



TITLE VI COMPLIANCE REPORT & IMPLEMENTATION PLAN

FISCAL YEAR 2019-2020

TENNESSEE HOUSING DEVELOPMENT AGENCY
ANDREW JACKSON BUILDING, THIRD FLOOR
502 DEADERICK ST.
NASHVILLE, TN 37243-0900
(615)815-2200
TDDY (615)532-2894
WWW.THDA.ORG

TABLE OF CONTENTS

I.	OVERVIEW	4
	A. HOMEOWNERSHIP	4
	B. DEVELOPMENT & PRESERVATION OF AFFORDABLE RENTAL UNITS	5
	C. RENTAL ASSISTANCE	6
	D. HOMELESSNESS PREVENTION & SOLUTIONS	6
	E. REHABILITATION, REPAIR, WEATHERIZATION & ENERGY ASSISTANCE.....	6
	F. OTHER HOUSING RELATED INITIATIVES	7
	G. GOVERNANCE/BOARD OF DIRECTORS	7
II.	RESPONSIBLE OFFICIALS.....	9
III.	DEFINITIONS	10
IV.	NON-DISCRIMINATION POLICY	13
V.	ORGANIZATION OF THE CIVIL RIGHTS OFFICE/CIVIL RIGHTS COORDINATOR	14
VI.	DISCRIMINATORY PRACTICES.....	16
VII.	FEDERAL PROGRAMS OR ACTIVITIES	17
VIII.	DATA COLLECTION AND ANALYSIS.....	20
	A. DESCRIPTION OF DATA COLLECTION	20
	B. MINORITY REPRESENTATION OF BENEFICIARIES	20
	C. MINORITY REPRESENTATION OF THDA STAFF	22
IX.	LIMITED ENGLISH PROFICIENCY.....	23
	A. LEP POLICY	23
	B. ORAL INTERPRETATION	23
	C. WRITTEN DOCUMENT TRANSLATION	24
	D. LANGUAGE ENCOUNTERS	24
	E. EFFORTS TO BREAK DOWN BARRIERS	25
X.	COMPLAINT PROCEDURES.....	27
	A. COMPLAINTS PROCEDURE	27
	B. COMPLAINT FORM	30
	C. COMPLAINTS & LAWSUITS	30
XI.	TITLE VI TRAINING PLAN	31
	A. STAFF TRAINING.....	31
	B. SPONSORSHIPS OF NON-DISCRIMINATION TRAINING/EVENTS	32
	C. SUB-RECIPIENT TRAINING	32
	D. OTHER TRAINING.....	32
XII.	SUB-RECIPIENT MONITORING	34
	A. PRE-AWARD PROCEDURES (INC. TRAINING)	34
	B. POST-AWARD PROCEDURES (INC. TRAINING)	36
	C. PROCEDURES FOR NONCOMPLIANCE	40
	D. SUB-RECIPIENTS & VENDORS.....	40
XIII.	PUBLIC NOTICE AND OUTREACH.....	42
	A. INFORMATION DISSEMINATION	42
	B. BOARDS AND ADVISORY BOARDS	44
	C. MINORITY INPUT & BIDDING OPPORTUNITIES	45
XIV.	COMPLIANCE REPORTING	50

XV.	EVALUATION PROCEDURES.....	51
	A. COMPLIANCE MONITORING	51
	B. CONSOLIDATED PLANNING.....	51
	C. BENEFICIARY REPORTS	53
	D. HOUSING CHOICE VOUCHER ANNUAL & FIVE YEAR PLANS	53
	E. ADDITIONAL ACTIVITIES/DEFICIENCIES	53
XVI.	APPENDICES	
	APPENDIX A	THDA BOARD OF DIRECTORS TABLE
	APPENDIX B	THDA ORGANIZATION CHARTS
	APPENDIX C	THDA NON-DISCRIMINATION IN SERVICES POLICY
	APPENDIX D	COPIES OF FEDERAL FINANCIAL ASSURANCES
	APPENDIX E	THDA POLICY PROVIDING MEANINGFUL ACCESS TO PERSONS WITH LIMITED ENGLISH PROFICIENCY
	APPENDIX F	THDA LANGUAGE ACCESS PLAN
	APPENDIX G	LIST OF THDA BILINGUAL EMPLOYEES
	APPENDIX H	LIST OF ALL TRANSLATED DOCUMENTS & COPIES OF THDA TRANSLATED DOCUMENTS
	APPENDIX I	COPIES OF TRANSLATED PUBLIC NOTICES, SUMMARIES, SURVEYS FOR CONSOLIDATED PLANNING
	APPENDIX J	THDA DISCRIMINATION COMPLAINT FORM
	APPENDIX K	THDA NONDISCRIMINATION TRAINING MATERIALS (NEW EMPLOYEE & ANNUAL)
	APPENDIX L	THDA NON-DISCRIMINATION IN SERVICES SELF SURVEY FORM
	APPENDIX M	SUB-RECIPIENT ONLINE NONDISCRIMINATION TRAINING PRESENTATION
	APPENDIX N	FEDERAL MONITORING FORMS (HOME, ESG, LIHEAP/WAP PROGRAMS)
	APPENDIX O	LIST OF THDA SUB-RECIPIENTS & VENDORS
	APPENDIX P	LIST OF NEW THDA SUB-RECIPIENTS & VENDORS

I. OVERVIEW

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). As Tennessee's HFA, THDA engages in activities to increase and sustain affordable homeownership and rental housing opportunities, primarily targeted to low- and moderate-income homebuyers and very low and low-income renters and/or special populations. To this end, THDA serves as the primary administrator for numerous federal and state housing and housing-related programs described below. Detailed program descriptions and administrative and policy manuals for individual programs are available on THDA's website at www.thda.org.

A. Homeownership

THDA is authorized to issue tax-exempt Mortgage Revenue Bonds to support financing opportunities for first-time homebuyers and veterans through its Great Choice Loan Programs. Great Choice offers a low, fixed rate, 30-year first mortgage loan. Great Choice Plus combines the Great Choice first mortgage with downpayment assistance, providing the borrower with up to \$7,500 for down payment and closing cost assistance through a 15-year second mortgage loan at the same interest rate as the first mortgage. Active and retired members of the military receive a half percent reduction on the interest rate through the Homeownership for the Brave program.

THDA is not a direct lender to borrowers but works with approved mortgage lenders ("Originating Agents" or "OAs") from across Tennessee to originate its loans. THDA underwrites loan applications submitted by OAs, and then commits to purchase pre-approved loans after closing. The servicing department within THDA, known as Volunteer Mortgage Loan Servicing (VMLS), services all THDA loans. Additionally, to promote successful homeownership and help families avoid foreclosure, THDA provides non-profit organizations with tools to teach homebuyer education classes and provide foreclosure prevention through THDA's Homebuyer Education Initiative (HBEI).

The proceeds from the *mortgage loan program* allow THDA to fund the HBEI along with the *Tennessee Housing Trust Fund (THTF)*, which funds various programs that benefit low- and very low-income elderly and special needs Tennesseans. Grants are awarded to, and administered by, cities, counties, development districts, public housing authorities (PHAs), and non-profit organizations. The THTF includes the *New Start Loan Program*, which is delivered through non-profit partners, supports the construction of new homes for low- and very-low income Tennesseans. Habitat for Humanity of Tennessee has been provided an annual allocation of funds since July 2014 to provide funding to statewide Habitat affiliates for the new construction of single-family homes.

THDA utilizes funding from the *HOME Investment Partnership* program, which is a formula grant program funded by the Department of Housing and Urban Development (HUD), to promote the production, preservation and rehabilitation of single-family housing for low-income households. HOME funds are awarded through a competitive application process to cities, counties and non-profit organizations outside local participating jurisdictions or those local governments in Tennessee that receive HOME funds directly from HUD¹.

B. Development & Preservation of Affordable Rental Units

THDA strives to increase the supply of affordable rental units in Tennessee and to help extremely-, very- and low-income households afford rental units through numerous programs. THDA works with developers that build or rehabilitate housing affordable to households at various lower income levels through the *Tax Exempt Multi-Family Bond Authority Program (MTBA)*, the *Low Income Housing Tax Credit (LIHC)* program and the *Tennessee and National Housing Trust Funds*. Through the *MTBA* program, THDA allocates authority for local entities to issue tax-exempt multifamily bonds to provide financing for affordable multifamily rental developments. As the state's administrator for the *LIHC*, THDA competitively awards credits to project sponsors/ developers who raise capital to build affordable rental housing projects affordable for low-income households by selling the credits to investors. THDA also administers the *Community Investment Tax Credit* program in cooperation with the Tennessee Department of Revenue. Through the *CITC*, financial institutions may obtain a credit against the sum total of taxes imposed by the Franchise and Excise Tax Laws when qualified loans, qualified investments, grants, or contributions are extended to eligible housing entities for engaging in eligible low-income housing activities.

THDA funds several rental development programs through the *Tennessee Housing Trust Fund (THTF)*. The *Competitive Grants* program competitively grants funding to local communities, non-profits, PHAS and development districts to develop and/or preserve affordable rental housing for the elderly and those with special needs, including persons with mental, physical, or developmental disabilities, individuals recovering from substance addiction, victims of domestic violence, veterans with multiple needs, youth aging out of foster care and ex-offenders re-entering society. THDA partners with the Department of Mental Health and Substance Abuse Services to expand permanent recovery housing options for individuals recovering from an Opioid Use Disorder (OUD) through the *Creating Homes Initiative (CHI) 2 program*.

The *National Housing Trust Fund (NHTF)* is a HUD funded formula grant program. THDA competitively grants NHTF to non-profit organizations and PHAs for the production, preservation, rehabilitation, and operation of affordable rental housing for extremely low-income households (those earning 30 percent or less AMI).

¹ The Local PJs are Clarksville, Chattanooga, Jackson, Knoxville, Memphis, Nashville-Davidson County, Knox County, Shelby County, and the Northeast Tennessee/Virginia Consortium (the cities of Bristol, Kingsport, Johnson City, Bluff City, Sullivan County, and Washington County, excluding the Town of Jonesborough).

C. Rental Assistance

In addition to rental development programs, THDA administers programs funded by HUD that help extremely-, very- and low-income households afford rent payments in both privately owned rental housing and housing complexes with a HUD project based rental assistance contract. THDA directly administers the *Housing Choice Voucher (HCV) Program*, which provides rental and utility assistance payments for extremely-, very-, and low-income households across the state. In the HCV program, the participant pays up to 30 percent of their monthly-adjusted income for rent and utilities in a privately owned property. THDA pays the remainder directly to the property owner with qualifying participants also receiving a utility assistance payment. Additionally, THDA monitors *HUD project based Section 8 properties* across the state for compliance with federal regulations and guidance and makes qualifying housing and utility assistance payments to the properties through a performance based Annual Contributions Contract (ACC) with HUD.

D. Homelessness Prevention & Solutions

The *Emergency Solutions Grant (ESG)* program is a federally funded (HUD) formula grant program designed to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons to regain stability quickly in permanent housing after experiencing a housing crisis and/or homelessness. THDA is the state administrator for ESG and competitively awards ESG funds across the state to local governments and non-profit organizations outside of “entitlement communities” that receive their own ESG funding directly from HUD².

E. Rehabilitation, Repair, Weatherization & Energy Assistance

THDA administers several programs that help very- and low-income households with home rehabilitation, repair, weatherization and assistance with energy bills (heating and cooling). In all of the programs, THDA grants funds to sub-recipient agencies (Community Action Agencies, Community Housing Development Organizations, Economic Development Councils, and Human Resource Agencies), who serve local or regional areas and work directly with eligible households.

THDA’s federally funded *HOME* program funds the preservation and rehabilitation of single-family housing for low-income households outside local participating jurisdictions through grants to cities, counties and non-profit organizations, who directly administer the funds at the local level.

² Entitlement communities that receive their own allocation of ESG funds in Tennessee are Chattanooga, Memphis, and Nashville-Davidson County.
Tennessee Housing Development Agency
2019-20 Title VI Implementation Plan

The *Low Income Home Energy Assistance (LIHEAP)* Program is funded through the Department of Health and Human Services (DHHS) and provides one time and crisis assistance with home energy bills (for renters and homeowners). LIHEAP also includes a weatherization component (*LIHEAP Wx*) for activities that increase the energy efficiency, health, and safety of eligible low-income individual's dwellings. The *Weatherization Assistance Program (WAP)* is funded through the Department of Energy (DOE) and assists low-income households by improving the thermal efficiency of housing units through activities such as weather stripping, caulking, and adding of insulation to attics, walls and floors, which leads to reduced fuel costs. Households with young children, elderly or disabled members are prioritized in the WAP.

THDA's THTF provides funding for several home repair or rebuild programs. The *Emergency Repair Program* allocates funds statewide to development districts and/or human resource agencies to help elderly or disabled homeowners make essential home repairs. The *Home Modification and Ramp Program*, also funded through THTF and administered statewide through the United Cerebral Palsy of Middle Tennessee, provides funding to construct ramps and make other home modifications to assist persons with disabilities gain better access to their homes. The *THTF Rebuild & Recover* program provides funds to assist eligible communities recover from a natural disaster. Grants are made to the city or county.

THDA also administers two programs funded through the Department of Treasury's temporary Hardest Hit Fund (HHF) through grants to locally situated sub-recipient partners. The *Tennessee Renovation Loan Program (TRLP)* helps low-income veterans, seniors and homeowners with special needs through loans for repairs or improvement. The *HHF Blight Elimination (BEP) Program* assists with funding the removal of blighted properties in targeted areas within Tennessee.

F. Other Housing Related Initiatives

THDA's THTF supports several special initiatives designed to ensure long-term stability of local affordable housing efforts through capacity building or leveraging of funds. The *Challenge Grant* program provides initial seed funding to support the fundraising efforts of nonprofit organizations related to 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. The *Capacity Building* grant program supports the development and strengthening of the operations, processes and resources that nonprofit organizations need to effectively ensure affordable housing in Tennessee.

G. Governance/Board of Directors

A fifteen-member board of directors governs THDA. The Governor appoints six board members, who are citizens of the state; do not hold public office, and 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. As of June 30, 2020, 14 of the 15 positions were filled, and the board was composed of three (21 percent) minority members and four (29 percent) female members. See Appendix A for detailed information on the members of THDA's Board of Directors, their representation, their committee assignments and their race and gender. Appendix B contains an organization chart of the agency, and a detailed organizational chart of the THDA Executive Team and the reporting structure.

II. RESPONSIBLE OFFICIALS

The Executive Team is comprised of the Executive Director (Department Head), Ralph Perrey, and four Executive Officers. More information regarding THDA, its Board of Directors, program operating policies and organizational structure are located on THDA's website at www.thda.org. Appendix B contains an organizational chart of the THDA Executive Team and the reporting structure. The Executive Director and Title VI Coordinator, 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.

Signatures of 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

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 - is the midpoint of a region's income distribution – half of families in a region earn more than the median and half earn less than the median. Housing programs utilize AMI to identify households eligible to live in income-restricted housing units and to calculate the affordability of housing units to low-income households.
ARRA	Commonly referred to as the Stimulus or The Recovery Act , was an economic stimulus package signed into law on February 17, 2009 to respond to the Great Recession by providing 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) and completed by recipients of formula grant funding.
CDBG	Community Development Block Grant – A HUD formula grant program that provides communities with resources to address a wide range of unique community development needs.
CHAS	Comprehensive Housing Affordability Strategy – A custom tabulation of ACS data on the conditions and characteristics of housing units and households across the United States provided to HUD grantees for planning and analysis.
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 – is a regional or local planning body that coordinates housing and services funding for homeless families and individuals.
COVID-19	Covid-19 is a disease caused by a new strain of coronavirus. 'CO' stands for corona, 'VI' for virus, and 'D' for disease.
CP	Community Programs – A THDA division that administers a variety of housing programs supported through +-, 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 that sets policies regarding energy and safety in handling nuclear material and funds the Weatherization program.
ESG	Emergency Shelter Grant - A HUD formula 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 is a HUD funded program that facilitates access to the supportive services families need to become free of public assistance. The program is offered to recipients of the Housing Choice Voucher (HCV) program for a period not to exceed five years.
Great Choice	Great Choice Home Loan Programs- The Great Choice Mortgage Loan Program offers 30-year, fixed rate mortgages to qualified first-time, repeat and military veteran homebuyers in Tennessee. 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 – HUD funded rental assistance payment, which may be paid on the behalf of an individual tenant through the HUD-funded Housing Choice Voucher Program (HCV) or through a project-based contract through the Section 8 Project Based Rental Assistance program.
HBEI	Homebuyer Education Initiative – THDA’s initiative to create better-prepared first-time homebuyers.
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.
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.
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, PRPLE, ROP	The Hardest Hit Fund Blight Elimination Program assists with the removal of blighted properties in targeted areas within Tennessee through strategic partnerships with approved non-profit agencies. The HHF Principal Reduction with Recast Program or Lien Extinguishment (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. The HHF Reinstatement Only Program (ROP) assists 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. The PRPLE & ROP programs ended in 2019 or 2020.
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.

TN HTF	Tennessee's Housing Trust Fund Program (HTF) is financed by revenue from the mortgage loan proceeds and funds or supports housing-related activities for persons of low and very low income through a number of initiatives.
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.
LIHC	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 below-market interest rates making the homeowners' monthly payments more affordable.
MFTBA	THDA authorizes the allocation of Multifamily Tax-Exempt Bond Authority to local issuers for multifamily developments. A local board or other issuing entity with jurisdiction in the area of the proposed development must issue bonds.
NHTF	The National Housing Trust Fund is a HUD formula grant program that provides funding for the rehabilitation and new construction of rental housing for extremely low income households.
PHA	Public Housing Agency – Any state, county, municipality or other governmental entity or public body, or agency or instrumentality of these entities authorized to engage or assist in the development or operation of low-income housing under the U.S. Housing Act of 1937. PHAs may own and manage public housing properties, administer other HUD programs, such as the HCV program, and own other types of affordable housing.
RP	Research and Planning – THDA's Research and Planning division.
S8CA	Section 8 Contract Administration – A THDA division that monitors compliance with federal regulations through a performance based contract with HUD for properties with a Section 8 Project Based Rental Assistance contract.
S8RA	Section 8 Rental Assistance – A THDA division that administers the Section 8 Housing Choice Voucher, Homeownership Voucher and Family Self Sufficiency programs.

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 governs the activities of all program divisions, sub-recipients and contractors when providing services to the public with THDA funding. The policy states: “THDA is committed to providing equal access to its programs, services, and activities and complies with all applicable federal and state civil rights laws and enabling regulations. THDA does not discriminate on the basis of race, color, national origin, religion, familial status, sex, disability or any other protected class in admission to its programs, services, or activities; in access to them; in the provision of benefits, or in any aspect of operations.” 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.

The policy also provides guidance in regards to contracts between THDA and sub-recipients of THDA’s Federal Financial Assistance. It states, “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. Any sub-recipient or partner who fails to comply with contractual obligations not to discriminate may face loss of funding or other consequences as outlined in the THDA contract.

The authority for THDA to conduct non-discrimination 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. Additionally, the majority of THDA’s programs involve housing activities 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 has authority to conduct compliance monitoring for some federal programs under the Fair Housing Act. Programs with Federal Financial Assistance may be subject to both Title VI and Fair Housing Act compliance monitoring.

THDA, along with its sub-recipients, shall make available any Title VI compliance report to THRC upon request.

V. ORGANIZATION OF THE CIVIL RIGHTS OFFICE

Two THDA staff members are responsible for the oversight of Title VI compliance with one employee primarily responsible for researching and compiling the Title VI Implementation Plan. The two staff members' duties, as they relate to 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 duties relating to Title VI and Fair Housing including the following:

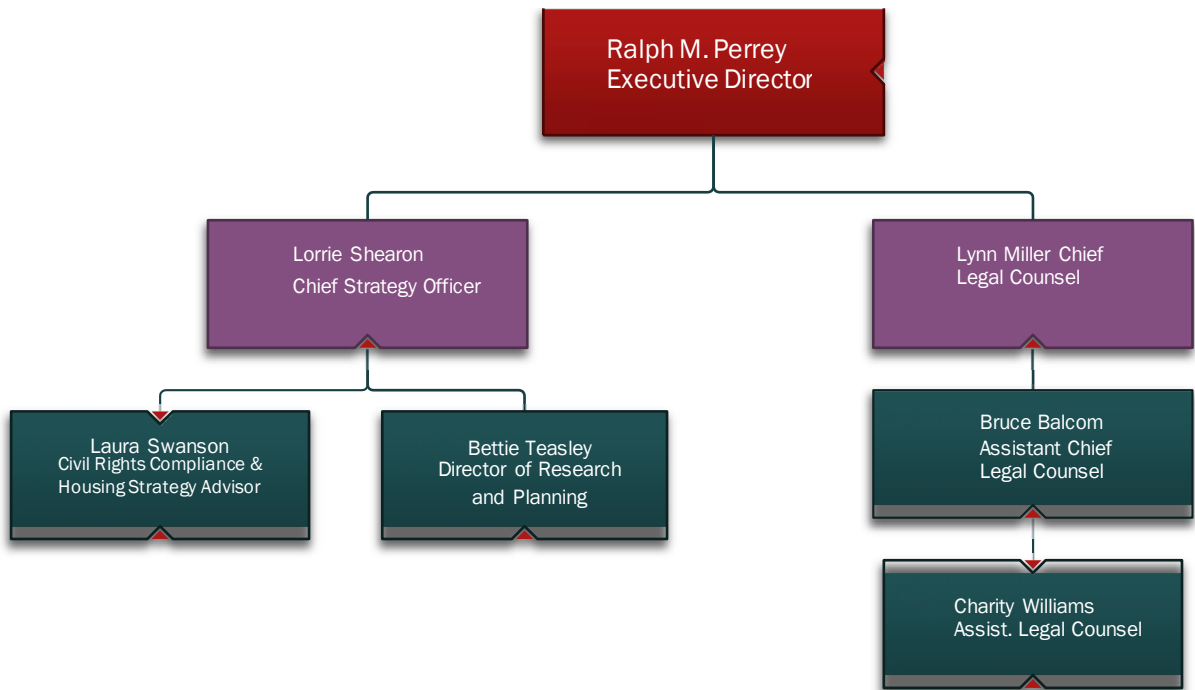
- Review fair housing and civil rights related activities conducted by the staff for compliance and report to program divisions and THDA's Executive team for further implementation of changes in processes and policies.
- Prepare and/or coordinate Title VI and Fair Housing training opportunities for THDA staff on an annual basis.
- Prepare and/or coordinate Title VI and Fair Housing training opportunities for THDA sub-recipients and partner agencies, 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 division of Research and Planning to complete an Analysis of Impediments to Fair Housing Choice and a five-year Fair Housing Action Plan as part of the agency's Consolidated Planning activities and coordinate, track and report the fair housing activities associated with the Consolidated Plan.

Charity Williams, Assistant Legal Counsel for THDA, is responsible for legal services related to Title VI and Fair Housing and is the agency's Section 504 Coordinator. In addition, she serves under the supervision of THDA's Assistant Chief Legal Counsel, as the primary legal counsel for the 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.
- 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.

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

Compliance with non-discrimination laws is integral to the housing activities carried out by THDA as an affordable housing finance agency. While only those programs funded through Federal Financial Assistance are subject to enforcement under Title VI of the Civil Rights Act of 1964, most of THDA's programs and activities are subject to Title VIII of the Civil Rights Act of 1968, also known as the Fair Housing Act. Examples of possible discriminatory practices relating to housing activities are listed 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 of potential discriminatory practices by a THDA employee or sub-recipient include:

Example 1: Housing Choice Voucher Program, THDA direct program administrator

A person with a disability participating in the HCV program may request a reasonable accommodation necessary to allow that person reasonable and equal opportunity to use and enjoy an assisted dwelling unit. If a request for an accommodation were denied without appropriate review or cause, it would represent a possible discriminatory practice.

Example 2: HOME Program (homeowner rehabilitation), THDA grants federal funds to sub-recipient grantee

If several families receive homeownership rehabilitation services from a THDA grantee, all should receive the same quality of rehabilitation regardless of race/ethnicity. If a 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

During FY 2019-2020, \$335,966,743 in Federal financial assistance was available for federal programs administered by THDA. \$12,501,741 of the total Federal financial assistance received in FY 2019-2020 was administrative fee funding, which may be used to pay for equipment, training, resources and other eligible program-related expenses. During FY2019-2020, THDA did not expend Federal financial assistance for equipment, land, loans or federal personnel.

Table 2 details the total Federal Financial Assistance (program funds and administrative fees) available by program and source, along with a description of program activities supported by the federal funding. The funds for the HUD formula grant programs (HOME, ESG, NHTF) represent the portion of a multi-year grant drawn down and expended during FY2019-2020. The funds included for the HHF program were received in a prior fiscal year but available and expended during FYE2020.

Table 2- Program Description & Federal Financial Assistance, FY 2019-2020

Program	Program Description	Source	Federal Funds
<i>Federally Funded Programs; THDA Direct Administrator</i>			
Section 8 Housing Choice Voucher (HCV), includes Mainstream Voucher Program	The HCV program is a rental assistance program where very low-income households receive rental assistance to rent privately owned rental housing that meets quality standards. Qualifying families may also receive a utility assistance payment.	Department of Housing & Urban Development (HUD)	\$46,436,379
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	\$256,423
<i>Federally Funded Programs; Sub-recipient Administrator(s)</i>			
HOME Investment Partnership	The HOME Program supports multi-year housing strategies by local governments, public agencies and non-profits that promote the production, preservation and rehabilitation of single-family housing for low-income households.	HUD	\$8,950,701 * Represents the portion of a multi-year grant expended during this 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	\$2,667,201 * Represents the portion of a multi-year grant expended during this fiscal year.
National Housing Trust Fund (NHTF)	The NHTF program supports local governments, public housing agencies and non-profits to increase and preserve the supply of quality affordable housing for extremely low-income households, including homeless families.	HUD	\$2,405,186 * Represents the portion of a multi-year grant expended during this fiscal year.

Program	Program Description	Source	Federal Funds
Weatherization Assistance Program (WAP)	WAP assists low-income households to reduce their fuel costs while contributing to energy conservation through increased energy efficiency and consumer education.	Department of Energy (DOE)	\$2,377,048
Low Income Home Energy Assistance Program (LIHEAP & LIHEAP Wx)	LIHEAP provides energy assistance to low income households, primarily those who pay a high proportion of their income on home energy. 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)	\$63,784,551
Homebuyer Education (HBEI)	THDA encourages homebuyer education for all homebuyers and requires it for all of the THDA mortgage loan programs. Homebuyer education may be completed online through E Home America or by attending an in-person class through an approved THDA Homebuyer Education counseling agency.	HUD	\$120,923
Tennessee's Hardest Hit Fund: DPA (Down payment Assistance); Blight Elimination (BEP; Principal Reduction Recast Program Lien Extinguishment (PRRPLE) & Reinstatement Only (ROP)	The HHF DPA program provides downpayment assistance in the form of a grant to qualified Great Choice loan participants. The HHF BEP helps fund approved non-profits and land banks to remove blighted properties in targeted areas. The HHF PRRPLE program lowers mortgage payments to affordable levels for homeowners with a financial hardship due to the death of a spouse, divorce, or underemployment. The HHF ROP assists 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.	Treasury	\$6,568,078 *Represents the portion of a prior year temporary stimulus grant expended during this fiscal year.
<i>Federally Funded Programs; Contract Administrator</i>			
Section 8 Project Based Contract Administration	THDA provides oversight and makes housing and utility assistance payments to Tennessee properties with a HUD Project Based Section 8 Housing Assistance Payment Contract.	HUD	\$202,400,253
Total Federal Funds Available¹			\$335,966,743

¹Total federal funds available includes administrative funding provided to cover the expenses, including salaries and benefits, of administering the federal programs.

The programs with Federal Financial Assistance for which dollar amounts may be projected for FY 2020-2021 are presented in Table 3 below.

Table 3- Estimated Federal Financial Assistance, FY 2020-21

Federal Program	FY 2020-2021 Expected Revenue
<i>Ongoing Federal Programs</i>	
Emergency Solutions Grant (ESG)	\$2,768,800
ESG, Cares Act Funding	\$33,587,000
HOME Investment Partnership	\$8,318,300
Homebuyer Education	\$160,712
Housing Choice Voucher/Mainstream/FSS Programs	\$ 49,845,900
Housing Choice Voucher Cares Act Funding	\$10,555,800
Low income Home Energy Assistance Program (LIHEAP)	\$55,797,400
LIHEAP Cares Act Funding	\$18,061,000
Weatherization Assistance Program	\$2,753,200
National Housing Trust Fund	\$2,500,000
Section 8 Project Based Contract Program	\$228,771,400
Total of All Resources Available	\$413,119,512

As of this report, no applications for new allocations of Federal Financial Assistance are pending. A Substantial Amendment for Part II of the ESG Cares Act funding is in process. HUD must receive the Substantial Amendment prior to allocating the funding under Part II. The pending Substantial Amendment represents \$22 million of the \$33,587,000 expected Federal Financial Assistance for the ESG, Cares Act funding.

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 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.

THDA uses extracts of data from the most recent HUD Comprehensive Housing Affordability Strategy (CHAS) dataset to determine the universe of income eligible Tennessee households (those at or below 100 percent Area Median Income). CHAS data are custom tabulations based on the U.S. Census Bureau's 2013-2017 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.

B. Minority Representation of Beneficiaries of THDA 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 not funded through Federal Financial Assistance. 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 assist both low and moderate-income borrowers. The THDA Board sets the income limits for the programs based upon HUD's median family income (MFI). During FYE2020, THDA assisted 299,805 households or individuals³ through all federally funded programs.

When comparing the data for income eligible Tennessee households (CHAS data) by race and ethnicity to the data for race and ethnicity of THDA program beneficiaries, the analysis shows that black and other minority households are equitably served through THDA's federal and non-federal programs. However, while THDA is reaching Hispanic households through our mortgage programs, low-income Hispanic households are underserved in rental assistance programs, home energy assistance, weatherization and repair programs and activities funded through the HOME program. Black households are overrepresented statistically in the rental assistance and home energy assistance programs, most significantly in the HCV rental assistance program.

³ ESG is an emergency shelter program, and reporting is by each sheltered individual, including children, rather than by household. LIHEAP reporting includes all members of every beneficiary household. The number of "households" for the HOME program is represented by the number of housing units completed and ready for occupancy during the fiscal year with funding from multiple grant years.

The disclosure of race and ethnicity information for most programs administered by THDA is voluntary, and thus, underreporting may occur.

Table 4- Demographic Comparison of Potential Eligible Population & THDA Beneficiaries

2013-2017 CHAS Data ¹ for Tennessee Owner Occupied & Renter Occupied Households		Race			Ethnicity
		White, Non-Hispanic	Black, Non-Hispanic	Other, Non-Hispanic	Hispanic
<i>Owner Households earning <30% AMI</i>		78.4%	16.3%	2.7%	2.6%
<i>Renter Households earning <30% AMI</i>		55.8%	34.9%	3.7%	5.6%
<i>Owner Households earning >30% <50% AMI</i>		80.5%	13.7%	2.8%	3.0%
<i>Renter Households earning >30% <50% AMI</i>		60.3%	28.5%	3.0%	8.2%
<i>Owner Households earning >50% <80% AMI</i>		82.7%	12.6%	2.2%	2.5%
<i>Renter Households earning >50% <80% AMI</i>		63.8%	25.9%	3.6%	6.7%
<i>Owner Households earning >80% <100% AMI</i>		83.3%	12.0%	2.3%	2.4%
<i>Renter Households earning >80% <100% AMI</i>		67.1%	23.4%	3.4%	6.2%
<i>Total Owner/Renter Households 100% AMI or less</i>		63.8%	28.3%	3.3%	4.5%
THDA Federal Programs (FYE2020)	Total Beneficiaries	White, Non-Hispanic	Black, Non-Hispanic	Other/ Not Reported	Hispanic
HOME Investment Partnership	135	74.1%	25.9%	0%	<1 %
National Housing Trust Fund ³	0	0%	0%	0%	0%
Emergency Solutions Grant ²	6,160	67.9%	25.5%	6.6%	4.1%
Low Income Energy Assistance ²	257,478	48.5%	46.6%	4.9%	1.9%
Weatherization Assistance	466	62.2%	29.8%	7.9%	2.4%
Housing Choice Voucher rental assistance	6,978	29.8%	69.8%	<1%	2.1%
Section 8 Project Based rental assistance	28,209	54.2%	42.2%	1.2%	2.3%
HHF (Downpayment Assistance) ⁴	369	66.1%	29.8%	4.1%	7.6%
HHF (ROP & PRPLE)	10	83.3%	16.7%	0.0%	0.0%
Total Federal Programs ⁵	299,805	49.2%	46.3%	4.5%	2.0%
Other THDA Programs (FYE2020)	Total Beneficiaries	White, Non-Hispanic	Black, Non-Hispanic	Other/ Not Reported	Hispanic
TN Housing Trust Fund Programs ⁶	351	60.1%	32.8%	7.1%	0%
TN Renovation Loan Program	63	25.4%	74.6%	0%	0%
THDA Great Choice Homeownership	3,571	78.0%	18.0%	4.0%	5.5%
LIHC/MTFBA Programs	57,302	38.8%	50.1%	11.1%	1.0%
Total Other Programs	61,287	41.2%	48.2%	10.6%	1.2%

¹The 2013-2017 CHAS data is the most current data available through HUD's Consolidated Planning system.

²ESG is an emergency shelter program. Reporting is by each sheltered individual, including children, rather than by household. Beneficiary numbers for LIHEAP also include all member of the assisted household and are not by household.

³Grants in the National Housing Trust Fund build/develop housing units; no units were occupied during FYE2020.

⁴All beneficiaries of THDA's HHF Downpayment Assistance Program also participate in the Great Choice Homeownership Program. To reduce duplication, those beneficiaries are excluded from the data under THDA Great Choice Homeownership.

⁵Total beneficiaries may contain duplicates. An individual or household may benefit from more than one of THDA's programs in a fiscal year, which may cause inflation in the totals.

⁶Beneficiary data for the Competitive Grants program was not available. Thus, the THTF programs where beneficiary information is included are the Emergency Repair, Home Modification & Ramps and Habitat programs.

C. Minority Representation of THDA Staff

THDA employed 260 individuals as of June 30, 2020. All staff are classified executive service. Table 5 shows the breakdown of THDA staff by race, ethnicity and gender.

Table 5- Demographics of THDA Staff

Demographics	Number of Staff	Percent of Total Staff
Race (Non-Hispanic or Latino)		
White	151	58.1%
Black/African American	93	35.7%
Other (not specified or two or more)	9	3.5%
Ethnicity		
Hispanic/Latino	7	2.7%
Gender		
Female	189	72.7%
Male	71	27.3%

*Note: The data in the table above is from THDA's Affirmative Action Plan. The Plan includes only the racial reporting categories of White, Black/African American, Asian/Pacific Islander, and Other. Additionally, race information is not collected for persons who are Hispanic or Latino.

IX. Limited English Proficiency (LEP)

A. Policy and Language Access Plan

THDA's policies and procedures for providing meaningful access by persons with Limited English Proficiency (LEP) were updated during 2019 and 2020. THDA's Policy Review Committee approved both an updated LEP policy and a new Language Access Plan in October 2019. A copy of THDA's policy for Providing Meaningful Access to LEP Persons is located in Appendix E and the Language Access Plan in Appendix F.

THDA's LEP policy requires all THDA employees to ensure that LEP persons have meaningful access to apply and if otherwise eligible, participate in the services, activities and programs offered by THDA. Procedures for THDA employees when an LEP encounter occurs include the use of a Language Identification Guide to determine the language spoken, obtaining a qualified interpreter for oral interpretation through AVAZA Language Services and tracking LEP encounters through an online survey. The policy also addresses written translation of vital documents and requires disseminating public notices in languages most commonly spoken in Tennessee other than English.⁴

B. Oral Interpretation

THDA employees follow the procedures outlined in the LEP Policy (Appendix E) when working with an LEP person. THDA conducts internal LEP procedural training on an as needed basis, in particular with public-facing employees. THDA employees are required to connect all LEP persons with a qualified interpreter through our contract with AVAZA language services. Avaza Language Identification Guides ("I Speak Cards") are posted in the lobby or reception area of each of THDA's offices. THDA staff who are proficient in a language other than English may assist LEP persons with limited interpretation activities, such as determining the program/issue for which the LEP person needs assistance or updating phone messages. Staff document LEP encounters through an online fillable survey that details telephone, on-site or written communications. The survey requests the date of the encounter, the type of communication (in person or by phone), the language spoken, referral information (AVAZA, staff member, etc.) and any additional information or notes regarding the encounter.

A list of bi-lingual THDA employees by language spoken is in Appendix G. Avaza Language Services contact information is 5209 Linbar Drive, Suite 603, Nashville, TN 37211, (615) 534-3404.

⁴ The most common languages spoken across Tennessee, other than English are Spanish, Arabic, Chinese, Vietnamese, Korean, Laotian, Kurdish (Behdini & Sorani) and Somali languages.
Tennessee Housing Development Agency
2019-20 Title VI Implementation Plan

C. Written Document Translation

A list of translated documents available in THDA's federal programs is in Appendix H. For federal programs, THDA utilizes translated written resources and materials made available through Federal oversight agencies. HUD provides funding for many of THDA's federally funded programs and has the largest array of translated program documents, which may be accessed at: [hud.gov/program_offices/fair_housing_equal_opp/17lep](https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep). The HUD website provides a range of vital documents in a number of languages such as, brochures, booklets, fact sheets, forms, posters and public service announcements.

Through its Language Access Plan, THDA has identified vital documents in all federal programs. A four-factor analysis shows that Spanish is the most common language spoken, other than English, in THDA's service areas. Vital THDA program documents, where translations are not available through the funding agency, are currently being translated into the Spanish language. A copy of the THDA documents translated into Spanish during FYE2020 is available in Appendix H. Spanish language versions of all vital documents will be available by the end of FY2021. Vital documents not translated into Spanish will include a tagline notice in the languages most commonly spoken in Tennessee other than English notifying recipients of the availability of free language assistance. Vital documents in THDA's loan servicing division, which is not a federally funded program, but has a high number of Spanish language encounters; include a notice of free language assistance in Spanish.

During FY 2019-2020, THDA translated public notices and documents for public comment into Spanish, Arabic, Behdini, Chinese, Korean, Laotian, Somali, Sorani and Vietnamese languages to improve the effectiveness of citizen participation requests. Examples of these notices are in Appendix I. THDA utilizes the Tennessee Language Center (University of Tennessee) and ASTA-USA for written translation of vital documents, not available through federal agencies or other legitimate sources, and for public notices and summaries in federally funded programs.

D. Language Encounters

During FY 2019-20, Spanish was the predominant language group, other than English, encountered by the agency. 419 LEP encounters requiring telephonic interpretation occurred during the fiscal year with 384 (92 percent) involving Spanish language speakers. Individuals speaking Arabic represent the second largest language group in need of interpretation services. Table 6 highlights all of the agency's LEP encounters during FY2019-2020.

Table 6- Telephonic LEP Encounters, FY 2019-20

Month	Spanish	Arabic	Burmese	Somali	Vietnamese	Amharic	Total
July 2019	30	5	-	-	-	-	35
August 2019	49	-	-	-	-	-	49
September 2019	46	1	1	-	-	-	48
October 2019	26	3	-	1	-	-	30
November 2019	35	1	-	-	-	-	36
December 2019	25	4	-	-	1	-	30
January 2019	26	5	-	-	-	-	31
February 2019	25	2	-	1	-	1	29
March 2019	32	3	-	-	-	-	35
April 2019	22	1	-	-	-	-	23
May 2019	28	5	-	-	-	-	33
June 2019	40	-	-	-	-	-	40
Total	384	30	1	2	1	1	419

Source: Avaza Language Line invoices & internal THDA survey.

Sub-recipients of THDA's federal funding are also surveyed for information on LEP encounters through the Non-Discrimination in Services Survey each year. The language group most frequently encountered by THDA sub-recipients was Spanish. Arabic and Mandarin are the next most common languages encountered by THDA sub-recipient agencies.

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. In accordance with the State of Tennessee Citizen Participation Plan, THDA solicits citizen participation using email invitations, newsletters, flyers, and postings to state websites, development district websites, and social media (Facebook and Twitter).

Public notices are announced annually on the Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER), which primarily involve activities for the HUD formula grants programs (ESG, HOME, and the National Housing Trust Fund). In 2019-2020, public notices were also utilized to gather responses to a survey for the Analysis of Impediments to Fair Housing Choice (AI) and to get feedback on the State of Tennessee Consolidated Plan, which also includes the first year Annual Action Plan. Public notices on the public comment period were published in 13 major publications throughout the state. Notices were translated into Spanish, Arabic, Behdini, Chinese, Korean, Laotian, Somali, Sorani and Vietnamese. Copies of all translated public notices from FY2019-2020 are located in Appendix I.

THDA publishes public notices in three Spanish language newspapers, available in West and Middle Tennessee, to promote participation among Spanish speaking persons. The AI survey was available in English and Spanish. THDA also translated the Executive Summary for the 2020-2024 Consolidated Plan and the FY 2019-2020 CAPER into Spanish. Copies of the translations

may be found in Appendix I. All grant and contract notices are placed in major newspapers across the state, including the three Spanish languages papers, and on THDA's website.

THDA maintains a Constant Contact email group that consists of protected class advocates and Spanish speaking organizations and sends the group email blasts about public notices, particularly those for the Consolidated Planning notices. THDA's website is in the process of an update that once completed will include a notice of free language assistance in the languages most commonly spoken in Tennessee other than English on the front screen.

THDA publishes Housing Choice Voucher (HCV) waiting list openings on the website and on TNHousingSearch.org, a free online housing locator funded by THDA. THDA and TNHousingSearch.org website content is convertible to over 100 languages using Google Translator technology. TNHousingSearch.org serves as the THDA HCV landlord listing to assist voucher holders with finding an available unit. It is also available to the public for rental housing searches. THDA rental development programs (LIHC, MTBA, Trust Fund) require THDA-funded properties to list in TNHousingSearch.org. Anyone searching for a unit using TNHousingSearch.org, including THDA's HCV program participants, may search in the language of their choice. TNHousingSearch.org is also supported by a toll free bi-lingual (English/Spanish) call center that is available to the public from 8 am to 7 pm central time, Monday to Friday.

X. COMPLAINT PROCEDURES

A. Written Procedures

THDA provides benefits to the public in a manner that ensures non-discrimination on the basis of race, color, national origin, sex/gender, disability, religion, creed, familial status, 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). THDA requests sub-recipients maintain a complaint log and include information on discrimination complaints in annual reporting to THDA.

All complaints, written or verbal, are 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, which is available on THDA's website. Allegations submitted verbally without a written, signed complaint form are still investigated by the appropriate division at THDA and filed, but are not 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 violate 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. If the complaint alleges a violation of Title VI, the Civil Rights Compliance Advisor will notify the THRC through the THRC notification form
 - iii. The Civil Rights Compliance Advisor will forward the complaint and all relevant documents to THDA's Internal Audit division. 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 alleges a violation of Title VI, the Civil Rights Compliance Advisor will forward a copy of the preliminary report of findings to the THRC.
 2. If the complaint of discrimination is found to be substantiated, THDA's Civil Rights Compliance Advisor will work with THDA's Assistant General Counsel and the program division to make recommendations on appropriate remedial actions based on IA's report of findings and submit recommendations to THDA's Executive Director.
 - 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.

3. 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.
 - iv. If the complaint alleges a Title VI violation, the Civil Rights Compliance Advisor will forward a copy of the final response letter to THRC.
 - v. 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 90 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: If a complaint received involves a program or activity that is outside of THDA's jurisdiction, the Civil Rights Compliance Advisor will forward the complaint to the appropriate jurisdictional agency. Discrimination complaints received from residents of Section 8 project based apartments will be logged in THDA's discrimination complaint log, and then forwarded to HUD FHEO for investigation and response as per THDA's contract with HUD. The complainant is informed of this process at the time a complaint is received.

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 90 days of the date a complaint is filed with the sub-recipient agency.

THDA's Contract with HUD for Contract Administration of the Section 8 project based ("low rent") apartments does not include managing discrimination complaints. Complaints of discrimination for this program are forwarded to HUD Office of Fair Housing and Equal Opportunity (FHEO) for investigation.

B. Complaint Form

A copy of the THDA Discrimination Complaint form is located in Appendix J.

C. Complaints & Lawsuits

During FY 2019-20, THDA received one (1) complaint alleging discrimination on the basis of race, color or national origin when administering THDA federally funded programs or activities. The complaint alleged discriminatory actions based upon race (protected under Title VI) and disability. The claim of discriminatory conduct, which was investigated by THDA Internal Audit, could not be substantiated. The complainant was offered benefits/assistance on the same day as their application. THDA received several additional complaints related to protected classes (disability and religion) under the Fair Housing Act during FY2019-2020. THDA maintains records for both Title VI and Title VIII (Fair Housing Act) complaints, investigations and resolution.

THDA did not have any lawsuits alleging discrimination on the basis of race, color or national origin filed against the agency in FY 2019-2020.

XI. Title VI Training Plan

A. Staff Training

THDA ensures all new employees complete comprehensive online Title VI and Fair Housing training within the first six months of employment. Forty-two (42) new employees (100 percent) completed training in FY2019-2020 during their probationary period. Existing employees who have completed the comprehensive non-discrimination training module complete shorter, update training annually. Due to Covid-19 risks, most THDA employees began working from home in March 2020, and an online non-discrimination training presentation was made available in April 2020. Ninety-nine percent (259 employees) completed the annual non-discrimination training before the end of the fiscal year. Several employees were not able to complete the training due to long-term medical leave. A copy of THDA training materials presented in FY2019-2020, and the new employee quiz is located in Appendix K. All new employees will continue to complete training during their initial probationary period in FYE2021, and annual training for all employees will occur in the fourth quarter of FYE2021.

THDA staff members typically attend or present material at numerous fair housing or non-discrimination training events hosted by external partners or vendors throughout the year. A number of different organizations provide non-discrimination training 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), and the Tennessee Association of Affordable Housing Providers (TAAH).

Most of the Fair Housing training events occur during the spring, and during spring 2020, Covid-19 risks caused almost all organizations to cancel training events. Thus, THDA's participation in external non-discrimination training activities was lower than usual during FYE2020. Table 7 includes examples of training and events with non-discrimination topics presented or attended by THDA staff members. Resources to attend or offer non-discrimination training comes from THDA's training budget, which includes Federal administrative funding.

Table 7- Nondiscrimination Training, FY2019-2020

Event/Host, Location and Date	Number & % of THDA Participants	
Analysis of Impediments to Fair Housing Choice training/consulting activities with ABT Associates, January 2019 to March 2020	6	2.3%
Fair Housing Webinar, Investigating and Responding to Resident Complaints, Angelita E. Fisher Law, May 13, 2020	11	4%
THDA Web based New Employee Non-Discrimination Training (probationary period)	59	100%
THDA Web based Non-Discrimination All Employee Annual Training, April 2020	259	99%

Event/Host, Location and Date	Number & % of THDA Participants	
THDA Web based Homebuyer Education Symposium, Fair Lending Report session by National Community Reinvestment Coalition, July 20, 2020	14	5%

B. Agency Sponsorships of Non-Discrimination Training/Events

THDA regularly sponsors Fair Housing events/training across the state, either through cash donations or through in kind donations of gifts and supplies, to ensure training is available to THDA staff and other housing professionals. Due to closures and restrictions of gatherings associated with Covid-19, all in person Fair Housing events/training across the state, typically held in April, were canceled. Prior to the cancellations, THDA had provided \$650 in funding for sponsorships or events related to non-discrimination activities in the fiscal year. The sponsorship funding will be applied to events in 2021.

C. Sub-recipient Non-Discrimination Training

THDA typically offers a Title VI/Fair Housing update to sub-recipient agencies during grantee training workshops. Training for formula grant sub-recipients includes fair housing basics, fair housing law, how to identify fair housing issues ways to make the public and clients aware of fair housing and ways to affirmatively further fair housing. Grant administrators from organizations throughout the state attend the training. Details on the grantee workshops is located under *Section XII, Sub-recipient Monitoring, Post-Award Procedures*. Table 8 in Section XII provides details on the training workshops, dates and total number of attendees.

Training events for sub-recipient grantees are typically held from January to June. Thus, some training events were canceled or held online in 2020 due to Covid-19 risks. Online training modules covering Title VI and Fair Housing activities are available on THDA's website for sub-recipients and other partner agencies to use as a training resource. THDA reminds sub-recipient grantees periodically of the requirement for non-discrimination training and the need to self-report training activities through the THDA Non-Discrimination in Services Self Survey in 2020 (Appendix L). Eighty-five (85) percent of THDA's sub-recipients of Federal grant funding self-reported that their employees completed Title VI and/or Fair Housing training during FYE2020.

D. Other Training

HUD Section 8 low rent (project based) apartment staff are typically members of SAHMA, as is THDA's project based compliance team. SAHMA provides Fair Housing training opportunities regularly through conferences 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 is accessible to members. During FYE2020, nine THDA

Section 8 Project Based Contract staff attended outside Fair Housing training by vendor Angelita E. Fisher Law.

THDA periodically includes Fair Housing information in developer workshops for LIHC and MFB program developers and on-site managers. LIHC 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). Property management staff for THDA funded properties are reminded of THDA's online non-discrimination training resources annually and encouraged to view or attend THDA or other Fair Housing training.

Homebuyer education providers of THDA's HBEI initiative use the *Realizing the American Dream* manual and deliver training to potential homebuyers 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 and New Start) and is voluntary, but encouraged, for THDA's other loan programs. The cost of homebuyer education used in conjunction with a THDA loan is paid by THDA. During FY 2019-2020, 3,962 homebuyers received HBEI using the *Realizing the American Dream* curriculum. Additionally, THDA included a Fair Lending session in the web based Homebuyer Education Symposium that occurred in July 2020 presented by National Community Reinvestment Coalition. Fourteen (14) THDA staff members and 86 homebuyer education providers of THDA's Homebuyer Education Initiative (HBEI) from across the state attended the Symposium.

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 of the programs are described under Table 2 above. THDA monitors a percentage of these federal program sub-recipients for compliance with Title VI based upon the federal guidance from the governing department (HUD, DOE, DHHS, Treasury, ARC). The monitoring activities for these federal programs are described below in the sections, “Pre and Post Award Procedures”.

THDA also has limited oversight of Project Based Section 8 properties through a performance based Annual Contributions Contract (ACC) with HUD. HUD, not THDA, contracts with the properties to provide housing assistance payments. THDA’s role is to monitor the properties for compliance with the HUD requirements (as per the ACC) including conducting Management Occupancy Reviews (MORs). MORs cover 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.

With the exception of the LIHC awarded through the American Reinvestment and Recovery Act (ARRA) of 2009, the LIHC 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 LIHC properties for required activities under the Fair Housing Act, but does not monitor specifically for Title VI compliance.

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" are noted in Appendix O. 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

Sub-recipients are required to follow the same non-discrimination procedures as THDA once funding is awarded (post-award), and as such, must provide annual non-discrimination training to employees. THDA provides online non-discrimination training modules that sub-recipients may use for training located at: <https://thda.org/about-thda/fair-housing-know-your-rights>. Compliance monitoring for training requirements occurs post-award and not pre-award. THDA collects information from each sub-recipient on training activities through the Non-discrimination in Services Self Survey submitted annually.

3. Contract Compliance Review Prior to Allocation of Payments

Prior to the final allocation of funds for development grants with Federal funding (HOME, NHTF), THDA has procedures to detail inspection, closeout and final payment. All work associated with the grant 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"), before the allocation award or payments are processed.

For example, prior to beginning a HOME project, grant recipients with projects that consist of five or more dwelling units must adopt affirmative marketing procedures and meet HUD affirmative marketing requirements. 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. The affirmative marketing plan is reviewed and 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

Table 8 lists all of the sub-recipient attendees of THDA provided grantee training programs during FYE2020, including the Federal formula grant programs, LIHEAP, WAP and THDA's Single Family Special Programs, which includes some Federally funded activities. Many of THDA's training events for sub-recipients/grantees occur in the spring. Some agencies were unable to attend spring and summer training events in 2020 due to Covid-19 impacts. Two hundred thirty eight (238) individuals, representing 65 percent of the grantee/sub-recipient agencies receiving funding in FY2019-2020, attended THDA training in FY2019-2020.

Table 8 - Sub-Recipient Training, FY2019-2020

Division/Program	Training Description & Date	Attendees
Community Programs/ESG	Application Training, 1/28/2020 (Nashville); 1/29/2020 (Knoxville); 1/31/2020 (Jackson)	81
Community Programs/NHTF	Grantee Workshop, 1/20/2020	3
Community Programs/HOME	HOME/CHDO Grantee Virtual Workshop, 6/24/2020	4
	HOME Homeowner Rehabilitation/DPA Grantee Virtual Workshop, 6/25/2020	21
Community Programs/LIHEAP	LIHEAP Statewide Training , August 1, 2019	51
Community Programs/WAP	Weatherization Annual Statewide Training, August 7 & 8, 2019	41
Community Programs/ Single Family Special Programs	THDA online Non-discrimination in Services training module, June 2020	37
Total		238

THDA currently includes non-discrimination components in THDA provided grantee/sub-recipient training that cover multiple elements of program administration. For example, during the annual HOME/CHDO training workshop, which is typically held annually at the end of January, training includes fair housing basics, 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. HOME/CHDO administrators from throughout the state attend the training.

Each THDA sub-recipient of federal funding is required to provide Title VI and/or Fair Housing training to employees. Online training modules covering Title VI and Fair Housing activities are available on THDA's website for sub-recipients and other partner agencies to use as a training resource (pre- or post-award) (Appendix M). Grantees are also encouraged to have volunteers

view the THDA online non-discrimination training module. THDA collects documentation of staff and volunteer non-discrimination training through a required Non-Discrimination in Services Self-Assessment/Survey submitted annually to THDA during the Title VI monitoring process. Compliance with the Title VI and Fair Housing training requirements also are assessed during required compliance reviews.

The Department of Treasury does not require specific non-discrimination training of sub-recipients of Hardest Hit Funds. However, all sub-recipients are made aware of THDA's online non-discrimination training, including those who provide services supported by THDA's HHF funding.

2. Sub-recipient Compliance Reviews (Monitoring)

After the allocation of funds (post-award), THDA conducts compliance reviews with sub-recipients of THDA's Federal financial assistance in the HUD formula grants programs, LIHEAP and WAP programs and with on-site property managers of the HUD project based Section 8 properties. The reviews vary based upon federal guidance for each program. Each program director determines the frequency and number of compliance reviews conducted annually in accordance with federal regulations and program guidance.

The total number of field (on-site) reviews for FY 2019-20 was 168. Due to Covid-19 impacts, compliance reviews scheduled after March 2020 were conducted remotely, or in the case of the ESG program, canceled. The number of compliance reviews and their corresponding programs are in Table 9.

Table 9- Sub-recipient & Compliance Monitoring Reviews, Federal Programs, FY2019-2020

Program	Reviews
HOME Investment Partnership	4
Low Income Home Energy Assistance Program (LIHEAP)	18 (14 remote)
Emergency Solutions Grant (ESG)	1
Weatherization Program (WAP)/LIHEAP Weatherization	12 (all remote)
Section 8 Management Occupancy Reviews (MOR)	133
Total	168

Each program division maintains a log of each monitoring report by the type of review. THDA does not maintain an annual compliance report; rather, program directors are responsible for ensuring program documents include assurances of nondiscrimination (Title VI & Fair Housing), where applicable. THDA maintains all records pertaining to Title VI Compliance, and forwards annual reports to appropriate state and federal agencies.

a. Compliance Reviews & Monitoring Formula Grant Programs Sub-recipients

THDA Community Programs staff complete a post-award compliance monitoring review for HOME and ESG sub-recipients. A compliance review occurs once the grant completion timeframe is over a year in duration to allow for a full review.

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.

THDA HOME grantees must comply with each of the federal laws, executive orders and regulations detailed in Chapter 6, Section 2.1 of the HOME Operations Manual and the HOME program requirements detailed in the HOME Program Description, which require non-discrimination in services and activities by grantees to affirmatively further fair housing. Activities to further fair housing include distribution of the *Fair Housing Equal Opportunity for All* HUD pamphlet to each program applicant, Section 3 activities and documentation, Equal Opportunity requirements in construction-generated employment, minority and female solicitation, and Section 504 requirements.

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 for compliance with Title VI and FHEO, and an Equal Opportunity/Fair Housing/Title VI checklist is used by program monitors to determine compliance with requirements, responsibilities, activities and recordkeeping. A copy of the HOME Program Evaluation form, including the checklist, and other monitoring forms are in Appendix N.

All 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. Non-discrimination 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. Additionally, grantees are required to give each participant a “Fair Housing for All” brochure. 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: <https://thda.org/business-partners/esg>. A copy of the ESG monitoring form is in Appendix N.

b. LIHEAP and Weatherization Program Sub-recipient Compliance Monitoring 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 LIHEAP and WAP monitoring forms are in Appendix N.

c. Section 8 Project Based Contract Compliance Monitoring 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 Sub-recipient Compliance Monitoring Reviews

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 regularly reviews beneficiary reports to ensure programs are serving all intended beneficiaries, without gaps in service. Where gaps in service to a beneficiary group are found, grantees must plan outreach efforts based on the reporting.

C. Procedures for Non-Compliance

If THDA determines there may be a Title VI violation, a full complaint investigation will be initiated. Written correspondence (letter, email) is 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. THDA does not have enforcement authority. If a violation is reported, any enforcement and/or punitive decisions are made by the appropriate state or federal agency. 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, and HHF programs. All programs with Federal financial assistance are described above under Table 2. As of this report, no applications for new allocations of Federal Financial Assistance are pending. A Substantial Amendment for Part II of the ESG Cares Act funding is in process. HUD must receive the Substantial Amendment prior to allocating the funding under Part II. The pending Substantial Amendment represents \$22 million of the \$33,587,000 expected Federal Financial Assistance for the ESG, Cares Act funding.

THDA provided grants to 102 sub-recipients using Federal financial assistance during FY2019-2020, and 27 of the sub-recipients were new to the grant program or activity. A detailed list of all of THDA's FY2019-2020 sub-recipients and vendors, 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 O. New sub-recipients are listed in Appendix P.

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 non-profit 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. The COC sub-contractor map may be viewed on the THDA website: <https://thda.maps.arcgis.com/apps/MapSeries/index.html?appid=185d64f2079143dfb61067d5ce62e4aa>. 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 viewed on the THDA website: <https://thda.maps.arcgis.com/apps/MapSeries/index.html?appid=d8eaf5603bc14aafa699d08c4d317e8d>. For HHF BEP, THDA works in partnership with approved non-profit agencies and land banks in targeted areas.

2. Vendors

THDA also enters into contracts with vendors to support program activities. THDA entered into contracts with 39 new vendors in FY2019-2020. Table 10 details Minority/Women's Business Enterprise (M/WBE) vendor statistics and shows that 5.6% percent of THDA's vendors in FY2019-2020 were certified as minority and/or women business enterprises. Detailed information on all vendors and sub-recipients is located in Appendix O. New vendors are listed in Appendix P.

Table 10- Minority/Women's Business Enterprise (M/WBE) Vendor Statistics

Total Number of Vendors	90
Number of M/WBE Vendors	5
Percentage M/WBE Vendors	5.6%
Total Contract Expenditures Awarded to M/WBE Vendors	\$3,405,300
Percentage of All Contract Expenditures Awarded to M/WBE Vendors	11.6%

Note: The total number of contracts with minority and women owned businesses may be underreported. Vendors secured through the Request for Proposal (RFP) process and through non-RFP methods (for contracts less than \$50,000), or that are sole-source, are 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/fair-housing-know-your-rights/title-vi-compliance>

2. Program Information Dissemination

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

- THDA website (www.thda.org)
- Social media (Facebook & Twitter)
- Newsletters
- TNHousingSearch.org
- Advertisements- online and print
- News releases
- Industry meetings
- Public meetings
- Training Activities (sub-recipients; housing industry and special interest groups)
- Email blast lists
- Public notification through newspapers
- Radio and television interviews about THDA programs
- Public service announcements
- Public speaking engagements

THDA presents civil rights, non-discrimination and fair housing information through the following means:

- Workshops and training for staff, sub-recipients, partner agencies and program participants
- THDA's Title VI and Fair Housing webpages of the THDA website (<https://thda.org/about-thda/fair-housing-know-your-rights>)
- Display of nondiscrimination posters in THDA offices (English and Spanish)
- HUD Title VI, Fair Housing and LEP resources and materials
- Fair Housing Booklets from HUD, such as *Fair Housing & Equal Opportunity for All* or *Fair Housing- It's Your Right*, distributed to beneficiaries (English & Spanish versions).
- Program policies & manuals
- 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 non-discrimination laws and regulations, examples of discrimination, non-discrimination resources and the methods for filing a discrimination complaint (under Fair Housing or Title VI). In addition, a copy of the Title VI Implementation Plan is posted on the website and is accessible to the public. The Fair Housing and Title VI webpages may be accessed at <https://thda.org/about-thda/fair-housing-know-your-rights>.

3. Complaint Information Dissemination

THDA's Complaint Procedures are available on the website at: <https://thda.org/about-thda/fair-housing-know-your-rights/title-vi-compliance>

4. 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. Recipients of THDA's HUD funds must complete an affirmative marketing plan. 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: https://www.hud.gov/sites/documents/FHEO_BOOKLET_ENG.PDF. THDA requires ESG grantees to provide the Fair Housing – It's Your Right! Pamphlet to all beneficiaries: https://www.hud.gov/sites/documents/DOC_12150.PDF. THDA also requires all grantees to use the Fair Housing logo on program materials and to display FHEO posters in their public offices.

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. In areas where more than 5 percent of the population speaks a language other than English and where there is a high percentage of LEP persons, THDA recommends conducting outreach in those languages and to organizations who serve the LEP population in the service area.

3. Minority Participation – Planning/Advisory Boards

Information regarding advisory board members, including how members are selected and a link to the published list of members in FY2019-2020, is in *Public Notice & Outreach, Section B, Boards and Advisory Boards* below, and in Table 11 in the same section.

B. Boards & Advisory Bodies

A fifteen-member board of directors appointed by the Governor oversee THDA's operations. As of June 30, 2020, 14 of the 15 positions were filled, and the board was composed of three (21 percent) minority members and four (29 percent) female members. Detailed information on the members of THDA's Board of Directors, their representation, their committee assignments and their race and gender is located in the Overview of this Plan and in Appendix A.

THDA currently has three advisory boards (see Table 11). Advisory board members are not appointed, but rather, THDA staff with leadership for the programs relevant to the particular industry or board, invite individuals to serve on each advisory 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 THDA's Advisory Boards do not directly influence agency policy, the 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 to enhance the quality of life to all Tennesseans, with a focus on low- to moderate-income persons.

The Housing Industry Advisory Board had 16 members as of June 30, 2020. 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 9 to 10 members working as housing and financial educators that serve to advise THDA in promoting sustainable housing choices and building strong communities.

Table 11- 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	https://thda.org/about-thda/advisory-boards/energy-efficiency-and-weatherization	1-Af. Am	7%	29%	14
Housing Education Advisory Board	Yes	https://thda.org/about-thda/advisory-boards/housing-education	3-Af. Am	33%	78%	9
Housing Industry Advisory Board	Yes	https://thda.org/about-thda/advisory-boards/housing-industry	1-Af. Am 1-Hispanic	13%	56%	16

C. Minority Input & Bidding Opportunities

1. Minority Input Opportunities

- a. In FY2019-2020, 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. The State of Tennessee 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://thda.org/pdf/Updated-Citizen-Participation-Plan-per-09_2014-Sub-Amendment.pdf

In accordance with the Citizen Participation Plan, THDA solicits citizen participation using email invitations, newsletters, flyers, and postings to state websites, development district websites, and social media (Facebook and Twitter). Public notices are placed in major publications throughout the state and in targeted minority newspapers where available, as well as on THDA's website. Public notices and documents soliciting public comment are provided in English and Spanish versions on THDA's website. Notices informing the public of a comment period or a public meeting for formula grant programs are also published in English and Spanish and may be translated into other languages most commonly spoken in Tennessee, such as Arabic, Behdini, Chinese, Korean, Laotian, Somali, Sorani and Vietnamese.

THDA maintains a Constant Contact email group for protected class advocates and Spanish speaking organizations for email blasts about public notices, particularly those for the Consolidated Planning documents. The Constant Contact lists were created to ensure organizations that serve a protected class are specifically notified on public comment periods.

- b. THDA's Industry and Government Affairs (IGA) team continued outreach efforts across the state in FY2019-20 with one outreach liaison for each grand division. Each outreach 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, and Conexion Americas 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 has been engaged in planning with the Mortgage Bankers Association in Convergence Memphis with a focus on consumer and industry awareness, accessibility and support for housing services in Shelby County at large and specifically three predominately minority communities in need.

THDA's Real Estate Liaison is 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. A Customer Account Manager in the division presented a session at the Memphis Mortgage Bankers Association on Diversity and Inclusion.

2. Grants and Bids Process

The THDA Operations Division oversees agency contracts with vendors and utilizes the State's Diversity Business Certified Directory (<https://tn.diversitysoftware.com/FrontEnd/SearchCertifiedDirectory.asp?XID=7152&TN=tn>) to assist in the search for qualified minority and women owned businesses. 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 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.

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 that apply to sub-recipients of THDA funding 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, 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 and NHTF grantees receive information regarding the affirmative steps to ensure that women and minority owned businesses are afforded opportunities to bid on service, material, and construction contracts. During monitoring, THDA checks for the Equal Opportunity poster and for solicitation of minority and female contractors within in the county and in the surrounding counties. Each administrator must complete HUD Form-2516, Contractor/Subcontractor Activity form, annually, which includes information on contracts with businesses identified as M/WBE. HOME and NHTF grantees reported entering into contracts with 24 women or minority owned businesses during the most recent Federal reporting period.

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) requires 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 accessing the statewide Diversity Business Enterprise Directory. The link is also posted on THDA's website on the program information page.

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, National Housing Trust Fund, 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
- NHTF: 24 CFR Parts 91 and 93, Interim Rule
- ESG: 24 CFR 576
- 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 Low-Income Housing Tax Credit (LIHTC) Program, Hardest Hit Fund (HHF) and the Homeownership Programs under the following governing legislation for each program:

- 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.
- HHF: Section 109 of the Emergency Economic Stabilization Act (ESSA), Division A of Pub. L. 110-343, 112 Stat. 3774 (2008)
- 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 2019-2020.

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 FY2019-20 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, including an annual non-discrimination self-survey and through monitoring of THDA programs. More information on the monitoring of sub-recipients is in *Section XII, Sub-recipient Monitoring*. THDA evaluates the performance of sub-recipients through annual compliance monitoring. THDA did not report any Title VI or Fair Housing deficiencies during the compliance monitoring process in FY2019-2020.

B. Consolidated Planning

1. Consolidated Plan

The Consolidated Plan combines the planning, application, and reporting processes for all of the 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. 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 latest Consolidated Plan covers 2020-2024, and is posted here: https://thda.org/pdf/RP_2020-ConPlan_Final_Updated.pdf.

2. Annual Action Plan

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/Full-AAP-with-appendix-2019.pdf>).

3. CAPER

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://thda.org/pdf/RP_18-19-CAPER-FINAL_with-updated-appendix.pdf. THDA provides periodic updates on progress as requested by FHEO.

4. Analysis of Impediments (AI) to Fair Housing Choice

The Analysis of Impediments to Fair Housing Choice is a review of impediments or barriers that may affect fair housing choice by persons in a protected class. 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/gender, disability, familial status, national origin, or creed.

The Consolidated Partners (THDA, ECD, DOH) use the findings of the AI for five years to serve as a priority list for addressing impediments to fair housing choice, and affirmatively furthering fair housing. THDA led the planning for an updated statewide AI with the Consolidated Partners during 2019 and 2020. The process involved a range of research and planning activities, including: Consulting from Abt Associates through a grant from HUD; a consumer level fair housing survey (in English and Spanish); statewide focus group discussions with development districts, local governments, the disability community, black and Latino realtors, and local stakeholders to receive feedback about barriers to fair and affordable housing choices; analysis of racial and/or ethnic segregation in the state and other factors that might affect fair housing choice through PolicyMap and other resources.

Over the past few years, HUD has issued guidance that substantially changes the methods agencies use when completing an AI. HUD terminated the most recent guidance for Affirmatively Furthering Fair Housing published in 2015 and replaced it with a new rule, *Preserving Community and Neighborhood Choice* in July 2020 that substantially amends the prior guidance. The changes in rulemaking have delayed the Consolidated Planning partners' completion of an AI. However, a statewide Fair Housing Action Plan (2020-2024) based upon

conclusions drawn from the 2019-2020 AI research and planning was finalized in FYE2020 as part of the 2020-2024 Consolidated Plan.

5. Fair Housing Action Plan

As part of the Consolidated Planning process, THDA develops a Fair Housing Action Plan, which is the strategy proposed to address or minimize the identified barriers to fair housing choice in the service area (state of Tennessee). The most recent Fair Housing Action Plan is published on the THDA website with the 2020-2024 Consolidated Plan (https://thda.org/pdf/RP_2020-ConPlan_Final_Updated.pdf).

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 2018-2019 may be viewed on the THDA website (https://thda.org/pdf/2019-HOME-Beneficiary-Report_FINAL.pdf).

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. The Plans may be found on the THDA website at <https://thda.org/help-for-renters-section-8/housing-choice-voucher-program/hcv-administrative-plans-policy-and-rules>.

E. Additional Activities/Deficiencies

THDA has no additional activities or deficiencies to report for FY 2019-2020.

XIV. Appendices A-O

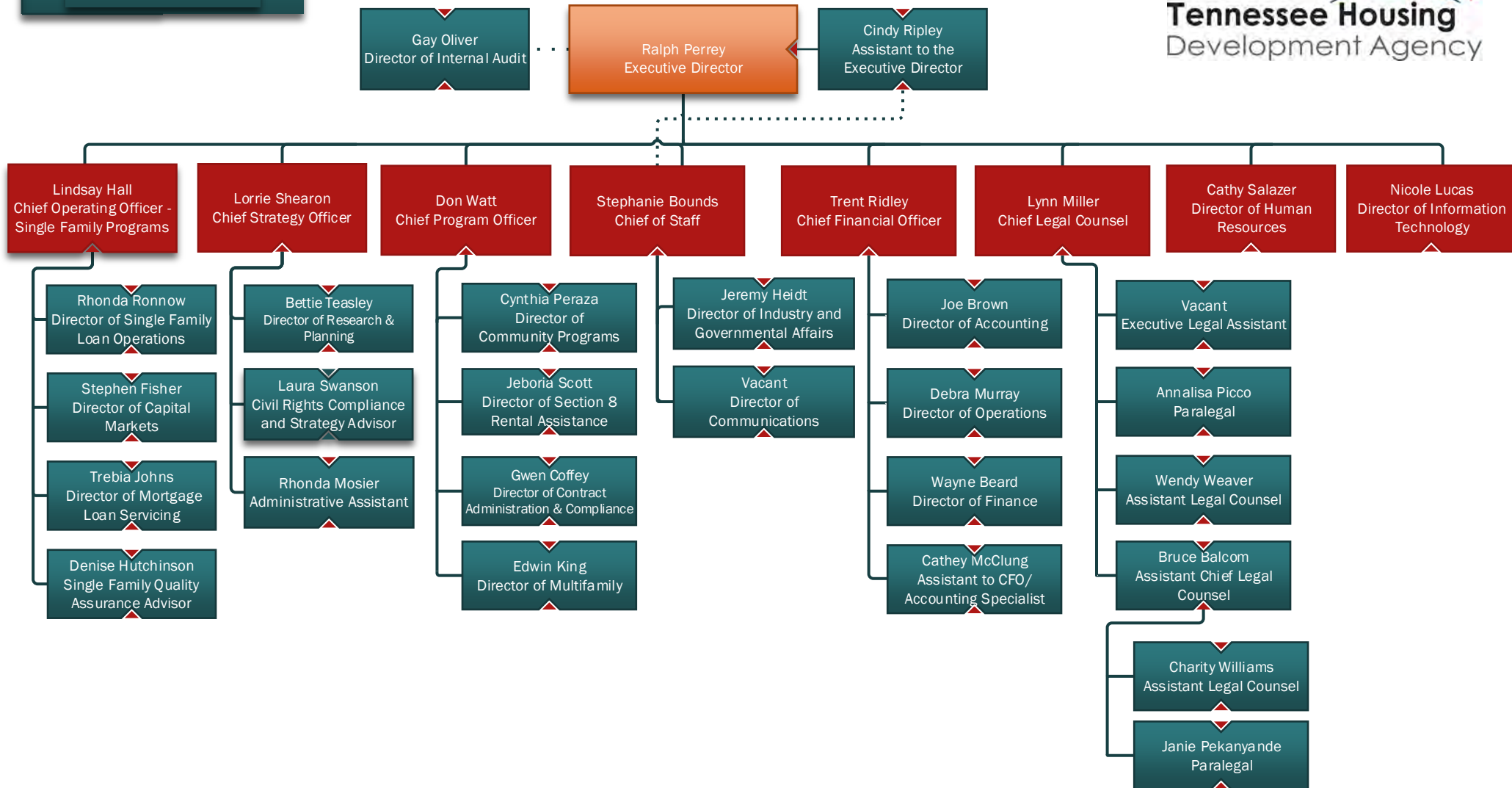
THDA Board of Directors as of 06/30/2020

Board Member	Term	Representation/ Appointed By/ Committees Served	County of Residence Race/Gender/60+ Age as 6/30/20
THDA CHAIR Michael L. Hedges 1033 Trent Place Pleasant View, TN 37146 (615) 746-2614 mhedges@bellsouth.net	First Term: 7/1/2019- 6/30/2023 Appointed Chairman on 07/19/19	Homebuilding Representative Appointed by: Governor Committee(s): Board of Directors	Cheatham White Male Yes
Dorothy L. Cleaves SunTrust Bank Mail Code TN-MEM-7030 999 S. Shady Grove Road, #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 Representative Appointed by: Governor Committee(s): Audit & Budget, Lending (Chair)	Shelby African American Female Yes
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 Representative Appointed by: Governor Committee(s): Lending, Rental Assistance	Shelby African American Female Yes
John Krenson Operation Stand Down 1125 12 th Avenue South Nashville, TN 37203 (615) 248-1981 john@osdn.org	First Term: 10/3/18-6/30/20 Second Term: 7/1/2020-6/30/24	Not for Profit Corporation Representative Appointed by: Governor Committee(s): Grants, Lending & Rental Assistance	Franklin White Male No
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 Second Term: 7/01/19-6/30/23	Speaker of the House Appointee (Harwell) Committee(s): Audit & Budget, Grants	Davidson White Male No
Rick Neal Pinnacle Financial Partners 6525 Quail Hollow Road, #510 Memphis, TN 38120 (901) 207-8225 Rick.neal@pnfp.com	First Term: 8/22/19-6/30/23	Governor Appointee (Lee) Committee(s): Grants	Shelby White Male No

Christine C. Rhea Mortgage Investors Group 8320 East Walker Springs Lane Knoxville, TN 37923 (865) 770-3100 Chrissi.rhea@migonline.com	First Term: 7/1/19-6/30/23	Speaker of the Senate Appointee (McNally) Committee: Audit & Budget Lending	Knox White Female Yes
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 Second Term: 7/1/19-6/30/23	Local Public Housing Authority (Governor) Committee: Rental Assistance (Chair)	Campbell White Male No
Lynn Tully Tenn Division of ECD 225 West Center Street Kingsport, TN 37660 Tel: (423) 431-9650 lynn.tully@tn.gov	First Term: 7/1/16-6/30/20	Local Government (Governor) Committee: Grants Tax Credits (Chair)	Sullivan Asian/White Female No
Joseph Williams Deputy Counsel to Gov Bill Lee State Capitol, Office of the Governor 600 Charlotte Avenue, Suite G-10 Nashville, TN 37243 Tel: 615-734-8381 joseph.williams@tn.gov	Ex-Officio	Governor's Representative (Governor) as of 06/12/2020 Committee: Lending Tax Credit Rental Assistance	Davidson White Male No
Butch Eley Commissioner Finance & Administration 600 Charlotte Avenue State Capitol, First Floor Nashville, TN 37243-0285 Tel: 615-741-2401 butch.eley@tn.gov	Ex-Officio	Commissioner of F & A Rep: Colleen Daniels TN Tower, 18 th Floor 312 Rosa L. Parks Ave. Nashville, TN 37243 (615) 313-5818 Colleen.Daniels@tn.gov Committees: Bond Finance Lending Tax Credits	Unknown* White Male Unknown* *Not able to obtain information after numerous requests

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: Jonathan Rummel Committees: Audit & Budget Bond Finance Grants	Sumner White Male No
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: 01/2019-01/2021	State Officer Rep: Kevin Bradley Committees: Audit & Budget Bond Finance Tax Credits	Fayette White Male Yes
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: 01/2019-01/2021	State Officer Reps: Katie Armstrong Jason Mumpower Committees: Bond Finance Grants	Davidson White Male Yes

Executive



Tennessee Housing Development Agency (THDA)

NON-DISCRIMINATION IN THE ADMINISTRATION OF PROGRAMS, SERVICES AND ACTIVITIES

Purpose: To ensure no qualified individual will be excluded from participation in, or the benefits of, the programs or activities administered by THDA solely on the basis of race, color, religion, creed, national origin, sex, familial status, age, disability and any other class protected under state or federal law.

Effective Date: July 1, 2019

Application: This policy applies to all programs, services or activities administered by THDA.

Policy Statement: THDA is committed to providing equal access to its programs, services, and activities and complies with all applicable Federal and state civil rights laws and enabling regulations. THDA does not discriminate on the basis of race, color, national origin, familial status, age, sex, disability or any other protected class in admission to its programs, services, or activities; in access to them; in the provision of benefits, or in any aspect of operations.

Responsibility: Each THDA employee is responsible for exhibiting and promoting professional and respectful conduct in the work place. Each THDA employee will be held accountable for personal conduct that is determined to be in violation of this policy.

Every THDA employee shall report suspected discriminatory conduct in the provision of services or program activities by either a THDA employee or sub-recipient/grantee to the Civil Rights Compliance Advisor, the Office of Legal Counsel, the Division of Internal Audit or a member of leadership. The Civil Rights Compliance Advisor tracks and coordinates discrimination complaints. The Division of Internal Audit conducts internal investigations into allegations of discrimination under this policy. In some cases, a complaint of discrimination may be investigated by the Tennessee Human Rights Commission (THRC). In those cases, the Civil Rights Compliance Advisor will coordinate internal actions with the THRC, THDA Internal Audit Division and the Office of Legal Counsel.

The Executive Director oversees any actions related to THDA employee conduct under this policy except those related to either himself/herself or to the Director of Internal Audit. If a complaint is lodged against the Executive Director or the Director of Internal Audit, then the THDA Board's Audit and Budget Committee is responsible for follow-up.

Employee Non-Discrimination Training: All THDA employees complete annual non-discrimination training. Annual training may focus on a specific non-discrimination topic of particular relevance to THDA's programs and activities or may be a short, general refresher on the overall requirements of non-discrimination laws. New THDA employees complete a comprehensive non-discrimination training module within the first six months of employment.

Discrimination Complaint Policy: Any applicant to, or beneficiary of, a THDA funded program who alleges discrimination based upon race, color, religion, creed, national origin, sex, familial status, age, disability or any other protected class has the right to file a complaint no later than 180 days after the alleged discrimination. The complaint procedures may be found in THDA's *Grievance Procedures for Complaints of Discrimination by Applicants or Beneficiaries* of THDA's Programs. Applicants to and beneficiaries of THDA programs are notified of their right to file a discrimination complaint. The procedures to file a complaint and a Discrimination Complaint form are made publicly available on the Fair Housing page of the THDA website.

Non-Discrimination Related to Persons with Disabilities & Reasonable Accommodation: Federal and state non-discrimination laws provide housing protections for individuals with disabilities. In accordance with these laws, THDA will not exclude any qualified individual with a disability, solely on the basis of the disability, from participation in or the benefits of the federally funded programs or activities administered by THDA.

Definition of Disability (with respect to an individual): A physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment. The term major life activity may include, seeing, hearing, walking, breathing, performing manual tasks, caring for one's self, learning, speaking, or working (not an exhaustive list).

Under Section 504 of the Rehabilitation Act of 1973, organizations with 15 or more employees must designate a Section 504 Coordinator and notify program participants and employees of non-discrimination policies, including information on how to request a Reasonable Accommodation of rules, policies, practices or services and grievance procedures. THDA's Section 504 Coordinator is an Assistant Legal Counsel appointed by THDA's Executive Director. THDA's non-discrimination and grievance procedures and contact information are posted to the Fair Housing page on the THDA website.

Reasonable Accommodation: Title II (Subtitle A) of the Americans with Disabilities Act, Section 504 and the Fair Housing Act provide individuals with disabilities the right to request a reasonable accommodation in the rules, policies, practices, or services of a housing provider (or state/local government). A reasonable accommodation is a change, adaptation, or modification to a policy, program, service, or workplace which will allow a qualified person with a disability to participate fully in a program, take advantage of a service, or perform a job. THDA will provide reasonable accommodation to all applicants to and participants of programs administered by the agency. THDA's Section 504 Coordinator oversees reasonable accommodation requests for the agency.

Guidance from the Department of Housing and Urban Development (HUD) and the Department of Justice states that if a person's disability is obvious or otherwise known to the provider, and the need for the requested accommodation is also readily apparent or known, then additional information about the requester's disability or the disability-related need for the accommodation is not necessary. If the requestor's disability is known or readily apparent to THDA but the need for the accommodation is not readily apparent or known, THDA will request only information that is necessary to evaluate the disability-related need for the accommodation. During the

process of evaluating a request for reasonable accommodation, THDA will not make an inquiry to determine whether an individual has a disability; or an inquiry as to the nature or severity of an individual's disability. Rather, THDA may request documentation to confirm any disability-related need(s) for a requested reasonable accommodation(s). THDA will not require the individual to disclose the specific disability (ies); or the nature or extent of the individual's disability (ies).

THDA will generally, upon request, provide appropriate aids and services leading to effective communication for qualified individuals with disabilities so that they may participate equally in THDA's programs, services and activities. This includes qualified sign language interpreters (including video remote interpreting) and written information in other formats (large print, audio, accessible electronic formats, and other formats).

Limited English Proficiency & National Origin Protections: Title VI of the Civil Rights Act of 1964, the Fair Housing Act (national origin protections) and Executive Order 13166 require recipients (and sub-recipients) of Federal financial assistance to take reasonable steps to ensure meaningful access to programs and services by Limited English Proficient (LEP) persons. LEP Persons are defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English.

As per guidance from federal funding agencies such as the Department of Justice (DOJ), the Department of Housing and Urban Development (HUD) and the Department of Health and Human Services (DHHS), THDA has completed a four factor analysis and a Language Access Implementation Plan that outlines how LEP persons are notified of language services and when and how language services are provided to LEP persons. The four factor analysis and THDA's Language Assistance Implementation Plan are available for public review on the THDA website. The analysis and Plan are periodically reviewed and updated as needed.

Title VI Coordinator, Plan & Compliance (*State of Tennessee Public Acts, 2009 Public Chapter No. 437*):

Recipients (and sub-recipients) of Federal funding must appoint a Title VI Coordinator who is responsible for managing and monitoring Title VI complaints, Title VI compliance, and providing the annually required Title VI Implementation Plan to the Tennessee Human Rights Commission (THRC) each year. The Civil Rights Compliance Advisor serves as the agency's Title VI Coordinator and oversees non-discrimination training activities, complaints, sub-recipient self survey reporting and the Title VI Plan activities and submission.

THDA completes a Title VI Implementation Plan annually that details Federal programs and related expenditures, including beneficiary demographics, and non-discrimination activities, training, compliance, complaints and assurances. The Plan is submitted to THRC on or before September 30 each year. Once approved by the THRC, THDA's Title VI Implementation Plan is posted to the THDA website.

Consolidated Plan (HUD Block Grant Programs), Public Housing Authority (PHA) and Fair Housing Activities (*24 CFR Part 91, Subpart D*): The Consolidated Plan Block Grant Programs consist of five HUD funded programs: HOME Investment Partnership (HOME),

Emergency Solutions Grant (ESG), the National Housing Trust Fund, Community Development Block Grant Program (CDBG) and Housing Opportunities for Persons with Aids (HOPWA). THDA is the state administrator for the HOME, ESG and the NHTF Programs. Department of Economic and Community Development (ECD) oversees the CDBG program, and the Department of Health administers HOPWA. THDA serves as the lead state agency for Consolidated Planning working in cooperation with ECD and Health.

The Plan serves as a guide in helping the state meet affordable housing, community development, economic development, public service, and fair housing needs over the next five years. 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 Consolidated Plan and Annual Action Plan, along with the Consolidated Annual Performance and Evaluation Report (CAPER), which reports on accomplishments and progress toward Consolidated Plan goals, and the Citizen Participation Plan, are posted for public review on THDA's website.

As part of the Consolidated Plan, THDA must certify that the agency will affirmatively further fair housing (24 CFR Part 91.325 (a)(1)), which means conducting an Analysis of Impediments to Fair Housing Choice (AI), taking appropriate actions to overcome the effects of any impediments identified through that analysis, and keeping records of these actions. THDA completes an Analysis of Impediments (AI) to Fair Housing Choice every five (5) years in cooperation with the other state Consolidated Plan agencies. The AI is a review of impediments to fair housing choice in the public and private sector. THDA annually reviews the Action Plan and updates activities undertaken to overcome impediments to Fair Housing Choice. The Analysis of Impediments and Action Plan are posted to THDA's website.

THDA also completes a PHA Plan to describe its Housing Choice Voucher Program policies, programs, operations, and strategies for meeting local housing needs and goals. There are two parts to the PHA Plan: the Annual Plan and the 5-Year Plan. The goals and local housing needs identified in the PHA Plan must be consistent with the Consolidated Plan. The PHA Plans are posted to the THDA website on the Rental Assistance page for public review.

THDA Contracts (Sub-recipients & Vendors) and Non-Discrimination Assurance

Language: Every THDA contract includes non-discrimination assurance language that establishes an affirmative obligation to not discriminate against any individual on the basis of that individual's membership in a protected class listed in this policy. Activities funded through Federal financial assistance from the Department of Housing and Urban Development include the HUD non-discrimination assurance language.

Sub-Recipients of THDA Federal Funds & Non-Discrimination: Sub-recipients of THDA's federal funding must comply with all federal and state non-discrimination laws in the same manner as THDA (the primary recipient). THDA provides online non-discrimination training resources for sub-recipient and partner agencies. THDA will review compliance with Fair Housing, Title VI, Section 504 and other applicable non-discrimination regulations during monitoring activities for sub-recipients of THDA's federal funds.

Federal Non-Discrimination References:

1. *Title VI of the Civil Rights Act of 1964 (42 U.S. Code § 2000d)* prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal financial assistance.
2. *Title VIII of the Civil Rights Act of 1968, "The Fair Housing Act", (42 U.S. Code §§ 3601-19)* as amended in 1988, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, on the basis of race, color, national origin, religion, sex, familial status or disability. The Fair Housing Act also requires landlords to allow tenants with disabilities to make reasonable access-related modifications to their private living space, as well as to common use spaces. The Act further requires that new multifamily housing with four or more units be designed and built to allow access for persons with disabilities. The Fair Housing Act applies to all housing activities and dwellings, except as exempted (*42 U.S. Code 3603 § 803 §§ b & c; 42 USC 3607 § 807 §§ a & b*).

Enabling regulations: Department of Housing and Urban Development (HUD), 24 CFR §100 and 24 CFR §§ 5.150 – 5.168 (obligation to affirmatively further fair housing)

3. *Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794)* states that no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under any program or activity that receives Federal financial assistance. Programs and activities must be readily accessible to and usable by persons with disabilities.

Enabling regulations:

- HUD 24 CFR. § 8- Non-discrimination based on Handicap in Federally Assisted Programs and Activities of HUD
 - Department of Health and Human Services (HHS) 45 CFR § 84- Non-discrimination based on Handicap in Programs or Activities Receiving Federal Financial Assistance
 - Department of Energy (DOE) 10 CFR. § 1040- Non-discrimination in Federally Assisted Programs or Activities
 - Department of Treasury 31 CFR § 40- Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance From the Department of the Treasury
4. *Title II of the Americans with Disabilities Act of 1990 (42 U.S. Code §§ 12131 – 12165)* (Subtitle A) protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments. Title II requires public entities to make reasonable modifications to policies, practices, and procedures where necessary to avoid discrimination, unless the entity can demonstrate that doing so would fundamentally alter the nature of the service, program, or activity being provided, including communicating effectively with people who have hearing, vision, or speech disabilities. HUD enforces Title II with respect to housing-related programs and

activities of public entities, including public housing, housing assistance and housing referrals.

Enabling Regulations:

- DOJ 28 CFR § 35 - Nondiscrimination on the Basis of Disability in State and Local Government Services
- HUD 24 CFR § 570.614 - Architectural Barriers Act and the Americans with Disabilities Act

5. The *Architectural Barriers Act (ABA)* (42 U.S.C. 4151-4157) requires that buildings and facilities that are designed, constructed, or altered with Federal funds, or leased by a Federal agency, comply with Federal standards for physical accessibility.

Enabling Regulations: 24 CFR § 570.614 - Architectural Barriers Act and the Americans with Disabilities Act

6. *Age Discrimination Act of 1975* (42 U.S. Code §6101-6107), as amended, provides that no person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Enabling Regulations:

- HUD 24 C.F.R. § 146 - Nondiscrimination on the Basis of Age in Programs or Activities Receiving Federal Financial Assistance
- HHS 45 CFR § 91 - Nondiscrimination on the Basis of Age in programs or Activities Receiving Federal Financial Assistance from HHS
- DOE 10 C.F.R. § 1040- Non-discrimination in Federally Assisted Programs or Activities
- Treasury 31 CFR § 23- Nondiscrimination on the Basis of Age in Programs and Activities Receiving Federal Financial Assistance from the Department of Treasury

7. *Section 109 of Title I of the Housing and Community Development Act of 1974* (42 U.S. Code § 5309) prohibits discrimination on the basis of race, color, national origin, sex, and religion in any program or activity funded in whole or in part under Title I of the Community Development Act of 1974, which includes Community Development Block Grants.
8. *Low-Income Home Energy Assistance Act of 1981* (42 U.S. Code § 8625) prohibits discrimination on the basis of race, color, national origin, sex, age and disability in programs, services, and activities funded under the Act.
9. *Equal Credit Opportunity Act* (15 U.S. Code 1691) prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age, because an applicant receives income from a public assistance program, or because an applicant has in good faith exercised any right under the Consumer Credit Protection Act.

10. *Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency*, (65 Fed. Reg. 50121), issued on August 11, 2000, requires each federal agency to take steps to ensure that eligible persons with limited English proficiency are provided meaningful access to all federally-assisted and federally-conducted programs and activities.

Enabling Regulations:

- Department of Justice (June 18, 2002), 67 FR 41455- Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons
 - Department of Energy (DOE) (August 16, 2004), 69 CFR 157, Prohibition Against National Origin Discrimination affecting Persons With Limited English Proficiency (LEP); Policy Guidance.
 - HUD (January 22, 2007), 72 FR 2732- Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons
 - DHHS (August 30, 2000), 65 FR 52762- Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons
11. *Executive Orders 11625, 12432, 12138 AND OMB Circular A-102, Attachment O, Paragraph 9(a)* provide that grantees of Federal financial assistance shall take affirmative steps to assure that small and minority businesses are utilized when possible as sources of supplies, equipment, construction and services. Paragraph 9(b) requires that the grantee take similar appropriate affirmative action in support of women's business enterprises.
 12. *Violence against Women Act (42 U.S.C. § 14043e-11)* provides housing protections for victims of domestic violence, dating violence, sexual assault, and stalking in many of HUD's housing programs. VAWA also requires the establishment of emergency transfer plans for facilitating the emergency relocation of certain tenants who are victims of domestic violence, dating violence, sexual assault, or stalking.

Enabling Regulations:

- HUD 24 C.F.R. §§ 5.2001 – 5.2011- Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

State Non-Discrimination References: *Tennessee Human Rights & Disability Act (§ Tennessee Code Annotated, Title 4, Chapter 21)* prohibits discrimination related to employment, housing, and public accommodations on the basis of race, creed, color, religion, national origin, sex, age or disability. The THRA is modeled on the Fair Housing Act. The THRA applies to all housing activities and dwellings, except as exempted (TCA-4-21-602).

The Tennessee Human Rights Commission (THRC) is charged with the responsibility of verifying that all state governmental entities that are recipients of Federal financial assistance comply with its requirements.

Conflict with Federal and State Law: Should this policy conflict with any state or federal law, this policy shall be superseded to the extent necessary to comply with the law.

THDA Division or Other Policies: Other THDA policies or manuals which reference non-discrimination:

- THDA's Housing Choice Voucher Administrative Plan includes section 0770-01-05-.30 on Fair Housing Compliance, Disability Accommodation, and the Violence against Women Act, <https://s3.amazonaws.com/thda.org/Documents/Renters/HCV-Admin-Plan-Chapter-0770-01-05-effective-01.03.2019.pdf>
- THDA's Emergency Solutions Grant Program Policies and Procedures Manual, Section 6.2, Affirmative Outreach, Section 6.6, Section 504 of the Rehabilitation Act of 1973, <https://s3.amazonaws.com/thda.org/Documents/Business-Partners/Grant-Administrators/ESG-Program/ESG-Policies-and-Procedures.pdf>
- HOME Program Manual, Chapter 1, Affirmative Marketing and Chapter 6, Fair Housing and Equal Opportunity, <https://s3.amazonaws.com/thda.org/Documents/Business-Partners/Grant-Administrators/HOME-Program/2017-HOME-Manual.pdf>
- THDA's Low-Income Home Energy Assistance Program (LIHEAP) Operational Manual for Regular and Crisis Assistance, Chapter 6, 6.2 Title VI – Civil Rights Training, <https://s3.amazonaws.com/thda.org/Documents/Business-Partners/Grant-Administrators/LIHEAP/LIHEAP-18-Manual-with-forms-and-FAQ.pdf>
- THDA's Weatherization Assistance Program (WAP) Manual, 13.2.1 Title VI –Civil Rights Training, https://s3.amazonaws.com/thda.org/Documents/Business-Partners/Grant-Administrators/Weatherization/TN-WAP-Manual_2018-Final.pdf
- THDA's Qualified Allocation Plan for the Low Income Housing Tax Credit Program, Part XIII: Compliance Monitoring, <https://s3.amazonaws.com/thda.org/Documents/Business-Partners/Multi-Family-Developers/LIHTC-Program/2018-QAP-AND-EXHIBITS-10.19.2017.pdf>
- THDA ADA policy for employment, <http://homestead/Policies/ADA%20Policy.pdf>

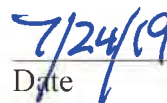
THDA Employee Consequences: Any employee who fails to comply with this policy or who encourages such conduct by others may be subject to corrective action in accordance with THDA's Discipline Policy up to and including termination of employment.

Contractor/Sub-Recipient Consequences: Any sub-recipient/grantee who fails to comply with a contractual obligation not to discriminate shall face loss of funding or other consequences as determined by the contract with THDA.

Policy Changes: This policy is subject to modification, amendment or revocation by the Executive Director at any time and for any reason.

Approved by:


Ralph Perrey, Executive Director


Date



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 State Of Tennessee 500 James Robertson Parkway 3Rd Floor Nashville, TN 37243-1204		2. Unique Federal Award Identification Number: E-20-DC-47-0001
		3. Tax Identification Number: 626001445
		4. Unique Entity Identifier (DUNS): 879015923
5. Fiscal Year (yyyy): 2020		
6. Previous Obligation (Enter "0" for initial Fiscal Year allocation)	\$ 0	
7. Amount of Funds Obligated or Deobligated by This Action (+ or -)	\$3,232,927	
8. Total Amount of Federal Funds Obligated	\$3,232,927	
9. Total Required Match: \$		
10. Start Date of Recipient's Program Year (mm/dd/yyyy) 7/1/2020	11. Date HUD Received Recipient's Consolidated Plan Submission (mm/dd/yyyy) 5/15/2020	12. Period of Performance Start Date (the date listed in Box 18) (mm/dd/yyyy) 6/22/2020
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 and Requirements <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/> Attached 15. Period of Performance End Date (24 months after the date listed in Box 18) (mm/dd/yyyy) 6/22/2022

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.) and is subject to the applicable annual appropriations act. 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. The funds may be used for costs incurred before the Period of Performance, provided the costs are otherwise allowable and were incurred on or after the dates listed in box 10 and box 11 or 90 calendar days before the date in box 12 (whichever is later), or as provided in a prior written approval by HUD. 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. Without the Recipient's execution of an amendment or other consent, HUD may amend this Agreement either to provide additional funds to the Recipient for the specified Fiscal Year or to deobligate funds under this Agreement in accordance with applicable law.

16. For the U.S. Department of HUD (Name, Title, and Contact Information of Authorized Official) Erik D. Hoglund CPD Director	17. Signature X 	18. Federal Award Date (mm/dd/yyyy) 6/22/2020
19. For the Recipient (Name and Title of Authorized Official) Bill Lee, Governor	20. Signature X 	21. Date (mm/dd/yyyy) 7/14/2020

Funding Information (HUD Accounting Use Only):

PAS Code: HAES
 Appropriation: 00192
 Appro Symbol: F

Region: 04
 Office: (Knoxville)

Program Code: SOE
 Allotment: 868

Special Conditions and Requirements for FY 2020 ESG Program

Indirect Cost Rate

The Recipient shall attach a schedule of its indirect cost rate(s) in the format set forth below to the executed Agreement that is returned to HUD. The Recipient shall provide HUD with a revised schedule when any change is made to the rate(s) described in the schedule. The schedule and any revisions HUD receives from the Recipient shall be incorporated herein and made a part of this Agreement, provided that the rate(s) described comply with 2 CFR part 200, subpart E.

Instructions: The Recipient must identify each agency or department of the Recipient that will carry out activities under the grant, the indirect cost rate applicable to each department/agency (including if the de minimis rate is used per 2 CFR §200.414(f)), and the type of direct cost base to which the rate will be applied (for example, Modified Total Direct Costs (MTDC)). 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>30.32 %</u>	<u>\$2,568,827</u>
<u></u>	<u>%</u>	<u></u>
<u></u>	<u>%</u>	<u></u>

Special Conditions and Requirements for FY 2020 ESG Program

Serving Youth Who Lack 3rd Party Documentation or Live in Unsafe Situations

Notwithstanding any contrary requirements under the McKinney-Vento Homeless Assistance Act or 24 CFR part 576, youth aged 24 and under who seek assistance (including shelter, services or rental assistance) shall not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving assistance; and unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence shall be considered homeless for purposes of assistance provided by any private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under.

Recipient Integrity and Performance Matters

(applicable if the amount in Box 8 of the Agreement is greater than \$500,000)

The Recipient shall comply with the requirements in Appendix XII to 2 CFR part 200—Award Term and Condition for Recipient Integrity and Performance Matters.



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 State Of Tennessee 500 James Robertson Parkway 3Rd Floor Nashville, TN 37243-1204		2. Unique Federal Award Identification Number: E-20-DC-47-0001	
		3. Tax Identification Number: 626001445	
		4. Unique Entity Identifier (DUNS): 879015923	
5. Fiscal Year (yyyy): 2020			
6. Previous Obligation (Enter "0" for initial Fiscal Year allocation)		\$ 0	
7. Amount of Funds Obligated or Deobligated by This Action (+ or -)		\$3,232,927	
8. Total Amount of Federal Funds Obligated		\$3,232,927	
9. Total Required Match: \$			
10. Start Date of Recipient's Program Year (mm/dd/yyyy) 7/1/2020		11. Date HUD Received Recipient's Consolidated Plan Submission (mm/dd/yyyy) 5/15/2020	12. Period of Performance Start Date (the date listed in Box 18) (mm/dd/yyyy) 6/22/2020
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 and Requirements <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/> Attached 15. Period of Performance End Date (24 months after the date listed in Box 18) (mm/dd/yyyy) 6/22/2022	

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.) and is subject to the applicable annual appropriations act. 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. The funds may be used for costs incurred before the Period of Performance, provided the costs are otherwise allowable and were incurred on or after the dates listed in box 10 and box 11 or 90 calendar days before the date in box 12 (whichever is later), or as provided in a prior written approval by HUD. 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. Without the Recipient's execution of an amendment or other consent, HUD may amend this Agreement either to provide additional funds to the Recipient for the specified Fiscal Year or to deobligate funds under this Agreement in accordance with applicable law.

16. For the U.S. Department of HUD (Name, Title, and Contact Information of Authorized Official) Erik D. Hoglund CPD Director	17. Signature X 	18. Federal Award Date (mm/dd/yyyy) 6/22/2020
19. For the Recipient (Name and Title of Authorized Official) Bill Lee, Governor	20. Signature X 	21. Date (mm/dd/yyyy) 7/14/2020

Funding Information (HUD Accounting Use Only):

PAS Code: HAES
 Appropriation: 00192
 Appro Symbol: F

Region: 04
 Office: (Knoxville)

Program Code: SOE
 Allotment: 868

Special Conditions and Requirements for FY 2020 ESG Program

Indirect Cost Rate

The Recipient shall attach a schedule of its indirect cost rate(s) in the format set forth below to the executed Agreement that is returned to HUD. The Recipient shall provide HUD with a revised schedule when any change is made to the rate(s) described in the schedule. The schedule and any revisions HUD receives from the Recipient shall be incorporated herein and made a part of this Agreement, provided that the rate(s) described comply with 2 CFR part 200, subpart E.

Instructions: The Recipient must identify each agency or department of the Recipient that will carry out activities under the grant, the indirect cost rate applicable to each department/agency (including if the de minimis rate is used per 2 CFR §200.414(f)), and the type of direct cost base to which the rate will be applied (for example, Modified Total Direct Costs (MTDC)). 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>30.32 %</u>	<u>\$2,568,827</u>
<u></u>	<u>%</u>	<u></u>
<u></u>	<u>%</u>	<u></u>

Special Conditions and Requirements for FY 2020 ESG Program

Serving Youth Who Lack 3rd Party Documentation or Live in Unsafe Situations

Notwithstanding any contrary requirements under the McKinney-Vento Homeless Assistance Act or 24 CFR part 576, youth aged 24 and under who seek assistance (including shelter, services or rental assistance) shall not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving assistance; and unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence shall be considered homeless for purposes of assistance provided by any private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under.

Recipient Integrity and Performance Matters

(applicable if the amount in Box 8 of the Agreement is greater than \$500,000)

The Recipient shall comply with the requirements in Appendix XII to 2 CFR part 200—Award Term and Condition for Recipient Integrity and Performance Matters.

April 2, 2020

The Honorable William "Bill" Lee
Governor of Tennessee
State Capitol 1st Floor
600 Charlotte Avenue
Nashville, TN 37243-0001

Dear Governor Lee:

I am pleased to inform you of special Emergency Solutions Grants (ESG) Program funds HUD is allocating to your jurisdiction in the amount of \$11,148,024, as authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136. These special ESG-CV funds are to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19) among individuals and families who are homeless or receiving homeless assistance; and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19.

President Trump signed the CARES Act on March 27, 2020 to help the Nation respond to the coronavirus outbreak. The CARES Act made available an additional \$4 billion in ESG-CV funds to supplement the Fiscal Year (FY) 2020 ESG funding provided under the Further Consolidated Appropriations Act, 2020 (Public Law 116-94). Of this amount, the Department is immediately allocating \$1 billion for ESG-CV grants based on the FY 2020 ESG formula. The rest of the funding for ESG-CV grants will be allocated directly to States or units of local government by a separate formula developed by the Secretary. Up to \$40 million of the additional funds will be set aside for technical assistance.

Given the immediate needs faced by our communities, the Department has announced the first allocation of funds, which are subject to the following flexibilities and conditions provided by the CARES Act:

- The funds may be used to cover or reimburse allowable costs incurred by a State or locality before the award of funding (including prior to the signing of the CARES Act) to prevent, prepare for, and respond to COVID-19;
- The funds are not subject to the spending cap on emergency shelter and outreach under 24 CFR 576.100(b)(1);
- Up to 10 percent of funds may be used for administrative costs, as opposed to 7.5 percent as provided by 24 CFR 576.108(a);
- The funds are exempt from the ESG match requirements, including 24 CFR 576.201;
- The funds are not subject to the consultation and citizen participation requirements that otherwise apply to the Emergency Solutions Grants, however each recipient must

publish how its allocation has and will be used, at a minimum, on the Internet at the appropriate Government web site or through other electronic media;

- The funds may be used to provide homelessness prevention assistance (as authorized under 24 CFR 576.103 or subsequent HUD notices) to any individual or family who does not have income higher than HUD's Very Low-Income Limit for the area and meets the criteria in paragraphs (1)(ii) and (1)(iii) of the "at risk of homelessness" definition in 24 CFR 576.3;
- That recipients may deviate from applicable procurement standards when using these funds to procure goods and services to prevent, prepare for, and respond to coronavirus, notwithstanding 24 CFR 576.407(f) and 2 CFR 200.317-200.326;
- While we encourage you to offer treatment and supportive services when necessary to assist vulnerable homeless populations, individuals and families experiencing homelessness must not be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which these funds are used, notwithstanding 24 CFR 576.401(e).

In addition, the Act authorizes the Secretary to grant waivers of and specify alternative requirements for statutes and regulations the Secretary administers in connection with the use of ESG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). These waivers and alternative requirements can be issued when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.

The Department is developing a notice that will further lay out the CARES Act provisions and other waivers and requirements to enable swift implementation of additional ESG-CV grants. This notice and any subsequent notices of waivers and alternative requirements will be made available on HUD's website and distributed to grantees. The Department will also support grantees with technical assistance.

As your jurisdiction develops its plan to use these grant funds, HUD encourages approaches that prioritize the unique needs of persons experiencing homelessness and the development of partnerships between all levels of government and the private for-profit and non-profit sectors. Your jurisdiction should coordinate with State and local health authorities before undertaking any activity to support state or local pandemic response. HUD encourages you to share successes that may help other grantees. Like other supplemental funding, ESG-CV grants are subject to oversight and tracking, such as requirements to prevent the duplication of benefits. We look forward to working with you to prevent fraud, waste, and abuse and to document the impact of this program for beneficiaries.

Importantly, proper reporting in the Integrated Disbursement and Information System (IDIS) is critical to ensuring grantees are complying with program requirements and policies, providing demographic and income information about the persons who benefit from funded activities, and allowing HUD to monitor recipients. Your jurisdiction's ongoing attention is essential to ensuring complete and accurate reporting of performance measurement data.

HUD's Office of Community Planning and Development (CPD) is looking forward to working with your jurisdiction to successfully meet the urgent and complex challenges faced by our communities. If you or your staff has questions, please contact your local CPD Field Office Director or CPDQuestionsAnswered@hud.gov.

Sincerely,


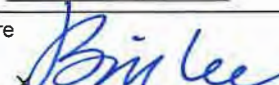
A handwritten signature in black ink, appearing to read 'John Gibbs', with a stylized, cursive script.

John Gibbs
Acting Assistant Secretary
for Community Planning and Development
U.S. Department of Housing and Urban Development

Funding Approval and HOME Investment Partnerships Agreement

Title II of the National Affordable Housing Act

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

1. Participant Name and Address State Of Tennessee 500 James Robertson Parkway 3Rd Floor Nashville, TN 37243-1204		2. Grant Number M20-SG470100	
		3a. Tax Identification Number 626001445	3b. Unique Entity Identifier (formerly DUNS) 879015923
		4. Appropriation Number 860/30205	5. FY (yyyy) 2020
6. Previous Obligation (Enter "0" for initial FY allocation)			\$0.00
a. Formula Funds			\$14,430,484
b. Community Housing Development Org. (CHDO) Competitive			
7. Current Transaction (+ or -)			\$14,430,484
a. Formula Funds			\$14,430,484
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 (HUD Official's Date of Signature) (mm/dd/yyyy) 6/22/2020	
11. Indirect Cost Rate*		12. Period of Performance Date in Box #10 - 09/01/2028	
<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.
THDA	30.32 %	\$2,568,827	
—	%		
—	%		
<p>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.</p> <p>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.</p> <p>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.</p>			
13. For the U.S. Department of HUD (Name and Title of Authorized Official)		14. Signature 	15. Date 6/22/2020
16. For the Participating Jurisdiction/Entity (Name and Title of Authorized Official) Bill Lee, Governor		17. Signature 	18. Date 7/14/2020
19. Check one: <input checked="" type="checkbox"/> Initial Agreement <input type="checkbox"/> Amendment #			
20. Funding Information:			
<u>Source of Funds</u> 2020	<u>Appropriation Code</u> 860/30205	<u>PAS Code</u> HMF (H)	<u>Amount</u> \$14,430,484

Funding Approval and HOME Investment Partnerships Agreement

Title II of the National Affordable Housing Act

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

1. Participant Name and Address State Of Tennessee 500 James Robertson Parkway 3Rd Floor Nashville, TN 37243-1204		2. Grant Number M20-SG470100	
		3a. Tax Identification Number 626001445	3b. Unique Entity Identifier (formerly DUNS) 879015923
		4. Appropriation Number 860/30205	5. FY (yyyy) 2020
6. Previous Obligation (Enter "0" for initial FY allocation)			\$0.00
a. Formula Funds		\$14,430,484	
b. Community Housing Development Org. (CHDO) Competitive			
7. Current Transaction (+ or -)			\$14,430,484
a. Formula Funds		\$14,430,484	
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 (HUD Official's Date of Signature) (mm/dd/yyyy) 6/22/2020	
11. Indirect Cost Rate*		12. Period of Performance Date in Box #10 - 09/01/2028	
<u>Administering Agency/Dept.</u> THDA	<u>Indirect Cost Rate</u> 30.32 %	<u>Direct Cost Base</u> \$2,568,827	* 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)	14. Signature x <i>End of Highway</i>	15. Date 1 / 1 6/22/2020
16. For the Participating Jurisdiction/Entity (Name and Title of Authorized Official) Bill Lee, Governor	17. Signature x <i>Bill Lee</i>	18. Date 7 / 14 / 2020

19. Check one:

☒ Initial Agreement☐ Amendment #

20. Funding Information:

Source of Funds	HOME	PAS Code	Amount
2020	860/30205	HMF (H)	\$14,430,484

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 State Of Tennessee 500 James Robertson Parkway 3Rd Floor Nashville, TN 37243-1204		2. Grant Number F20-SG470100	
		3. Tax Identification Number 626001445	4. Unique Entity Identifier (formerly DUNS) 809790579
		5. Appropriation Number 86 X 8560	6. FY (yyyy) 2020
7. Previous Obligation (Enter "0" for initial FY allocation)			\$ 0
a. Formula Funds			\$
8. Current Transaction (+ or -)			\$4,334,563
a. Formula Funds			\$4,334,563
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 (HUD Official's Date of Signature) (mm/dd/yyyy) /6/22/2020	
12. Indirect Cost Rate*		13. Period of Performance Date in Box #11 – 09/01/2027	
<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.
THDA	30.32 %	\$2,568,827	
—	%		
—	%		
—	%		

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) Erik Hoglund, CPD Director	15. Signature X 	16. Date / / 6/22/2020
17. For the Grantee (Name and Title of Authorized Official) Bill Lee, Governor	18. Signature X 	19. Date 7/14/2020

20. Check one:

☒ Initial Agreement☐ Amendment #

21. Funding Information: HTF

Source of Funds	Appropriation Code	PAS Code	Amount
2020	86 X 8560-20	HTF (E)	\$4,113,847
2019	86 X 8560-19	HTF (D)	\$220,571
2018	86 X 8560-18	HTF (C)	\$ 145

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 State Of Tennessee 500 James Robertson Parkway 3Rd Floor Nashville, TN 37243-1204		2. Grant Number F20-SG470100	
		3. Tax Identification Number 626001445	4. Unique Entity Identifier (formerly DUNS) 809790579
		5. Appropriation Number 86 X 8560	6. FY (yyyy) 2020
7. Previous Obligation (Enter "0" for initial FY allocation)			\$ 0
a. Formula Funds			\$
8. Current Transaction (+ or -)			\$4,334,563
a. Formula Funds			\$4,334,563
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 (HUD Official's Date of Signature) (mm/dd/yyyy) /6/22/2020	
12. Indirect Cost Rate*		13. Period of Performance Date in Box #11 – 09/01/2027	
<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.
THDA	30.32 %	\$2,568,827	
—	%		
—	%		
—	%		

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) Erik Hoglund, CPD Director	15. Signature X 	16. Date / / 6/22/2020
17. For the Grantee (Name and Title of Authorized Official) Bill Lee, Governor	18. Signature X 	19. Date 7/14/2020

20. Check one:

☒ Initial Agreement☐ Amendment #

21. Funding Information: HTF

Source of Funds	Appropriation Code	PAS Code	Amount
2020	86 X 8560-20	HTF (E)	\$4,113,847
2019	86 X 8560-19	HTF (D)	\$220,571
2018	86 X 8560-18	HTF (C)	\$ 145



Department of Health and Human Services
Administration for Children and Families

Notice of Award

Award # 2001TNLIEA

FAIN# 2001TNLIEA

Federal Award Date: April 3, 2020

Recipient Information**1. Recipient Name**

TENNESSEE HOUSING DEVELOPMENT
AGENCY
123 Unknown Street

NASHVILLE, TENNESSEE 37248 0900

2. Congressional District of Recipient

*See Remarks

3. Payment Account Number and Type

*See Remarks

4. Employer Identification Number (EIN)

XXXXXXXXXXXX

5. Data Universal Numbering System (DUNS)

878047489

6. Recipient's Unique Entity Identifier

*See Remarks

7. Project Director or Principal Investigator

Blake Worthington

bworthington@thda.org

8. Authorized Official

*See Remarks

Federal Agency Information**9. Awarding Agency Contact Information**

Timothy Chappelle
Grants Management Officer
tim.chappelle@acf.hhs.gov
N/A

10. Program Official Contact Information

Janelle George
Acting Deputy Director
Office of Community Services
MGM Grantor@grantsolutions.gov
(202) 401-9351

Federal Award Information**11. Award Number**

2001TNLIEA

12. Unique Federal Award Identification Number (FAIN)

2001TNLIEA

13. Statutory Authority

Tit XXVI OBRA 1981 S2601

14. Federal Award Project Title

*See Remarks

15. Catalog of Federal Domestic Assistance (CFDA) Number

93.568

16. CFDA Program Title

Low-Income Home Energy Assistance

17. Award Action Type

*See Remarks

18. Is the Award R&D?

*See Remarks

Summary Federal Award**19. Budget Period Start Date** 10-01-2019**20. Total Amount of Federal Funds Obligated by this Action**

20a. Direct Cost Amount

20b. Indirect Cost Amount Administrative Offset

21. Authorized Carryover

22. Offset

23. Total Amount of Federal Funds Obligated this budget period

24. Total Approved Cost Sharing or Matching, where applicable**25. Total Federal and Non-Federal Approved****26. Project Period Start Date** 10-01-2019 -

27. Total Amount of the Federal Award including Approved Cost Sharing or Matching

Financial Information

End Date 09-30-2020

\$829,084.00

*See Remarks

*See Remarks

*See Remarks

*See Remarks

\$72,424,215.00

*See Remarks

*See Remarks

End Date 09-30-2021

*See Remarks

28. Authorized Treatment of Program Income

*See Remarks

29. Grants Management Officer – Signature

Timothy Chappelle
Grants Management Officer

Footnotes

*This award represents the third and final release of federal regular block LIHEAP funding appropriated by Congress pursuant to Public Law 116-94 for federal Fiscal Year 2020.



Department of Health and Human Services
Administration for Children and Families

Notice of Award

Award # 2001TNLIEA

FAIN# 2001TNLIEA

Federal Award Date: April 3, 2020

Recipient Information

TENNESSEE HOUSING DEVELOPMENT AGENCY

123 Unknown Street

NASHVILLE, TENNESSEE 37248 0900

Employer Identification Number (EIN): XXXXXXXXXXXXX**Data Universal Numbering System (DUNS):** 878047489**Recipient's Unique Entity Identifier:** *See Remarks**Object Class:** 41.15**Financial Information**

<u>Appropriation</u>	<u>CAN</u>	<u>Allotment</u>	<u>Award this action</u>	<u>Cumulative Grant</u>	<u>Document Number</u>	<u>Funding Type</u>
				<u>Award to Date</u>		
75-20-1502	2020,G992201	\$829,084.00	\$829,084.00	\$72,424,215.00	G-2001TNLIEA	Formula

Terms and Conditions

This grant award represents the allocation for the Low Income Home Energy Assistance program. 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 recipient to expend funds in accordance with the recipients Plan. Determinations as to whether the recipient 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. 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 the end of Federal Fiscal Year 2020.

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.

The electronic Terms and Conditions that apply to this program can be found at <https://www.acf.hhs.gov/grants/post-award-requirements>.

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

Remarks

* This field is intended to be included in the standardized Notice of Award and will be displayed in subsequent quarters:



Department of Health and Human Services
Administration for Children and Families

Notice of Award

Award # 2001TNE5C3

FAIN# 2001TNE5C3

Federal Award Date: May 8, 2020

Recipient Information**1. Recipient Name**TENNESSEE HOUSING DEVELOPMENT
AGENCY502 Deaderick Street, 3rd Floor
Nashville, TN 37243-0900

NASHVILLE, TENNESSEE 37243 0900

2. Congressional District of Recipient

*See Remarks

3. Payment Account Number and Type

*See Remarks

4. Employer Identification Number (EIN)

XXXXXXXXXXXX

5. Data Universal Numbering System (DUNS)

878047489

6. Recipient's Unique Entity Identifier

*See Remarks

7. Project Director or Principal Investigator

Blake Worthington

bworthington@thda.org

8. Authorized Official

*See Remarks

Federal Agency Information**9. Awarding Agency Contact Information**

Timothy Chappelle

Grants Management Officer

tim.chappelle@acf.hhs.gov

N/A

10. Program Official Contact Information

Janelle George

Acting Deputy Director

Office of Community Services

MGM_Grantor@grantsolutions.gov

(202) 401-9351

Federal Award Information**11. Award Number**

2001TNE5C3

12. Unique Federal Award Identification Number (FAIN)

2001TNE5C3

13. Statutory Authority

Coronavirus Aid, Relief, and Economic Security (CARES) Act, 2020 [P.L. 116-136]

14. Federal Award Project Title

*See Remarks

15. Catalog of Federal Domestic Assistance (CFDA) Number

93.568

16. CFDA Program Title

Low-Income Home Energy Assistance

17. Award Action Type

*See Remarks

18. Is the Award R&D?

*See Remarks

Summary Federal Award**19. Budget Period Start Date** 03-27-2020**20. Total Amount of Federal Funds Obligated by this Action**

20a. Direct Cost Amount

20b. Indirect Cost Amount Administrative Offset

21. Authorized Carryover

22. Offset

23. Total Amount of Federal Funds Obligated this budget period

24. Total Approved Cost Sharing or Matching, where applicable**25. Total Federal and Non-Federal Approved****26. Project Period Start Date** 03-27-2020 -

27. Total Amount of the Federal Award including Approved Cost Sharing or Matching

Financial Information**End Date** 09-30-2021

\$18,060,947.00

*See Remarks

*See Remarks

*See Remarks

*See Remarks

\$18,060,947.00

*See Remarks

*See Remarks

End Date 09-30-2021

*See Remarks

28. Authorized Treatment of Program Income

*See Remarks

29. Grants Management Officer – Signature

Timothy Chappelle

Grants Management Officer

Footnotes

*This award reflects 100% of the funding available to you under the CARES Act, Public Law 116-136 (2020), to use home energy assistance to help prevent, prepare for, or respond to the coronavirus. The normal terms and conditions applicable to the Low Income Home Energy Assistance Program (LIHEAP) at 42 U.S.C. § 8621 et seq. and 45 C.F.R. Part 96 apply to these funds, with one exception—the requirement (42 U.S.C. § 8626(b)(2)(B)) is waived regarding obligating 90% of the funding in the first federal fiscal year. You may obligate this funding at any point through September 30, 2021. No carryover is permitted into FY 2022. You must track, account for, and report on this funding separately from your regular FY 2020 LIHEAP block grant funding (45 C.F.R. § 96.30(a)).



Department of Health and Human Services
Administration for Children and Families

Notice of Award

Award # 2001TNE5C3

FAIN# 2001TNE5C3

Federal Award Date: May 8, 2020

Recipient Information

TENNESSEE HOUSING DEVELOPMENT AGENCY

502 Deaderick Street, 3rd Floor

Nashville, TN 37243-0900

NASHVILLE, TENNESSEE 37243 0900

Employer Identification Number (EIN): XXXXXXXXXXXXX**Data Universal Numbering System (DUNS):** 878047489**Recipient's Unique Entity Identifier:** *See Remarks**Object Class:** 41.15**Financial Information**

<u>Appropriation</u>	<u>CAN</u>	<u>Allotment</u>	<u>Award this action</u>	<u>Cumulative Grant</u>	<u>Document Number</u>	<u>Funding Type</u>
				<u>Award to Date</u>		
75-2021-1502	2020,G990918		\$18,060,947.00	\$18,060,947.00	2001TNE5C3	The CARES Act 2020

Terms and Conditions

This grant award reflects 100% of the funding available to you under the CARES Act, Public Law 116-136 (2020), to use home energy assistance to help prevent, prepare for, or respond to the coronavirus.

The normal terms and conditions applicable to the Low Income Home Energy Assistance Program (LIHEAP) at 42 U.S.C. § 8621 et seq. and 45 C.F.R. Part 96 apply to these funds, with one exception—the requirement (42 U.S.C. § 8626(b)(2)(B)) is waived regarding obligating 90% of the funding in the first federal fiscal year. You may obligate this funding at any point through September 30, 2021. No carryover is permitted into FY 2022. You must track, account for, and report on this funding separately from your regular FY 2020 LIHEAP block grant funding (45 C.F.R. § 96.30(a)). Further guidance will be disseminated about reporting requirements.

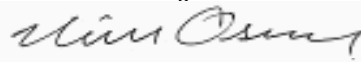
Remarks

* This field is intended to be included in the standardized Notice of Award and will be displayed in subsequent quarters:

The Office of Grants Management contact for this grant is should be directed to Daniel Jackson, Daniel.Jackson@acf.hhs.gov or (202) 401-3446.

Footnote Continuation

Further guidance will be disseminated about reporting requirements.

ASSISTANCE AGREEMENT				
1. Award No. DE-EE0007951		2. Modification No. 0004	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 EE-1 U.S. Department of Energy 1000 Independence Avenue, S.W. Washington DC 20585		7. Period of Performance 07/01/2017 through 06/30/2021
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. 20EE002037	
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: \$19,942,960.00 Cost Share : \$0.00 Total : \$19,942,960.00		13. Funds Obligated This action: \$5,875,208.00 Total : \$19,942,960.00
14. Principal Investigator	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 Payment - Direct Payment from U.S. Dept of Treasury		18. Paying Office Payment - Direct Payment from U.S. Dept of Treasury		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 		
23. Name and Title	24. Date Signed	26. Name of Officer Nicholas C. Oscarsson		27. Date Signed 06/25/2020

CONTINUATION SHEET		REFERENCE NO. OF DOCUMENT BEING CONTINUED DE-EE0007951/0004			PAGE 2	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)	
	<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: 07/01/2019 - 06/30/2021</p> <p>Project Period: 07/01/2017 - 06/30/2021</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 purposes of this action are to:</p> <p>1) Obligate Program Year 2020 funds and to authorize performance of Program Year 2020 activities; and</p> <p>2) Approve the combination of Program Year 2019 and 2020 into the current Budget Period.</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>All other terms and conditions remain unchanged</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--</p> <p>Continued ...</p>					

Appendix D-5

CONTINUATION SHEET		REFERENCE NO. OF DOCUMENT BEING CONTINUED DE-EE0007951/0004			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)	
	(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." ASAP: YES Extent Competed: NOT AVAIL FOR COMP Davis-Bacon Act: NO PI: Worthington, Blake					



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

May 28, 2020

TN903
TENNESSEE HOUSING DEV AGENCY
502 DEADERICK STREET
NASHVILLE, TN 37243-7243

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,
O = Financial Management Center,
OU = Division Director
Reason: I am approving this document

Division Director

Enclosure

Memo Reference: 20-103

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
June 2019	\$2,908,313	\$126,817
June 2019		\$157,914
July 2019	\$3,051,855	\$284,732
August 2019	\$3,051,855	\$284,733
September 2019	\$3,138,739	\$284,733
October 2019	\$3,138,739	\$284,732
November 2019	\$3,207,993	\$325,499
December 2019	\$3,207,993	\$325,499
December 2019	\$558,000	
December 2019		\$86,375
January 2020	\$3,249,276	\$325,499
January 2020	\$296,000	
February 2020	\$3,249,276	\$325,499
March 2020	\$3,301,232	\$381,495
April 2020	\$3,280,793	\$381,495
April 2020		\$1,000
April 2020	\$296,482	\$352,907
May 2020	\$3,280,793	\$381,495
May 2020		\$984,496
June 2020	\$3,368,461	\$394,360
July 2020	\$3,368,461	\$394,360
August 2020	\$3,368,461	\$394,361
September 2020		\$394,361
October 2020		\$394,361



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

May 28, 2020

TN903
TENNESSEE HOUSING DEV AGENCY
502 DEADERICK STREET
NASHVILLE, TN 37243-7243

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,
O = Financial Management Center,
OU = Division Director
Reason: I am approving this document

Division Director

Enclosure

Memo Reference: 20-102

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
June 2019	\$20,750	\$2,906
June 2019	\$37,750	
June 2019		\$3,333
July 2019	\$20,398	\$2,976
July 2019	\$37,749	
July 2019		\$1,667
July 2019		\$1,591
August 2019	\$20,398	\$2,976
August 2019	\$37,750	
August 2019		\$1,666
September 2019	\$20,398	\$2,976
September 2019	\$37,750	
September 2019		\$1,666
October 2019		\$2,976
October 2019		\$1,667
November 2019	\$19,996	\$2,976
November 2019		\$1,666
December 2019	\$19,996	\$2,976
December 2019		\$1,666
January 2020	\$19,887	\$2,936
February 2020	\$19,887	\$2,936
February 2020	\$34,724	
March 2020	\$21,253	\$3,216
April 2020	\$20,478	\$3,216
May 2020	\$21,029	\$3,509
May 2020		\$8,568
June 2020	\$21,029	\$3,509



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

May 18, 2020

TN903
TENNESSEE HOUSING DEV AGENCY
502 DEADERICK STREET
3RD FLOOR
NASHVILLE, TN 37243-7243

Dear Executive Director:

I am pleased to notify you that your public housing agency (PHA) is eligible for an increase in Mainstream vouchers and funding as authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) (Public Law 116-136). The CARES Act directs the Department of Housing and Urban Development (HUD) to proportionally allocate additional vouchers to PHAs that received an award under either of the two most recent Notices of Funding Availability (NOFAs). *PIH Notice 2020-09: CARES Act Mainstream Funding for Public Housing Authorities (PHAs) Awarded Funding Allocations in the 2017 and 2019 Competitions* details this increase in funding.

The following table identifies the funding you are eligible to receive:

Term	Budget Authority	Number of Units
12	\$147,185	30

Every PHA that received an award through the FY 2017 or FY 2019 Mainstream Voucher Program NOFAs is eligible to receive a 30 percent increase in the number of vouchers it received between the two NOFAs. If a 30 percent increase in vouchers resulted in a fraction of a voucher being allocated, HUD rounded up to the next whole number. For example, if the PHA was awarded 22 vouchers through FR-6100-N-43 and 30 vouchers through FR-6300-N-43 for a total of 52 vouchers, the PHA will receive 16 new vouchers.

Please contact your Financial Analyst at the Financial Management Center (FMC) by Friday, May 29, 2020, to select the effective date when your PHA may begin leasing these vouchers. The effective date may be as early as May 1, 2020, and no later than October 1, 2020. Alternatively, **if you choose to decline these vouchers**, please notify your Financial Analyst by May 29, 2020. If you do not contact your Financial Analyst by May 29, 2020, HUD will obligate the funds and your effective date will default to August 1, 2020.

Please remember, as with the regular voucher program, the awarded budget authority and number of units both serve as a cap. Your agency may only lease until you have reached the lower of your budget authority or number of units allocated. If you have money left but you have leased all the awarded units, this extra funding will go into your agency's Mainstream HAP reserves. If you are on track to spend all of the awarded funding but still have units left, stop leasing before you run out of

www.hud.gov

espanol.hud.gov

money.

The FMC will provide your agency with an amended Annual Contributions Contract that reflects the obligation of funds and monthly disbursements will be scheduled. Initially, the first three months of disbursements will be automatically scheduled. Each disbursement will equal 1/12th of your award amount. Thereafter, monthly disbursements will be scheduled based on monthly Mainstream expenses reported in the Voucher Management System (VMS). If you have not leased any vouchers by month three, you will not receive additional disbursements until VMS data shows you are incurring HAP expenses. If at any time such disbursements are not sufficient to cover your monthly expenses, your agency should contact your Financial Analyst at the Financial Management Center.

Your agency must follow all HCV program requirements when administering the Mainstream Voucher Program, including the regulations at 24 CFR part 982, and the requirements in *PIH Notice 2020-09*. Your PHA is required to follow relevant statutes, regulations, and HUD guidance.

To ensure that Mainstream families are recorded properly, you must record MS5 on line 2n of the form HUD-50058 (Family Report). Remember to accurately record families who are homeless at admission on line 4c of the HUD-50058. Mainstream vouchers and corresponding HAP expenses must be accurately reported in VMS. The Mainstream Voucher Program is reported separately in FASS-PH under the CFDA code 14.879.

Additional information regarding the Mainstream Voucher Program can be found at:
https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/mainstream.

Please contact MainstreamVouchers@hud.gov if you have any questions

Sincerely

Danielle L Bastarache
Digital signed by Danielle L Bastarache
DN: CN = Danielle L Bastarache, C = US
Reason: I am approving this document

Deputy Assistant Secretary for
Public Housing and Voucher Programs

Attachment

Memo Reference: 20-100



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

May 8, 2020

TN903
TENNESSEE HOUSING DEV AGENCY
502 DEADERICK STREET
3RD FLOOR
NASHVILLE, TN 37243-7243

Dear Executive Director:

SUBJECT: CY 2020 Housing Choice Vouchers – CARES Act Administrative Fees,
Mainstream Administrative Fees, and MTW Embedded Fees

Your agency was notified in a letter date May 7, 2020 that it has been awarded administrative fee funding under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). This letter and enclosed table provide the specific details of the funding awarded and information concerning the disbursement of these funds. Funds have been obligated and scheduled for disbursement in May 2020.

These funds must be administered in accordance with the CARES Act requirements. Information about these requirements is provided in PIH Notice 2020-08.

Enclosed is your Notice to Amend the Consolidated Annual Contributions Contract (CACC) with revised funding exhibits reflecting the change(s) described above. The amendment notice and revised funding exhibits should be filed with your most recent CACC. No execution by HUD or your PHA is required.

Public housing agencies receiving an increment in excess of \$100,000 in Budget Authority (BA) are required to submit Form HUD-50071, Certification of Payments to Influence Federal Transactions, and if applicable, Form SF-LLL, Disclosure of Lobbying Activities. If this letter notifies you of a renewal in excess of \$100,000, and your PHA has not submitted the Form(s) HUD-50071 (and SF-LLL where applicable) for your current fiscal year; the documents must be submitted to your local field office and Financial Analyst at the Financial Management Center (FMC) within 30 days of the date of this letter. These forms are located on the Internet at the following addresses:

Form HUD-50071

<https://www.hud.gov/sites/documents/50071.PDF>

Form SF-LLL

<https://www.hudexchange.info/resources/documents/HUD-Form-Sflll.pdf>

www.hud.gov

espanol.hud.gov

Please contact your Financial Analyst at the FMC if you have any questions.

Sincerely

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

Division Director

Enclosure(s)

Memo Reference: 20-097

Increment Number Table**U. S. Department of Housing and Urban Development**
Office of Public and Indian Housing

Housing Choice Voucher Program

Section 8

May 8, 2020

Funding Increment Number	Effective Date	Term (Months)	BA Assigned
TN9038F0035	5/1/2020	1	\$8,568
TN903AF0151	5/1/2020	1	\$984,496

**Consolidated
Annual Contributions Contract**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Housing Choice Voucher Program

Section 8

**HUD NOTICE TO HOUSING AGENCY AMENDING
CONSOLIDATED ANNUAL CONTRIBUTIONS CONTRACT**

**Housing Agency: TN903
TENNESSEE HOUSING DEV AGENCY**

In accordance with Paragraph 2.c. of the Consolidated Annual Contributions Contract between HUD and the HA, you are notified that the funding exhibits of the Consolidated Annual Contributions Contract is hereby revised to add a new funding increment as provided in the attached revised funding exhibit. (This notice adds one or more funding increments listed on the attached funding exhibit.)

The revised funding exhibit is attached to this HUD notice. This revised funding exhibit replaces and revises the prior funding exhibit.

In accordance with Paragraph 2.d. of the Consolidated Annual Contributions Contract, this HUD notice and the attached funding exhibit constitutes an amendment to the Consolidated Annual Contributions Contract.

United States of America

Secretary of Housing and Urban Development
Authorized Representative

Date of Document:

Robert H. Boepple, Director
Financial Management Center

5/8/2020

Form HUD-52520A (12/97)

U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
PIH SECTION 8 - FUNDING EXHIBIT
PROGRAM-BASED

ACC NUMBER: TN903

FIELD OFFICE: 4LPH

TN903
TENNESSEE HOUSING DEV AGENCY
502 DEADERICK STREET
3RD FLOOR
NASHVILLE, TN 37243

HA FISCAL YEAR-END: 06/30

PROGRAM TYPE: VOUCHER PROGRAM/5 YEAR MAINSTREAM

FUNDING INCREMENT NUMBER	FIRST DAY OF TERM	LAST DAY OF TERM	CONTRACT TERM	BUDGET AUTHORITY	UNITS
TN9038F0021	5/1/2018	5/31/2018	1	3,089	N/A
TN9038FR417	5/1/2018	5/31/2018	1	6,911	N/A
TN903AF0133	5/1/2018	5/31/2018	1	373,910	N/A
TN903DV0029	5/1/2018	5/31/2018	1	19,748	50
TN903VO0284	5/1/2018	5/31/2018	1	3,000,714	6146
TN9038F0022	6/1/2018	6/30/2018	1	2,842	N/A
TN903AF0134	6/1/2018	6/30/2018	1	373,910	N/A
TN903AF0136	6/1/2018	6/30/2018	1	600	N/A
TN903AFR417	6/1/2018	6/30/2018	1	668,613	N/A
TN903DV0030	6/1/2018	6/30/2018	1	19,619	50
TN903VO0285	6/1/2018	6/30/2018	1	3,023,150	6146
TN903VOPR17	6/1/2018	6/30/2018	1	26,964	N/A
TN903AF0135	7/1/2018	7/31/2018	1	373,910	N/A
TN903VO0286	7/1/2018	7/31/2018	1	3,023,150	6146
TN903AF0137	8/1/2018	9/30/2018	2	747,820	N/A
TN903VO0288	8/1/2018	9/30/2018	2	6,150,874	6146
TN903AF0138	10/1/2018	10/31/2018	1	373,910	N/A
TN903VO0289	10/1/2018	10/31/2018	1	3,030,594	6146
TN903VO0290	10/1/2018	10/31/2018	1	165,765	N/A
TN9038F0023	7/1/2018	12/31/2018	6	17,052	N/A
TN903AF0139	11/1/2018	12/31/2018	2	804,772	N/A
TN903AFHV20	12/1/2018	12/31/2018	1	800	N/A
TN903DV0031	7/1/2018	12/31/2018	6	117,714	50
TN903DV0036	12/1/2018	12/31/2018	1	981	N/A
TN903VO0291	11/1/2018	12/31/2018	2	6,061,186	6146
TN9038F0024	1/1/2019	2/28/2019	2	7,122	N/A
TN9038FR318	2/1/2019	2/28/2019	1	1,503	N/A
TN903AF0140	1/1/2019	2/28/2019	2	804,772	N/A
TN903DV0033	1/1/2019	2/28/2019	2	37,766	50

FUNDING INCREMENT NUMBER	FIRST DAY OF TERM	LAST DAY OF TERM	CONTRACT TERM	BUDGET AUTHORITY	UNITS
TN903VO0292	1/1/2019	2/28/2019	2	5,852,395	6146
TN903VO0293	3/1/2019	3/31/2019	1	2,926,198	6146
TN903AF0141	3/1/2019	4/30/2019	2	799,916	N/A
TN903VO0294	4/1/2019	4/30/2019	1	2,926,198	6146
TN903AF0142	5/1/2019	5/31/2019	1	399,958	N/A
TN903VO0287	6/1/2018	5/31/2019	12	17,569	3
TN903VO0295	5/1/2019	5/31/2019	1	2,926,198	6146
TN9038F0025	3/1/2019	6/30/2019	4	11,622	N/A
TN9038F0026	1/1/2019	6/30/2019	6	19,996	N/A
TN903DV0034	3/1/2019	6/30/2019	4	78,104	50
TN9038FR418	7/1/2019	7/31/2019	1	1,591	N/A
TN903VO0298	8/1/2019	8/31/2019	1	153,648	N/A
TN9038F0027	7/1/2019	9/30/2019	3	8,928	N/A
TN9038F0029	7/1/2019	9/30/2019	3	4,999	N/A
TN903AF0143	6/1/2019	9/30/2019	4	1,138,929	N/A
TN903DV0035	7/1/2019	9/30/2019	3	63,410	50
TN903VO0296	6/1/2019	9/30/2019	4	13,047,879	6149
TN903AF0144	10/1/2019	10/31/2019	1	284,732	N/A
TN903VO0297	10/1/2019	10/31/2019	1	3,075,430	6149
TN903VO0300	11/1/2019	11/30/2019	1	41,518	N/A
TN9038F0028	10/1/2019	12/31/2019	3	8,928	N/A
TN9038F0030	10/1/2019	12/31/2019	3	4,999	N/A
TN903AF0145	11/1/2019	12/31/2019	2	650,998	N/A
TN903AFR319	12/1/2019	12/31/2019	1	86,375	N/A
TN903DV0037	10/1/2019	12/31/2019	3	62,429	50
TN903VO0299	11/1/2019	12/31/2019	2	6,150,856	6149
TN9038F0031	1/1/2020	2/29/2020	2	5,872	N/A
TN903AF0146	1/1/2020	2/29/2020	2	650,998	N/A
TN903DV0032	3/1/2019	2/29/2020	12	452,997	99
TN903DV0038	1/1/2020	2/29/2020	2	39,474	50
TN903VO0301	1/1/2020	2/29/2020	2	4,787,270	6149
TN903VO0302	2/1/2020	2/29/2020	1	1,595,756	N/A
TN9038F0032	3/1/2020	3/31/2020	1	3,216	N/A
TN903AF0147	3/1/2020	3/31/2020	1	381,495	N/A
TN903DV0039	3/1/2020	3/31/2020	1	20,729	149
TN903VO0303	3/1/2020	3/31/2020	1	2,165,013	N/A
TN903VO0304	3/1/2020	3/31/2020	1	1,066,979	6149
TN9038F0033	4/1/2020	4/30/2020	1	3,216	N/A
TN903AFHV21	4/1/2020	4/30/2020	1	1,000	N/A
TN903AFR419	4/1/2020	4/30/2020	1	352,907	N/A

FUNDING INCREMENT NUMBER	FIRST DAY OF TERM	LAST DAY OF TERM	CONTRACT TERM	BUDGET AUTHORITY	UNITS
TN903DV0040	4/1/2020	4/30/2020	1	21,776	149
TN9038F0035	5/1/2020	5/31/2020	1	8,568	N/A
TN903AF0148	4/1/2020	5/31/2020	2	762,990	N/A
TN903AF0151	5/1/2020	5/31/2020	1	984,496	N/A
TN903VO0305	4/1/2020	5/31/2020	2	6,464,726	6149
TN903VOPR19	5/1/2020	5/31/2020	1	820	N/A
TN9038F0034	5/1/2020	6/30/2020	2	7,018	N/A
TN903AF0149	6/1/2020	9/30/2020	4	1,577,442	N/A
TN903DV0041	5/1/2020	9/30/2020	5	114,815	149
TN903VO0306	6/1/2020	9/30/2020	4	13,085,035	6149
TN903AF0150	10/1/2020	10/31/2020	1	394,361	N/A
TN903DV0042	10/1/2020	10/31/2020	1	22,963	149
TN903VO0307	10/1/2020	10/31/2020	1	3,240,531	6149

Tennessee Housing Development Agency (THDA)

Providing Meaningful Access to Persons with Limited English Proficiency Policy

Purpose: To ensure THDA's compliance with Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968 (the "Fair Housing Act") and Executive Order 13166 by providing meaningful access to THDA's programs, services and activities to persons with limited English proficiency.

Effective Date: November 11, 2019

Application: This policy applies to all programs, services or activities administered by THDA.

Policy Statement: THDA is committed to providing timely, meaningful access to persons with Limited English Proficiency (LEP) to programs, services, and activities administered by THDA. THDA complies with all applicable Federal and state laws and enabling regulations to ensure meaningful access for LEP persons.

Responsibility: Each THDA employee is responsible for providing timely, meaningful access to LEP persons.

Recipients (and sub-recipients) of Federal funding must appoint a Title VI Coordinator. The Civil Rights Compliance Advisor serves as THDA's Title VI Coordinator and oversees language access activities, complaints, and the Language Access Plan (LAP).

Guidance: To ensure meaningful access to THDA's programs, services and activities for LEP persons, THDA will complete a Language Access Plan (LAP) at least every five years that includes a "four-factor analysis," as recommended by federal guidance. The Plan outlines recommended language assistance services based upon the results of the four-factor analysis. The LAP is posted to the THDA website on the Fair Housing pages.

Public Notice: THDA will display a Language Identification Guide in a visible area of office locations that are open to the public. The Guide notifies the public of the availability of free language assistance translated into the 25 languages where interpretation is most commonly requested in the United States. THDA will also include a notice of free language assistance on vital program documents in the Spanish language, which was identified through THDA's Four Factor Analysis as the most frequently spoken language by LEP persons in Tennessee.

Employee Language Access Training: THDA will train all staff on the requirement to provide meaningful access and will train staff who engage in direct contact with the public on the proper procedures for specific language assistance services.

Discrimination Complaints (National Origin and Language Access): Any applicant to, or beneficiary of, a THDA funded program who alleges discrimination based upon race, color, religion, creed, national origin (including language access), sex, familial status, age, disability or any other protected class has the right to file a complaint no later than 180 days after the alleged discrimination. The complaint procedures may be found in *THDA's Grievance Procedures for Complaints of Discrimination by Applicants or Beneficiaries of THDA's Programs*. The procedures to file a complaint and a Discrimination Complaint form are made publicly available on THDA's website.

The Civil Rights Compliance Advisor tracks and coordinates discrimination complaints, including those related to limited English proficiency and meaningful access (national origin discrimination). The Division of Internal Audit conducts internal investigations into allegations of discrimination under this policy. In some cases, a complaint of discrimination may be investigated by the Tennessee Human Rights Commission (THRC). In those cases, the Civil Rights Compliance Advisor will coordinate internal actions with the THRC, THDA Internal Audit Division and the Office of Legal Counsel.

The Executive Director oversees any actions related to THDA employee conduct under this policy except those related to either himself/herself or to the Director of Internal Audit. If a complaint is lodged against the Executive Director or the Director of Internal Audit, then the THDA Board's Audit and Budget Committee is responsible for follow-up.

Sub-Recipients of THDA Federal Funds, National Origin Discrimination & Language Access: Sub-recipients of THDA's federal funding must comply with all federal and state laws in the same manner as THDA (the primary recipient). THDA will train sub-recipient administrators on the requirement to provide meaningful access to LEP persons and will monitor and evaluate sub-recipient compliance with Title VI, Fair Housing and other Federal and state regulations (including meaningful access for LEP persons).

Federal Non-Discrimination References:

1. *Title VI of the Civil Rights Act of 1964 (42 U.S. Code § 2000d)* prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal financial assistance.
2. *Title VIII of the Civil Rights Act of 1968, "The Fair Housing Act", (42 U.S. Code §§ 3601-19)* as amended in 1988, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, on the basis of race, color, national origin, religion, sex, familial status or disability. The Fair Housing Act applies to all housing activities and dwellings, except as exempted (*42 U.S. Code 3603 § 803 §§ b & c; 42 USC 3607 § 807 §§ a & b*).
3. *Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, (65 Fed. Reg. 50121)*, issued on August 11, 2000, requires each federal agency

to take steps to ensure that eligible persons with limited English proficiency are provided meaningful access to all federally-assisted and federally-conducted programs and activities.

Enabling Regulations:

- Department of Justice (June 18, 2002), 67 FR 41455- Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons
- Department of Energy Department of Energy (DOE), (August 16, 2004), 69 CFR 157, “Nondiscrimination in Federally Assisted Programs Enforcement of Title VI of the Civil Rights Act of 1964--Prohibition Against National Origin Discrimination affecting Persons With Limited English Proficiency (LEP); Policy Guidance.”
- HUD (January 22, 2007), 72 FR 2732- Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons
- DHHS (August 30, 2000), 65 FR 52762- Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons

State Non-Discrimination References: *Tennessee Human Rights & Disability Act (§ Tennessee Code Annotated, Title 4, Chapter 21)* prohibits discrimination related to employment, housing, and public accommodations on the basis of race, creed, color, religion, national origin, sex, age or disability. The THRA applies to all housing activities and dwellings, except as exempted (TCA-4-21-602).

The Tennessee Human Rights Commission (THRC) is charged with the responsibility of verifying that all state governmental entities that are recipients of Federal financial assistance comply with its requirements.

Other THDA Policies & References:

- THDA Language Access Plan
- THDA Procedures for Providing Oral Interpretation Services to Persons with Limited English Proficiency (LEP)
- Division Policy and Procedure Manuals

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.

THDA Employee 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.

Contractor/Sub-Recipient Consequences: Any sub-recipient/grantee who fails to comply with the obligation to provide meaningful access to LEP persons shall face loss of funding or other consequences as determined by the contract with THDA.

Policy Changes: This policy is subject to modification, amendment or revocation by the Executive Director at any time and for any reason.

Approved by:



Ralph M. Perrey, Executive Director

11/1/13

Date



Language Access Plan 2020-2025

I. Introduction

Executive Order 13166, (August 11, 2000), "Improving Access to Services for Persons with Limited English Proficiency," requires Federal agencies to examine the services they provide, identify any need for services to those with Limited English Proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. In response to the Executive Order, the Department of Justice (DOJ) issued guidance to recipients of Federal financial assistance on June 18, 2002 and established the compliance standards that recipients must follow to ensure that their programs and activities are accessible to LEP persons; and thus, do not discriminate on the basis of national origin.

On September 15, 2016, the Office of General Counsel (OGC) issued Guidance on Fair Housing Act Protections for Persons with Limited English Proficiency. In that Guidance, the OGC states that the Fair Housing Act prohibits housing providers from using LEP selectively based on a protected class or as a pretext for discrimination because of a protected class. The Act also prohibits housing providers from using LEP in a way that causes an unjustified discriminatory effect.

The Tennessee Housing Development Agency (THDA) is a recipient of Federal financial assistance and operates a variety of housing programs. THDA has prepared this Language Access Plan (LAP) to outline the actions necessary to ensure meaningful access to THDA's programs and to eliminate or reduce LEP as a barrier to receipt of services offered by THDA, in particular those programs and activities funded with Federal financial assistance, while not imposing an undue cost burden on the agency.

II. Policy

Access to THDA's programs and services should not be hindered by an individual's inability to speak, read, write or understand English. THDA will follow federal guidance and take reasonable, timely steps to provide LEP persons meaningful access to its programs and activities. The DOJ and subsequent Department of Housing and Urban Development (HUD) guidance recommend completing a four-factor self-assessment based on the factors below to determine the extent of an agency's obligations to provide LEP services and to determine the reasonable steps for providing meaningful access.

1. Number or proportion of LEP persons served or encountered in the eligible service population (served or encountered includes those persons who would be served by the recipient if the person received education/outreach and the recipient provided sufficient language services).
2. The frequency with which the LEP persons come into contact with the program;
3. The nature or importance of the specific activity, program, or service provided by the program;
4. Determining the resources available to execute the program(s), and the cost of providing the needed services, such as translated documents.

This Plan is based upon the most recent four-factor analysis completed by THDA. THDA will review and update its LEP four-factor analysis and LAP Plan at least every five years.

III. THDA's Programs & Funding Sources

Table 1 through Table 4 describe THDA's programs and divisions, identify when THDA direct administers a program (with or without direct public contact), grants funds to a sub-recipient or works in some capacity with a partner agency to carry out a program, and lists the funding source for each program and oversight agency (where applicable).

Table 1: Federally Funded Programs by Division

Division	Programs	Direct Public Contact	Sub Recipient/ Partner	Agency
Rental Assistance	-Housing Choice Voucher -Family Self Sufficiency	Yes Yes	No ¹ No	U.S. Dept. of Housing & Urban Development (HUD)
Contract Administration	Section 8 Project Based Rental Assistance	Yes ²	No	HUD
Community Programs	-Weatherization Assistance -Emergency Solutions Grant -HOME -National Housing Trust Fund - Low Income Home Energy Assistance -Hardest Hit Fund Blight Elimination	No No No No No No	Yes Yes Yes Yes Yes Yes	-U.S. Dept. of Energy -HUD -HUD -HUD -US Dept. Health & Human Services (HHS) -U.S. Dept. of Treasury

¹Housing Quality Standards inspections are conducted through a contract agency whose staff may have direct contact with participating landlords and tenants.

²Direct public contact for the Section 8 PBRA program is limited under THDA's contract with HUD to the intake of complaints and questions through a toll- free telephone helpline.

Table 2: Federally Enabled Programs by Division

Division	Programs	Direct Public Contact	Sub Recipient/ Partner	Agency
Multifamily Programs	Low Income Housing Tax Credit	No	No	Treasury/IRS
	Multifamily Tax Exempt Bond Authority	No	No	State of TN, Tax-Exempt Bond Authority
Single Family Loan Operations	-Great Choice Mortgage -Great Choice Plus Mortgage -Homeownership for the Brave -New Start	No No No No	No No No Yes	State of TN, Tax-Exempt Bond Authority
	-Homebuyer Education -Foreclosure Prevention	Yes Yes	Yes Yes	HUD, Treasury

Table 3: THDA Funded Programs by Division

Division	Programs	Direct Public Contact	Sub Recipient/ Partner
Community Programs	-Tennessee Housing Trust Fund	No	Yes
	-Capacity Building Gap	No	Yes
	-Appalachian Renovation Loan ¹	No	Yes
	-Tennessee Repair Loan	No	Yes
	-Appraisal Gap	No	Yes

¹Partnership with Appalachian Regional Commission (ARC)

Table 4: Other Programs/Activities by Division

Division	Programs	Direct Public Contact	Sub Recipient/ Partner
Community Programs	Community Investment Tax Credit	No	Yes
Volunteer Mortgage Loan Servicing (VMLS)	Loan Servicing	Yes	No

IV. Applicable Regulations

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d))
- Title VIII of the Civil Rights Act of 1968, the "Fair Housing Act," (42 U.S.C. §§ 3601-19)
- Tennessee Human Rights Act (Tenn. Code § 4-21-401)
- Executive Order 13166, (August 11, 2000), "Improving Access to Services for Persons with Limited English Proficiency"
- Department of Justice (DOJ), 67 FR 41455, (June 18, 2002), "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons"

Department level *enabling regulations* that apply to Federal programs administered by THDA:

- Department of Energy (DOE), 69 CFR 157, (August 16, 2004), "Nondiscrimination in Federally Assisted Programs Enforcement of Title VI of the Civil Rights Act of 1964--Prohibition Against National Origin Discrimination affecting Persons With Limited English Proficiency (LEP); Policy Guidance."
- Department of Health and Human Services, 67 FR 4968, (February 1, 2002), "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons ("Revised HHS LEP Guidance")"
- Department of Housing and Urban Development, 72 FR 2732, (January 22, 2007), "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons"
- Department of Housing and Urban Development, Office of General Counsel, (September 15, 2016), "Guidance on Fair Housing Act Protections for Persons with Limited English Proficiency"
- Department of Treasury, 70 FR 6067, (February 4, 2005), "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons"

V. Definitions

<i>Bi- or Multilingual employee</i>	A staff person or employee who has demonstrated fluency in English and competency in reading, writing, speaking, or understanding at least one other language.
<i>Limited English Proficient (LEP)</i>	Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English.
<i>National origin</i>	The country or region in which a person was born or from which his or her ancestors came. National origin discrimination is different treatment because of a person's ancestry, ethnicity, birthplace, culture or language.
<i>Beneficiary</i>	The ultimate consumer of federally funded programs who receives benefits from a federally funded recipient or sub-recipient.
<i>Bilingual</i>	A person who is bilingual is fluent in two languages and is able to conduct the business of the workplace in either of those languages. This is to be distinguished from proficiency in more than one language. Interpretation and translation require the interpreter or translator to be fluently bilingual and require additional specific skills for interpretation and translation.
<i>Fluent</i>	A person who is able to express oneself easily and articulately in conversations and public speaking.
<i>Interpretation</i>	The act of listening to something in one language (source language) and orally translating it into another (target language).
<i>Interpreter</i>	A person who translates spoken language orally with the proficiency in and ability to communicate information accurately in both English and in the other language, or in the case of a deaf or hard of hearing person, translates spoken language into visual gestures and signs.
<i>Language Assistance Services</i>	Oral and written language services needed to assist LEP individuals to communicate effectively with staff, and to provide LEP individuals with meaningful access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by THDA.
<i>Meaningful Access</i>	LEP individuals' accurate, timely, and effective participation in, or benefit from, federally funded programs that is meaningfully equivalent to that of non-LEP individuals, at no cost to the LEP individual.
<i>Proficient</i>	The ability of a person to speak, read, write, and understand a language.
<i>Qualified Translator or Interpreter</i>	An in-house or contracted translator or interpreter who has demonstrated his or her competence to interpret or translate
<i>Sub-recipient</i>	Any public or private agency, institution, organization, or other entity to whom federal financial assistance is granted, by THDA, for any program or activity, or who otherwise participates in carrying out such program or activity.
<i>Translation</i>	The replacement of written text from one language (source language) into an equivalent written text in another language (target language).
<i>Vital Document</i>	A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Any document for which either the following statements are true: 1) Without this document, an individual could not access the program; 2) This document allows access to a major activity within the program.

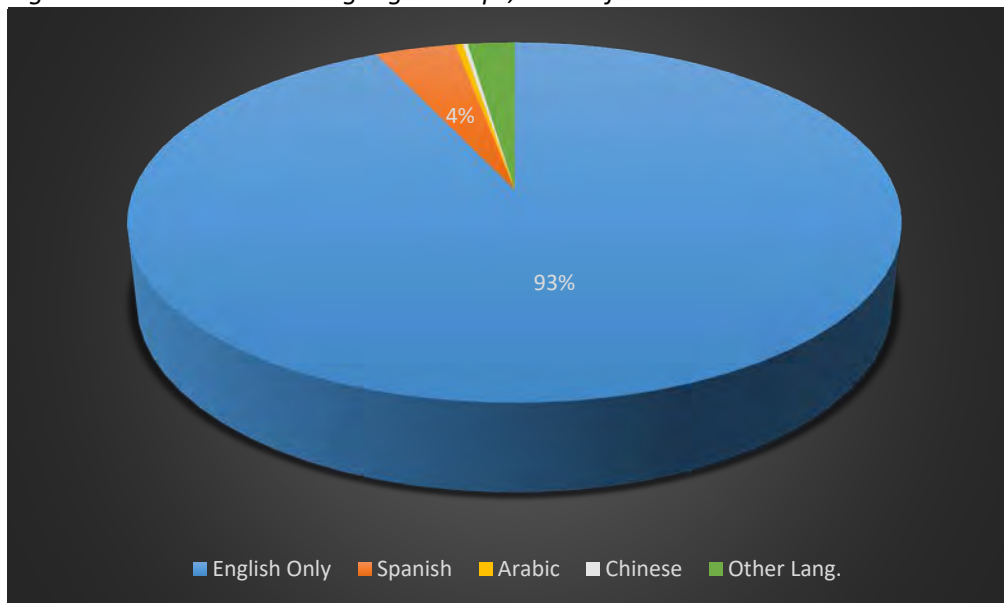
VI. Four Factor Assessment

HUD and DOJ guidance provide recipients of federal funds substantial flexibility in determining what language assistance is appropriate based on a local jurisdictional assessment of the four factors listed above in Section II. The following is an assessment of need in the State of Tennessee in relation to the four factors and the affordable housing programs administered by THDA. In general, the focus of THDA's four-factor analysis is on the needs of persons who are not proficient in English and not on persons who speak another language and speak English very well.

Factor 1: Number or Proportion of LEP persons, Tennessee

Using the U.S. Census, American Community Survey (5 year estimate, 2013-2017), at the state level, 93 percent of Tennesseans speak English. Four percent of Tennesseans speak Spanish. Arabic and Chinese are the third and fourth most common languages spoken (see Figure 1 below).

Figure 1: Most Common Language Groups, State of Tennessee



Source: U.S. Census, American Community Survey, B16001, 2013-2017

Table 5: Languages Most Commonly Spoken Statewide Other than English

Language	Total Population	Speak English Very Well	Speak English Less than Very Well	% Speak English Less than Very Well
<i>Spanish</i>	248,552	136,130	112,422	45.2%
<i>Arabic</i>	23,463	12,505	10,958	46.7%
<i>Chinese</i>	14,774	8,019	6,755	45.7%
<i>German</i>	12,233	10,732	1,501	12.3%
<i>French</i>	10,931	9,023	1,908	17.5%
<i>Vietnamese</i>	9,718	3,574	6,144	63.2%
<i>Korean</i>	8,417	4,404	4,013	47.7%
<i>Other Indo European</i>	8,323	5,558	2,765	33.2%
<i>Tagalong</i>	7,298	5,320	1,978	27.1%
<i>Thai, Lao, or other Tai-Kadai</i>	6,920	3,848	3,072	44.4%
<i>Amharic, Somali, or other Afro-Asiatic</i>	6,039	2848	3191	47.2%

Source: U.S. Census, American Community Survey, B16001, 2015, 5-year estimate

Note: ACS data on the Limited English Proficient (LEP) population rely on self-reporting of English proficiency, with LEP individuals counted as those who speak English less than “very well.”

While THDA is a state agency, most of its federally funded programs are administered on a county or local level, directly or through grants or contracts with sub-recipient agencies. Thus, a county level analysis of LEP is appropriate to determine where LEP is most prevalent among THDA’s service populations and to determine the most common language groups relevant to THDA’s jurisdiction.

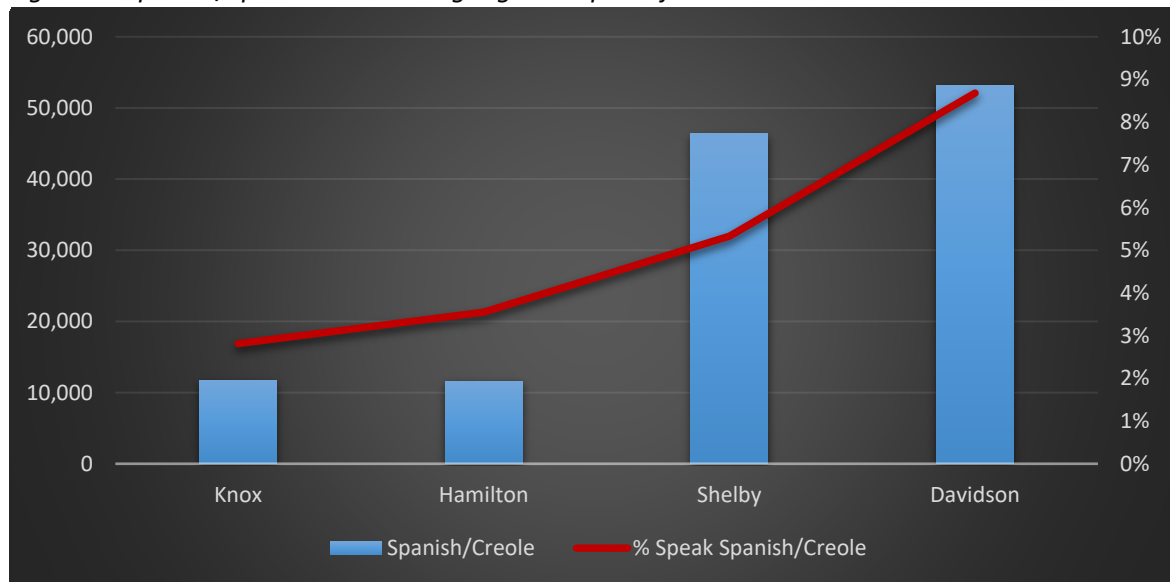
At the county level, other than English, Spanish is the most common language group in Tennessee. Thirty-four counties report more than 1,000 Spanish speakers (five years and older), with 20 counties reporting 1,000 or more Spanish speakers who speak English less than very well. Spanish is spoken by more than 5 percent of the population over age five in 11 counties. Davidson County has the largest number of Spanish speakers (53,165), and more than half speak English less than very well. Bedford County has the highest percentage of Spanish speakers per capita (10%), with more than half speaking English less than very well.

Table 6: Tennessee Counties with 1,000 or more Speaking Spanish or Spanish Creole

County	Total Population	Spanish or Spanish Creole	% Spanish or Spanish Creole	% Spanish or Spanish Creole who speak English less than "very well"
Anderson	71,453	1,432	2.0%	44%
Bedford	42,841	4,338	10.1%	58%
Blount	118,632	2,707	2.3%	40%
Bradley	96,273	4,123	4.3%	57%
Coffee	50,217	1,649	3.3%	48%
Crockett	13,745	1,109	8.1%	42%
Cumberland	54,661	1,147	2.1%	41%
Davidson	612,326	53,165	8.7%	53%
DeKalb	18,082	1,112	6.1%	47%
Greene	65,272	1,189	1.8%	48%
Hamblen	59,118	5,045	8.5%	53%
Hamilton	327,282	11,617	3.5%	53%
Jefferson	49,779	1,235	2.5%	49%
Knox	418,303	11,772	2.8%	45%
Loudon	47,705	3,162	6.6%	60%
McMinn	49,578	1,330	2.7%	44%
Madison	91,730	2,838	3.1%	30%
Maury	78,362	3,246	4.1%	41%
Monroe	42,661	1,345	3.2%	38%
Montgomery	169,994	9,136	5.4%	31%
Obion	29,382	1,015	3.5%	52%
Putnam	69,523	2,540	3.7%	62%
Rhea	30,690	1,057	3.4%	38%
Robertson	62,964	2,949	4.7%	55%
Rutherford	263,414	16,460	6.2%	36%
Sevier	88,418	3,755	4.2%	58%
Shelby	869,933	46,364	5.3%	46%
Sullivan	148,864	2,300	1.5%	30%
Sumner	159,247	5,896	3.7%	32%
Tipton	57,762	1,096	1.9%	51%
Warren	37,549	2,301	6.1%	58%
Washington	118,769	2,899	2.4%	27%
Williamson	187,400	6,007	3.2%	23%
Wilson	115,198	2,912	2.5%	40%

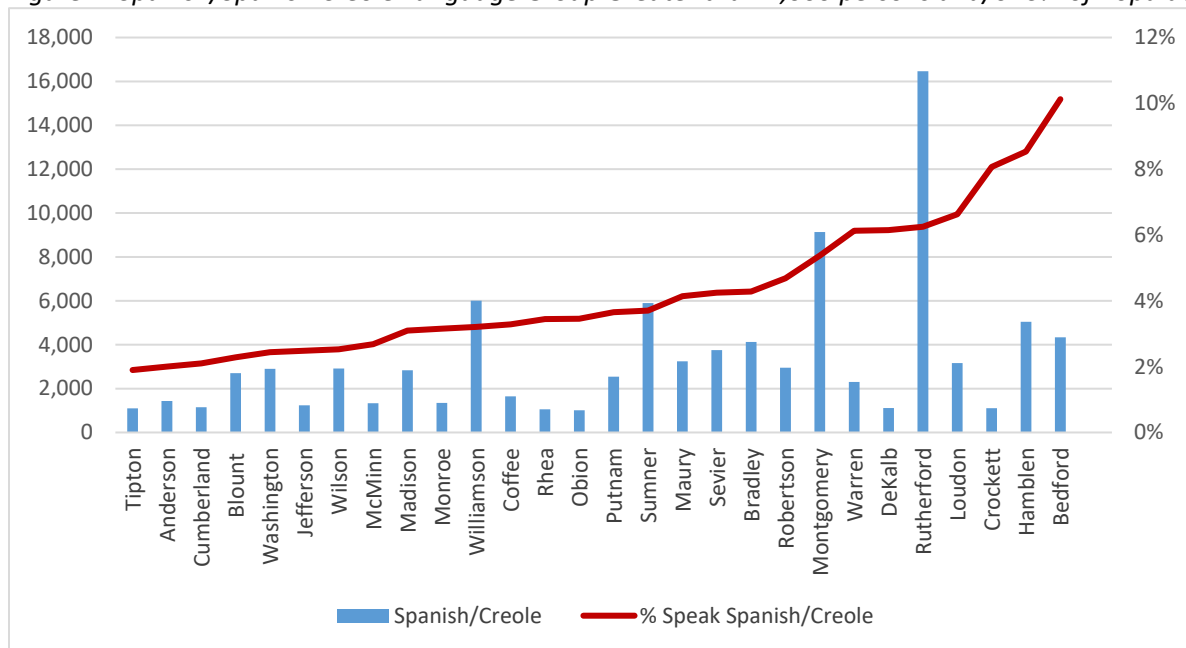
Source: U.S. Census, American Community Survey, B16001, 2015, 5 year estimate

Figure 3: Spanish/Spanish Creole Language Group- Major Metro Counties



American Community Survey, B16001, 2016, 5-year estimate

Figure 4: Spanish/Spanish Creole Language Group Greater than 1,000 persons and/or 5% of Population



American Community Survey, B16001, 2016, 5-year estimate

The counties in Tennessee with language groups, other than English or Spanish that exceed 1,000 persons, are primarily in a metropolitan statistical area (Davidson, Hamilton, Knox, Montgomery, Rutherford, Shelby and Williamson Counties). Davidson, Knox and Shelby Counties have the largest number of language groups other than English as shown in Table 4. In addition to the counties in Table 4, Hamilton and Montgomery have German language populations of more than 1,000, but English proficiency levels are high among this language group. Rutherford County has more than 3,000 Laotian speakers (about a third do not speak English very well) and more than 1,000 Arabic speakers (about half

do not speak English very well). Williamson County has more than 1,000 Chinese speakers (about a third do not speak English very well).

Table 7: Major Metro County Common Language Groups, other than Spanish

Language Group	Davidson	Hamilton	Knox	Shelby
Arabic	10828	n/a	n/a	3587
% Arabic	1.8%	n/a	n/a	0.4%
% LEP Arabic	54.5%	n/a	n/a	30.5%
Chinese	2030	919	2016	3374
% Chinese	0.3%	0.3%	0.5%	0.4%
% LEP Chinese	36.7%	46.2%	44.0%	47.9%
Korean	1345	n/a	n/a	1695
% Korean	0.2%	n/a	n/a	0.2%
% LEP Korean	58.5%	n/a	n/a	50.6%
Laotian	1714	n/a	n/a	n/a
% Laotian	0.3%	n/a	n/a	n/a
% LEP Laotian	49.8%	n/a	n/a	n/a
Vietnamese	2962	n/a	1401	4150
% Vietnamese	0.5%	n/a	0.3%	0.5%
% LEP Vietnamese	62.1%	n/a	77.8%	58.3%
African Languages, inc. Somali	5520	n/a	n/a	4577
% African	0.9%	n/a	n/a	0.5%
% LEP African Languages	34.6%	n/a	n/a	37.0%
French (incl. Patois, Cajun)	1758	n/a	1160	2846
% French (inc. Patios, Cajun)	0.3%	n/a	0.3%	0.3%
% LEP French (inc. Patios, Cajun)	19.9%	n/a	9.1%	24.4%
German	1096	1030	n/a	1452
% German	0.2%	0.3%	n/a	0.2%
% LEP German	14.8%	25.7%	n/a	7.4%
Persian	1541	n/a	n/a	n/a
% Persian	0.3%	n/a	n/a	n/a
% LEP Persian	48.2%	n/a	n/a	n/a
Hindi	1301	n/a	n/a	1308
% Hindi	0.2%	n/a	n/a	0.2%
% LEP Hindi	35.8%	n/a	n/a	12.6%
Tagalog	n/a	n/a	n/a	1588
% Tagalong	n/a	n/a	n/a	0.2%
% LEP Tagalong	n/a	n/a	n/a	28.3%

Source: U.S. Census, American Community Survey, B16001, 2015, 5-year estimate

According to the Metro Language Access report for Nashville/Davidson County, the most common non-English languages reported by Metro Nashville departments and extensions are (in order by most common to least): Spanish, Arabic, Kurdish, Somali, Burmese, and Vietnamese. Respondents to a community survey conducted as part of the report showed the most common languages spoken in Davidson County are Spanish, Arabic, Burmese, Kurdish, Nepali, and Somali.¹ The Memphis Metropolitan Planning Commission 2018 Limited English Proficiency Plan identified Spanish as the primary language group, other than English, in the Memphis metropolitan planning area, with 18,202 speaking Spanish who speak English less than very well.²

To further support the four-factor analysis, information from the Migration Policy Institute, which conducts evaluations of English Learners, was reviewed. According to their research, as of 2015-2016, 76 percent of English Learners (EL) in Tennessee spoke Spanish as their home language (based upon U.S. Department of Education reports). Arabic, Vietnamese, Somali, and Kurdish complete the top five home languages spoken by English Learners in Tennessee³. Further, the Tennessee Administrative Office of the Courts Court Interpreter Program, which tracks court interpreter usage, found the most widely used languages for interpreters in Tennessee courts in 2017 were (in descending order of usage): Spanish, Arabic, Other.⁴

Maps illustrating relevant trends within the different language groups in Tennessee are located in the Appendix at the end of this report.

Factor 2: THDA LEP Encounters

The more frequent the contact with a particular language group, the more likely that enhanced language services in that language are needed. An analysis of the most recent three years of oral interpretation requests for THDA's programs through our contracted telephonic interpretation service is displayed in Table 5.

Table 8: THDA All Divisions/Programs Language Line Requests, FYE 2017-2019

Spanish	Arabic	Haitian-Creole	Burmese/Zomi	Somali	Vietnamese	Cantonese	Total
720	29	2	3	6	1	1	762

¹ Metro Language Access Report, February 2017. Metro Human Relations Commission.
<https://www.nashville.gov/Portals/0/SiteContent/Human%20Realations%20Commission/docs/publications/MetroLanguageAccessStudy.pdf>

² Limited English Proficiency Plan, 2018. Memphis Planning Organization.
<https://memphismpo.org/sites/default/files/public/documents/title-vi/2018%20LEP%20Plan.pdf>

³ Julie Sugarman & Courtney Geary, August 2018, English Learners in Tennessee (Fact Sheet). Migration Policy Institute (National Center on Immigrant Integration Policy).

⁴ http://www.tncourts.gov/sites/default/files/docs/final_template_local_lap_july_2018.pdf

Factor 3- Importance of THDA Programs to Eligible LEP Population

The most likely points of contact between THDA and the LEP population are:

- (1) Persons seeking rental assistance, home repair or energy assistance through any of THDA's funded programs (direct or through sub-recipients) or assistance with loan servicing through THDA's Volunteer Mortgage Loan Servicing (VMLS);
- (2) Persons who reside in THDA funded affordable housing who have a question or problem with property ownership or management;
- (3) Persons seeking information on THDA's homeownership programs; homebuyer education or relief from foreclosure proceedings;
- (4) Citizens wishing to participate in the public comment or planning process for any of THDA's programs (particularly Con Plan and Housing Choice Voucher programs).

Many of THDA's programs require understanding detailed program procedures for successful access to and ongoing assistance. Reading documents, or having those documents read by a qualified interpreter, in a person's language of origin, especially when a person does not speak English very well, could make a positive difference in an LEP person's ability to access and succeed in a THDA program.

Factor 4 – THDA Resources

THDA will take all reasonable steps to ensure meaningful access for LEP persons to THDA programs and activities. The availability of resources; however, may limit the provision of language services in some instances. "Reasonable steps" may cease to be reasonable when the costs imposed substantially exceed the benefits. At this time, each THDA Division will independently fund language access services from its own allocated funding and will make and document decisions on the type of language assistance offered based upon departmental budgets and the cost of the language service.

When determining the most appropriate method of communicating program information, THDA divisions may consider jurisdictional, programmatic and financial circumstances. While THDA is a statewide agency, not all programs are administered in every county. Some THDA divisions administer or fund programs in an individual county where the number of LEP persons within a language group is significant, but the presence of that same language group may be insignificant in other counties where THDA programs operate. For example, there are a significant number of persons speaking Kurdish and Somali languages in Davidson County, but not in other parts of the state. Similarly, the Laotian language group is significant in Rutherford County, but not in other counties.

Four Factor Summary

Spanish is clearly the largest language group, other than English in Tennessee, with almost 250,000 persons speaking Spanish. Of that number, almost half speak English less than very well. Spanish, Arabic, Chinese, Vietnamese, Korean Thai/Lao and Somali are language groups with statewide populations exceeding 5,000 and with more than 40% of the population within those language groups speaking English less than very well (Table 3)⁵. Kurdish languages (Behdini and Sorani) and Somali are included as common language groups in the Metro Davidson County Language Access and the Migration Policy Institute reports. THDA has received the most interpretation requests for Spanish, Arabic, and Somali languages over the past three years. Therefore, it is determined that Spanish is the most commonly

⁵ U.S. Census reports

spoken language, other than English and is prevalent in counties throughout the state. Arabic, Chinese, Vietnamese, Korean, Laotian, Kurdish languages (Behdini & Sorani) and Somali are the most common language groups in Tennessee, other than English and Spanish. However, these language groups are primarily concentrated in specific major metro areas or counties.

The goal of THDA's LAP is to balance the needs of the statewide LEP community, who are eligible for and interested in participating in THDA's programs, with the funding and administrative resources available. To that end, THDA divisions will engage in a blend of methods to communicate with LEP persons to include:

- (1) Oral interpretation services will be provided for all languages spoken other than English.
- (2) A Spanish language tagline informing Spanish LEP persons of free language assistance will be included on all important documents and notices written in English.
- (3) Where determined administratively necessary or reasonable⁶ (by division), a tagline informing LEP persons of free language assistance will be included on important documents and notices written in English in Spanish and the other commonly spoken languages statewide (Arabic, Chinese, Vietnamese, Korean, Laotian, Kurdish languages (Behdini & Sorani) and Somali).
- (4) Public notices requesting public comment for federal programs will be translated into the most commonly spoken languages statewide (Spanish, Arabic, Chinese, Vietnamese, Korean, Laotian, Kurdish languages (Behdini & Sorani) and Somali).
- (4) Translation of vital documents into Spanish as determined necessary by Division.
- (5) Translation or oral interpretation of vital documents in other languages as needed based upon individual requests and program level reviews.

Priority for written translation services is given to programs with Federal funding where THDA has direct contact with the public.

VII. Language Assistance Services

A. Oral Language Services (Interpretation)

Interpretation services are offered free of charge to all LEP persons who seek information or assistance from THDA, regardless of the program or activity for which they seek information or assistance. Public-facing THDA employees have a Language Identification Guide ("I Speak" card) to assist with determining the language group for which interpretation is required. The "I Speak" card is also available on the THDA Intranet. The instructions for using oral interpretation services are maintained on the THDA employee Intranet. Public-facing employees receive periodic training on language access services.

1. Telephonic Interpretation

THDA offers telephonic interpretation through qualified language service providers contracted with the State of Tennessee for all LEP persons who need language assistance. It is the preferred method of providing interpretation services.

2. Bilingual and Multilingual staff

⁶ THDA divisions may take individual programmatic differences into consideration, such as if the service area for a particular program includes a county with more diverse language needs or if resources are limited, when determining whether to include the more comprehensive tagline.

THDA employees may be available to provide limited oral interpretation to determine the initial needs of a member of the public or beneficiary with LEP or to answer basic or standard questions. THDA employees do not provide formal interpretation unless their skill of interpreting in the language group of the LEP person is documented or certified.

3. *Use of Family Members or Friends as Interpreters*

THDA will not require but will permit beneficiaries to use an interpreter of their choice (whether a professional interpreter, family member, friend), at their own expense, in place of, or as a supplement to the free language services offered by THDA, with the exception of minor children. If a member of the public or beneficiary chooses to use their own interpreter, it will be documented through the THDA LEP Encounter Survey. For beneficiaries, the choice will be documented in their beneficiary file.

B. Written Notice of Language Assistance Services

1. Language Identification Guides, notifying the public of free language services in at least 25 of the most common languages spoken in the United States, are posted in visible locations in THDA reception areas that are open to the public.
2. A notice of free language assistance services translated into Spanish, Arabic, Chinese, Vietnamese, Korean, Laotian, Kurdish (Behdini and Sorani) and Somali languages will be added to THDA's website when feasible.⁷
3. A tagline notice informing LEP persons of the availability of free language assistance services translated into Spanish will be added to vital program documents and notices. The notice will include a phone number that is answered by a staff person (during business hours) trained in accessing oral language services.⁸
4. Where determined appropriate at the division level, a tagline notice in Spanish, Arabic, Chinese, Vietnamese, Korean, Laotian, Kurdish (Behdini and Sorani) and Somali will be added to vital program documents and notices. The notice will include a phone number that is answered by a staff person (during business hours) trained in accessing oral language services.

C. Translation of Written Materials

Translation of a vital document may be in written form or may be provided orally with an interpreter reading the document to the LEP person. Classification of a document as "vital" depends upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner. Individual divisions and programs at THDA determine what documents are "vital" in accordance with the definition contained in this Plan.

The below safe harbors (provided in Federal LEP guidance) guide decisions on when a language group is a large enough percentage of the eligible population to require consideration for translating vital documents.

⁷ THDA's current website platform does not allow for the inclusion of this type of notice. When THDA transitions to a new website platform, the notice will be added.

⁸ THDA will begin adding this notice to vital program documents during calendar year 2020 as determined administratively feasible.

Table 9: Federal Safe Harbors for Vital Document Translation⁹

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.

The Spanish speaking population exceeds the Federal safe harbor of more than 1,000 and/or 5 percent in more than 34 Tennessee counties. Statewide, among Spanish speakers, 45 percent speak English less than very well. Given the size of the Spanish language group in Tennessee and the percentage of LEP Spanish speakers, THDA will translate vital program documents into the Spanish language where a document is not available through other sources (i.e. a federal agency) and where translation is determined feasible and not administratively burdensome¹⁰. The other languages spoken most commonly by LEP persons in Tennessee, other than Spanish, represent a much smaller presence in the communities THDA's programs are administered and are encountered much less frequently by THDA staff.

Divisions and programs have identified the documents in Table 6 as vital documents that will be made available in the Spanish language (or are available in the Spanish language through a federal agency).¹¹ If a letter or document contains vital program information but includes a substantive amount of information that may vary by individual circumstances or case, a tagline notice of free language assistance will be included in the body of the document rather than full Spanish language translation. If language assistance is requested, oral interpretation of the letter or document will be provided.

⁹ Reference HUD guidance

¹⁰ One example of where translating a vital document may not be feasible is when a letter or document contains non-standard language, such as denial or termination notices, which have client specific information that may vary based upon circumstances.

¹¹ Where a document identified as vital is not already translated into Spanish, the agency will undertake efforts to translate the document(s) by the end of calendar year 2020 or end of fiscal year 2021 at the latest. Priority will be given to programs with Federal financial assistance.

Table 10: Vital Documents by Divisions/Programs

Division	Program & Funding Source	Vital Documents	Source of Translation
Rental Assistance	Housing Choice Voucher (federal)	<ul style="list-style-type: none"> • Pre Application • Personal Declaration • Authorization for the Release of Information/Privacy Act Notice • Voucher • Request for Tenancy Approval • Housing Assistance Payment Contract • Tenancy Addendum • "Protect Your Family from Lead in Your Home" • "A Good Place to Live" booklet • "Fair Housing for All" booklet • "Are you a Victim of Housing Discrimination?" booklet • Certification of Domestic Violence, Dating Violence or Stalking • Repayment Agreement • Debts Owed to PHAs • Denial and Termination of Assistance* 	THDA THDA HUD HUD HUD HUD HUD HUD HUD HUD HUD HUD THDA HUD THDA
Rental Assistance	Family Self Sufficiency (FSS) (federal)	<ul style="list-style-type: none"> • Contract of Participation • Escrow Account Credit Worksheet 	HUD HUD
Rental Assistance	Homeownership Voucher (federal)	<ul style="list-style-type: none"> • Statement of Homeowner Obligations 	HUD
Community Programs	Low Income Energy Assistance Program (federal)	<ul style="list-style-type: none"> • Application • Landlord Form • Zero Income Self Declaration 	THDA THDA THDA
Community Programs	Emergency Solutions Grant (federal)	<ul style="list-style-type: none"> • "Fair Housing for All" booklet 	HUD
Community Programs	Repair Programs (federal & state)	<ul style="list-style-type: none"> • Application • Disclosure 	THDA THDA
Community Programs	Weatherization (federal)	<ul style="list-style-type: none"> • Application 	THDA
Community Programs	Tennessee & Appalachian Renovation Loan Programs (state & federal)	<ul style="list-style-type: none"> • Combined Application • TRLP Note, Deed of Trust & Right of Recession • Applicant & Income Affidavit 	THDA THDA THDA THDA THDA

Table 10, Vital Program Documents by Divisions/Programs, cont.

Division	Program & Funding Source	Vital Documents	Source of Translation
Single Family Loan Operations	Great Choice Programs (state)	<ul style="list-style-type: none"> • Loan Subordinate Deed of Trust • Second Note- 30 Year • Disclosure of Loan Terms-30 Year • Application Affidavit • Seller Affidavit • Notice to Applicants-Federal Recapture • THDA Rider • GC-97 Mortgage Note 	THDA THDA THDA THDA THDA THDA THDA
Volunteer Mortgage Loan Servicing	Direct Loan Servicing (state)	<ul style="list-style-type: none"> • Notice of Default* • 30 day Notice* • 60 day Notice* 	THDA THDA THDA
Agency wide	Various	• Discrimination Complaint Form	THDA

*This document contains a substantive component that is non-standard language and that will vary based upon individual client circumstances. Therefore, a tagline notice of free language assistance will be included with the option for oral interpretation of the document.

If a vital document is not translated due to lack of resources, other administrative burden or another reason, the THDA program responsible for the document will keep a record of the justification and another type of language assistance, such as oral translation of the document, will be offered as needed.

D. Public Notices

Public notices requesting citizen input for programs with federal financial assistance will be posted to THDA's webpage and will be translated into Spanish, Arabic, Chinese, Vietnamese, Korean, Laotian Kurdish (Behdini and Sorani) and Somali. Summaries of Consolidated Planning documents, which primarily involve activities for our HUD formula grant programs will be provided in English and Spanish.

THDA will publish public notices on programs with Federal financial assistance in Spanish language newspapers, where available, and distribute to organizations who are known to serve the Spanish speaking population, to promote public participation among Spanish speaking persons.

Public notices published on THDA's website or on the THDA-sponsored site, TNHousingSearch.org, may be translated by the user through Google Translate technology. Therefore, the notice of free language assistance may not be included within the body of documents or notices published to these sites.

E. Deaf and Hard of Hearing Interpretation Services

THDA utilizes the Federal Communications Commission 711 for Telecommunications Relay Service, and posts that information on the THDA website and other public notices. TRS (711) is a free service that permits persons with a hearing or speech disability to use the telephone system via a text telephone (TTY) or other device to call any person or number.

THDA offers in person or video remote interpretation services for all persons who are deaf or hard of hearing and in need of interpretation services to allow full participation in an activity or program administered by the agency.

F. THDA Websites & TNHousingSearch.org

THDA maintains two websites located at <https://www.thda.org> and <https://vol servicing.com>. Both sites are equipped with Google Translate to allow for a basic translation of the information presented in more than 100 languages.

TNHousingSearch.org is a THDA-sponsored web-based, housing database that provides detailed information about available rental properties statewide. Public notices and housing related program information are also available on the site. The service can be accessed online at no cost 24 hours a day or through a toll-free, bilingual call center at 1-877-428-8844, available M-F, 9:00 am - 8:00 pm EDT. The information contained on the site is available in more than 100 languages, including those referenced in this plan. The current database is available through <http://www.tnhousingsearch.org>.

VIII. Training

THDA will train all staff on the requirement to provide meaningful access and will train staff who engage in direct contact with the public on the proper procedures for specific language assistance services. THDA will also train sub-recipient administrators on the requirement to provide meaningful access to LEP persons and will monitor and evaluate sub-recipient compliance with Title VI and Fair Housing regulations (including meaningful access for LEP persons). THDA maintains online training and information for sub-recipients, other partners and members of the public on non-discrimination and the obligation to ensure meaningful access for LEP persons.

IX. Complaints and Appeals

Any person who believes they have been denied the benefits of this LAP or that THDA has not complied with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 regulations may file a discrimination complaint as per THDA's discrimination complaint process. THDA maintains information about filing a complaint with THDA, including a link to the discrimination complaint form and contact information on the Title VI and Fair Housing pages of the website. Information about filing a complaint with HUD and THRC is also maintained on the same pages of the THDA website. Complaints may be submitted to:

THDA (www.thda.org/about-thda/file-a-complaint)

Andrew Jackson Building | Third Floor | 502 Deaderick St., Nashville, TN 37243

Or

Tennessee Human Rights Commission (www.tn.gov/humanrights/file-a-discrimination-complaint.html)

312 Rosa L Parks Avenue | 23rd floor Nashville, Tennessee 37243

Toll Free: (800)251-3589 | Phone: (615)741-5825

X. Sub-recipient Activities

Sub-recipients of THDA's federal funding are required to comply with Title VI, the Fair Housing Act and enabling regulations and to make reasonable efforts to provide timely, meaningful access for LEP persons to programs and activities. To ensure meaningful access, sub-recipients should first conduct a four-factor analysis an assessment to determine the need for language assistance within their service area. After completion of the Four-Factor Analysis, the sub-recipient will understand the languages spoken by LEP persons in their service area. Based upon the findings of a Four-Factor Analysis, and

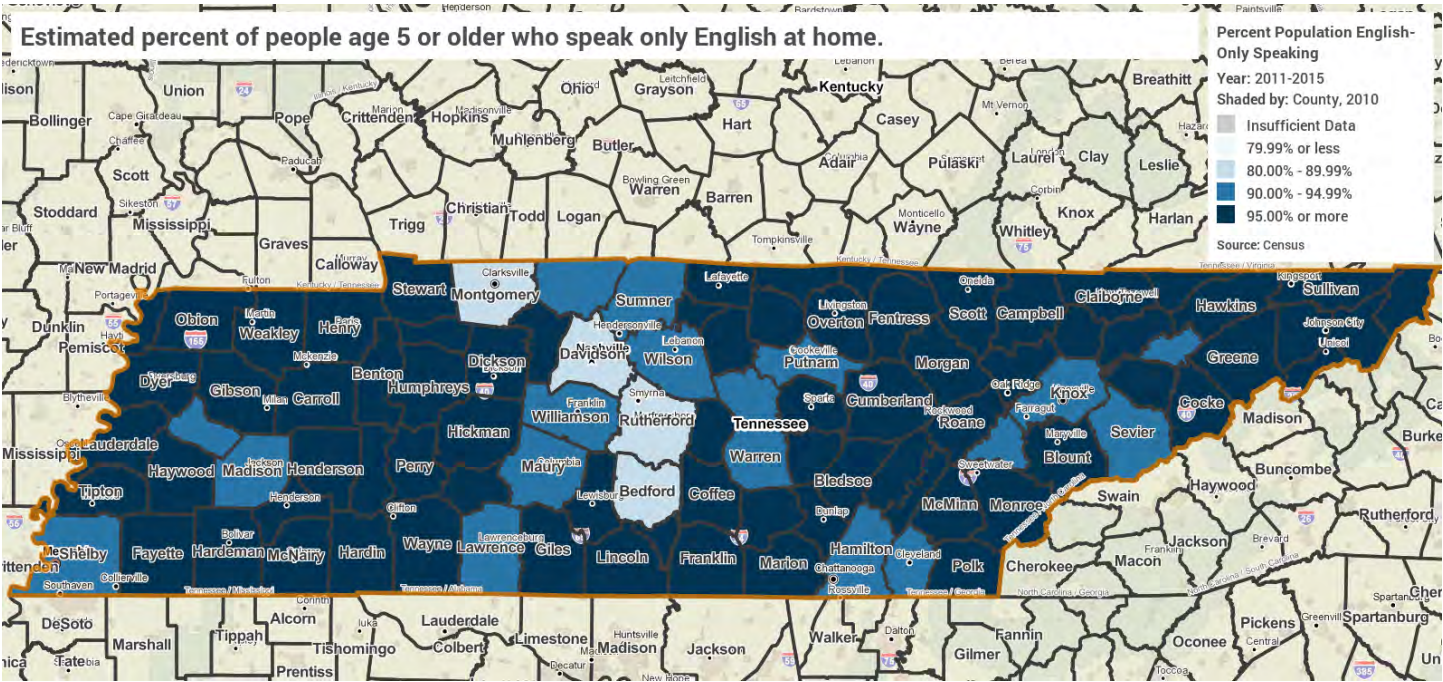
when deemed necessary, sub-recipients should prepare an LAP addressing the sub-recipient's plan for ensuring Meaningful Access to programs and activities for LEP persons.

The LAP plan should provide a reasonable balance between the scope and needs of the LEP population in the sub-recipient's service area, the cost of providing language services and the resources available to the agency. Ideally, the LAP Plan will include:

1. The title and/or name of the individual responsible for coordination of LEP compliance;
2. The language groups spoken by LEP persons served or encountered in the eligible service population identified from the Four Factor Analysis;
3. A plan for language services (oral interpretation and/or written translation) based on language assistance needs identified in the Four Factor Analysis;
4. A training plan on LEP requirements for all staff (and/or volunteers) involved in programs and activities funded by the federal government and awarded by THDA;
5. A schedule for translating and disseminating vital documents where applicable; and
6. A policy for updating the Four Factor Analysis and LAP.

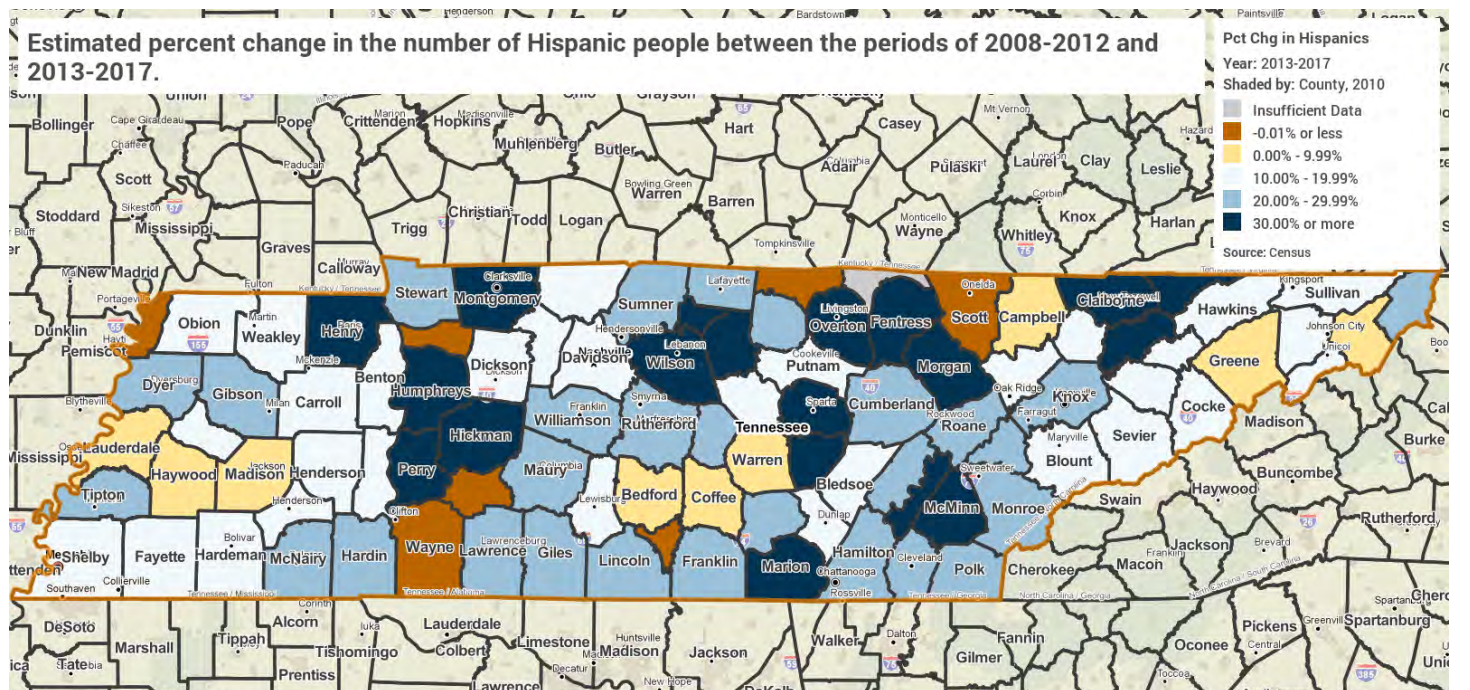
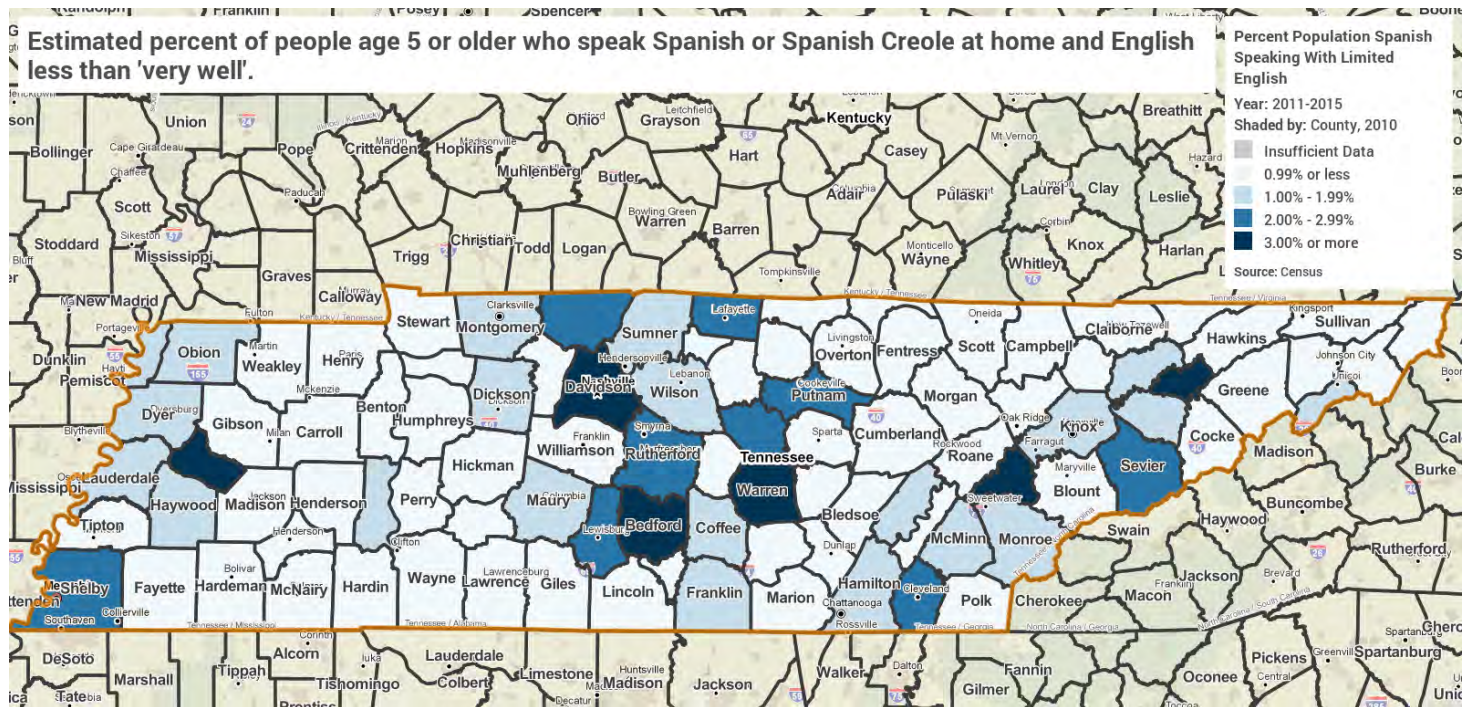
Sub-recipients also should maintain documents regarding efforts to comply with LEP requirements. Documentation should include: Notices to LEP persons of free language services, LEP services provided to eligible persons, evidence of compliance with their LAP, Four Factor Analysis at least every five years, and resolving any findings related to its LEP obligations by taking corrective action. THDA will monitor all sub-recipients to ensure LEP individuals receive meaningful access to federally funded programs in accordance with the appropriate federal guidance.

Appendix 1



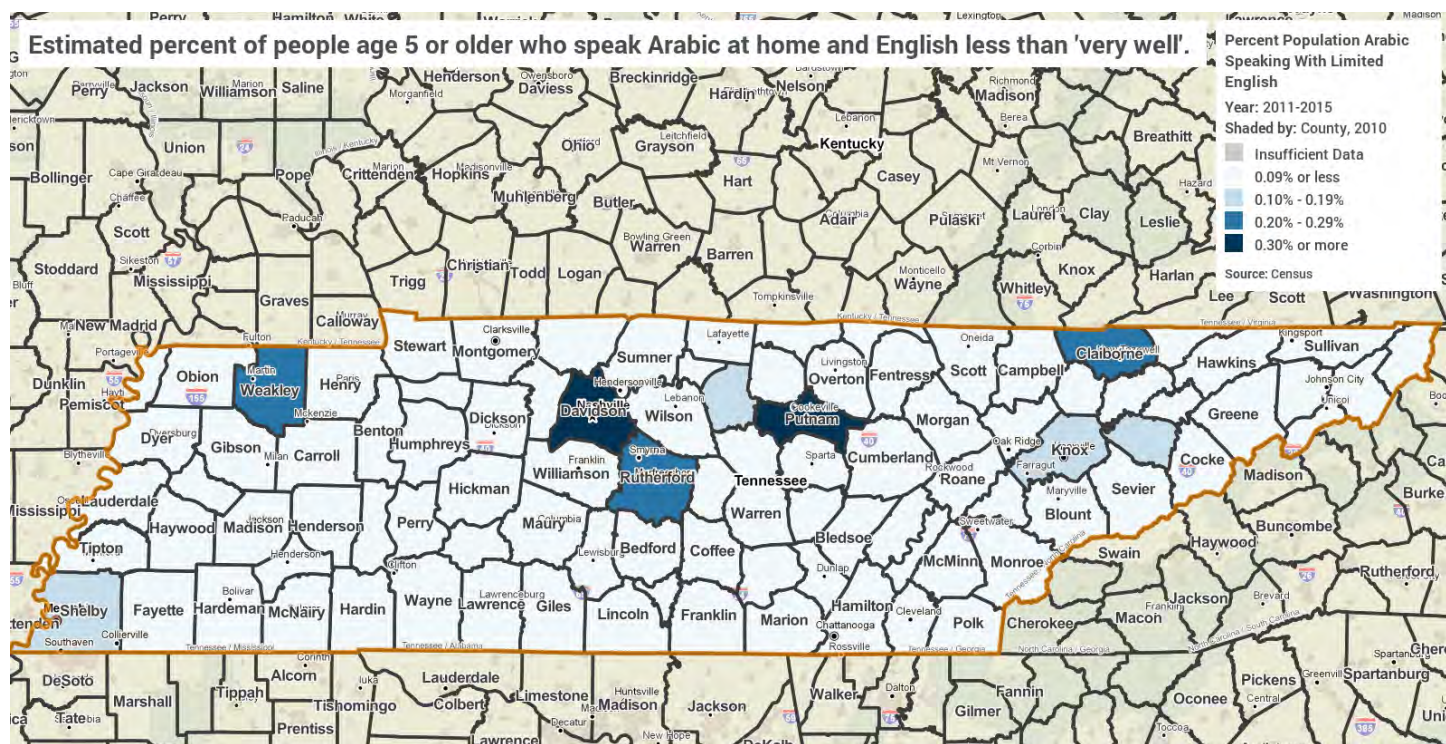
Source: PolicyMap, American Community Survey, 5-year estimate (2011-2015)

Appendix 2



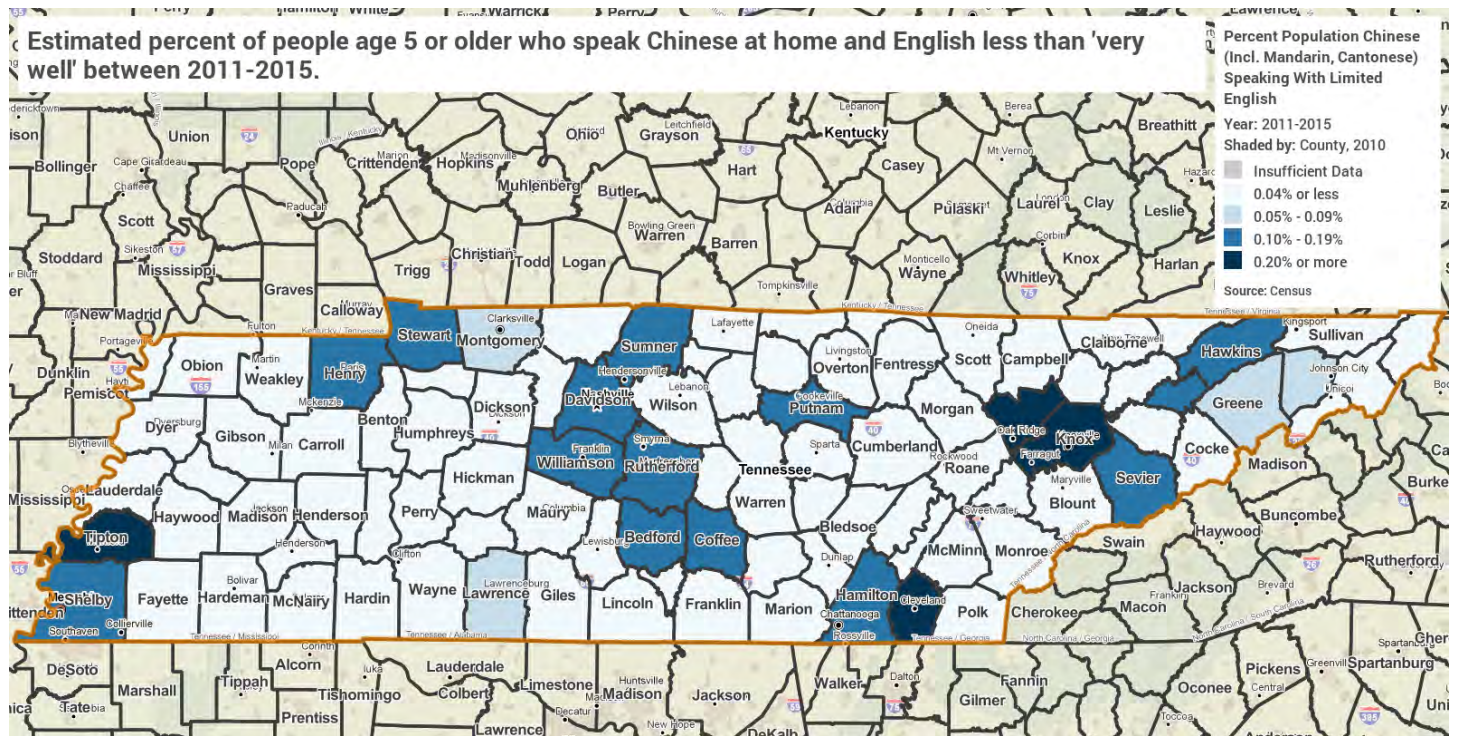
Source: PolicyMap, American Community Survey, 5-year estimates (2008-2012, 2011-2015, 2013-2017)

Appendix 3



Source: PolicyMap, American Community Survey, 5-year estimate (2011-2015)

Appendix 4



Source: PolicyMap, American Community Survey, 5-year estimate (2011-2015)

Tennessee Housing Development Agency

List of Bi- or Multi-Lingual Staff

Spanish

Cynthia Peraza, Community Programs Division

Jeboria Scott, Rental Assistance Division

Hillary Craig, Rental Assistance Division

Giulia Vernaschi, Volunteer Loan Servicing Division

Alba Jofre, Volunteer Loan Servicing Division

Karina Wells, Volunteer Loan Servicing Division

Yanisleidy Lopez, Volunteer Loan Servicing Division

Turkish

Hulya Arik, Research & Planning Division

List of Translated Documents

All of these documents may be found at:

https://hud.gov/program_offices/fair_housing_equal_opp/17lep

- HUD form 9886, Authorization for the Release of Information/Privacy Act Notice, Housing Choice Voucher Program (available in English, Spanish, Arabic, Chinese, Korean, Vietnamese)
- HUD form 52646, Voucher, Housing Choice Voucher Program (available in English, Spanish, Arabic, Chinese, Korean, Vietnamese)
- HUD form 52517, Request for Tenancy Approval, Housing Choice Voucher (available in English, Spanish, Arabic, Chinese, Korean, Vietnamese)
- HUD form 52641-a, Tenancy Addendum, Housing Choice Voucher (available in English, Spanish, Arabic, Chinese, Korean, Vietnamese)
- HUD form, Are you a Victim of Housing Discrimination? Booklet (available in English, Spanish, Arabic, Chinese, Korean, Vietnamese)
- HUD Fair Housing – Equal Opportunity for All booklet (available in English, Spanish, Arabic, Chinese, Korean, Vietnamese)
- HUD form 52650, FSS Contract of Participation (Spanish, Arabic, Chinese, Korean)
- HUD form 52649, HOV Statement of Homeowner Obligations (Spanish Arabic, Chinese, Korean)

These documents are THDA provided translations (copy in Appendix H):

- Notice of Free Language Assistance (Spanish, Arabic, Behdini, Chinese, Korean, Laotian, Somali, Sorani and Vietnamese)
- LIHEAP Application (Spanish)
- LIHEAP Zero Income Declaration (Spanish)
- LIHEAP Landlord Agreement form (Spanish)

Attention: This is an important document. If you speak a language other than English, assistance in your language is available, free of charge. Call 1-800-228-8432 (TRS: 7-1-1).

Atención: Esto es un documento importante. Si habla un idioma además de inglés, asistencia en su idioma está disponible, sin costo. Llame al 1- 800-228-8432 (TRS: 7-1-1).

1- 800-228-8432 ١- ٨٠٠-٢٢٨-٨٤٣٢. مجاناً متوفرة لغك في المساعدة فإن، الإنجليزية غير لغة تتكلم كنت إذا. هامة الوثيقة هذه: ملاحظة (TRS: 7-1-1).

Feejignaan: Kan waa dukumentiyi muhiim ah. Haddii aad ku hadasho luuqad aan af Ingiriis ahayn, waxaad heli kartaa caawimaad dhanka luqaddaada ayaan kuu diyaarinay, oo waana bilaash. Soo wac 1-800-228-8432 (TRS: 7-1-1).

注意：这是一份重要文件。如果您使用的语言不是英语，我们可以为您提供免费的语言帮助，请致电 1-800-228-8432 (TRS: 7-1-1)。

주의: 이 문서는 중요한 문서입니다. 영어 외 다른 언어를 구사하시는 경우, 귀하의 언어로 된 도움을 무상으로 받으실 수 있습니다. 다음으로 전화하십시오 1-800-228-8432 (TRS: 7-1-1).

Lưu ý: Đây là tư liệu quan trọng. Nếu quý vị không nói tiếng Anh, chúng tôi có nguồn trợ giúp bằng ngôn ngữ của quý vị miễn phí. Vui lòng gọi số 1-800-228-8432 (TRS: 7-1-1).

زمانی ب ئالیکاری ورتیشاندان، یفیدپه نگلیسی نه زمانی بلی ژ کی زمانه ب تورگه نه. گرینگه ک له گه بی لگه به فی روکانافه: تیپینی. تیکلیی فیه بکه 1- 800-228-8432 (TRS: 7-1-1) ژماراهه لدگه. سته ده ربه ل پیدراف ولاش به کی ئاوايه ب ته تیکلداری.

شیوهی به ئیوه زمانی به یارمه تی ورتیوتی، ده که ن قسه ئینگلیزی زمانی بیجگه زمانیک به نه گهر. گرنگه به لگه نامه یه کی نه مه: تیپینی. بکه ن په یوه ندی 1-800-228-8432 (TRS: 7-1-1) ژماره ی به. به رده سته له خوړای.

ຖ້າທ່ານເວົ້າພາສາອື່ນທີ່ບໍ່ແມ່ນພາສາອັງກິດ, ມີການຊ່ວຍເຫຼືອທາງດ້ານພາສາບໍ່ເສຍຄ່າໃຫ້. ໂທຫາ 1-800-228-8432 (TRS: 7-1-1).

Fecha en la que se completa la solicitud:

Asistencia de energía Asistencia de crisis

☐ Sí ☐ No

En caso afirmativo, ¿qué agencia le proporcionó asistencia? _____

Dirección principal	Ciudad o pueblo	Estado	Código postal	Condado

Primer nombre	Inicial	Apellido
---------------	---------	----------

Teléfono principal	Teléfono secundario	Correo electrónico (opcional)
--------------------	---------------------	-------------------------------

Dirección postal (si es diferente de la anterior)	Ciudad o pueblo	Estado	Código postal	Condado

☐ Adultos) sin niño ☐ Otro _____

¿Tiene un certificado médico firmado que indica que alguien en su hogar necesita equipo de soporte vital? ☐ Sí ☐ No

1. La solicitud con toda la información
2. Identificación emitida por el gobierno del jefe del hogar
3. Un registro de miembro del hogar por cada miembro del hogar, incluyendo al jefe del hogar
4. Una hoja de detalles de ingresos por cada miembro del hogar mayor de 18 años de edad
5. Verificación de Número del Seguro Social de todas las personas en el hogar. *Se denegará la asistencia si un solicitante se niega a presentar los números del seguro social y la verificación de todos los miembros del hogar*
6. Documentación sobre ingresos (recibos de sueldo, etc.)
7. Documentación sobre el consumo de energía anual

Solicitud de Asistencia LIHEAP Nombre del jefe del hogar: _____

Hoja de información del miembro del hogar (utilice hojas adicionales si es necesario)

Nota: Se denegará la asistencia si un solicitante se niega a presentar los Números del Seguro Social y la verificación de todos los miembros del hogar.

Cantidad de miembros en el hogar: _____

Primer nombre	Inicial	Apellido
Género	Fecha de nacimiento	Número del Seguro Social

Relación con el hogar: ☐ Jefe del hogar ☐ Cónyuge ☐ Hijo ☐ Niño en adopción temporal ☐ Nieto ☐ Hijo adulto
☐ Padre/madre ☐ Abuelo/a ☐ Otra relación ☐ Sin relación

Raza (seleccione una): ☐ Blanco ☐ Negro/afroamericano ☐ Asiático ☐ Indio americano/nativo de Alaska
☐ Nativo de Hawái/otro ☐ Islas del Pacífico ☐ Multirracial ☐ Otra _____

¿Hispano/latino? ☐ Sí ☐ No

Ciudadanía: ☐ Nacido en EE.UU./naturalizado ☐ Residente legal que califica ☐ Rediente legal que no califica ☐ Residente indocumentado

Empleo (si es mayor de 18 años): ☐ Tiempo completo ☐ Tiempo parcial ☐ Jubilado ☐ Busca trabajo ☐ Desempleado
(seleccione una) ☐ No disponible ☐ Otro _____ ☐ No corresponde

¿Tiene seguro médico? ☐ Sí ☐ No

Educación (si es mayor de 18 años): ☐ 0-octavo grado ☐ Noveno-doceavo grado ☐ Graduado secundaria/GED
☐ No es graduado de secundaria/GED ☐ Más de doceavo grado y algo de educación postsecundaria
☐ Graduado universitario 2 o 4 años ☐ Graduado universitario 4 años

Discapacidad: ☐ Sí ☐ No *En caso afirmativo, si necesita asistencia para completar esta solicitud o participar adecuadamente en el programa, informe inmediatamente al empleado de la agencia para poder brindarle asistencia.*

Veterano o miembro activo de las FF.AA.: ☐ Sí ☐ No

Primer nombre	Inicial	Apellido
Género	Fecha de nacimiento	Número del Seguro Social

Relación con el hogar: ☐ Jefe del hogar ☐ Cónyuge ☐ Hijo ☐ Niño en adopción temporal ☐ Nieto ☐ Hijo adulto
☐ Padre/madre ☐ Abuelo/a ☐ Otra relación ☐ Sin relación

Raza (seleccione una): ☐ Blanco ☐ Negro/afroamericano ☐ Asiático ☐ Indio americano/nativo de Alaska
☐ Nativo de Hawái/otro ☐ Islas del Pacífico ☐ Multirracial ☐ Otra _____

¿Hispano/latino? ☐ Sí ☐ No

Ciudadanía: ☐ Nacido en EE.UU./naturalizado ☐ Residente legal que califica ☐ Rediente legal que no califica ☐ Residente indocumentado

Empleo (si es mayor de 18 años): ☐ Tiempo completo ☐ Tiempo parcial ☐ Jubilado ☐ Busca trabajo ☐ Desempleado
(seleccione una) ☐ No disponible ☐ Otro _____ ☐ No corresponde

¿Tiene seguro médico? ☐ Sí ☐ No

Educación (si es mayor de 18 años): ☐ 0-octavo grado ☐ Noveno-doceavo grado ☐ Graduado secundaria/GED
☐ No es graduado de secundaria/GED ☐ Más de doceavo grado y algo de educación postsecundaria
☐ Graduado universitario 2 o 4 años ☐ Graduado universitario 4 años

Discapacidad: ☐ Sí ☐ No *En caso afirmativo, si necesita asistencia para completar esta solicitud o participar adecuadamente en el programa, informe inmediatamente al empleado de la agencia para poder brindarle asistencia.*

Veterano o miembro activo de las FF.AA.: ☐ Sí ☐ No

Nombre del jefe del hogar: _____

Nombre del miembro del hogar: _____

Hoja de Detalles de Ingresos (adjunte una hoja por miembro del hogar, más de una si es necesario)

Nota: Debe informar sobre todas las fuentes de ingresos, a excepción de los ingresos de empleo de los miembros del hogar menores de 18 años

Ingresos: ¿Este ingreso es actual? ☐ Sí ☐ NoTipo de ingresos: ☐ Pensión alimenticia/manutención de menores ☐ Pensión ☐ Salario/sueldo ☐ Seguro Social ☐ SSDI ☐ SSI
☐ TANF/AFDC ☐ Desempleo ☐ Sin ingresosPeríodo de ingresos: ☐ Semanal ☐ Bisemanal ☐ Bimensual ☐ Mensual ☐ Trimestral ☐ Anual

Monto bruto por período de ingresos: _____

Tipo de documentación proporcionada: _____

Detalles del empleador

Nombre del empleador	Dirección	Ciudad	Estado	Código postal	Duración del empleo

Ingresos: ¿Este ingreso es actual? ☐ Sí ☐ NoTipo de ingresos: ☐ Pensión alimenticia/manutención de menores ☐ Pensión ☐ Salario/sueldo ☐ Seguro Social ☐ SSDI
☐ SSI ☐ TANF/AFDC ☐ Desempleo ☐ Sin ingresosPeríodo de ingresos: ☐ Semanal ☐ Bisemanal ☐ Bimensual ☐ Mensual ☐ Trimestral ☐ Anual

Monto bruto por período de ingresos: _____

Tipo de documentación proporcionada: _____

Detalles del empleador

Nombre del empleador	Dirección	Ciudad	Estado	Código postal	Duración del empleo

Ingresos: ¿Este ingreso es actual? ☐ Sí ☐ NoTipo de ingresos: ☐ Pensión alimenticia/manutención de menores ☐ Pensión ☐ Salario/sueldo ☐ Seguro Social ☐ SSDI
☐ SSI ☐ TANF/AFDC ☐ Desempleo ☐ Sin ingresosPeríodo de ingresos: ☐ Semanal ☐ Bisemanal ☐ Bimensual ☐ Mensual ☐ Trimestral ☐ Anual

Monto bruto por período de ingresos: _____

Tipo de documentación proporcionada: _____

Detalles del empleador

Nombre del empleador	Dirección	Ciudad	Estado	Código postal	Duración del empleo

--Adjunte más hojas según sea necesario para documentar los ingresos--

Nota: Debe informar sobre todas las fuentes de ingresos, a excepción de los ingresos de empleo de los miembros del hogar menores de 18 años

Detalles de la solicitud de LIHEAP

Nombre del jefe del hogar: _____

Fuente(s) de energía: ☐ Leña ☐ Electricidad ☐ Fueloil ☐ Carbón mineral ☐ Querosén ☐ Gas natural ☐ Gas L.P.

Costos de energía del hogar:

Arrendatarios de viviendas públicas/Sección 8 únicamente

\$ _____

Monto de "excedente" de servicios públicos \$ _____

Compañía de servicios públicos o de energía que recibirá el pago:
Nombre de la compañía de servicios públicos:
Dirección de la compañía de servicios públicos:
Teléfono:
Número de cuenta:

Compañía de servicios públicos o de energía adicional:
Nombre de la compañía de servicios públicos:
Dirección de la compañía de servicios públicos:
Teléfono:
Número de cuenta:

Adjunte la documentación de consumo de energía anual.

Certifico que la(s) cuenta(s) anterior(es) a nombre de _____

(últimas 4 cifras del SSN) _____ relación _____ es/son para uso de mi hogar y que soy responsable de sus pagos.

¿Es esta una cuenta a nombre de su arrendador? ☐ Sí ☐ No¿Su hogar recibió alguna vez los servicios de nuestro Programa de Asistencia para Aclimatación? ☐ Sí ☐ No¿Le interesa dicho programa? ☐ Sí ☐ No

Si solicita asistencia de crisis, díganos el motivo en el espacio a continuación:

¿Le desconectaron la electricidad o el gas? ☐ Sí ☐ No ¿Recibió un aviso de desconexión? ☐ Sí ☐ No

Si recibió un aviso de desconexión, adjunte una copia a esta solicitud.

Certificación del solicitante Certifico que toda la información que proporcioné es verdadera y correcta. Comprendo que toda persona que oculta de forma fraudulenta un hecho material o que brinda información falsa a sabiendas para recibir asistencia LIHEAP puede ser condenado a una multa de \$10,000 o cárcel de un máximo de cinco años, o ambos. Autorizo la verificación de toda la información que proporcioné en el presente para determinar mi elegibilidad, y certifico que recibí información sobre el proceso de apelación conforme a las disposiciones del Programa de Asistencia de Energía del Hogar por Bajos Ingresos. Certifico bajo pena de perjurio que todas las personas que solicitan o que reciben asistencia son ciudadanos de los Estados Unidos o extranjeros que califican tal como se define en 8 USC § 1641(b), o inmigrantes que califican. Comprendo que recibiré información por escrito sobre mi estado de elegibilidad. La información de identificación que usted proporcionó para determinar si califica para LIHEAP y para la provisión de los servicios del programa se considerará confidencial, a menos que la ley autorice o exija lo contrario, y no se compartirá con ninguna otra persona ni agencia excepto para fines directamente relacionados con la administración del programa (LIHEAP). Soy el cliente en los registros, el agente autorizado del cliente o un tercero autorizado de la cuenta de servicios públicos que se identifica en esta solicitud, y autorizo a mi proveedor de servicios públicos a divulgar mis datos de cliente tal como lo solicite la agencia que administra LIHEAP. Acepto _____ o no acepto _____ que la información incluida en mi solicitud se pueda compartir con otras agencias a las cuales solicito servicios adicionales.

Firma del solicitante: _____ Fecha: _____

No se excluirá la participación, no se rechazarán los beneficios ni se someterá a discriminación de otra manera en el funcionamiento del programa LIHEAP de ninguna persona en base a raza, color, origen nacional, sexo, edad, discapacidad, ancestros, condición de veterano o ninguna otra característica protegida por la ley federal, estatal o local.

Para ser completado exclusivamente por el personal de la agencia (To be completed by agency staff only)

Nivel de beneficios elegible \$ _____ Ingresos brutos anuales totales para todos los miembros del hogar mayores de 18 años \$ _____ No. de comprobante: _____

Fecha/hora en que se tomó: _____

Fecha/hora en la que se informó al proveedor: _____

Estado de la solicitud: ☐ Aprobada ☐ Denegada

% de pobreza: _____

Puntos totales: _____

Firma del funcionario revisor de la agencia: _____

Fecha de certificación: _____

ACUERDO DE ASISTENCIA DE ENERGÍA ENTRE ARRENDADOR/ARRENDATARIO LIHEAP

Se debe utilizar este formulario si se incluye una factura de energía de un cliente LIHEAP en el costo del alquiler pagado a su arrendador.

Nombre del arrendador: _____

Nombre del arrendatario: _____

Dirección de la propiedad de alquiler: _____

Alquiler mensual total: \$ _____ Costos de energía mensuales: \$ _____

No. de cuenta de factura de energía: _____ **(incluya una copia de la factura de energía)**

Certificación del arrendador

Acepto reducir el alquiler del arrendatario al monto que excluye el costo de la energía hasta que se haya agotado el beneficio aprobado. Una vez que se haya agotado el beneficio aprobado, se restablecerá el monto de alquiler normal del arrendatario que incluye el costo de la energía. Si por algún motivo el arrendatario se muda o es desalojado antes de que se agoten los fondos, la parte restante será devuelta a la agencia local que administra LIHEAP.

Firma del arrendador: _____

Fecha: _____

Firma del arrendatario: _____

Fecha: _____

Autodeclaración de ingresos nulos

Fecha de solicitud: ____/____/____

Yo, _____, certifico que los siguientes miembros del hogar
(Nombre del solicitante en letra de molde)

mayores de 18 años de edad tienen ingresos nulos:

Nombre: _____ declara ingresos nulos en un plazo de 30 días de la
fecha de solicitud que se indica más arriba.Nombre: _____ declara ingresos nulos en un plazo de 30 días de la
fecha de solicitud que se indica más arriba.Nombre: _____ declara ingresos nulos en un plazo de 30 días de la
fecha de solicitud que se indica más arriba.Nombre: _____ declara ingresos nulos en un plazo de 30 días de la
fecha de solicitud que se indica más arriba.Nombre: _____ declara ingresos nulos en un plazo de 30 días de la
fecha de solicitud que se indica más arriba.**Nota: En este formulario debe incluir a todos los miembros del hogar que autodeclaran ingresos nulos, aun si alguien en el hogar cuenta con ingresos. Debe adjuntar las cartas de desvinculación laboral actuales a este formulario firmado.****Certifico que la información anterior es correcta. Falsificar y/u ocultar información de ingresos es un delito federal que puede recibir una condena de una multa de \$10,000 o cárcel de un máximo de cinco años, o ambos, conforme a las leyes del Estado de Tennessee.**

Firma del solicitante: _____

Fecha: _____

**Se Pide Comentarios de la Comunidad:
Viviendas y Desarrollo Comunitario en Tennessee**

La Agencia del Desarrollo de Viviendas de Tennessee ha completado un borrador del Informe de Desempeño y Evaluación Anual Consolidado (Consolidated Annual Performance and Evaluation Report, CAPER) sobre el Plan Consolidado de Tennessee 2015-19 para los programas CDBG, ESHG, HOME, HOPWA, y Fondo Fiduciario de Viviendas (HTF). Este informe anual al HUD describe cómo fondos federales fueron gastados en actividades que beneficiaron a residentes de ingresos bajos y moderados, además de otras actividades de viviendas y desarrollo comunitarios a lo largo del estado. Se animan a los ciudadanos a que revisen y hagan comentarios sobre la información contenida en el informe. El borrador del CAPER está disponible para revisión y comentarios públicos en <https://thda.org/about-thda/public-notice-and-comment> a partir del 4 de septiembre de 2019. Un resumen del borrador en inglés y español también estará disponible. Se aceptan comentarios escritos vía presentación electrónica en el sitio web de THDA del 4-19 de septiembre de 2019.

Además, THDA invita a todos los residentes de Tennessee a participar en una encuesta de vivienda equitativa, abierto hasta el 4 de octubre de 2019. Versiones de la encuesta en inglés y español están disponibles en <https://www.surveymonkey.com/r/FairHousingTN>.

Por favor envíe solicitudes de acomodaciones a Research@thda.org.

Haga clic aquí para español.

التعليقات المطلوبة من الجمهور المحلي: تنمية الإسكان والمجتمع المحلي في تينيسي

لقد إنتهت "وكالة تينيسي لتنمية الإسكان" (THDA، Tennessee Housing Development Agency) من العمل على مسودة "التقرير السنوي الموحد للأداء والتقييم" (CAPER، Consolidated Annual Performance and Evaluation Report) المتعلق بخطة تينيسي الموحدة 2015-2019 لبرامج CDBG وESG وHOME وHOPWA و"صندوق إئتمان الإسكان" (HTF، Housing Trust Fund). وهذا التقرير المقدم سنوياً لـ "وزارة الإسكان والتنمية الحضرية" (HUD، Department of Housing and Urban Development) يصف كيف تم إنفاق الأموال الفدرالية على أعمال تقيد السكان ذوي الدخل المتدني والمعتدل، وكذلك غيرها من أعمال تنمية الإسكان والمجتمع المحلي عبر الولاية. ونحث المواطنين على الإطلاع على المعلومات المتضمنة في التقرير وتقديم التعليقات عليها. ومسودة تقرير CAPER متوفرة لإطلاع وتعليق الجمهور العام عليها على <https://thda.org/about-thda/public-notice-and-comment> ابتداءً من 4 سبتمبر/أيلول 2019. كما ستكون مسودة خلاصة باللغتين الإنجليزية والإسبانية متوفرة. وسيتم القبول بالتعليقات الخطية عبر تقديمها إلكترونياً على موقع إنترنت وكالة THDA ابتداءً من 4-19 سبتمبر/أيلول 2019.

وبالإضافة إلى ذلك، تدعو وكالة THDA جميع سكان تينيسي إلى المشاركة في إستطلاع للإسكان المنصف حتى 4 أكتوبر/تشرين الأول 2019. والنسخ الإنجليزية والإسبانية من الإستطلاع متوفرة على <https://www.surveymonkey.com/r/FairHousingTN>.

ويرجى إرسال طلبات التسهيلات إلى Research@thda.org.

داخوازا پاشفہگرا نانکو فیدبہکا جفاکی:
گہشاتیا مال و جفاکی ل تنیسئی

ریخستنا گہشاتیا مالان نا تنیسئی (THDA) پیشنفیسا راپورا ہفہدودانیا خیمات و نرخاندنا سالی (CAPER) دہرباری ہرنامہیا تہلفیق نانکو ہفہدودانیا تنیسئی 2015-19 ژبو ہرنامہیین CDBG، ESG، HOME، HOPWA و سندوقا سرمیاندانینا مالان (HTF) نامادہ کریہ. نمف راپورا سالانہ ژ HUD را شروفہ دکہ کو بوودجہیا فہدہمال چاوا ژبو وان چالاکیان ہاتہ تہرخانکرن کو ل سہر خیرا نشتہجہین کیم دہرہات و ب دہرہاتا نافگین و ہس و ہا چالاکیین دیکہ یین گہشاتیا مال و جفاکی د تہفایا پاریزگہہی دا بوویہ. ولاتی تین ہاندان کو زانیاریین ہہی د راپوری دا ہلکولینن و نیرینا خوہ ل بارا وان بیژن. پیشنفیسا (CAPER) ژبو ہلکولاندن و دہربرینا گہلمہپہری د نادرسا <https://thda.org/about-thda/public-notice-and-comment> دا ژ پروژا 4 ٹیلون (سمتہمہس) 2019 و پنفہ دی بکفہ ہس دہست. پیشنفیسا کورتکری ب زمانی ٹہنگلیسی و سپانیایی ژ دی بکفہ ہس دہست. نیریین نفیسکی ژ ریا شاندنا ٹہلمکترونیکی د مالپہرا THDA ژ 4 ہمتا 19 ٹیلون 2019 دی وہرن و مرگرتن.

ہس و ہا THDA ژ تہفایا نشتہجہین تنیسئی دخوازہ کو ہشداری راپرسینا مالاب دادمہندی کو ہمتا 4 جوتہمہ (نوکتوبہر) 2019 ل ہس دہستہ، بن. نوسخمیین ٹہنگلیسی و سپانیایی یین فی راپرسین د نادرسا ژیری ل ہس دہستن:
<https://www.surveymonkey.com/r/FairHousingTN>

ژ کمرما خوہ داخوازین تیکلداری مالی بشینن فی نادرسی: Research@thda.org.

**Jaaliyadda Jawaab-celin ayaa laga Codsaday:
Guryaynta iyo Horumarinta Jaaliyadda ee Tennessee**

Hay'adda Horumarinta Guryaha ee Gobolka Tennessee (Tennessee Housing Development Agency, THDA) way dhammaystirtay qaybo qoraalka gunaanadkii Waxqabadka Sanadlaha ee la Isugeeyay iyo Warbixintii Qiimaynta (Consolidated Annual Performance and Evaluation Report (CAPER) ee 2015-19 Qorshihii Isugaynta ee Gobolka Tennessee kaas oo loogu talagalay CDBG, ESG, HOME, iyo barnaamijyada Maal-gelinta ee Housing Trust Fund (HTF). Warbixinta sannadlaha ah ee HUD waxay sharrax ka bixineysaa sida miisaaniyadda dowladda dhexe loogu kharash gareeyay howlaha loogu faa'ideeyo dadka daqligoodu yar yahay iyo kuwa dhexdhexaadka ah ee guryaha degan iyo sidoo kale howlaha kale ee gurynta iyo howlaha horumarinta bulshada ee gobolka oo dhan ka jira. Muwaadiniinta waxaa lagu dhiirigelinayaa inay dib u fiiriyaan oo wixii ra'yi ama faallo ahna ay ka bixiyaan macluumaadka ku jira warbixinta. Qabyo qoraalka 'CAPER' waxaa laga heli karaa oo dad-weynaha faallo uga bixin karaan iyadoo booqda bartan <https://thda.org/about-thda/public-notice-and-comment> laga bilaabo 4 ta bisha Sebtember, 2019. Qabyo qoraalkan oo kooban oo ku qoran af Ingiriisi iyo af Isbanish ayaa sidoo kale la heli doonaa. Faallooyinka qoraallada waxaa lagu soo diri karaa iyadoo la soo marinayo oo ku soo diraya qaab elegtaroonig ah oo ku soo dir bogga internetka ee THDA waxaad soo gudbin kartaa laga bilaabo Seteember 4-19, 2019.

Waxaa intaa dheer, THDA waxay ku martiqaadeysaa dhammaan dadka degan gobolka Tennessee inay ka qeybqaataan sahanka ama rayi ururintan ku saabsan guryaynta caddaaladda oo furan illaa 4 ta Oktoobar, 2019. Rayi ururintan ama sahankan oo ku qoran af Ingiriis iyo af Isbaanish waxaa laga heli karaa <https://www.surveymonkey.com/r/FairHousingTN>.

Fadlan codsiyada isku hagaajinta ku soo dir Research@thda.org.

داواکاری کار دانمە/فیدبەکی کۆمەڵایەتی:
پەرەپێدانی خانووبەرە و کۆمەڵگا لە تێنێسی

رێکخراوی پەرەپێدانی خانووبەرە لە تێنێسی (THDA) رەشەنۆسی راپۆرتی تیکەڵکردنی کار و ھەڵسەنگاندنی سالاھە (CAPER) سەبارەت بە گەژاڵە تیکەڵکردنی تێنێسی 2015-19 بۆ بەرنامەکانی HUD، CDBG، ESG، HOME، HOPWA و سندوقی وەبەرھێنانی خانووبەرە (HTF) نامادە کردووە. ئەم راپۆرتە سالاھە بۆ HUD شەرقە دەکات کە بۆدجە فیدرال چۆن بۆ ئەو چالاکیانە تەرخان کراوە کە بە قازانجی دانێشتووانی کەم داھات و لەمەڵ داھاتی نیوونجی و ھەروەھا چالاکیەکانی تری پەرەپێدانی خانووبەرە و کۆمەڵگا لە ھەمووی ویلايەتەکاندا بوو. ھاوواتییان ھان دەدرێن کە زانیاری ھەبوو لە راپۆرتەکاندا تۆتۆ بکەن و سەبارەت بەو بیرورایان دەربەرن. رەشەنۆسی CAPER لەبۆ تۆتۆکردن و رادەربەرنی گشتی لە ناوێشان [https://thda.org/about-](https://thda.org/about-thda/public-notice-and-comment) [thda/public-notice-and-comment](https://thda.org/about-thda/public-notice-and-comment) لە 4 سێتەمبەری 2019 بە داوای بەر دەست دەبێت. کورتە رەشەنۆسە بە زمانی ئینگلیزی و سپانیایی لە بەر دەست دەبێت. بیرورا نووسراوەکان لە رێگای ناردنی ئەلێکترۆنیکی لە مایەری THDA لە 4 یۆ 19 ی سێتەمبەری 2019 قبوڵ دەکەن.

ھەروەھا، THDA لە ھەموو دانێشتووانی تێنێسی داوێت دەکات کە لە راپرسی خانووبەرە دادپەروەرانه کە تا 4 یۆکتۆبەری 2019 لە بەر دەستە بەشداری بکەن. وەشانە ئینگلیزی و سپانیاییەکی ئەم راپرسییە لە ناوێشان خوارە ودا لە بەر دەستن: <https://www.surveymonkey.com/r/FairHousingTN>.

تکایە داواکاریەکانی پێوندیدار بە خانووبەرە بۆ ئەم ناوێشانە بنێرن: Research@thda.org.

**Mong nhận Ý kiến Phản hồi của Cộng đồng:
Phát triển Nhà ở và Cộng đồng tại Tennessee**

Cơ quan Phát triển Nhà ở Tennessee (THDA) đã hoàn thành bản thảo Báo cáo Đánh giá và Hiệu suất Hàng năm Hợp nhất (CAPER) trong Kế hoạch Hợp nhất Tennessee 2015-19 cho các chương trình CDBG, ESG, HOME, HOPWA và Quỹ Ủy thác Nhà ở (HTF). Đây là báo cáo thường niên cho HUD mô tả cách các quỹ liên bang chi tiêu cho các hoạt động có lợi cho cư dân có thu nhập thấp và trung bình cũng như các hoạt động phát triển cộng đồng và nhà ở khác trên toàn tiểu bang. Người dân được khuyến khích xem xét và đưa ra nhận xét về thông tin có trong báo cáo. Quý vị có thể xem xét và nhận xét công khai dự thảo CAPER tại <https://thda.org/about-thda/public-notice-and-comment> bắt đầu từ ngày 4 tháng 9 năm 2019. Bản tóm tắt dự thảo bằng tiếng Anh và tiếng Tây Ban Nha cũng sẽ có sẵn. Ý kiến bằng văn bản gửi qua mạng trên trang web THDA sẽ được chấp nhận từ ngày 4 đến 19 tháng 9 năm 2019.

Ngoài ra, THDA mời tất cả cư dân Tennessee tham gia vào cuộc khảo sát nhà ở công bằng mở ra đến ngày 4 tháng 10 năm 2019. Bản khảo sát bằng tiếng Anh và tiếng Tây Ban Nha có sẵn tại <https://www.surveymonkey.com/r/FairHousingTN>.

Vui lòng gửi yêu cầu chỗ ở đến Research@thda.org.



Encuesta sobre equidad de la vivienda para residentes de Tennessee

Disponible para todos los residentes de Tennessee
Responder antes del 4 de octubre de 2019

La equidad y asequibilidad de la vivienda nos atañe a todos. La Agencia de Desarrollo de la Vivienda de Tennessee (THDA), y sus asociados están realizando un estudio respecto a la equidad de la vivienda en Tennessee y quisieran escuchar sus experiencias.

Escanee el código QR o visite los enlaces antes del 4 de octubre de 2019.
También puede acceder a la encuesta en el sitio web de la THDA.



Español: https://www.surveymonkey.com/r/FairHousingTN?lang=es_US

Inglés: <https://www.surveymonkey.com/r/FairHousingTN>

Comuníquese con Research@THDA.org si tiene alguna pregunta o necesita alguna modificación.



ESTADO DE TENNESSEE
RESUMEN EJECUTIVO DEL INFORME CONSOLIDADO SOBRE EL RENDIMIENTO Y EVALUACIÓN ANUAL (CAPER)
PARA EL AÑO FISCAL 2018-19

El Informe Consolidado sobre el Rendimiento y Evaluación Anual (CAPER) sirve como el informe de rendimiento anual del Estado de Tennessee al Departamento de Vivienda y Desarrollo Urbano de los EE.UU. (HUD) para cinco programas de subvención de fórmula; el Programa de Subvenciones en Bloque para Desarrollo Comunitario de Ciudades Pequeñas (CDBG), el Programa de Asociación de Inversiones HOME (HOME), el Programa de Subvenciones de Soluciones de Emergencia (ESG), el Programa de Fondos Fiduciarios para la Vivienda (HTF), y el Programa de Oportunidades de Vivienda para Personas con SIDA (HOPWA). El período de informes para el Año Fiscal (FY) 2018-19 CAPER es del 1 de julio 2018 al 30 de junio de 2019.

Los nombres de los programas de subvención, las agencias estatales administrativas, y los gastos para el Año Fiscal 2018-2019 son como siguen:

- Programa de Subvenciones en Bloque para Desarrollo Comunitario de Ciudades Pequeñas (CDBG) administrado por el Departamento de Desarrollo Económico y Comunitario de Tennessee (ECD), \$29,159,102
- Programa de Asociación de Inversiones HOME (HOME) administrado por la Agencia de Desarrollo de Vivienda de Tennessee (THDA), \$7,334,824
- Programa de Subvenciones de Soluciones de Emergencia (ESG) administrado por la THDA, \$3,179,778
- Programa de Fondos Fiduciarios para la Vivienda (HTF), administrado por la THDA, \$8,661,685
- Programa de Oportunidades de Vivienda para Personas con SIDA (HOPWA) administrado por el Departamento de Salud de Tennessee (DOH), \$1,211,150

Además de discutir los recursos disponibles al Estado de Tennessee en el Año Fiscal 2018-19 mediante los cinco programas de subvención de fórmula, este documento informa el rendimiento del Estado de Tennessee al cumplir las metas y pasos de acción contenidos en el Plan Consolidado 2015-19 y evalúa el rendimiento general del estado al cumplir con las metas de viviendas asequibles.

El Estado contrató con Western Economic Services para realizar el Análisis de Impedimentos (AI) a la Elección de Vivienda Justa para las jurisdicciones de no-subsidio del estado. El Análisis fue la culminación de foros públicos, cuestionarios, análisis de datos, y otros comentarios públicos en cuanto a asuntos de vivienda justa a lo largo del estado. El informe identifica impedimentos a los sectores privados y públicos junto con acciones recomendadas. El estado ha desarrollado actividades para abordar los hallazgos contenidos en el AI y ha desarrollado un Plan Intensivo de Vivienda Justa para superar los impedimentos. El boceto más reciente del Plan de Vivienda Justa fue publicado en el Plan de Acción Anual del Año Fiscal 2019-20 y se incluye en este CAPER del Año Fiscal 2018-19. Estas actividades abordan los impedimentos identificados e indican el compromiso de los Socios Consolidados para adelantar afirmativamente vivienda justa en Tennessee. El AI está disponible en los sitios de web de la THDA y el ECD.

Si bien la THDA ha sido designada como la agencia principal para los requisitos de planeamiento consolidado de Tennessee, todas de las agencias administrativas de los cinco programas de subvención de fórmula participan en el desarrollo del CAPER y la administración de sus programas respectivos. El CAPER para el Año Fiscal 2018-19 representa la cooperación de estas agencias para adelantar vivienda asequible y desarrollo comunitario en Tennessee. Además, se desarrolla el plan consultando a los ciudadanos de nuestro estado. El boceto del plan está a disposición para verlo y hacer comentarios públicos según las pautas desarrolladas por el Plan Consolidado de cinco años.

Estado de Tennessee Plan Consolidado de 2020-2024 Resumen Ejecutivo

El Departamento de Vivienda y Desarrollo Urbano de EE. UU. (HUD) requiere que el Estado de Tennessee, como receptor de fondos de subvenciones federales, desarrolle un Plan Consolidado cada cinco años. Este Plan describe las prioridades del estado en cuanto a desarrollo comunitario y de vivienda y sus metas plurianuales, en base a una evaluación de necesidades para dicho desarrollo, un examen de las condiciones económicas y de vivienda del mercado, y un análisis de los recursos disponibles. El Plan consolidado cubre el período desde el 1^{ro} de julio de 2020 hasta el 30 de junio de 2025. Este documento sirve también como el Plan de acción del primer año, enumerando las metas para ese año y las estrategias para proyectos que van a recibir fondos en 2020.

Los recursos ofrecidos por HUD que se estudian en el Plan incluyen:

- Subvenciones en Bloque para Desarrollo Comunitario (CDBG - *Community Development Block Grant*): para promover el desarrollo económico y comunitario en ciudades pequeñas de todo el estado.
- Programa de Asociaciones para Inversión en Vivienda HOME (*HOME Investment Partnerships Program*): para promover la producción, preservación y rehabilitación de viviendas asequibles a familias de bajos ingresos, en alquiler o compra.
- Programa de Fondos Fiduciarios para la Vivienda (HTF - *Housing Trust Fund*): para promover la producción, preservación y rehabilitación de viviendas asequibles en alquiler a familias de muy bajos ingresos (ELI – *Extremely Low Income*).
- Programa de Subsidios para Refugios de Emergencia (ESG - *Emergency Solutions Grant Program*): para ofrecer los servicios necesarios para ayudar a personas sin hogar o en riesgo de estarlo a recuperar su estabilidad en una vivienda permanente.
- Programa de Oportunidades de Vivienda para Personas con SIDA (HOPWA - *Housing Opportunities for Persons with AIDS Program*): para afrontar las necesidades de vivienda de personas de bajos ingresos que tienen SIDA y sus familias.

Los programas HOME, HTF y ESG se administran por medio de la Agencia de desarrollo de viviendas de Tennessee (THDA - *Tennessee Housing Development Agency*), el programa CDBG lo administra el Departamento de desarrollo económico y comunitario de Tennessee (TNECD - *Tennessee Department of Economic and Community Development*), y el HOPWA lo administra el Departamento de salud de Tennessee. Aunque THDA es la agencia principal, responsable por coordinar el desarrollo del Plan consolidado, todas las agencias que administran los cinco programas de subsidios participaron en la creación del Plan consolidado.

El Plan de Acción Anual contenido en el Plan consolidado describe los montos de los cinco subsidios que se espera estarán disponibles durante el año programático 2020-21 y considera los métodos que se usarán para distribuir los fondos entre los solicitantes elegibles por las agencias administrativas. Los fondos se ofrecerán por medio de un proceso competitivo, o mediante el uso de una fórmula, o ambos.

Otros recursos de vivienda asequible disponibles al estado o que tienen un impacto sobre su desempeño también se examinan en el Plan consolidado e incluyen el programa de vales de elección de vivienda (sección 8) de HUD (HCV - *Housing Choice Voucher*), los Programas de administración de contratos

Sección 8 basados en proyectos, los Programas de educación para comprar viviendas de THDA, el Programa de crédito contributivo por inversión en la comunidad de Tennessee (CITC - *Community Investment Tax Credit Program*), el Programa de crédito para viviendas de bajos ingresos (LIHC - *Low-Income Housing Credit*) y el Programa de subsidios por concurso del HTF de Tennessee.

El proceso de consolidación del plan es una oportunidad para que la planificación estratégica y la participación ciudadana ocurran exhaustivamente. El Plan consolidado sirve como guía para tomar decisiones en cuanto al uso de estos recursos federales y establece metas programáticas, objetivos específicos e hitos para medir su progreso.

Resumen de los objetivos y resultados identificados en la evaluación general de necesidades

El Estado de Tennessee ha identificado cuatro necesidades prioritarias para el quinquenio cubierto por el Plan consolidado de 2020-2024. Estas incluyen:

- Oportunidades de vivienda limitadas: Preservar el inventario de viviendas asequibles; aumentar la cantidad de viviendas asequibles; y aumentar las oportunidades de comprar viviendas para las familias con ingresos bajos y moderados.
- Infraestructura anticuada, poca inversión en las comunidades, y recuperación después de desastres: Apoyar la viabilidad de comunidades al crear y mantener infraestructura de calidad, y mejorar la habitabilidad, salud y seguridad de las comunidades y su desarrollo económico.
- Servicios de apoyo limitados: Ofrecer servicios de apoyo para personas con VIH/SIDA y para personas sin hogar, así como servicios de apoyo no relacionados con la vivienda para el desarrollo comunitario.
- Expansión consciente de acceso equitativo a viviendas: garantizar el acceso a viviendas de calidad para miembros de clases protegidas y ofrecer difusión, educación y asesoramiento sobre equidad en la vivienda.

Además de estas necesidades prioritarias, HUD estableció tres metas y objetivos básicos para evaluar el desempeño del plan y el uso del mismo por el estado. Estas metas incluyen ofrecer viviendas dignas, proveer un entorno de vida adecuado, y expandir las oportunidades económicas para personas de ingresos bajos y moderados.

Los planes de cada estado deben indicar cómo alcanzarán estas metas para todos sus programas de desarrollo comunitario, así como para todos sus programas de vivienda.

Evaluación del desempeño anterior

El Estado de Tennessee continuará mejorando el progreso logrado los últimos cinco años para aumentar el número de unidades de vivienda asequibles y accesibles, contribuir a la sustentabilidad económica y estimular la vitalidad de las comunidades en todas las regiones del estado. Tennessee seguirá apoyando las actividades de los programas cuya efectividad se ha demostrado, a la vez que busca áreas donde esa efectividad o el impacto de los programas pueda mejorarse. Se puede obtener información específica sobre el desempeño de Tennessee en el Reporte de desempeño y evaluación del plan consolidado (CAPEER - *Consolidated Annual Performance and Evaluation Report*), disponible en el sitio web de THDA: <https://thda.org/research-planning/consolidated-planning>

Estado de Tennessee Plan Consolidado del 2020-2024 Y el Plan de Acción Anual 2020-2021

Appendix I-10

Para Viviendas Y Programas De Desarrollo Comunitario 4 de marzo - 20 de abril de 2020

La Agencia de Desarrollo de Vivienda de Tennessee (THDA) ha completado un borrador del Plan Consolidado del Estado de Tennessee 2020-2024 y el Plan de Acción Anual 2020-2021 para viviendas y desarrollo comunitario en Tennessee. El Plan Consolidado 2020-2024 y el Plan de Acción Anual 2020-2021 incluyen la planificación, aplicación, y notificación para cinco programas de subvenciones del Departamento de Viviendas y Desarrollo Urbano de los EE. UU. (HUD):

- o Bloque de Subvenciones para Desarrollo Comunitario (CDBG)
- o Programa de Asociaciones de Inversión (HOME)
- o Fondo de Subvenciones para Vivienda (HTF)
- o Subvención de Soluciones de Emergencia (ESG)
- o Programa de Oportunidades de Vivienda para Personas con SIDA (HOPWA)

Estos programas apoyan una variedad de esfuerzos de viviendas y desarrollo comunitario a lo largo de Tennessee para beneficiar a unidades familiares de bajo a moderado ingreso.

Se anima a que los ciudadanos revisen y hagan comentarios sobre la información contenida en el informe, disponible en <https://thda.org/about-thda/public-notice-and-comment> a partir del 4 de marzo de 2020. Un borrador del resumen estará disponible en inglés y español. Comentarios escritos vía presentación electrónica en el sitio web THDA serán aceptadas del 4 de marzo al 20 de abril de 2020.

La Agencia de Desarrollo de Viviendas de Tennessee (THDA) y sus socios alojan reuniones públicas a lo largo del estado para informar sobre el contenido del plan y escuchar los comentarios públicos. El informe y materias previas del Plan Consolidado serán publicados en <https://thda.org/research-planning/consolidated-planning>.

Para ver una lista de las audiencias públicas, revise el resumen ejecutivo y borrador, o deje un comentario hasta el 20 de abril :

<https://thda.org/about-thda/public-notice-and-comment>



Por favor envíe sus preguntas a Research@thda.org.

AUDIENCIAS PÚBLICAS DE 2020

Fecha y Hora*	Ciudad	Lugar
26 de marzo 4 a 6pm	Chattanooga	Southeast TN Development District 1000 Riverfront Parkway Chattanooga, TN 37402
30 de marzo 3:30 a 5:30pm	Cookeville	Upper Cumberland Development District 1104 England Drive Cookeville, TN 38501
31 de marzo 3:30 a 5:30pm	Jackson	Southwest TN Development District 102 E. College St. Jackson, TN 38301
1 de abril 9 a 11am	Martin	Northwest TN Development District 124 Weldon Drive Martin, TN 38237
1 de abril 3 a 5pm	Memphis	Memphis Area Association of Realtors Education Center 6393 Poplar Ave Memphis, TN 38119
7 de abril 11am a 1pm	Nashville	Greater Nashville Regional Council 220 Athens Way, Suite 200 Nashville, TN 37228
8 de abril 9 a 11am	Mt. Pleasant	South Central TN Development District 101 Sam Watkins Boulevard Mt. Pleasant, TN 38474
9 de abril 10am a mediodía	Knoxville	Farragut Town Hall Community Room 11408 Municipal Center Drive Knoxville, TN 37934
9 de abril 3 a 5pm	Johnson City	First Tennessee Development District 3211 N. Roan Street Johnson City, TN 37601

*Todas las horas son de hora local.

Acomodaciones especiales (e.g. personas que necesitan asistencia debido a discapacidades de audición o visión, o competencia limitada del inglés) tienen que pedirse con 15 días de anticipación antes de una audiencia pública, de manera escrita a Megan Webb, al Research@THDA.org.

إخطار بعقد جلسات علنية وإصدار الخطة الموحدة 2024-2020 وخطة العمل السنوية 2021-2020 لبرامج الإسكان والتنمية المجتمعية في ولاية تينيسي

لقد إنتهت "وكالة تينيسي للتنمية الإسكان" (THDA, Tennessee Housing Development Agency) من العمل على مسودة "الخطة الموحدة 2024-2020" (2020-2024 Consolidated Plan) و"خطة العمل السنوية 2021-2020" (2020-2021 Annual Action Plan) لولاية تينيسي من أجل الإسكان والتنمية في تينيسي. وتشمل الخطة الموحدة 2024-2020 وخطة العمل السنوية 2021-2020 إجراءات التخطيط وتقييم الطلبات والإبلاغ لخمس برامج هيئات لـ"الوزارة الأمريكية للإسكان والتنمية الحضرية" (HUD, U.S. Department of Housing and Urban Development):

- "المنحة الشاملة للتنمية المجتمعية" (CDBG, Community Development Block Grant)، بإدارة "دائرة تينيسي للتنمية الاقتصادية والمجتمعية" (TN Department of Economic and Community Development)
 - "برنامج شراكة الاستثمار" الإسكاني (HOME, HOME Investment Partnership Program)، بإدارة وكالة THDA
 - "صندوق إئتمان الإسكان" (HTF, Housing Trust Fund)، بإدارة وكالة THDA
 - "منحة الحلول الطارئة" (ESG, Emergency Solutions Grant)، بإدارة وكالة THDA
 - "برنامج فرص الإسكان للمصابين بمرض الإيدز" (HOPWA, Housing Opportunities for Persons with AIDS Program)، بإدارة "دائرة صحة تينيسي" (TN Department of Health)
- وتدعم هذه البرامج مجموعة متنوعة من الجهود المبذولة للإسكان والتنمية المجتمعية في كافة أنحاء تينيسي لمصلحة الأسر المعيشية ذات الدخل المتوسط والدخل المعتدل. والولاية ملزمة بإعداد وتقديم خطة موحدة لوزارة HUD كل خمس سنوات. وسيتم تقديم هذه الخطة الجديدة لوزارة HUD في مايو/أيار 2020.

إننا نحث المواطنين على الإطلاع على المعلومات المتضمنة في التقرير المتوفر على <https://thda.org/about-thda/public-notice-and-comment> ابتداءً من 4 مارس/آذار 2020، وعلى تقديم التعليقات عليها. كما ستكون مسودة خلاصة باللغتين الإنجليزية والإسبانية متوفرة. وسيتم القبول بالتعليقات الخطية عبر تقديمها إلكترونياً على موقع إنترنت وكالة THDA ابتداءً من 4 مارس/آذار – 20 أبريل/نيسان 2020.

公众听证会通知以及针对住房和社区发展计划的 2020-2024 年田纳西州综合计划以及 2020-2021 年年度行动计划发布

田纳西州住房发展署 (THDA) 已完成了针对田纳西州住房和社区发展的田纳西州 2020-2024 年综合计划和 2020-2021 年年度行动计划。2020-2024 年综合计划和 2020-2021 年年度行动计划包括以下五个美国住房和城市发展部 (HUD) 拨款计划的规划、申请和报告：

- 社区发展基金 (CDBG, 由田纳西州经济和社区发展部经管)
- HOME 投资合作计划 (HOME, 由 THDA 经管)
- 住房信托基金 (HTF, 由 THDA 经管)
- 应急方案拨款 (ESG, 由 THDA 经管)
- 艾滋病人士住房机会计划 (HOPWA, 由田纳西州卫生部经管)

这些计划支持田纳西州各地的各种住房和社区发展工作，以造福中低收入家庭。该州需每五年向 HUD 起草和提交一份综合计划。这一新的计划将于 2020 年 5 月递交至 HUD。

鼓励公民从 2020 年 3 月 4 日起，查阅 <https://thda.org/about-thda/public-notice-and-comment> 上报告中所提供的信息并提供相关意见。还将提供英语和西班牙语的草稿概要。我们将于 2020 年 3 月 4 日至 4 月 20 日接受在 THDA 网站上以电子方式递交的书面意见。

OGEYSIIS KU AADDAN DHIGEYSI DADWEYNE IYO BIXINTA ISUGEYNTA QORSHAHA GOBOLKA TENNESSEE
EE 2020-2024 IYO QORSHAHA TALLAABADA SANADLAHA AH EE LOOGU TALAGALAY BARNAAMIYADA
GURYAYNTA IYO HORRUMARINTA JAALIYADDA

Waaxda Horrumarinta Guryaynta ee Tennessee (Tennessee Housing Development Agency) (THDA) waxay dhammaystirtay oo ay diyaarisay nuqul qoraal oo ah Qorshaha Iskujirka ee 2020-2024 ee Gobolka Tennessee iyo Qorshaha Tallaabada Sanadlaha ah ee 2020-2021 ee loogu talagalay guryaynta iyo horrumarinta jaaliyadda ee Tennessee. Qorsha Iskujirka ee 2020-2024 iyo Qorshaha Tallaabada Sanadlaha ee 2020-2021 waxaa la socoda oo weheliya qorshayn, codsi, iyo warbixin loo gudbinayo barnaamijyada deeqda ee shanta barnaamijyo ee deeqda ee Waaxda Guryaha iyo Horrumarinta Magaalooyinka Mareykanka [U.S. Department of housing and Urban Development] (HUD):

- Deeqda Dowladda ku Bixiso Horrumarinta Jaaliyadda (CDBG, oo ay maarayso Waaxda Dhaqaalaha iyo Horrumarinta Jaaliyadda ee TN (TN Department of Economic and Community Development)
- Barnaajka Iskaashiga Maalgelinta GURYAHA (HOME) (HOME, oo ay maarayso THDA)
- Sanduuqa Aamminaada Guryaynta (Housing Trust Fund) (HTF, oo ay maarayso THDA)
- Deeqda Xalinta Degdegga (Emergency Solutions Grant) (ESG, oo ay maarayso THDA)
- Fursaddaha Guryaynta ee loogu talagalay Shaqsiyaadka qaba Barnaamijka AIDS (HOPWA, oo ay maarayso Waaxda Caafimaadka ee TN)

Barnaamijyadan waxaa loogu talagalay in lagu taageero dhowr barnaamijyo ee dhanka guryaynta iyo dadaallada horrumarinta jaaliyadda ee ka jira gebbi ahaan gobolka Tennessee, gaar ahaanna loogu talagalay in ay ka faa'idaystaan qoysaska daqligooda dhexdhexaadka ah - iyo kuwa daqligoodu uu hooseeyo. Dowladda Gobolka waxaa looga baahan yahay in ay diyaariso oo ay waaxda HUD u gudbiso Qorshaha Iskujirka ah ee ay gudbiso shantii sannadba hal mar. Qorshahan cusub ayaa waaxda HUD loo soo gudbin doonaa kama dambays bisha Maajo 2020.

Muwaadiniinta ayaa waxaa lagu dhiirigelinayaa inay dib u eegid ku sameeyaan oo ay ra'yi ka bixiyaan macluumaadka kujira warbixinta oo laga arki karo <https://thda.org/about-thda/public-notice-and-comment> laga bilaabo 4ta bisha Maarso, 2020. Qabyo qoraalkan oo kooban oo ku qoran af Ingiriisi iyo af Isbanish ayaa sidoo kale la heli doonaa. Faallooyinka oo qoraalka ah oo dhanka elegtaroonigga ah lagu soo gudbiyo bogga internetka THDA waxaan ogolaan doonaa laga bilaabo 4ta Maarso ilaa iyo 20ka Abriil, 2020.

AVISO DE AUDIENCIAS PUBLICAS Y DIVULGACIÓN DEL PLAN CONSOLIDADO DEL ESTADO DE TENNESSEE 2020-2024 Y EL PLAN DE ACCIÓN ANUAL 2020-2021 PARA VIVIENDAS Y PROGRAMAS DE DESARROLLO COMUNITARIO

La Agencia de Desarrollo de Vivienda de Tennessee (THDA) ha completado un borrador del Plan Consolidado del Estado de Tennessee 2020-2024 y el Plan de Acción Anual 2020-2021 para viviendas y desarrollo comunitario en Tennessee. El Plan Consolidado 2020-2024 y el Plan de Acción Anual 2020-2021 incluyen la planificación, aplicación, y notificación para cinco programas de subvenciones del Departamento de Viviendas y Desarrollo Urbano de los EE. UU. (HUD):

- Bloque de Subvenciones para Desarrollo Comunitario (CDBG), suministrado por el Departamento del Desarrollo Económico y Comunitario de Tennessee)
- Programa de Asociaciones de Inversión (HOME, suministrado por la THDA)
- Fondo de Subvenciones para Vivienda (HTF, suministrado por la THDA)
- Subvención de Soluciones de Emergencia (ESG, suministrada por la THDA)
- Programa de Oportunidades de Vivienda para Personas con SIDA (HOPWA), suministrado por el Departamento de Salud de Tennessee)

Estos programas apoyan una variedad de esfuerzos de viviendas y desarrollo comunitario a lo largo de Tennessee para beneficiar a unidades familiares de bajo a moderado ingreso. Se requiere que el Estado prepare y presente un Plan Consolidado al HUD cada cinco años. Este nuevo Plan será presentado al HUD en mayo de 2020.

Se anima a que los ciudadanos revisen y hagan comentarios sobre la información contenida en el informe, disponible en <https://thda.org/about-thda/public-notice-and-comment> a partir del 4 de marzo de 2020. Un borrador del resumen estará disponible en inglés y español. Comentarios escritos vía presentación electrónica en el sitio web THDA serán aceptadas del 4 de marzo al 20 de abril de 2020.

La Agencia de Desarrollo de Viviendas de Tennessee (THDA) y sus socios alojan reuniones públicas a lo largo del estado para informar sobre el contenido del plan y escuchar los comentarios públicos. El informe y materias previas del Plan Consolidado serán publicados en <https://thda.org/research-planning/consolidated-planning>. Las reuniones están programadas de la siguiente manera:

Fecha y Hora*	Ciudad	Lugar	Contacto
26 de marzo de 2020 4 a 6pm	Chattanooga	Southeast TN Development District 1000 Riverfront Parkway Chattanooga, TN 37402	Chuck Hammonds 423-266-5781
30 de marzo de 2020 3:30 a 5:30pm	Cookeville	Upper Cumberland Development District 1104 England Drive Cookeville, TN 38501	Tommy Lee 931-432-4111
31 de marzo de 2020 3:30 a 5:30pm	Jackson	Southwest TN Development District 102 E. College St. Jackson, TN 38301	Thomas Skehan 731-668-6429
1 de abril de 2020 9 a 11am	Martin	Northwest TN Development District 124 Weldon Drive Martin, TN 38237	Jessica Baker 731-587-4213
1 de abril de 2020 3 a 5pm	Memphis	Memphis Area Association of Realtors Education Center	Paul Morris 901-729-2871

		6393 Poplar Ave Memphis, TN 38119	(alojado por el MAAG)
7 de abril de 2020 11am a 1pm	Nashville	Greater Nashville Regional Council 220 Athens Way, Suite 200 Nashville, TN 37228	Angela Hubbard 615-880-3746
8 de abril de 2020 9 a 11am	Mt. Pleasant	South Central TN Development District 101 Sam Watkins Boulevard Mt. Pleasant, TN 38474	Tia Lockridge 931-379-2929
9 de abril de 2020 10am a mediodía	Knoxville	Farragut Town Hall Community Room 11408 Municipal Center Drive Knoxville, TN 37934	Terry Bobrowski 865-273-6003 (alojado por el ETDD)
9 de abril de 2020 3 a 5pm	Johnson City	First Tennessee Development District 3211 N. Roan Street Johnson City, TN 37601	Bill Forrester 423-928-0224

*Todas las horas son de hora local.

Acomodaciones especiales (e.g. personas que necesitan asistencia debido a discapacidades de audición o visión, o competencia limitada del inglés) tienen que pedirse con 15 días de anticipación antes de una audiencia pública, de manera escrita a Megan Webb, al research@thda.org.

Other Text to Translate:

Haga clic aquí para (español)

Por favor, presente su comentario abajo sobre el Plan Consolidado.

Introduzca su nombre y dirección de correo electrónico si desea que un miembro del personal le contacte en cuanto a su respuesta. Su información de contacto permanecerá en privado.

¡Gracias por participar!

إخاطر عقد جلسات غيبية وإصدار الخطة الموحدة 2024-2020 وخطة العمل السنوية 2021-2020 لبرامج ان والتني في تم عي في و ي قتييس

لقد تمت "ولكل قتييس ي لتني في ا كان" (Tennessee Housing Development Agency، THDA) من العمل غي مسودة الخطة الموحدة 2024-2020 Consolidated Plan (و "خطة العمل السنوية 2021-2020" 2020-2021 Annual Action Plan) (لوي قتييس من أجل ا سكان والتني في قتييس ي. وتشمل الخطة الموحدة 2024-2020 وخطة العمل السنوية 2021-2020 إجراءات التخطيط وتقييم اللطبات واب غل خص ق برامج بباتل ل وزارة ا مولي كل سكان والتني في ل حضري) (U.S. Department of Housing and Urban Development، HUD):

- "المنح لشل ل قتييس في ا لم عي" (CDBG، Community Development Block Grant) (بإدارة "نظر قتييس ي لتني في بقص اي قوال م عي" (TN Department of Economic and Community Development)
 - "برنامج شراكة نتمار" (كلي (HOME Investment Partnership Program، HOME) (بإدارة وكلاء THDA
 - "صندوق طمان كان" (HTF، Housing Trust Fund) (بإدارة لخال THDA
 - "منح ل حل ل الطاية" (ESG، Emergency Solutions Grant) (بإدارة لخال THDA
 - "برنامج فرص كان للمصريين بمرض يذ" (Housing Opportunities for Persons with AIDS Program، HOPWA) (بإدارة "نظر صرح قتييس ي" (TN Department of Health)
- وتدعم هذه البرامج م مجموع قنوعة من ال ج مودل ليدول كل كان والتني في ا لم عي عي قتي ل لخال أن ا عي قتي ل لصل حة رال ج عي ذات الدخل الغني يوال الدخل الم عدل. و ا ي مل زم قبا ع دان قتي قيم خطة موحدة ل وزارة HUD كل خ م س س ن و ات. و س ي قتي قيم هذه الخطة ا ل ج ي د ل وزارة HUD ي م ا ي و ل ي ا ر 2020.

لأننا نحث المواطنين غي ا ط ع غي ل م قوامات ل لخص في قتي ل ل قير ل لغير غي <https://thda.org/about-thda/public-notice-and-comment> ب ل ت داء من 4 مارس/ آذار 2020، و غي قتي قيم ل ل قتي ا ت غي ه ا ل م استكون م سودة خ ص ق ل ل غي ن ا ن ل ي ن ية و ا س ل ية ل ل قير. و س ي قتم القبول ل ل قتي ا ت ل ل خ ط ية ع ي ر ق ي م ه ا ل ل ل ق ر و ي ا غي م ق ع ل ل ن ت و ل ل لة THDA ب ل ت داء من 4 مارس/ آذار - 20 أبريل/ نيسان 2020.

يتمولى "ولكل قتييس ي لتني في ا سكان" (Tennessee Housing Development Agency، THDA) (و شركاءه الصوافة ا ج م ا ع ا ت ع ل ية ع ر ل و ي قتي قيم ع ل و م ا ت ع ن م ص ي ا ت ل ل خ ط ق و س م ا ع ت ق ي ق ا ت ل ج م و ر ل ا م. و س ي قتم ع ر ض ال ع ل و م ا ت الم مقدمة و ل م و ا ل س ل ي ق ل ل خ طة ل موحدة ع ل <https://thda.org/research-planning/consolidated-planning> و ت و ا ي خ ت م ا ع ا ت ه ي ك ل ي:

التي ا ي خ ل ل س ا ع *	ل م ع ية	ال م ق ع	ج هة ت ص ل
26 مارس/ آذار 2020 4-6 ع ل ظ م	ق ت ا ن و غ ا	Southeast TN Development District 1000 Riverfront Parkway Chattanooga, TN 37402	تش ا ك ه ا م ن د ز 423-266-5781
30 مارس/ آذار 2020 3:30-5:30 ع ل ظ م	ل ط ف ي ل	Upper Cumberland Development District 1104 England Drive Cookeville, TN 38501	ت و م ي ل ي 931-432-4111
31 مارس/ آذار 2020 3:30-5:30 ع ل ظ م	ج ا ل ف س و ن	Southwest TN Development District 102 E. College St. Jackson, TN 38301	ت و م ا س ر ل ي ه ا ن 731-668-6429
1 أبريل/ نيسان 2020 9-11 ص ب ا ح	م ا ر ت ن	Northwest TN Development District 124 Weldon Drive Martin, TN 38237	ج س ر ي ك ل ي ك ر 731-587-4213
1 أبريل/ نيسان 2020 3-5 ع ل ظ م	م ه ن س	Memphis Area Association of Realtors Education Center	ب و ل م و ر ي س

901-729-2871 (استضافة MAAG)	6393 Poplar Ave Memphis, TN 38119		
أنجي بلرد 615-880-3746	Greater Nashville Regional Council 220 Athens Way, Suite 200 Nashville, TN 37228	شفييل	7 بليل نيسان 2020 11am-1pm
بيالوري دج 931-379-2929	South Central TN Development District 101 Sam Watkins Boulevard Mt. Pleasant, TN 38474	ماونتبيلزنت	8 بليل نيسان 2020 11-9 صباحا
بيبي بيرواوسكي 865-273-6003 (استضافة ETDD)	Farragut Town Hall Community Room 11408 Municipal Center Drive Knoxville, TN 37934	لغوفيل	9 بليل نيسان 2020 10 صباحا-مخصص لظمر
بيالفرستر 423-928-0224	First Tennessee Development District 3211 N. Roan Street Johnson City, TN 37601	جونسون سيتي	9 بليل نيسان 2020 3-5 عد لظمر

*تفكلساعات واردت في تالجل.

في جيفتي م طبات لتسي تالخصة (م ش ل ش خاص الامضاجين الى من اعدت بسبب إغوثك مجلس مدية أوالهصري، أوسبب
نقول هم الام حدود للغة ان لحيوية (خطيا قبل 15 يوم من تايخ اللمسة اللمية قلي غن ويب) Megan Webb (على
research@thda.org.

公众听证会通知以及针对住房和社区发展计划的 2020-2024 年田纳西州综合计划以及 2020-2021 年年度行动计划发布

田纳西州住房发展署 (THDA) 已完成了针对田纳西州住房和社区发展的田纳西州 2020-2024 年综合计划和 2020-2021 年年度行动计划。2020-2024 年综合计划和 2020-2021 年年度行动计划包括以下五个美国住房和城市发展部 (HUD) 拨款计划的规划、申请和报告：

- 社区发展基金 (CDBG, 由田纳西州经济和社区发展部经管)
- HOME 投资合作计划 (HOME, 由 THDA 经管)
- 住房信托基金 (HTF, 由 THDA 经管)
- 应急方案拨款 (ESG, 由 THDA 经管)
- 艾滋病人士住房机会计划 (HOPWA, 由田纳西州卫生部经管)

这些计划支持田纳西州各地的各种住房和社区发展工作，以造福中低收入家庭。该州需每五年向 HUD 起草和提交一份综合计划。这一新的计划将于 2020 年 5 月递交至 HUD。

鼓励公民从 2020 年 3 月 4 日起，查阅 <https://thda.org/about-thda/public-notice-and-comment> 上报告中所提供的信息并提供相关意见。还将提供英语和西班牙语的草稿概要。我们于 2020 年 3 月 4 日至 4 月 20 日接受在 THDA 网站上以电子方式递交的书面意见。

田纳西州住房发展署 (THDA) 及其合作伙伴正在全州范围内举行公开会议，以介绍该计划的内容，并听取公众的意见。这一介绍演示和之前的综合计划材料将发布在 <https://thda.org/research-planning/consolidated-planning>。会议安排如下：

日期和时间*	城市	地点	联系信息
2020 年 3 月 26 日 下午 4:00 - 6:00	查特努加市	Southeast TN Development District 1000 Riverfront Parkway Chattanooga, TN 37402	Chuck Hammonds 423-266-5781
2020 年 3 月 30 日 下午 3:30-5:30	库克维尔	Upper Cumberland Development District 1104 England Drive Cookeville, TN 38501	Tommy Lee 931-432-4111
2020 年 3 月 31 日 下午 3:30-5:30	杰克逊	Southwest TN Development District 102 E. College St. Jackson, TN 38301	Thomas Skehan 731-668-6429
2020 年 4 月 1 日 上午 9:00 - 6:00	马丁	Northwest TN Development District 124 Weldon Drive Martin, TN 38237	Jessica Baker 731-587-4213
2020 年 4 月 1 日 下午 3:00 - 5:00	孟菲斯	Memphis Area Association of Realtors Education Center 6393 Poplar Ave Memphis, TN 38119	Paul Morris 901-729-2871

			(由 MAAG 主办)
2020 年 4 月 7 日 上午 11:00 至下午 1:00	那什维尔	Greater Nashville Regional Council 220 Athens Way, Suite 200 Nashville, TN 37228	Angela Hubbard 615-880-3746
2020 年 4 月 8 日 上午 9:00 - 6:00	芒特普莱森特	South Central TN Development District 101 Sam Watkins Boulevard Mt. Pleasant, TN 38474	Tia Lockridge 931-379-2929
2020 年 4 月 9 日 上午 10:00 至中午	诺克斯维尔	Farragut Town Hall Community Room 11408 Municipal Center Drive Knoxville, TN 37934	Terry Bobrowski 865-273-6003 (由 ETDD 主办)
2020 年 4 月 9 日 下午 3:00 - 5:00	约翰逊城	First Tennessee Development District 3211 N. Roan Street Johnson City, TN 37601	Bill Forrester 423-928-0224

*所有时间为当地时间。

特殊调整（如因听力或视力障碍或英语能力有限而需要帮助的人）必须在公众听证会前 15 天以书面形式通知 Megan Webb，地址：research@thda.org。

2020-2024 테네시주 통합 계획 발표 및 공청회, 2020-2024 주택 및 지역 사회 개발 프로그램에 대한 연례 실행 계획 공지

테네시 주택 개발 기관(The Tennessee Housing Development Agency, THDA)은 테네시주 통합 계획과 2020-2021 테네시 내 주택 및 지역 사회 개발에 대한 연례 실행 계획 초안을 완료하였습니다. 2020-2024 통합 계획 및 2020-2021 연례 실행 계획에는 다음과 같은 미국 주택 및 도시 개발부(Housing and Urban Development, HUD) 보조금 프로그램 5 개에 대한 계획, 적용 및 보고가 포함됩니다.

- 지역 사회 개발 정책 교부금(Community Development Block Grant, CDBG, TN 경제 및 지역 사회 개발부에서 관리)
- 주택 투자 파트너십 프로그램(HOME Investment Partnership Program, HOME, THDA 에서 관리)
- 주택 신탁 기금(Housing Trust Fund, HTF, THDA 에서 관리)
- 비상 해결책 보조금(Emergency Solutions Grant, ESG, THDA 에서 관리)
- 에이즈 환자를 위한 주택 기회 프로그램(Housing Opportunities for Persons with AIDS, HOPWA, TN 보건부에서 관리)

이러한 프로그램은 테네시주 전역에서 저소득 및 중간 소득 가구가 혜택을 볼 수 있도록 하는 다양한 주택 및 지역 사회 개발 노력을 지원하고 있습니다. 주정부는 5 년마다 통합 계획을 마련하여 HUD 에 제출해야 합니다. 이 새로운 계획은 2020 년 5 월 HUD 로 제출될 것입니다.

시민 여러분께서는 2020 년 3 월 4 일부터 <https://thda.org/about-thda/public-notice-and-comment> 에서 인할 수 있는 해당 보고서의 내용을 검토하시고 의견을 남겨주시길 바랍니다. 영어와 스페인어로 된 초안 요약 또한 제공됩니다. 2020 년 3 월 4 일부터 4 월 20 일까지 THDA 웹 사이트에서 전자 방식을 통해 서면으로 의견을 남길 수 있습니다.

테네시 주택 개발 기관(THDA)과 파트너들은 이번 계획의 내용을 발표하고 대중의 의견을 듣기 위해 테네시 주 곳곳에서 공개 회의를 주최할 예정입니다. 이번 발표 및 사전 통합 계획 자료는 <https://thda.org/research-planning/consolidated-planning> 에 게시됩니다. 공개 회의 일정은 다음과 같습니다.

일시*	도시	장소	문의
2020 년 3 월 26 일 오후 4 시~오후 6 시	채터누가	Southeast TN Development District 1000 Riverfront Parkway Chattanooga, TN 37402	Chuck Hammonds 423-266-5781
2020 년 3 월 30 일 오후 3 시 30 분~오후 5 시 30 분	쿡빌	Upper Cumberland Development District 1104 England Drive Cookeville, TN 38501	Tommy Lee 931-432-4111
2020 년 3 월 31 일 오후 3 시 30 분~오후 5 시 30 분	잭슨	Southwest TN Development District 102 E. College St. Jackson, TN 38301	Thomas Skehan 731-668-6429

2020 년 4 월 1 일 오전 9 시~오전 11 시	마틴	Northwest TN Development District 124 Weldon Drive Martin, TN 38237	Jessica Baker 731-587-4213
2020 년 4 월 1 일 오후 3 시~오후 5 시	멤피스	Memphis Area Association of Realtors Education Center 6393 Poplar Ave Memphis, TN 38119	Paul Morris 901-729-2871 (MAAG 주최)
2020 년 4 월 7 일 오전 11 시~ 오후 1 시	내슈빌	Greater Nashville Regional Council 220 Athens Way, Suite 200 Nashville, TN 37228	Angela Hubbard 615-880-3746
2020 년 4 월 8 일 오전 9 시~오전 11 시	마운틴 플레전트	South Central TN Development District 101 Sam Watkins Boulevard Mt. Pleasant, TN 38474	Tia Lockridge 931-379-2929
2020 년 4 월 9 일 오전 10 시~ 낮 12 시	녹스빌	Farragut Town Hall Community Room 11408 Municipal Center Drive Knoxville, TN 37934	Terry Bobrowski 865-273-6003 (ETDD 주최)
2020 년 4 월 9 일 오후 3 시~오후 5 시	존슨 시티	First Tennessee Development District 3211 N. Roan Street Johnson City, TN 37601	Bill Forrester 423-928-0224

*모두 현지 시각입니다.

특수 편의 시설(예 : 청각이나 시각 장애 또는 제한된 영어 능력으로 인해 도움이 필요하신 분)은
공청회 15 일 전 Megan Webb(research@thda.org)에게 서면 요청해야 합니다.

ແຈ້ງການເລື່ອງການຮັບຟັງຄໍາຄິດເຫັນຂອງສັງຄົມ ແລະ ການເປີດເຜີຍແຜນການສັງລວມຂອງລັດເທັນເນັສຊີປະຈຳປີ 2020-2024 ແລະ ແຜນດໍາເນີນງານປະຈຳປີ 2020-2021 ສໍາລັບໂຄງການພັດທະນາທີ່ຢູ່ອາໄສ ແລະ ຊຸມຊົນ

ໜ່ວຍງານພັດທະນາທີ່ຢູ່ອາໄສລັດເທັນເນັສຊີ (THDA) ໄດ້ສໍາເລັດຮ່າງແຜນການສັງລວມຂອງລັດເທັນເນັສຊີປະຈຳປີ 2020-2024 ແລະ ແຜນດໍາເນີນງານປະຈຳປີ 2020-2021 ສໍາລັບໂຄງການພັດທະນາທີ່ຢູ່ອາໄສ ແລະ ຊຸມຊົນຢູ່ໃນລັດເທັນເນັສຊີ. ແຜນການສັງລວມຂອງລັດເທັນເນັສຊີປະຈຳປີ 2020-2024 ແລະ ແຜນດໍາເນີນງານປະຈຳປີ 2020-2021 ລວມມີການວາງແຜນ, ການນໍາໃຊ້ ແລະ ການລາຍງານສໍາລັບໂຄງການຊ່ວຍເຫຼືອລ້າຂອງກະຊວງພັດທະນາທີ່ຢູ່ອາໄສ ແລະ ຕົວເມືອງ (HUD) ສະຫະລັດທ້າຍໂຄງການຄື:

- ໂຄງການທຶນຊ່ວຍເຫຼືອອາຄານພັດທະນາຊຸມຊົນ (CDBG, ບໍລິຫານງານໂດຍພະແນກພັດທະນາເສດຖະກິດ ແລະ ຊຸມຊົນລັດເທັນເນັສຊີ)
- ໂຄງການຮຸ້ນສ່ວນການລົງທຶນ HOME (HOME, ບໍລິຫານງານໂດຍ THDA)
- ກອງທຶນເຊື່ອໝັ້ນທີ່ຢູ່ອາໄສ (HTF, ບໍລິຫານງານໂດຍ THDA)
- ໂຄງການທຶນຊ່ວຍເຫຼືອການແກ້ໄຂບັນຫາສຸກເສີນ (ESG, ບໍລິຫານງານໂດຍ THDA)
- ໂຄງການເປີດໂອກາດໃຫ້ຄົນທີ່ເປັນເອດສ໌ (AIDS) ມີທີ່ຢູ່ອາໄສ (HOPWA, ບໍລິຫານງານໂດຍພະແນກສາທາລະນະສຸກຂອງລັດເທັນເນັສຊີ)

ໂຄງການເຫຼົ່ານີ້ສະໜັບສະໜູນຄວາມພະຍາຍາມຕ່າງໆຂອງການພັດທະນາທີ່ຢູ່ອາໄສ ແລະ ຊຸມຊົນທີ່ວັດເທັນເນັສຊີເພື່ອຜົນປະໂຫຍດຂອງຄອບຄົວທີ່ມີລາຍໄດ້ຕໍ່າ ແລະ ປານກາງ. ທາງລັດຖິກຮຽກຮ້ອງໃຫ້ກະກຽມ ແລະ ສົ່ງແຜນສັງລວມໃຫ້ແກ່ HUD ທຸກໆທ້າຍປີ. ແຜນການໃໝ່ນີ້ຈະສົ່ງໃຫ້ກັບທາງ HUD ໃນເດືອນພຶດສະພາ 2020.

ພົນລະເມືອງໄດ້ຮັບການສະໜັບສະໜູນໃຫ້ທົບທວນເບິ່ງ ແລະ ໃຫ້ຄໍາຄິດເຫັນຕໍ່ຂໍ້ມູນທີ່ມີຢູ່ໃນບົດລາຍງານທີ່ມີຢູ່ທີ່ <https://thda.org/about-thda/public-notice-and-comment> ເລີ່ມຕົ້ນວັນທີ 4 ມີນາ 2020. ນອກນັ້ນຈະມີຮ່າງບົດສັງລວມທີ່ເປັນພາສາອັງກິດ ແລະ ພາສາສະເປນໃຫ້ນຳ. ຄໍາຄິດເຫັນເປັນລາຍລັກອັກສອນຜ່ານການສົ່ງທາງອີເລັກໂທຣນິກໃນເວັບໄຊ THDA ຈະຮັບໄດ້ເລີ່ມຈາກວັນທີ 4 ມີນາ-20 ເມສາ 2020.

ໜ່ວຍງານພັດທະນາທີ່ຢູ່ອາໄສລັດເທັນເນັສຊີ (THDA) ແລະ ຄູ່ຮ່ວມງານກໍາລັງເປັນເຈົ້າພາບຈັດກອງປະຊຸມສາທາລະນະໃນທົ່ວລັດເພື່ອນຳສະເໜີເນື້ອຫາຂອງແຜນການ ແລະ ຟັງຄໍາຄິດເຫັນຂອງສັງຄົມ. ບົດນຳສະເໜີ ແລະ ເອກະສານແຜນສັງລວມກ່ອນຈະໂພສລົງໃນ <https://thda.org/research-planning/consolidated-planning>. ກອງປະຊຸມຕ່າງໆແມ່ນໄດ້ກຳນົດຕາຕະລາງເວລາດັ່ງລຸ່ມນີ້:

ວັນທີ ແລະ ເວລາ*	ເມືອງ	ສະຖານທີ່	ຕິດຕໍ່
26 ມີນາ 2020 4-6 ໂມງແລງ	ຊັດຕະນູກາ (Chattanooga)	ເຂດພັດທະນາລັດເທັນເນັສຊີທາງຕາເວັນອອກສຽງໃຕ້ (Southeast TN Development District) 1000 Riverfront Parkway Chattanooga, TN 37402	ຊັກ ຮາມ້ອນ (Chuck Hammonds) 423-266-5781

30 ມີນາ 2020 3:30-5:30 ໂມງແລງ	ຄູກເກວິວ (Cookeville)	ເຂດພັດທະນາຄຳເບີແລນຕອນເທິງ (Upper Cumberland Development District) 1104 England Drive Cookeville, TN 38501	ທອມມີ ລີ (Tommy Lee) 931-432-4111
31 ມີນາ 2020 3:30-5:30 ໂມງແລງ	ແຈັກສັນ (Jackson)	ເຂດພັດທະນາລັດເທິງເນັສຊີຕາເວັນຕົກສຽງໃຕ້ (Southwest TN Development District) 102 E. College St. Jackson, TN 38301	ໂທມັສ ສະເກຮານ (Thomas Skehan) 731-668-6429
1 ເມສາ 2020 9-11 ໂມງເຊົ້າ	ມາຕິນ (Martin)	ເຂດພັດທະນາລັດເທິງເນັສຊີຕາເວັນຕົກສຽງເໜືອ (Northwest TN Development District) 124 Weldon Drive Martin, TN 38237	ເຈັສຊິກາ ເບັກເກີ (Jessica Baker) 731-587-4213
1 ເມສາ 2020 3-5 ໂມງແລງ	ເມັມຟິສ (Memphis)	ສະມາຄົມນັກທຸລະກິດຫຼັກຊັບເຂດເມັມຟິສ (Memphis Area Association of Realtors) ສູນການສຶກສາ (Education Center) 6393 Poplar Ave Memphis, TN 38119	ໂພລ ມໍຣິສ (Paul Morris) 901-729-2871 (ເຈົ້າພາບໂດຍ MAAG)
7 ເມສາ 2020 11ໂມງເຊົ້າ - 1 ໂມງແລງ	ນາສວິລ (Nashville)	ສະພາເຂດນາສວິລໃຫຍ່ (Greater Nashville Regional Council) 220 Athens Way, Suite 200 Nashville, TN 37228	ແອງເຈລາ ຮັບບາດ (Angela Hubbard) 615-880-3746
8 ເມສາ 2020 9-11 ໂມງເຊົ້າ	ເມົ້າພລີແຊັນ (Mt. Pleasant)	ເຂດພັດທະນາລັດເທິງເນັສຊີພາກກາງຕອນໃຕ້ (South Central TN Development District) 101 Sam Watkins Boulevard Mt. Pleasant, TN 38474	ເຕຍ ລັອກຣິດຈ໌ (Tia Lockridge) 931-379-2929
9 ເມສາ 2020 10 ໂມງເຊົ້າ - ທຸ່ງ	ນັອກວິລ (Knoxville)	ຫ້ອງຊຸມຊົນສາລາກາງເມືອງຟາຣາກູດ (Farragut Town Hall Community Room) 11408 Municipal Center Drive Knoxville, TN 37934	ເທີຣີ ບັອບໂຣສະກີ (Terry Bobrowski) 865-273-6003 (ເປັນເຈົ້າພາບໂດຍ ETDD)
9 ເມສາ 2020 3-5 ໂມງແລງ	ເມືອງຈອນສັນ (Johnson City)	ເຂດພັດທະນາລັດເທິງເນັສຊີທິນຶງ (First Tennessee Development District) 3211 N. Roan Street Johnson City, TN 37601	ບິລ ຟໍເຣັສເຕີ (Bill Forrester) 423-928-0224

*ເວລາທັງໝົດເປັນເວລາທ້ອງຖິ່ນ.

ການຮອງຮັບພິເສດ (ຕົວຢ່າງ: ຄົນທີ່ຕ້ອງການຄວາມຊ່ວຍເຫຼືອເນື່ອງຈາກມີຄວາມພິການທາງດ້ານການຟັງ ຫຼື ສາຍຕາ ຫຼື ມີຄວາມຮູ້ພາສາອັງກິດຈຳກັດ) ຕ້ອງສະເໜີຂໍເປັນລາຍລັກອັກສອນກ່ອນການຮັບຟັງຄຳຄິດເຫັນສາທາລະນະ 15 ວັນດ້ວຍການສົ່ງເຖິງທ້າວ ມິການ ເວັບ (Megan Webb) ທີ່ research@thda.org.

**OGEYSIIS KU AADDAN DHIGEYSI DADWEYNE IYO BIXINTA ISUGEYNTA QORSHAHA GOBOLKA TENNESSEE
EE 2020-2024 IYO QORSHAHA TALLAABADA SANADLAHA AH EE LOOGU TALAGALAY BARNAMIYADA
GURYAYNTA IYO HORRUMARINTA JAALIYADDA**

Waaxda Horrumarinta Guryaynta ee Tennessee (Tennessee Housing Development Agency) (THDA) waxay dhammaystirtay oo ay diyaarisay nuqul qoraal oo ah Qorshaha Iskujirka ee 2020-2024 ee Gobolka Tennessee iyo Qorshaha Tallaabada Sanadlaha ah ee 2020-2021 ee loogu talagalay guryaynta iyo horrumarinta jaaliyadda ee Tennessee. Qorsha Iskujirka ee 2020-2024 iyo Qorshaha Tallaabada Sanadlaha ee 2020-2021 waxaa la socoda oo weheliya qorshayn, codsi, iyo warbixin loo gudbinnaayo barnaamijyada deeqda ee shanta barnaamijyo ee deeqda ee Waaxda Guryaha iyo Horrumarinta Magaalooyinka Mareykanka [U.S. Department of housing and Urban Development] (HUD):

- Deeqda Dowladda ku Bixiso Horrumarinta Jaaliyadda (CDBG, oo ay maarayso Waaxda Dhaqaalaha iyo Horrumarinta Jaaliyadda ee TN (TN Department of Economic and Community Development)
- Barnaajka Iskaashiga Maalgelinta GURYAHA (HOME) (HOME, oo ay maarayso THDA)
- Sanduuqa Aaminaada Guryaynta (Housing Trust Fund) (HTF, oo ay maarayso THDA)
- Deeqda Xalinta Degdegga (Emergency Solutions Grant) (ESG, oo ay maarayso THDA)
- Fursaddaha Guryaynta ee loogu talagalay Shaqsiyaadka qaba Barnaamijka AIDS (HOPWA, oo ay maarayso Waaxda Caafimaadka ee TN)

Barnaamijyadan waxaa loogu talagalay in lagu taageero dhowr barnaamijyo ee dhanka guryaynta iyo dadaallada horrumarinta jaaliyadda ee ka jira gebbi ahaan gobolka Tennessee, gaar ahaanna loogu talagalay in ay ka faa'idaystaan qoysaska daqligooda dhexdhexaadka ah - iyo kuwa daqligoodu uu hooseeyo. Dowladda Gobolka waxaa looga baahan yahay in ay diyaariso oo ay waaxda HUD u gudbisoo Qorshaha Iskujirka ah ee ay gudbisoo shantii sannadba hal mar. Qorshahan cusub ayaa waaxda HUD loo soo gudbin doonaa kama dambays bisha Maajo 2020.

Muwaadiniinta ayaa waxaa lagu dhiirigelinayaa inay dib u eegid ku sameeyaan oo ay ra'yi ka bixiyaan macluumaadka kujira warbixinta oo laga arki karo <https://thda.org/about-thda/public-notice-and-comment> laga bilaabo 4ta bisha Maarso, 2020. Qabyo qoraalkan oo kooban oo ku qoran af Ingiriisi iyo af Isbanish ayaa sidoo kale la heli doonaa. Faallooyinka oo qoraalka ah oo dhanka elegtaroonigga ah lagu soo gudbiyo bogga internetka THDA waxaan ogolaan doonaa laga bilaabo 4ta Maarso ilaa iyo 20ka Abriil, 2020.

Wakaaladda Horrumarinta Guryaha ee Gobolka Tennessee [The Tennessee Housing Development Agency] (THDA) iyo wadashaqeyayaashooda ayaa qabanaya kullano bulsho ama shirar ku baahsan gobolka oo dhan ay ku qaban doontaa shirkaas oo loola dan leeyahay in bulshada ay maqlaan qorshaha Gobolka ee uu damacsan yahay oo ayna u dhegeystaan faallooyinka dadka ay ka bixinayaan. Wixii la soo bandhigey iyo waxa ku qoran Qorshaha Isku-dhafanka ee hore ayaa la gelin doonaa

<https://thda.org/research-planning/consolidated-planning>. Kullanka sida soo socota ayaa loo qaban doonaa:

Taariikhda & saacadda*	Degmada	Goobta	La xiriir
26 Maarso, 2020 4-6pm	Chattanooga	Southeast TN Development District 1000 Riverfront Parkway Chattanooga, TN 37402	Chuck Hammonds 423-266-5781
30 Maarso, 2020	Cookeville	Upper Cumberland Development District	Tommy Lee

3:30-5:30pm		1104 England Drive Cookeville, TN 38501	931-432-4111
31 Maarso, 2020 3:30-5:30pm	Jackson	Southwest TN Development District 102 E. College St. Jackson, TN 38301	Thomas Skehan 731-668-6429
1 Abriil, 2020 9-11am	Martin	Northwest TN Development District 124 Weldon Drive Martin, TN 38237	Jessica Baker 731-587-4213
1 Abriil, 2020 3-5pm	Memphis	Memphis Area Association of Realtors Education Center 6393 Poplar Ave Memphis, TN 38119	Paul Morris 901-729-2871 (Waxa marti geliyey MAAG)
7 Abriil, 2020 11am-1pm	Nashville	Greater Nashville Regional Council 220 Athens Way, Suite 200 Nashville, TN 37228	Angela Hubbard 615-880-3746
8 Abriil, 2020 9-11am	Mt. Pleasant	South Central TN Development District 101 Sam Watkins Boulevard Mt. Pleasant, TN 38474	Tia Lockridge 931-379-2929
9 Abriil, 2020 10am-duhurka	Knoxville	Farragut Town Hall Community Room 11408 Municipal Center Drive Knoxville, TN 37934	Terry Bobrowski 865-273-6003 (Waxa marti geliyey ETDD)
9 Abriil, 2020 3-5pm	Johnson City	First Tennessee Development District 3211 N. Roan Street Johnson City, TN 37601	Bill Forrester 423-928-0224

*Saacaddaha oo dhan waa saacad maxalli ah.

Ku talagal gaar ah (tusaale ahaan dadka u baahan caawimaad dhanka maqalka ama aragga ama kuwa aqoontooda dhanka luqadda Ingiriisiga ay hooseyso) waa inay 15 maalmood ka hor inta kullanka dhageysiga dadweynaha aan la qaban ka hor si qoraal ah ay ugu soo sheegaan oo ay ula soo xiriiraan Megan Webb. research@thda.org.

THDA Title VI Plan, 2019-2020

615-880-3746	Nashville, TN 37228		دواغی و پرو
ی ج)Tia Lockridge(2929-379-931	ن اوچ دیپ هرینجیلین اوفی وپاش ووری وینسی 101 Sam Watkins Boulevard Mt. Pleasant, TN 38474	Mt. Pleasant	8 ی وینجیل 2020 9 ی و 11 ی و
ی ج ابر و سکی)Terry Bobrowski(865-273-6003 ب ه می و ل دای / خ ل ه خ و ی)ETDD	ژ و و ک و و و ن ه و ی م و ل ی ش ا ر ف ا ر ا و ت 11408 Municipal Center Drive Knoxville, TN 37934	بیل فیل	9 ی وینجیل 2020 10 ی و ب و و و پرو
ی ف ا ر س ت ر)Bill Forrester(423-928-0224	ن اوچی ی ه ک ه میپ هرینجیلین وینسی 3211 N. Roan Street Johnson City, TN 37601	رینجیل و ن س ر ه ی	9 ی وینجیل 2020 5 ی و پاش و پرو

*هه مو و کینک هان ب کینک ی خ و چین.

دا و ک ا ر ه ی م ت ل ی ک ه ا ن ب ه ی ن ه ک م س ر ی ک م ه ی ک ی ش ل ه ی س ت ن ی ا ن و ت ن ی ل ش ا ر م ز ی ک م ه ز م ل ی و ی ک ا ی ز ی ی س ی ا ن ب ه ی ا ر م ق ی ه ی (ه ی ت 15 ر و ژ ی ش ه ی ی گ ش ت ی ه ش و ه ی ن و س ر ا و ب ه ی ک ل ی ب ب ه ن ا و ش ل ی research@thda.org ر ا گ ی ن د و ت).

[illegible]

- بہرن امی ب ش دلیا س درهیلن (HOME) کو ئالیئ THDA فکئی ئی فسمبرن)
 - سن دق اس درهیلن مال و مریکئی (HTF) بھ کو ئالیئ THDA فکئی ئی فسمبرن)
 - ئالک اھلا بئوری و اھلا فکئی ئی فسمبرن (ESG) کو ئالیئ THDA فکئی ئی فسمبرن)
 - بہرن امی د مھینن مال یئو کھینن ب (HOPWA AIDS)، زئی لئی و مزاریق ق دورو سئی یئالیئ سئی فکئی ئی فسمبرن)
- یئعقب درن امه ژ جورھینن هول دقن مال و مریک و گ شریچن جفکئی لس درن اس مریئ سئی لس مر خیرال مال یئلیئ کئی مپ دمر هات و رقی ب شنگھ دکن پلنز گھ یئ دکار کو درهینن کئی ب درن امی اھلا مھ دویئ یئ اماد مکی مبدہ HUD یئعقب درن امی انوو د نا 2020 بئ HUD دی و مرشیل نی.

وہتی یمن ملہا کو زلہا یمن ہی ل راپوٹ کو درجہ اولیٰ <https://thda.org/about-thda/public-notice-and-comment> دا دی لبمر دہستین، ژ ۱۴۱۰ 2020 یمنی کولین و دہپاری و یمنی خومینژن کو تی یمنی شہس ی ب ز ملتی گ ایس ی یسپری ی ی دی لبمر دہستہ ی یمنی یسکی بی ا شری ی ی ی ل م ی ل م را THDA دی ژ ۱۴۱۰ یمنی یس ان (2020) فا و مر ن پەرژل دن.

یو سیٹلگ مریچینڈل مال و مرکب نئی ای سی ای (THDA) و ھسک ایون وئ دل و ھک چئین گ ل ھما مری لس مریچینڈل گھ دئ
لن دار چئ دا کورٹیلو ھک ائیپ مریچینڈل ریک وئ ھک خ لک ییپیزه. ریک مریچینڈل ریک لدار چئینڈل مریچینڈل
ھما دودلی دئ ل ریک شرا ائیپ چئین وئ ھک <https://thda.org/research-planning/consolidated-planning> چئین وئ
دھما ائیپ وئ ائیپ ائیپ:

رؤژ و سئەت*	بازار	شووون	نەئەلی
26ئەدار 2020 4 هەتا 6 پ.ن. (پ.ن. شەتی نەئەرو)	چەئان گە (Chattanooga)	رەئەچە گە شەپەئە دەرەئەش و وری 1000 Riverfront Parkway Chattanooga, TN 37402	چەوک هەمەن دەر (Chuck Hammonds) 423-266-5781
30ئەدار 2020 3:30 هەتا 5:30 پ.ن.	تۆکەئەل (Cookeville)	رەئەچە گە ئۆوینە دەرەئەش و وری 1104 England Drive Cookeville, TN 38501	تۆمەئە لێ (Tommy Lee) 931-432-4111
31ئەدار 2020 3:30 هەتا 5:30 پ.ن.	جەکسون (Jackson)	رەئەچە گە شەپەئە دەرەئەش و وری 102 E. College St. Jackson, TN 38301	تۆمەئە سەکان (Thomas Skehan) 731-668-6429
1ئەئەل 2020 9 هەتا 11 ب.ن. (بەئەئەش و وری)	مەرتین	رەئەچە گە شەپەئە دەرەئەش و وری 124 Weldon Drive Martin, TN 38237	جەسەئە بکەر (Jessica Baker) 731-587-4213
1ئەئەل 2020 3 هەتا 5 پ.ن.	مەمفەئەس (Memphis)	جەئەئەل دەرەئەش و وری 6393 Poplar Ave Memphis, TN 38119	پەئەئەل مۆرەئەس (Paul Morris) 901-729-2871
7ئەئەل 2020 11 ب.ن. (بەئەئەش و وری) 1 – پ.ن.	نەئەئەل	کەئەئەل دەرەئەش و وری 220 Athens Way, Suite 200 Nashville, TN 37228	ئەئەئەل هەبەرد (Angela Hubbard) 615-880-3746
8ئەئەل 2020	Mt. Pleasant	رەئەچە گە شەپەئە دەرەئەش و وری	پەئەل تۆکەئەل

Tia Lockridge(931-379-2929)	101 Sam Watkins Boulevard Mt. Pleasant, TN 38474		9 هقا 11 ب.ن (بەهەڵشەرۆ)
ترەبۆبفۆسکی)Terry Bobrowski(865-273-6003)ب مازوڤلەھا ETDD	ئۆندە جەنن ان باژار ئه‌لوای ئۆئ 11408 Municipal Center Drive Knoxville, TN 37934	نۆکس ڤول)Knoxville(9هقا 2020 10 ب.ن هقا ڤۆ
بیل فۆررستەر (Bill Forrester) 423-928-0224	ڤۆلچ ی لی کەچێگ مێچێدل ئۆئ 3211 N. Roan Street Johnson City, TN 37601	نچیلۆن سەتێ	9هقا 2020 3 هقا 5 پ.ن

*دەم ەمەیل گۆری خوەجەینە.

داخواری لۆجیکان و دەفینتەت (وەک ڤاک کەشێن کو ژبەرە کێش و لایەتێن ئان هتێ ئۆفیس پۆئێ ڤدک ل سەر زەلێ ئۆگێسی
 ەو جەقی بێالکای ئ ە (هەدقی 15 رۆژان بھۆرا جەقێل گ ل ەپەری بێاوی ئۆشک ی بۆ مەگان و بێئ بێلێش ل
research@thda.org بێن راکەلەن.

NOTICE OF PUBLIC HEARING

FOR THE 2020-2024 STATE OF TENNESSEE CONSOLIDATED PLAN HOUSING AND COMMUNITY DEVELOPMENT PROGRAMS

Date/Time:

**Tuesday February 4, 2020
3:30-5:30pm Central Time**

Location:

**William A. Snodgrass Tennessee Tower
Conference Room A (Third Floor)
312 Rosa L Parks Blvd
Nashville, TN 37243**

To join the meeting by phone, please dial 650-479-3208 and enter the access code 802-613-692, followed by #.

The Tennessee Housing Development Agency (THDA) invites you to provide input as it develops the 2020-2024 State of Tennessee Consolidated Plan for housing and community development programs. THDA seeks comments before developing the draft Plan.

The 2020-2024 Consolidated Plan includes the planning, application, and reporting for five U.S. Department of Housing and Urban Development (HUD) grant programs:

Community Development Block Grant (CDBG), administered by the Department of
Economic and Community Development

HOME Investment Partnership Program (HOME), administered by THDA

Housing Trust Fund (HTF), administered by THDA

Emergency Solutions Grant (ESG), administered by THDA

Housing Opportunities for Persons with AIDS Program (HOPWA), administered by the Dept. of Health

These programs support a variety of housing and community development efforts throughout Tennessee, for the benefit of low- and moderate-income households. The State is required to prepare and submit a Consolidated Plan to HUD every five years. This new Plan will be submitted to HUD in May 2020.

The draft Plan will be available for review in March 2020, with a public comment period and additional public hearings.

Special accommodations (e.g. persons needing assistance due to hearing or vision impairments or limited English language proficiency) must be made 15 days in advance of the meeting in writing to Megan Webb at research@thda.org.

Comments may also be submitted via email to research@thda.org until the start of the public comment period.



Attention: This is an important document. If you speak a language other than English, assistance in your language is available, free of charge. Call 1-800-228-8432 (TRS: 7-1-1).

Atención: Esto es un documento importante. Si habla un idioma además de inglés, asistencia en su idioma está disponible, sin costo. Llame al 1- 800-228-8432 (TRS: 7-1-1).

1- 800-228-8432 ١- ٨٠٠-٢٢٨-٨٤٣٢. مجاناً متوفرة لغك في المساعدة فإن، الإنجليزية غير لغة تتكلم كنت إذا. هامة الوثيقة هذه: ملاحظة (TRS: 7-1-1).

Feejignaan: Kan waa dukumentiyi muhiim ah. Haddii aad ku hadasho luuqad aan af Ingiriis ahayn, waxaad heli kartaa caawimaad dhanka luqaddaada ayaan kuu diyaarinay, oo waana bilaash. Soo wac 1-800-228-8432 (TRS: 7-1-1).

注意：这是一份重要文件。如果您使用的语言不是英语，我们可以为您提供免费的语言帮助，请致电 1-800-228-8432 (TRS: 7-1-1)。

주의: 이 문서는 중요한 문서입니다. 영어 외 다른 언어를 구사하시는 경우, 귀하의 언어로 된 도움을 무상으로 받으실 수 있습니다. 다음으로 전화하십시오 1-800-228-8432 (TRS: 7-1-1).

Lưu ý: Đây là tư liệu quan trọng. Nếu quý vị không nói tiếng Anh, chúng tôi có nguồn trợ giúp bằng ngôn ngữ của quý vị miễn phí. Vui lòng gọi số 1-800-228-8432 (TRS: 7-1-1).

زمانی ب ئالیکاری ورتیشاندان، یفیدپه نگلیسی نه زمانی بلی ژ کی زمانه ب تورگه نه. گرینگه ک له گه بی لگه به فی روکانافه: تیبینی. تیکلیی فیه بکه 1- 800-228-8432 (TRS: 7-1-1) ژماراهه ل دگه. سته ده ربه ل پیدراف و لاش به کی ئاوايه ب ته تیکلداری.

شیوهی به ئیوه زمانی به یارمه تی ورتیوتی، ده که ن قسه ئینگلیزی زمانی بیجگه زمانیک به نه گهر. گرنگه به لگه نامه یه کی نه مه: تیبینی. بکه ن په یوه ندی 1-800-228-8432 (TRS: 7-1-1) ژماره ی به. به رده سته له خوړای.

ຖ້າທ່ານເວົ້າພາສາອື່ນທີ່ບໍ່ແມ່ນພາສາອັງກິດ, ມີການຊ່ວຍເຫຼືອທາງດ້ານພາສາບໍ່ເສຍຄ່າໃຫ້. ໂທຫາ 1-800-228-8432 (TRS: 7-1-1).

Cambios en las Audiencias Públicas del Plan Consolidado 2020-2024 de Tennessee

Debido a los nuevos protocolos para mitigar la propagación del COVID-19, la Agencia de Desarrollo de Viviendas de Tennessee (THDA, por sus siglas en inglés) y socios han decidido reprogramar las Audiencias Públicas del Plan Consolidado en persona como audiencias públicas virtuales los días 7, 8 y 9 de abril de 2020. Estas tres nuevas audiencias públicas estarán disponibles para todos los habitantes de Tennessee vía webinar y teléfono. Cada reunión de dos horas comenzará con una presentación sobre el Plan Consolidado, y luego la línea se pondrá a disposición para comentarios públicos. Las audiencias se celebrarán en la Zona Horaria Central.

Se publicarán los detalles de la llamada en las páginas web <https://thda.org/research-planning/consolidated-planning> y <https://thda.org/about-thda/public-notice-and-comment>. O, vea los detalles a continuación.

Martes, 7 de abril de 2020

11am-1pm Zona Horaria Central

Participe vía webinar:

<https://thda.webex.com/thda/j.php?MTID=m0b2f05a6c7417a939f55ea5a3d970fb5>

Participe vía telefónica: 1-650-479-3208 (Código de Acceso: 803 175 370)

Miércoles, 8 de abril de 2020

3-5pm Zona Horaria Central

Participe vía webinar:

<https://thda.webex.com/thda/j.php?MTID=m50afaed33a3c3d7886b718abe5025a26>

Participe vía telefónica: 1-650-479-3208 (Código de Acceso: 282 419 647)

Jueves, 9 de abril de 2020

9-11am Zona Horaria Central

Participe vía webinar:

<https://thda.webex.com/thda/j.php?MTID=md36b17140f941969ee76feb1394a0ff5>

Participe vía telefónica: 1-650-479-3208 (Código de Acceso: 289 803 636)

El período de comentarios públicos está actualmente en curso hasta el 20 de abril. El aviso completo, el proyecto y resumen, el enlace para comentarios, la presentación, las actualizaciones, y otros materiales están, o pronto se pondrán a disposición en la página web <https://thda.org/research-planning/consolidated-planning> y <https://thda.org/about-thda/public-notice-and-comment>.

Sírvase comunicarse con la página web Research@THDA.org para preguntas y solicitudes de adaptación.



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, sex/ 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 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 need 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

Fair Housing Equality Center

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.

***Language Identification Guides** are available in all THDA offices (clearly visible at the front desk & with public facing staff).*



THDA Interpretation Procedures

A **LEP Encounter Survey** (*located on the THDA Intranet*) must be completed for ALL encounters (walk in, phone, etc.) regardless of whether interpretation services or benefits are provided to the LEP person.

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.”

The THDA website may be translated into more than 100 languages using **Google translate**.



Limited English Proficiency

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>
- ✓ Spanish is the most commonly spoken language, other than English, in Tennessee. THDA is in the process of translating vital written documents from different programs, not available from other sources, into Spanish.
- ✓ Oral interpretation of vital written documents in other less common languages may be offered when needed.

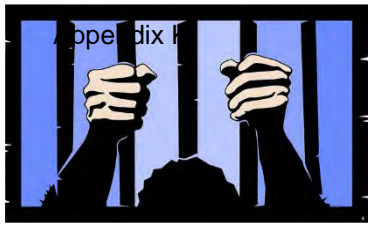


Fair Housing & Criminal History

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 (Non-Discrimination in Services)*
- ✓ 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.*

Discrimination Complaints

THDA provides a **Discrimination Complaint form** and explanation on the website.

Staff must notify **Laura Swanson** of any and all complaints (verbal, written, email) that allege discrimination (even when a complaint is not submitted on the THDA Complaint form).

Responsible Agency & Complaints

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.
- 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



Civil Rights & Housing Activities

ANNUAL REFRESHER TRAINING

Purpose of Training

To ensure all THDA employees are aware of the provisions of each non-discrimination law applicable to THDA activities & familiar with agency non-discrimination policies & procedures.



What is Title VI?

Title VI of the Civil Rights Act of 1964 (43 U.S.C. 2000D) mandates that no person in the United States shall, on the grounds of **race, national origin or color** be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Title VI applies to Federally funded programs & activities.

Discrimination under Title VI

Title VI **prohibits...**

- 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

...on the basis of **race, color or national origin.**

Fair Housing & Discrimination

Title VIII of the Civil Rights Act of 1968, known as the **Fair Housing Act** prohibits discrimination in the sale or rental of housing on the basis of **race, color, national origin, religion, sex/gender, disability & familial status.***

**presence of children under age 18 or pregnancy*

Housing Discrimination

Is a pervasive problem nationwide but is severely under-reported

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



Knowledge is key for housing professionals to help combat discrimination.

In recent years in Tennessee, the most common discrimination complaints are related to **disability & race**.

What Housing is Covered under FHA?

The Fair Housing Act applies to both public & private housing activities by property owners/landlords, agents, brokers, Realtors, and home sellers.

Exemptions: Single-family homes rented or sold without the use of a broker/real estate agent or advertising are exempt as long as the private landlord/owner does not own more than three homes. Owner-occupied rentals with less than four units. Members-only private organizations and clubs.

Tennessee Non-Discrimination Law

Tennessee's state law, the **Tennessee Human Rights Act** prohibits discrimination in housing based on **race, color, creed,* religion, sex, handicap/disability, familial status or national origin.**

**Creed is a set of religious beliefs.*

The **Tennessee Human Rights Commission** is responsible for oversight.



Discriminatory Practices under Fair Housing

In the Sale and Rental of Housing, the following actions are prohibited based on **race, color, national origin, religion, creed, sex/gender, 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, the following actions are prohibited based on **race, color, national origin, religion, creed, sex/gender, 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

In general 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/gender, 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.

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.”*



THDA Non-Discrimination Policy

THDA's **Non-Discrimination in the Provisions of Services** policy was updated recently and is located on the Intranet under *Policies/ Procedures/Legal*.

All staff should read & comply with the policy.

Any questions on the policy may be emailed to **Laura Swanson**, lswanson@thda.org.

National Origin Discrimination



Title VI & the Fair Housing Act prohibit discrimination on the basis of national origin.

- Almost 250,000 Tennesseans (4% of population) speak Spanish (the most commonly spoken language other than English) & almost half speak English less than very well.

Failure to ensure that persons with limited English proficiency (LEP) can effectively participate in THDA's programs & activities may violate regulations against national origin discrimination.

Limited English Proficiency



When individuals have a limited ability to read, write, speak, or understand English, they are **limited English proficient**, or "LEP."

- Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information.



Language Access Plan

THDA's recently published **Language Access Plan** identifies the reasonable steps THDA will take to provide LEP individuals meaningful access to programs & services.

The Plan may be found on the THDA Intranet (for employees) & the THDA Internet (for employees & the public).

All THDA staff should read & comply with THDA's Language Access Plan.



Oral Interpretation

THDA provides **oral interpretation** free of charge through Avaza Language Services to all LEP persons. Procedures are located on the Intranet under *Policies/Procedures (Department EX)*.

- ✓ Avaza supports 120 languages and dialects. Call (615) 534-3400 or (800) 482-8292 to access an interpreter.
- ✓ Language Identification Guides (“I Speak” cards) are available in all THDA offices for persons who come to the office and need assistance.

Notice of Free Language Services



A Spanish language tagline informing LEP persons of free language assistance will be added to vital program documents & notices during 2020 where administratively feasible.

- The notice will include a phone number that is answered by a staff person (during business hours) trained in accessing oral language services.
- A tagline in Spanish, Arabic, Chinese, Vietnamese, Korean, Laotian, Kurdish and Somali (the most commonly spoken languages other than English in TN) is available to be added to vital program documents & notices where a Division determines it appropriate based upon larger LEP populations in service area.

Program documents deemed “vital” by divisions are currently being translated into Spanish. Some program documents are already available in Spanish.

- THDA Title VI Plan, 2019-2020

Language Access Survey



Each time a LEP person requests assistance (oral or written translation), a THDA staff member **MUST** complete the *LEP Encounters Survey* on the Intranet: <https://homestead/Lists/LEP%20Encounter/overview.aspx>.

The survey information allows us to complete required state and Federal reporting annually.



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.



Who Must Consider Accommodation Requests?

A reasonable accommodation request may be submitted to **any person or entity** necessary to afford a person with a disability an equal opportunity to use and enjoy a dwelling.

This may include but is not limited to landlords or property owners/managers, public agencies & entities (including individuals) involved in the provision of housing and residential lending.



Reasonable Accommodation

Each reasonable accommodation request must be considered on a case-by-case basis (no blanket policies) to determine whether the granting of the request is necessary to afford the person with a disability an equal opportunity to use and enjoy their dwelling.

THDA's Section 504 Coordinator (THDA Assistant Legal Counsel) manages all reasonable accommodation requests for the agency.



Reasonable Accommodation Examples

- ✓ Reserved parking space near the dwelling unit for a tenant with a mobility impairment who requires parking.
- ✓ Allow rental payment on a day that corresponds with a disability check
- ✓ In rental assistance programs, an allowance for an extra bedroom for a caregiver or equipment.
- ✓ Allow an assistance animal with no “pet deposit”

Note: An assistance animal is an animal that works, provides assistance, or performs tasks for the benefit of a person with a disability, or that provides emotional support that alleviates one or more identified effects of a person’s disability. An assistance animal is not a pet.



Reasonable Modifications

FHA also makes it unlawful to refuse to allow a person with a disability to make **reasonable modifications** of existing premises if such modifications may be necessary to afford them the full enjoyment of the premises.

Note: Modifications are to be completed at the expense of the person with a disability who made the request, unless the housing is a federally-subsidized, project-based property, in which case the property owner must pay for the modification (this does not include housing that is subsidized by a housing choice voucher).

Discrimination Complaints

The **TN Human Rights Commission** investigates complaints of discrimination under Title VI & the TN Human Rights Act.

- The statute of limitations for filing a complaint with the THRC is 180 days.
- Complaints may be filed online at: <https://www.tn.gov/humanrights/file-a-discrimination-complaint.html> or persons may call 1-800-251-3589.

HUD is the federal agency responsible for enforcing the Fair Housing Act.

- The federal statute of limitations for filing a complaint is 365 days.
- Complaints may be filed online (English or Spanish) at: https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint

THDA Discrimination Complaint Process

Participants in THDA's programs may file a complaint directly with THDA. A Discrimination Complaint form and explanation is posted on the THDA website: <https://thda.org/about-thda/title-vi-compliance>.

A participant in any of THDA's funded programs who asks to file a discrimination complaint should be given the website address for the form; mailed a hard copy &/or referred to Laura Swanson, Civil Rights Compliance Advisor.

- When THDA receives a complaint, it is initially investigated to verify the circumstances. If the complaint alleges discrimination based upon any of the protected classes under Title VI, VIII or the TN HRA, THRC is notified.
- If THDA receives a complaint that is not related to THDA's programs, it is forwarded to THRC &/or HUD for investigation.

Questions



Laura Swanson, THDA
Housing Strategy & Civil
Rights Compliance
Advisor

lswanson@thda.org
615-815-2127

Interested in Learning More

...about the the Civil Rights Act & the quest for equality?

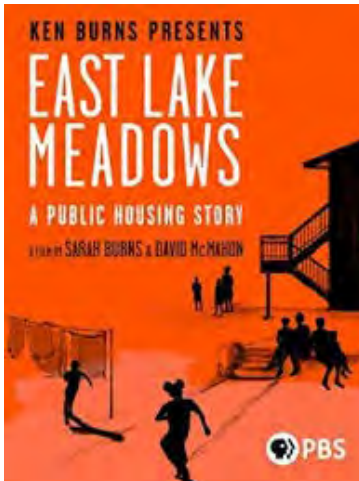


Watch this half hour CBS interview with Martin Luther King from 1967 on the new struggles for equality after the passage of the Civil Rights Act. <https://youtu.be/2xsbt3a7K-8>

Interested in Learning More

Find a program on housing issues & equity to stream online, such as:

Owned: A Tale of Two Americas
(streaming on Amazon Prime)- documentary on the history of American housing policy & shifting perceptions of “home.”



East Lake Meadows, a new documentary by Ken Burns (PBS)- explores the history of a former public housing community in Atlanta & raises critical questions about race, poverty & public assistance.

<https://www.pbs.org/kenburns/east-lake-meadows/>



Tennessee Housing Development Agency Sub-recipient/Grantee (of Federal Financial Assistance) Non-Discrimination in Service Self-Assessment/Survey

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. Title VIII (the "Fair Housing Act") of the Civil Rights Act of 1968 and amendments, along with the Tennessee Human Rights Act (TCA 4-21-601), prohibit discrimination in housing activities on the basis of race, color, religion, national origin, handicap (disability), sex/gender and familial status. Section 504 of the Rehabilitation Act provides that that no qualified individual with a disability should, only by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

THDA has developed this Self Survey as a means of determining sub-recipient/grantee compliance with the various non-discrimination laws; helping sub-recipients understand their Title VI, Fair Housing, THRA & Section 504 responsibilities; and assisting THDA in planning future non-discrimination training and technical assistance.

Sub-Recipient non-discrimination training is mandatory for THDA sub-recipients of Federal funding. All sub-recipient employees who are involved in the administration of THDA's Federal funding should complete non-discrimination training annually, and the training is recommended for volunteers. THDA provides an online training option for sub-recipients of THDA's federal funding that fulfills the training requirement at www.thda.org. Each sub-recipient must complete a Self-Survey form annually and submit the signed form to THDA no later than July 31. The form should be emailed with electronic signatures to: lswanson@thda.org or mailed to Laura Swanson, Civil Rights Compliance, THDA, 502 Deaderick St, Nashville, TN 37243.

Questions or concerns about this Self Survey, THDA's online training or other civil rights issues may be e-mailed to lswanson@thda.org, or you may call Laura Swanson, THDA Civil Rights Compliance Advisor at 615-815-2127.

I. Contact Information & Programs

Grantee Name

Federal ID Number

Street Address

(Area code) Telephone Number

County, City, State, Zip

Title	Name	E-Mail Address
Executive Director or Local Government Official (<i>circle</i>)		
Fiscal Director/Accountant		
Title VI Coordinator		

Name & Title of Person Completing Survey: _____ Date: _____

List the total grant award (and the associated program name and activities related to the grant) for each grant received from THDA for which you requested funds (full or partial draw) during the current fiscal year (even if the grant was awarded in a prior year). Attach a separate sheet if needed or desired.

Program Name	Program Activity (description)	Grant Amount

II. Non-Discrimination Policies & Training

- Does your organization have a written non-discrimination statement regarding the provision of housing benefits or services to all persons without regard to race, color, national origin, sex, religion/creed, familial status or disability? Yes No
- Does your organization have a written policy stating that Limited English Proficiency (LEP) individuals will have access to interpretation and translation services and that the services are free of charge? Yes No
- Does your organization have a written discrimination complaint process for protected classes under:
 - Title VI? Yes No
 - Fair Housing? Yes No
 - Section 504? Yes No
- Do new employees receive training regarding applicable non-discrimination laws; and is such information periodically re-emphasized with employees? Yes No; If YES, please select training method?
 THDA Online Training Classroom (Date(s)): _____
 Other: _____
- How many total employees (new or existing) completed non-discrimination training in the past year: _____.
- Do volunteers receive non-discrimination training? Yes No
- Does your non-discrimination training include LEP procedures? Yes No

III. Title VI/Fair Housing/Section 504 Notification

- Does your organization have a written policy on how individuals are notified about their rights under Title VI, Fair Housing and Section 504 of the Rehabilitation Act? Yes No
 If YES, how are beneficiaries informed? _____
- How often are persons/households receiving services or benefits funded by THDA informed of their rights under Title VI, Fair Housing & Section 504? At initial receipt of services Annually Other (explain): _____
- Are posters containing Fair Housing information with organization contact information prominently displayed within your organization? Yes No
- If minorities and minority group(s) represent a minimum of 5% of the geographic service area population, does your organization utilize media targeting minority populations? Yes No N/A

IV. Discrimination Complaints

- Has your organization made the public aware of the right to file a discrimination complaint & the process?
Yes No; If YES, by what mechanism? _____
- Number of discrimination complaints (Title VI, Fair Housing &/or Section 504) filed with your organization during the survey period: _____
- Number of Title VI, Fair Housing &/or Section 504 investigations completed during the survey period: _____
- In the past three years, has your organization been named in a discrimination complaint or lawsuit?
Yes No
If YES, *attach additional pages to explain* the nature of the complaint or lawsuit; date and the outcome.

V. Board of Directors & Advisory Boards

- List the number of Board of Director members who currently serve on the Board by race/ethnicity. Note: For local governments, this does not include the County Commission or City Council.
Check this box if your organization does not have a Board of Directors.

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

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

- What is the term length for Board of Directors membership? _____
- How are members of the Board of Directors selected
(may attach additional pages)?

**List the number of Board members by race/ethnicity who currently serve on an Advisory Board(s) that contributes to decisions on housing related awards funded by THDA.*

Check this box if your organization does not have any Advisory Boards that contribute to decisions on housing related grants funded by THDA.

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

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

- What is the term length for Advisory Board membership? _____
- How are members of the Advisory Board selected?
- If no Board of Directors and/or Advisory Board members are minorities and minority group(s) represent a minimum of 5% of the geographic service area population, what steps will be taken to obtain minority Board representation? Check box if N/A; otherwise explain:

VI. Demographics

List the number of beneficiaries/households by race/ethnicity participating in each program funded by a THDA grant.

Program/Activity Name	Race				Ethnicity	
	White	African American	Asian	Other	Hispanic	Not Hispanic

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

VII. Limited English Proficiency

- Does your organization have policies and procedures for identifying and assessing language needs of Limited English Proficiency (LEP) applicants/clients? Yes No

If NO, please explain: _____

- Does your organization provide free interpretation services (oral) for LEP persons? Yes No

- Does your organization provide free written translation of vital documents for LEP persons when needed? Yes No

- Have you provided notice to LEP persons in a language they can understand about the right to free language assistance? Yes No

If NO, please explain: _____

- Please provide the number of language encounters or requests for language assistance in the reporting period: *Attach a separate sheet if needed or desired.*

Number of Requests	Language/Language Group (e.g. Spanish)

VIII. Declaration of Respondent

I declare that I have completed the information in this Non-Discrimination in Service Self Survey and to the best of my knowledge and belief, it is true, complete and correct.

Signature*

Print Name

Organization Name

Title

Date

**Check this box if you are a private entity administering a grant on behalf of the grantee/THDA sub-recipient (or a contract administrator).*



EQUAL HOUSING
OPPORTUNITY

Non-Discrimination in Federally Funded Activities

FOR SUB-RECIPIENTS OF THDA'S FEDERAL FUNDING

Purpose of Non-Discrimination Laws

To protect certain classes of people who have historically faced discrimination in:

- The sale, rental, advertising and financing of dwellings and in other housing-related activities
- Programs and activities receiving **Federal financial assistance**

Applicable Civil Rights Laws

Sub-recipients/grantees of THDA's Federal financial assistance are subject to a variety of civil rights laws and regulations. This presentation focuses on:

- ✓ Title VI of the Civil Rights Act of 1964 (24 CFR Part 1)
- ✓ Section 504 of the Rehabilitation Act (24 CFR Part 8)
- ✓ Executive Order 13166 & HUD's Final Limited English Proficiency Guidance
- ✓ Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)

The Fair Housing Act is covered in more detail in a separate presentation.

Sub-recipients of THDA's Federal Financial Assistance

THDA's Federally funded programs with Sub-recipients:

- ✓ HOME Investment (HOME)
- ✓ National Housing Trust Fund (NHTF)
- ✓ Emergency Solutions Grant (ESG)
- ✓ Low Income Energy Assistance (LIHEAP)
- ✓ Weatherization Assistance (WAP)
- ✓ Hardest Hit Fund (HHF) Downpayment Assistance, Blight Elimination (BEP) & Keep My Tennessee Home (KMTH)
- ✓ Principal Reduction Recast Program with Lien Extinguishment (PRRPLE)
- ✓ Appalachian Renovation Loan (ARLP)

Title VI of the Civil Rights Act of 1964

Prohibits discrimination in the following activities on the basis of **race, color, and national origin** in programs with Federal financial assistance.

- 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.

Limited English Proficiency (LEP) & Non-Discrimination

Limited English Proficiency (LEP) individuals do not speak English as their primary language; and/or have a limited ability to read, speak, write, or understand English.

- In certain situations, failure to ensure that LEP persons can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination.
- The Fair Housing Act also prohibits restricting access to housing based on LEP; use of LEP as a pretext for unequal treatment based on race/national origin & selective application of a language-related policy.

LEP & Meaningful Access

Recipients (& sub-recipients) of Federal funds are required to avoid discrimination on the basis of national origin by taking reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

- Meaningful access may include providing language assistance, including oral interpretation and potentially written translation.
- Agencies should budget for language services.

LEP Four Factor Analysis

HUD recommends a **Four Factor Analysis** to determine the actions necessary to ensure meaningful access to LEP persons.

1. Number/proportion of LEP persons in eligible or target population
 - 5% (or > 1,000 persons) of the eligible population is HUD's safe harbor for written translation of vital documents.
 - THDA has completed a county level analysis using Census data that may be accessed by sub-recipients.
2. Frequency of encounters with LEP individuals
 - Agencies should develop a protocol for tracking LEP encounters.
 - The more frequent the contact with a particular language group, the more likely that enhanced language services are needed.

LEP Four Factor Analysis

3. The nature and importance of the program, activity or service provided by the recipient to its beneficiaries
4. The resources available to the grantee/recipient and the costs of interpretation/translation services.
 - Agencies with smaller budgets/less resources are not expected to offer the same level of language assistance as larger agencies with greater resources.

For More Information: www.LEP.gov; Executive Order 13166 & HUD's Final Limited English Proficiency Guidance

Language Access Plan

Where the Census shows more than 5% (>1,000) of the eligible population in the agency's geographic service area speak a language other than English "less than very well," a written **Language Access Plan** should be considered.

- The most common non-English languages spoken in Tennessee are Spanish, Arabic, Asian (Chinese, Korean and Vietnamese) and African languages. Almost 4% of Tennesseans speak Spanish.
- Some counties have far more than 5% (or 1,000 persons) of the population who speak a language other than English, particularly Spanish.

Language Access Plan Components

- When & how **Oral Interpretation** services will be provided to applicants & beneficiaries.
 - Except in emergencies, family members or friends should not be asked to provide interpretation.
 - THDA contracts with a “language service,” which includes a language identification guide to assist staff with identifying the language spoken, and a phone interpretation service.
- If **Written Translation** of “vital documents” in languages other than English will be provided.
 - Consider % of eligible population with LEP; cost & resources available (Four Factor Analysis)
 - HUD has already translated some “vital” program documents into languages other than English that are readily accessible at no cost.

Obligation to Ensure Meaningful Access

If the Four Factor Analysis does not support a written plan for services, **it does not remove the obligation to ensure meaningful access by LEP persons to programs/activities.**

- **Taglines** on websites, public notices & vital documents explaining how to receive free language services may help ensure meaningful access when the sub-recipient agency has a plan for providing individual language services (interpretation or translation).

For example:

English: Language assistance services are available to you or someone you're helping, free of charge.

Spanish: Los servicios gratuitos de asistencia en idiomas están disponibles para usted o para otra persona que usted está ayudando.

Vietnamese: Dịch vụ hỗ trợ ngôn ngữ được cung cấp miễn phí cho quý vị hoặc người mà quý vị đang trợ giúp.

Section 504 of the Rehabilitation Act of 1973

Section 504 -no qualified individual with a disability should, only by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Compliance Areas:

- (1) Program Accessibility; (2) Effective Communication;
- (3) Reasonable Accommodation; (4) Physical Accessibility

Section 504: Program Accessibility

A program or activity, when viewed in its entirety, must be readily **accessible** to and usable by persons with disabilities.

- Section 504 does not require that a person with a disability be accepted without regard to eligibility requirements.
- Section 504 requires that a person with a disability be evaluated using the same objective criteria that are applied to persons without disabilities, provided such criteria are non-discriminatory and subject to reasonable accommodations and the provision of appropriate auxiliary aids and services necessary to ensure effective communication.

Section 504: Reasonable Accommodation

Sub-recipients of Federal funds must ensure that persons with disabilities are able to successfully use or participate in a program, service or activity.

To ensure equal access, a **reasonable accommodation** may be necessary, which is an adaptation or modification to a policy, program, service, or workplace that allows a person with a disability to use or participate fully in a program. An accommodation may include:

- Adjustments or modifications to buildings, facilities, dwellings;
- Modification of a policy or service

Section 504: Reasonable Accommodation

Reasonable modifications to a dwelling unit examples:

- Grab bars, ramp, roll-in shower, widening of doorway, flashing doorbells, handrails.

Reasonable modification of a policy or service example:

- Allowing a service or emotional support animal to live with or accompany a disabled individual where “pets” or animals are not usually allowed.

Recipients (& sub-recipients) of Federal funds must pay for a reasonable accommodation needed by a disabled individual (e.g., a ramp to a unit) unless providing that accommodation would cause an undue financial and administrative burden or a fundamental alteration of the program.

Section 504: Effective Communication

Sub-recipients of Federal funds must ensure **effective communication** that is accessible to persons with disabilities.

- Auxiliary aids and services may be necessary:
 - Interpreters, transcription or captioning services, accessible electronic materials & websites, large print, Braille, & other alternate format materials
 - Not required to provide individually prescribed devices or personalized devices
- Actions that would result in a fundamental alteration in the nature of the program or activity or undue administrative and financial burden are not required.

Section 504: Physical Accessibility

Section 504 requires accessibility for new construction and substantial alteration of housing in Federally funded programs.

- Alterations are substantial when a project has 15 or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility.

*Section 504 design requirements are satisfied when the development meets the technical criteria in the
**Uniform Federal Accessibility Standards
or HUD's Deeming Notice.***

Section 504: Physical Accessibility

An **accessible dwelling unit** is located on an accessible route and can be approached, entered, and used by individuals with physical disabilities.

- A minimum of 5% of the dwelling units, or at least one unit, whichever is greater, shall be made accessible to persons with mobility disabilities
- An additional 2% of the dwelling units, or at least one unit, whichever is greater, shall be made accessible to persons with hearing or visual disabilities.
- Housing provided to persons with disabilities also should not be separate nor unnecessarily segregated from housing provided to individuals without disabilities (i.e. “integrated settings”).

Section 504: Placement in Accessible Units

Suitable efforts must be made to assure that information on the **availability of accessible units** reaches otherwise qualified individuals with disabilities who need the features of those units.

- Offer accessible units to qualified individuals with disabilities before allowing a non-disabled household to occupy the unit.
- Applicants without disabilities on a waiting list for a property may be skipped to offer the unit to the next qualified individual who requires the unit's accessibility features.
- Include clauses in leases requiring a non-disabled family who does not need accessible features to agree to move to a non-accessible unit as soon as one becomes available that otherwise meets the family's needs.

Other Physical Accessibility Standards

Most units built with Federal financial assistance are covered by multiple federal accessibility laws.

- Fair Housing Act (covered in separate module)
- Title II of the Americans with Disabilities Act
- Architectural Barriers Act
- HUD's implementation Regulations (24 CFR Parts 8 and 100)

Compliance with all applicable accessibility laws is necessary.

Where multiple non-discrimination laws apply, the standard that provides the greatest accessibility must be met.

For more information on accessibility standards, visit **the U.S. Access Board** website: <https://www.access-board.gov/>

Other Statutes and Requirements

Section 3 of the Housing and Urban Development Act of 1968

- Applies to recipients of more than \$200,000 from housing and community development programs.
- Requires that employment and other economic opportunities arising in connection with housing rehab, construction or other public construction projects shall be given to low- and very low-income persons (residing in the service area), to greatest extent feasible

Additional Information on Section 3 requirements may be found here: <https://www.hud.gov/sites/documents/11SECFAQS.PDF>

THDA Sub-Recipient Compliance Requirements

Recipients of Federal funds and their sub-recipients must implement a **system of procedures and actions to** administer federally funded activities without discriminating against protected classes. The following activities help ensure non-discrimination in the provision of services & benefits:

1. Appoint a **Non-Discrimination Coordinator**
 - This may be an existing staff member who oversees Title VI, Section 504 & Fair Housing activities & reporting. FT position is not required.
2. Ensure Staff & Volunteers receive Annual **Non-discrimination Training**
 - THDA online training may be used for this purpose
 - Other training from attorney or Fair Housing Professional

THDA Sub-Recipient Compliance Requirements

3. Develop a **Non-discrimination Policy Statement** & post in a public space (including agency website).

THDA's statement: *No staff person or partner of THDA shall engage in discriminatory practices. A discriminatory practice occurs anytime a recipient of or applicant for services is denied services or has some other negative action taken toward that recipient or applicant because of membership in a protected class. Protected classes include: Race, Color, National Origin, Religion/Creed, Sex/Gender, Disability, Familial Status.*

THDA Sub-Recipient Compliance Requirements

4. Ensure Nondiscrimination in the Award of **Contracts**
 - Include **Non-discrimination Assurances in Contracts** (Grantees of HUD programs must use the HUD assurance language)
 - Include Minority and Women Owned Businesses in outreach
 - Use the State of Tennessee, Department of General Services, **Diversity Enterprise Business Directory**
 - Track contractors minority and women's business enterprise status
5. Ensure Non-discrimination in the **Public Participation Process** & in all **Advertisements**
 - Include minorities and women on planning boards and commissions to ensure equal access
 - Be mindful of conducting outreach in traditional & minority publications and use Fair Housing logos

THDA Sub-Recipient Compliance Requirements

6. Engage in & Track efforts to **Affirmatively Further Fair Housing**
7. Develop procedures for providing **meaningful access** to **Limited English Proficient (LEP) Persons**
8. Develop a **reasonable accommodation** process that ensures meaningful access to individuals with disabilities.
9. Follow all applicable **Design Standards** for Physical Accessibility in New Construction & Rehab activities.

THDA Sub-Recipient Title VI Compliance Requirements

10. Develop written **discrimination complaint procedures**.

- Notify applicants & beneficiaries of their right to file a complaint with the sub-recipient, THDA, the state or federal jurisdictional agency. Include contact information for each agency in written procedures.
- Maintain a discrimination complaint log with the complainant name & address, program or service, alleged discriminatory act(s), date of alleged discriminatory act(s), whether the agency determined the alleged discriminatory act(s) occurred, resolution (closed no action or action taken).
- Submit discrimination complaint information to THDA annually.

Sub-recipients may access sample discrimination complaint procedures & forms on THDA's website.

THDA Sub-Recipient Compliance Requirements

- 11.** Submit a **Non-Discrimination in Service Self Survey Form** to THDA annually by **June 30** to report:
- Title VI/Fair Housing/Section 504 Coordinator information
 - Non-Discrimination Statement/Policies
 - Non-Discrimination Training Practices
 - Public Notice Practices
 - Beneficiary Demographics
 - Minority Representation on Boards (race, ethnicity and gender), include explanation of the process to recruit & select Board Members
 - Actions to Affirmatively Further Fair Housing
 - Discrimination Complaint Process with Log
 - Limited English Proficiency Policies & Practices

Responsible Agency & Complaints

U.S. Department of Housing & Urban Development is the federal agency responsible for enforcing the Fair Housing Act.

- Federal statute of limitations for filing a Fair Housing complaint is 365 days.

Tennessee Human Rights Commission (THRC) is the state jurisdictional agency who investigates complaints of discrimination under the TN Human Rights Act.

- 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, THRC will intake and forward the complaint to the appropriate HUD office for investigation.

Non-Compliance & Sanctions

Non-Compliance is the failure or refusal to comply with applicable Civil Rights Laws, and implementing departmental regulations.

*Sanctions for **Non-Compliance** may include:*

- Withholding of payments (federal funds) under the Contract or Award until the non-compliance is corrected;
- Cancellation, termination or suspension of the contract or award in whole or part.

For More Information....

Visit these websites:

HUD Fair Housing & Equal Opportunity

https://www.hud.gov/program_offices/fair_housing_equal_opp

Tennessee Human Rights Commission

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

Tennessee Fair Housing Council

<http://www.tennfairhousing.org/>

Tennessee Housing Development Agency

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

For More Information....

Laura Swanson

THDA Civil Rights Compliance Advisor

615-815-2127

lswanson@thda.org

Emergency Solutions Grant and ESG Phase II (ESG)				
Review Preparation Worksheet				
Agency:				
Project Number:				
City:				
Contact Person:				
Contact Phone Number:				
Director of Agency				
Representatives Present:				
Grant Period Covered:				
Compliance Officer:				
Date of Review:				
Desk Review Conduct Prior to Site Visit				
Application File	Yes	No	N/A	Comments
Review Approved Application and Attachments from Program file				
Other:				
Grant File	Yes	No	N/A	Comments
Review the Executed Grant Agreement				
Note any approved Grant Modifications (if applicable).				
Does this agency utilize sub-recipients agency's for administering the grant?				
What activities was this grant was awarded for? (Street Outreach, Emergency Shelter, Homeless Prevention, Rapid Rehousing assistance, HMIS, Administrative Activities)				

Financial Information	Yes	No	N/A	
Record the budget information				
Obtain copy of audit from agency - If agency expend over \$500,000 in federal funds during the past operating year, agency audit required. (OMB Circular A-133 standards) Review for any audit findings and list if any reported. (be aware of noted audit findings during review)				
Obtain copy of current Program Budget				
Has the agency made changes to the budget? If so, do the changes adhere to the plan established in the application?				
Grant amount and budget category amounts.				
What are the approved budget categories?				
What is the dollar amount of required match for this grant? (Exhibit A grant agreement) Required 1:1				
Agency Financial Management Policies should be requested at the time of scheduling and reviewed in advance of on-site monitoring.	Yes	No	N/A	
Review the Financial Management Policies				
Does the agency's Financial Procedures address the recording of transactions, an account manual, and a chart of accounts?				
Does the agency's Financial Procedures address the maintenance of financial records?				
Does the agency's Financial Procedures provide guidelines for controlling expenditures, such as purchasing requirements and travel authorizations?				
Does the agency's Financial Procedures address the authority for approving financial transactions?				
Obtain copy of most current Authorized Signature Form, Who is authorized to sign checks?				

Agency Policy Review: (policies should be requested at the time of scheduling and reviewed prior to onsite visit.)	Yes	No	N/A	
Review policies for evidence of separation of duties - Are internal controls including segregation of duties defined that effectively reduce the opportunity for an individual to perpetrate or conceal errors or irregularities in financial transactions and in the course of normal duties?				
Review agency procurement procedures - Does the agency's procurement procedures adhere to Federal Procurement Regulations and THDA Policies?				
View agency Personnel Policies				
View agency's Drug Free Workplace Policy				
Obtain a copy of the agency written program policies and procedures (576.400 e) in advance of the review.	Yes	No	N/A	
Do agency policies define program intake system, rent processes, inspection requirements?				
Do the policies reveal language that supports fair housing practices?				
Does the agency have a written non-discrimination Policy and Equal Opportunity Policy? If so, Are services provided to clients without regard to race, color, national origin, sex, religion, disability, familial status, or age?				
Does agency policy adequately address equal access regardless of sexual orientation or identity? Does agency ensure that staff do not inquire about the sexual orientation, gender identity or marital status of an occupant?				
Does the agency have a conflict of interest policy meeting requirements at 576.404?				
Does the agency maintain a privacy protection policy which protects non-published personal client information?				

Agency:				
Project Number:				
City:				
Contact Person:				
Director of Agency:				
Representatives Present:				
Compliance Officer:				
Date:				
Site Review	Yes	No	N/A	Comments
Is the agency location Section 504 Compliant?				
Are Fair Housing Posters prominently displayed at the agency?				
Does file evidence verify that clients are informed of their right to fair housing at application or intake?				
How is the agency's written Grievance Procedure shared with clients?				
Have there been any Fair Housing Discrimination complaints made against the agency during this grant term and if so has THDA been notified of the complaint?				
Does the agency maintain a written language assistance plan?				
Obtain a copy of the Agency Information Sheet				
Does the Agency Information Sheet indicate the agency employs more than 15 people?				
If Agency employs more than 15 people, who is the 504 Coordinator?				
Does the agency comply with 576.405 which states that the recipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or in other equivalent policy making entities?				
Are current or previous clients involved in operation activities of the shelter? (May also involve employment and volunteer opportunities) 576.405 c.				
Is there a designated staff person to ensure McKinney Act and Education Requirements are met?				
If the recipient agency utilizes sub-recipients, are there executed written agreements on file? (applies to cities)				
Are ESG funds utilized for salary costs?				

List staff and title for those persons paid with ESG funds				
Have there been changes in key personnel since application? If yes, was THDA notified of these changes?				
Does a review of Time and Activity sheets reveal ESG paid staff are working on ESG activities? (summary from time sheet tab)				
Are payments for employee salaries supported by timesheets indicating actual times? (Summary from Time and Activity Tab)				
Are the ESG Salaries and wages reported on the invoice based on supporting payroll documentation?				
If salaries are being paid from more than one source, do the fiscal records clearly define payments among the funding sources?				
Are all administrative costs properly classified?				
Are adequate time and activity sheets being used by the agency? (Refer to Time and Activity Sheet tab to input specifics)				
Are all funds used for Financial Assistance and Client Services allocated to the appropriate activity types and NOT to the administrative budget?				
Have admin grant funds been expended for eligible administrative costs? (cities only)				
If this agency is a Domestic Violence Provider, or provides legal services, verify that a data base is in use which generates unduplicated aggregate reports based on the data entered. Verify by viewing the data base and reports that can be generated.				
Are the agency's fiscal records and valuables secured in a limited-access area?				
Do the agency's financial records (bank statements & cancelled checks) indicate that no cash payments were provided directly to the program participants?				
Do the financial records indicate that the grantee has effective internal control over, and accountability of, all grant funds, property and other assets?				

Required total match funds per grant agreement. See Desk review tab				
Does the agency have a record of incoming match funds to date?				
Does the agency have a detailed record of match expenditures to date?				
Are grant expenditures on target to meet the grant requirements by the close of the grant?				
Beds designated for chronically homeless? _____				Beds filled with chronically homeless _____
Beds designated for veterans? _____				Beds filled with veterans _____
How many beds committed for families, youth and children _____				How many beds are filled with family, youth, or children _____
Total slots committed to be served _____				
How many persons are being/ have been served?				
What % of the grant is committed to Rapid Re-Housing?				
Does agency maintain a denied client file ?				
Are clients notified in writing of the reason for their denial of service?				
Are any instances noted in which a family has been denied services based upon the fact that the household has members under age 18? (24CFR576.102)				

HOME PROGRAM EVALUATION

GRANTEE:	YEAR:
CONTRACT ACTIVITIES:	
DATE OF REVIEW:	SAMPLE SIZE:
PROGRAM SPECIALIST:	
PERSON INTERVIEWED:	

COMPLIANCE AREAS CHECKED:

	YES	NO	N/A
Attachment A requirements (if applicable) have been met? List any requirements:			
Environmental Review Record is on file.			
Did the Grantee use an Unspecified Site Strategy?			
If yes, is the site specific checklist in the individual records?			
Date Rec'd at THDA			
Date of cleared letter			
Period of Availability of Funds. Did all activities occur within the grant term? (Contract B.1)			
Public Accountability. Does Grantee display required sign? (Contract D.9)			
Public Notice. Does Grantee include required language in all public notices? (Contract D.10)			
Annual Report and Audit. (Contract D.15)			
Drug-free Workplace Policy (Contract E.11) Date adopted:			
Is the Policy of Non-discrimination posted conspicuously so all interested parties can see it?			
Does Grantee have written policies of non-discrimination and provide Title VI training for employees?			
Does Grantee collect racial/ethnic data for program participants?			
Are there written hiring policies or personnel policies?			

TITLE VI COMPLIANCE /EQUAL OPPORTUNITY/FAIR HOUSING

	YES	NO	N/A
Are efforts made to inform the community and/or minorities of vacancies?			
Copy of job advertisements includes EEOC statement?			
Are there copies of advertisements for employment and documentation regarding the subsequent applications and individuals hired?			
Is there any indication of a violation of EO/FH policies?			
Have complaints been filed?			
Was the project publicly bid?			
Date(s) of bid(s):			
Is the bid advertisement on file?			
Is the Minority/Female Business Directory on file?			
Is there documentation that efforts were made to contact minority/female firms?			
Were efforts made to contact minority/female firms in the county and/or surrounding counties?			
Is the Contractor/Subcontractor Activity Report (EO-4) completed and on file?			
Is the Section 3 Questionnaire (EO-5) completed and on file?			
Is documentation of the Fair Housing Activity (EO-8) on file?			
For rental or homeownership projects with 5 or more units, is there an affirmative marketing plan?			
Is there documentation to show that the plan is being followed?			

RENTAL HOUSING PROGRAMS

Property Owner: _____

Property Address: _____

Number of Units: _____

YES**NO****N/A**

If this is a third-party rental, is there a subrecipient agreement?

☐☐☐

Are there rental policies or a management plan which have been adopted for the operation of the rental program?

☐☐☐

How are waiting list maintained?

Is there an established tenant selection process with policies available to applicants?

☐☐☐

Is there documentation to demonstrate that the selection process is being followed?

☐☐☐

Is there adequately trained staff to determine tenant eligibility?

☐☐☐

Is the Grantee taking appropriate steps to ensure that composition of units meets income guidelines for initial and long-term occupancy?

☐☐☐

For Multi-family projects, is the level of HOME Subsidy within State Limits?

☐☐☐

Number of units: _____ Total HOME subsidy: _____

Is there a 12-month lease with tenant protections?

☐☐☐

RENTAL HOUSING REHABILITATION OR NEW CONSTRUCTION

	YES	NO	N/A
Site Specific Checklist, if applicable?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are contracts and work write-ups on file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contractor Bid Tabulation? (list contractors/bids)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contractor's Certification of eligibility to participate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contract for Rehabilitation or Construction? Contractor Name: Date: _____ Amount: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-Kickback Certification?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notice to Proceed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dates of Inspection Reports?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Change orders: #1 #2 #3 Final Amount:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Final Invoice, Release of Liens and Warranty?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Certification of Completion and Final Inspection? Date: _____ Amount: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Copies of cancelled checks to contractors:				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Check #:	Amount#:	Date:				
Check #:	Amount#:	Date:				
Check #:	Amount#:	Date:				
Check #:	Amount#:	Date:				
Check #:	Amount#:	Date:				
Check #:	Amount#:	Date:				
Check #:	Amount#:	Date:				
Check #:	Amount#:	Date:				
Check #:	Amount#:	Date:				
Check #:	Amount#:	Date:				

Receipt of final payment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Grant Note (Promissory note) Date: _____ Amount: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Recorded Deed of Trust? Book: ____ Page(s): _____ Date: _____ Amount: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Recorded Restrictive Covenant? Affordability Period: _____ years Book: _____ Page(s) _____ Per unit HOME subsidy: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site Visit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the completed work appear to be satisfactory and consistent with the contract/work write-ups?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

LEAD-BASED PAINT REQUIREMENTS

RH-5: Disclosure of information on LBP?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Visual assessment of all painted surfaces by qualified inspector or Risk Assessment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
LBP-3: Clearance Report?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Level of HOME Subsidy within State Limits? Number of Bedrooms: Home Subsidy:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

INDIVIDUAL TENANT RECORD

NAME: _____

ADDRESS: _____

	YES	NO	N/A
Is the tenant's application on file? Date: _____ Household size: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is total household income verified? Date of verification: _____ Amount: _____ Source: _____ Date of re-certified: _____ Amount: _____ Source: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is income within required guidelines? County Program Limit for household size: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there a completed lease agreement? Original Lease Date from: _____ to _____ Amount: _____ Renewal Lease Date from: _____ to _____ Amount: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Fair Housing-Equal Opportunity for All</i> Notice (EO-8)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there a signed Lead-Based Paint Disclosure (RH-5)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Utility Allowances for this unit? Amount: _____ Date: _____ Applicable HUD utility allowance for this unit: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is the rent within HOME rent limits? # of bedrooms: _____ Current rent charged for this unit: _____ HUD HOME rents for this unit: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

LIHEAP Agency: _____ Contract #: _____

Person Interviewed: _____ Title: _____

Date: _____ 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 THDA State website? Is the LIHEAP application available on any other agency website? If yes, please list insert link.
4. Does the agency assist applicants, as needed, with the completion of their applications? Please list any non-agency partners that assist LIHEAP applicants with filling out applications.
5. Describe your agency's process for accepting regular LIHEAP applications?
6. Does the agency accept applications for crisis assistance through the contract period regardless of the availability of funds? (Provide copy of county budget allocation)
7. When available funds are expended, does the agency maintain a waiting list during the contract period with carry over to the next funding cycle?
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? List all forms and documentation placed in an applicant file.
10. Describe the referral process for LIHEAP applicants who are interested in weatherization assistance for the Weatherization Assistance Program.

B. Eligibility Determination

1. Are applications reviewed, eligibility (approved/denied) determined, within 30 days and was the benefit applied within 90 days?
2. Describe the process when an incomplete LIHEAP application is received?
3. 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?
4. How does the agency handle households with members that do not have a Social Security Number?
5. How does the agency handle households with members that refuse to provide a SSN?
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?
 - c. What is the agency process if an applicant provides less than 12 months of energy usage?
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. Please provide the name and title of the staff 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? (Please provide a copy of most recent review)

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. What procedures in place to safeguard the confidentiality of customer files to ensure that only authorized personnel have access to the records?
2. Are employees trained on client confidentiality, ethical conduct and release of information?
3. Does the agency hold mandated HIPPA Compliance training annually? Is the training documented?
4. Is access to client files restricted?
5. Who has access to client files?
6. How are files secured during working hours?
7. How are files secured after working hours?

8. How long do you maintain client records and what is the process for securing records on and off-site?

D. Vendor Agreements with Home Energy Suppliers

1. Are vendor agreements in place for those energy suppliers that are receiving payments? (A randomly selected Vendor Agreement will be copied)
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? When are checks completed and how are they documented? (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?
4. How are informal complaints documented and resolved?
5. Does the agency post appeals and grievance procedures? If so, where is the posting located?

F. Assurance 16 Activities

1. Does the agency participate in Assurance 16 Activities?
 - a. Explain what activities are utilized for Assurance 16?
 - b. Explain what current activities have been completed to date and provide documentation of activities?
 - c. What are the proposed indicators of success or impact of your agency's Assurance 16 activities (what your agency measures or assesses to determine success or impact)? For example, indicators of success for energy education classes could include increased knowledge of households about energy usage or their actual energy usage.
 - d. What kinds of data collection or information gathering techniques does your agency use to measure the success of the Assurance 16 program (i.e. surveys, etc.)? Please provide documentation.
2. How much of the agency's budget is spent on Assurance 16 Activities?

G. Outreach Questions

- a. Explain the outreach activities and partnerships that have been completed to date for reaching targeted populations (i.e. elderly, individuals with disabilities, and families with children under 6).
- b. Does your agency track outreach activities in order to evaluate which events/sites were more effective than others?
- c. What other ways does your agency assess the effectiveness and success of your outreach efforts?

H. Other Questions

1. Does the agency have termination of services process and procedures in place in the event assistance is terminated due to a violation of program requirements? Is there a timeframe for how long the services will be terminated? (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. Is a Conflict of Interest policy/statement that is signed by all employees involved with the LIHEAP program? (A current signed statement will be requested for review while on-site)
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?

I. 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 and where are postings located?
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 with any services being provided 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:

LIHEAP Remote Monitoring Instructions

Summary

THDA is moving to remote desk top monitoring starting April 20, 2020 to ensure annual program monitoring stays on track for program year 2020. This change was necessary due to the suspension of all state travel during the COVID-19 national emergency. These instructions will provide guidance on how the monitoring process will work, what documentation will need to be sent through regular email or through the secure EDT site.

LIHEAP Notification Letter

Notification Letters for monitoring dates will be sent out 2 weeks in advance prior to the monitoring date.

LIHEAP Notification Email Package

The email package will still include notification on the number of files that will be reviewed for regular, crisis, denied and pending applicants. The LIHEAP Specific THDA Spreadsheet, LIHEAP Agency Program Questionnaire and the Remote Agency Check-list will be attached to the email for your review. This will be sent out no later than one week before the scheduled monitoring date.

Client Files

The client files will still be randomly selected for each agencies from program year 2020 (October 1, 2019 through present date). The Client Summary List will still be emailed to the agency the day before the remote monitoring is scheduled to start. Agency Program Managers will upload the client files to the secure EDT site. This is the same site where invoice information is uploaded. If the staff member designated to upload the documents into the EDT site does not have a user name please contact THDA Program Manager, Blake Worthington for assistance. Please upload all applicant files into one categorized PDF file separated by Regular, Crisis, Denied and Pending (i.e. crisis pdf, regular pdf, etc.).

Regular

This should include the LIHEAP signed and date stamped application, income documentation, social security documents/birth certificate for children under 1 year of age, government issued identification for the head of household, Vouchers, ACCENT documents, 30 day Notification and/or Pending Letters and utility usage documents. If cases required additional documentation to make applicant's qualified for additional priority points please upload the documentation.

Crisis

Please see the description found in the Regular heading. In addition please upload documentation required for shut-off notice and uncontrollable circumstances.

Denied

Please see the description found in the Regular heading. In addition please upload the THO Denial Letter with the applicant files.

Pending

Please see the description found in the Regular heading. In addition please upload the Pending THO application.

Any additional documentation requested by the monitor that is considered sensitive and confidential should be uploaded to the EDT site for security purposes.

Day of Monitoring

An entrance interview will be conducted with key staff members which should include the Executive Director, Program Manager and Finance staff. The THDA Program Manager and Compliance Monitor will be facilitating the meeting.

The purpose of this monitoring is to: (but not limited to)

- Ensure client eligibility is performed in accordance with LIHEAP policies and procedures
- Review LIHEAP Applicant files for accuracy and completeness
- Verify application notification and payment dates
- Verifying benefit determination, priority points and energy burden
- Verifying deliverable fuels and payment vouchers are documented in file
- Confirming crisis assistance eligibility
- Verify applicants are being notified of the Fair Hearing and Appeals process
- To ensure postings to detect waste, fraud, abuse are posted
- Agency photos of intake interview location(s) and client file location
- Get an update status of program Outreach and Assurance 16 activities
- To discuss any barriers or concerns the agency is experiencing

WebEx & Teleconference Call

A WebEx or teleconference call invitation and instructions will be sent to the agency 2 days prior to the scheduled monitoring date. Entrance Interview will

Vendor Agreements

Current Signed Agreements

Each agency will be asked to review the Vendor tab in the LIHEAP Specific THDA Spreadsheet to make sure all vendor agreements listed are still in good standing. If no new Vendors Agreements have been signed for the 2020 PY please upload one current signed agreement and the corresponding SAM search documentation for review.

New Signed Agreements

If an agency has any new signed agreements for the 2020 PY please upload those to the EDT site along with the SAM search documentation.

Photos

Client File Location

Please upload a picture of where client applicant files are secured along with a description of where the files are located.

Intake Interview Area

Please upload a picture of the intake interview area for the agency. If an agency has multiple intake site please send a photo of each of the site intake interview areas.

Fraud, Waste and Abuse Posting

Upload a picture of the posting located in common areas for staff and applicants can view the toll free number.

Title VI & Limited English Proficiency Posting

Upload a picture of the Title VI and LEP posted in common areas for applicants to view.

Client Grievance and Appeals Process Posting

Upload a picture of the Title VI and Appeals Process posted in common areas for applicants to view.

Entrance & Exit Interview

The entrance interview will be conducted the day of the monitoring review and will address any questions the agency may have regarding the monitoring process and for the agency to share any concerns they have serving LIHEAP applicants.

The exit interview will be conducted at the end of the monitoring review. The THDA monitor will address any discrepancies found in the reviewed files. Once the monitor has had time to confer with the THDA LIHEAP team a final monitoring report will be sent 30 business days from the date the monitoring review ends. The agency will be required to address any findings 15 days from the time they receive the report with a corrective action plan.

THDA WAP/LWx, Title VI and Civil Rights Compliance Monitoring Questions

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).

Appendix O

Program	Subrecipient/ Contractor Name	Begin/ End Dates	Amt of Contract	M/ WBE	Desc of Services	Address	Funding	Type of Contract	Competitive/ NonComp	Statement of Assurance	New Contract	Non-Discrimination in Services Survey	Notes
Contracts	C-MAX FHA Claim Management	7/1/2018 - 6/30/2021	\$ 72,000	N/A	FHA Claim Management	Addison, TX	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Allregs/Sallie Mae	8/1/16-7/31/21	\$ 10,000	N/A	Subscription banking regulations	Washington, DC	THDA	Vendor	NonComp	No	No	n/a	
Contracts	Assurant	3/21/18-3/20/2023	\$ 100,000	N/A	Property Valuation Services	Chicago, IL	THDA	Vendor	Comp	Yes	No	n/a	
Contracts	ASTA-USA	7/1/2020 - 6/30/2021	\$ 20,000	N/A	Translation Services	Cheyenne, WY	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Bliss Communications	8/20/18-12/15/19	\$ 5,000	WBE	Leadership Training	Nashville, TN	THDA	Vendor	NonComp	No	No	n/a	
Contracts	Bob McKown & Company	2/1/2019-12/31/2019	\$ 10,000	N/A	Whole Brain Leadership Workshop	Lebanon, TN	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Bohan - Media Buyer Campaign	2/1/2020 - 12/31/2021	\$ 1,350,000	N/A	Media Buyer Great Choice Campaign	Nashville, TN	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Brock & Scott	3/21/18-3/20/2023	\$ 100,000	N/A	Foreclosure Legal Services	Wilmington, NC	THDA	Vendor	Comp	Yes	No	n/a	
Contracts	Carasoft - TALX Corporation (dba Equifax "Work Number")	11/1/2019 - 10/31/2024	\$ 300,000	N/A	S8RA Employment Verification Service	St. Louis, MO	Federal	Vendor	NonComp	No	Yes	n/a	
Contracts	CGI Federal	3/1/15-9/30/20	\$ 7,200	N/A	Agency-wide notification system	Cleveland, OH	THDA	Vendor	NonComp	No	No	n/a	
Contracts	CGI Federal	10/15/18-10/14/23	\$ 2,000,000	N/A	S8RA Inspection Services	Cleveland, OH	Federal	Vendor	Comp	No	No	n/a	
Contracts	CGI-AMS -CAV Software	3/1/15-2/28/2022	\$ 410,000	N/A	S8CA Software Maintenance & Support	Atlanta, GA	Federal	Vendor	NonComp	No	No	n/a	
Contracts	Christin & Associates	11/1/17-10/31/20	\$ 49,500	N/A	Elite Software Consultant	Petoskey, MI	Federal	Vendor	Comp	Yes	No	n/a	
Contracts	Cobblestone Systems Corp	6/1/17-5/31/22	\$ 80,000	N/A	Contract Management Software	Somerdale, NJ	THDA	Vendor	NonComp	No	No	n/a	
Contracts	Community Housing Partners	4/1/13-6/30/22	\$ 2,250,000	N/A	WAP Training and Inspections	Chrstianburg, VA	Federal	Vendor	Comp	No	No	n/a	
Contracts	Compass Auctions & Real Estate	3/21/18-3/20/2023	\$ 100,000	N/A	Foreclosure Auction Services	Hixson, TN	THDA	Vendor	Comp	Yes	No	n/a	

Program	Subrecipient/ Contractor Name	Begin/ End Dates	Amt of Contract	M/ WBE	Desc of Services	Address	Funding	Type of Contract	Competitive/ NonComp	Statement of Assurance	New Contract	Non-Discrimi nation in Services Survey	Notes
Contracts	CoreLogic	5/5/19-5/4/25	\$ 37,000	N/A	Housing Market Data	Dallas, TX	THDA	Vendor	NonComp	No	No	n/a	
Contracts	CoreLogic	6/15/16-6/14/21	\$ 100,000	N/A	Escrow & Claims Processing Services	Dallas, TX	THDA	Vendor	NonComp	No	No	n/a	
Contracts	Creative Energy	2/2/15-2/1/2020	\$ 2,619,800	WBE	Media Planning and Buying Services	Johnson City, TN	THDA	Vendor	Comp	No	No	n/a	
Contracts	Darkstar Digital	4/23/20-6/30/2020	\$ 49,500	N/A	Website Redesign	Hermitage, TN	THDA	Vendor	Comp	No	Yes	n/a	
Contracts	Darkstar Digital	7/1/2020 - 6/30/2025	\$ 15,000	N/A	Web Maintenance & Hosting	Hermitage, TN	THDA	Vendor	Comp	No	Yes	n/a	
Contracts	DLS - WaterfallCalc	11/1/17-11/1/2020	\$ 135,000	WBE	FHA Loss Mit Software Program	Grand Rapids, MI	THDA	Vendor	NonComp	No	No	n/a	
Contracts	DLS Servicing Consultants, LLC	4/13/16-4/13/2021	\$ 645,000	WBE	Loan Servicing Compliance	Grand Rapids, MI	THDA	Vendor	NonComp	No	No	n/a	
Contracts	Dozen Software (formerly FloCode)	10/1/2019 - 9/30/2021	\$ 100,000	N/A	THELMA HOS	Nashville, TN	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Easy Data - Loan Protector	6/1/2020 - 5/31/2023	\$ 70,000	N/A	Loan Protector Services SOW	Solon, Ohio	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Emphasys Computer Solutions - SocialServe	3/1/14-2/28/20	\$ 960,000	N/A	SocialServe S8 Rental Database System Maintenance & Support	Charlotte, NC	Federal	Vendor	NonComp	No	No	n/a	
Contracts	Emphasys Computer Solutions - SocialServe	2/1/2020 - 1/31/2023	\$ 621,000	N/A	SocialServe S8 Rental Database System Maintenance & Support & Disaster Recovery	Charlotte, NC	Federal	Vendor	NonComp	No	Yes	n/a	
Contracts	Emphasys Computer Solutions	9/1/14-8/30/19	\$ 215,000	N/A	S8RA HCV Software (Elite)	Charlotte, NC	Federal	Vendor	NonComp	No	No	n/a	
Contracts	Emphasys Computer Solutions (Elite)	11/11/2019 - 10/31/2024	\$ 370,000	N/A	S8RA HCV Software (Elite)	Charlotte, NC	Federal	Vendor	NonComp	No	Yes	n/a	
Contracts	Equifax Credit agreement	6/1/2020 - 6/1/2025	\$ 25,000	N/A	Credit Reporting	Chicago, IL	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Executive Selection, Inc.	1/28/2019 - 12/31/2019	\$ 10,000	N/A	Leadership Development	Nashville, TN	THDA	Vendor	NonComp	No	Yes	n/a	

Program	Subrecipient/ Contractor Name	Begin/ End Dates	Amt of Contract	M/ WBE	Desc of Services	Address	Funding	Type of Contract	Competitive/ NonComp	Statement of Assurance	New Contract	Non-Discrimination in Services Survey	Notes
Contracts	Fearnly Martin & McDonald, PLLC	12/20/10 - 12/19/20	\$ 3,167,000	N/A	HHF Title Closing Services and Consultations	Memphis, TN	Federal	Vendor	Comp	No	No	n/a	
Contracts	FICS	6/1/16-5/30/21	\$ 555,000	N/A	Loan Servicing Software	Addison, TX	THDA	Vendor	NonComp	No	No	n/a	
Contracts	First Rate Field Services	3/21/18-3/20/2023	\$ 100,000	N/A	Property Preservation Services	Clayton, MO	THDA	Vendor	Comp	Yes	No	n/a	
Contracts	First Tennessee Bank	9/1/16-8/31/21	\$ 500,000	N/A	Lockbox Services	Nashville, TN	THDA	Vendor	Comp	No	No	n/a	
Contracts	Five Brothers	9/1/16-8/31/21	\$ 100,000	N/A	Property Preservation Services	Warren, MI	THDA	Vendor	Comp	No	No	n/a	
Contracts	Haile Coaching & Leadership LLC	2/25/2019 - 12/31/2019	\$ 10,000	N/A	Leadership Training	Nashville, TN	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Hampton Inn & Suites - Advisory Board Mtg	2/20/2020-3/15/2020	\$ 1,713	N/A	Advisory Board Mtg Accomodations	Nashville, TN	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Hatteras	9/1/16-8/31/21	\$ 500,000	N/A	Statement Services	Dearborn, MI	THDA	Vendor	Comp	No	No	n/a	
Contracts	HBEI 2020 Housing Education Symposium	7/19/2020-7/21/2020	\$ 70,000	N/A	Mtg space, Catering, etc	Nashville, TN	THDA	Vendor	Comp	No	Yes	n/a	
Contracts	HBEI Housing Education Symposium - Marriott Vanderbilt	7/18/2021 - 7/20/2021	\$ 70,000	N/A	HBEI Training Services	Washington, DC	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	HomeSource	11/1/15-6/30/2020	\$ 21,600	N/A	S8RA Meeting Space	Knoxville, TN	Federal	Vendor	NonComp	No	No	n/a	
Contracts	Independent Settlement Services	3/21/18-3/20/2023	\$ 100,000	N/A	Property Valuation Services	Chicago, IL	THDA	Vendor	Comp	Yes	No	n/a	
Contracts	J Phillip Jones	10/16/16-10/15/2021	\$ 500,000	N/A	Foreclosure Services	Nashville, TN	THDA	Vendor	Comp	No	No	n/a	
Contracts	Lee Hecht Harrison	11/1/2019 - 10/31/2022	\$ 40,000	N/A	Job Placement Services	Nashville, TN	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	LexisNexis - Information Database for Government Collections	5/1/2017 - 4/30/2022	\$ 24,000	N/A	Info database for Government Collections	Albany, NY	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Marshall & Swift	11/1/17-10/31/22	\$ 18,000	N/A	Commerical/Agricultural Calculations	Chicago, IL	THDA	Vendor	NonComp	No	No	n/a	

Program	Subrecipient/ Contractor Name	Begin/ End Dates	Amt of Contract	M/ WBE	Desc of Services	Address	Funding	Type of Contract	Competitive/ NonComp	Statement of Assurance	New Contract	Non-Discrimi nation in Services Survey	Notes
Contracts	Memphis Property Services	9/1/16-8/31/21	\$ 100,000	N/A	Property Preservation Services	Memphis, TN	THDA	Vendor	Comp	No	No	n/a	
Contracts	MoneyGram	12/1/17-11/30/2021	\$ 100,000	N/A	Wire payment Services	Minneapolis, MN	THDA	Vendor	NonComp	No	No	n/a	
Contracts	Montgomery State Park - 2019 S8RA Statewide Training Venue	4/26/2019-7/15/2019	\$ 15,750	N/A	Section 8 Rental Assistance Training	Burns, TN	Federal	Vendor	NonComp	No	Yes	n/a	
Contracts	Mortgage Bankers Association	8/1/19-8/31/20	\$ 4,851	N/A	Servicing Training	Washington, DC	THDA	Vendor	NonComp	No	No	n/a	
Contracts	MSI LLC	3/21/18-3/20/2023	\$ 100,000	N/A	Property Preservation Services	Fort Worth, TX	THDA	Vendor	Comp	Yes	No	n/a	
Contracts	MTSU	11/1/18-9/30/19	\$ 7,500	N/A	Housing Market Reports	Murfreesboro, TN	THDA	Vendor	NonComp	No	No	n/a	
Contracts	MTSU	10/1/19-8/31/2020	\$ 7,500	N/A	Housing Market Reports	Murfreesboro, TN	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Music City Center - TNHC Venue License & LMG Audio Visual	9/1/2019-3/13/2020	\$ 143,446	N/A	Venue License and A/V	Nashville, TN	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Naifeh Center for Leadership - 2019 S8RA Statewide Training	7/9/2019-7/10/2019	\$ 2,000	N/A	Section 8 Rental Assistance Training	Knoxville, TN	Federal	Vendor	NonComp	No	Yes	n/a	
Contracts	NDC Chapter 13 Bankruptcy Data	10/1/2019 - 9/28/2021	\$ 9,600	N/A	Chapter 13 Data	Lafayette, CA	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	NeighborWorks America	3/23/2020 - 12/27/2020	\$ 12,840	N/A	HBEI Training Services - Train the Trainer	Washington, DC	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	NeighborWorks America	3/23/2020 - 3/27/2020	\$ 29,900	N/A	HBEI Training Services	Washington, DC	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	NeighborWorks America	3/11/2020 - 3/11/2020	\$ 6,700	N/A	HBEI Training Services	Washington, DC	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	NewCourse	5/15/18-5/14/23	\$ 500,000	N/A	Monthly Statements	Nashville, TN	THDA	Vendor	Comp	Yes	No	n/a	
Contracts	Novogradac & Co LLP	7/1/18-6/30/2022	\$ 200,000	N/A	Property Appraisals	Bethesda, MD	Federal	Vendor	Comp	No	No	n/a	

Appendix O

Program	Subrecipient/ Contractor Name	Begin/ End Dates	Amt of Contract	M/ WBE	Desc of Services	Address	Funding	Type of Contract	Competitive/ NonComp	Statement of Assurance	New Contract	Non-Discrimination in Services Survey	Notes
Contracts	Online Rental Exchange	7/1/2014 - 6/30/2021	\$ 165,000	N/A	S8RA Criminal Background Checks Online Services	Winterville, NC	Federal	Vendor	NonComp	No	No	n/a	
Contracts	Oracle/Taleo	4/23/18-4/22/2023	\$ 55,280	N/A	Applicant Tracking Hosted Software	Redwood Shores, CA	THDA	Vendor	NonComp	No	No	n/a	
Contracts	Oracle/Taleo /RecruitingDash	10/23/2017 - 10/22/2023	\$ 200,000	N/A	Applicant Tracking	Dallas, TX	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Palmer Solutions Leadership Academy	10/1/2019-12/20/2019	\$ 8,000	N/A	session; Conversational Intelligence	Bradenton, FL	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Palmertech Consulting, LLC	1/18/19-1/17/2021	\$ 750,000	N/A	IT Consulting and Development Services	Grimes, IA	THDA	Vendor	Sole Source	No	No	n/a	
Contracts	Paymentus	9/1/16-8/31/21	\$ 50,000	N/A	Pay by Phone Services	Charlotte, NC	THDA	Vendor	Comp	No	No	n/a	
Contracts	PHR Parkway / US Bank File On-Site Storage	6/18/2018 - 5/31/2023	\$ 18,000	N/A	On-Site File Storage	Nashville, TN	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	PolicyMap Subscription	3/1/2019-2/29/2020	\$ 2,100	N/A	Subscription Service	Philadelphia, PA	THDA	Vendor	NonComp	No	No	n/a	
Contracts	Preston Provenance Hotel Block	10/28/2019-10/31/2019	\$ 3,000	N/A	Hotel Room Block for HBEI	Nashville, TN	THDA	Vendor	Comp	No	Yes	n/a	
Contracts	Raxis	4/15/2020 - 6/30/2022	\$ 49,200	N/A	Penetration Testing	Atlanta, GA	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	RSM (formerly McGladery)	2/16/15-12/31/2020	\$ 5,000,000	N/A	IT Consulting for LIHTC/Authority DMS System	Minneapolis, MN	THDA	Vendor	NonComp	No	No	n/a	
Contracts	Rubin Lublin	10/16/16-10/15/2021	\$ 300,000	N/A	Foreclosure Services	Peachtree Corners, GA	THDA	Vendor	Comp	No	No	n/a	
Contracts	SpotMe - HBEI Virtual Platform	6/15/2020-7/22/2020	\$ 6,500	N/A	Virtual hosting	New York, NY	THDA	Vendor	Comp	No	Yes	n/a	
Contracts	TalentQuest	7/1/14-6/30/2022	\$ 200,000	N/A	Performance Management Software Maintenance and Support	Atlanta, GA	THDA	Vendor	NonComp	No	No	n/a	
Contracts	TENA Companies	7/18/2018-7/17/2019	\$ 49,000	N/A	Servicing Quality Control Consultant	St. Paul, MN	THDA	Vendor	Comp	No	No	n/a	
Contracts	TENA Companies	2/1/2020 - 1/31/2025	\$ 150,000	N/A	Servicing Quality Control Consultant	St. Paul, MN	THDA	Vendor	Comp	No	Yes	n/a	

Program	Subrecipient/ Contractor Name	Begin/ End Dates	Amt of Contract	M/ WBE	Desc of Services	Address	Funding	Type of Contract	Competitive/ NonComp	Statement of Assurance	New Contract	Non-Discrimi nation in Services Survey	Notes
Contracts	Tennessee Association of Broadcasters	1/23/19-9/2/19	\$ 30,000	N/A	Great Choice Radio Spots Placement	Nashville, TN	THDA	Vendor	NonComp	No	No	n/a	
Contracts	Tennessee Performing Arts Center	7/1/19-7/30/19	\$ 4,900	N/A	Meeting Space	Nashville, TN	THDA	Vendor	NonComp	No	No	n/a	
Contracts	The Royer Consultancy	4/30/2020-4/30/2020	\$ 500	WBE	Laura Royer - HBEI Webinar	Gainesville, FL	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	THO Software Solution	12/16/13 - 9/30/19	\$ 485,000	N/A	LIHEAP Software License, Hosting, Support and Maintenance	Minneapolis, MN	THDA	Vendor	NonComp	No	No	n/a	
Contracts	THO Software Solution	10/1/2019 - 9/30/2024	\$ 575,000	N/A	LIHEAP Software License, Hosting, Support and Maintenance	Minneapolis, MN	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	TNHC Housing Conference 2020 - Hotel Room Block	3/10/2020-3/12/2020	\$ 45,000	N/A	Hotel Room Block for 2020 TNHC	Nashville, TN	THDA	Vendor	Comp	No	Yes	n/a	
Contracts	TPAC Contract	8/1/2019-8/31/2019	\$ 1,500	N/A	Summer Speakers #4, August	Nashville, TN	THDA	Vendor				n/a	
Contracts	Velosio	11/1/2019 - 10/31/2024	\$ 150,000	N/A	Microsoft Dynamics	Dublin, OH	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	VenMinder	12/9/2019 - 12/30/2022	\$ 50,000	N/A	Vendor Mgmt Software for IT & IA	Elizabethtown, KY	THDA	Vendor	NonComp	No	Yes	n/a	
Contracts	Weiss & Cummins	10/15/16-10/15/2021	\$ 400,000	N/A	Foreclosure Services	Memphis, TN	THDA	Vendor	Comp	No	No	n/a	
Contracts	Williams & Williams	3/21/18-3/20/2023	\$ 400,000	N/A	Foreclosure Auction Services	Tulsa, OK	THDA	Vendor	Comp	Yes	No	n/a	
Contracts	Wolverine Real Estate Services	3/21/18-3/20/2023	\$ 300,000	N/A	Property Preservation Services	Tulsa, OK	THDA	Vendor	Comp	Yes	No	n/a	
ESG-19	Area Relief Ministries	7/1/19-6/30/20	\$ 134,500	N/A	Homeless Services	Jackson	Federal	Subrecipient	Comp	Yes	No	Yes	
LIHEAP 18	Blount Co Community Action	7/1/18 - 9/30/20	\$ 1,806,198	N/A	Assistance to LI HH paying energy bills	Maryville, TN	Federal	Subrecipient	NonComp	Yes	No	No	
LIHEAP 20	Bradley Cleveland Community Services	10/1/2019 - 9/30/2020	\$ 978,663	N/A	Assistance to LI HH paying energy bills	Cleveland, TN	Federal	Subrecipient	NonComp	Yes	No	No	

Program	Subrecipient/ Contractor Name	Begin/ End Dates	Amt of Contract	M/ WBE	Desc of Services	Address	Funding	Type of Contract	Competitive/ NonComp	Statement of Assurance	New Contract	Non-Discrimination in Services Survey	Notes
ESG-19	Bridges Domestic Violence Center	7/1/19-6/30/20	\$ 104,967	N/A	Homeless Services	Jackson, Tn	Federal	Subrecipient	Comp	Yes	No	Yes	
ESG-19	Buffalo Valley, Inc.	7/1/19-6/30/20	\$ 150,000	N/A	Homeless Services	Hohenwald, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
ESG-19	Carey Counseling Center, Inc.	7/1/19-6/30/20	\$ 82,500	N/A	Homeless Services	Paris, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
ESG-19	CEASE Domestic Violence and Sexual Assault Inc.	7/1/19-6/30/20	\$ 79,825	N/A	Homeless Services	Morristown, TN	Federal	Subrecipient	Comp	Yes	No	n/a	*Agency closed
ESG-19	Change Is Possible	7/1/19-6/30/20	\$ 104,000	N/A	Homeless Services	Erwin, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
NHTF 2018	Chattanooga Housng Authority	7/1/2019-6/30/2022	\$ 900,000	N	Rental Housing Development	Chattanooga, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
LIHEAP 20	Chattanooga HSD	10/1/2019 - 9/30/2020	\$ 2,795,088	N/A	Assistance to LI HH paying energy bills	Chattanooga, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
ESG-19	City of Clarksville	7/1/19-6/30/20	\$ 168,750	N/A	Homeless Services	Clarksville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
HOME 2019	City of Erin	7/1/2019-6/30/2022	\$ 375,000	N	Housing Rehabilitation	Erin, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
ESG-19	City of Johnson City	7/1/19-6/30/20	\$ 168,750	N/A	Homeless Services	Johnson City, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
ESG-19	City of Knoxville	7/1/19-6/30/20	\$ 161,250	N/A	Homeless Services	Knoxville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP Wx 18	City of Memphis	7/1/18 - 6/30/2021	\$ 1,166,747	N/A	EE Improve for Low Income HH	Memphis, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
WAP 19	City of Memphis	7/1/19 - 6/30/2021	\$ 808,508	N/A	Energy Efficiency Improve for LI HH	Memphis, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
HOME 2019	City of Milan	7/1/2019-6/30/2022	\$ 500,000	N	Housing Rehabilitation	Milan, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
ESG-19	City of Murfreesboro	7/1/19-6/30/20	\$ 168,750	N/A	Homeless Services	Murfreesboro, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
HOME 2019	City of Sneedville	7/1/2019-6/30/2022	\$ 250,000	N/A	Housing Rehabilitation	Sneedville, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
HOME 2019	City of Spencer	7/1/2019-6/30/2022	\$ 375,000	N/A	Housing Rehabilitation	Spencer, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	

Appendix O

Program	Subrecipient/ Contractor Name	Begin/ End Dates	Amt of Contract	M/ WBE	Desc of Services	Address	Funding	Type of Contract	Competitive/ NonComp	Statement of Assurance	New Contract	Non-Discrimination in Services Survey	Notes
HOME 2019	Claiborne County	7/1/2019-6/30/2022	\$ 500,000	N/A	Housing Rehabilitation	Tazwell, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
LIHEAP 20	Clarksville-Montgomery County CAA	10/1/2019 - 9/30/2020	\$ 148,985	N/A	Assistance to LI HH paying energy bills	Clarksville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP Wx 18	Clarksville-Montgomery County CAA	7/1/18 - 6/30/2021	\$ 150,710	N/A	EE Improve for Low Income HH	Clarksville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
WAP 19	Clarksville-Montgomery County CAA	7/1/2019-6/30/2021	\$ 153,379	N/A	Energy Efficiency Improve for LI HH	Clarksville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
HOME 2019	Clay County	7/1/2019-6/30/2022	\$ 500,000	N	Housing Rehabilitation	Celina, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
HOME 2019	Clinch Powell Resource and Development Council, inc.	12/9/22019-6/30/2022	\$ 97,394	N	Housing Development	Jefferson, City, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
HOME 2019	Clinch Powell Resource and Development Council, inc.	7/1/2019-6/30/2022	\$ 52,500	N	Operating Assistance	Jefferson, City, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
HOME 2019	Creative Compassion, Inc	7/1/2019-6/30/2022	\$ 30,944	N	Operating Assistance	Crossville, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
HOME 2019	Creative Compassion, Inc	11/5/2019-6/30/2022	\$ 123,611	N	Housing Development	Crossville, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
LIHEAP 18	Delta HRA	7/1/18 - 9/30/2020	\$ 2,328,006	N/A	Assistance to LI HH paying energy bills	Covington, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP Wx 18	Delta HRA	7/1/18 - 6/30/2021	\$ 235,243	N/A	EE Improve for Low Income HH	Covington, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
WAP 19	Delta HRA	7/1/19 - 6/30/2021	\$ 184,483	N/A	Energy Efficiency Improve for LI HH	Covington, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
ESG-19	Domestic Violence Program, Inc.	7/1/19-6/30/20	\$ 42,500	N/A	Homeless Services	Murfreesboro	Federal	Subrecipient	Comp	Yes	Yes	Yes	
LIHEAP 20	Douglas Cherokee Economic Authority	10/1/2019 - 9/30/2020	\$ 3,166,831	N/A	Assistance to LI HH paying energy bills	Morristown, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
HOME 2019	East Tennessee Housing Development Corp.	7/1/2019-6/30/2022	\$ 37,800	N	Operating Assistance	Knoxville, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
HOME 2019	East Tennessee Housing Development Corp.	2/4/2020-6/30/2022	\$ 112,611	N	Housing Development	Knoxville, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
HOME 2019	East Tennessee Housing Development Corp.	10/16/2019-6/30/2022	\$ 87,047	N	Housing Development	Knoxville, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	

Appendix O

Program	Subrecipient/ Contractor Name	Begin/ End Dates	Amt of Contract	M/ WBE	Desc of Services	Address	Funding	Type of Contract	Competitive/ NonComp	Statement of Assurance	New Contract	Non-Discrimination in Services Survey	Notes
HOME 2019	East Tennessee Housing Development Corp.	4/15/2020-6/30/2022	\$ 112,611	N	Housing Rehabilitation	Knoxville, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
LIHEAP 18-19	East TN HRA	10/1/2019 - 9/30/2020	\$ 2,438,991	N/A	Assistance to LI HH paying energy bills	Knoxville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP Wx 18	East TN HRA	7/1/18 - 6/30/2021	\$ 604,909	N/A	EE Improve for Low Income HH	Knoxville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
WAP 18	East TN HRA	7/1/2019 - 6/30/2021	\$ 527,428	N/A	Energy Efficiency Improve for LI HH	Knoxville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
ESG-19	Families in Crisis, Inc.	7/1/19-6/30/20	\$ 133,229	N/A	Homeless Services	McMinnville, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
ESG-19	Family Promise of Greater Johnson City, Inc.	7/1/19-6/30/20	\$ 86,700	N/A	Homeless Services	Johnson City, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
ESG-19	Family Promise of Greater Kingsport	7/1/19-6/30/20	\$ 57,500	N/A	Homeless Services	Kingsport, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
ESG-19	Fayette Cares Inc.	7/1/19-6/30/20	\$ 92,500	N/A	Homeless Services	Somerville, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
NHTF 2018	Franklin Housing Authority	7/1/2019-6/30/2022	\$ 843,000	N	Rental Housing Development	Franklin, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
ESG-19	Greater Kingsport Alliance for Development	7/1/19-6/30/20	\$ 108,000	N/A	Homeless Services	Kingsport, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
HOME 2019	Hamblen County	7/1/2019-6/30/2022	\$ 500,000	N	Housing Rehabilitation	Morristown, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
ESG-19	Helen Ross McNabb Center	7/1/19-6/30/20	\$ 84,200	N/A	Homeless Services	Maryville, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
NHTF 2018	Helen Ross McNabb Center	7/1/2019-6/30/2022	\$ 900,000	N	Rental Housing Development	Knoxville, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
HOME 2019	Henderson County	7/1/2019-6/30/2022	\$ 500,000	N	Housing Rehabilitation	Lexington, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
LIHEAP 20	Highland Rim Economic Corp	10/1/2019 - 9/30/2020	\$ 786,992	N/A	Assistance to LI HH paying energy bills	Erin, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
HOME 2019	Houston County	7/1/2019-6/30/2022	\$ 375,000	N	Housing Rehabilitation	Erin, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
ESG-19	Johnson County Safe Haven, Inc.	7/1/19-6/30/20	\$ 114,500	N/A	Homeless Services	Mountain City	Federal	Subrecipient	Comp	Yes	No	Yes	

Appendix O

Program	Subrecipient/ Contractor Name	Begin/ End Dates	Amt of Contract	M/ WBE	Desc of Services	Address	Funding	Type of Contract	Competitive/ NonComp	Statement of Assurance	New Contract	Non-Discrimination in Services Survey	Notes
LIHEAP 20	Knoxville-Knox Co Community Action	10/1/2019 - 9/30/2020	\$ 3,835,849	N/A	Assistance to LI HH paying energy bills	Knoxville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP Wx 18	Knoxville-Knox Co Community Action	7/1/18 - 6/30/2021	\$ 605,328	N/A	EE Improve for Low Income HH	Knoxville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
WAP 19	Knoxville-Knox Co Community Action	7/1/19 - 6/30/20	\$ 504,650	N/A	Energy Efficiency Improve for LI HH	Knoxville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP Wx 18	MDHA	7/1/18 - 6/30/2021	\$ 671,194	N/A	EE Improve for Low Income HH	Nashville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
WAP 19	MDHA	7/1/19- 6/30/2021	\$ 532,054	N/A	Energy Efficiency Improve for LI HH	Nashville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
HOME 2019	Meigs County	7/1/2019- 6/30/2022	\$ 500,000	N	Housing Rehabilitation	Decatur, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
LIHEAP 18-19	Metropolitan Action Commission	7/1/18 - 9/30/2020	\$ 12,483,186	N/A	Assistance to LI HH paying energy bills	Nashville, TN	Federal	Subrecipient	NonComp	Yes	No	No	
NHTF 2018	Metropolotan Housing Development Agency	7/1/2019- 6/30/2022	\$ 474,433	N	Rental Housing Development	Nashville, TN	Federal	Subrecipient	Comp	Yes	Yes	No	
NHTF 2019	Metropolotan Housing Development Agency	2/1/2019- 1/31/2023	\$ 483,954	N	Rental Housing Development	Nashville, TN	Federal	Subrecipient	Comp	Yes	No	No	
LIHEAP 18-19	Mid-Cumberland Community Action	7/1/18 - 9/30/2020	\$ 9,887,535	N/A	Assistance to LI HH paying energy bills	Lebanon, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP Wx 18	Mid-Cumberland Community Action	7/1/18 - 6/30/21	\$ 531,632	N/A	EE Improve for Low Income HH	Lebanon, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
WAP 19	Mid-Cumberland Community Action	7/1/18 - 6/30/2021	\$ 366,568	N/A	Energy Efficiency Improve for LI HH	Lebanon, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP 20	Mid-East Community Action Agency	10/1/2019 - 9/30/2020	\$ 844,447	N/A	Assistance to LI HH paying energy bills	Kingston, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
ESG-19	Ministerial Association Temporary Shelter (MATS)	7/1/19- 6/30/20	\$ 117,500	N/A	Homeless Services	Morristown, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
NHTF 2019	Murfreesboro Housing Authority	2/1/2019- 1/31/2023	\$ 900,000	N	Rental Housing Development	Murfreesboro, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
HOME 2019	Neighborhood Housing, Inc	7/1/2019- 6/30/2022	\$ 33,118	N	Operating Assistance	Knoxville, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
LIHEAP 20	Northwest TN Economic Dev Council	10/1/2019 - 9/30/2020	\$ 2,731,843	N/A	Assistance to LI HH paying energy bills	Dresden, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	

Program	Subrecipient/ Contractor Name	Begin/ End Dates	Amt of Contract	M/ WBE	Desc of Services	Address	Funding	Type of Contract	Competitive/ NonComp	Statement of Assurance	New Contract	Non-Discrimination in Services Survey	Notes
ESG-19	Pinnacle Resource Center	7/1/19-6/30/20	\$ 85,500	N/A	Homeless Services	Huntsville, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
LIHEAP Wx 18	SE TN HRA	7/1/18 - 6/30/2021	\$ 621,223	N/A	EE Improve for Low Income HH	Dunlap, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
WAP 19	SE TN HRA	7/1/19 - 6/30/2021	\$ 556,520	N/A	Energy Efficiency Improve for LI HH	Dunlap, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP 20	Southeast TN HRA	10/1/2019 - 9/30/2020	\$ 2,070,451	N/A	Assistance to LI HH paying energy bills	Dunlap, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP 20	Shelby Co Community Services	10/1/2019 - 9/30/2020	\$ 10,746,168	N/A	Assistance to LI HH paying energy bills	Memphis, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP 20	South Central HRA	10/1/2019 - 9/30/2020	\$ 3,817,006	N/A	Assistance to LI HH paying energy bills	Fayetteville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP Wx 18	South Central HRA	7/1/18 - 6/30/21	\$ 412,369	N/A	EE Improve for Low Income HH	Fayetteville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
WAP 19	South Central HRA	7/1/19 - 6/30/21	\$ 305,322	N/A	Energy Efficiency Improve for LI HH	Fayetteville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP 20	Southwest HRA	10/1/2019 - 9/30/2020	\$ 2,682,221	N/A	Assistance to LI HH paying energy bills	Henderson, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP Wx 18	Southwest HRA	7/1/18 - 6/30/21	\$ 466,931	N/A	EE Improve for Low Income HH	Henderson, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
WAP 19	Southwest HRA	7/1/19 - 6/30/21	\$ 495,510	N/A	Energy Efficiency Improve for LI HH	Henderson, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
ESG-19	Tennessee Homeless Solutions	7/1/19-6/30/20	\$ 125,500	N/A	Homeless Services	Jackson, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
ESG-19	Tennessee Valley Coalition to End Homelessness	7/1/19-6/30/20	\$ 10,750	N/A	Homeless Services	Jacksboro, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
NHTF 2019	The Crossroads Campus	2/1/2019-1/31/2023	\$ 562,005	N	Rental Housing Development	Nashville, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
ESG-19	The Crossville Housing Development Corporation	7/1/19-6/30/20	\$ 95,900	N/A	Homeless Services	Crossville, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
ESG-19	The Journey Home, Inc.	7/1/19-6/30/20	\$ 125,000	N/A	Homeless Services	Murfreesboro, TN	Federal	Subrecipient	Comp	Yes	No	Yes	

Program	Subrecipient/ Contractor Name	Begin/ End Dates	Amt of Contract	M/ WBE	Desc of Services	Address	Funding	Type of Contract	Competitive/ NonComp	Statement of Assurance	New Contract	Non-Discrimi nation in Services Survey	Notes
ESG-19	The Salvation Army, a Georgia Corporation, for Knoxville, TN	7/1/19-6/30/20	\$ 83,000	N/A	Homeless Services	Johnson City, TN	Federal	Subrecipient	Comp	Yes	No	Yes	
HOME 2019	Town of Erwin	7/1/2019-6/30/2022	\$ 250,000	N	Housing Rehabilitation	Erwin, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
HOME 2019	Town of Gates	7/1/2019-6/30/2022	\$ 500,000	N	Housing Rehabilitation	Gates, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
HOME 2019	Town of Maury City	7/1/2019-6/30/2022	\$ 500,000	N	Housing Rehabilitation	Maury City, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
HOME 2019	Town of Mount Carmel	7/1/2019-6/30/2022	\$ 250,000	N	Housing Rehabilitation	Mount Carmel, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
HOME 2019	Town of Samburg	7/1/2019-6/30/2022	\$ 500,000	N	Housing Rehabilitation	Samburg, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
ESG-19	Trinity Out-Reach Center of Hope	7/1/19-6/30/20	\$ 87,500	N/A	Homeless Services	Oak Ridge	Federal	Subrecipient	Comp	Yes	No	Yes	
HOME 2019	Union County	7/1/2019-6/30/2022	\$ 500,000	N	Housing Rehabilitation	Maynardville, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
LIHEAP 20	Upper Cumberland HRA	10/1/2019 - 9/30/2020	\$ 3,687,721	N/A	Assistance to LI HH paying energy bills	Cookeville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP Wx 18	Upper Cumberland HRA	7/1/18 - 6/30/21	\$ 385,228	N/A	EE Improve for Low Income HH	Cookeville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
WAP 19	Upper Cumberland HRA	7/1/19 - 6/30/21	\$ 313,769	N/A	Energy Efficiency Improve for LI HH	Cookeville, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP 20	Upper East TN HDA	10/1/2019 - 9/30/2020	\$ 5,142,367	N/A	Assistance to LI HH paying energy bills	Kingsport, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
LIHEAP Wx 18	Upper East TN HDA	7/1/18 - 6/30/21	\$ 545,138	N/A	EE Improve for Low Income HH	Kingsport, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
WAP 19	Upper East TN HDA	7/1/19 - 6/30/21	\$ 625,026	N/A	Energy Efficiency Improve for LI HH	Kingsport, TN	Federal	Subrecipient	NonComp	Yes	No	Yes	
HOME 2019	Van Buren County	7/1/2019-6/30/2022	\$ 375,000	N	Housing Rehabilitation	Spencer, TN	Federal	Subrecipient	Comp	Yes	Yes	Yes	
ESG-19	Wo/Men's Resource and Rape Assistance Program	7/1/19-6/30/20	\$ 157,500	N/A	Homeless Services	Jackson, TN	Federal	Subrecipient	Comp	Yes	No	Yes	