville, TN, April 6, 2018	8	3.3%
West TN Fair Housing Celebration, Memphis, TN, April 12, 2018	15	6.1%
Tennessee Fair Housing Matters Conference, Nashville, TN, April 17, 2018	42	17.2%
HBEI Counselors Conference, NeighborWorks Diversity Training, June 25, 2018	14	5.7%
THDA Online New Employee Non-Discrimination Training (within 60 days of employment)	26	81.2%*
THDA Annual Non-Discrimination Online Training & LEP Online Training	226	96%
THDA Fair Housing Act 50 th Anniversary Book Club, meetings held	35	14.3%

*26 of the 32 new employees hired as of the date of this report had completed the training. Some of the new employees who have not completed the training are still in their probationary period.

B. Agency Sponsorships of Non-Discrimination Training/Events

THDA also helps to sponsor Fair Housing events/training across the state, either sponsorships (cash donations) or through in kind donations of gifts and supplies, to ensure training is available to THDA staff and other housing professionals. THDA also sponsors the activities of organizations that affirmatively further fair housing. The sponsorships for organizations or events occurring in the fiscal year are summarized in Table 8 below.

Table 8
FY 2017-2018 Fair Housing/Non-Discrimination Events or Sponsorships

Organization Name or Event Name & Date	Cost of Sponsorship/ Training/Materials
East Tennessee (ECHO) Fair Housing Conference, Knoxville, TN, April 6, 2018	\$ 650
Tennessee Fair Housing Matters Conference, Nashville, TN , April 17, 2018	\$ 1,250
HBEI Counselors Conference, Neighborworks Diversity Training, June 25, 2018	\$14,400
THDA Fair Housing Act 50 th Anniversary Book Club, March, June, August 2018	\$ 1,038
Total	\$17,388

C. Partner & Sub-recipient Non-Discrimination Training

HUD Section 8 low rent apartment staff are typically members of SAHMA, as is THDA's project based compliance team. SAHMA provides Fair Housing training opportunities regularly through conferences that are attended by THDA compliance staff and by Section 8 low rent apartment staff. SAHMA also offers online Fair Housing training specific to Section 8 operations, which may be accessed by members.

THDA periodically includes Fair Housing information in developer workshops for LIHTC and MFB program developers and on-site managers. LIHTC on-site managers also often attend training and conferences provided by affordable housing organizations that incorporate Fair Housing information, such as SAHMA, the Tennessee Association of Affordable Housing Providers (TAAH) and the National Council of State Housing Agencies (NCSHA).

THDA also hosts an annual conference or "peer session" for education providers of THDA's Homebuyer Education Initiative (HBEI). This year, THDA hosted the Neighborworks organization to present their diversity course, Celebrating Difference in our Communities – Building Bridges Across Lines of Race, Age, Gender, and Ethnicity, to 100 HBEI providers and THDA HBEI staff.

HBEI agencies providing education to potential homebuyers (Great Choice and HHF DPA programs) use the *Realizing the American Dream* manual and deliver training on the Fair Housing Act through multiple curriculum components. Each potential homebuyer who completes homebuyer education receives a copy of the *Realizing the American Dream* manual. The manual covers the rights of potential borrowers or homeowners and helps them identify fair housing issues through examples. Information is provided regarding the Equal Credit Opportunity Act, Truth in Lending Act, Fair Credit Billing Act, Fair Credit Reporting and the Fair Debt Collection Practices Act. Homebuyer education is required for THDA loan programs that provide down payment assistance (Great Choice Plus & federally funded HHF DPA) and is voluntary for the Great Choice Program when downpayment assistance is not received. During FYE2018, 3,360 homebuyers received HBEI funded by THDA using the Realizing the American Dream curriculum.

Other sub-recipient training is covered below under Sub-Recipient Monitoring.

XII. Sub-recipient Monitoring

The following programs administered by THDA distribute Federal financial assistance to sub-recipients: HOME Investment Partnership, Emergency Solutions Grant (ESG), National Housing Trust Fund (NHTF), Weatherization Assistance Program (WAP), Low Income Home Energy Assistance Program (LIHEAP), HHF Blight Elimination Program, HHF Keep My Tennessee Home (ROP, PRPLE) and Appalachian Renovation Loan Program (ARLP). All are described under Table 2 above. The Title VI enforcement activities conducted for each program is based upon the federal guidance from the governing department (HUD, DOE, DHHS, Treasury, ARC).

With the exception of the LIHTC awarded through the American Reinvestment and Recovery Act (ARRA) of 2009, the LIHTC is not a direct grant to a sub-recipient or contract for funds, but rather is a dollar-for-dollar reduction in federal tax liability (e.g. the tax credit allocation) awarded to developers or investors in exchange for them providing financing to develop affordable rental housing. THDA monitors LIHTC properties for required activities under the Fair Housing Act, but does not monitor specifically for Title VI compliance.

THDA also has limited oversight of Project Based Section 8 properties through a performance based Annual Contributions Contract with HUD. THDA does not directly contract with these properties, rather the agency's role is to monitor the properties for compliance with the HUD requirements, including conducting Management Occupancy Reviews (MORs) that include certain HUD Fair Housing compliance measures (as directed by HUD). THDA may intake discrimination complaints from residents of the Section 8 properties, but these complaints are forwarded to HUD FHEO for investigation and response as per THDA's contract with HUD.

A. Pre-Award Procedures

THDA does not require pre-assessments, field or on-site compliance reviews of sub-recipients or contractors pre-award because federal requirements do not require pre-assessment reviews for any of THDA's federally funded programs. All funding applications from sub-recipients or grantees are reviewed by THDA prior to approval. The reviews ensure that applicants or recipients with outstanding findings of non-compliance with Title VI (or Fair Housing where applicable) are not funded or that appropriate conditions are included in the approval to ensure funds are not drawn down or paid until appropriate action is taken by the sub-recipient to ensure compliance.

1. Assurances

Each sub-recipient of federal funds from HUD, HHS and DOE is required to sign a federal "Assurance of Compliance under Title VI of the Civil Rights Act of 1964." Sub-recipients and/or contractors who have signed a "statement of assurance" may be found in Appendix J. Additionally, THDA policy requires that sub-recipients of formula grant funding make applications for assistance available in accessible locations.

The Department of Treasury does not require an assurance of compliance under Title VI for the Hardest Hit Fund program. Thus, no assurance is received for sub-recipients of this temporary stimulus funding.

2. Training

The type, timing (pre or post award) and frequency of training for sub-recipients is dependent on the program. In some programs, non-discrimination modules may be conducted during annual Grantee Workshops, which may occur during the pre-award stage. A new online non-discrimination training module will be available in FYE2019 (detailed below in “post-award training”) and may be completed at any time by a sub-recipient (pre- or post-award).

3. Review of Final Payment Prior to Allocation for Development Programs

Prior to the final allocation of funds for development grants, THDA has procedures detailing inspection, close-out and final payment associated with a completed project or grant. Before allocation award or final payment is made, work must be completed in accordance with the contract, which includes requirements established by Title VI (and contained in the "Assurance of Compliance under Title VI of the Civil Rights Act of 1964").

For example, prior to beginning a HOME project, grant recipients must adopt affirmative marketing procedures and requirements for all federally funded projects with five or more units. Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status or disability. These must be approved by THDA prior to any federal funds being committed to a project. Requirements and procedures must include:

- a. Methods for informing the public, owners and potential tenants about fair housing laws and the local program's policies;
- b. A description of what owners and/or the program administrator will do to affirmatively market housing assisted with HOME funds;
- c. A description of what owners and/or the program administrator will do to inform persons not likely to apply for housing without special outreach;
- d. Maintenance of records to document actions taken to affirmatively market HOME-assisted units and to assess marketing effectiveness; and
- e. Description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

B. Post-Award Procedures

1. Training

The type, timing (pre- or post-award) and frequency of training, including non-discrimination modules, for grant sub-recipients is dependent on the program. Table 9 lists all of the attendees of sub-recipient grantee workshops during FYE2018.

Table 9
Sub-Recipient Training

Division/Program	Training Description & Date	Attendees
Community Programs/ESG	ESG Grantee Workshop, 6/27/2018	51
Community Programs/HOME/CHDO	HOME/CHDO Grantee Workshops, 7/27/2017	30
Community Programs/LIHEAP	LIHEAP Grantee Workshop, 6/21/2018	46
Community Programs/NHTF	NHTF Application/Grantee Workshops, 4/25/2018	8
Community Programs/WAP	WAP Program Admin & Technical Training, 6/7-6/8, 2018	55
Total		190

2. Non-Discrimination Training

THDA currently includes non-discrimination components in grantee/sub-recipient workshops that cover multiple elements of program administration. For example, during the annual HOME Grantee Workshop, which is typically held annually at the end of January. Training for HOME grantees includes fair housing basics, fair housing law, how to identify fair housing issues and ways to make the public and clients aware of fair housing and ways to affirmatively further fair housing. The training is attended by HOME administrators located throughout the state.

THDA is launching a new online non-discrimination (Title VI, Fair Housing, Section 504) training module for sub-recipients in FYE2019, which may be accessed from the THDA website and completed at any time. Sub-recipient/grantees are encouraged to have all employees complete the training and are required to have the person assigned to Title VI/Fair Housing compliance complete either the THDA online non-discrimination training or other comprehensive non-discrimination training. Grantees are also encouraged to have volunteers view the THDA online non-discrimination training module.

The Department of Treasury does not require specific non-discrimination training of sub-recipients of Hardest Hit Funds. However, all sub-recipients will be encouraged to complete the new online non-discrimination training in FYE2019, including those who provide services supported by THDA's HHF funding.

3. Compliance Reviews

After the allocation of funds or post-award, THDA conducts compliance reviews with sub-recipients in the formula grants programs, LIHEAP and WAP programs and with on-site property managers in the Section 8 and LIHTC programs. The reviews vary based upon federal guidance for each program. THDA developed a sub-recipient self-survey form and process during FYE2018, which will be fully implemented in FYE2019, and used to inform THDA's Title VI and Fair Housing reporting efforts.

The frequency and number of compliance reviews is determined by the program director in accordance with federal regulations and program guidance. The total number of field (on-site) reviews for FY 2017-18 was 198. The number of field reviews and their corresponding programs include:

Table 10
Compliance Monitoring Reviews

Program	Reviews
HOME Investment Partnership	23
Low Income Home Energy Assistance Program (LIHEAP)	14
Weatherization Program	12
Section 8 Management Occupancy Reviews (MOR)	149
Total	198

A log is maintained by each program division of each review report by type of review. Included with the log are self-evaluation reports done by THDA. THDA does not maintain an annual compliance report, rather, program directors are responsible for program documents to include assurances of nondiscrimination per Title VI, where applicable. All records pertaining to Title VI Compliance are maintained by THDA. Annual reports are forwarded to appropriate state and federal agencies.

a. Formula Grant Programs Compliance Reviews

THDA encourages its grantees to identify those populations who are least likely to apply for assistance and to make outreach to those populations. To accomplish this, THDA recommends that the grantee advertise assistance availability at churches, convenience stores, libraries, senior centers, and local offices of the TN Department of Human Services. Additionally, THDA requires that each grantee have policies and procedures to assist non-English speaking applicants. Each grantee must also have a process that notifies LEP persons of language assistance available (i.e. notices, signs) and that is accessible to individuals seeking assistance. Grantee staff should be knowledgeable of all procedures and processes. THDA also requires all grantees to use the Fair Housing logo on all program materials.

THDA Community Programs staff complete a post-award compliance review for HOME and ESG awards. A routine compliance review is possible once the grant completion timeframe is over a year in duration.

Home & ESG compliance reviews cover at a minimum:

1. Files and records examination.
2. Grantee interviews with beneficiaries, potential beneficiaries and denied applicants.
3. Determine if public notification efforts are adequate in increasing program participation.
4. Determine if complaints are handled in a proper manner.
5. Determine the level of minority concentration and compare it to the number of potentially eligible participants by racial and ethnic category.
6. Determine if equal access of physical facilities is maintained.
7. Determine if location of service delivery point unnecessarily denies access to any person.
8. Determine if there are any lawsuits alleging discrimination on the basis of race, color or national origin filed against the recipient.
9. Determine if the recipient is receiving assistance from other federal agencies.
10. Determine whether any civil rights compliance reviews had been conducted in the last two years.

Grantees are required to maintain records of their actions for FHEO monitoring purposes, including advertisements for employment and documentation of subsequent applications and individuals hired. An extensive list of recordkeeping requirements are found in Chapter 6, Section 5 of the HOME Operations Manual. Grantees are monitored during the duration of a project and an Equal Opportunity/Fair Housing/Title VI checklist is used by program monitors to determine compliance with requirements, responsibilities, activities and recordkeeping. This checklist also contains questions regarding complaints filed and any indications of Equal Opportunity and Fair Housing policy violations.

In addition to meeting all requirements of the HOME Program Description and HOME Operations Manual, grantees have certain responsibilities to ensure protected persons or groups are not denied benefits. Responsibilities of grantees, which are undertaken throughout the progress of the projects, are outlined in Chapter 6, Section 3 of the HOME Operations Manual. In addition, the HOME Operations Manual requires certain activities of grantees and includes: a minimum of one fair housing activity, which includes distribution of the *Fair Housing Equal Opportunity for All* pamphlet to each program applicant, Section 3 activities and documentation, creation and distribution of a policy of nondiscrimination, Equal Opportunity requirements in construction-generated employment, minority and female solicitation, Section 504 requirements, site and neighborhood standards and consideration of fair housing and local zoning ordinances. As part of sub-recipient reviews in the HOME program, THDA monitors to ensure that grantee has written policies of non-discrimination; provides Title VI training for employees and otherwise complies with Title VI provisions. A copy of the monitoring form for this program, along with other required forms may be found here: <https://thda.org/business-partners/home-program-forms>.

ESG recipients must perform and document action in the area of enforcement and promotion to affirmatively further fair housing. During the grant year, recipients must carry

out a minimum of one activity to promote fair housing. Nondiscrimination and equal opportunity laws are also applicable to ESG programs and recipients. The ESG Program Manual requires all grantees to make facilities and services available to all persons and families on a nondiscriminatory basis. Publicity surrounding the availability of shelter facilities should reach all persons regardless of handicap, race, color, religion, sex, age, familial status or national origin. Grantees must also establish additional procedures to disseminate information to those interested in handicap accessible services and facilities. Information regarding fair housing requirements and activities can be found in the ESG Program Guidelines and the ESG Program manual, which is available to the public on THDA's website.

b. LIHEAP and Weatherization Program Compliance Reviews

THDA Community Programs staff complete a post-award compliance review for LIHEAP funding. The LIHEAP monitoring tool includes a section on Title VI and Civil Rights compliance. During compliance monitoring, LIHEAP agencies are asked about their nondiscrimination policies in place in relation to both employment practices and beneficiaries, along with their LEP practices. A copy of the LIHEP monitoring form is located in Appendix K.

c. Section 8 Project Based Contract Compliance Reviews

THDA's contract with HUD governs the content of the Section 8 Management Occupancy Review (MOR). The current contract with HUD does not include Civil Rights Front End Limited Monitoring or other non-discrimination review. As part of the MOR process, the THDA Program Compliance division monitors Affirmative Fair Housing Marketing Plans, Tenant Selection Plans, recent advertising, and the posting of the Fair Housing Logo and Fair Housing Poster. The THDA MOR review covers at a minimum:

1. Files and records examination.
2. Grantee interviews with beneficiaries, potential beneficiaries and denied applicants.
3. Determine if public notification efforts are adequate in increasing program participation.
4. Determine if complaints are handled in a proper manner.
5. Determine if equal access of physical facilities is maintained.
6. Determine if service delivery point unnecessarily denies access to any person.
7. Determine if the recipient is receiving assistance from other federal agencies.

d. Hardest Hit Fund KMTB and BEP Sub-recipients

The Department of Treasury does not require Civil Rights compliance monitoring or a non-discrimination review of sub-recipients for the temporary programs related to the foreclosure crisis and specifically the Hardest Hit Fund. However, Treasury has required extensive quarterly reporting that includes beneficiary demographics. These reports may be found online at: <http://www.treasury.gov/initiatives/financial-stability/TARP->

[Programs/housing/Pages/Program-Documents.aspx#TN](#). THDA reviews beneficiary reports regularly to ensure programs are serving all intended beneficiaries without gaps in service and where gaps are found plans outreach efforts based on the reporting. THDA is in the process of establishing limited review processes for HHF KMTH and BEP sub-recipients.

C. Procedures for Non-Compliance

If THDA determines there may be a Title VI violation, a full complaint investigation will be initiated. A letter will be sent to the complainant explaining that an investigation will be started and their cooperation will be needed in the future. A complaint log is kept for records and submission and all violations are reported to the appropriate state or federal Agency. It should be noted that THDA does not have enforcement authority. Once the possible violation has been reported, any enforcement and/or punitive decisions are made by the appropriate agency. For more information regarding THDA's procedures for handling Title VI compliance, please refer to "Section VIII Complaint Procedures."

During this past fiscal year, no sub-recipients, vendors or contractors were found to be noncompliant with Title VI.

D. Sub-recipients & Vendors

1. Sub-recipients

THDA distributes federal funds to sub-recipients in the HOME, ESG, WAP, LIHEAP, National Housing Trust Fund, NFMHC, HHF BEP and KMTH. All programs are described above under Table 2. All of THDA's sub-recipients (and vendors) during FYE2018, along with the begin/end date of the contract, dollar amount of the contract/funding award, location, type of funding, M/WBE designation (where known), descriptions of services and whether the contract was competitive are contained in Appendix L.

Sub-recipients of THDA's grant programs typically are non-profit, city, county or regional governmental organizations or entities. HOME funds are awarded annually through a competitive application process to cities, counties and nonprofit organizations outside a local participating jurisdiction. ESG funds are awarded to Continuum of Care (COC) agencies which are regional or local planning bodies that coordinate housing and services funding for homeless families and individuals. NHTF grants are awarded through a competitive application process to local Public Housing Authorities, non-profit and for-profit entities. LIHEAP and WAP funds are sub-contracted to a network of local community agencies, such as Human Resource Agencies. The network may be found here:

<https://thda.maps.arcgis.com/apps/MapSeries/index.html?appid=d8eaf5603bc14aafa699d08c4d317e8d>

The Hardest Hit Fund DPA and KMTH programs are administered with cooperation from THDA's Great Choice lending network and through sub-recipient loan servicers. For HHF BEP, THDA works in partnership with approved non-profit agencies and land banks in targeted areas.

Only a few sub-recipients of THDA federal funds enter into sub-contracts for THDA-funded activities, primarily those programs that involve construction: HOME, NHTF, WAP, LIHEAP Wx & HHF BEP. As a requirement of receiving HUD grant funds (HOME and ESG), entitlement jurisdictions must submit a certification of affirmatively furthering fair housing (AFFH) to HUD's Office of Community Planning and Development (CPD). As per HUD requirements, HOME grantees receive information regarding the affirmative steps that must be taken to ensure that women and minority businesses are afforded opportunities to bid on service, material, and construction contracts. HOME grantees entered into four (4) contracts/sub-contracts for grant funded activities during the reporting period, and two (2) were awarded to minority businesses and two (2) to women owned businesses.

While WAP, LIHEAP Wx and HHF BEP sub-recipients may enter into sub-contracts for THDA federal funds, none of the federal governing agencies (DOE, DHHS, Treasury) require THDA to track or report sub-recipient contracts or sub-contracts for minority, women's business enterprise participation. However, all THDA sub-recipients are encouraged to include women and minority owned businesses in their bid process, and are given instructions on how to access the statewide Diversity Business Enterprise Directory to help connect sub-recipients to women and minority owned business options in the state. The link is also posted on THDA's website on the program information page.

2. Vendors

THDA also enters into contracts with vendors to support program activities. Minority/Women's Business Enterprise (M/WBE) vendor statistics are shown in Table 11. All vendors with a contract (along with sub-recipients) are included in Appendix L.

Table 11
Minority/Women's Business Enterprise (M/WBE) Vendor Statistics
FY 2018-19

Total Number of Vendors	60
Number of M/WBE Vendors	8
Percentage M/WBE Vendors	13.3%
Total Dollar Amount Awarded to Minority Vendors	\$2,190,500
Percentage of Dollar Amount Awarded to Minority Vendors	12.5%

Note: The total number of contracts with minority and women owned businesses may be underreported. Vendors secured through the Request for Proposal process are asked to voluntarily self-identify as M/WBE if applicable. Vendors secured through non-RFP methods for contracts less than \$50,000 or that are sole-source are also asked to voluntarily self-identify as M/WBE if applicable.

XIII. Public Notice and Outreach

A. Information Dissemination

1. Non-discrimination Policy Dissemination

THDA's non-discrimination policy and complaint form is located on the THDA website at:
<https://thda.org/about-thda/title-vi-compliance>

2. Program Information Dissemination

THDA currently informs the public about its programs and services through the following means:

- THDA website & newsletters
- Advertisements- online and print
- News releases
- Industry meetings
- Public meetings
- Workshops- application & grantee; housing industry and special interest groups
- Direct mail
- Email blast list
- Public notification through newspapers
- Social media
- Special needs directories
- Radio and television interviews about THDA programs
- Workshops for consumers about Title VI and Fair Housing
- Public service announcements
- Public speaking engagements

THDA presents civil rights, nondiscrimination and fair housing information through the following means:

- Workshops and training for staff, grantees and program participants
- THDA's Title VI and Fair Housing webpages of the THDA website (<https://thda.org/about-thda/fair-housing-title-vi-compliance>)
- Display of nondiscrimination posters in THDA offices (English and Spanish)
- HUD Title VI, Fair Housing and LEP resources and materials
- Fair Housing Booklet from HUD, *Fair Housing & Equal Opportunity for All*, is distributed to all Section 8 beneficiaries (English & Spanish versions).

- The “Renters” section of the THDA website includes a section on Fair Housing with links to important guidance and information (<http://thda.org/renters/renters>).
- HOME, ESG & NHTF grant policies regarding nondiscrimination and Title VI
- Contract Language

THDA’s website contains information on Fair Housing and Title VI. The webpages include information on the Fair Housing Act and Title VI, other nondiscrimination laws and regulations, examples of discrimination, nondiscrimination resources and the methods for filing either a fair housing or Title VI complaint. In addition, a copy of the Title VI Implementation Plan is posted on the website and is accessible to the public. Hard copies of this Title VI Implementation Plan are also available to the public upon request. The fair housing and Title VI webpages may be accessed at: <http://thda.org/about-thda/fair-housing-title-vi-compliance>

3. Sub-recipient Information Dissemination

THDA encourages all of its grantees/sub-recipients to identify those populations who are least likely to apply for assistance and to make outreach to those populations. To accomplish, THDA recommends that the Grantee advertise assistance availability in churches, convenience stores, libraries, senior centers, and local offices of the TN Department of Human Services.

HOME sub-recipients are required to disseminate to all applicants the brochure found at the following link: http://portal.hud.gov/hudportal/documents/huddoc?id=FHEO_Booklet_Eng.pdf. We recommend our ESG grantees provide the Fair Housing – It’s Your Right! Pamphlet to all beneficiaries: <https://www.amazon.com/Fair-housing-Your-Right-HUD-1686-FHEO/dp/B000114W1Q>

Additionally, THDA requires that each grantee have policies and procedures to assist non-English speaking applicants. Each Grantee must also have a process that notifies LEP persons of language assistance available (i.e. notices, signs) and that is accessible to individuals seeking assistance. Grantee staff should be knowledgeable of all procedures and processes. THDA also requires all grantees to use the Fair Housing logo on program materials.

4. Complaint Procedures Dissemination

THDA’s Complaint Procedures are available on the website at: <https://thda.org/about-thda/title-vi-compliance>.

5. Minority Participation – Planning/Advisory Boards

Information regarding advisory board members and a link to the published list of members are provided in Table 12.

Table 12
THDA Advisory Boards

Advisory Board	Published List of Members (Yes/No)	Link to Published List of Board Members	# Minority	% Minority Members	% Female Members	Total Members
Energy Efficiency & Weatherization Advisory Board	Yes	http://thda.org/about-thda/energy-efficiency-and-weatherization	1-Af. Am	7%	29%	14
Housing Education Advisory Board	Yes	http://thda.org/about-thda/housing-education	5-Af. Am	50%	60%	10
Housing Industry Advisory Board	Yes	http://thda.org/about-thda/housing-industry	2-Af. Am 1-Hispanic	18%	35%	17

B. Boards & Advisory Bodies

THDA is governed by a 15-member board of directors who are appointed by the Governor. The board is composed of 43 percent female and 29 percent minority members. Detailed information on the members of THDA's Board of Directors, their representation, their committee assignments and their race and gender are reported in the Overview of this Plan and in Appendix A.

THDA currently has three advisory boards (see Table 12 above). Advisory Board members are invited to serve by THDA staff leading the programs relevant to a particular industry/board. Staff seek to invite persons to the board that represent a range of specialties, geographies (across the state and well as urban/rural), demographics and that work with THDA's programs. While the Board discussions do not directly impact agency policy, advisory boards strengthen THDA's partnerships and assist with the utilization and effectiveness of current programs, as well as make suggestions for the creation and implementation of new initiatives. The Energy Efficiency and Weatherization Advisory Board consists of 14 members who provide a broad representation of organizations and agencies with expertise to advise THDA on improving policies, procedures, public awareness, and financial assistance allocations to enhance the quality of life to all Tennesseans, with a focus on low to moderate income persons.

The Housing Industry Advisory Board has 19 members. Members are selected based on their experience and history in the lending industry. All members are employed by THDA approved lenders or banks and have held or currently hold upper management positions within their organizations or are realtors selected from each of Tennessee's three Grand Divisions. Member selection is based on the realtors' level of involvement in their respective Realtor Associations and/or National Association of Realtors, activity in community projects, leadership in other realtor-related organizations and their advocacy for affordable housing for first-time homebuyers and underserved populations in their respective geographical areas.

The Housing Education Advisory Board consists of a total of 11 members who are housing and financial educators that serve to advise THDA in promoting sustainable housing choices and building strong communities.

C. Minority Input

1. Minority Input Opportunities

THDA allows opportunities for public comment throughout the year on various programs and reporting requirements. THDA conducts outreach efforts to reach all citizens, including those in a protected class, for public comments on programs with federal financial assistance during appropriate time periods. Public notices are placed in major publications throughout the state and in targeted minority newspapers when available, as well as on THDA's website. Public notices and documents provided to the public for comment are provided in English and Spanish versions on THDA's website. Public notices informing the public of a public comment period or a public meeting are also published in English and Spanish and may be translated into Arabic, Bosnian, Somali, Behdini, and Sorani.

THDA has an email blast list process for public notice/comments that sends emails when public review/comment is required for program changes. The list was created to ensure organizations that serve a protected class are specifically notified on public comment periods.

The Citizen Participation Plan is the strategy for public participation that incorporates citizen input into the planning, implementation, coordination, and assessment of Tennessee's projects and activities. A copy of the Plan may be found here:

https://s3.amazonaws.com/thda.org/Documents/Research-Planning/Updated-Citizen-Participation-Plan-per-09_2014-Sub-Amendment.pdf As part of the Tennessee 2015-2019 Consolidated Plan, a web-based Housing and Community Needs Survey was conducted from February 4th to March 2nd of 2015. The survey was completed by 671 respondents, representing every county in Tennessee. Individuals solicited for participation included elected officials, state and local governing bodies, representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, and other groups involved in the housing and development fields.

THDA's Industry and Government Affairs (IGA) team continued outreach efforts across the state in FY2017-18 with one liaison for each grand division. Each liaison is charged with sharing information with local stakeholders and officials about THDA programs, grants and services that are coming to their community or for which their community could apply. IGA Outreach staff are members of the National Association of Real Estate Brokers (Realtists), an organization with the goal of bringing together the nation's minority professionals in the real estate industry to promote the meaningful exchange of ideas, and regularly attend functions and activities of the association to communicate information on THDA's programs.

The THDA IGA Outreach team also have relationships or hold memberships in women and minority centered organizations including, Pathway Women's Business Center, which concentrates on the growth of women entrepreneurs across Tennessee and the Nashville Black Chamber. The Nashville Black Chamber periodically holds joint meetings with the Hispanic and Latino Chambers when discussing common community issues, such as housing or voting rights. THDA IGA staff also hold membership in the Interdenominational Ministerial Fellowship to stay apprised of faith based issues in the community.

THDA's Real Estate Liaison is also a member of and involved with the National Association of Hispanic Real Estate Professionals (NAHREP) and the NAREB, Nashville and Memphis Chapters. THDA's Real Estate Liaison is in the planning stages with NAHREP to provide their members, in conjunction with Great Nashville REALTORS®, a Continuing Education class on THDA Great Choice mortgage products, processes, and guidelines. THDA also has an individual membership in Jackson Madison County African American Chamber of Commerce.

THDA also maintains a free housing search engine, TNHousingSearch.org, and encourages all of our multifamily rental grantees, contractees and LIHTC owners to post their available units/properties on the site. The site is ADA, Title II 508 compliant and works with assistive technology. The website is supported by a call center, which offers bi-lingual staff (English/Spanish).

2. Grants and Bids Process

THDA Invitation to Bid include this standard language:

No person on the grounds of handicap or disability, age, race, color, religion, sex, national origin, or any other classification protected by Federal and/or Tennessee State constitutional and/or statutory law shall be excluded from participation in, or denied benefits of, or be otherwise subjected to discrimination in the performance of the Contract or in the employment practices of the Contractor. The Contractor shall, upon request, show proof of such non-discrimination, and shall post in conspicuous places, available to employees and applicants, notices of non-discrimination.

THDA Request for Proposals include this standard language (response required):

THDA encourages the participation of women, persons of color, persons with disabilities, ethnic minorities and members of other federally and State-protected classes. Describe your firm's affirmative action program and activities. Include the number and percentage of members of federally and State-protected classes who are either partners or associates in your firm, the number and percentage of members of federally and State-protected classes in your firm who will work on matters referenced in this RFP.

The THDA Operations Division oversees agency contracts with vendors and utilizes the State's list of approved vendors located at:

<https://tn.diversitysoftware.com/FrontEnd/VendorSearchPublic.asp?XID=5137&TN=tn> to assist

in the search for qualified minority vendors. The appropriate methodologies for ensuring that women and minority vendors have an adequate opportunity to participate in the solicitation is an important part of THDA's procurement strategy.

THDA contracts (non-Federal funds) include the following standard contract language:

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 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.

THDA Contracts with Federal funds include the following standard contract language:
Equal Opportunity. *During the performance of this Contract, the Contractor agrees as follows:*

- a. *The Contractor will not discriminate against any employee or applicant for employment because of race, color, religion, sex, sexual orientation, gender identity, or national origin. The Contractor will take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, sex, sexual orientation, gender identity, or national origin. Such action shall include, but not be limited to the following:*
 - (1) *Employment, upgrading, demotion, or transfer, recruitment or recruitment advertising;*
 - (2) *Layoff or termination;*
 - (3) *Rates of pay or other forms of compensation; and*
 - (4) *Selection for training, including apprenticeship.**The Contractor agrees to post in conspicuous places, available to employees and applicants for employment, notices to be provided by the contracting officer setting forth the provisions of this nondiscrimination clause.*
- b. *The Contractor will, in all solicitations or advertisements for employees placed by or on behalf of the Contractor, state that all qualified applicants will receive considerations for employment without regard to race, color, religion, sex, sexual orientation, gender identity, or national origin.*
- c. *If the State approves any subcontract, the subcontract shall include paragraphs (a) and (b) above.*

Various THDA programs have different **contractual provisions for sub-recipients** to meet federal requirements. Examples of contractual provisions prohibiting discrimination and that are agreed to by sub-recipients of THDA programs include the following:

- *“The (Name of Organization) does not discriminate on the basis of race, color, religion, national origin, sex, age, or handicapped status in the admission or access to, or treatment or employment in, its federally assisted programs or activities.”*
- *“Under Title VI of the Civil Rights Act of 1964, no person 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.”*
- *“The Grantee 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 Grant Contract or in the employment practices of the Grantee on the grounds of disability, age, race, color, religion, sex, national origin, or any other classification protected by Federal, Tennessee State constitutional, or statutory law. The Grantee shall, upon request, show proof of such nondiscrimination and shall post in conspicuous places, available to all employees and applicants, notices of nondiscrimination.”*
- *“NeighborWorks will not permit discrimination by Grantees against clients on the basis of their gender, race, color, religion, national origin, ancestry, creed, pregnancy, marital or parental status, familial status, sexual orientation, or physical, mental, emotional or learning disability. “*
- *“Provider hereby agrees that counseling offices and services will be accessible to persons with disabilities, as well as to homeowners needing translation services. Provider will not discriminate against clients on the basis of their gender, race, color, religion, national origin, ancestry, creed, pregnancy, marital or parental status, familial status, sexual orientation, or physical, mental, emotional or learning disability.”*

Only a few sub-recipients of THDA federal funds enter into sub-contracts for THDA-funded activities, primarily those programs that involve construction: HOME, WAP, LIHEAP Wx & HHF BEP. While WAP, LIHEAP Wx and HHF BEP sub-recipients may enter into sub-contracts for THDA federal funds, none of the federal governing agencies (DOE, DHHS, Treasury) require THDA to track or report sub-recipient contracts or sub-contracts for minority, women’s business enterprise participation. However, all THDA sub-recipients are encouraged to include women and minority owned businesses in their bid process, and are given instructions on how to access the statewide Diversity Business Enterprise Directory to help connect sub-recipients to women and minority owned business options in the state. The link is also posted on THDA’s website.

Additionally, as per HUD requirements, HOME grantees receive information regarding the affirmative steps that must be taken to ensure that women and minority businesses are afforded opportunities to bid on service, material, and construction contracts. HOME grantees entered into 4 contracts/sub-contracts for grant funded activities during the reporting period, and 2 were awarded to minority businesses and 2 to women owned businesses.

XIV. COMPLIANCE REPORTING

With the exception of the Tennessee Human Rights Commission, THDA does not submit Title VI reports to any federal or state agency.

HUD has oversight for the following programs: HOME Investment Partnership, Emergency Solutions Grant, Section 8 Housing Choice Voucher Program and Section 8 Project Based Rental Assistance under the following governing legislation for each program:

- HOME: 24 CFR 92
- ESG: 24 CFR 576
- NHTF: 24 CFR Parts 91 and 93, Interim Rule
- Section 8 Rental Assistance: 24 CFR 982
- Section 8 Contract Administration: 24 CFR 983

DHHS has oversight for the Low Income Housing Energy Assistance Program (LIHEAP) under Title 45 (Public Welfare) of the Code of Federal Regulations, Part 96 (Block Grants), Subpart H (LIHEAP), cited as 45 C.F.R. 96.

DOE has oversight for the Weatherization Assistance Program under 10 CFR Part 440.

The Department of Treasury, Internal Revenue Service (IRS) has oversight for: the Hardest Hit Fund, the Low-Income Housing Tax Credit Program and the Homeownership Programs under the following governing legislation for each program:

- HHF: Section 109 of the Emergency Economic Stabilization Act (ESSA), Division A of Pub. L. 110-343, 112 Stat. 3774 (2008)
- LIHTC: Section 42 of the Internal Revenue Code of 1986, as amended and related Treasury Regulations, found primarily at 26 C.F.R. Section 1.42 et seq.
- Homeownership Programs: Section 143 of the Code pursuant to which tax exempt bond issues are made for the mortgage program, and volume cap under Section 146 of the Code allocated to THDA and made available to local issuers to permit issuance of tax-exempt bonds for multifamily housing.

THDA did not have any Title VI or related discrimination audits for FY 2017-2018.

XV. EVALUATION PROCEDURES

It is through compliance monitoring described in other sections of this Plan that THDA makes a comparison of the quality of services for programs where this monitoring is required. In some programs, additional activities are completed for the purposes of evaluation to determine quality and outcome of services. The primary evaluation activities for fiscal year 2017-18 are described in the sections below.

A. Compliance Monitoring

THDA ensures compliance with Title VI through its contracts with sub-recipients and contractors, sub-recipient training, pre- and post-award procedures and through monitoring of THDA programs. More information on the monitoring of sub-recipients may be found in Section IX “Compliance Reviews” and Section X “Compliance/Noncompliance Reporting”. THDA evaluates the performance of sub-recipients through the compliance monitoring process annually. THDA did not report any Title VI or Fair Housing deficiencies during the compliance monitoring process.

For the temporary programs related to the foreclosure crisis and specifically the Hardest Hit Fund, The U.S. Treasury has required extensive quarterly reporting that includes beneficiary demographics. These reports may be found online at:

<http://www.treasury.gov/initiatives/financial-stability/TARP-Programs/housing/Pages/Program-Documents.aspx#TN>.

B. Consolidated Plan, Analysis of Impediments & Fair Housing Plan

The Consolidated Plan combines the planning, application, and reporting processes for five U.S. Department of Housing and Urban Development (HUD) formula grant programs (CDBG, HOME, ESG, NHTF and the Housing Opportunities for Persons with Aids (HOPWA)) that support a variety of housing and community development activities throughout Tennessee, primarily for the benefit of low- and moderate-income households. As a recipient of these Federal funds, the State is required to prepare and submit a Consolidated Plan to HUD every five years. THDA is lead agency responsible for preparing the Consolidated Plan, and coordinates with the Department of Economic and Community Development (ECD), who oversees the CDBG program in entitlement jurisdictions, along with the Department of Health, who oversees the HOPWA program (the “Consolidated Partners”).

The Consolidated Plan examines the current housing situation, explores the housing and community development needs of the State, and sets priorities for spending HUD grant monies. This document serves as a guide in helping the State of Tennessee meet affordable housing, community development, economic development, public service, and fair housing needs over the next five years. The Consolidated Plan also addresses the changing external factors influencing existing programs and the need to be accountable for the resources Tennessee has

been granted or will coordinate. The latest Consolidated Plan covers 2015-2019, and may be found here: <https://s3.amazonaws.com/thda.org/Documents/Research-Planning/Full-2015-2019-Consolidated-Plan.pdf>.

The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. The most recent Annual Action Plan is on the THDA website: https://s3.amazonaws.com/thda.org/Documents/Research-Planning/Consolidated-Planning/AAP-1718-wESG_Website.pdf

The State of Tennessee reports on accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER). The most recent CAPER report is published on THDA's website: https://s3.amazonaws.com/thda.org/Documents/Research-Planning/Consolidated-Planning/CAPER/1617CAPERforwebsite_Nov2017.pdf

The Analysis of Impediments (AI) is a review of impediments or barriers that affect the rights of fair housing choice. It covers public and private policies, practices, and procedures affecting housing choice. Impediments to fair housing choice are defined as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, national origin, or creed. The Consolidated Partners use the AI for five years to serve as a priority list for addressing impediments to Fair Housing. The most recent AI is found here on the THDA website: https://s3.amazonaws.com/thda.org/Documents/Research-Planning/Consolidated-Planning/2013-Tennessee-Analysis-of-Impediments/TN-2013-AI-FNL_201309100836188733.pdf

The State has developed activities to address the findings contained in the AI and has developed a comprehensive plan to overcome the impediments. The AI categorizes the impediments as either private sector or public sector impediments and the Fair Housing Plan organizes them in a similar manner. The State intends to take a comprehensive approach in addressing both private and public sector impediments by conducting, encouraging and/or facilitating the actions identified in the AI.

In August 2018, HUD published a proposed notice for streamlining the regulations relating to AFFH, which may impact the way the State approaches the AI and Fair Housing planning and reporting. THDA is responding to the request for public comment on the new proposed requirements in October 2018.

C. Beneficiary Reports

THDA completes an annual report on HOME allocations received by the State of Tennessee, the households served by the HOME Program, and the activities completed during the most recent fiscal year. The most recent report for fiscal year 2015-2016 may be found on the THDA website at: https://s3.amazonaws.com/thda.org/Documents/Research-Planning/Consolidated-Planning/HOME-Beneficiary-Report/2016-HOME-Beneficiary-Report_Final.pdf. The report serves as one evaluation tool for the grant program. The report shows that the allocation of HOME funds are fairly proportional, based on race, to the low-income households with housing problems in Tennessee, although Hispanic and Asian households are slightly underserved compared to CHAS data.

D. Housing Choice Voucher Program Annual & Five Year Plans

In accordance with HUD regulations, THDA submits an annual PHA Plan and a 5-Year Plan once every fifth fiscal year. The Plans are a comprehensive guide to program policies, operations, and strategies for meeting local housing needs and goals, including the assurance that civil rights objectives are met and protected classes equitably served. As part of the annual planning and Section 8 assessment program, THDA creates maps showing the areas of high poverty and minority concentration where Section 8 voucher holders reside. THDA's plans may be found on the THDA website at: <https://s3.amazonaws.com/thda.org/Documents/Renters/TN903PHAPlanFY2017.pdf>

E. Additional Activities/Deficiencies

THDA has no additional activities or deficiencies to report for FY2017-2018.

XVI. Responsible Officials



Ralph M. Perrey
Executive Director
Tennessee Housing Development Agency
502 Deaderick St., Andrew Jackson Bldg.
Nashville, TN 37243



Laura Swanson
Civil Rights Compliance/Title VI Coordinator
Tennessee Housing Development Agency
502 Deaderick St., Andrew Jackson Bldg.
Nashville, TN 37243

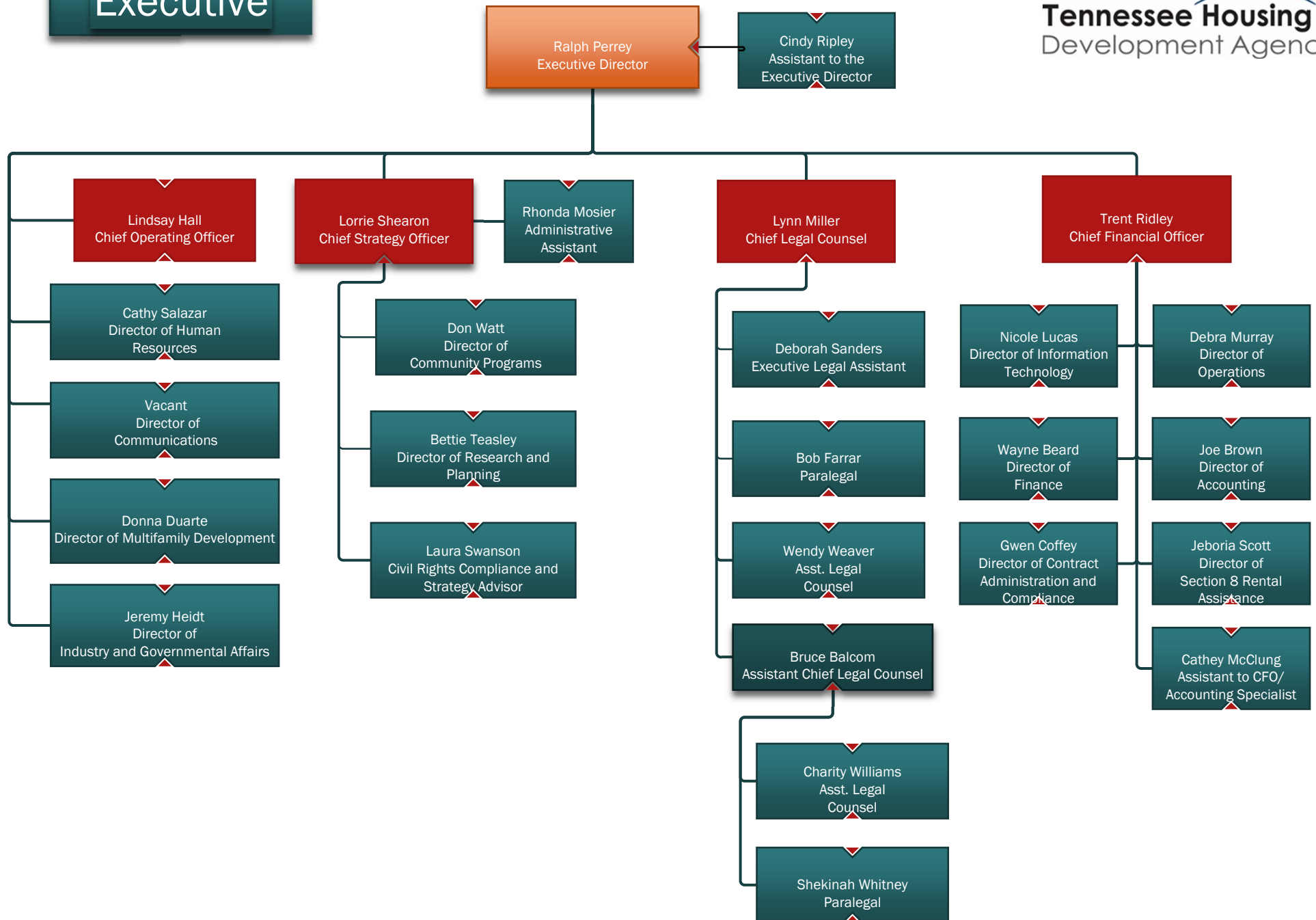
Appendix A: THDA Board of Directors

Board Member	Term	Representation/ Appointed By/ Committees Served	County of Residence Race / Ethnicity / Gender
THDA CHAIR Kim Grant Brown Grant & Company 177 Crescent Drive Collierville, TN 38017 Tel: 901-854-0525 x 141 kimbrown@grantnewhomes.com	First Term: 12/14/15-6/30/19 Appointed Chairman on 7/25/2017	Homebuilding (Governor) Committee: THDA Board of Directors	Shelby White Female
Dorothy L. Cleaves SunTrust Bank Mail Code TN-MEM-7030 999 S. Shady Grove Road, Suite 100 Memphis, TN 38120 Tel: 901-7678770 dorothy.l.cleaves@suntrust.com	First Term: 7/1/12-6/30/16 Second Term: 7/1/16-6/30/20	Mortgage Banking (Governor) Committee: Audit & Budget Lending (Chair)	Shelby African American Female
Daisy Fields 1590 Airport Drive, Apt 1013 Gallatin, TN 37066 Tel: 615-589-4191 dfieldsh4@gmail.com	First Term: 1/12/2016- 1/11/2020	Section 8 Resident Member (Governor) Committee: Rental Assistance	Sumner African American Female
Regina Hubbard Fast Track Realty 1045 South Yates Road Memphis, TN 38119 Tel: 901-795-5050 reginahubbard4@hotmail.com	First Term: 7/1/16-6/30/20	Licensed Real Estate Broker (Governor) Committee: Lending Rental Assistance	Shelby African American Female
Open Position as of 12/08/2017		Not for Profit Corporation (Governor)	
Austin L. McMullen Bradley Arant Boult Cummings LLP 1600 Division Street, Suite 700 Nashville, TN 37203 Tel: 615-252-2307 amcmullen@bradley.com	First Term: 3/31/17-6/30/19	Speaker of the House Appointee (Harwell) Committee: Audit & Budget Grants	Davidson White Male
John K. Snodderly LaFollette Housing Authority 802 South Fourth Street LaFollette, TN 37766 Tel: 423-562-2261 john@lafollettehousing.org	First Term: 6/21/17-6/30/19	Local Public Housing Authority (Governor) Committee: Rental Assistance (Chair)	Campbell White Male

Lynn Tully City of Kingsport 225 West Center Street Kingsport, TN 37660 Tel: 423 229-9319 lynntully@kingsporttn.gov	First Term: 7/1/16-6/30/20	Local Government (Governor) Committee: Grants Tax Credits (Chair)	Sullivan Asian/White Female
Pieter van Vuuren First National Bank of Middle Tennessee 200 East Main Street McMinnville, TN 37110 Tel: (931) 473-4402 pvanvuuren@fnbmt.com	First Term: 8/5/15-6/30/19	Speaker of the Senate Appointee (Ramsey) Committee: Audit & Budget Grants (Chair) Tax Credit	Warren White Male
Todd Skelton Deputy Counsel to Governor Bill Haslam State Capitol, Office of the Governor 600 Charlotte Avenue, Suite G-10 Nashville, TN 37243 Tel: 615-741-3761 todd.skelton@tn.gov	Ex-Officio	Governor's Representative (Governor) Committee: Lending Rental Assistance	Davidson White Male
Mary Mac Robinson Wilson Sacred Heart Cathedral 2911 Tooles Bend Road Knoxville, TN 37922 Tel: 865-588-0249 mwilson@dioknox.org	First Term: 8/21/17-6/30/21	East Tennessee Public Member (Governor) Committee: Lending	Knox White Female
Larry Martin Commissioner Finance & Administration 600 Charlotte Avenue State Capitol, First Floor Nashville, TN 37243-0285 Tel: 615-741-2401 larry.martin@tn.gov	Ex-Officio	Commissioner of F & A Rep: Samantha Wilson Samantha.Wilson@tn.gov Snodgrass Tower, 18 th Fl 312 Rosa L. Parks Blvd (615) 770-1119 Committees: Bond Finance Lending Tax Credits	Knox White Male

Tre Hargett Secretary of State 600 Charlotte Avenue State Capitol, First Floor Nashville, TN 37243-0305 Tel: 615-741-2819 tre.hargett@tn.gov	Ex-Officio Current 4 Year Term: 01/2017-01/2021	State Officer Rep: Keith Boring Keith.Boring@tn.gov Tenn Tower, 7 th Fl 312 Rosa L Parks Avenue (615) 741-2819 Committees: Audit & Budget Bond Finance Grants	Hendersonville White Male
David Lillard State Treasurer 600 Charlotte Avenue State Capitol, First Floor Nashville, TN 37243-0225 Tel: 615-741-2956 david.lillard@tn.gov	Ex-Officio Current 2 Year Term: 01/2017-01/2019	State Officer Rep: Courtney Hess Courtney.Hess@tn.gov Andrew Jackson Bldg, 13 th Fl (615) 532-3067 Committees: Audit & Budget Bond Finance Tax Credits	Davidson White Male
Justin Wilson Comptroller of the Treasury 600 Charlotte Avenue State Capitol, First Floor Nashville, TN 37243-0260 Tel: 615-741-2501 justin.wilson@cot.tn.gov	Ex-Officio Current 2 Year Term: 01/2017-01/2019	State Officer Reps: Jason Mumpower [BOD & GC] jason.mumpower@cot.tn.gov State Cap, 1 st Fl; 600 Charlotte (615) 741-2501 Ann Butterworth [BFC] ann.butterworth@cot.tn.gov James K Polk Bldg; 17 th Fl (615) 401-7910 Committees: Bond Finance Grants	Davidson White Male

Executive





NON-DISCRIMINATION IN PROVISION OF SERVICES POLICY

Purpose: To require all staff members directly providing benefits to the public, and all partners receiving THDA funds that directly provide a benefit to the public, be non-discriminatory.

Effective Date: October 1, 2012

Application: This policy applies to all THDA staff and contracts with Partners to provide benefits to the public.

Policy Statement: The intent of this policy is to provide guidance to THDA staff in preventing discrimination on the basis of race, color, religion, national origin, sex, familial status, disability and any other class protected under state or federal law in providing benefits to the public.

Responsibility: No staff person or partner of THDA shall engage in discriminatory practices. A discriminatory practice occurs any time a recipient of or applicant for services is denied services or has some other negative action taken toward that resident or applicant because of membership in the protected class.

Guidelines: Every contract to provide funding for services through THDA partners shall include language in the contract that establishes an affirmative obligation to not discriminate against any individual on the basis of that individual's membership in a class listed in this policy. Every staff person shall report any suspected discriminatory conduct by a partner or staff member to a member of Leadership, the Office of Chief Legal Counsel, or the Division of Internal Audit. The Division of Internal Audit shall perform any investigations into allegations of discrimination under this policy.

Consequences: Any employee who fails to comply with this policy or who encourages such conduct by others may be subject to corrective action in accordance with THDA's Discipline Policy up to and including termination of employment. Any partner who fails to comply with a contractual obligation not to discriminate shall face loss of funding or such other consequences as determined in the contract with THDA.

Other Laws and Policies: Should this policy conflict with any state or federal law, this policy shall be superseded to the extent necessary to comply with the law.

Amendments: This policy is subject to modification, amendment or revocation at any time at the sole discretion of THDA.

Approved by:

A handwritten signature in black ink, appearing to read "Ted R. Fellman", written over a horizontal line.

Ted R. Fellman, Executive Director

A handwritten date "9-21-12" in black ink, written over a horizontal line.

Date

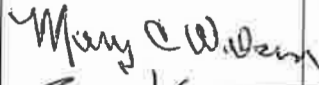
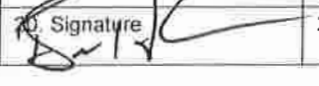
ATTACHMENT: Indirect Cost Rate Provision for ESG Funding Approval/Agreement

Emergency Solutions Grants Program
 Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act,
 42 U.S.C. 11371 et seq.
 CFDA Number 14.231

U.S. Department of Housing and Urban
 Development
 Office of Community Planning and Development

1. Recipient Name and Address Tennessee Housing Development Agency 502 Deaderick St Nashville, TN 37243		2. Unique Federal Award Identification Number: E17DC470001	
		3. Tax Identification Number: 626001445	
		4. Unique Entity Identifier (DUNS): 878047489	
5. Fiscal Year (yyyy): 2017			
6. Previous Obligation (Enter "0" for initial Fiscal Year allocation)		\$0	
7. Amount of Funds Obligated or Deobligated by This Action (+ or -)		\$3,640,860.00	
8. Total Amount of Federal Funds Obligated		\$3,640,860.00	
9. Total Required Match: \$			
10. Start Date of Recipient's Program Year (mm/dd/yyyy) 07/01/17		11. Date HUD Received Recipient's Consolidated Plan Submission (mm/dd/yyyy) 07/26/2017	12. Period of Performance Start Date (the later of the dates listed in Boxes 10 and 11) (mm/dd/yyyy) 07/26/2017
13. Type of Agreement (check applicable box) <input checked="" type="checkbox"/> Initial Agreement (Purpose #1 – Initial Fiscal Year allocation) <input type="checkbox"/> Amendment (Purpose #2 – Deobligation of funds) <input type="checkbox"/> Amendment (Purpose #3 – Obligation of additional funds)		14. Special Conditions <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/> Attached 15. Period of Performance End Date (mm/dd/yyyy) 07/25/2019	

General Terms and Conditions: This Agreement between the U.S. Department of Housing and Urban Development (HUD) and the Recipient is made pursuant to the authority of Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371 et seq.). The Recipient's Consolidated Plan submissions (including the Recipient's approved annual Action Plan and any amendments completed in accordance with 24 CFR Part 91), the Emergency Solutions Grants Program regulations at 24 CFR Part 576 (as now in effect and as may be amended from time to time), and this Agreement, including any special conditions attached to this Agreement, constitute part of this Agreement. Subject to the terms and conditions of this Agreement, HUD will make the funds for the specified Fiscal Year available to the Recipient upon execution of this Agreement by the Recipient and HUD. All funds for the specified Fiscal Year that HUD provides by reallocation are covered by this Agreement upon execution of an amendment by HUD, without the Recipient's execution of the amendment or other consent. The Recipient agrees to assume all of the responsibilities with respect to environmental review, decision making, and action required under the HUD regulations at 24 CFR Part 58. Nothing in this Agreement shall be construed as creating or justifying any claim against the federal government or the Recipient by any third party. To the extent authorized by HUD regulations at 24 CFR Part 576, HUD may, by its execution of an amendment, deobligate funds previously awarded to the Recipient without the Recipient's execution of the amendment or other consent.

16. For the U.S. Department of HUD (Name, Title, and Contact Information of Authorized Official) Mary Wilson		17. Signature 	18. Date (mm/dd/yyyy) 09 /22 /2017
19. For the Recipient (Name and Title of Authorized Official) Bill Haslam, Governor		20. Signature 	21. Date (mm/dd/yyyy) 9 / 25 / 17
Funding Information (HUD Accounting Use Only):			
PAS Code: HAES	Region: 04	Program Code: SOG	
Appropriation: 90192	Office: 37 (Knoxville)	Allotment: 867	
Appro Symbol: "Q"			

ATTACHMENT: Indirect Cost Rate Provision for ESG

Indirect Cost Rate Provision (to be added to Special Conditions attached to each ESG Agreement)

If the funds provided under this Agreement will be used for payment of the Recipient's indirect costs pursuant to 2 CFR 200, Subpart E—Cost Principles, attach a schedule in the format set forth below to the executed Agreement that is returned to HUD. The schedule shall identify each department/agency of the Recipient that will carry out activities with funds provided under this Agreement, the indirect cost rate applicable to that department/agency (including if the de minimis rate is charged under 2 CFR 200.414), and the direct cost base to which that rate will be applied. Do not include indirect cost rates for subrecipients.

<u>Recipient Department/Agency</u>	<u>Indirect cost rate</u>	<u>Direct Cost Base</u>
<u>THDA</u>	<u>30.5</u> %	<u>\$31,666,772</u>
<u> </u>	<u> </u> %	<u> </u>
<u> </u>	<u> </u> %	<u> </u>



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Financial Management Center
2380 McGee Street, Suite 400
Kansas City, MO 64108-2605

OFFICE OF PUBLIC AND INDIAN HOUSING

June 28, 2018

TN903
TENNESSEE HOUSING DEV AGENCY
502 DEADERICK STREET
NASHVILLE, TN 37243

Dear Executive Director:

Subject: Notification of Monthly Disbursement Schedule for Mainstream 5 Payments and
Administrative Fees

This email serves as HUD's notification that funding will be disbursed for your agency's Mainstream 5 program. Attached you will find the current disbursement schedule reflecting the monthly MS5 HAP and/or Administrative Fee amounts.

If you have any questions regarding how the monthly disbursement amounts were derived, please contact your Financial Analyst at the FMC.

Sincerely,

Roxanne Byers

Digitally signed by Roxanne Byers
DN: CN = Roxanne Byers, C = US, OU
= Division Director
Reason: I am approving this document

Division Director

Enclosure

Memo Reference: 18-175

Mainstream 5 Program

Disbursement Schedule

FO Code: 4LPH
HA Name: TENNESSEE HOUSING DEV AGENCY
HA Number: TN903
FYE: 06/30

Month	MS5 Disbursement	AF Disbursement
July 2017	\$18,906	\$2,229
July 2017		\$234
August 2017	\$18,906	\$2,231
September 2017	\$18,906	\$2,231
October 2017	\$18,906	\$2,231
November 2017	\$18,936	\$2,231
December 2017	\$8,256	\$2,231
January 2018	\$18,936	\$2,671
February 2018	\$18,936	\$2,671
February 2018		\$3,027
March 2018	\$18,936	\$3,089
April 2018	\$19,599	\$3,089
May 2018	\$19,599	\$3,089
May 2018		\$6,911
June 2018	\$19,688	\$2,842
July 2018	\$19,688	\$2,842
August 2018	\$19,688	\$2,842
September 2018	\$19,688	\$2,842
October 2018	\$19,688	\$2,842
November 2018		\$2,842
December 2018		\$2,842



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Financial Management Center
2380 McGee Street, Suite 400
Kansas City, MO 64108-2605

OFFICE OF PUBLIC AND INDIAN HOUSING

June 28, 2018

TN903
TENNESSEE HOUSING DEV AGENCY
502 DEADERICK STREET
NASHVILLE, TN 37243

Dear Executive Director:

Subject: Notification of Monthly Disbursement Schedule for Housing Assistance Payments and Administrative Fees

This email serves as HUD's notification that funding will be disbursed for your agency's Housing Choice Voucher (HCV) program. Attached you will find the current disbursement schedule reflecting the monthly HAP and/or Administrative Fee amounts. A separate notification will be provided to your agency for new units and funding received or program specific reductions.

If you have any questions regarding how the monthly disbursement amounts were derived, please contact your Financial Analyst at the FMC.

Sincerely,

Roxanne Byers

Digitally signed by Roxanne Byers
DN: CN = Roxanne Byers, C = US, OU
= Division Director
Reason: I am approving this document

Division Director

Enclosure

Memo Reference: 18-176

Housing Choice Voucher Program

Disbursement Schedule

FO Code: 4LPH
HA Name: TENNESSEE HOUSING DEV AGENCY
HA Number: TN903
FYE: 06/30

Month	HAP Disbursement	AF Disbursement
July 2017	\$3,078,532	\$324,297
August 2017	\$3,078,532	\$324,297
August 2017		\$1,200
September 2017	\$3,078,532	\$324,297
October 2017	\$3,078,532	\$324,297
November 2017	\$3,129,209	\$300,027
December 2017	\$3,079,817	\$300,027
January 2018	\$3,059,952	\$325,829
February 2018	\$2,992,385	\$325,830
February 2018		\$556,895
March 2018	\$2,970,404	\$388,390
April 2018	\$2,967,369	\$388,390
May 2018	\$2,969,648	\$373,910
June 2018	\$2,613,291	\$373,910
June 2018	\$1,334	\$600
June 2018		\$668,613
July 2018	\$2,969,648	\$373,910
July 2018	\$1,342	
August 2018		\$373,910
August 2018	\$1,334	
September 2018		\$373,910
September 2018	\$1,334	
October 2018	\$1,334	
November 2018	\$1,334	
December 2018	\$1,334	
January 2019	\$1,334	
February 2019	\$1,334	
March 2019	\$1,334	
April 2019	\$1,334	
May 2019	\$1,334	

Received

Funding Approval and HOME Investment Partnerships Agreement

Title II of the National Affordable Housing Act of 1990

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

1. Participant Name and Address Tennessee Housing Development Agency Andrew Jackson Building 502 Deaderick Street, Third Floor Nashville, TN 37243		2. Grant Number: M17-SG470100	
		3a. Tax Identification Number: 626001445	3b. Unique Entity Identifier (formerly DUNS): 879015923
		4. Appropriation Number 86 7/0 0205	5. FY (yyyy) 2017
6. Previous Obligation (Enter "0" for initial FY allocation)			\$0.00
a. Formula Funds		\$9,582,153.00	
b. Community Housing Development Org. (CHDO) Competitive		\$	
7. Current Transaction (+ or -)			\$9,582,153.00
a. Formula Funds		\$9,582,153.00	
1. CHDO (For deobligations only)		\$	
2. Non- CHDO (For deobligations only)		\$	
b. CHDO Competitive Reallocation or Deobligation		\$	
8. Revised Obligation			\$
a. Formula Funds		\$	
b. CHDO Competitive Reallocation		\$	
9. Special Conditions (check applicable box) <input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Attached		10. Date of Obligation (Congressional Release Date) (mm/dd/yyyy): 09/22/2017	
11. Indirect Cost Rate*		12. Period of Performance: Date in Box #10 - 09/01/2025	
<u>Administering Agency/Dept.</u> THDA	<u>Indirect Cost Rate</u> 30.5 %	<u>Direct Cost Base</u> \$31,666,772	* If funding assistance will be used for payment of indirect costs pursuant to 2 CFR 200, Subpart E-Cost Principles, provide the name of the department/agency, its indirect cost rate (including if the de minimis rate is charged per 2 § CFR 200.414), and the direct cost base to which the rate will be applied. Do not include cost rates for subrecipients.
—	— %		
—	— %		
—	— %		

This Agreement between the Department of Housing and Urban Development (HUD) and the Participating Jurisdiction/Entity is made pursuant to the authority of the HOME Investment Partnerships Act (42 U.S.C. 12701 et seq.). The Participating Jurisdiction's /Entity's approved Consolidated Plan submission/Application and the HUD regulations at 24 CFR Part 92 (as is now in effect and as may be amended from time to time) and this HOME Investment Partnership Agreement, form HUD-40093, including any special conditions, constitute part of this Agreement. Subject to the provisions of this Agreement, HUD will make the funds for the Fiscal Year specified, available to the Participating Jurisdiction/Entity upon execution of this Agreement by the parties. All funds for the specified Fiscal Year provided by HUD by formula reallocation are covered by this Agreement upon execution of an amendment by HUD, without the Participating Jurisdiction's execution of the amendment or other consent. HUD's payment of funds under this Agreement is subject to the Participating Jurisdiction's/Entity's compliance with HUD's electronic funds transfer and information reporting procedures issued pursuant to 24 CFR 92.502. To the extent authorized by HUD regulations at 24 CFR Part 92, HUD may, by its execution of an amendment, deobligate funds previously awarded to the Participating Jurisdiction/Entity without the Participating Jurisdiction's/Entity's execution of the amendment or other consent. The Participating Jurisdiction/Entity agrees that funds invested in affordable housing under 24 CFR Part 92 are repayable when the housing no longer qualifies as affordable housing. Repayment shall be made as specified in 24 CFR Part 92. The Participating Jurisdiction agrees to assume all of the responsibility for environmental review, decision making, and actions, as specified and required in regulation at 24 CFR 92.352 and 24 CFR Part 58.

The Grantee shall comply with requirements established by the Office of Management and Budget (OMB) concerning the Universal Numbering System and System for Award Management (SAM) requirements in Appendix A to 2 CFR part 25, and the Federal Funding Accountability and Transparency Act (FFATA) in Appendix A to 2 CFR part 170.

The Period of Performance for the funding assistance shall begin on the date specified in item 12 and shall end on September 1st of the 5th fiscal year after the expiration of the period of availability for obligation. Funds remaining in the account will be cancelled and thereafter not available for obligation or expenditure for any purpose. Per 31 U.S.C. 1552: The grantee shall not incur any obligations to be paid with such assistance after the end of the Period of Performance.

13. For the U.S. Department of HUD (Name and Title of Authorized Official) Mary Wilson - HUD Community Planning and Development Director	14. Signature 	15. Date 09 / 22 / 2017
16. For the Participating Jurisdiction/Entity (Name and Title of Authorized Official)	17. Signature 	18. Date 9/27/2017

19. Check one:

☒ Initial Agreement☐ Amendment #

20. Funding Information:

Source of Funds	HOME Appropriation Code	PAS Code	Amount
2017	867/00205	HMF	\$9,528,253.00
2015	865/80205	HMF	\$43,057.00
2016	866/90205	HMF	\$10,843.00
2016x	86X0205 - 16	HMF	\$.00
2017x	86X0205 - 17	HMF	\$.00



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of Grants Management 330 C St., S.W., Washington DC 20201

April 24, 2018

CONTROLLER
TENNESSEE HOUSING DEVELOPMENT AGENCY
404 JAMES ROBERTSON PARKWAY, SUITE 1200
NASHVILLE, TENNESSEE 37248 0900

Re: Notice of Grant Award - FY 2018

Dear Grantee:

This grant award represents the allocation for fiscal year 2018 to the State for the Low Income Home Energy Assistance program made available under Public Law 115-141.

Appropriation	CAN	Allotment	This Action	Cumulative
75-18-1502	2018,G992201	\$63,972,029	\$10,647,078	\$63,972,029
	Total	\$63,972,029	\$10,647,078	\$63,972,029

EIN: 1626001445N9

Fiscal Year: 2018

Document Number: G-1801TNLIEA

CFDA #: 93.568

Grant Period: 10-01-2017 - 09-30-2019

Funds must be expended in accordance with Title XXVI of Public Law 97-35, as amended, your assurances and plan submitted in accordance with 45 CFR Part 96 and 31 CFR Part 205, which implements the Cash Management Improvement Act of 1990, and procedures applicable to the expenditure of your revenues. Section 2605(d) of P.L. 97-35 requires the State to expend funds in accordance with the State Plan. Determinations as to whether the State has complied with these requirements may be made as the result of the audit required by Section 2605(e) of P.L. 97-35 and the Single Audit Act of 1984, or as the result of reviews conducted under Section 2608 of P.L. 97-35. Although the grant period shown is through 09-30-2019, Sec. 2607 of P.L. 97-35, as amended requires that at least 90 percent of the amount payable to you must be obligated no later than 09-30-2018.

Funds included in this award will be made available through the DHHS Payment Management System (PMS). Questions pertaining to payments should be directed to DHHS Division of Payment Management, Post Office Box 6021, Rockville, MD 20852; telephone 1-877-614-5533.

Program questions about this grant should be referred to Lauren Christopher at (202) 401-4870. Fiscal reporting questions regarding this grant should be directed to Lydia Peele, Administration for Children and Families, (202) 401-6493. The electronic Terms and Conditions that apply to this program can be found at <https://www.acf.hhs.gov/grants/terms-and-conditions>.

Please transmit a copy of this letter to the office authorized to request funds covered by this award.

Sincerely,

Daphne Weeden
Grants Officer

This award represents the remaining funding available for your LIHEAP under the Consolidated Appropriations Act, 2018 (Public Law 115-141).

Housing Trust Fund (HTF) Grant Agreement

Section 1338, Federal Housing Enterprises Financial Safety and Soundness Act (FHEFSSA)
(CFDA # 14.275)

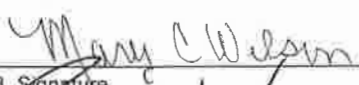
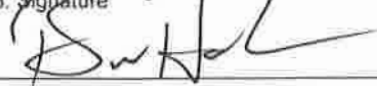
U.S. Department of Housing and Urban Development
Office of Community Planning and Development

1. Grantee Name and Address Tennessee Housing Development Agency 502 Deaderick St Nashville, TN 37243-0200		2. Grant Number F17-SG470100	
		3. Tax Identification Number 626001445	4. Unique Entity Identifier (formerly DUNS) 878047489
		5. Appropriation Number 86 X 8560	6. FY (yyyy) 2017
7. Previous Obligation (Enter "0" for initial FY allocation)			\$0
a. Formula Funds			\$
8. Current Transaction (+ or -)			\$3,160,279.00
a. Formula Funds			\$3,160,279.00
9. Revised Obligation			\$
a. Formula Funds			\$
10. Special Conditions (check applicable box) <input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Attached		11. Date of Obligation (Congressional Release Date) (mm/dd/yyyy) 09 /22/2017	
12. Indirect Cost Rate*		13. Period of Performance Date in Box #11 – 09/22/2024	
<u>Administering Agency/Dept.</u>	<u>Indirect Cost Rate</u>	<u>Direct Cost Base</u>	
—	—%		
—	—%		
—	—%		
—	—%		

* If funding assistance will be used for payment of indirect costs pursuant to 2 CFR 200, Subpart E-Cost Principles, provide the name of the department/agency, its indirect cost rate (including if the de minimis rate is charged per 2 § CFR 200.414), and the direct cost base to which the rate will be applied. Do not include cost rates for subrecipients

This Agreement between the Department of Housing and Urban Development (HUD) and the Grantee is made pursuant to the authority of section 1338 of the Federal Housing Enterprises Financial Safety and Soundness Act of 1992, 12 U.S.C. 4568. The Grantee's approved Consolidated Plan submission/Application and the HUD regulations at 24 CFR part 93, which can be found at www.hud.exchange.info/htf, (as is now in effect and as may be amended from time to time) and this Housing Trust Fund Grant Agreement, form HUD-40094, including any special conditions, constitute part of this Agreement. Subject to the provisions of this Agreement, HUD will make the funds for the Fiscal Year specified, available to the Grantee upon execution of this Agreement by the parties. HUD's payment of funds under this Agreement is subject to the Grantee's compliance with HUD's electronic funds transfer and information reporting procedures issued pursuant to 24 CFR 93.402. To the extent authorized by HUD regulations at 24 CFR part 93, HUD may, by its execution of an amendment, deobligate funds previously awarded to the Grantee without the Grantee's execution of the amendment or other consent.

The Grantee shall comply with requirements established by the Office of Management and Budget (OMB) concerning the Universal Numbering System and System for Award Management (SAM) requirements in Appendix A to 2 CFR part 25, and the Federal Funding Accountability and Transparency Act (FFATA) in Appendix A to 2 CFR part 170.

14. For the U.S. Department of HUD (Name and Title of Authorized Official) Mary C. Wilson, Director CPD	15. Signature 	16. Date 09/22/2017
17. For the Grantee (Name and Title of Authorized Official) Bill Haslam, Governor	18. Signature 	19. Date 9 /25/17

20. Check one:

☒ Initial Agreement ☐ Amendment #

21. Funding Information: HTF

Source of Funds	Appropriation Code	PAS Code	Amount
2017	86 X 8560-17	HTF (FYI: B)	\$3,159,741.00
2016	86 X 8560-16	HTF (FYI: A)	\$ 538.00

ASSISTANCE AGREEMENT				
1. Award No. DE-EE0007951		2. Modification No. 0002	3. Effective Date 07/01/2017	4. CFDA No. 81.042
5. Awarded To TENNESSEE HOUSING DEVELOPMENT AGENCY Attn: DON WATT ANDREW JACKSON BUILDING 502 DEADERICK STREET THIRD FLOOR NASHVILLE TN 37243		6. Sponsoring Office Energy Effcy & Renewable Energy		7. Period of Performance 07/01/2017 through 06/30/2019
8. Type of Agreement <input checked="" type="checkbox"/> Grant <input type="checkbox"/> Cooperative Agreement <input type="checkbox"/> Other	9. Authority Public Law 109-58, Energy Policy Act (2005)		10. Purchase Request or Funding Document No. 18EE005705	
11. Remittance Address TENNESSEE HOUSING DEVELOPMENT AGENCY Attn: RALPH PERREY ANDREW JACKSON BUILDING 502 DEADERICK ST THIRD FLOOR NASHVILLE TN 37243		12. Total Amount Govt. Share: \$9,021,955.00 Cost Share : \$0.00 Total : \$9,021,955.00		13. Funds Obligated This action: \$4,739,600.00 Total : \$9,021,955.00
14. Principal Investigator See Pg. 2 of Assistance Agrmnt	15. Program Manager Jonny M. Muckey Phone: 202-287-1809		16. Administrator Golden Field Office U.S. Department of Energy Golden Field Office 15013 Denver West Parkway Golden CO 80401	
17. Submit Payment Requests To		18. Paying Office		19. Submit Reports To See Reporting Checklist
20. Accounting and Appropriation Data See Schedule				
21. Research Title and/or Description of Project WEATHERIZATION ASSISTANCE PROGRAM - TENNESSEE				
For the Recipient		For the United States of America		
22. Signature of Person Authorized to Sign		25. Signature of Grants/Agreements Officer Signature on File File		
23. Name and Title	24. Date Signed	26. Name of Officer Andrew J. Rittgers		27. Date Signed 07/16/2018

CONTINUATION SHEET	REFERENCE NO. OF DOCUMENT BEING CONTINUED DE-EE0007951/0002	PAGE OF 2 3
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NAME OF OFFEROR OR CONTRACTOR

TENNESSEE HOUSING DEVELOPMENT AGENCY

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
	<p>DUNS Number: 878047489</p> <p>In addition to this Assistance Agreement, this award consists of the items listed on the Cover Page of the Special Terms and Conditions.</p> <p>Current Budget Period: 07/01/2018 - 06/30/2019 Project Period: 07/01/2017 - 06/30/2020</p> <p>In Block 7 of the Assistance Agreement, the Period of Performance reflects the beginning of the Project Period through the end of the current Budget Period.</p> <p>The purpose of this action is to obligate Program Year 2018 funds and to authorize performance of Program Year 2018 activities.</p> <p>Funding for all awards and future budget periods is contingent upon the availability of funds appropriated by Congress for the purpose of this program and the availability of future-year budget authority.</p> <p>DOE Award Administrator: Jon Krieger E-mail: jon.krieger@ee.doe.gov Phone: 240-562-1626</p> <p>DOE Project Officer: Jon Muckey E-mail: jon.muckey@ee.doe.gov Phone: 202-287-1809</p> <p>Recipient Business Officer: Ralph M. Perrey E-mail: RPerrey@thda.org Phone: 615-815-2200</p> <p>Recipient Principal Investigator: Blake Worthington E-mail: BWorthington@thda.org Phone: 615-815-2042</p> <p>"Electronic signature or signatures as used in this document means a method of signing an electronic message that-- (A) Identifies and authenticates a particular person as the source of the electronic message; (B) Indicates such person's approval of the information contained in the electronic message; and, (C) Submission via FedConnect constitutes electronically signed documents." Continued ...</p> <p>ASAP: YES Extent Competed: NOT AVAIL FOR COMP</p>				

Appendix D: WAP Assurance						
CONTINUATION SHEET		REFERENCE NO. OF DOCUMENT BEING CONTINUED DE-EE0007951/0002			PAGE 3	OF 3
NAME OF OFFEROR OR CONTRACTOR TENNESSEE HOUSING DEVELOPMENT AGENCY						
ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)	
	Davis-Bacon Act: NO					

JULY 2004

[illegible]

Appendix D: WAP Assurance

CONTINUATION SHEET		REFERENCE NO. OF DOCUMENT BEING CONTINUED DE-EE0007951/0002				PAGE 3	OF 3
NAME OF OFFEROR OR CONTRACTOR TENNESSEE HOUSING DEVELOPMENT AGENCY							
ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)		
	Davis-Bacon Act: NO						

JULY 2004

[illegible][illegible][illegible]

Interpretation Services for THDA consumers with limited English proficiency (LEP)

THDA serves consumers with limited English proficiency (LEP) by utilizing the telephone-based language interpreting service, AVAZA (sometimes called the “language line”). The use of an interpreter should be offered to consumers who may have difficulty understanding or speaking English. There are two ways that persons with LEP will come in contact with THDA: in person or on the phone.

When a caller or visitor with limited English proficiency (LEP) contacts THDA, THDA must provide language assistance to ensure that the consumer can access THDA services for which he/she may be eligible. There are two primary ways that THDA can serve those with LEP.

- By connecting with an AVAZA language line interpreter (7:00 am to 5:00 pm CST)
- By using an interpreter that the client/customer has brought with him/her to the office. An interpreter supplied by the customer must adhere to THDA’s LEP Policy.

For Telephone Inquiries

- 1) Be friendly, speak slowly and in simple phrases. Examples of common phrases to use include:
 - a. I will help you
 - b. Please wait
 - c. One minute
 - d. I am getting an interpreter
 - e. I understand
- 2) Let the caller know to please wait for an interpreter that will be provided. Using three-way calling procedures, call the appropriate AVAZA number based upon the office (see below).

THDA Office Location	AVAZA Contact Number
Central & Middle Tennessee Offices	615.534.3400
All Other Offices	1.800.482.8292

Instructions for setting up the three-way conference call on the Cisco phone system are as follows:

While the caller is on phone:

- press the MORE soft key
- Press CONFRN soft key
- Key in phone number or extension number to add in another caller (include ‘9’ for outside numbers)
- Then press CONF to bring in all the users
- Repeat process for multiple users – up to 4

AVAZA will ask the following:

- For you to press ‘1’ to be connected with a Spanish interpreter or ‘2’ to be connected to someone to help with all other languages,
- Your name,
- **THDA Access code # 36977**, and

- The caller's language, if known. When the language is not known:
 - Let AVAZA know that you are unsure of the language.
 - AVAZA will put the call on hold while getting a language appropriate interpreter.
- 3) How to conduct the telephone call:
- a. AVAZA will get an appropriate interpreter on the phone. The THDA staff member introduces him/herself to the interpreter and lets them know what language the caller speaks, if known.
 - b. AVAZA will engage the caller and repeat the conversation back to you. Speak to the interpreter as if you are speaking to the caller. The interpreter will interpret as if the caller is talking to you.
 - c. When another THDA staff member is needed to assist the caller, contact the other staff member and let him/her know that AVAZA and another caller are on the phone. Check to see if he/she is available to assist. If available, add the staff member to the conference call. If the staff member is not available, then see step 'e'.
 - d. At this point, the initial THDA contact person can disconnect, leaving the caller, the AVAZA interpreter and the appropriate THDA contact on the phone.
 - e. The conversation will continue until the caller is assisted and his/her questions are answered or a time can be arranged for another THDA staff member to answer the questions, with the AVAZA interpreter assisting. If a follow up call is required, the THDA staff member must ensure that all follow-up details and plans are understood by the caller.
 - f. To end the session with the AVAZA interpreter say "end of session", upon completion. Please ensure that the AVAZA interpreter has hung up before you disconnect from the call. Only when all conversation with the caller is complete does the THDA staff member disconnect with AVAZA.

For In-Person Inquiries

- 1) Be friendly, speak slowly and in simple phrases. Examples of common phrases to use include:
 - a. I will help you
 - b. Please wait
 - c. One minute
 - d. I am getting an interpreter
 - e. I understand
- 2) Try to identify the client/visitor's language by using the Language Identification Guide provided by AVAZA that allows the client/visitor to identify their language.
- 3) Once the language is identified, call the appropriate AVAZA number for the office location following the instructions above.
- 4) Once the interpreter is secured, place the call on speaker phone to allow both the THDA staff member and client/visitor to speak through the interpreter.

After each encounter with someone with LEP

Each time a THDA staff member has an in-person or telephone encounter with someone with LEP, this encounter must be tracked through a quick survey located on the intranet.

- 1) Go to the THDA intranet homepage
- 2) On the top under 'THDA Links,' click on 'Limited English Proficiency (LEP) Encounter'
- 3) Click on the 'Respond to this Survey' button
- 4) You will be asked five questions:
 1. What type of communication did you have (phone, in-person, other)
 2. What type of interpreter services were used to help the person with LEP
 3. What language was the person speaking
 4. What type of information/assistance was the person seeking, if known. It is not necessary to ask for any extra information so that you can answer this question.
 5. An optional question asks if there are any other details or information that is pertinent to tracking this call.

This encounter survey should be filled out upon each encounter with a client/visitor, even if it is a client/visitor that contacts us often. This survey should also be filled out for an encounter, even if the caller/visitor refuses the interpreter services. The goal of the survey is to collect data on the volume of contacts we have with persons with LEP to inform our internal and external reporting. Only one staff member needs to fill out the survey. If you end up transferring the person to another THDA staff member, the staff member who completes the call is the one who needs to fill out the online survey.

NOTICE

The Tennessee Housing Development Agency (THDA) has released a draft of the 2018-2019 Annual Action Plan for the State of Tennessee. This plan is submitted annually to the U.S. Department of Housing and Urban Development to outline the estimated budget and goals for housing and community development activities by the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), HOME Investment Partnerships (HOME), Housing Opportunities for Persons with AIDS (HOPWA), and Housing Trust Fund (HTF) programs. Citizens are encouraged to review and make comments on information contained in the plan. A summary of the plan is available for review and public comment at www.thda.org/about-thda/public-notice-and-comment. Use "Select Language" at the bottom of the page for multiple translations. Links will also be available on the websites of the State of Tennessee, TN Department of Economic and Community Development, TN Department of Health, and each of the nine Development Districts of Tennessee. Written comments via electronic submission on the THDA website will be accepted from March 26 – April 25, 2018.

Additionally, the State of Tennessee is seeking public comments on fair housing and our Analysis of Impediments to Fair Housing Choice. More information and a survey will be available on www.thda.org/about-thda/public-notice-and-comment. Written comments via electronic submission on the THDA website will be accepted from March 26 – April 25, 2018.

A public hearing to obtain input on the 2018-19 Annual Action Plan and our Analysis of Impediments to Fair Housing Choice will be held on April 12, 2018 from 11:00 a.m. to 1:00 p.m. in Nashville, TN at the Andrew Jackson Building, 502 Deaderick St., Ground Floor Public Hearing Room (enter from 5th Ave N). For questions and accommodations, please email Megan Webb at mwebb@thda.org.

بيان

لقد أصدرت "وكالة تينيسي لتنمية الإسكان" (THDA، Tennessee Housing Development Agency) مسودة "خطة العمل السنوية" (Annual Action Plan) 2018-2019 لولاية تينيسي. وهذه الخطة مقدمة سنوياً لـ "الوزارة الأمريكية للإسكان والتنمية الحضرية" (U.S. Department of Housing and Urban Development) لعرض الميزانية المقررة والأهداف الخاصة بأعمال تنمية الإسكان والمجتمع التي تقوم بها برامج CDBG وESG وHOME وHOPWA وHTF. ونحث المواطنين على الإطلاع على المعلومات المتضمنة في الخطة وتقديم التعليقات عليها. وخلاصة الخطة متوفرة لإطلاع وتعليق الجمهور العام عليها على www.thda.org/about-thda/public-notice-and-comment. يرجى استخدام "Select Language" في أسفل الصفحة للحصول على ترجمات متعددة. كما ستكون الروابط متوفرة على موقعي إنترنت ولاية تينيسي، "دائرة تينيسي للتنمية الاقتصادية والمجتمعية" (TN Department of Economic & Community Development) و"دائرة تينيسي للصحة" (TN Department of Health)، وكذلك على موقع كل من "مقاطعات تنمية تينيسي" (Development Districts of Tennessee) التسع. وسيتم القبول بالتعليقات الخطية عبر تقديمها إلكترونياً على موقع إنترنت THDA من 26 مارس/آذار حتى 25 أبريل/نيسان 2018.

وبالإضافة إلى ذلك، تسعى ولاية تينيسي إلى الحصول على تعليقات الجمهور العام على الإسكان المنصف وتحليلنا لـ "الموانع أمام اختيار الإسكان المنصف" (Impediments to Fair Housing Choice). وستكون معلومات إضافية وإستطلاع متوفرين على www.thda.org/about-thda/public-notice-and-comment. وسيتم القبول بالتعليقات الخطية عبر تقديمها إلكترونياً على موقع إنترنت THDA من 26 مارس/آذار حتى 25 أبريل/نيسان 2018.

وستنعد جلسة للجمهور العام للحصول على تعليقات على خطة العمل السنوية 2018-2019 وتحليلنا للموانع أمام اختيار الإسكان المنصف، وذلك في 12 أبريل/نيسان 2018 من الساعة 11:00 صباحاً حتى الساعة 1:00 بعد الظهر في ناشفيل في تينيسي على العنوان Andrew Jackson Building, 502 Deaderick St.، قاعة الجلسات العلنية في الدور الأرضي (الدخول من 5th Ave N). ولطرح أسئلة والإستعلام عن التسهيلات، يرجى توجيه بريد إلكتروني إلى ميغان ويب (Megan Webb) على العنوان mwebb@thda.org.

داخوویانی

ناژانسا گهښه پېښېدانا مالۍ يا تننيسۍ (THDA) پېشنفيسهک ژ بهرنامهيا نوپراسپوڼۍ يا سالۍ يا 2018-2019 ژ بو پاريزگه ها تننيسۍ ومانديده. ئەف بهرنامه هر سالۍ بو وزارت مالۍ و گهښه پېښېدانا باژاري يا ناميريکايۍ تۍ رابهرکرن دا کو بوودجها تهخمينۍ و ئارمانجۍ ديارکړۍ ل واري مالۍ و کارين گهښه پېښېدانا جفاکۍ ژ ريا بهرنامهين CDBG، ESG، HOME، HOPWA و HTF و مره ديارکړن. وهلاتۍ تين هاندانۍ کو زانيارۍ و ناگاهين داناندۍ ل بهرنامهيۍ هلکولين و نيرينا خوه ل بارا وۍ راگهين. کورتميهک ژ بهرنامهيۍ ب مبهستا هلکولاندن و دهربرينا نيرينۍ ل مالپهرا www.thda.org/about-thda/public-notice-and-comment ل بهر دهسته. بژاردهيا "بژارتنا زمين" ژ بو دهستگهښتتا بو وهرگرين چهندجووره ب کار بينه. لينکين دهستگهښتنۍ هر وها ل مالپهريڼ پاريزگه ها تننيسۍ، وزارت مالپوري و جفاکۍ يا تننيسۍ، وزارت تهندوروستۍ يا تننيسۍ و هر يهک ژ نهه ناچهپين گهښه پېښېدانا بين تننيسۍ دۍ ل بهر دهست به. نيرينين نفيسکۍ بين شاندي ژ ريا فورما ئهلهکترونيکۍ يا هپي ل مالپهرا THDA دۍ ژ روژا 26 ئادار ههتا 25 نيسانا 2018 و مرن پهژراندن.

هر وها پاريزگه ها تننيسۍ هر دکه نيرينين گشتۍ ل واري مالا ئهدلانه و ئاناليزا مه ژ بهر بهرند و ئاستهنگين مالا ئهدلانه و مر بگره. زانيارين زېدهتر هر وها راپرسينۍ ل في واري دا ل مالپهرا www.thda.org/about-thda/public-notice-and-comment دۍ ل بهر دهست بن. نيرينين نفيسکۍ بين شاندي ژ ريا فورما ئهلهکترونيکۍ يا هپي ل مالپهرا THDA دۍ ژ روژا 26 ئادار ههتا 25 نيسانا 2018 و مرن پهژراندن.

جفينهکا بهيستنا گشتۍ ژ بو وهرگرنتا نيرينان ل بارا بهرنامهيا نوپراسپوڼۍ يا سالۍ يا 2018-2019 و ئاناليزا مه ژ بهر بهرندۍ بژاردهيا مالا ئهدلانه د 12 نيسانا 2018 ژ سائمت 11 سبههۍ ههتا 1 پشتۍ نيڅروژ ل ناڅنشان ژيري ل نهشويل، تننيسۍ و مره لدارخستن: Andrew Jackson Building, 502 Deaderick St., Ground Floor Public Hearing Room (ژ 5th Ave N ټيکهفن). ژ بو بهر سفدانا بو پرسان و بجهوونۍ ژ کهرما خوه دگل ئيممېلا mwebb@thda.org بکهفن ټيکليۍ.

OBAVJEŠTENJE

Agencija za stambeni razvoj savezne države Tenesi (engl. Tennessee Housing Development Agency, THDA) izdala je nacrt godišnjeg plana akcije za saveznu državu Tenesi za 2018-2019 godinu. Ovaj plan se podnosi svake godine američkom ministarstvu za stambeni i urbani razvoj da bi se opisali predviđeni budžet i ciljevi aktivnosti stambenog i komunalnog razvoja od strane Programa globalne pomoći za razvoj zajednice (CDBG), Programa donacija za rješenja u vanrednim situacijama (ESG), Programa investicijskih partnerstva (HOME), Stambenih mogućnosti za osobe sa sidom (HOPWA), kao i Programa stambene zaklade. Građani se potiču da pregledaju i komentarišu informacije sadržane u planu. Sažetak plana je dostupan za pregled i javno komentarisanje na adresi: www.thda.org/about-thda/public-notice-and-comment. Izaberite „Select Language“ na dnu stranice za prijevode na druge jezike. Linkovi će takođe biti dostupni preko internet stranica savezne države Tenesi, Ministarstva ekonomskog i komunalnog razvoja i Ministarstva zdravstva savezne države Tenesi, kao i devet razvojnih okruga države Tenesi. Pismeni komentari poslati elektronskim putem preko THDA internetskih stranica primaju se od 26. marta – 25. aprila 2018.

Osim toga, savezna država Tenesi traži javno komentarisanje o pravednom stambenom tretmanu i našoj Analizi prepreka izboru pravednog stambenog tretmana. Dodatne informacije i anketa će biti dostupni preko internet stranice: www.thda.org/about-thda/public-notice-and-comment. Pismeni komentari poslati elektronskim putem preko THDA internetskih stranica primaju se od 26. marta – 25. aprila 2018.

Javno saslušanje za pridobijanje ideja o godišnjem planu akcije za 2018-19 i našoj Analizi prepreka izboru pravednog stambenog tretmana održaće se 12. aprila 2018. od 11:00h do 1:00h u Našvilu, Tenesi u zgradi Andrew Jackson, 502 Deaderick St., Ground Floor Public Hearing Room (ulaz iz 5th Ave N). Za pitanja i smještaj pošaljite email osobi Megan Webb na mwebb@thda.org.

အသိပေးချက်

Tennessee အိမ်ရာ ဖွံ့ဖြိုးတိုးတက်မှု အေဂျင်စီ (THDA) ကနေ Tennessee ပြည်နယ်အတွက် 2018-2019 နှစ်တစ်ခုလုံးအတွက် ဆောင်ရွက်ချက် အစီအစဉ် မူကြမ်းကို ထုတ်ပြန်လိုက်ပါသည်။ CDBG ၊ ESG ၊ HOME ၊ HOPWA နှင့် HTF ပရိုဂရမ် အစီအစဉ်များ မှစီစဉ်ပေးသည့် အိမ်ရာနှင့် လူ့အသိုင်းအဝိုင်း ဖွံ့ဖြိုးတိုးတက်မှု လှုပ်ရှားမှုများအတွက် ခန့်မှန်းခြေရသုံးငွေစာရင်းနှင့် ရည်မှန်းချက်ပန်းတိုင်များကို အကြမ်း ဖော်ပြရန် ဤအစီအစဉ်ကို အမေရိကန်ပြည်ထောင်စု ဌာနဆိုင်ရာ အိမ်ရာ နှင့် မြို့ပြ ဖွံ့ဖြိုးတိုးတက်မှု သို့ နှစ်စဉ် တင်ပြပါသည်။ အစီအစဉ်ထဲတွင်ပါဝင်သည့် အချက်အလက်များအပေါ် ပြန်လည်သုံးသပ်ရန်နှင့် ထင်မြင်ချက်ပေးရန် နိုင်ငံသားများကို တိုက်တွန်းနှိုးဆော်အပ်ပါသည်။ ယခုအစီအစဉ်အကျဉ်းချုပ်ကို ပြန်လည်သုံးသပ်ရန်နှင့် ပြည်သူ့ထင်မြင်ချက်များ ပေးနိုင်ရန်အတွက် www.thda.org/about-thda/public-notice-and-commentတွင် ပြုလုပ်နိုင်ပါသည်။ ဘာသာစကားမျိုးစုံဖြင့်ဖတ်ရန်အတွက် စာမျက်နှာ၏အောက်ခြေရှိ "ဘာသာစကား ရွေးချယ်ပါ" ကို အသုံးပြုပါ။ Tennessee ပြည်နယ်၊ TN ဌာနဆိုင်ရာ စီးပွားရေးနှင့် လူ့အသိုင်းအဝိုင်း ဖွံ့ဖြိုးတိုးတက်မှု၊ TN ဌာနဆိုင်ရာ ကျန်းမာရေး၊ နှင့် Tennessee ၏ဖွံ့ဖြိုးတိုးတက်မှုဆိုင်ရာ ခရိုင်ကိုးရတ်စ်တစ် တို့၏ ဝတ်ဆိုင်များပေါ် တွင်လည်း လင့်ခ်များကို ရရှိနိုင်ပါသည်။ ထင်မြင်ချက်များကို အီလက်ထရွန်နစ်မှတစ်ဆင့် တင်ပြခြင်းကို THDA ဝတ်ဆိုင်ပေါ်တွင် 2018 ခုနှစ် March 26 ရက်ကနေ April 25 ရက် အတွင်း လက်ခံသွားမည်ဖြစ်ပါသည်။

ထို့အပြင် Tennessee ပြည်နယ်သည် ပြည်သူ့ထင်မြင်ချက်များကို အိမ်ရာ ပြပွဲနှင့် အိမ်ရာ ပြပွဲရွေးချယ်မှုသို့ ကျွန်ုပ်တို့၏ အဟန့်အတား စိစစ်ချက်များ အတွက် ပြည်သူ့ထင်မြင်ချက်များကို ရှာဖွေနေပါသည်။ နောက်ထပ် အချက်အလက်များနှင့် ခြုံငုံလေ့လာချက်များကို www.thda.org/about-thda/public-notice-and-commentတွင် ရရှိနိုင်ပါသည်။ ထင်မြင်ချက်များကို အီလက်ထရွန်နစ်မှတစ်ဆင့် တင်ပြခြင်းကို THDA ဝတ်ဆိုင်ပေါ်တွင် 2018 ခုနှစ် March 26 ရက်ကနေ April 25 ရက် အတွင်း လက်ခံသွားမည်ဖြစ်ပါသည်။

2018-19 ခုနှစ်အတွက် တစ်နှစ်ပတ်လုံး ဆောင်ရွက်ချက် အစီအစဉ် မူကြမ်းအပေါ် ဖြည့်သွင်းချက်များကိုရရှိရန်နှင့် အိမ်ရာ ပြပွဲရွေးချယ်မှုသို့ ကျွန်ုပ်တို့၏ အဟန့်အတား စိစစ်ချက်များအပေါ် ပြည်သူ့ကြားနာခြင်းကို လာမည့် April 12 ရက် 2018 ခုနှစ်၊ နံနက် 11:00 နာရီမှ ညနေ 1:00 နာရီအထိ၊ Nashville ၊ TN Andrew Jackson Building, 502 Deaderick St., Ground Floor Public Hearing Room ၌ (5th Ave N မှ ဝင်ရောက်ရန်) ပြုလုပ်သွားမည်ဖြစ်ပါသည်။ မေးခွန်းများနှင့် နေရာထိုင်ခင်းများအတွက် ကျေးဇူးပြုပြီး Megan အား mwebb@thda.org မှတစ်ဆင့် အီးမေးလ်ပေးပို့ပါ။

OGEYSIIS

Wakaaladda Horrumarinta Guryaha ee Tennessee (THDA) waxay soo saartay qabyo qoraalka Qorshaha Tallaabada Sanadlaha ee 2018-2019 ee Gobolka Tennessee. Qorshahan si sanadle ah ayaa waxaa loogu diraa Waaxda Guryaha iyo Horrumarinta Magaalooyinka ee Maraykanka oo waxaa lagu sharaxayaa qiyaasta miisaaniyadda iyo hadafyada ama himilooyinka ay ugu talagashay howlaha barnaamijyada horrumarinta guryaha iyo jaaliyadda ee ay qabanayaan CDBG, ESG, HOME, HOPWA iyo HTF. Muwaadiniinta waxaa lagu dhiirigelinayaa in ay akhriyaan oo ay tala ka soo dhiibtaan wixii xog ah ee qorshaha ku jira. Gunaanudka qorsha waxaad ka aqrisan kartaa oo dadka uga faalloon karaan boggan www.thda.org/about-thda/public-notice-and-comment. Isticmaal batoonka boggaas ku qoran ee ah “Select Language” si aad u aragto iyadoo lagu tarjumay luqaddo dhowr ah. Sidoo kale waxaad ka heli kartaa qatka internetka ee Gobolka Tennessee, Waaxda Dhaqaalaha iyo Horrumarinta Jaaliyadda ee TN, Waaxda Caafimaadka ee TN, iyo sagaalka Horrumarinta Degmooyinka ee Tennessee. Faallooyinka oo qoraal ah oo dhanka elegtaroonigga ah lagu soo gudbiyo bogga internetka THDA waxay ogolaan doonaan laga bilaabo 26 Maarso - 25 Abriil, 2018.

Waxaa intaa dheer, Gobolka Tennessee waxay dadwaynaha ka doonayaan in faallo ama tallo ka soo dhiibtaan guryaha sinnaanta oo Falanqeeeyayaasheena Xanibaadyada saaran Dalabyada Guryaha Sinnaanta. Wixii macluumaad dheeri ah iyo rayi ururinta waxaad ka heli kartaa bogga www.thda.org/about-thda/public-notice-and-comment. Faallooyinka oo qoraal ah waxaa lagu soo gudbin karaa dhanka elegtarooniga ee bogga internetka THDA waxaan oggolaan doonaa laga bilaabo 26 Maarso - 5 Abriil, 2018.

Si faallo ama tallo looga helo dadwaynaha waxaa la qaban doonaa kullan dadwayne oo looga hadlayo Qorshaha Tallaabada Sanadlaha ee 2018-19 oo Guryaha Sinnaanta oo Falanqeeeyayaasheena Xanibaadyada saaran Dalabyada Guri Sinnaanta waxaa la qaban doonaa 12 Abriil, 2018 laga bilaabo 11:00 a.m ilaa 1:00 p.m oo waxaa lagu qaban doonaa magaalada Nashville, TN cinwaanka kullanka uu ka dhici doono waa Andrew Jackson Building, 502 Deaderick St., Ground Floor Public Hearing Room (ka soo gal waddada 5th Ave N). Wixii su'aallo ah iyo beddellaad ah, fadlan Megan Webb iimeel ugu dir mwebb@thda.org.

ئاڭدادارى

ئاژانسى گەشەى خانووبەرەى تېنسى (THDA) رەشئوسىكى لە بەرنامەى كىردەمىي سالانەى 2018-2019 بۇ ويلايمەى تېنسى بىلاوكر دوو مەو. ئەم بەرنامە ھەموو سالنىك پىشكەشى وەزارەتى خانووبەرە و گەشەى شارەسازى ئەمىرىكا دىمكرىت تاكوو بودجەى خەملىندراو و ئامانجە دىارىكر او مەكان لە بوارى خانووبەرە و بابەتمەكانى گەشەى كۆمەلەيمەى لە رىگەى بەرنامەكانى

CDBG، ESG، HOME، HOPWA و HTF مەو دىارى بكرىت. شارۆمەندان ھان دەرىن تاكوو زانىارى گونجىندراو لە بەرنامەكەدا تاوتوئ بىكەن و بۆچوونى خۇيان سەبارەت بەو رابگىيەن. كورتەمەك لە بەرنامەكە بەمەبەستى تاوتوئ كىردن و باسكردنى بۆچوون لە ناوئىشانى www.thda.org/about-thda/public-notice-and-comment شىاوى دەستپىراگەشتە. خالى "ھەلبۇزاردنى زمان" بۇ دەستپىراگەشتەن بە وەرگىردراو جۆراو جۆرەكان بەكار بىنە. ھەروەھا لىنكەكانى دەستپىراگەشتەن لە مالىپەرىكانى ويلايمەى تېنسى، وەزارەتى گەشەى ئابورى و كۆمەلەيمەى تېنسى، وەزارەتى تەندرووستى تېنسى و ھەر يەكەك لە نۆ ناوچەكانى گەشەى تېنسى شىاوى دەستپىراگەشتەن دەبىت. بۆچوونە نووسراو نىردراو مەكان لە رىگەى فۆرمى ئىلكترۇنىكىيەو كە لە مالىپەرى THDA دا ھەيە لە رىكەوتى 26ى ئادار تاكوو 25ى نىسانى 2018 وەردەگىرىت.

ھەروەھا، ويلايمەى تېنسى ھەزى لە وەرگرتنى بۆچوونى گەشتىيە لە بوارى خانووبەرەى دادپەروەرەنە و شىكردنەوئى ئىمە لە كۆسپەكانى خالى خانووبەرەى دادپەروەرەنە. زانىارى زىاتر لەم بواردە لە ناوئىشانى www.thda.org/about-thda/public-notice-and-comment دا دەبىت. بۆچوونە نووسراو نىردراو مەكان لە رىگەى فۆرمى ئىلكترۇنىكىيەو كە لە مالىپەرى THDA دا ھەيە لە رىكەوتى 26ى ئادار تاكوو 25ى نىسانى 2018 وەردەگىرىت.

دانىشتنىكى گونگرتنى گەشتى بۇ وەرگرتنى بۆچوونەكانى سەبارەت بە بەرنامەى كىردەمىي سالانەى 2018-2019 و شىكردنەوئى ئىمە لە كۆسپەكانى خالى خانووبەرەى دادپەروەرەنە لە 12ى نىسانى 2018 لە كاترۇمىر 11ى سەرلەبەيانى تاكوو 1ى دوانىوەرۆ بە ناوئىشانى خوارمە لە نەشقىل، تېنسى و لە ناوئىشانى خوارمە بەرپۆ دەچىت: Andrew Jackson Building, 502 Deaderick St., Ground Floor Public Hearing Room (لە 5th Ave N) برۆ ژوورمە). بۇ وەلامدانەوئى پرسىارەكان تەكايە نامە بئىرە بۇ مالىپەرى مېگان بە ناوئىشانى mwebb@thda.org.

ADVISORIO

La Agencia de Desarrollo de Viviendas de Tennessee (THDA) ha completado un borrador del Plan de Acción Anual 2018-2019 para el Estado de Tennessee. Este plan se presenta anualmente al Departamento de Vivienda y Desarrollo Urbano de EE.UU. para detallar el presupuesto aproximado y metas para actividades de vivienda y desarrollo comunitario a través de los programas de CDBG, ESG, HOME, HOWPA, y HTF. Se exhorta a que los ciudadanos revisen y hagan comentarios en cuanto a información contenida en el plan. Un resumen de los planes está disponible para revisar e incluir comentarios públicos en www.thda.org/about-thda/public-notice-and-comment. Use "Select Language" al final de la página para varias traducciones. Vínculos también estarán disponibles en los sitios de web del Estado de Tennessee, Departamento de Desarrollo Económico y Comunitario de Tennessee, Departamento de Salud de Tennessee, y cada uno de los nueve Distritos de Desarrollo de Tennessee. Comentarios por escrito y por vía electrónica en el sitio web de THDA serán aceptados desde el 26 de marzo hasta el 25 de abril de 2018.

Además, el Estado de Tennessee está buscando comentarios públicos sobre equidad en la vivienda y sobre nuestro Análisis de Impedimentos a Opciones de Equidad en la Vivienda. Mayor información y una encuesta estarán disponibles en www.thda.org/about-thda/public-notice-and-comment. Comentarios por escrito y por vía electrónica en el sitio web de THDA serán aceptados desde el 26 de marzo hasta el 25 de abril de 2018.

Se celebrará una audiencia pública para obtener aportes sobre el Plan de Acción Anual 2018-2019 y sobre nuestro Análisis de Impedimentos a Opciones de Equidad en la Vivienda el 12 de abril de 2018, de 11:00 a.m. a 1:00 p.m. en Andrew Jackson Building, 502 Deaderick St., Nashville, TN, Ground Floor Public Hearing Room (entre por la 5th Ave N). Para preguntas y adaptaciones especiales, por favor mande un correo electrónico a Megan Webb a mwebb@thda.org.

THÔNG BÁO

Cơ quan Phát triển Nhà ở Tennessee (THDA, Tennessee Housing Development Agency) đã công bố bản phác thảo Kế hoạch Hành động Hàng năm 2018-2019 cho Tiểu bang Tennessee. Hàng năm, kế hoạch này được nộp cho Bộ Phát triển Đô thị và Nhà ở Hoa Kỳ (U.S. Department of Housing and Urban Development) để đề ra ngân sách ước tính và mục tiêu cho các hoạt động phát triển nhà ở và cộng đồng thông qua các chương trình CDBG, ESG, HOME, HOPWA và HTF. Công dân được khuyến khích xem xét và đưa ra ý kiến về các thông tin có trong bản kế hoạch. Bản tóm tắt kế hoạch có sẵn để xem xét và nhận xét công khai tại www.thda.org/about-thda/public-notice-and-comment. Sử dụng mục "Lựa chọn Ngôn ngữ" ở cuối trang để xem nhiều bản dịch. Các liên kết cũng sẽ được cung cấp trên các trang web của Tiểu bang Tennessee, Bộ Phát triển Kinh tế và Cộng đồng TN (TN Department of Economic and Community Development), Bộ Y tế TN (TN Department of Health) và chín Quận Phát triển của Tennessee. Sẽ chấp nhận các nhận xét bằng văn bản gửi qua điện tử trên trang web của THDA từ ngày 26 tháng 3 đến ngày 25 tháng 4 năm 2018.

Ngoài ra, Tiểu bang Tennessee đang thăm dò nhận xét của công chúng về nhà ở công bằng và Phân tích về Các Trở ngại đối với việc Lựa chọn Nhà ở Công bằng (Analysis of Impediments to Fair Housing Choice). Thông tin bổ sung và cuộc khảo sát sẽ được cung cấp trên www.thda.org/about-thda/public-notice-and-comment. Sẽ chấp nhận các nhận xét bằng văn bản gửi qua điện tử trên trang web của THDA từ ngày 26 tháng 3 đến ngày 25 tháng 4 năm 2018.

Một phiên điều trần công khai để có được thông tin đầu vào về Kế hoạch Hành động Hàng năm 2018-2019 và Phân tích về Các Trở ngại đối với việc Lựa chọn Nhà ở Công bằng sẽ được tổ chức vào ngày 12 tháng 4 năm 2018, từ 11 giờ sáng đến 1 giờ chiều tại Nashville, TN tại Tòa nhà Andrew Jackson, 502 Deaderick St., Ground Floor Public Hearing Room (đi vào từ 5th Ave N). Nếu có thắc mắc hoặc cần điều chỉnh hợp lý nào, vui lòng gửi email cho Megan Webb tại địa chỉ mwebb@thda.org.

Estado de Tennessee

Plan de Acción Anual para 2018-19

Resumen Ejecutivo

El Plan de Acción Anual hace las funciones de la solicitud anual del estado de Tennessee al Departamento de Vivienda y Desarrollo Urbano de los EE.UU. (HUD) para la financiación de cinco programas de subvenciones de fórmula del HUD: el Bloque de Subvenciones para Desarrollo Comunitario (CDBG), el Programa de Asociación en Inversiones HOME (HOME), el Programa de Subvenciones de Soluciones de Emergencia (ESG), el Fondo de Subvenciones para la Vivienda (HTF) y el Programa de Oportunidades de Vivienda para Personas con SIDA (HOPWA). El Plan de Acción Anual para 2018-19, describe las acciones que se tomarán en nombre del Estado de Tennessee para administrar y ejecutar los programas de subvenciones del Plan Consolidado durante el Año del Programa a partir del 1 de julio de 2018, hasta el 30 de junio de 2019.

Los nombres de los programas de subvenciones, las agencias estatales que los administran, y las asignaciones del Año del Programa 2017-18 se enumeran a continuación. Se espera recibir asignaciones similares para el Año del Programa 2018-19.

- Programa de Bloque de Subvenciones para Desarrollo Comunitario (CDBG) administrado por el Departamento de Desarrollo Económico y Comunitario de Tennessee (ECD, por sus siglas en inglés), asignación: \$24,977,133
- Programa de Asociación en Inversiones HOME (HOME) administrado por la Agencia de Desarrollo de la Vivienda de Tennessee (THDA, por sus siglas en inglés), asignación: \$9,582,153
- Programa del Fondo Nacional de Subvenciones para la Vivienda (HTF), administrado por THDA, asignación: \$3,160,279
- Programa de Subvenciones de Soluciones de Emergencia (ESG), administrado por THDA, asignación: \$3,640,860
- Programa de Oportunidades de Vivienda para Personas con SIDA (HOPWA), administrado por el Departamento de Salud de Tennessee (DOH, por sus siglas en inglés), asignación: \$1,097,514

El Plan de Acción Anual describe las cantidades y el origen de los fondos de las cinco subvenciones de fórmula que se espera tener disponible durante el Año del Programa 2018-19 y aborda los métodos mediante los cuales los fondos serán distribuidos por las agencias administrativas a los solicitantes elegibles. Los fondos están disponibles ya sea a través de un proceso competitivo de subvenciones, sobre la base de una fórmula o, en algunos casos, ambos. También se examinan otros recursos federales y no federales administrados por el THDA y estos son: el Programa de Vales para Elección de Viviendas de Sección 8, Administración de Contrato de Sección 8, el Programa de Crédito Tributario para Viviendas de Bajos Ingresos (LIHTC, por sus siglas en inglés), el Fondo de Subvenciones para la Vivienda de Tennessee, el Programa de Crédito Tributario para Inversiones en la Comunidad (CITC, por sus siglas en inglés), y los Programas de Propietarios de Viviendas.

Si los fondos de las subvenciones para HOME, ESG, HTF, y HOPWA difieren de las asignaciones esperadas, los presupuestos para las actividades propuestas afectadas por el cambio se incrementarán o disminuirán respectivamente para que se correspondan con las sumas asignadas. El CDBG expresa sus asignaciones en base al rango de porcentaje de la financiación global: Rehabilitación de Vivienda (3-5%), Habitabilidad de la Comunidad (15-20%), y la Infraestructura para el Agua y Alcantarillado (75-80%). Para cualquier cambio imprevisto aparte de lo antes descrito, se seguirá el plan de participación ciudadana del estado para cualquier revisión necesaria.

Metas y objetivos

También figuran en el Plan de Acción Anual para 2018-19 los objetivos específicos que las agencias administrativas, conocidas colectivamente como Asociados de Planificación Consolidada, esperan abordar en el próximo año, en lo que respecta al Plan Consolidado de cinco años, y los indicadores de los resultados de los objetivos mediante los cuales las agencias administrativas medirán el rendimiento. Los objetivos específicos del Plan Consolidado de 2015-19 son:

1. Crear y mantener existencias de vivienda de alquiler y de propiedad asequible con la construcción de nuevas viviendas asequibles, rehabilitar viviendas asequibles existentes, proporcionar asistencia para el depósito inicial, y proporcionar ayuda para el alquiler basada en el inquilino a las poblaciones elegibles.
2. Apoyar los centros para personas sin hogar para garantizar que se pueda continuar satisfaciendo las necesidades de la población sin hogar de Tennessee y proporcionar recursos para apoyar a las personas que se encuentran sin hogar o que corren el riesgo de quedarse sin hogar.
3. Proporcionar recursos para conservar las opciones de vivienda asequible para las personas con VIH/SIDA.
4. Proporcionar recursos a las ciudades y las comunidades para modernizar y reparar los sistemas de agua y alcantarillado. Crear también una base de infraestructura que proporcione una alta calidad de vida a las personas, capacidad productiva para las comunidades, y apoye el desarrollo económico.
5. Brindar a las comunidades recursos para revitalizar la infraestructura pública y comunitaria y activos para mejorar la habitabilidad de las comunidades.
6. Proporcionar recursos a las ciudades y comunidades para apoyar la creación de puestos de trabajo, capacitación laboral y otras oportunidades laborales.
7. Ofrecer programas de desarrollo comunitario, de manera que proporcionen la máxima asistencia no sólo a las personas económicamente desfavorecidas, sino también a las áreas del estado económicamente desfavorecidas o de bajos o moderados ingresos.
8. Fomentar afirmativamente viviendas asequibles proporcionando capacitación y asistencia técnica a las comunidades, organizaciones, agentes de bienes raíces, prestamistas y otros interesados. También proporcionar asesoría de vivienda asequible, divulgación y educación a las familias, las organizaciones, los agentes de bienes raíces, prestamistas y otros interesados.

Para cada una de las ocho metas, se elaboraron pasos de acción en el Plan Consolidado de cinco años, concebidos para hacer frente a estas metas. También se analizan los pasos de acción y la forma en que cada uno de los programas se propone abordar las metas. Los Asociados de Planificación Consolidada han redactado documentos de planificación, incluidos en el anexo del Plan de Acción Anual, para vincular mejor los objetivos de subvención del HUD con los objetivos, los pasos de acción, las actividades y las medidas de rendimiento del Estado de Tennessee.



DISCRIMINATION COMPLAINT FORM INSTRUCTIONS

Title VI of the Civil Rights Act of 1964 (42 United States Code § 2000d) and Tennessee Code Annotated § 4-21-904 provide that any entity receiving Federal financial assistance may not discriminate against their program applicants, beneficiaries or participants based on their race, color or national origin. Further, the Tennessee Human Rights Act (Tenn. Code Ann. §§ 4-21-601) provides for fair housing based on race, color, creed, religion, sex, handicap, familial status or national origin.

THDA does not discriminate against any person based on race, color, national origin, gender, religion, disability, age, creed, familial status, or on any other basis legally prohibited by or protected by Federal or State law.

If you feel that you have been discriminated against because of your race, color, national origin, sex/gender, disability, religion/creed, age (40 or over) or familial status* (presence of children or pregnancy) when applying to or participating in a Federally funded program/ activity or when seeking to purchase, finance, or rent a home, then you may file a complaint with THDA. All complaints, written or verbal, will be accepted; however, your completion of this form may assist THDA with investigating the complaint to the fullest extent.

THDA works with the jurisdictional agency, the Tennessee Human Rights Commission (THRC), to manage complaints alleging discrimination. THDA also may refer complaints or work with the Department of Housing and Urban Development (HUD) when investigating complaints of housing discrimination.

Complaints of discrimination must be filed with THDA or the THRC within 180 days of the alleged discriminatory act. HUD will accept complaints involving housing discrimination within 365 days of the alleged discriminatory act.

THDA will notify you of the receipt and status of your complaint within ten (10) days of receiving the complaint. Where appropriate, a complaint investigation will be completed. A written response to your complaint will be sent to you within no more than ninety (90) days.

If you require a reasonable accommodation to complete this form or participate in the complaint process, please contact Laura Swanson, Civil Rights Compliance at (615) 815-2127 or lswanson@thda.org.

*Familial status includes people in the process of adopting or gaining custody of a child under age 18.

Please Provide the Following Information to assist with THDA's review of your complaint.

1. During what activity did the alleged discriminatory acts occur (check all that apply)?
 - ☐ Applying for assistance in a federal program (please state the program name if known):

 - ☐ Participation in a federal program (please state the program name if known):

 - ☐ When renting a housing unit
 - ☐ When applying for a loan
 - ☐ When purchasing a home
 - ☐ Other circumstance (explain briefly): _____
2. Person filing the complaint (Complainant) and contact information:
Name: _____
Address: _____
City, State, and Zip Code: _____
Telephone Number with Area Code: _____
Email: _____
3. Person discriminated against (if someone other than the person filing the complaint):
Name: _____
Address: _____
City, State, and Zip Code: _____
Telephone Number with Area Code: _____
Email: _____
4. What is the name and contact information of the person, agency, institution or property (Respondent) that discriminated against you:
Name: _____
Address: _____
City, State, and Zip Code: _____
Telephone Number with Area Code: _____
5. Which best describes the reason you believe the discrimination took place? Your:
 - ☐ Race/Color
 - ☐ National Origin (includes language discrimination)
 - ☐ Religion or creed
 - ☐ Age
 - ☐ Familial status (presence of children or pregnancy)
 - ☐ Sex/gender
 - ☐ Disability
 - ☐ Other: _____

6. When did the alleged discrimination take place?

Starting date: _____

Ending date or most recent date of alleged discriminatory act: _____

7. In your own words, describe the alleged discrimination. Explain what happened and whom you believe is responsible. Include as many details and dates as possible (attach additional pages if needed). _____

8. Are there any witnesses to the discriminatory acts that you believe we should interview?

☐ Yes ☐ No

If YES, please list the name and phone number of each potential witness: _____

9. Have you filed this complaint with anyone else at THDA? ☐ Yes ☐ No

If YES, on what date did you previously file a complaint? _____

If YES: Name of the THDA staff member to whom you spoke with or sent the complaint previously? _____

If YES, how did you file the complaint? ☐ Written & Mailed ☐ E-mailed ☐ Phone

10. Have you filed this complaint with any other federal, state or local agency? ☐ Yes ☐ No

If YES, provide information about the agency where the complaint was filed:

Agency Name (e.g. HUD or TN Human Rights Commission) or Court System (e.g. Davidson County Chancery Court): _____

Address: _____

City, State, and Zip Code: _____

Telephone Number with Area Code: _____

Please attach additional and supporting documentation with this form and submit to:

Laura Swanson, Title VI Coordinator, lswanson@thda.org

Tennessee Housing Development Agency

502 Deaderick Street, Third Floor

Nashville, TN 37243

Signature of Complainant: _____

Printed Name of Complainant: _____

Date Submitted: _____



Civil Rights & Housing Activities

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964; TITLE VIII
OF THE CIVIL RIGHTS ACT OF 1968 (FAIR HOUSING);
RELATED NON-DISCRIMINATION ACTS & GUIDANCE

Purpose of Non-Discrimination Laws

HUD estimates that more than 2 million instances of housing discrimination occur each year, but less than 1% are reported.

Non-discrimination laws protect certain classes of people who have historically faced discrimination:

- In programs and activities receiving Federal financial assistance (Title VI of the Civil Rights Act of 1964);
- In the sale, rental, advertising and financing of dwellings and in other housing-related activities (Title VIII of the Civil Rights Act of 1968, “Fair Housing Act”).

What/Who is Covered by Non-Discrimination Laws?

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.

- *Age Discrimination Act of 1975* prohibits discrimination under any program or activity receiving Federal financial assistance on the basis of age.

What/Who is Covered by Non-Discrimination Laws?

Title VIII of the Civil Rights Act of 1968 (“Fair Housing Act”) prohibits discrimination in the sale, rental or financing of housing because of race, color, religion or national origin.

- Amendments to Title VIII added sex as a protected class in 1974
- Amendments added disability and familial status (presence of children under the age of 18 or pregnancy) as protected classes in 1988

Tennessee Human Rights Act (Tenn. Code Ann. §§ 4-21-601)- provides for fair housing based on race, color, creed, religion, sex, handicap, familial status or national origin.
Creed is a set of religious beliefs.

Protected Classes

Protected classes are a group of people with a common characteristic who are legally protected from discrimination on the basis of that characteristic.

In programs or activities that receive **federal financial assistance** the following are protected classes under Title VI:

Race, Color & National Origin

In **housing activities**, the following are protected classes under Title VIII & Tennessee state law:

Race, Color & National Origin

AND

Religion/Creed • Sex • Disability • Familial Status

THDA Non-Discrimination Policy

“No staff person or partner of THDA shall engage in discriminatory practices...” and the intent of the policy is to provide guidance to THDA staff in preventing discrimination on the basis of race, color, religion, national origin, sex, familial status, disability and “any other class protected under state or federal law in providing services to the public.”



DISABILITY



RACE



SEX



COLOR



NATIONAL
ORIGIN



RELIGION



FAMILY
STATUS

Purpose of Non-Discrimination Training

The **Civil Rights Restoration Act of 1987** requires recipients of federal funds, along with sub-recipients and contractors, to comply with civil rights laws in all areas of operation, not just in the particular program or activity that received federal funding.

Training helps ensure that **all THDA employees (& sub-recipients of THDA's federal funds)** are:

1. Aware of and understand the provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), subsequent federal and state non-discrimination regulations & guidance;
2. The minimum requirements to be in compliance with them.

Discriminatory Practices under Title VI

- Denying a person any program services, financial aid or benefits;
- Providing a different service, financial aid or benefit or providing them in a different manner than they are provided to others;
- Segregating or treating an individual separately in any matter related to receiving a service, aid or benefit.



Discriminatory Practices under Fair Housing

In the Sale and Rental of Housing, no one may take any of the following actions based on race, color, national origin, religion/creed, sex, familial status or disability:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting) or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

Discriminatory Practices under Fair Housing

In Mortgage Lending: No one may take any of the following actions based on race, color, national origin, religion/creed, sex, familial status or disability:

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan or
- Set different terms or conditions for purchasing a loan.



Discriminatory Practices under Fair Housing

It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or disability. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.



Disparate Treatment vs. Disparate Impact

Title VI & Title VIII (Fair Housing Act) both prohibit:

- ❖ **Disparate Treatment (Intentional Discrimination):** Actions that result in circumstances where similarly situated persons are treated different because of their race, color, or national origin.
- ❖ **Disparate Impact (Unintentional Discrimination):** The recipient's procedure or practice while neutral on its face has the effect of disproportionately excluding or adversely affecting members of the projected class without substantial legitimate justification.
 - ❖ A procedure or practice may discriminate against a given group even if the agency had **no intention** of doing so.

Sex & Gender Identity

Equal Access in Accordance with an Individual's Gender Identity (HUD 24 CFR 5 81 FR 64763) -ensures equal access for individuals in accordance with their gender identity in:

- Programs funded by HUD's Office of Community Planning and Development (CPD);
 - Housing assisted by HUD;
 - Housing insured by the Federal Housing Administration (FHA) (includes FHA lending).
- Housing must be made available without regard to actual or perceived sexual orientation or gender identity.
- Discrimination against a lesbian, gay, bisexual, or transgender (LGBT) person may be covered if it is based on non-conformity with gender stereotypes. For example, if a housing provider refuses to rent to an LGBT person because he believes the person acts in a manner that does not conform to his notion of how a person of a particular sex should act.
- Recent federal court decisions extend the protection of “sex” to include sexual orientation and gender identity.



Limited English Proficiency

Definition: *Individuals who do not speak English as their primary language; and/or have a limited ability to read, speak, write, or understand English.*

Executive Order 13166 - Persons with **Limited English proficiency (LEP)** must be afforded a meaningful opportunity to participate in programs that receive federal funds.

To ensure equal access: LEP persons must be notified of the availability of free **oral interpreting services**, and the services must not require friends or family to provide interpretation.

- ✓ THDA has contracted with AVAZA Language Services Corporation for oral interpretation.
- ✓ 120 languages and dialects supported
- ✓ Phone numbers: (615) 534-3400; (800) 482-8292
- ✓ Instructions for using AVAZA & working with LEP persons is located on the THDA Intranet under "Instructions/Tips."



Limited English Proficiency

- ✓ Language Identification Guides are available in all THDA offices (with persons who often speak with beneficiaries and members of the public).
- ✓ The THDA website may be translated into more than 100 languages using Google translate.

To ensure equal access: **“Vital” written documents** must be translated for LEP language groups that comprise a certain percent/number of the population served. Even where documents are not translated routinely, written notice should be provided in the primary language of the LEP person of the right to receive competent oral interpretation of vital written materials, free of cost.

- ✓ HUD publishes many vital documents for federal housing programs in multiple languages: <https://www.hud.gov/offices/fheo/lep.xml#FHEO>



Fair Housing & Criminal History

As many as 100 million U.S. adults – or nearly one-third of the population – have a criminal record of some sort.

- HUD issued guidance in April 2016 addressing how the Fair Housing Act applies to the use of criminal history by providers or operators of housing and real-estate related transactions.
- The Fair Housing Act prohibits both intentional housing discrimination & housing policies that have an unjustified discriminatory effect based on protected characteristics.
- HUD guidance provides national statistics that show that racial and ethnic minorities face disproportionately high rates of arrest and incarceration.

To avoid creating a policy or practice that could be determined to have a discriminatory effect, housing providers should develop policy to deny housing only when criminal conduct/history presents a demonstrable risk to **resident safety and/or property.**



Fair Housing & Criminal History

HUD guidance does not prohibit providers from considering criminal history when making housing decisions, but advises providers to avoid arbitrary and overbroad criminal history-related bans.

HUD recommends using a **three-step burden shifting** standard when evaluating whether a criminal history based policy or practice restricting housing access is appropriate.

1. Prior arrest(s) (without a conviction) does not satisfy the burden of showing a substantial, legitimate, nondiscriminatory interest (i.e. demonstrable risk to resident safety or property). **An arrest is not proof that criminal conduct occurred;** thus, arrests without conviction are not sufficient grounds for excluding a person from housing.



Fair Housing & Criminal History

2. For denials or exclusions based on prior convictions, the provider must be able to prove that a criminal history denial practice is necessary to achieve a substantial, legitimate, nondiscriminatory interest (i.e. protect resident safety and/or property).
 - A blanket prohibition on any person with any conviction record – no matter when the conviction occurred, what the underlying conduct entailed, or what the convicted person has done since then – will be unable to meet this burden.
 - The HUD guidance states a housing provider must take into account the nature, severity, and age of a conviction.
3. Evaluating Whether There Is a Less Discriminatory Alternative (to denial of housing)
 - Housing providers should consider a person's suitability for housing based upon all factors in the application and not just criminal history.
 - Ideally, housing providers should delay consideration of criminal history until after an individual's financial and other qualifications are verified.



Non-Discrimination & Disability

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability by recipients of Federal financial assistance.

The Americans with Disabilities Act of 1990 (“ADA”) prohibits discrimination on the basis of disability by both public and private entities, whether or not they receive Federal financial assistance.

Section 504 and the ADA define the terms "handicap" or "disability" to mean a physical or mental impairment that substantially limits one or more of the major life activities an individual. Included are people who have a record of such an impairment, or are regarded as having such an impairment.

The purpose of these laws is to ensure that covered programs are as accessible to persons with disabilities as they are to non-disabled individuals.



Fair Housing & Disability

The **Fair Housing Act** defines disability as a physical or mental disability that substantially limits one or more major life activities; a record of such a disability or are regarded as having such a disability.

The Act requires landlords and others to allow a disabled person to make reasonable modifications to a dwelling unit or common use areas, at their expense, if necessary for the disabled person to use the housing. (Where reasonable, the landlord may permit changes only if the person agrees to restore the property to its original condition when s/he moves.)

Reasonable modification examples:

- *Addition of a ramp for wheelchair access into a unit.*
- *Addition of grab bars or other handicap accessible features in a bath or kitchen.*
- *Hearing impaired smoke detector.*



Fair Housing & Disability

The **Fair Housing Act** requires housing providers to make reasonable accommodations in rules, policies, practices or services if necessary for a disabled person to enjoy and/or fully use services offered to other residents and/or the individual dwelling unit.

- A housing provider/landlord may not ask a housing applicant about the existence, nature, and extent of his or her disability, but may request verification of the disability (unless the disability is obvious) and the need for the specific accommodation from a reliable third party who can verify the disability.
- An accommodation may involve a cost to the housing provider, so long as the accommodation does not pose an undue financial and administrative burden and the requested accommodation does not constitute a fundamental alteration of the provider's operations.

Reasonable Accommodation Examples:

- *Initially occupy or move to a first floor unit when available*
- *Paying rent on a day that corresponds with a disability check*
- *In rental assistance programs, an allowance for an extra bedroom for a caregiver or equipment.*
- *Service, therapy or emotional support animal*



Service & Support Animals

A **service animal** is individually trained to do work/ perform tasks for an individual with a disability (physical, mental or intellectual disability).

- Only dogs and miniature horses (24-36 inches) qualify as service animals.
- States may offer licensure or certification for service animals, but the ADA does not require a license or special certification for an animal to qualify as a service animal.

An **emotional support, comfort or therapy animal** provides companionship, relieves loneliness, and may help with depression, anxiety, and certain phobias, but does not have special training or certification to assist people with disabilities.

- Any type of animal may qualify as a support animal, not just dogs.
- A housing provider may ask for documentation of the presence of a disabling condition (if not obvious) and need for specific accommodation requested (see prior slide).



Service & Support Animals

The **ADA** allows individuals with a disability to bring a **service animal** (but not a support animal) into public facilities & accommodations.

The **Fair Housing Act** may allow for either a **service or a support animal** as a reasonable accommodation for an individual with a disability.

Both **service & support** animals:

- Are not pets--no fee or pet deposit may be charged by the business or property.
- Must be “under the control” of the handler.
- The handler is also responsible for their care and clean up (not the property or business owner).
- Handler may be responsible to pay damages if a service or support animal damages property (including housing).



Fair Housing & Design Requirements

The **Fair Housing Amendments Act of 1988** requires newly constructed multi-family dwellings with four or more units to provide basic accessibility to people with disabilities, if the building was ready for first occupancy on or after March 13, 1991. The design requirements apply to:

- All units in buildings with elevators;
- Ground floor units in buildings without elevators.
- Multi-story townhouses are exempt from these requirements

The Fair Housing Amendment Act's accessibility requirements are not as strict as Section 504, BUT- the Fair Housing Amendment Act's accessibility requirements apply to a broader number of dwelling units.

Where both the Fair Housing Amendment Act and Section 504 apply to a particular housing facility, the facility must be in compliance with both laws.




Fair Housing & Design Requirements

The **Fair Housing Act** requires that “covered multifamily dwelling units” be designed and constructed in such a manner that:

- ✓ The public and common use areas are readily accessible to and usable by handicapped persons;
- ✓ All the doors designed to allow passage into and within all premises are sufficiently wide to allow passage by handicapped persons in wheelchairs;
- ✓ All premises within covered multi-family dwelling units contain the following features of adaptable design:
 - An accessible route into and through the covered dwelling unit;
 - Light switches, electrical outlets, thermostats, and other environmental controls are in accessible locations;
 - Reinforcements in bathroom walls will allow later installation of grab bars around the toilet, tub, shower, stall and shower seat, where such facilities are provided usable kitchens and bathrooms such that an individual in a wheelchair can maneuver about the space.

To Comply with Title VI & Fair Housing

- ✓ Do not engage in discriminatory actions against protected classes.
- ✓ Appoint a Title VI Coordinator 
- ✓ Provide Title VI & Fair Housing Training for new employees & periodic training for all employees.
- ✓ Develop a Title VI Policy Statement and post in visible areas
 - ✓ *Posted to THDA Intranet*
- ✓ Develop a written Title VI Complaint Process & Form
 - ✓ *Posted to THDA Internet*
- ✓ Acquire signed Title VI Assurances from sub-recipients
 - ✓ *This should be part of the monitoring process for THDA sub-recipients.*
- ✓ Include Title VI Assurances in all contracts
 - ✓ *THDA OPS ensures contracts have required language.*

To Comply with Title VI & Fair Housing

- ✓ Monitor sub-recipients for compliance with Title VI & Fair Housing.
- ✓ Monitor & report on (Title VI Plan) race, ethnicity and gender of contractors and subcontractors
 - ✓ Promote participation in contracting by disadvantaged business enterprises (DBEs), such as small, women and minority owned businesses by conducting outreach and advertising in local media and minority publications.
- ✓ Monitor & report on (Title VI Plan) race, ethnicity and gender of agency Boards & encourage participation by persons in protected classes.
 - ✓ The inclusion of minorities on planning boards and commissions is critical in establishing an equal access planning system.

To Comply with Title VI & Fair Housing

- ✓ Disseminate Title VI & Fair Housing information to the public.
 - ✓ THDA maintains Title VI & Fair Housing information on the THDA website.
 - ✓ THDA maintains a Title VI explanation & complaint form on the website.
 - ✓ Section 8 Rental Assistance distributes Fair Housing & discrimination complaint information to all program beneficiaries & information is available on the THDA website.
- ✓ Evaluate Title VI & Fair Housing activities annually & submit a Title VI Plan to the Tennessee Human Rights Commission annually to report on programs and activities



Examples of Discriminatory Acts

Persons with an identifiable accent do not have their calls about apartments returned. The landlord is returning the calls of others who don't have an identifiable accent.

- *This violates Title VI & the Fair Housing Act's prohibition on discrimination based upon national origin. It is illegal to discriminate because of a person's birthplace, ancestry, culture or language.*

An underwriter for an FHA-insured lender is reviewing a loan application by two males; both incomes are being used as the basis for the applicants' credit worthiness. The underwriter assumes the applicants are a same sex couple and, as a result, denies the application despite the fact that the applicants meet all requirements for the loan.

- *This violates HUD's Equal Access Rule, which prohibits FHA-insured lenders from taking actual or perceived sexual orientation into consideration in determining adequacy of an applicant's income.*



Examples of Discriminatory Acts

An applicant for rental housing has a child who uses a wheelchair. The bathroom door in the dwelling unit is too narrow for the wheelchair to pass. The applicant asks the landlord for permission to widen the doorway at the applicant's own expense, and the landlord refuses.

- *This violates the Fair Housing Act's reasonable modification rule. It is unlawful for any person to refuse to permit, at the expense of the disabled person, reasonable modifications of existing premises occupied or intended to be occupied by such person if the modifications are necessary to allow the disabled person full enjoyment of the unit. In addition, the landlord may not always condition permission on the renter paying for the modification. The landlord may be responsible if the unit is in an apartment complex with 4 or more units and was built for first occupancy after March 13, 1991, and does not meet all of the accessibility requirements under the Fair Housing Act or if the complex is federally funded (e.g. Section 8 project based or public housing).*

A property manager prohibits children from riding bikes in certain areas of the property but not others.

- *This violates the prohibition on discrimination based upon familial status. Children should not be treated differently than others or singled out. However, the property could limit all residents from riding bikes in a certain area of the property.*

Responsible Agency & Complaints

THDA has a **Discrimination Complaint form** and explanation posted on the website. THDA works with the Tennessee Human Rights Commission (THRC) and HUD to ensure appropriate resolution to all discrimination complaints.

- HUD is the federal agency responsible for enforcing the Fair Housing Act.
 - The federal statute of limitations for filing a complaint is 365 days.
- The THRC investigates complaints of discrimination under the Tennessee Human Rights Act.
 - The statute of limitations for filing a complaint with the THRC is 180 days.
 - If the complaint is beyond the 180 days but within 365 days, the THRC will handle intake and forward the complaint to the appropriate HUD office for investigation.
- The statute of limitations for a private individual to file a Fair Housing Act case in federal court is two years.

Laura Swanson, THDA Civil Rights & Strategic Planning Advisor

lswanson@thda.org • 615-815-2127

<https://thda.org/about-thda/fair-housing>

Tennessee Human Rights Commission

<https://www.tn.gov/humanrights/>

&

Tennessee Fair Housing Council

<http://www.tennfairhousing.org>

Questions.....

THDA Non-Discrimination Quiz

1. Title VI of the Civil Rights Act of 1964 prohibits discrimination in programs and activities that receive Federal financial assistance on the basis of:
 - ☐ Age, race and national origin
 - ☐ Race, color and national origin
 - ☐ Sex, age and race
2. In addition to discrimination, Title VI also prohibits:
 - ☐ Harassment
 - ☐ Institutional codes of conduct
 - ☐ Employment and work related opportunities
3. Other federal non-discrimination laws prohibit discrimination on the basis of:
 - ☐ Sex, age, political ideology
 - ☐ Handicap/disability,
 - ☐ Age, sex & handicap/disability
4. According to Title VI, agencies operating programs with Federal financial assistance:
 - ☐ Can choose to provide different services and benefits to different groups of people.
 - ☐ Can deny services, aids or benefits.
 - ☐ Can provide services, aids and benefits in different ways for certain people.
 - ☐ None of the above.
5. Sub-recipients/contractors of agencies who receive Federal financial assistance are required to have a Title VI Coordinator & follow Title VI requirements in a similar fashion to the primary recipient (THDA)?
 - ☐ True
 - ☐ False
6. Who is a Limited English Proficient (LEP) Person?
 - ☐ A person who does not speak English as their primary language and has the limited ability to speak, write or understand English.
 - ☐ A person from the United States that cannot read.
 - ☐ A person who does not speak English at all.
 - ☐ Answers A and C
7. When an LEP person contacts THDA with questions or a request for services, which of the following procedures should be followed?
 - ☐ Access the AVAZA language line.
 - ☐ Use a language identification guide to determine translation needs.
 - ☐ Provide vital written documents in chosen language.
 - ☐ All of the above.
8. The purpose of Title VIII of the Civil Rights Act of 1968 (Federal Fair Housing Act) is to ensure that everyone has equal access to housing regardless of their race, color, national origin, religion, sex, disability, familial status.
 - ☐ True
 - ☐ False

9. Based on federal fair housing law, which of the following people would be protected:
- ☐ A divorced female, single parent
 - ☐ A 35-year-old single, Jewish man
 - ☐ A 50-year-old white man
 - ☐ All of the above
10. In addition to federal non-discrimination laws, Tennessee also has a state law prohibiting discrimination in housing activities?
- ☐ True
 - ☐ False
11. What rental practices are banned in the rental of housing if based on race, color, national origin, religion, sex, disability, and familial status?
- ☐ Refusing to rent or negotiate for housing.
 - ☐ Setting different terms, conditions, or privileges for the rental of housing, such as different lease provisions related to rental charges, security deposits, and other lease terms.
 - ☐ Threatening, coercing, intimidating, or interfering with anyone exercising a fair housing right or assisting others who exercise that right.
 - ☐ All of the above.
12. When developing policies to protect residents and property from potential criminal acts, a housing provider may deny access for which of the following and not be in danger of creating a policy that creates an unjustified discriminatory effect based on protected characteristics?
- ☐ One or more arrests for felony crimes in the past three years.
 - ☐ Any criminal conviction regardless of what type or when the conviction occurred.
 - ☐ A felony criminal conviction that occurred in the past three years.
 - ☐ All of the above.
 - ☐ None of the above.
13. If a housing community has a strictly enforced "No Pet" policy, it would be considered a reasonable accommodation to allow a person with a mental illness, such as Post Traumatic Stress Disorder, an emotional support animal.
- ☐ True
 - ☐ False
14. Anyone protected by Title VI that feels they have been discriminated against has how many days to file a complaint to be investigated by the state Human Rights Commission?
- ☐ 60
 - ☐ 90
 - ☐ 180
15. Title VI decisions may be appealed.
- ☐ True
 - ☐ False



Title VI/Fair Housing Update Training

LIMITED ENGLISH PROFICIENCY & LANGUAGE
ASSISTANCE RESOURCES

Limited English Proficiency

Who are Limited English Proficiency Persons?

Persons, who as a result of national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand English.

Title VI of the Civil Rights Act of 1964 prohibits discrimination based national origin. Recipients of Federal funds, including but not limited to state agencies, must comply with the Title VI requirements.



Four Factor Analysis

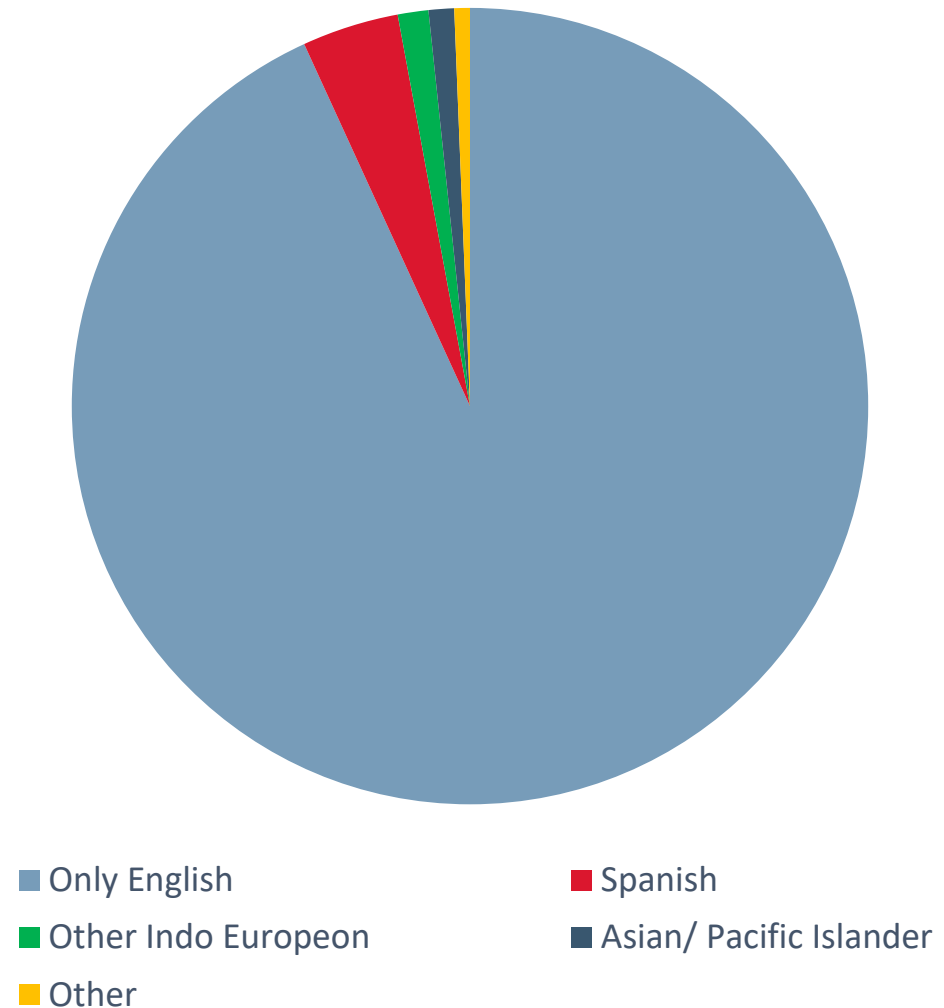
Federally assisted recipients are required under **Executive Order 13166** to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the recipient's programs and activities. EO 13166 requires a Four-Factor analysis, including:

Factor 1: The number or proportion of LEP persons served or encountered in the eligible service population (including those who would be served if the person received outreach and language services).

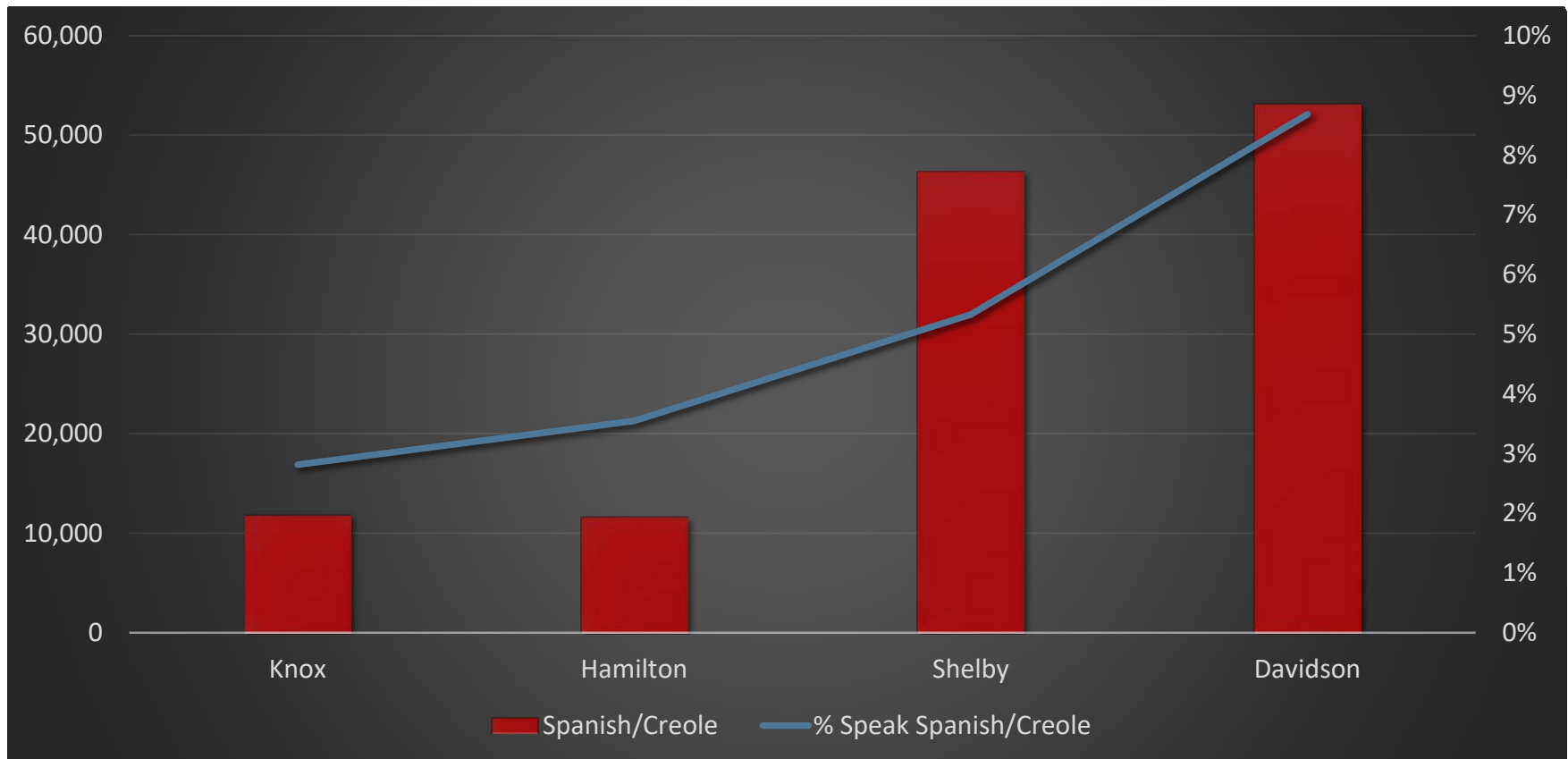
Four Factor Analysis

- More than 90% of Tennesseans speak English.
- The second most common language group is Spanish - almost 4% of Tennesseans speak Spanish.
- Among Tennesseans who speak Spanish, 45% speak English less than very well.

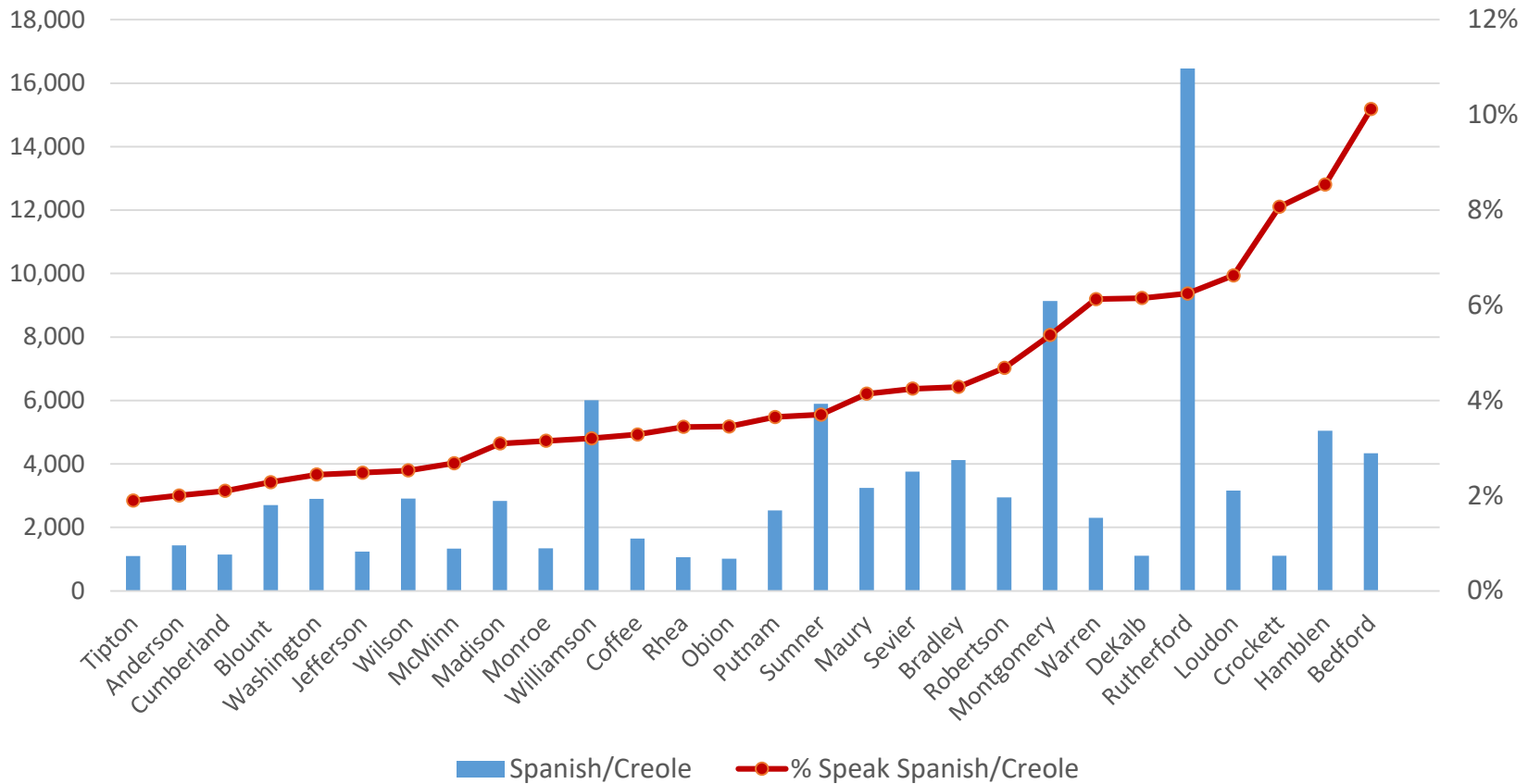
% Population by Language Group, State



Spanish/ Sp. Creole- Metro Areas



Spanish/ Sp. Creole by non-Metro County



Four Factor Analysis

**Factor 2: The frequency with which the LEP persons
come into contact with the program.**

Over the past 3 years, the most common language for oral interpretation requests within THDA programs is **Spanish**.

Requests were also received for: **Arabic, Farsi, Kurdish, & Spanish Creole.**

Four Factor Analysis

The third and fourth factors involve the activities conducted by the agency & resources:

- Factor 3:** The nature and importance of the program, activity, or service provided by the program.
- Factor 4:** The resources available and costs to the recipient/agency.

Four Factor Analysis

Once the Four-Factor Analysis has been completed, a **Language Access Plan (LAP)** is developed to define how THDA will provide appropriate language assistance through:

- Oral Translation
- Written Translation of Vital Documents

Language Assistance- Interpretation

THDA has contracted with AVAZA Language Services Corporation for oral interpretation free of cost.

✓120 languages and dialects supported

Phone numbers: (615) 534-3400; (800) 482-8292

✓Instructions for using AVAZA & working with LEP persons is located on the THDA Intranet under “Instructions/Tips.”

“I Speak” Cards are available by calling Laura Swanson.

Language Assistance- Translation

“Vital” written documents must be translated for LEP language groups that meet HUD’s safe harbor thresholds (1,000 persons or 5% of eligible population).

We are exploring translating vital documents into Spanish.

- ✓ HUD publishes many vital documents for federal housing programs in multiple languages: <https://www.hud.gov/offices/fheo/lep.xml#FHEO>

Even where documents are not translated routinely, written notice should be provided in the primary language of the LEP person of the right to receive competent oral interpretation of vital written materials, free of cost.

Language Assistance Plan

COMING SOON

THDA will release a new Language Assistance Plan &
New Guidance on Language Assistance Measures.

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

ASSURANCE OF COMPLIANCE

WITH DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

REGULATIONS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

_____ (hereinafter called the
(Name)

"Applicant") HEREBY AGREES THAT it will comply with Title VI of the Civil Rights Act of 1964 (P.L. 88-352 and all requirements imposed by or pursuant to the Regulations of the Department of Housing and Urban Development (24 CFR, Subtitle A, Part 1) issued pursuant to that Title, to the end that, in accordance with Title VI of the Act and the Regulations, 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 otherwise subjected to discrimination under any program or activity for which the Applicant receives Federal financial assistance from the Department of Housing and Urban Development, and HEREBY GIVES ASSURANCE THAT it will immediately take any measures necessary to effectuate this agreement.

If any real property or structure thereon is provided or improved with the aid of Federal financial assistance extended to the Applicant by the Department of Housing and Urban Development, this assurance shall obligate the Applicant, or in the case of any transfer of such property, any transferee, for the period during which the real property or structure is used for a purpose for which the Federal financial assistance is extended or for another purpose involving the provision or similar services or benefits. If any personal property is so provided, this assurance shall obligate the Applicant for the period during which it retains ownership or possession of the property. In all other cases, this assurance shall obligate the Applicant for the period during which the Federal financial assistance is extended to it by the Department of Housing and Urban Development.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal loans, advances, grants, properties, contracts or other Federal financial assistance extended after the date hereof to the Applicant by the Department of Housing and Urban Development, including installment payments after such date on account of applications for Federal financial assistance which were approved before such date. The Applicant recognizes and agrees that such Federal financial assistance will be extended in reliance on the representations and agreements made in this assurance, and that the United States shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the Applicant, its successors, transferees, and assignees, and the person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Applicant.

Public reporting burden for this collection of information is estimated to average hours. This includes the time for collecting, reviewing, and reporting the data. Response to this request for information is required in order to receive the benefits to be derived. Section 232 of the National Housing Act authorizes mortgage insurance for the development of nursing homes and intermediate care facilities. This agency may not collect this information, and you are not required to complete this form unless it displays a currently valid OMB control number. While no assurance of confidentiality is pledged to respondents, HUD generally discloses this data only in response to a Freedom of Information Act request.

LIHEAP Agency:
Person Interviewed:
Date:

Contract #:
Title:
Audit Period:

A. Application Intake

1. Are applications provided immediately to applicants upon the request for the service, including mailing to clients who cannot come into the Office?
2. Are only state approved LIHEAP applications used?
3. Does the agency accept the application originating from the State's website?
4. Does the agency assist applicants, as needed, with the completion of their applications?
5. Are regular LIHEAP applications accepted as described in the Operational Plan and within the time frames as described in the LIHEAP Manual?
6. Does the agency accept applications for crisis assistance through the contract period regardless of the availability of funds?
7. When available funds are expended, does the agency maintain a waiting list during the contract period with carry over from one quarter to the next?
8. Are applicants on the waiting list at year-end required to re-apply for the new program year?
9. What application documentation is maintained in a client file?
10. Are LIHEAP applicants who are interested in weatherization assistance being referred to the Weatherization Assistance Program?

B. Eligibility Determination

1. Is the application reviewed, an eligibility determination made within 30 days, and was the benefit applied within 90 days?

2. Is citizenship or legal alien status verified for all household members?
 - a. How is citizenship or legal alien status verified?
 - b. Does the Agency retain documentation to verify Social Security Numbers?
3. How does the agency handle households with members that do not have a Social Security Number?
4. How does the agency handle households with members that refuse to provide a SSN?
5. How does the agency respond to a client that needs assistance obtaining proof of a Social Security Number?
6. Are current household incomes for customer applications being correctly determined and verified in accordance with the LIHEAP Manual and program regulations?
7. Are the correct federal income eligibility guidelines being observed in determining customer eligibility?
8. Is documentation of uncontrollable circumstances being obtained for emergency crisis applications?
9. Is the client's energy burden being calculated correctly?
 - a. Does the agency require 12 months of energy usage information to calculate energy burden?
 - b. How does the agency handle applications without 12 months of energy usage documentation?
10. Is the Priority Points System being utilized to correctly rank applications and determine benefit levels?
11. How does the Agency determine which households are to receive priority in assistance when sufficient funds are not available to serve all households with the same number of points?
12. How does the Agency ensure that the correct benefit amount is awarded? Does the Agency employ the THO Software System to determine the entitlements under the LIHEAP program?
13. Who approves the benefit amount awarded?
14. Do supervisors review a sample of case files/applications for quality assurance?

a. What method and process do the Agency supervisors use for selecting a sample of client applications for review?

b. How is the review documented?

How does the Agency ensure that crisis applications are processed and assistance is provided in 48 hours, or 18 hours if the household is in a life-threatening situation?

15. Does the Agency ensure that the applicant or any members in the household has not already received assistance in the current federal fiscal year?

16. Does the Agency match the applicant's address on the application with the location for which services are being provided?

C. Security & Maintenance of Records

1. Are procedures in place to safeguard the confidentiality of customer files and to ensure that only authorized personnel have access to the records?

2. Is access to client files restricted?

3. Who has access to client files?

4. How are files secured during working hours?

5. How are files secured after working hours?

6. Are employees trained on client confidentiality, ethical conduct and release of information?

7. How long do you maintain client records?

D. Vendor Agreements with Home Energy Suppliers

1. Are vendor agreements in place for those energy suppliers that are receiving payments?(Need a copy of a current vendor agreement)

2. Does the vendor agreement stipulate that the Home Energy Supplier agree to and abide by the following terms and conditions:
 - a. To participate in the LIHEAP program in accordance with state and federal regulations.
 - b. To accept benefit checks and vouchers on behalf of eligible households for the purpose of providing LIHEAP services for clients identified to receive such benefits.
 - c. To apply benefit check or voucher amounts to the energy accounts of eligible and certified households.
 - d. To record the LIHEAP payments to the Home Energy Supplier's books as a credit to the households' accounts.
 - e. To refund any LIHEAP credit balances to the LIHEAP agency who made the payment on behalf of the customer, if the customer terminates their service.
3. Have any complaints been received by the Agency from the energy suppliers regarding the timely issuance of customer benefit payments?

If so, what action has the Agency taken to address the complaints?
4. Has the Agency or certified eligible LIHEAP recipients identified problems with the Home Energy Supplier not performing in accordance with the vendor agreement?

If so, what action was taken by the Energy Supplier to address the complaint or noncompliance?
5. What controls does the Agency have in place to ensure that energy providers were not suspended or debarred in accordance with the State Plan and federal regulations? (Check website for a current vendor to verify that they are not suspended or debarred)

E. Appeal Procedures

1. Does the Agency have an established formal process and procedures by which customers can file appeals or grievances if LIHEAP assistance is denied or applications are not reviewed and acted upon with reasonable promptness? (If there is an appeal, need examples of correspondence)
2. Are the appeal procedures explained to all potential clients?
3. Are the appeal procedures provided at the time of application denial?

F. Assurance 16 Activities

1. Does the agency participate in Assurance 16 Activities?
 - a. Explain what activities are utilized for Assurance 16?
2. How much of the agency's budget is spent on Assurance 16 Activities?

G. Other Questions

1. Has the agency established termination of services process and procedures by which clients who receive assistance may have such assistance terminated in the event that violation of program requirements occur? (If yes, obtain documentation)
2. How does the agency differentiate regular heating and cooling assistance?
3. Does the agency offer assistance for all fuel types during heating and cooling seasons?
4. Does the Agency have a Continuity of Operations Plan to address emergency preparedness planning in the event of an emergency or threat?
5. What is the agency's procedure if a client seeks to apply for assistance afterhours or when the office is closed?
6. Does the Agency have a Conflict of Interest policy/statement that is signed by all employees involved with the LIHEAP program?
7. Is the Agency submitting program reports, both client services and financial reports, at the frequency prescribed by the state?
8. Does the Agency hold mandated HIPAA Compliance training annually? Is the training documented?

H. Title VI and Civil Rights Compliance

1. Does the Agency have nondiscrimination policies in place in order to not exclude any person from employment or participation in the program based on the grounds of race, color or national origin?
2. Does the Agency comply with its nondiscrimination policies in determining eligibility and service provision?
3. Do the Agency's nondiscrimination policies and procedures include how clients are informed of their Title VI rights?
4. How does the Agency inform its clients of their Title VI rights? Does the Agency have postings regarding nondiscrimination?
5. Do postings, program brochures and other program related materials provided to the public include a non-discrimination statement and complaint procedures?
6. Is multi-lingual information (applications, postings, program brochures, and other program materials) needed and/or provided?
7. Does the Agency have a Limited English Proficiency (LEP) policy and procedures regarding the provision of interpreter/translator services for clients who have limited English speaking abilities?
8. Does the Agency have a Title VI Coordinator whose responsibilities include compliance with Title VI regulations and the handling of discrimination complaints? If so, provide his/her name?
9. Does the Agency have formal procedures for handling discrimination complaints?
10. Does the agency address discrimination complaints in accordance with their nondiscrimination policy and procedures?
11. Has the Agency received any discrimination complaints in the last 3 years?
12. If complaints have been received, have they been investigated and has any action been taken? If so, what was the outcome of the investigation and the action taken?

13. Are employees trained annually regarding Title VI compliance, provisions and servicing clients with Limited English Proficiency? Identify the date of the last training?

14. Does the Agency maintain documentation of the Title VI training provided to staff? (Get copies of Sign-Up sheet)

Summary – summarize any control weaknesses, noncompliance or deficiencies below:

Program	Subrecipient, Contractor, Vendor	Begin/End Dates	Amt of Contract	M/WBE	Desc of Services	Address	Funding	Type of Contract	Comp/NonComp	Statement of Assurance	New Contractor/Subrecipient
ARLP	Clinch Powell RC&D	7/1/17 - 6/30/2018	\$121,341	Yes	Appalachian Renovation Loan Program	Rutledge, TN	Hybrid	Subrecipient	NonComp	No	Yes
Contracts	CGI Federal	10/1/15-9/30/2018	\$4,100	N/A	Agency-wide notification system	Cleveland, OH	THDA	Vendor	NonComp	No	No
Contracts	CGI Federal	10/15/13 - 6/30/18	\$1,533,717	N/A	S8RA Inspection Services	Cleveland, OH	Fed	Vendor	Comp	No	No
Contracts	CGI-AMS	3/1/15-2/28/2019	\$260,000	N/A	S8CA Software Maintenance & Support	Atlanta, GA	Fed	Vendor	NonComp	No	No
Contracts	Community Housing Partners	4/1/13-6/30/22	\$2,250,000	N/A	WAP Training and Inspections	Chrstianburg, VA	Fed	Vendor	Comp	No	No
Contracts	Creative Energy	2/2/15-8/30/18	\$2,119,800	WBE	Media Planning and Buying Services	Johnson City, TN	THDA	Vendor	Comp	No	No
Contracts	D&H USA Corporation	9/15/14-9/15/19	\$500,000	N/A	Mortgage Master Servicing Software and Support	Mary Lake, FL	THDA	Vendor	Comp	No	No
Contracts	DLS Servicing Consultants, LLC	4/15/16-6/30/18	\$33,500	WBE	Loan Servicing Compliance	Grand Rapids, MI	THDA	Vendor	NonComp	No	No
Contracts	Emphasys Computer Solutions	12/17/13-12/16/18	\$120,000	N/A	SYMPRO Finance Software	Charlotte, NC	THDA	Vendor	NonComp	No	No
Contracts	Emphasys Computer Solutions	3/1/14-2/28/19	\$800,000	N/A	S8 Rental Database System Maintenance & Support	Charlotte, NC	Fed	Vendor	NonComp	No	No

Program	Subrecipient, Contractor, Vendor	Begin/End Dates	Amt of Contract	M/WBE	Desc of Services	Address	Funding	Type of Contract	Comp/NonComp	Statement of Assurance	New Contractor/Subrecipient
Contracts	Emphasys Computer Solutions	9/1/14-8/30/19	\$215,000	N/A	S8RA HCV Software (Elite)	Charlotte, NC	Fed	Vendor	NonComp	No	No
Contracts	Executive Selection, Inc.	2/1/15 - 12/31/18	\$30,000	N/A	Leadership Development	Nashville, TN	THDA	Vendor	NonComp	No	No
Contracts	First Tennessee Bank	9/1/16-8/31/21	\$500,000	N/A	Lockbox Services	Nashville, TN	THDA	Vendor	Comp	No	No
Contracts	Fearnly Martin & McDonald, PLLC	12/20/10 - 12/19/20	\$3,167,000	N/A	HHF Title Closing Services and Consultations	Memphis, TN	Fed	Vendor	Comp	No	No
Contracts	FICS	6/1/16-5/30/21	\$555,000	N/A	Loan Servicing Software	Addison, TX	THDA	Vendor	NonComp	No	No
Contracts	Dozen Software (formerly FloCode)	3/1/16-12/31/18	\$200,000	N/A	LOS Consulting	Nashville, TN	THDA	Vendor	NonComp	No	No
Contracts	Five Brothers	9/1/16-8/31/21	\$100,000	N/A	Property Preservation Services	Warren, MI	THDA	Vendor	Comp	No	No
Contracts	Hatteras	9/1/16-8/31/21	\$500,000	N/A	Statement Services	Dearborn, MI	THDA	Vendor	Comp	No	No
Contracts	HomeSource	11/1/15-10/31/18	\$21,600	N/A	S8RA Meeting Space	Knoxville, TN	Fed	Vendor	NonComp	No	No
Contracts	J Phillip Jones	10/16/16-10/15/19	\$100,000	N/A	Foreclosure Services	Nashville, TN	THDA	Vendor	Comp	No	No
Contracts	Jan Wilson	6/20/17-12/31/18	\$1,500	WBE	Leadership Training	Franklin, TN	THDA	Vendor	NonComp	No	No
Contracts	Lee Hecht Harrison	10/14/13-10/31/18	\$46,000	N/A	Job Placement Services	Nashville, TN	THDA	Vendor	NonComp	No	No

Program	Subrecipient, Contractor, Vendor	Begin/End Dates	Amt of Contract	M/WBE	Desc of Services	Address	Funding	Type of Contract	Comp/NonComp	Statement of Assurance	New Contractor/Subrecipient
Contracts	Memphis Property Services	9/1/16-8/31/21	\$100,000	N/A	Property Preservation Services	Memphis, TN	THDA	Vendor	Comp	No	No
Contracts	MoneyGram	12/1/17-11/30/2021	\$100,000	N/A	Wire payment Services	Minneapolis, MN	THDA	Vendor	NonComp	No	No
Contracts	Mortgage Bankers Association	1/16/16-1/15/18	\$14,400	N/A	Servicing Training	Washington, DC	THDA	Vendor	NonComp	No	No
Contracts	NorthHighland	3/31/17-12/31/17	\$25,000	N/A	Head Hunting Services	Atlanta, GA	THDA	Vendor	Comp	No	No
Contracts	Novogradac & Co LLP	8/1/13 - 6/30/18	\$125,000	N/A	Property Appraisals	Bethesda, MD	Fed	Vendor	Comp	No	No
Contracts	Online Rental Exchange	6/30/15 - 6/30/18	\$125,000	N/A	S8RA Criminal Background Checks Online Services	Winterville, NC	Fed	Vendor	NonComp	No	No
Contracts	Oracle/Taleo	4/23/18-4/22/2019	\$55,280	N/A	Applicant Tracking Hosted Software	Redwood Shores, CA	THDA	Vendor	NonComp	No	No
Contracts	Paramore the digital agency LLC	4/1/15 - 2/28/18	\$9,500	WBE	Webhosting	Nashville, TN	THDA	Vendor	NonComp	No	No
Contracts	Paymentus	9/1/16-8/31/21	\$50,000	N/A	Pay by Phone Services	Charlotte, NC	THDA	Vendor	Comp	No	No
Contracts	RSM (formerly McGladery)	2/16/15-7/1/19	\$2,000,000	N/A	IT Consulting for LIHTC/Authority DMS System	Minneapolis, MN	THDA	Vendor	NonComp	No	No

Program	Subrecipient, Contractor, Vendor	Begin/End Dates	Amt of Contract	M/WBE	Desc of Services	Address	Funding	Type of Contract	Comp/NonComp	Statement of Assurance	New Contractor/Subrecipient
Contracts	Rubin Lublin	10/16/16-10/15/19	\$100,000	N/A	Foreclosure Services	Peachtree Corners, GA	THDA	Vendor	Comp	No	No
Contracts	TalentQuest	7/1/14-6/30/18	\$101,000	N/A	Performance Management Software Maintenance and Support	Atlanta, GA	THDA	Vendor	NonComp	No	No
Contracts	TALX Corporation (dba Equifax "Work Number")	1/1/14-12/31/18	\$180,000	N/A	S8RA Employment Verification Service	St. Louis, MO	Fed	Vendor	NonComp	No	No
Contracts	TENA Companies	3/15/17-6/30/18	\$17,000	N/A	Servicing Quality Control Software	St. Paul, MN	THDA	Vendor	Comp	No	No
Contracts	Angela Nelson	2/17/17-12/31/18	\$2,500	WBE	Leadership Training	Nashville, TN	THDA	Vendor	NonComp	No	Yes
Contracts	Allregs/Sallie Mae	8/1/16-7/31/21	\$10,000	N/A	Subscription banking regulations	Washington, DC	THDA	Vendor	NonComp	No	Yes
Contracts	Assurant	3/21/18-3/20/2023	\$100,000	N/A	Property Valuation Services	Chicago, IL	THDA	THDA	Comp	Yes	Yes
Contracts	Bliss Communications	6/1/16-7/1/18	\$16,200	WBE	Leadership Training	Nashville, TN	THDA	Vendor	NonComp	No	Yes
Contracts	Brock & Scott	3/21/18-3/20/2023	\$100,000	N/A	Foreclosure Legal Services	Wilmington, NC	THDA	THDA	Comp	Yes	Yes
Contracts	Charles Palmgren	8/25/17-12/31/18	\$5,000	N/A	Leadership Training	Franklin, TN	THDA	Vendor	NonComp	No	Yes
Contracts	Christin & Associates	11/1/17-10/31/18	\$49,500	N/A	Elite Software Consultant	Petoskey, MI	Fed	THDA	Comp	Yes	Yes

Program	Subrecipient, Contractor, Vendor	Begin/End Dates	Amt of Contract	M/WBE	Desc of Services	Address	Funding	Type of Contract	Comp/NonComp	Statement of Assurance	New Contractor/Subrecipient
Contracts	Cobblestone Systems Corp	6/1/17-5/31/22	\$80,000	N/A	Contract Management Software	Somerdale, NJ	THDA	Vendor	NonComp	No	Yes
Contracts	Compass Auctions & Real Estate	3/21/18-3/20/2023	\$100,000	N/A	Foreclosure Auction Services	Hixson, TN	THDA	THDA	Comp	Yes	Yes
Contracts	CoreLogic	7/1/17-6/30/18	\$16,500	N/A	Housing Market Data	Dallas, TX	THDA	Vendor	NonComp	No	Yes
Contracts	CoreLogic	6/15/16-6/14/21	\$100,000	N/A	Escrow & Claims Processing Services	Dallas, TX	THDA	Vendor	NonComp	No	Yes
Contracts	Enhanced Business Solutions LLC	2/17/17-12/31/18	\$2,500	WBE	Leadership Training	Nashville, TN	THDA	Vendor	NonComp	No	Yes
Contracts	First Rate Field Services	3/21/18-3/20/2023	\$100,000	N/A	Property Preservation Services	Clayton, MO	THDA	THDA	Comp	Yes	Yes
Contracts	Haile Coaching & Leadership LLC	2/15/17-12/31/18	\$8,000	N/A	Leadership Training	Nashville, TN	THDA	Vendor	NonComp	No	Yes
Contracts	Independent Settlement Services	3/21/18-3/20/2023	\$100,000	N/A	Property Valuation Services	Chicago, IL	THDA	THDA	Comp	Yes	Yes
Contracts	MSI LLC	3/21/18-3/20/2023	\$100,000	N/A	Property Preservation Services	Fort Worth, TX	THDA	THDA	Comp	Yes	Yes
Contracts	MTSU	10/1/17-8/31/18	\$7,500	N/A	Housing Market Reports	Murfreesboro, TN	THDA	Vendor	NonComp	No	Yes
Contracts	NeighborWorks America	3/6/18-3/10/18	\$25,400	N/A	HBEI Training Services	Washington, DC	THDA	Vendor	NonComp	No	Yes
Contracts	NeighborWorks America	6/19/18-6/20/18	\$26,000	N/A	HBEI Training Services	Washington, DC	THDA	Vendor	NonComp	No	Yes

Program	Subrecipient, Contractor, Vendor	Begin/End Dates	Amt of Contract	M/WBE	Desc of Services	Address	Funding	Type of Contract	Comp/NonComp	Statement of Assurance	New Contractor/Subrecipient
Contracts	NewCourse	5/15/18-5/14/23	\$500,000	N/A	Monthly Statements	Nashville, TN	THDA	THDA	Comp	Yes	Yes
Contracts	Realtor.com	2/1/18-7/31/18	\$25,000	N/A	Great Choice Ad Campaign-New Media	Scottsdale, AZ	THDA	Vendor	NonComp	No	Yes
Contracts	Rebecca Thompson Consulting	6/20/1-12/29/18	\$5,000	WBE	Leadership Training	Nashville, TN	THDA	Vendor	NonComp	No	Yes
Contracts	Tennessee Association of Broadcasters	2/1/18-4/12/18	\$50,000	N/A	Great Choice Radio Spots Placement	Nashville, TN	THDA	Vendor	NonComp	No	Yes
Contracts	Tennessee Performing Arts Center	1/6/18-1/7/18	\$1,200	N/A	Meeting Space	Nashville, TN	THDA	Vendor	NonComp	No	Yes
ESG 17	Appalachian Regional Coalition on Homelessness	7/1/17 - 6/30/18	\$103,931	N/A	Homeless Services	Johnson City, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Area Relief Ministries	7/1/17 - 6/30/18	\$135,000	N/A	Homeless Services	Jackson, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Bridges Domestic Violence Center	7/1/17 - 6/30/18	\$60,000	N/A	Homeless Services	Franklin, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Buffalo Valley, Inc	7/1/17 - 6/30/18	\$185,000	N/A	Homeless Services	Hohenwald, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Carey Counseling Center, Inc.	7/1/17 - 6/30/18	\$83,000	N/A	Homeless Services	Paris, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Change is Possible	7/1/17 - 6/30/18	\$100,000	N/A	Homeless Services	Erwin, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Crossville Housing Development Corporation	7/1/17 - 6/30/18	\$100,000	N/A	Homeless Services	Crossville, TN	Fed	Subrecipient	Comp	Yes	No

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ESG 17	Families in Crisis	7/1/17 - 6/30/18	\$125,000	N/A	Homeless Services	McMinnville, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Family Promise of Blount County	7/1/17 - 6/30/18	\$170,000	N/A	Homeless Services	Alcoa, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Family Promise of Greater Johnson City, Inc.	7/1/17 - 6/30/18	\$76,700	N/A	Homeless Services	Johnson City, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Family Promise of Greater Kingsport	7/1/17 - 6/30/18	\$50,000	N/A	Homeless Services	Kingsport, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Fayette Cares, Inc.	7/1/17 - 6/30/18	\$85,000	N/A	Homeless Services	Somerville, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Good Neighbor Mission	7/1/17 - 6/30/18	\$40,000	N/A	Homeless Services	Gallatin, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Greater Kingsport Alliance for Development	7/1/17 - 6/30/18	\$65,000	N/A	Homeless Services	Kingsport, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Helen Ross McNabb Center	7/1/17 - 6/30/18	\$77,000	N/A	Homeless Services	Knoxville, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Johnson County Safe Haven, Inc.	7/1/17 - 6/30/18	\$100,000	N/A	Homeless Services	Mountain City, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Scott County Homeless Shelter	7/1/17 - 6/30/18	\$85,000	N/A	Homeless Services	Huntsville, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Tennessee Homeless Solutions	7/1/17 - 6/30/18	\$150,000	N/A	Homeless Services	Lexington, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	The Journey Home, Inc.	7/1/17 - 6/30/18	\$85,000	N/A	Homeless Services	Murfreesboro, TN	Fed	Subrecipient	Comp	Yes	No

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ESG 17	Trinity Outreach Center of Hope	7/1/17 - 6/30/18	\$55,590	N/A	Homeless Services	Oak Ridge, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	Wo/Men's Resource and Rape Assistance Program	7/1/17 - 6/30/18	\$130,000	N/A	Homeless Services	Jackson, TN	Fed	Subrecipient	Comp	Yes	No
ESG 17	City of Clarksville	7/1/17 - 6/30/18	\$198,875	N/A	Homeless Services	Clarksville, TN	Fed	Subrecipient	NonComp	Yes	No
ESG 17	City of Cleveland	7/1/17 - 6/30/18	\$55,900	N/A	Homeless Services	Cleveland, TN	Fed	Subrecipient	NonComp	Yes	No
ESG 17	City of Johnson City	7/1/17 - 6/30/18	\$196,241	N/A	Homeless Services	Johnson City, TN	Fed	Subrecipient	NonComp	Yes	No
ESG 17	City of Knoxville	7/1/17 - 6/30/18	\$198,875	N/A	Homeless Services	Knoxville, TN	Fed	Subrecipient	NonComp	Yes	No
ESG 17	City of Murfreesboro	7/1/17 - 6/30/18	\$198,875	N/A	Homeless Services	Murfreesboro, TN	Fed	Subrecipient	NonComp	Yes	No
ESG 17	Fairview Housing Management Corporation	7/1/17 - 6/30/18	\$35,000	N/A	Homeless Services	Johnson City, TN	Fed	Subrecipient	Comp	Yes	Yes
ESG 17	First Tennessee Human Resources Agency	7/1/17 - 6/30/18	\$48,944	N/A	Homeless Services	Johnson City, TN	Fed	Subrecipient	Comp	Yes	Yes
ESG 17	Jesus Cares - McNairy County	7/1/17 - 6/30/18	\$35,000	N/A	Homeless Services	Selmer, TN	Fed	Subrecipient	Comp	Yes	Yes
ESG 17	Ministerial Association Temporary Shelter, Inc.	7/1/17 - 6/30/18	\$95,000	N/A	Homeless Services	Morristown, TN	Fed	Subrecipient	Comp	Yes	Yes
HHF BEP	Jacobs Ladder CDC	7/1/17 - 6/30/2018	\$0	N/A	Blight Elimination	Memphis, TN	Fed	Subrecipient	NonComp	No	No

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HHF BEP	Oakridge Landbank	7/1/17 - 6/30/2018	\$74,318	Yes	Blight Elimination	Oakridge, TN	Fed	Subrecipient	NonComp	No	No
HHF BEP	Chattanooga Neighborhood Enterprise	7/1/17 - 6/30/2018	\$22,200	N/A	Blight Elimination	Chattanooga, TN	Fed	Subrecipient	NonComp	No	No
HHF BEP	United Housing, Inc.	7/1/17 - 6/30/2018	\$85,247	Yes	Blight Elimination	Memphis, TN	Fed	Subrecipient	NonComp	No	No
HHF BEP	Community Redevelopment Agency	7/1/17 - 6/30/2018	\$50,000	N/A	Blight Elimination	Jackson, TN	Fed	Subrecipient	NonComp	No	Yes
HHF BEP	Frayser CDC	7/1/17 - 6/30/2018	\$23,863	Yes	Blight Elimination	Memphis, TN	Fed	Subrecipient	NonComp	No	Yes
HHF BEP	Neighborhood Preservation Inc.	7/1/17 - 6/30/2018	\$2,180	Yes	Blight Elimination	Memphis, TN	Fed	Subrecipient	NonComp	No	Yes
HOME 1516	Community Housing Partnership of Williamson County	7/6/17 - 6/30/19	\$113,000	N/A	Housing Development	Franklin, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Community Housing Partnership of Williamson County	2/26/18 - 6/30/19	\$97,420	N/A	Housing Development	Franklin, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Clinch Powell RCDC	8/14/17 - 6/30/19	\$105,276	N/A	Housing Development	Rutledge, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Clinch Powell RCDC	7/6/17 - 6/30/19	\$105,276	N/A	Housing Development	Rutledge, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Creative Compassion, Inc.	6/26/18 - 6/30/19	\$108,000	N/A	Housing Development	Crossville, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Creative Compassion, Inc.	6/6/18 - 6/30/19	\$108,000	N/A	Housing Development	Crossville, TN	Fed	Subrecipient	Comp	Yes	No

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HOME 1516	Creative Compassion, Inc.	6/8/18 - 6/30/19	\$108,000	N/A	Housing Development	Crossville, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Eastern Eight Community Development Corporation	7/20/17 - 6/30/19	\$103,212	N/A	Housing Development	Johnson City, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Eastern Eight Community Development Corporation	10/30/17 - 6/30/19	\$103,212	N/A	Housing Development	Johnson City, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Eastern Eight Community Development	7/26/17 - 6/30/19	\$103,212	N/A	Housing Development	Johnson City, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Eastern Eight Community Development Corporation	10/13/17 - 6/30/19	\$52,152	N/A	Housing Development	Johnson City, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Eastern Eight Community Development Corporation	7/17/17 - 6/30/19	\$103,212	N/A	Housing Development	Johnson City, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Woodbine Community Organization	1/5/18 - 6/30/19	\$100,000	N/A	Housing Development	Nashville, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Woodbine Community	6/29/18 - 6/30/19	\$100,000	N/A	Housing Development	Nashville, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Woodbine Community Organization	6/29/18 - 6/30/19	\$100,000	N/A	Housing Development	Nashville, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Woodbine Community Organization	4/20/18 - 6/30/19	\$100,000	N/A	Housing Development	Nashville, TN	Fed	Subrecipient	Comp	Yes	No
HOME 1516	Woodbine Community Organization	4/20/18 - 6/30/19	\$100,000	N/A	Housing Development	Nashville, TN	Fed	Subrecipient	Comp	Yes	No

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HOME 17	City of Dyersburg	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Dyersburg, TN	Fed	Subrecipient	Comp	Yes	No
HOME 17	City of Gatlinburg	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Gatlinburg, TN	Fed	Subrecipient	Comp	Yes	No
HOME 17	Haywood County	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Brownsville, TN	Fed	Subrecipient	Comp	Yes	No
HOME 17	City of Hendersonville	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Hendersonville, TN	Fed	Subrecipient	Comp	Yes	No
HOME 17	City of Newport	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Newport, TN	Fed	Subrecipient	Comp	Yes	No
HOME 17	Clinch Powell RCDC	7/1/17 - 6/30/20	\$30,000	N/A	Operating Assistance	Rutledge, TN	Fed	Subrecipient	Comp	Yes	No
HOME 17	Clinch Powell RCDC	11/20/17 - 6/30/20	\$105,276	N/A	Housing Development	Rutledge, TN	Fed	Subrecipient	Comp	Yes	No
HOME 17	Clinch Powell RCDC	3/7/18 - 6/30/20	\$106,013	N/A	Housing Development	Rutledge, TN	Fed	Subrecipient	Comp	Yes	No
HOME 17	Bedford County	7/1/17 - 6/30/20	\$500,000	N/A	Housing Development	Shelbyville, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	City of Cedar Hill	7/1/17 - 6/30/20	\$500,000	N/A	Housing Development	Cedar Hill, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	City of Dayton	7/1/17 - 6/30/20	\$250,000	N/A	Housing Rehabilitation	Dayton, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	City of Elizabethton	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Elizabethton, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	Town of Greeneville	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Greeneville, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	Town of Halls	7/1/17 - 6/30/20	\$250,000	N/A	Housing Rehabilitation	Halls, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	City of Harriman	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Harriman, TN	Fed	Subrecipient	Comp	Yes	Yes

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HOME 17	Lauderdale County	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Ripley, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	City of Lexington	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Lexington, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	Lincoln County	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Fayetteville, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	City of McEwen	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	McEwen, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	Town of Mountain City	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Mountain City, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	City of Niota	7/1/17 - 6/30/20	\$250,000	N/A	Housing Rehabilitation	Niota, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	Town of Obion	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Obion, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	Rhea County	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	Dayton, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	Southwest TN Community Development Corporation	9/1/17 - 6/30/20	\$22,750	N/A	Operating Assistance	Henderson, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	Neighborhood Housing, Inc	6/6/18 - 6/30/20	\$105,000	N/A	Housing Development	Knoxville, TN	Fed	Subrecipient	Comp	Yes	Yes
HOME 17	City of LaVergne	7/1/17 - 6/30/20	\$500,000	N/A	Housing Rehabilitation	LaVergne, TN	Fed	Subrecipient	Comp	Yes	No
LIHEAP 17	Blount Co Community Action	7/1/17 - 6/30/18	\$857,827	N/A	Assistance to LI HH paying energy bills	Maryville, TN	Fed	Subrecipient	NonComp	Yes	No

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LIHEAP 17	Bradley Cleveland Community Services	7/1/17 - 6/30/18	\$879,386	N/A	Assistance to LI HH paying energy bills	Cleveland, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Chattanooga HSD	7/1/17 - 6/30/18	\$2,656,039	N/A	Assistance to LI HH paying energy bills	Chattanooga, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Clarksville-Montgomery County CAA	7/1/17 - 6/30/18	\$1,262,992	N/A	Assistance to LI HH paying energy bills	Clarksville, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Delta HRA	7/1/17 - 6/30/18	\$1,016,893	N/A	Assistance to LI HH paying energy bills	Covington, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Douglas Cherokee Economic Authority	7/1/17 - 6/30/18	\$2,881,791	N/A	Assistance to LI HH paying energy bills	Morristown, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	East TN HRA	7/1/17 - 6/30/18	\$2,168,724	N/A	Assistance to LI HH paying energy bills	Knoxville, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Highland Rim Economic Corp	7/1/17 - 6/30/18	\$702,603	N/A	Assistance to LI HH paying energy bills	Erin, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Knoxville-Knox Co Community Action	7/1/17 - 6/30/18	\$3,501,750	N/A	Assistance to LI HH paying energy bills	Knoxville, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Metropolitan Action Commission	7/1/17 - 6/30/18	\$5,705,758	N/A	Assistance to LI HH paying energy bills	Nashville, TN	Fed	Subrecipient	NonComp	Yes	No

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LIHEAP 17	Mid-Cumberland Community Action	7/1/17 - 6/30/18	\$4,465,207	N/A	Assistance to LI HH paying energy bills	Lebanon, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Mid-East Community Action Agency	7/1/17 - 6/30/18	\$790,071	N/A	Assistance to LI HH paying energy bills	Kingston, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Northwest TN Economic Dev Council	7/1/17 - 6/30/18	\$2,380,791	N/A	Assistance to LI HH paying energy bills	Dresden, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Shelby Co Community Services	7/1/17 - 6/30/18	\$9,660,034	N/A	Assistance to LI HH paying energy bills	Memphis, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	South Central HRA	7/1/17 - 6/30/18	\$3,517,465	N/A	Assistance to LI HH paying energy bills	Fayetteville, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Southeast TN HRA	7/1/17 - 6/30/18	\$1,793,325	N/A	Assistance to LI HH paying energy bills	Dunlap, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Southwest HRA	7/1/17 - 6/30/18	\$2,444,253	N/A	Assistance to LI HH paying energy bills	Henderson, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Upper Cumberland HRA	7/1/17 - 6/30/18	\$3,305,774	N/A	Assistance to LI HH paying energy bills	Cookeville, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP 17	Upper East TN HDA	7/1/17 - 6/30/18	\$4,610,583	N/A	Assistance to LI HH paying energy bills	Kingsport, TN	Fed	Subrecipient	NonComp	Yes	No

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LIHEAP Wx 17	Bradley Cleveland Community Services	7/1/17 - 6/30/18	\$47,279	N/A	EE Improve for Low Income HH	Cleveland, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP Wx 17	Clarksville-Montgomery County CAA	7/1/17 - 6/30/18	\$67,903	N/A	EE Improve for Low Income HH	Clarksville, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP Wx 17	Delta HRA	7/1/17 - 6/30/18	\$103,346	N/A	EE Improve for Low Income HH	Covington, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP Wx 17	East TN HRA	7/1/17 - 6/30/18	\$271,533	N/A	EE Improve for Low Income HH	Knoxville, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP Wx 17	Knoxville-Knox Co Community Action	7/1/17 - 6/30/18	\$276,863	N/A	EE Improve for Low Income HH	Knoxville, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP Wx 17	MDHA	7/1/17 - 6/30/18	\$306,761	N/A	EE Improve for Low Income HH	Nashville, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP Wx 17	Mid-Cumberland Community Action	7/1/17 - 6/30/18	\$240,065	N/A	EE Improve for Low Income HH	Lebanon, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP Wx 17	South Central HRA	7/1/17 - 6/30/18	\$189,111	N/A	EE Improve for Low Income HH	Fayetteville, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP Wx 17	SE TN HRA	7/1/17 - 6/30/18	\$239,213	N/A	EE Improve for Low Income HH	Dunlap, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP Wx 17	Southwest HRA	7/1/17 - 6/30/18	\$210,737	N/A	EE Improve for Low Income HH	Henderson, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP Wx 17	Upper Cumberland HRA	7/1/17 - 6/30/18	\$177,730	N/A	EE Improve for Low Income HH	Cookeville, TN	Fed	Subrecipient	NonComp	Yes	No

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LIHEAP Wx 17	Upper East TN HDA	7/1/17 - 6/30/18	\$247,881	N/A	EE Improve for Low Income HH	Kingsport, TN	Fed	Subrecipient	NonComp	Yes	No
LIHEAP Wx 17	City of Memphis	7/1/17 - 6/30/18	\$519,357	N/A	EE Improve for Low Income HH	Memphis, TN	Fed	Subrecipient	NonComp	Yes	Yes
NHTF 16	Cleveland Summit, LP	5/1/18 - 4/30/21	\$516,532	N/A	Housing Development	Nashville, TN	Fed	Subrecipient	Comp	Yes	Yes
NHTF 16	Dismas, Inc.	5/1/18 - 4/30/21	\$700,536	N/A	Housing Development	Nashville, TN	Fed	Subrecipient	Comp	Yes	Yes
NHTF 16	Franklin Housing Authority	5/1/18 - 4/30/21	\$732,997	N/A	Housing Development	Franklin, TN	Fed	Subrecipient	Comp	Yes	Yes
NHTF 16	Kingsport Housing & Redevelopment Authority	5/1/18 - 4/30/21	\$749,935	N/A	Housing Development	Kingsport, TN	Fed	Subrecipient	Comp	Yes	Yes
PRRPLE	FORT CAMPBELL FCU	7/1/2017 - 6/30/2018	\$36,364	Unknown	PRRPLE w/ Lien Extinguishme nt	Clarksville, TN	Federal	Subrecipient	NonComp	N	No
PRRPLE	MACON BANK AND TRUST COMPANY	7/1/2017 - 6/30/2018	\$19,975	Unknown	PRRPLE w/ Recast	Lafayette, TN	Federal	Subrecipient	NonComp	N	No
PRRPLE	OCWEN LOAN SERVICING, INC	7/1/2017 - 6/30/2018	\$39,883	Unknown	PRRPLE w/ Lien Extinguishme nt	West Palm Beach, FL	Federal	Subrecipient	NonComp	N	No
PRRPLE	RUSHMORE LOAN MANAGEMENT	7/1/2017 - 6/30/2018	\$33,996	Unknown	PRRPLE w/ Recast	New York, NY	Federal	Subrecipient	NonComp	N	No
PRRPLE	SELECT PORTFOLIO SERVICING INC	7/1/2017 - 6/30/2018	\$73,583	Unknown	PRRPLE w/ Recast	Salt Lake City, UT	Federal	Subrecipient	NonComp	N	No

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PRRPLE	US BANK HOME MORTGAGE	7/1/2017 - 6/30/2018	\$4,221	Unknown	PRRPLE w/ Lien Extinguishment	Minneapolis, MN	Federal	Subrecipient	NonComp	N	No
ROP	BANK OF AMERICA	7/1/2017 - 6/30/2018	\$18,512.83	Unknown	Reinstatement Only Program	Thousand Oaks, CA	Federal	Subrecipient	NonComp	N	No
ROP	BAYVIEW LOAN SERVICING, LLC	7/1/2017 - 6/30/2018	\$14,967.92	Unknown	Reinstatement Only Program	Coral Gables, FL	Federal	Subrecipient	NonComp	N	No
ROP	CARRINGTON MORTGAGE SERVICES	7/1/2017 - 6/30/2018	\$17,820.99	Unknown	Reinstatement Only Program	Anaheim, CA	Federal	Subrecipient	NonComp	N	No
ROP	FIFTH THIRD BANK	7/1/2017 - 6/30/2018	\$1,365.24	Unknown	Reinstatement Only Program	Cincinnati, OH	Federal	Subrecipient	NonComp	N	No
ROP	FREEDOM MORTGAGE CORP	7/1/2017 - 6/30/2018	\$1,628.16	Unknown	Reinstatement Only Program	Mount Laurel, NJ	Federal	Subrecipient	NonComp	N	No
ROP	FSB - CENLAR	7/1/2017 - 6/30/2018	\$13,084.18	Unknown	Reinstatement Only Program	Union City, TN	Federal	Subrecipient	NonComp	N	No
ROP	M & T BANK	7/1/2017 - 6/30/2018	\$3,470.40	Unknown	Reinstatement Only Program	Buffalo, NY	Federal	Subrecipient	NonComp	N	No
ROP	MIDLAND MORTGAGE	7/1/2017 - 6/30/2018	\$13,855.82	Unknown	Reinstatement Only Program	Oklahoma City, OK	Federal	Subrecipient	NonComp	N	No
ROP	OCWEN LOAN SERVICING, INC	7/1/2017 - 6/30/2018	\$2,368.51	Unknown	Reinstatement Only Program	West Palm Beach, FL	Federal	Subrecipient	NonComp	N	No
ROP	PHH MORTGAGE CORPORATION	7/1/2017 - 6/30/2018	\$16,742.80	Unknown	Reinstatement Only Program	Mt. Laurel NJ	Federal	Subrecipient	NonComp	N	No

Program	Subrecipient, Contractor, Vendor	Begin/End Dates	Amt of Contract	M/WBE	Desc of Services	Address	Funding	Type of Contract	Comp/NonComp	Statement of Assurance	New Contractor/Subrecipient
ROP	QUICKEN LOANS, INC.	7/1/2017 - 6/30/2018	\$6,545.77	Unknown	Reinstatement Only Program	Detroit, MI	Federal	Subrecipient	NonComp	N	No
ROP	RUSHMORE LOAN MANAGEMENT	7/1/2017 - 6/30/2018	\$6,191.25	Unknown	Reinstatement Only Program	New York, NY	Federal	Subrecipient	NonComp	N	No
ROP	US BANK	7/1/2017 - 6/30/2018	\$68,473.58	Unknown	Reinstatement Only Program	Minneapolis, MN	Federal	Subrecipient	NonComp	N	No
ROP	WELLS FARGO BANK	7/1/2017 - 6/30/2018	\$8,790.76	Unknown	Reinstatement Only Program	Sioux Falls, SD	Federal	Subrecipient	NonComp	N	No
WAP 17	Bradley Cleveland Community Services	7/1/17 - 6/30/18	\$58,974	N/A	Energy Efficiency Improve for LI HH	Cleveland, TN	Fed	Subrecipient	NonComp	Yes	No
WAP 17	Clarksville-Montgomery County CAA	7/1/17 - 6/30/18	\$84,700	N/A	Energy Efficiency Improve for LI HH	Clarksville, TN	Fed	Subrecipient	NonComp	Yes	No
WAP 17	Delta HRA	7/1/17 - 6/30/18	\$128,910	N/A	Energy Efficiency Improve for LI HH	Covington, TN	Fed	Subrecipient	NonComp	Yes	No
WAP 17	East TN HRA	7/1/17 - 6/30/18	\$338,701	N/A	Energy Efficiency Improve for LI HH	Knoxville, TN	Fed	Subrecipient	NonComp	Yes	No
WAP 17	Knoxville-Knox Co Community Action	7/1/17 - 6/30/18	\$345,349	N/A	Energy Efficiency Improve for LI HH	Knoxville, TN	Fed	Subrecipient	NonComp	Yes	No
WAP 17	MDHA	7/1/17 - 6/30/18	\$382,644	N/A	Energy Efficiency Improve for LI HH	Nashville, TN	Fed	Subrecipient	NonComp	Yes	No

Program	Subrecipient, Contractor, Vendor	Begin/End Dates	Amt of Contract	M/WBE	Desc of Services	Address	Funding	Type of Contract	Comp/NonComp	Statement of Assurance	New Contractor/Subrecipient
WAP 17	Mid-Cumberland Community Action	7/1/17 - 6/30/18	\$299,499	N/A	Energy Efficiency Improve for LI HH	Lebanon, TN	Fed	Subrecipient	NonComp	Yes	No
WAP 17	South Central HRA	7/1/17 - 6/30/18	\$235,891	N/A	Energy Efficiency Improve for LI HH	Fayetteville, TN	Fed	Subrecipient	NonComp	Yes	No
WAP 17	SE TN HRA	7/1/17 - 6/30/18	\$298,386	N/A	Energy Efficiency Improve for LI HH	Dunlap, TN	Fed	Subrecipient	NonComp	Yes	No
WAP 17	Southwest HRA	7/1/17 - 6/30/18	\$262,866	N/A	Energy Efficiency Improve for LI HH	Henderson, TN	Fed	Subrecipient	NonComp	Yes	No
WAP 17	Upper Cumberland HRA	7/1/17 - 6/30/18	\$221,694	N/A	Energy Efficiency Improve for LI HH	Cookeville, TN	Fed	Subrecipient	NonComp	Yes	No
WAP 17	Upper East TN HDA	7/1/17 - 6/30/18	\$309,198	N/A	Energy Efficiency Improve for LI HH	Kingsport, TN	Fed	Subrecipient	NonComp	Yes	No
WAP 17	City of Memphis	7/1/17 - 6/30/18	\$647,828	N/A	Energy Efficiency Improve for LI HH	Memphis, TN	Fed	Subrecipient	NonComp	Yes	Yes