



Tennessee Housing Development Agency Sub-recipient Non-Discrimination in Services/Title VI Self-Survey

Background & Instructions

To ensure compliance with Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, the Fair Housing Act and other civil rights statutes and implementing regulations, all THDA contracts with sub-recipients include a non-discrimination assurance that requires the grantee not to exclude persons from participation in, deny benefits to, or otherwise subject any person to discrimination on the grounds of race, color, religion, sex, national origin, disability, age, or any other classification protected by Federal, State or statutory law.

The purpose of this survey is to gather information on non-discrimination activities; allow THDA to ensure compliance with required state and Federal reporting and inform planning for training and technical assistance. All sub-recipients with an active THDA grant must complete a Self-Survey **each year the contract is in effect** and submit the form **no later than July 31**. THDA's Self Survey is required even when a sub-recipient completes a similar form with another State agency.

The form is a fillable PDF and may be completed using an electronic signature and emailed to civilrights@thda.org or printed, signed and mailed to, Civil Rights Compliance, THDA, 502 Deaderick St, Nashville, TN 37243. Please direct questions or concerns about this Self Survey, THDA's online training or other civil rights issues to civilrights@thda.org.

Please note: An employee of a contracted grant administrator may complete the Self Survey on behalf of a sub-recipient, but the responsible official for the sub-recipient or entity who signs the contract with THDA must review and sign the self-survey before submission.

Sub-recipient/Grantee Information

Grantee/Sub-recipient Name

Responsible Official Name & Title

Address (inc. city, state, zip)

Phone No.

Title VI Coordinator Name (*required*)

Title VI Coordinator Email (*required*)

Name & Title of Person Completing Survey

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

Grant Information

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

Grant Program (i.e., HOME, LIHEAP, ESG, etc.) **Total Award (\$)** **Award Year**

Are any of the above grants sub-contracted or administered by a different entity? Yes No
 If Yes, list the name of the grant administrator:

Demographics & Program Outreach

- Describe the organization's service area (city or county(ies) served by the organization):
- Provide the race and ethnicity breakdown for the service area. If you serve more than one county, please calculate and provide combined numbers/percentages for all counties served (Census Quick Fact report available here: <https://www.census.gov/quickfacts/fact/table/US/PST045224>).

# or %	Black	White	Asian	Am. Indian/ Alaskan Na.	Hawaiian/ Pacific Is.	2 or more races	Hispanic
#							
%							

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

Program	Black	White	Asian	Am. Indian/ Alaskan Na.	Hawaiian/ Pacific Is.	2 or more races	Hispanic

- When comparing beneficiary race/ethnicity to that of the overall population in the service area, are there disproportionately underserved groups? Yes No N/A (no beneficiaries served in reporting period)
- Is more than five percent of the service area population limited English proficient (may access S1602 US Census report for this purpose)? Yes No

6. HUD Housing Grantees only

Check here and skip to the next section if your organization does not manage HUD funding or where HUD funding is limited to single-family development with initial occupancy completed more than six months prior.

If you answered Yes to Q4 and/or Q5, what changes to your marketing or outreach activities are planned in the next fiscal year to notify underserved populations or those least likely to apply of HUD funded program availability?

Non-discrimination Training Activities

1. Do new employees receive non-discrimination training before providing services or engaging in decisions relating to THDA grant funded activities? Yes No

2. Which of the following non-discrimination laws or requirements are covered in new employee training?

Title VI Section 504 Fair Housing Other:

3. Is non-discrimination training provided to all employees annually? Yes No

4. Which of the following non-discrimination laws or requirements are covered in annual employee training?

Title VI Section 504 Fair Housing Other:

5. Number of staff members, who engage in decisions relating to THDA grant(s) activities, completing non-discrimination training during past 12 months?

6. If the sub-recipient has a grant administrator who engages in decisions relating to THDA grant(s) activities, has the Title VI or other responsible party for the administrator completed non-discrimination training during past twelve months? Yes No N/a

Non Discrimination Policy, Procedures & Compliance

1. Does the sub-recipient have a written policy statement assuring non-discrimination in all activities based on race, color, sex, national origin, disability, age, or any other classification protected by Federal, State, or statutory law? Yes No

If NO, please explain why:

2. Does your organization have a Section 504 or reasonable accommodation policy and procedure? Yes No

3. Does your organization have written policies and procedures for the language services offered to LEP persons and how the services are delivered? Yes No (please explain):

4. Does your organization provide free interpretation services (oral) to LEP persons?
Yes No
5. Does your organization make any of the following available in languages other than English?
Vital program documents Program brochures Posters or Advertisements
N/A (no documents made available in languages other than English)
6. Please provide the number of language encounters or requests for language assistance in the reporting period. **Include the number of cases where the organization provided a qualified interpreter and where an applicant/beneficiary provided their own interpreter.*

# of Requests/Encounters	Language/Language Group (e.g., Spanish)

7. If a grant administrator or sub-contractor manages THDA funded program activities on behalf of the sub-recipient, please describe briefly how the sub-recipient monitors the administrator or ensures compliance with non-discrimination obligations. *Note: Entities who do not have an administrator may skip to the next section.*

Notices

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

6. Does the sub-recipient include a notice of non-discrimination and a notice that contracts or agreements are subject to Title VI of the Civil Rights Act of 1964 and other nondiscrimination laws in all solicitations for bids of work or materials? Yes No N/A

Discrimination Complaints

1. How does the sub-recipient notify applicants and beneficiaries of their right to file a complaint alleging discrimination (i.e., written notice given to all beneficiaries, HUD poster, etc.)?

2. Number of discrimination complaints (Title VI, Fair Housing, Section 504) filed that name the sub-recipient entity during the survey period:

**If at least one complaint was received during survey period, attach a log to the survey with the complaint date, complainant name, nature or basis of the complaint, and a summary of the determination.*

3. Did the sub-recipient entity notify THDA of all complaints of discrimination at the time of receipt by the agency (within ten business days)? Yes No N/A (*no complaints in reporting period*)

4. Number of complaint(s) filed with state or federal jurisdictional agency (HUD, HHS, DOE) in the past year alleging discrimination by the sub-recipient entity:

5. Number of lawsuit(s)* filed alleging discrimination by the sub-recipient entity in the past three years:

**Attach an explanation of the nature or status of any lawsuit(s); date filed and disposition.*

Governing Boards

1. Does your organization have a Board of Directors? Yes No, If no, skip section.

2. What is the term length for Board of Directors membership?

3. How are members of the Board of Directors selected?

4. Is the Board composition representative of the demographics of the service area? Yes No

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

Signature*

Print Name

Sub-recipient/Grantee Name

Date (mm/dd/yy)

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