

If you are a person with a disability and need an accessible version of this document, please contact THDA's 504 Coordinator at [RARequest@thda.org](mailto:RARequest@thda.org).



FY 2024–2025

## TITLE VI COMPLIANCE REPORT AND IMPLEMENTATION PLAN

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

[WWW.THDA.ORG](http://WWW.THDA.ORG)

# Table of Contents

I.	OVERVIEW OF AGENCY PROGRAMS/ACTIVITIES	4
II.	RESPONSIBLE OFFICIALS & SIGNATURES	12
III.	DEFINITIONS	13
IV.	NON-DISCRIMINATION POLICY	18
V.	ORGANIZATION OF THE CIVIL RIGHTS OFFICE	19
VI.	DISCRIMINATORY PRACTICES	21
VII.	FEDERAL PROGRAMS OR ACTIVITIES	22
VIII.	DATA COLLECTION & ANALYSIS	26
IX.	LIMITED ENGLISH PROFICIENCY	31
X.	COMPLAINT PROCEDURES	35
XII.	TITLE VI/NON-DISCRIMINATION TRAINING PLAN	38
XII.	SUB-RECIPIENT MONITORING	40
XIII.	PUBLIC NOTICE & OUTREACH	47
XV.	COMPLIANCE REPORTING	56
XVI.	EVALUATION PROCEDURES	60

APPENDICES A-Q

# I. Overview of Agency Programs & Activities

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 at low- to moderate-income homebuyers and extremely low- to low-income renters.<sup>1</sup>

THDA is the primary funding recipient for various federal housing and related programs (utility and weatherization assistance) and administers agency or state funded housing programs. Each of the programs is described below by activity. **Appendix A** contains an organizational chart of all divisions and positions within the agency, and the reporting structure.

## A. Homeownership Programs

THDA provides loans, manages housing grants and supports housing education across the state to promote successful and stable homeownership for low-to-moderate income Tennesseans. THDA’s Chief of Single Family Programs manages the various divisions that administer THDA’s homeownership, housing education and loan servicing programs described below.

THDA issues Mortgage Revenue Bonds (MRBs) to support financing opportunities for qualified first-time homebuyers, repeat buyers, active military and veterans and first responders through its **Great Choice Loan Programs**, which are administered by THDA’s Single Family Loan Operations (SFLO) division. THDA is authorized to issue bonds and notes to provide funds for mortgage loans at below market interest rates through enabling state legislation. Great Choice loans have competitive interest rates; many are

---

<sup>1</sup> The Department of Housing and Urban Development (HUD) defines “extremely low income” as less than 30 percent of family area median income (AMI). Low income may not exceed 80 percent of AMI.

insured by FHA or USDA-RD and require a lower than market downpayment. Income and purchase price limits apply to the Great Choice program. Active and retired members of the military receive a half-percent reduction on the interest rate through the **Homeownership for the Brave** program. THDA also offers **downpayment assistance (DPA)** where borrowers may receive up to \$6,000 dollars (forgivable second mortgage loan) to help fund a downpayment. THDA is not a lender and does not work directly with borrowers. THDA partners 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. THDA’s **Volunteer Mortgage Loan Servicing (VMLS)** division services all THDA loans.

THDA provides capacity for non-profit organizations to provide housing counseling and education through THDA’s **Housing Counseling Programs (HCP)**. Great Choice Plus and Homeownership for the Brave homebuyers are required to participate in a THDA-approved homebuyer education course before loan approval. THDA’s Board of Directors authorizes proceeds from THDA’s MRB program to be utilized for HCP programs, and that funding, along with a U.S. Department of Housing and Urban Development (HUD) Housing Counseling Program grant allow THDA to fund and support a statewide network of non-profit housing counseling affiliates to provide homeownership counseling.

THDA began utilization of mortgage loan proceeds for a **Tennessee Housing Trust Fund (THTF)** in 2006. Through the THTF, THDA allocates funding for various housing programs described herein that benefit low- and very low-income elderly and special needs Tennesseans. THDA’s Community Housing division administers the THTF through grants to cities, counties, development districts, and public housing authorities (PHAs) for approved housing activities. The THTF maintains a targeted annual allocation for the **New Start Loan Program**, which promotes the construction of new single-family homes for low and very low-income Tennesseans and is delivered statewide through non-profit organizations, primarily Habitat for Humanity.

THDA utilizes Federal funding from the **HOME Investment Partnership (HOME)** program, a HUD formula grant program, for the production, preservation and rehabilitation of single-family housing for low-income households. The HOME program is administered by THDA's Community Housing division and governed by Title 24 Code of Federal Regulations, Part 92, as amended. THDA awards grants from its HOME program through a competitive application process to cities, counties and non-profit organizations outside of local participating jurisdictions, or those local governments in Tennessee that receive formula grant funding directly from HUD<sup>2</sup>. THDA provides separate HOME funding opportunities for nonprofit housing developers designated by the State as a Community Housing Development Organization (CHDO).

## B. Rental Housing Development & Preservation

Through various programs, all of which fall under the direction of the Chief of Programs, THDA works with housing developers to encourage the construction and rehabilitation of rental housing affordable to low-income individuals and families.

THDA is the State administrator for the **Low Income Housing Tax Credit (LIHTC)** program. The LIHTC program was created by the Tax Reform Act of 1986 under Section 42 of the Internal Revenue Code of 1986, as amended ("Section 42"), to encourage the construction and rehabilitation of rental housing for low-income individuals and families. THDA competitively awards tax credits to project sponsors/developers who raise capital by selling the credits to investors, and in turn use the revenue to build multifamily rental housing affordable to low-income households.

---

<sup>2</sup> 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).

THDA is authorized to allocate **Multi-family Tax-Exempt Bond Authority (MTBA)** to local issuers to finance multifamily housing units in Tennessee under Section 142(d) of the Internal Revenue Code of 1986. THDA allocates private activity bond authority to local issuing entities to provide financing for the rehabilitation or development of eligible affordable rental housing.

The **National Housing Trust Fund (NHTF)** is a HUD funded formula grant program designed to increase and preserve the supply of rental housing and to increase homeownership for extremely low-income and very low-income families, including homeless families. The program is governed by Title 24 Code of Federal Regulations, Parts 91 and 93; Interim Rule. THDA's Multifamily Division awards NHTF through a competitive application process concurrent with and as a part of an application for competitive LIHTC. NHTF grants are targeted towards proposals for permanent supportive housing and proposals for multifamily rental housing in rural counties. Eligible recipients are local public housing authorities and non-profit organizations.

The LIHTC, MTBA and NHTF programs are administered by THDA's Multifamily Division.

The **Community Investment Tax Credit (CITC)** program is administered by THDA's Community Housing division 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.

The **THTF** provides funding for several housing or related programs with administration by THDA's Community Housing division. The **Competitive Grants** program funds the development and/or preservation of affordable rental housing for the elderly and those with special needs, including individuals with mental, physical, or developmental disabilities, those recovering from substance addiction, victims of domestic violence,

veterans with multiple needs, youth aging out of foster care and ex-offenders re-entering society. Funding is awarded to local communities, non-profits, PHAs and development districts through a competitive process.

### C. Rental Assistance

In addition to programs that fund the development of affordable rental housing, THDA administers programs or activities that help very low-income households afford rent payments in both privately owned rental housing and housing complexes with a HUD project based rental assistance contract. The Chief of Programs oversees the divisions that administer rental assistance programs and ensure compliance with state and federal requirements.

Through its Rental Assistance division, THDA directly administers the HUD-funded **Housing Choice Voucher (HCV) Program**, which provides rental and utility assistance payments for very low-income households across the state in compliance with 24 CFR Part 982 and other HUD guidance. In the HCV program, participants pay 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 administers targeted allocations of vouchers, **Section 811 Non-Elderly Disabled (NED)** and **Mainstream**, for individuals with a disability. Participants of the HCV program may also elect to participate in the **Family Self Sufficiency Program**, which is administered by the Rental Assistance division and connects individuals to resources to help them become self-sufficient of government assistance programs, such as education and housing or financial counseling.

THDA's Program Compliance division oversees compliance monitoring for **HUD low-rent Section 8 apartments** and makes qualifying housing and utility assistance payments to the properties through a performance based Annual Contributions

Contract (ACC) with HUD. THDA sub-contracts the responsibilities under the HUD ACC to CGI, Inc., an IT and business consulting firm.

## D. Homelessness Prevention & Solutions

THDA's Community Services division administers funding aimed at assisting unhoused individuals and families and those at risk of homelessness as the state administrator for **the Emergency Solutions Grant (ESG)** program in compliance with 24 CFR Part 576 and other HUD guidance. The ESG program is a HUD formula grant program designed to identify sheltered and unsheltered people, as well as those at risk of homelessness, and provide the services necessary to help those people secure permanent housing. THDA competitively awards ESG funds across the state to local governments and non-profit organizations outside of entitlement communities that receive a direct allocation of funding from HUD<sup>3</sup>. THDA also administers supplemental allocations of ESG, when made available by HUD, to prevent, prepare for, and respond to housing emergencies.

## E. Rehabilitation, Repair & Weatherization Assistance

THDA's Community Housing and Services divisions administer several programs that help very- and low-income households with home rehabilitation, repair and weatherization. THDA grants funds to sub-recipient agencies, typically local community agencies or other non-profit agencies, who serve local or regional areas and work directly with eligible households.

THDA utilizes HUD **HOME** program funding to sub-award grant funding to cities, counties and non-profit organizations, who use the funding at the local level to preserve and rehabilitate single- family housing for low-income households. THDA's

---

<sup>3</sup> Entitlement areas that receive a direct allocation of regular ESG funds are Chattanooga, Memphis, and Nashville-Davidson County.

HOME program operates in areas outside of local participating jurisdictions, which receive direct HUD funding<sup>4</sup>.

THDA's **Weatherization Assistance Program** is funded through the Department of Energy (DOE) and administered in compliance with 10 CFR Part 400, as amended and other DOE guidance. The program assists low-income households with reducing fuel costs by improving the thermal efficiency of housing units through activities such as weather stripping, caulking, and adding of insulation. Households with young children, elderly or disabled members are prioritized. With federal approval, THDA allocates ten (10) percent of the state's **Low Income Home Energy Assistance (LIHEAP) Program** allocation to **Weatherization (LIHEAP Wx)** activities that increase the energy efficiency, health, and safety of eligible low-income individuals' dwellings. THDA operates the LIHEAP Wx program in concurrence with its DOE Weatherization Assistance Program. THDA grants LIHEAP and LIHEAP WX funding to sub-recipients, typically local community or government entities, such as Community Action Agencies, Economic Development Councils or Human Resource Agencies, who directly administer the program in their local or regional service areas.

THDA's **THTF** provides funding for several home repair or rebuilding programs with THDA Board approval. 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

---

<sup>4</sup> 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).

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.

## F. Home Utility Assistance

THDA's Community Services division administers the **Low Income Home Energy Assistance (LIHEAP)** Program funded through the Department of Health and Human Services (DHHS) in compliance with 45 CFR Part 96. The LIHEAP program provides one time and crisis assistance with home energy bills (for renters and homeowners). THDA grants LIHEAP and LIHEAP WX funding to sub-recipients, typically local community or government entities who directly administer the program in their local or regional service areas.

## G. Temporary Programs

Following the Covid-19 crisis, THDA received a share of funding through the state appropriation of the Consolidated Appropriations Act (2021) and direct appropriations from the American Rescue Plan Act (ARP) of 2021. THDA continued to administer temporary housing programs, described below, during FY2024-2025, funded through these appropriations.

The **Emergency Rental Assistance/Eviction Prevention Program** (U.S. Treasury) assists eligible renter households in paying rent, utilities, or other home energy costs due to loss of wages/income because of the COVID-19 pandemic in areas of the state that did not receive direct funding. Beginning in FYE 2024 and continuing into FYE 2025, THDA allocated remaining ERA-2 funding to qualified non-profit agencies, cities or counties to manage eviction prevention programs in their service area, with oversight by THDA's Community Services division. The ERA/EPP program was winding down by the end of the fiscal year with final expenditures due from grantees by September 30, 2025.

THDA received an allocation of the State's ARP to administer the Housing Assistance Fund (HAF) program with oversight by U.S. Treasury. Funds remaining during FYE2024

were allocated to reduction or extinguishment of partial claims through FHA, VA or USDA loans included in a COVID loss mitigation resolution through the applicant's service provider. The HAF program partial claim program closed to new applications on April 30, 2025, with all claims processed by June 30, 2025.

THDA received a direct allocation of ARP funds through the HUD appropriation to administer the HOME-ARP program. In FYE2024 (continuing into FYE2025), THDA allocated remaining HOME-ARP funding to eligible subrecipient agencies to assist qualifying individuals and families who are: i) homeless; ii) at risk of homelessness; iii) fleeing, or attempting to flee, domestic violence, human trafficking; or iv) other vulnerable individuals to provide the services necessary to help those persons regain stability.

THDA grants funds non-competitively from a State allocation (pass through) of U.S. Department of Treasury funds to FAHE to complete single and multifamily affordable housing development and rehabilitation.

## H. Other Housing Related Initiatives

The THTF also supports special initiatives designed to ensure long-term stability of local affordable housing providers through capacity building or leveraging of funds (as approved by THDA's Board of Directors). One such initiative is the **Capacity Building** grant program which supports the development and strengthening of the operations, processes and resources that nonprofit organizations need to effectively ensure affordable housing in Tennessee.

## II. RESPONSIBLE OFFICIALS

THDA's Executive Team is comprised of the Executive Director (Department Head), Ralph Perrey, and five Executive Officers. THDA's Executive Director, Assistant Chief Legal Counsel, and Civil Rights Compliance Advisor are the responsible officials for the Title VI Compliance and Implementation Plan.

Signatures:



**Laura Swanson**

**Advisor, Civil Rights Compliance (Title VI Coordinator)**

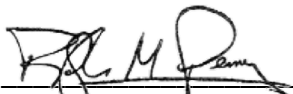
Tennessee Housing Development Agency  
502 Deaderick St., Andrew Jackson Bldg.  
Nashville, TN 37243



**Charity Williams**

**Assistant Chief Legal Counsel**

Tennessee Housing Development Agency  
502 Deaderick St., Andrew Jackson Bldg.  
Nashville, TN 37243



**Ralph M. Perrey**

**Executive Director**

Tennessee Housing Development Agency  
502 Deaderick St., Andrew Jackson Bldg.  
Nashville, TN 37243

### III. DEFINITIONS

**Table 1** defines common terms with acronyms used in this report and in programs administered by THDA.

**Table 1- Acronyms and Definitions**

<b>ACS</b>	<b>American Community Survey</b> - 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.
<b>AMI</b>	<b>Area Median Income</b> - 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.
<b>ARP</b>	The <b>American Rescue Plan Act of 2021</b> - provides additional funding for rental assistance, homelessness assistance, housing counseling, and housing assistance related to financial impacts of the COVID-19 pandemic.
<b>CAA/CAC</b>	<b>Community Action Agency or Commission</b> – A nonprofit organizations created through the Economic Opportunity Act of 1964. Tennessee’s 20 Community Action Agencies cover all 95 counties and work to reduce or eliminate poverty in geographically designated areas.
<b>CAPER</b>	<b>Consolidated Annual Performance Evaluation Report</b> - An evaluation and performance report required by the Department of Housing and Urban Development (HUD) and completed by recipients of formula grant funding.
<b>CDBG</b>	<b>Community Development Block Grant</b> – A HUD formula grant program that provides communities with resources to address a wide range of unique community development needs.

<b>CHAS</b>	<b>Comprehensive Housing Affordability Strategy</b> – 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.
<b>CHDO</b>	<b>Community Housing Development Organization</b> – A private nonprofit, community- based service organization whose primary purpose is to provide and develop decent, affordable housing for the community it serves.
<b>CoC</b>	<b>Continuum of Care</b> - A regional or local planning body that coordinates housing and services funding for homeless families and individuals.
<b>COVID-19</b>	<b>Covid-19</b> – A disease caused by a new strain of coronavirus disease that emerged in 2019 and resulted in an ongoing global pandemic.
<b>DOE</b>	<b>US Department of Energy</b> - 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.
<b>ESG</b>	<b>Emergency Solutions Grant-</b> 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.
<b>FSS</b>	The <b>Family Self-Sufficiency Program</b> - 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.
<b>Great Choice</b>	The <b>Great Choice Mortgage Loan Program</b> offers 30-year, fixed rate mortgages to qualified first-time, repeat and military veteran homebuyers in Tennessee funded through the sale of Mortgage Revenue Bonds (MRB).

<b>HAF</b>	<b>Housing Assistance Fund Program-</b> A U.S. Treasury program established under Section 3206 of The American Rescue Plan Act of 2021 to prevent mortgage delinquencies and defaults, foreclosures, loss of utilities or home energy services, and displacement of homeowners experiencing financial hardship after January 21, 2020 as a result of Covid-19 impacts.
<b>HAP</b>	<b>Housing Assistance Payment</b> – A HUD funded payment to assist with rent or utility payments and paid on the behalf of eligible households participating in the HUD- funded Housing Choice Voucher Program (HCV) or through a project-based contract through the Section 8 Project Based Rental Assistance program (PBCA).
<b>HBEI/HBC</b>	<b>Homebuyer Education Initiative (Homebuyer Counseling)</b> – THDA’s initiative to create better-prepared first- time homebuyers primarily funded through proceeds from THDA’s mortgage program and partially funded through a HUD Homebuyer Counseling grant.
<b>HCV</b>	<b>Housing Choice Voucher Program</b> – 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 rental market.
<b>HFA</b>	<b>Housing Finance Agency</b> – A state-chartered authority established to help meet the affordable housing needs of the states’ residents. Through partnerships with the private and public sector, HFAs provide housing for people with low or moderate income.
<b>HHS</b>	<b>US Department of Health &amp; Human Services</b> – 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.
<b>HRA</b>	<b>Human Resource Agency</b> – 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.

<b>THTF</b>	<b>Tennessee’s Housing Trust Fund Program (HTF)</b> is financed by revenue from the mortgage loan proceeds and funds housing-related activities for persons of low and very low income through a number of initiatives.
<b>HUD</b>	<b>US Department of Housing and Urban Development</b> – A cabinet department in the Executive branch of the United States federal government. HUD funds programs that that develop and support affordable housing opportunities, including public housing programs and homeownership programs. HUD also seeks to protect consumers through education, Fair Housing Laws, and housing rehabilitation initiatives.
<b>IRS</b>	<b>Internal Revenue Service</b> – The U.S. government agency responsible for tax collection and tax law enforcement, including allocation and oversight of the LIHC program.
<b>LIHC</b>	The <b>Low Income Housing Tax Credit Program</b> 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.
<b>LIHEAP</b>	<b>Low Income Home Energy Assistance Program</b> provides one time and crisis assistance with home energy bills (for low-income renters and homeowners) through federal funding from the DHHS. A portion of the LIHEAP grant is set aside for weatherization purposes (LIHEAP Wx).
<b>MRB</b>	THDA sells tax-exempt <b>mortgage revenue bonds</b> 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.

<b>MFTBA</b>	THDA authorizes the allocation of <b>Multifamily Tax-Exempt Bond Authority</b> 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.
<b>NHTF</b>	The <b>National Housing Trust Fund</b> is a HUD formula grant program that provides funding for the rehabilitation and new construction of rental housing for extremely low income households.
<b>PHA</b>	<b>Public Housing Agency</b> – 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.
<b>Treasury</b>	<b>U.S. Treasury Department</b> - A cabinet department in the Executive branch of the United States federal government. The agency responsible for promoting economic prosperity and ensuring the financial security of the United States.
<b>WAP</b>	The <b>Weatherization Assistance Program (WAP)</b> reduces energy costs for low-income households by increasing the energy efficiency of their homes, while ensuring their health and safety.

## IV. NON-DISCRIMINATION POLICY

- A. THDA has adopted the “Tennessee Housing Development Agency (THDA) Non-Discrimination in Provision of Services” policy and the “Equal Employment Opportunity and Affirmative Action” policy, both of which are included as **Appendix B** of this document. The Non-discrimination in the Provision of Services policy governs the activities of all program divisions, sub-recipients and contractors when providing services to the public and incorporates references for relevant federal or state statutes. The policy is disseminated to all employees through THDA’s employee intranet and referenced during new employee and annual training.
  
- B. THDA, along with its sub-recipients and contractors, shall make available Title VI compliance reports to Department of Human Resources upon request.

## V. ORGANIZATION OF THE CIVIL RIGHTS OFFICE

A. THDA does not have a dedicated Civil Rights office. Civil Rights oversight and compliance is situated in THDA's Legal Division. The Civil Rights Compliance Advisor is responsible for providing agency-wide oversight to ensure compliance with THDA and Federal implementing regulations for non-discrimination. The Advisor serves as THDA's Title VI Coordinator.

B. The Legal division positions and reporting structure are displayed within THDA's organization chart found in **Appendix A**.

C. The Civil Rights Compliance Advisor/Title VI Coordinator's duties include the following:

- Review THDA program policies and procedures for fair housing and civil rights compliance and work with program divisions for implementation of changes in processes and policies where needed to ensure compliance with state and federal laws and enabling regulations.
- Prepare and/or coordinate and track non-discrimination training for THDA staff on an annual basis and new employees within their probationary period.
- Prepare and/or coordinate non-discrimination training for THDA sub-recipients, contractors and partners and track annual completion.
- Oversight and compliance reviews of THDA's annual sub-recipient non-discrimination self-survey and assessment.
- Coordinate discrimination complaint intake, internal investigation (where appropriate), tracking and communication with jurisdictional agencies.
- Coordinate language access activities for agency, including oversight of contract activities for oral interpretation and written translation, and the research and development of a Language Access Plan.

- Coordinate compliance with the Americans with Disabilities Act requirements.
- Gather internal and external information, analyze data and information, compile and submit THDA's Title VI Compliance Plan.
- Coordinate activities to affirmatively further fair housing and cultivate relationships with fair housing and local minority serving organizations.
- Lead the research and development of the agency's Analysis of Impediments to Fair Housing Choice and a Fair Housing Strategic Action Plan in cooperation with THDA's Research division, as part of the agency's Consolidated Plan.

THDA Assistant Chief Legal Counsel, Charity Williams, serves as the primary legal counsel for civil rights issues and as the agency's Section 504 Coordinator. In this role, she manages the following activities related to civil rights oversight and compliance:

- 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 routine basis, THDA's Internal Audit division assists with the investigation of Title VI and Fair Housing complaints related to Federal programs directly administered by THDA.

## VI. DISCRIMINATORY PRACTICES

Compliance with Title VI and other non-discrimination laws, such as the Fair Housing Act, is integral to the programs and activities administered by THDA as a housing agency. Through its non-discrimination in services policy, THDA prohibits discrimination on the basis of race, color, national origin, religion, familial status, sex, disability or any other protected class under state or federal law in admission to its programs, services, or activities; in access to them; in the provision of benefits, or in any aspect of operations.

Examples of possible discriminatory practices based on race, color and national origin in THDA's programs and activities are listed below.

- Treating individuals differently when applying for housing, energy/utility assistance, weatherization or home rehabilitation/repair programs
- Misrepresenting the availability of housing, housing assistance, or energy/utility assistance
- Providing different or lesser quality services, rehabilitation or repairs
- Steering clients to a certain neighborhood or community
- Redlining or limiting mortgage lending in a particular area because of the demographics of that area or imposing different conditions for a loan or the servicing of a loan
- Applying different loan servicing terms

## VII. FEDERAL PROGRAMS & ACTIVITIES

A. During FY2024-2025, THDA received \$548,092,251 in Federal financial assistance (FFA) as a primary recipient or sub-recipient of another eligible State entity. **Table 2** details each program and/or activity, purpose or description of the activities supported by the funding, the source of funding, and the dollar amount received (for program and administrative purposes). **Table 3** lists the budgeted FFA for FY 2025-2026.

**Table 2- Chart of Federal Financial Assistance & Purpose of Program, FY 2024-2025**

Program	Purpose/Description	Federal Funding Source	Program Revenue	Admin Revenue
Federally Funded Programs, THDA Primary Recipient & Direct Administrator				
Housing Choice (HCV), inc. Section 811 Non-Elderly Disabled (NED) Vouchers	Provides rental assistance to eligible extremely (ELLI) to low-income (LI) households in privately owned housing. Some households also receive utility assistance or utilize vouchers for homeownership.	HUD	\$52,406,033	\$6,618,983
HCV Mainstream Vouchers	Provides rental assistance for eligible ELI to LI non-elderly persons with disabilities in privately owned housing.	HUD	\$944,622	\$146,610
HCV Emergency Housing Vouchers	Provides rental assistance for eligible ELI to LI households who are homeless, at-risk of homelessness, fleeing/attempting to flee, domestic violence, dating violence, sexual assault, stalking, human trafficking, or were recently homeless or have a high risk of housing instability.	HUD	\$2,152,062	\$276,685
HCV Family Self Sufficiency (FSS)	Administrative funding which facilitates access to external supportive services for HCV participants to help them become self-sufficient & free of public assistance.	HUD	n/a	\$305,964
Homeowners Assistance Fund (HAF)	Aids eligible homeowners who were financially impacted by a COVID-related hardship.	Treasury	\$3,318,553	\$1,335,914

Program	Description	Federal Funding Source	Program Revenue	Admin Revenue
Federally Funded Programs, THDA Primary Recipient, Contracts with Sub-recipient Administrators				
Emergency Rental Assistance (2)	Provides rental and utility assistance payments to eligible households experiencing financial hardship to prevent eviction and displacement.	Treasury	\$62,373,638	\$4,637,109
HOME Investment Partnership*	Provides funding for the production and rehabilitation of single-family housing for LI households. Funding is competitively awarded annually to cities, counties and non-profit organizations.	HUD	\$9,979,695	\$417,570
HOME American Rescue Plan (ARP)	Provides temporary services and assistance to qualifying LI individuals and families to help them regain stability through temporary or permanent housing after experiencing a housing crisis and/or homelessness.	HUD	\$5,003,042	\$335,600
National Housing Trust Fund (NHTF)*	Provides funding to develop and preserve quality affordable housing for ELI households. Funding is competitively awarded to local Public Housing Authorities, non-profit and for-profit housing entities.	HUD	\$5,884,177	\$107,866
Emergency Solutions Grant (ESG), regular, Cares Act*	Provides funding to improve housing stability through homelessness prevention, emergency shelter and related services. Funding is competitively awarded annually to local governments and non-profit organizations in consultation with Continuum of Care (COC) agencies.	HUD	\$3,269,417	\$190,632
Housing Counseling Program	Provides funding to facilitate housing counseling through competitively awarded contracts with non-profit affiliates.	HUD	\$66,975	(\$28,233)

Program	Description	Federal Funding Source	Program Revenue	Admin Revenue
Federally Funded Programs, THDA Primary Recipient, Contracts with Sub-recipient Administrators				
Weatherization Assistance (WAP)*	Provides funding for energy efficiency, weatherization repairs and consumer education for LI households. Funding is awarded non-competitively to human resource, community action and housing development agencies.	DOE	\$3,102,952	\$306,159
Low Income Home Energy Assistance (LIHEAP & LIHEAP Wx)*	Provides funding for energy assistance and energy efficiency and weatherization repairs of dwellings for LI households. Funding is awarded non-competitively to human resource and community action agencies.	HHS	\$87,271,301	\$875,441
State and Local Fiscal Recovery Fund (FAHE)	Provides funding from a State pass through award of Treasury funds to FAHE to facilitate new construction/ rehab of single family and multi-family affordable housing units.	Treasury	\$885,606	\$129,641
Program	Description	Federal Funding Source	Program Revenue	Admin Revenue
Federally Funded Programs, THDA Contract Administrator for Federal Agency				
Section 8 Contract Administration	Monitor compliance and make Housing Assistance Payments for HUD subsidized or low rent properties through a competitively awarded contract.	HUD	\$311,434,178	\$9,572,070
<b>Total Federal Financial Assistance</b>			<b>\$548,092,251</b>	<b>\$25,228,011</b>

\*Funds are paid to subrecipients over a multi-year period (typically 3 years). Program and Admin revenue represents program and administrative revenue received in FYE2025 or carried over from allocation(s) received in a prior fiscal year.

**Table 3- Projected Federal Financial Assistance Budget, FY 2025-2026**

<b>Program</b>	<b>Projected Revenue, Program &amp; Administrative</b>
Housing Choice (HCV), inc. Non-Elderly Disabled (NED) Vouchers	\$ 60,500,000
HCV Mainstream Vouchers	\$ 1,040,000
HCV Emergency Housing Vouchers	\$ 900,000
HCV Family Self Sufficiency (FSS)	\$ 350,000
Homeowners Assistance Fund (HAF)	\$ 2,500,000
Emergency Rental Assistance (ERA-ARP)	\$ 23,000,000
HOME Investment Partnership	\$ 10,325,000
HOME American Rescue Plan (ARP)	\$ 16,000,000
National Housing Trust Fund (NHTF)	\$ 3,400,000
Emergency Solutions Grant (ESG)	\$ 3,200,000
Housing Counseling Program	\$ 60,000
Weatherization Assistance (WAP & BIL)	\$ 14,425,000
Low Income Home Energy Assistance (LIHEAP & LIHEAP Wx)	\$ 78,125,000
State and Local Fiscal Recovery Fund (FAHE)	\$ 11,850,000
Section 8 Contract Administration	\$ 335,000,000
<b>Total Projected Revenue</b>	<b>\$ 560,675,000</b>

- B. Other than administrative fees/revenue (included in Table 2), THDA received no additional federal grants, loans or subsidies to fund programs or activities. Federal administrative revenue represents \$25,228,011 of the total FFA received in FY2024-2025 and funds expenses associated with the program/activity, such as salaries, leases, equipment, technology and training.
- C. THDA received no Federal financial assistance related to land, loans, or federal personnel in FY2024-2025.

## VIII. DATA COLLECTION & ANALYSIS

### A. Race & Ethnicity Characteristics of THDA's Beneficiaries

1. THDA collects beneficiary demographic data, including race and ethnicity, through applications and recertification forms completed by applicants and participants of THDA's programs and activities. The information is collected and updated at intervals determined by the program requirements or Federal governing agency. Beneficiary information includes participants in HUD formula grant and HHS energy programs, tenants in the HUD Section 8 HCV/PBCA programs and LIHTC/MTBA programs, homeowners in the Weatherization Assistance and THDA Homeownership programs and prospective homebuyers in the Housing Counseling programs.
  - Information is retrieved from proprietary databases with information submitted or entered by a sub-recipient, contract agency or originating agent for the following programs: ESG, HOME, HOME-ARP, NHTF, TN HTF, LIHEAP, WAP/LIHEAPx, ERA, SFLO, HCP and HAF programs.
  - Information is retrieved from a proprietary database with information submitted or entered by THDA staff for the HCV programs.
  - Information is retrieved annually from a proprietary database with information submitted or entered by on-site property managers in the LIHTC/MTBA and from the HUD TRACS system for Section 8 Contract Administration Programs.
2. When determining racial and ethnic representation in THDA's programs, the race/ethnicity of beneficiaries or participants in THDA programs<sup>5</sup> is compared

---

<sup>5</sup> The disclosure of race and ethnicity information for most programs administered by THDA is voluntary, and thus, underreporting may occur.

with income eligible Tennessee households by race and ethnicity derived from the following resources:

- Race and ethnicity demographic profiles at the state level geography from the U.S. Census, American Community Survey (ACS), DP05: Demographic and Housing Estimates, 5-Year Estimate (2023)
- HUD Comprehensive Housing Affordability Strategy (CHAS) data, which is a custom tabulation of U.S. Census data for HUD and includes race and ethnicity by HUD’s Area Median Income (AMI) definitions. Most of the programs that THDA administers include income eligibility based on HUD’s AMI or Median Family Income definitions. The most recent data available for CHAS datasets is 2017-2021, ACS 5-year estimates.

3. While income eligibility varies by program, most of THDA’s federally funded programs require participant income to fall between the HUD-determined extremely low and low-income area median income (AMI) at admission. Rental assistance and homelessness programs target a large share of funding to extremely low income (ELI) households (below 30% AMI). The LIHEAP and LIHWAP programs base eligibility on poverty thresholds, which are typically below HUD’s very low-income (VLI) limit (50% AMI). THDA loan and counseling programs assist moderate-income households.

**Table 4- U.S. Census, ACS DP05, 2023 (5 Year Estimate), Demographics of Tennessee Households**

Race				Ethnicity
White, alone	Black/African Am., alone	Other Races, alone <sup>i</sup>	Two or More Races	Hispanic/Latino
71.5%	15.7%	2.3%	3.3%	7.1%

**Table 5- CHAS Estimates by Area Median Income, 2017-2021, ACS 5-year estimates**

Area Median Income by Household Type (Renter & Owner)	Race			Ethnicity
	White	Black/ African Am.	Other Races <sup>i</sup>	Hispanic/ Latino
Extremely Low Income (ELI) Owner	79.3%	14.9%	1.4%	2.8%
ELI Renter	55.5%	35.1%	1.6%	5.6%
Total ELI Households (<30% AMI)	64.4%	27.6%	1.5%	4.6%
Very Low Income (VLI) Owner	81.1%	13.3%	1.2%	3.2%
VLI Renter Households	58.8%	29.2%	1.5%	8.6%
Total VLI Households (30-50% AMI)	70.3%	21.0%	1.4%	5.8%
Low Income (LI) Owner	82.7%	12.1%	1.3%	2.8%
LI Renter Households	62.7%	26.8%	1.6%	6.9%
Total LI Households (50-80% AMI)	74.5%	18.1%	1.4%	4.5%
Owner, 80-100% AMI	83.6%	11.8%	1.2%	2.4%
Renter, 80-100% AMI	66.4%	24.0%	1.9%	6.0%
Total Households, 80-100% AMI	77.7%	16.0%	1.4%	3.7%

**Table 6- Beneficiaries of THDA Administered Programs by Race/Ethnicity**

<i>Program (Federally Funded)</i>	<b>Total</b>	<b>White</b>	<b>Black/ African Am.</b>	<b>Other Race<sup>ii</sup></b>	<b>Two or More Races</b>	<b>Race not answered or collected</b>	<b>Hispanic Latino<sup>iii</sup></b>
HOME Program	144	59.7%	29.9%	10.4%	-	-	4.9%
Na. Housing Trust Fund <sup>iv</sup>	112	50.0%	46.4%	3.6%	-	-	3.6%
HOME ARP	2,075	65.4%	29.0%	1.7%	-	1.4%	3.6%
Emergency Solutions Grant <sup>v</sup>	3,785	66.1%	25.9%	8.0%	-	-	4.5%
Emergency Rental Assistance	6,369	38.7%	42.3%	1.0%	15.4%	2.6%	5.0%
Low Income Energy Assistance <sup>vi</sup>	97,820	51.2%	45.5%	2.0%	<1%	<1%	2.0%
Weatherization Programs <sup>vii</sup>	1028	64.4%	30.1%	3.4%	-	2.0%	<1%
Section 8 Tenant Based Rental (HCV) <sup>viii</sup>	6,198	28.0%	71.0%	1.0%	-	-	2.3%
Section 8 Project Based (HUD low rent apts.) <sup>ix</sup>	29,040	45.4%	53.4%	1.2%	-	-	2.4%
Homeowner Assistance Fund	173	48.0%	42.8%	<1%	1.7%	6.9%	3.5%
Housing Counseling Program <sup>x</sup>	1110	71.9%	20.4%	1.1%	2.9%	3.8%	5.0%
<b><i>Other Programs</i></b>							
LIHTC/MTFBA (multifamily rental development)	69,038	38.8%	49.7%	2.8%	-	8.7%	2.3%
Great Choice Homeownership	3,414	80.1%	14.5%	1.8%	-	1.1%	12.0%
TN Housing Trust Fund <sup>xi</sup>	178	11.2%	86.5%	2.2%	-	-	-

## B. Minority Representation of THDA Staff

THDA employed 303 individuals as of June 30, 2025. All staff are classified executive service. **Table 7** shows the breakdown of THDA staff by race, ethnicity and gender.

**Table 7- Demographic Characteristics of THDA Staff**

Characteristic	Number of Staff	Percent of Total Staff
<b>Race (Non-Hispanic or Latino)</b>		
White	183	60.4%
Black/African American	103	33.9%
Asian/Pacific Islander	4	1.3%
Other (not specified or two or more)	5	1.7%
<b>Ethnicity</b>		
Hispanic/Latino	8	2.7%
<b>Gender</b>		
Female	219	72.3%
Male	84	27.7%

Note: The data in the table above is from THDA's Affirmative Action Plan and includes only the racial reporting categories included above. Race information is not collected for persons who identify as Hispanic or Latino ethnicity.

## IX. LIMITED ENGLISH PROFICIENCY (LEP)

### A. THDA Policy for Providing Meaningful Access

A copy of THDA's policy for Providing Meaningful Access to LEP Persons is in **Appendix C**. THDA's Language Access Plan is published here, <https://thda.org/about-thda/fair-housing-act/>.

### B. Actions to Overcome Language Access Barriers

THDA's LEP policy requires all employees to ensure that LEP individuals have meaningful access to apply, and if otherwise eligible, participate in the services, activities and programs offered by THDA. THDA engages in the following activities to break down barriers with the LEP population:

1. The main phone message is available in both English and Spanish languages.
2. THDA staff, who are proficient in a language other than English, may initially intake and assist an LEP caller or visitor.
3. THDA provides Over the Phone (OTP) language interpretation services to facilitate effective communication with LEP persons (or to interpret and respond to email communication).
4. Language Identification Guides ("I Speak Cards") and OTP language access instructions are available on THDA's Intranet site accessible by all THDA employees.
5. THDA translates vital documents into Spanish and utilizes documents translated into languages other than English by federal funding agencies, where available.
6. THDA's website includes the Google Translate Website Translator widget.

7. THDA's electronic applications (portals) and mobile apps are convertible using Google Translate technology.
8. Annual staff training covers how employees access detailed LEP procedures and resources. THDA conducts in-depth LEP procedural training on an as needed basis, with public facing employees.
9. THDA conducts outreach efforts to reach all citizens, including those in a protected class, for public comments on programs with Federal financial assistance. To improve the effectiveness of citizen participation requests in the planning process, THDA translates all public notices into Spanish and certain notices into other languages commonly spoken in Tennessee.
10. THDA publishes announcements or advertisements for the availability of assistance in direct service programs (HCV rental assistance and Great Choice mortgage programs) in Spanish language newspapers or radio stations.
11. THDA provides Spanish language brochures to sub-recipients of THDA's LIHEAP (energy/utility assistance) and Great Choice mortgage programs to encourage effective outreach to the LEP Hispanic/Latino populations.
12. THDA offers reimbursement (up to \$400) to Housing Counseling Program network partners who provide up to four hours of one-on-one interpretation of housing counseling materials.

Examples of translated public notices, brochures and marketing materials are in

**Appendix D.**

### C. List of Translators or Interpreter Services

THDA employees are required to contact a qualified OTP interpreter from AVAZA Language Services Corporation (under state contract), Nashville, TN, phone: (615) 534-3400. Bi-lingual THDA employees may provide introductory interpretation to determine how to assist a

visitor or caller. Once the initial reason for an inquiry is determined, the THDA employee must connect with an AVAZA OTP interpreter for all formal interactions. A list of bi-lingual THDA employees is in **Appendix E**. For written translation of vital documents not available through another reliable source, such as a federal agency, and for public notices and summaries, THDA contracts with ASTA-USA, Dallas, Texas, phone: (817) 717-1493 or accesses services through the State of Tennessee contract with the Tennessee Language Center (University of Tennessee).

## D. Translated Vital Documents

THDA has identified Spanish as the most common language spoken, other than English, in THDA's service areas. Almost half of Spanish speakers in Tennessee are LEP. THDA contracts with the translation agencies identified above to translate vital program documents into the Spanish language where translations are not available through another source, such as the federal funding agency.

For federal programs, THDA also utilizes translated written resources and materials made available through federal agencies. A list of translated documents for use in THDA's federal and non-federal programs is in **Appendix F**. Where a THDA program participant speaks a language other than English or Spanish and a vital program document is not available, THDA provides oral translation (OTP) of the document or information to ensure effective communication with LEP persons.

## E. Language Encounters

During FY 2024-25, Spanish was the predominant language group, other than English, encountered by THDA staff, sub-recipient and contract agencies. THDA or its sub-contractors provided language assistance during 403 telephone or in person encounters during the fiscal year with 94 percent involving Spanish language speakers. **Table 8** displays the language assistance provided by language and month during the past fiscal year.

**Table 8- Language Assistance by Month, FY 2024-25**

<b>Month/Year</b>	<b>Spanish</b>	<b>Arabic</b>	<b>Vietnamese</b>	<b>French</b>
July 2024	21	1	0	0
August 2024	20	3	1	0
September 2024	34	4	3	0
October 2024	42	2	1	0
November 2024	33	1	2	0
December 2024	22	0	0	0
January 2025	48	1	1	1
February 2025	15	1	0	0
March 2025	50	0	0	0
April 2025	33	0	0	0
May 2025	26	1	0	0
June 2025	36	0	0	0
<b>FY Totals</b>	<b>380</b>	<b>14</b>	<b>8</b>	<b>1</b>

Sub-recipients of THDA’s federal funding provide information on LEP encounters through the Non-Discrimination in Services Self-Survey. Spanish is the language most frequently encountered in FYE2025, other than English, by sub-recipients carrying out programs or activities on THDA’s behalf.

## X. COMPLAINT PROCEDURES

### A. Filing a Complaint

THDA provides discrimination complaint procedures on the website, <https://thda.org/fair-housing-complaints/>, and information on how to file a discrimination complaint or grievance is distributed to beneficiaries of direct service programs, including those programs administered by a contractor or sub-recipient agency, during the application process and the annual recertification process, where applicable.

For consideration by THDA, a complaint must be filed, in writing, no later than 180 days after the last date of the alleged adverse action. All individuals who contact THDA with a verbal complaint of discrimination are directed to submit their complaint in writing and provided THDA's complaint form or a web link to access an online complaint form. Complaints submitted by email or mail with sufficient information are considered written complaints. The complaint must include the following information to allow THDA to conduct an initial review and determine jurisdiction:

- Name, address and contact information for the complainant.
- The name of the THDA program for which the complainant applied or is a participant.
- The name of the person or entity who the complainant alleges engaged in an adverse action(s) or decision ("respondent").
- The date or dates on which the alleged adverse action(s) or event(s) occurred.
- The basis of the complaint (e.g., race, national origin, disability).
- A description of the adverse action that led the complainant to feel discrimination was a factor.
- Names, addresses and phone numbers of people who may have knowledge of the event where applicable.

## B. Total Number of Complaints

During FY2024-25, THDA received six (6) complaints alleging discrimination covered under Title VI. All six complaints alleged race-based discrimination. Three complaints were determined to be non-jurisdictional because the named respondent was not a THDA employee or subrecipient, or in one case, the program was not covered by Title VI. All three complaints were dismissed by THDA with notification to the complainant and referral to the appropriate jurisdictional agency. One complaint, identifying a THDA subrecipient entity as the respondent, was submitted anonymously (without complete name, address or contact information). The complaint was dismissed due to the lack of required information. A limited monitoring review of the sub-recipient agency's beneficiary application process was completed to ensure compliance. The review found the agency compliant with required procedures and found no support for the allegations in the anonymous complaint. Two complainants submitted an initial complaint either verbally or by email or text but failed to respond to THDA's request for additional information necessary to support a determination of jurisdiction or basis of discrimination. The complaints were closed without determination.

## C. Substantiated Complaints

During FY 2024-2025, THDA had no substantiated complaints of Title VI discrimination.

## D. Complaint Log

THDA's Title VI complaint log is included with this report as a non-public appendix to protect personally identifiable information.

## E. Complaints Form

A copy of the THDA Discrimination Complaint form in both English and Spanish is in **Appendix G.**

## F. Title VI Complaint Investigation Procedures

A copy of THDA's complaint investigation procedures is in **Appendix H**.

## G. Federal Complaints

THDA has no pending Federal complaints on file.

## H. Lawsuits or Litigation

One lawsuit (22-0908-111) filed on July 1, 2023, in the Chancery Court of Davidson County, alleging discrimination in employment by THDA covered under Title VI, was settled between the parties and a voluntarily dismissal was entered by the court on July 12, 2025.

## XI. TITLE VI/NON-DISCRIMINATION TRAINING

### A. Training Program Description

THDA requires all new employees to complete comprehensive Title VI, Fair Housing and non-discrimination training, and a knowledge quiz, within the first six months of employment (during the probationary period). THDA requires all employees to complete non-discrimination training annually to ensure understanding of and compliance with Title VI, Fair Housing and other Federal, state and agency non-discrimination requirements, policy and procedures, and relevant updates to departmental guidance and implementing regulations. A copy of THDA training materials presented in FY2024-2025, and the new employee quiz, is in **Appendix I**.

### B. Training Data

During FY2024-2025, 287 employees (99.7%) completed annual Title VI training, and 36 new employees completed new employee non-discrimination training (100% of new employees completing the probationary period)

**Table 9- Non-Discrimination/Fair Housing Training, FY2024-2025**

Training Description/Host/Date	THDA Staff		Sub-recipient Coordinators	
	#	%	#	%
New Employee Non-Discrimination Training (virtual training video & quiz), THDA, completed at own pace during probationary period	36	100%		
All Employee Annual Non-Discrimination Training update (virtual training video), THDA, completed at own pace between May 15, 2025 & June 15, 2025	287	99.7%		

Subrecipient Annual Title VI/non-discrimination Training (virtual training video), THDA, completed at own pace by June 15, 2025			105	83%
---------------------------------------------------------------------------------------------------------------------------------	--	--	-----	-----

### C. Future Training

All new employees will continue to complete Title VI/non-discrimination training during their initial probationary period in FY2025-2026, and THDA will require annual Title VI/non-discrimination training for all employees in the fourth quarter of 2026. THDA will continue the practice of requiring the Title VI Coordinator for all sub-recipient entities to complete online Title VI/non-discrimination training during the fiscal year and to encourage subrecipients to require all employees working in THDA funded grant programs to complete THDA’s training program.

## XII. SUB-RECIPIENT MONITORING

THDA monitors sub-recipients of THDA's federally funded programs in a manner consistent with the federal guidance from the oversight agency for each individual program, or in the case of the HUD PBCA Program, the language in the Annual Contributions Contract (ACC).

### A. Pre-Award Procedures

1. General Procedures. THDA conducts a limited pre-award review of the applicant/sub-recipient agency for all applications of Federal funding prior to approval. The review ensures that THDA does not provide funding to applicants with unresolved findings of non-compliance under Title VI (or Fair Housing where applicable) or other federally obligations, or that appropriate conditions are included prior to approval to ensure compliance.
2. Pre-Assessment or Self-Survey. THDA does not require a pre-assessment or self-survey, or other field or on-site compliance prior to the award of funding because the Federal requirements and guidance in the programs where THDA is a primary recipient do not require a pre-assessment prior to the award of funding.
3. THDA's standard contract with sub-recipients includes a clause or assurance of non-discrimination on the basis of race, color, national origin, handicap or disability, age, religion, sex, or any other classification protected by federal, Tennessee state constitutional, or statutory law in the administration of the grant or contract and in employment practices. **Appendix J** includes required information for all THDA subrecipients, vendors and contractors, and notes those who have signed a contract with the non-discrimination clause or assurance.
4. On Site Field Reviews. THDA does not conduct an on-site field review prior to the award of funding because the Federal requirements and guidance in the programs where THDA is a primary recipient do not require a pre-assessment review.

5. Training. THDA includes a summary of Title VI and Fair Housing sub-recipient obligations and compliance requirements in Grantee Application workshops for HUD formula grant programs (pre-award).
6. Additional Pre-Award Procedures. There are no additional pre-award procedures, other than those described in 1-5.

## B. Post-Award Procedures

1. THDA's Program Compliance division monitors a percentage of sub-recipients from HUD formula grant programs, LIHEAP and Weatherization, typically monitoring all sub-recipients over a three-year contract award period. THDA's Compliance division determines the frequency and number of compliance reviews conducted annually in accordance with federal regulations and agency policy and maintains a log of individual monitoring reports. The content of monitoring reviews varies based upon federal guidance for each program and is described briefly below:

- HOME Investment Partnership. THDA's HOME Operations Manual (<https://thda.org/pdf/HOME-operating-Manual.pdf>) covers record keeping and reporting requirements (primarily established by HUD guidance) when conducting post-award compliance reviews. A desk review occurs of rent rolls, financials, applicant and tenant files, including income determination and fair housing, Title VI and VAWA requirements, including LEP practices, owner obligations and conflict of interests. A physical inspection is conducted to determine compliance of housing units with HUD housing quality standards.
- National Housing Trust Fund. THDA follows HUD monitoring guidance and requirements, which mirror the requirements for the HOME Investment Partnership Program stated above.

- Emergency Solutions Grant. THDA follows HUD monitoring guidance and the THDA ESG Monitoring Manual when conducting compliance reviews. The ESG monitoring review includes a desk review for compliance with HUD’s requirements for written standards, policies and procedures and client eligibility. The review ensures that applicant files are accurate and complete, and all applicants are being notified of their Title VI and fair housing rights (including posted notices), other non-discrimination and grievance and appeals policy. A physical inspection is conducted to ensure all locations are Section 504 compliant and meet HUD habitability standards.
- LIHEAP and Weatherization Programs. THDA monitors LIHEAP and Weatherization sub-recipients based on DHHS and DOE requirements respectively. The review includes non-discrimination policies in relation to both employment practices and beneficiaries, along with LEP practices.

2. **Table 10** details compliance monitoring reviews completed in the past fiscal year by Federal program or activity.

**Table 10- Compliance Monitoring Reviews, Federal Programs, FY2024-2025**

Program	Desk Reviews	On-Site Reviews	Annual Compliance Summaries
Emergency Solutions Grant (PY2023 & PY2024)	369		
HOME (Rehab PY21 & PY22)	77		
HOME (Rental)	19		69
Low Income Home Energy Assistance (PY24 & PY25)	1373		
National Housing Trust Fund (NHTF)	16		15
Performance-Based Contract Administration (MORs)		212	
Weatherization Assistance (PY2023 & PY2024)	52		
<b>Total</b>	<b>1854</b>	<b>212</b>	<b>264</b>

3. Table 10 details the number of annual reviews. **Appendix K** includes a copy of annual sub-recipient monitoring forms by program. **Appendix L** includes a copy of THDA's Non Discrimination in Services Self Survey completed annually by subrecipient agencies. During FYE 2025, self-surveys for 88 subrecipient agencies were reviewed.
4. 212 on-site compliance reviews were completed during FY2024-2025.
5. THDA completes limited monitoring for compliance with Title VI/non-discrimination requirements through collection of information from subrecipients in a Non-discrimination in Services Self Survey. THDA has limited oversight of Project Based Section 8 properties (low-rent apartments) through a performance-based contract with HUD, which currently does not include Civil Rights Front End Limited Monitoring. THDA sub-contracts monitoring activities with CGI, Inc., who completes the HUD required activities.

### C. Sub-recipient Title VI Training

THDA offers Title VI/non-discrimination training annually to sub-recipient agencies through an online training platform. A copy of the THDA annual sub-recipient training agenda/materials presented in FY2024-2025 is in **Appendix M**. The Title VI Coordinator, and in some cases, other employees from 105 subrecipient agencies completed THDA's virtual non-discrimination training in FYE2025, which represents 83 percent of sub-recipient agencies. THDA collects information from sub-recipients on their training programs for employees, including the number who complete training in the annual non-discrimination in services self-survey.

### D. Procedures for Non-Compliance

THDA's Program Compliance division monitors for sub-recipient compliance using procedures that are specific to each federal program's monitoring requirements. The Civil Rights Compliance office assists with collecting information on sub-

recipient activities for Title VI and other non-discrimination requirements. Typically, when a concern or finding is noted in a monitoring review, THDA notifies the sub-recipient in writing no later than 60 days after the end of the monitoring review of the concern or finding.

1. LIHEAP. Subrecipients are required to respond to findings (within 30 days of receiving the monitoring letter), by submitting a Corrective Action Plan. Subrecipients have the option to respond to concerns or observations (pages 50&51 of the LIHEAP 2024 Policy Manual).
2. WAP. Subrecipients are required to respond to findings and concerns (within 30 days of receiving the monitoring letter), by submitting a Corrective Action Plan (page 90, Section 15.6 of the WAP Manual).
3. HOME & NHTF. Subrecipients are required to respond to findings (within 30 days of receiving the monitoring letter), by submitting a Corrective Action Plan and the Compliance Team has the option to require subrecipients to respond to Concerns (section I of the HOME Monitoring Guide). Findings must be remedied or brought into compliance within 30 days of the notice.
4. ESG. Subrecipients are required to respond to findings (within 30 days of receiving the monitoring letter), by submitting a Corrective Action Plan. They are not required to respond to concerns or observations (page 8; Section 2-8; (B) of HUD's CPD Management of Monitoring Activities Chapter 2).

No sub-recipients, vendors or contractors were found to be noncompliant with Title VI through Compliance Division reviews in the past fiscal year.

## E. Sub-recipient, Contractor & Vendor Information

1. All THDA programs funded through Federal financial assistance and administered by sub-recipients are listed and described in **Table 2**. The following programs administered by THDA distribute Federal financial assistance to sub-recipients: HOME,

HOME-ARP, ESG, NHTF, HCP, Weatherization and LIHEAP. THDA contracted/granted Federal financial assistance to 128 sub-recipient entities during FY2024-2025. A sub-recipient may manage more than one THDA grant or program activity; may have multiple active contracts during a fiscal year and a grant award may be expended across multiple fiscal years.

2. **Appendix J** provides a detailed list of the sub-recipients receiving grants funded through both THDA’s Federal financial assistance and THDA or state funding in FY 2024-2025, along with the dates of the contract, funding award, location, type of funding and funding agency, description of services

## F. Statement of Assurance

**Appendix J** includes a list of all subrecipients, vendors and contractors who signed a statement of assurance.

## G. Minority Contractor Participation

147 contracts with 128 vendors or contractors were active during FYE2025. **Table 11** details Minority/Women’s Business Enterprise (M/WBE) statistics for businesses registered with the State of Tennessee as minority and/or women business enterprises.

**Table 11- Minority/Women’s Business Enterprise (M/WBE)**

Total Number of Vendors/Contractors	128
Number of M/WBE Vendors	5
% M/WBE Vendors	4%
Total Contract Expenditures Awarded to M/WBE Vendors	\$1,235,000
% of All Contract Expenditures Awarded to M/WBE Vendors	1.6%

## H. New Contracts

THDA signed new contracts with 132 sub-recipients and 40 vendors/contractors in FY2024-2025. New contracts are noted in **Appendix J**.

## I. Contractual Provisions

All THDA contracts with subrecipients include standard nondiscrimination language/assurance: The Grantee agrees 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 handicap or 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.

## J. Pending FFA Applications

As of 6/30/2025, applications for renewal funding for the Weatherization, HOME, ESG, and National HTF were pending approval. No applications for new allocations of FFA were pending.

## K. Federal Program Monitoring

A federal monitoring review for THDA's Weatherization Assistance was conducted by DOE from July 29 to August 1, 2024, and December 9 to December 13, 2024, to monitor the Weatherization BIL program. DOE also conducted a limited review of the Weatherization formula grant. The monitoring reviews identified multiple deficiencies relevant to program operations, subrecipient monitoring or financial management. No deficiencies related to Title VI or other non-discrimination requirements were found. THDA submitted (and DOE accepted) a Corrective Action Plan to remedy the deficiencies within the required DOE timeframe.

No other divisions reported federal program monitoring during the past fiscal year.

## XIII. PUBLIC NOTICE & OUTREACH

### A. Information Dissemination to the Public

1. 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/housing-discrimination-complaints-assistance>

THDA's website disseminates information on THDA's non-discrimination statement and grievance policy, and rights and responsibilities under the Fair Housing Act, Title VI, Section 504 and other non-discrimination laws and regulations. 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>.

Sub-recipients of THDA's HUD grant funding are required to post HUD's Fair Housing poster (<https://www.hud.gov/sites/documents/928.1.pdf>) in a visible location, display the Equal Housing Opportunity logo on all program materials and disseminate HUD Fair Housing brochures to all applicants and participants. All subrecipients are required to post a non-discrimination assurance in a public location, such as a website or office.

2. THDA currently informs the public about its programs and services through the following means:
  - THDA website ([www.thda.org](http://www.thda.org))
  - Social media (<https://www.facebook.com/TNHousing/>, @tn\_housing)
  - Paid Advertisements- online and print
  - Email blast (Constant Contact) lists

- TNHousingSearch.org
  - News releases
  - Industry meetings
  - Public meetings
  - Radio and television interviews about THDA programs
  - Public service announcements
  - Public speaking engagements
  - Workshops/Conferences (sub-recipients, housing industry, other state agencies and special interest groups)
3. THDA's complaint procedures are available on the website at <https://thda.org/about-thda/fair-housing-know-your-rights/housing-discrimination-complaints-assistance> and are disseminated to direct service program applicants and beneficiaries.
4. Planning and advisory board outreach is described below in the Boards and Advisory Boards section.

## B. Minority Media Utilization

THDA utilizes minority media outlets (where available) to advertise the availability of program assistance in directly administered FFA programs and to advertise THDA's loan programs. THDA places paid advertisements when waiting lists are opened in the HCV program and periodically for the Great Choice mortgage programs in the Tennessee Tribune, El Crucero de Tennessee, La Campana and La Prensa Latina. The percentage of information disseminated in minority media is not tracked. Examples of translated advertisements or outreach brochures are in **Appendix D**.

An ongoing goal of THDA's purchased media plan with media vendor (Bohan) for the Great Choice loan program is to expand outreach and drive statewide awareness of the

loan programs across all populations, including minority populations, using both mainstream and niche publications and select radio stations. To expand awareness among minority populations, during FY 2024-2025, print or display ads were purchased in the Chattanooga News Chronicle (East), La Campana and the Tennessee Tribune (Middle) and La Prensa and Tri-State defender (Memphis area). Examples of print ads in the Spanish language are in **Appendix D**. Radio ads were purchased on regional Spanish language radio stations: Chattanooga: WOCE/WQMT, Knoxville: WKZK, Nashville: WNVL/WMBD, Memphis: WGSF/WGUE.

### C. Engagement, Minority Organizations or Communities

THDA has worked to build relationships and holds memberships in women and minority-centered organizations and regularly attends functions and activities of the associations to share information on THDA's programs, particularly homeownership programs. The organizations include:

- Tennessee chapters of the National Association of Real Estate Brokers/Realists (NAREB), an organization with the goal of bringing together the nation's minority professionals in the real estate industry;
- National Association of Hispanic Real Estate Professionals (NAHREP);
- Tennessee chapters of the Women's Council of Realtors;
- Tennessee chapters of the Black Chamber of Commerce;
- National Association of Asian American Professionals;
- Tennessee Latin American Chamber of Commerce;
- National Association of Minority Mortgage Bankers of America (NAMMBA)

Additional outreach targeted to minority organizations or communities in FY2024-2025 included:

- THDA’s Civil Rights Compliance Advisor routinely updates the agency’s contact list of minority service and other diverse organizations and ensures the list is available for program outreach and public comment opportunities.
- THDA’s Civil Rights Compliance Advisor is a member of the Middle Tennessee NAACP housing committee and participates in quarterly meetings to share information on THDA’s programs and activities.
- THDA continued to support outreach associated with the CONVERGENCE program, which is an initiative to increase homeownership among Black/African American households focused in the Memphis area that is led by United Housing, Inc.

#### D. Boards & Committees

- 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 may represent the following groups: homebuilding (may represent retail building/material supply/manufactured housing), 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 (to serve on the Rental Assistance committee). The Speaker of the State Senate and the Speaker of the State House of Representatives each appoint 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 members of the Board. Detailed information on the

members of THDA’s Board of Directors, their representation, their committee assignments and their race and gender are in **Appendix N**.

As of June 30, 2025, thirteen of the fifteen positions on the THDA Board of Directors were appointed (filled). The board included three minority members (23 percent) and two female members (15 percent). More information, including information on the current Board, is available on THDA’s website: <https://thda.org/about-thda/board-of-directors/board-members>.

- **Industry Advisory Boards.** THDA currently has two industry advisory boards. Advisory board members are not appointed, but rather, THDA staff and leadership in the relevant program areas invite individuals to serve on each advisory board who work directly with THDA’s programs and represent a range of specialties within the housing industry, geographies (across the state and well as urban/rural) and demographics. While THDA’s advisory boards do not directly influence agency policy, they 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.

**Table 12- THDA Industry Advisory Boards**

<b>Advisory Board</b>	<b>Web Link (Description &amp; Board Members)</b>	<b>% Minority</b>	<b>% Female</b>	<b>Total</b>
Energy Efficiency & Weatherization Advisory Board	<a href="https://thda.org/about-thda/advisory-boards/energy-efficiency-and-weatherization/">https://thda.org/about-thda/advisory-boards/energy-efficiency-and-weatherization/</a>	0%	33%	6
Housing Industry Advisory Board	<a href="https://thda.org/about-thda/advisory-boards/housing-industry/">https://thda.org/about-thda/advisory-boards/housing-industry/</a>	33%	75%	24

The Energy Efficiency and Weatherization Advisory Board advises THDA on how to improve policies, procedures, public awareness, and financial assistance allocations related to energy efficiency and weatherization programs. Members represent a broad range of organizations and agencies with expertise to advise THDA on how best to enhance the quality and resilience of housing and utility efficiency for low- to moderate-income Tennesseans.

The Housing Industry Advisory Board collaborates on key issues surrounding homeownership programs, challenges, and opportunities in the housing market; as well as providing expert guidance around building strong, equitable communities through housing and financial education. Members are selected based on their experience and history in mortgage lending and housing/homebuyer education. Each member is either employed by a THDA approved lender or bank or is a housing and financial educator in THDA's affiliate network or is a realtor.

- HCV Resident Advisory Board. As per HUD requirements (24 C.F.R. 964.11), THDA maintains a volunteer Resident Advisory Board for the HCV program. The Board provided feedback at least annually on THDA's HCV Administrative Procedures Manual, Five-Year and Annual Plans, along with providing feedback on HCV public awareness efforts. The Board consists of a maximum of fifteen (15) members. Membership is generated by a mass mailing to all HCV program participants on an annual basis. Program participants may volunteer for the RAB if they are currently in good standing with the THDA, which means the participant does not have any termination proceedings pending or a history of program family obligation violations. If more than fifteen (15) persons volunteer for the Board, the THDA will utilize a random selection process that proportionately represents the East, West, and Middle divisions of the state. Each Board Member serves for a one-year period and may volunteer for additional consecutive or non-consecutive terms of service. If a current Board Member discontinues their HCV rental assistance or is

terminated from the HCV program, the participant immediately forfeits the right to serve on the Board in any capacity. The current board is comprised of ten (10) members, and 80 percent of the members are in minority group. The Board member roster is not public due to Privacy Act protections for participants in the HCV program.

## E. Minority Input

1. THDA seeks minority input through a variety of formal and informal activities described below.

- Public notices for funding availability and public comment are placed in major publications throughout the state and in targeted minority newspapers where available, including Spanish language newspapers. Examples of Spanish public notices are in **Appendix D**. Public notices and documents soliciting public comment are provided in English and Spanish versions on THDA's website and may be translated into other languages, commonly spoken in some Tennessee communities, such as Arabic, Chinese, Korean, Kurdish, Laotian, Somali and Vietnamese.
- The State of Tennessee Citizen Participation Plan is THDA's primary strategy for public participation that incorporates citizen input into the planning, implementation, coordination, and assessment of Tennessee's projects and activities under the Consolidated Plan. In accordance with the Citizen Participation Plan, THDA solicits citizen participation regarding Consolidated Planning programs using email invitations, newsletters, flyers, and postings to state websites, development district websites, and social media (Facebook and Twitter). Comments solicited through the Citizen Participation Planning process are maintained for review (including public review).
- THDA maintains a minority-serving, diversity organization contact listing (includes minority and other protected class advocacy organizations, Hispanic/Latino

serving and disability organizations) to ensure public notices and program notices are distributed to diverse organizations, particularly those notices that are managed through the Citizen Participation Process.

## 2. Notification of Grant Funding or Request for Bids (Contracts)

- THDA's Community Programs division, with THDA Board approval, determines the application and selection process, as well as the public notification process, for competitive grants or sub awards of Federal funding allocations for the HUD formula grant programs and the TN Housing Trust Fund. HUD or THDA's Board of Directors may set priority in awards based on certain factors or for certain entities. The grant application and workshop dates, along with any allocation plan, is posted to THDA's website each year with the deadline for applications. In those cases, an email announcing the application and grantee workshop dates and allocation plan information is sent to entities on THDA's constant contact lists, including those entities in a priority category, current or prior funding recipients and the diversity organization contact list. The Single Family Loan Operations division (Housing Education department) determines the application and selection process, as well as the public notification process, with THDA Board approval, for the Housing Counseling Programs.
- THDA's **Comprehensive Procurement Policy (Appendix O)** is followed when procuring goods and services, including public notice procedures. For any procurement or purchase not covered by THDA's Procurement Policy, THDA follows the State of Tennessee, Department of General Services, procurement policy. In general, procurement and purchasing are guided by THDA Operations Division who works with leadership in THDA's program divisions to identify the need for a service or good; identify potential vendors, solicit bids through a request for proposals and execute contracts with vendors. THDA utilizes the State's Diversity Business Certified Directory to assist in the search for qualified minority and women owned businesses. THDA also includes the following

standard non-discrimination language in its Request for Proposals and Invitation to Bid.

THDA Invitation to Bid: 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: 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 requires sub-recipient agencies to develop written procurement policies that are compliant with State and THDA guidance when contracting for goods or services. Sub-recipients of Federal financial assistance must comply with 2 CFR 200 (Federal Award Financial Requirements). Agencies administering grants funded by HUD must follow 24 CFR 85.36 (Procurement Policies), which includes affirmative steps to contract with small and minority firms, women's business enterprises and labor surplus area firms. THDA reviews sub-recipient compliance with procurement requirements during monitoring.

## XIV. COMPLIANCE REPORTING

### A. Title VI Compliance Reports

THDA does not submit Title VI Compliance reports to any federal or state agency, other than the Tennessee Department of Human Resources.

### B. Federal Reporting Requirements

1. HUD has oversight for the following programs: HOME Investment Partnership (24 CFR Part 92), HOME-ARP, National Housing Trust Fund (24 CFR Part 93), Emergency Solutions Grant (24 CFR Part 576), Housing Counseling Program (24 CFR Part 214), Section 8 Housing Choice Voucher (24 CFR Part 982) and Section 8 Project Based Rental Assistance (24 CFR Part 983).<sup>6</sup>
  - 24 CFR Part 91 requires consolidated State planning, application, and reporting processes across the community development and planning programs, which includes the HUD formula grant programs administered by THDA (HOME, ESG, NHTF). The latest Consolidated Plan covers 2020-2024, and is posted here: [https://thda.org/pdf/RP\\_2020-ConPlan\\_Final\\_Updated.pdf](https://thda.org/pdf/RP_2020-ConPlan_Final_Updated.pdf). The 2025-2029 Consolidated Plan was submitted to HUD timely and is pending approval. The Consolidated Plan is carried out through Annual Action Plans, which provide a summary of the actions, activities (including fair housing activities) and the specific federal and non-federal resources that will be used each year to address the priority needs and goals identified by the Consolidated Plan. The most recent approved Annual Action Plan is on the THDA website: <https://thda.org/pdf/2022-2023-Annual-Action-Plan-with-Full-Appendix.pdf>.

---

<sup>6</sup> THDA's responsibilities are limited to monitoring activities in the performance based contract with HUD.

HUD requires formula grant program recipients to submit a Consolidated Annual Performance and Evaluation Report (form HUD-40110-D) within 90 days of the end of the recipient's program year to report performance outcome measures. THDA's most recent CAPER report for the HOME, ESG and NHTF programs is published on THDA's website: <https://thda.org/pdf/2019-20-CAPER-Final.pdf>

- For the Housing Choice Voucher Program (HCV), HUD requires monthly electronic financial reporting of form HUD-52681-B through the Voucher Management System (VMS). PIH Notice 2011-65 requires timely electronic reporting through the Public and Indian Housing Information system of the form HUD-50058, which provides information to HUD on the people who participate in the program (including demographic and income information).

24 CFR Part 903 requires PHAs who administer the HCV program to submit an Annual and Five Year Plan in the HUD prescribed format (form HUD-50075). The Plans are a comprehensive report on program policies, operations, and strategies for meeting local housing needs and goals, and include assurances for meeting civil rights objectives. THDA's Annual and Five Year 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>.

24 CFR 985 requires a PHA administering the HCV program to conduct an annual Section 8 Management Assessment Program audit and submit a Certification (Form HUD-52648) electronically within 60 days of the end of its fiscal year. As part of the annual planning and Section 8 assessment program, THDA creates maps showing Re/cap areas, or racially concentrated areas of high poverty concentration where Section 8 voucher holders reside (<https://thda.org/research-reports/thda-program-data/single-family-reports/housing-choice-voucher-county-maps> ).

- For the Housing Counseling Program, HUD requires reporting through HUD form-9902, also considered the Housing Counseling Activity Report. This report captures all of a HUD-approved HCA's client-specific education and counseling activities within HUD's fiscal year. The HUD-9902 includes race, ethnicity and income levels of all clients provided counseling services (except where the client chooses not to report their race/ethnicity).

## 2. Other Federal Programs

- DHHS has oversight for the Low Income Home Energy Assistance Program (LIHEAP) under 45 CFR 96. Uniform Administrative Guidance is located at 45 CFR Part 75. Under 45 CFR Part 96.82. Each grantee is required to submit a report on households receiving LIHEAP assistance during the 12-month period corresponding to the Federal fiscal year (October 1-September 30) preceding the fiscal year for which funds are requested requires.
- DOE has oversight for the Weatherization Assistance Program under 10 CFR Part 440 and requires limited reporting under 10 CFR 440.25.
- The Department of Treasury has oversight for the temporary Covid-19 relief programs: Emergency Rental Assistance (ERA-2) and Homeownership Assistance Fund (HAF) created under the American Rescue Plan Act of 2021. ERA-2 and the Homeowner Assistance Fund are established by section 3201 and 3206 respectively of the ARPA of 2021, Pub. L. No. 117-2 (March 11, 2021). Emergency Rental Assistance (ERA-2) recipients follow reporting guidance found on Treasury.gov (<https://home.treasury.gov/system/files/136/ERA-Reporting-Guidance-v2.pdf>.) Treasury requires HAF administrators to follow reporting guidance dated August 8, 2022 found here: (<https://home.treasury.gov/system/files/136/HAF-Guidance.pdf>).

Treasury also provides oversight for the Low-Income Housing Tax Credit program (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.). Treasury does not designate LIHTC as Federal financial assistance, and required federal reporting is limited. The 2008 Housing and Economic Recovery Act (HERA) requires each housing finance agency (HFA) that administers LIHTC to submit certain demographic and economic information on tenants in LIHTC units to HUD. HERA specifically requires HFAs to submit information concerning race, ethnicity, family composition, age, income, use of rental assistance, disability status, and monthly rental payments of households residing in LIHTC properties. THDA submits this information to HUD as per the HERA statute and reports the same information in THDA's Title VI Plan (Section VIII. Data Collection & Analysis).

### C. Title VI Audits

During FY2024-2025, no Federal or state agency conducted a Title VI-related audit or review of THDA's programs or activities.

## XV. EVALUATION PROCEDURES

- A. THDA evaluates access to affordable housing opportunities by diverse populations, including THDA's programs, through the Consolidated Planning process (required by HUD for formula grant recipients, which occurs on a five-year cycle and is described above in XIV. Compliance Reporting. Through this process THDA evaluates affordable housing needs across the state (by development district) and identifies potential impediments or barriers to affordable housing, THDA's programs and fair housing choice.

THDA reports accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER). The current HUD-approved Consolidated Plan (including the Fair Housing Plan) and the CAPER are published to THDA's website: <https://thda.org/research-reports/consolidated-planning>.

- B. THDA evaluates service quality and considers the beneficiary demographic evaluation completed during Title VI planning, and described in Section VIII, during both the five-year Consolidated Plan and Annual Action Plan activities. THDA also evaluates service quality in the Housing Choice Voucher Program through the HUD-required Annual and Five-Year Plan process and through conducting an annual HUD-required Section 8 Management Assessment Program (SEMAP) audit. SEMAP is designed to assess HCV program performance on HUD established performance metrics. THDA's Housing Choice Voucher Annual and Five-Year Plans are published to the website, <https://thda.org/help-for-renters/hcv-administrative-plans-policy-and-rules/>. HUD's SEMAP evaluation form and performance indicators is published to HUD's website online, <https://www.hud.gov/sites/dfiles/OCHCO/documents/52648.pdf>.

- C. THDA takes actions to strengthen overall Title VI performance through the Title VI Implementation Plan evaluation completed annually, through actions outlined in THDA's Fair Housing Plan that involve Title VI protections, and through inclusion of Title VI and other non-discrimination measures in compliance monitoring activities. Where a Title VI

or fair housing compliance deficiency is identified, THDA's Legal Division works with the appropriate program division(s) and the Program Compliance division to develop a Corrective Action Plan. THDA's Assistant Chief Legal Counsel and Title VI Coordinator are responsible for ensuring appropriate corrective action occurs in a timely manner.

- D. The State's 2025-2029 Consolidated Plan was submitted timely to HUD in FYE2025 and is currently pending HUD approval. CAPER reports outlining annual progress toward the goals set within the Consolidated Plan are submitted annually to HUD 90 days before the end of the program fiscal year (September 30)). THDA submitted a timely HCV Annual Plan to HUD during FYE 2025, and HUD approved the Plan in April 2025. The Plan is due 120 days prior to the agency's fiscal year. If a Title VI or fair housing compliance deficiency is identified, THDA requires a corrective action plan to be developed within thirty (30) days of the date of a compliance finding. The corrective action plan should identify a reasonable timeline for remediation of the deficiency(ies).

## Endnotes

---

<sup>i</sup> In the US Census data, “Other Races” includes Asian, American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, and Some Other Race categories, all of which individually represent less than 3 percent of the state population. Data for some race/ethnicity categories is now suppressed to comply with U.S. Census enhanced disclosure avoidance protections.

<sup>ii</sup> Other includes the following categories: Asian, Am. Indian/Alaskan Native, Native Hawaiian/Pacific Islander, and where reported, two or more races. The most common category reported in the CHAS data within the two or more race area is White and Black or African American.

<sup>iii</sup> Where the total is greater than 100%, it is due to program reports not isolating race and ethnicity reporting, which causes Hispanic/Latino households to be counted in both a race and ethnicity category. In these programs, the total number of beneficiaries is not duplicated or inflated in the table, but the households are reported in both race and ethnicity categories.

<sup>iv</sup> Data is limited to the occupants of units placed in service in the most recent reporting period and does not include occupants of funded properties placed in service in prior reporting periods but that are still in an affordability period.

<sup>v</sup> Data (and total) includes each sheltered individual, including children, not just the head of household.

<sup>vi</sup> Data includes every individual within an assisted household, not just the head of household.

<sup>vii</sup> Data includes the Weatherization Program and LIHEAP Wx.

<sup>viii</sup> Total includes beneficiaries that are not included in the race/ethnicity reporting for households that have moved out of THDA’s jurisdiction through portability. For these beneficiaries, the record is managed by another public housing authority, but THDA maintains payment responsibility, and the household is still counted in THDA’s beneficiary totals (as per DHUD requirements).

<sup>ix</sup> Includes demographic information for all household members. The total represents each unit/apartment and not every individual within an assisted household.

<sup>x</sup> Race/ethnicity reporting includes beneficiaries of HUD funded and other Housing Counseling activities conducted by reporting agencies.

<sup>xi</sup> Data is limited to Competitive Grants and CHI-2. Competitive grant data is limited to the beneficiaries occupying units placed in service in the most recent reporting period and does not include occupants of funded properties placed in service in prior reporting periods but that are still in an affordability period.

Appendices available upon request to Laura Swanson, Title VI Coordinator, [lswanson@thda.org](mailto:lswanson@thda.org).