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CHECKLIST FOR DOCUMENTATION OF  
 MONITORING OF COMMUNITY DEVELOPMENT PROGRAMS  
 GRANTEE PERFORMANCE OF FAIR HOUSING AND  
 EQUAL OPPORTUNITY REQUIREMENTS

Area Office records should include documentation of monitoring findings and factors reviewed and considered in examining a grantee's performance. There should be a record of monitoring conclusions, whether monitoring is based on a review of documentation, e.g., GPR in the CDBG program or QPR in the UDAG program or based on information gathered during a visit to the locality.

Recipient \_\_\_\_\_

Type of Grant: \_\_\_\_\_

Grant No.: \_\_\_\_\_

Type of Monitoring:	Date:
_____ On-Site Monitoring	_____
_____ Performance Report Review	_____
_____ Annual Assessment	_____

Name of Project (UDAG, 312, Homesteading): \_\_\_\_\_

HUD Evaluator(s): \_\_\_\_\_

Person(s) Interviewed: (Name, Title, Phone No.) \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

A. BACKGROUND DATA

1. POPULATION PROFILE

PERCENT

Total FHH\* White Black Hispanic Other Minority

Grantee                    100%    \_\_\_    \_\_\_    \_\_\_    \_\_\_    \_\_\_    \_\_\_

Project Areas  
Specify:

\_\_\_\_\_ 100%    \_\_\_    \_\_\_    \_\_\_    \_\_\_    \_\_\_    \_\_\_

\_\_\_\_\_ 100%    \_\_\_    \_\_\_    \_\_\_    \_\_\_    \_\_\_    \_\_\_

\_\_\_\_\_ 100%    \_\_\_    \_\_\_    \_\_\_    \_\_\_    \_\_\_    \_\_\_

\*Female-headed households

2. History of CDBG Program Participation. (Optional when monitoring CDBG program.)

\_\_\_\_\_ has received a total of \$ \_\_\_\_\_ in \_\_\_\_\_ years of CDBG-funding, including \$ \_\_\_\_\_ in the most recent program year. A total of \_\_\_\_\_ activities are currently being carried out. The majority of expenditures fall into the category(s) of activities as follows:

- (1) \_\_\_\_\_ (\$ \_\_\_\_\_)
- (2) \_\_\_\_\_ (\$ \_\_\_\_\_)
- (3) \_\_\_\_\_ (\$ \_\_\_\_\_)
- (4) \_\_\_\_\_ (\$ \_\_\_\_\_)
- (5) \_\_\_\_\_ (\$ \_\_\_\_\_)

3. History of Program Participation: (Complete when monitoring UDAG, Section 312, or Urban Homesteading projects.)

\_\_\_\_\_ has received a total of \$ \_\_\_\_\_ for \_\_\_\_\_ (number) of project. The project subject to monitoring is a \_\_\_\_\_ neighborhood/\_\_\_\_ commercial/industrial project and is located \_\_\_ inside/\_\_\_ outside an area of minority concentration. The project developer is \_\_\_\_\_.

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B. FAIR HOUSING (Title VIII, E.O. 11063, Section 570.307(1), (2))

1. Location of Assisted Housing (From GPR, A.O. Records).

Has the location of assisted housing contributed to the spatial deconcentration of housing opportunities outside areas of minority concentration? (Focus on actions occurring during program year) \_\_\_\_\_

Neighborhood

	Total No.	Within Minority Concentration	Outside Minority Concentration
Assisted Units			
Committed Units			
Elderly			
Family/Large Family			
New Construction			
Substantial Rehab.			
Section 8 Existing (M/R)*			
Rehab. Loans/Grants			
Occupied Units			
Elderly			
Family/Large Family			
New Construction			
Substantial Rehab.			
Section 8 Existing (M/R)*			
Rehab. Loans/Grants			
*Including Moderate Rehabilitation Program			
Comments: _____			

2. What actions have been taken by the grantee to affirmatively further fair housing specifically for lower-income households (refer to GPR and on-site monitoring notes). Acceptable actions must be specific and substantive. Include any related activities undertaken in accordance with the housing opportunities strategy.

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3. What actions have to be taken to promote fair housing at all income levels?

4. What other actions, if any, have been taken by the grantee specifically to administer all activities and programs relating to housing and community development in a manner to affirmatively further fair housing?

5. Recommendations to achieve or improve performance:

C. GRANTEE PERFORMANCE IN PROVIDING BENEFITS TO MINORITIES AND FEMALE-HEADED HOUSEHOLDS THROUGH COMMUNITY DEVELOPMENT AND HOUSING ACTIVITIES.

1. What process is used to identify special needs and problems of minorities and women?

2. Are minorities and women adequately represented on the policy-making bodies and Advisory Committees? In what specific areas are minorities and women represented?

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3. List projects and activities undertaken to address any special needs of women and minorities.

4. Degree to which assisted housing opportunities have been utilized by minority and female-headed households (from GPR) during the past program year. Indicate below the percentage of need and assistance for minority and female-headed households.

HOUSING ASSISTANCE PROVIDED BY HOUSEHOLD TYPE FOR MINORITY AND FEMALE HEADED HOUSEHOLDS

SHARE OF ASSISTANCE

HOUSEHOLD TYPE	MINORITY		FEMALE HEAD OF HOUSEHOLD	
	PERCENT MINORITY NEED	PERCENT MINORITY SHARE	PERCENT FHH NEED	PERCENT FHH SHARE
Elderly				
Family				

Large  
Family

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Total

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5. Describe the extent to which minorities and women are benefiting from activities, other than housing assistance. (Explain response)
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- a. To what extent do minorities within the project area receive benefits? (Explain response)
- b. To what extent is program progress being made in project areas which can be characterized as non-minority, compared with program progress in project areas which are largely minority? Comparison of project areas with different racial/ethnic minority identification? (Explain response)
6. Does the grantee keep records on the racial, ethnic and gender characteristics of program beneficiaries as required by 570.907? Indicate records reviewed.
7. Briefly indicate findings from site visits made to projects or facilities intended to benefit low-income persons, minorities and/or females.
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8. Are any programs being administered in a manner which tends to limit the number of minority or women beneficiaries or the level of benefits to minorities or women? For each category of activities, briefly state how method of administration facilitates or hinders participation of handicapped persons?
9. Recommendations to achieve or improve conformance with Title VI and Section 109.

D. RECIPIENT EMPLOYMENT (SECTION 4(a) OF GRANTEE AGREEMENT AND SECTION 109 OF HCD ACT OF 1974)

1. Indicate the degree to which the percent of minorities and women employed by the recipient (i.e., in each department receiving and administering CDBG funds including administrative, legal and operating departments as well as separate agencies) reflects the percent of minorities and women in the employment market area or the total population of the recipient jurisdiction.

	Minorities (%)	Women (%)
Employment market area	_____	_____
Total population	_____	_____
Workforce	_____	_____
Administering agencies	_____	_____

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2. Are minorities appropriately represented as permanent full-time employees in all agencies administering Community Development funds? Explain response.
3. Are women appropriately represented as permanent full-time employees in all agencies administering Community Development funds? Explain response.
4. Are minorities appropriately reflected at lower, middle and upper salary levels within administrative units? \_\_\_\_\_  
Specify agencies examined and explain response.
5. Are women appropriately reflected at lower, middle and upper salary levels within administrative units? \_\_\_\_\_  
Specify agencies examined and explain response.
6. What actions has the grantee taken to expand job opportunities for minorities and women (e.g., development of Affirmative Action Plan, recruitment outreach, new hires, promotions)? Are those actions recorded as required by 570.907(f)(3)?

7. Are Equal Employment posters displayed in conspicuous places?
  8. Do vacancy announcements and advertisements state that "all qualified applicants will receive consideration for employment without regard to race, color, religion, sex or national origin?"
  9. Recommendations for achieving or improving conformance with Section 4(a).
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E. ECONOMIC DEVELOPMENT

Employment in Nonconstruction and Small (\$10,000 or Less) Construction Activities.

1. Do contracts for program work (nonconstruction) contain the EEO requirements reflected in Section 4(a) of the CDBG grant agreement? (Look at purchase orders, service contracts, etc.)
  2. Employment of Project Area Residents and Utilization of Project Area Businesses, Section 3 of HUD Act of 1968.
    - a. Does the grantee have an acceptable Section 3 Affirmative Action Plan for the utilization of project area businesses?
    - b. Do HUD-assisted contract bid packages contain required Section 3 materials, i.e., Section 3 clause, requirement that the bidder submit a plan to utilize project area businesses, and notification of a preliminary statement of workforce needs by successful bidder? (Review bids and contracts. List records examined.)
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- c. How does the grantee notify Section 3 eligible businesses of the opportunity to bid and what have been the results of this special notification?
- d. Are Section 3 requirements discussed at preconstruction conferences?
- e. How does the grantee monitor implementation of Section 3 by contractors and subcontractors?
- f. What percentage of CDBG-funded contracts were let to Section 3 eligible firms? How many Section 3 lower-income residents were employed?

	Total	Section 3 Eligible
Contracts	\$ _____	\$ _____
Employees	# _____	# _____

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- g. Does the grantee employ and/or train Section 3 eligible residents?
  - h. Conclusion and Recommendations for Actions to Achieve or Improve Conformance with Section 3 and Related Regulations.
3. Utilization of Minority Businesses, OMB Circular A-102, 570.307(1), Executive Order 11625.
- a. Describe procedure used to encourage and utilize minority businesses as sources of supplies, equipment, construction and services?

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- b. Recommendation for actions to achieve or improve utilization of minority owned businesses.

4. Utilization of Minority and Women-Owned or Controlled Financial Institutions.

Are any grantee funds deposited in minority/women-owned or controlled financial institutions?

5. Minority Equity.

Is there evidence of minority equity participation in the projects? If yes, elaborate.

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F. RELOCATION

1. Have relocation activities been carried out in a manner which promotes fair housing, by providing displacees with maximum choice of replacement housing in the community's total housing supply regardless of race, color, religion, national origin or sex?

2. Have relocation services and benefits to displaced persons and businesses been provided in a manner to ensure that the relocation process, for example payments provided, does not result in different or separate treatment on account of race, color, national origin or sex?

a. To what extent are minorities and women affected by displacement activities?

	Displaced Households	Displaced Businesses
Total	_____	_____
Minority	_____	_____
Female	_____	_____

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G. COMPLIANCE AND LEGAL ACTIONS

1. Are there any outstanding complaints pending before the Regional Office of FHEO? If yes, explain.
2. Has the grantee been subject to a compliance review during the most recent year? If yes, summarize compliance findings.
3. Is there any litigation pending or in court connected with this grant? If yes, summarize major issues/allegations and give status.

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H. ADMINISTRATIVE COMPLAINTS

1. Are there any outstanding administrative complaints in the Area Office which contain fair housing and equal opportunity issues? If yes, summarize complaint and status of resolution.

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