

CHAPTER 4. PREPARATION FOR TITLE VI COMPLIANCE REVIEWS
AND COMPLAINT INVESTIGATIONS (FIELD VISITS)

13. PURPOSE. Efficient investigation requires advance planning and use of information resources readily available in either Central, Regional, or Area Offices of HUD or other Federal agencies. Adequate preparation must be made before the review or investigation of Title VI matters.
14. PREPARATION. The preliminary preparation for a compliance review and a complaint investigation are the same. The preparation includes:
 - a. Knowledge of Program, Issues, and/or Allegations. The success of every fact-finding mission is dependent upon intelligent and careful preparation. The investigator must be well acquainted with all background data hearing on the issues and allegations, and be particularly knowledgeable of the present and past operation of the program or activity which is to be reviewed, including the regulations and requirements governing the operation of that program. Investigators who are thoroughly familiar with all available data relating to the case, will be able to develop an orderly plan for conducting the investigation, to prepare clear concise questions to be asked of each witness (avoiding questions which elicit simple "yes" or "no" answers), and to draw forth more effectively the information needed.
 - b. Investigator's Worksheet. A Title VI Investigator's Worksheet (see Appendix 4.2 for form) should be prepared before the investigator(s) goes into the field. The worksheet will help the investigator to focus on relevant issues: reduce the potential for inadvertent gaps in the investigation; facilitate the isolation of issues or factors bearing on the allegations) in a complaint; isolate program areas which may need in-depth FHEO reviews during the course of the field visit; and make for better discussion between the investigator and the Director of Compliance prior to the field visit. Most of the information needed to complete the worksheet can be obtained through consultation with appropriate Area Office staff.
 - c. Letter of Introduction. The ARA/FHEO shall send a letter to the respondent agency announcing the forthcoming compliance review (see Appendix 3.4(a) for form letter) or complaint investigation (see Appendix 3.5 for form letter). The letter should introduce the investigator(s) assigned to handle the case, set a date and time for the visit, and be

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- at least five to ten working days before the scheduled visit. If the field visit is to review or investigate a concomitant Title VI and Section 109 (HCDA, 1974) matter, the chief executive officer of the community or unit of general local government involved shall also be sent a letter announcing the forthcoming field visit. A courtesy copy of all letters should be sent to the appropriate Area Office Director.
- d. Confirmation of Visit. The Director of Compliance should contact the director of the respondent agency to confirm the time and date of the scheduled field visit (by the investigators) and, if a complaint is involved, notify the complainant of the impending visit (see Appendix 3.9 for form letter). A courtesy copy of the letter confirming the scheduled visit should be sent to AS/FHEO, Program ARA and Area Director.
- e. Rescheduled Field Visits. If it becomes necessary to reschedule a field visit, the visit should be rescheduled within ten days from the planned date of the initial field visit. This date is important since HUD Area FHEO staffs have tight time periods for review of applications for many programs. Failure to investigate on a timely basis complaints of substantial magnitude could cause embarrassment to the Department in the event it becomes necessary to terminate, reduce, or refuse to grant HUD funds awarded to a recipient which was not in compliance with Title VI at the time its application was initially acted upon.