

DCED – Center for Compliance, Monitoring and Training
**FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
 MONITORING GUIDELINES**

Grantee Name:	Program Year:	<input type="checkbox"/> CDBG	<input type="checkbox"/> CDBG-DR	<input type="checkbox"/> HOME	<input type="checkbox"/> ESG
Grantee Staff Consulted & Contact Information:					
Name(s) of Reviewer(s):		Date of Review:			

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, DCED must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the Grantee’s plan, policies, and/or procedures more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding**."

Instructions:

I. CDBG - EQUAL OPPORTUNITY AND FAIR HOUSING REVIEW CRITERIA.

The rules at 24 CFR 91.520(a) set criteria for DCED to review recipient performance with respect to nondiscrimination and equal opportunity requirements in four areas: (1) carrying out the CDBG-funded program in accordance with civil rights certifications and civil rights requirements of the Housing and Community Development Act relating to equal employment opportunity, equal opportunity in services, benefits, and participation, and in affirmatively furthering fair housing; (2) compliance with Title VI of the Civil Rights Act and Section 109 of the Housing and Community Development Act; (3) compliance with the Fair Housing Act and the obligation to affirmatively further fair housing; and (4) performance with respect to the use of minority and women’s business enterprises as described in Executive Orders 11625, 12432, and 12138. With respect to performance in accordance with civil rights certifications and civil rights requirements under the Housing and Community Development Act, DCED will presume compliance unless there is evidence that shows, or from which it is reasonable to infer, that the recipient, motivated by considerations of race, color, religion where applicable, sex, national origin, age or handicap (disability) has treated some persons less favorably than others; there is evidence that a policy, practice, standard or method of administration, although neutral on its face, operates to deny or affect adversely in a significant way the provision of employment or services, benefits or participation to persons of a particular race, color, religion where applicable, sex, national origin, age or handicap or fair housing to persons of a particular race, color, religion, sex, or national origin; or the recipient has failed to meet any further assurance in order for DCED to accept the recipient’s prior civil rights certification. Failure to maintain records is an indication of noncompliance with the CDBG regulations governing record keeping. While a lack of documentation may not imply discrimination the Grantee’s data are a basis for further investigating compliance with nondiscrimination requirements. Please note that due to the Pennsylvania Human Relations Act of 1955, P.L. 744, No. 222, as amended June 25, 1997 by Act 34 of 1997, 43 P.S. §§ 951-963, the additional protected classes of age and ancestry are added to this compliance.

DCED – Center for Compliance, Monitoring and Training
FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
MONITORING GUIDELINES

This Exhibit is designed to review the State Community Development Block Grant (CDBG) program participant's records on the civil rights-related program requirements (CRRPRs) of the program, including records pertaining to its civil rights-related certifications and the State's oversight of its units of local government's compliance with CRRPRs. Failure to maintain records is an indication of noncompliance with the State CDBG regulations governing record keeping. While a lack of documentation may not imply discrimination because the State's or unit of local government's data are a basis for further investigating compliance with nondiscrimination requirements, it may be an indication of a lack of capacity to administer the CDBG program in accordance with the regulations and affect future funding.

II. HOME - EQUAL OPPORTUNITY AND FAIR HOUSING REVIEW CRITERIA

The rules at 24 CFR 92.509(b) set criteria for DCED to review recipient performance with respect to nondiscrimination and equal opportunity requirements in four areas: (1) carrying out the HOME-funded program in accordance with civil rights certifications and civil rights requirements of the Housing and Community Development Act relating to equal employment opportunity, equal opportunity in services, benefits, and participation, and in affirmatively furthering fair housing; (2) compliance with Title VI of the Civil Rights Act and Section 109 of the Housing and Community Development Act; (3) compliance with the Fair Housing Act and the obligation to affirmatively further fair housing; and (4) performance with respect to the use of minority and women's business enterprises as described in Executive Orders 11625, 12432, and 12138. With respect to performance in accordance with civil rights certifications and civil rights requirements under the Housing and Community Development Act, DCED will presume compliance unless there is evidence that shows, or from which it is reasonable to infer, that the recipient, motivated by considerations of race, color, religion where applicable, sex, national origin, age or handicap (disability) has treated some persons less favorably than others; there is evidence that a policy, practice, standard or method of administration, although neutral on its face, operates to deny or affect adversely in a significant way the provision of employment or services, benefits or participation to persons of a particular race, color, religion where applicable, sex, national origin, age or handicap or fair housing to persons of a particular race, color, religion, sex, or national origin; or the recipient has failed to meet any further assurance in order for DCED to accept the recipient's prior civil rights certification. Failure to maintain records is an indication of noncompliance with the HOME regulations governing record keeping. While a lack of documentation may not imply discrimination the Grantee's data are a basis for further investigating compliance with nondiscrimination requirements. Please note that due to the Pennsylvania Human Relations Act, the additional protected classes of age and ancestry are added to this compliance.

These Guidelines are designed to monitor a HOME grantee's compliance with civil rights-related record keeping and data compilation requirements. Failure to maintain records is an indication of noncompliance with the record keeping regulations. While a lack of documentation may not imply discrimination because the grantee's data are a basis for further investigating compliance with nondiscrimination requirements, it may be an indication of a lack of capacity to administer the HOME program in accordance with the regulations and affect future funding.

III. EMERGENCY SOLUTIONS GRANT (ESG) – EQUAL OPPORTUNITY AND FAIR HOUSING REVIEW CRITERIA

This Exhibit is designed to evaluate the Emergency Solutions Grants (ESG) grantee's compliance with record keeping requirements pertaining to: conversions and major rehabilitation undertaken to make assisted shelters accessible to persons with disabilities, when required because the cost of

DCED – Center for Compliance, Monitoring and Training
FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
MONITORING GUIDELINES

conversion and/or rehabilitation exceeds 75% of the replacement cost of the building after conversion [pursuant to CFR 8.23(a)]; accessibility of programs and assistance to the protected classes in the area of rapid rehousing and homelessness prevention; administration of the program in conformity with the nondiscrimination and equal opportunity requirements found at 24 CFR Part 5 and 24 CFR 576.57(a); and additional procedures for making persons with disabilities aware of the facilities and services offered by the participant and the locations of such facilities and services.

These Guidelines are designed to monitor an ESG grantee's compliance with civil rights-related record keeping and data compilation requirements. Failure to maintain records is an indication of noncompliance with the regulations governing record keeping. While a lack of documentation may not imply discrimination, because the grant recipient's data are a basis for further investigating compliance with nondiscrimination requirements, it may be an indication of a lack of capacity to administer the ESG program in accordance with the regulations and affect future funding.

Questions:

DRAFT

DCED – Center for Compliance, Monitoring and Training
FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
MONITORING GUIDELINES

I. OVERALL ADMINISTRATION OF GRANTEE IN TERMS OF FHEO (ALL PROGRAMS)

RECORDKEEPING

a. Does the Grantee maintain a complete record of all FHEO compliance matters and provide adequate documentation.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Where to find: Grantee FHEO Record	Comments:
Verified by the Grantee FHEO records submitted and reviewed on (date).		Comments:		

ANNUAL REPORTING

CDBG – 24 CFR 570.904
HOME - 24 CFR 92.509(b)
ESG- 24 CFR 576.500

a. Has the Grantee annually completed a; DCED – CMT 160 – Fair Housing Report (since 2012) DCED – CMT 169 - Equal Employment Opportunity (since 2015) DCED – CMT 179 – Applicant Data for Direct Benefit Activities And Semi-Annually: DCED – CMT-4710 – Labor Standards Enforcement Report	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Federal Electronic Tracking System (FETS)	Comments:
List all the years records are available in FETS: CMT -160 CMT-169 CMT-179 CMT-4710				

DCED – Center for Compliance, Monitoring and Training
FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
MONITORING GUIDELINES

Verify by the Grantee FHEO records.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Grantee FHEO Record	Comments:
Are the reports complete and contain enough documentation to determine if FHEO compliance has been met.	<input type="checkbox"/> Yes <input type="checkbox"/> No	CMT-160 CMT-169 CMT -179 CMT-4710	Comments:
If not, list which years and what documentation is missing. CMT-160: CMT-169: CMT-179: CMT-4710:			

AREA AND DIRECT BENEFIT ACTIVITIES

CDBG - 24 CFR 570.506(g)(2)
 HOME - 24 CFR 92.508(a)(7)(i)(A)
 ESG – 24 CFR 576.500 (s)

a. For the time period reviewed, did the program participant maintain data on the extent to which each racial and ethnic group and single-headed household (by gender of household head) applied for, participated in, or benefited from, any area and/or direct benefit programs or activities funded in whole or in part with federal funds?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Grantee FHEO Record	Comments:
--	--	----------------------------	-----------

DCED – Center for Compliance, Monitoring and Training
**FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
 MONITORING GUIDELINES**

<p>b. List all activities by program being reviewed and identify if it's an area benefit or direct benefit.</p> <p><u>CDBG:</u></p> <p><u>CDBG-DR:</u></p> <p><u>HOME:</u></p> <p><u>ESG:</u></p>	<p>Area Benefit</p>	<p>Direct Benefit</p>	<p>FETS Remember Modifications & Revisions</p>	<p>Comments:</p>	
<p>c. Do the activities on the CMT-179, “Applicant Data for Direct Benefit Activities?” match those listed above under the direct activities category?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	<p>CMT-179</p>	<p>Comments:</p>
<p>d. Do the number of beneficiaries on the CMT-179 “Applicant Data for Direct Benefit Activities?” match those listed in FETS?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	<p>CMT-179 FETS</p>	<p>Comments:</p>
<p>List activities that have substantially different (greater than a 10% difference, either less or more.) numbers.</p>	<p>Comments:</p>				
<p>e. Do the number of beneficiaries on Area Benefit activities in FETS match those listed in CMT-180 “Beneficiary Data for LMA Activities?”</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	<p>FETS IDIS Report</p>	<p>Comments:</p>

DCED – Center for Compliance, Monitoring and Training
**FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
 MONITORING GUIDELINES**

List activities that have substantially different (greater than a 10% difference, either less or more.) numbers.	Comments:
--	-----------

DISPLACEMENT AND RELOCATION

CDBG - 24 CFR 570.488
 HOME – 24 CFR 92.353
 ESG – 24 CFR 576.500 (t)

For the time period reviewed, did the grantee maintain records on households displaced by CDBG, HOME or ESG -funded activities, which included: (a) race and ethnicity; (b) gender and single heads of households; and (c) addresses and census tracts of the housing units to which each displaced household relocated?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	FETS Grantee FHEO Record		Comments:
For the time period reviewed, did the grantee’s records document that displaced persons were provided with advisory services which include their rights under the Fair Housing Act to: relocate to residences in areas of non-minority concentration at their option; and provide referrals for minority persons to comparable and suitable decent, safe, and sanitary replacement dwellings not located in areas of minority concentration?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Comments:		

SUBCONTRACTING

CDBG - 24 CFR 570.488
 HOME – 24 CFR 92.353
 ESG – 24 CFR 576.500 (v)

a. Do all subcontracts with sub-grantees, vendors, third party contractors, etc. contain language that conveys all Fair Housing and Civil Rights requirements to the additional party?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Sample of Subcontract agreements including “OBO”		Comments:
--	--	---------------------------------------	--	--	--	-----------

DCED – Center for Compliance, Monitoring and Training
**FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
 MONITORING GUIDELINES**

AFFIRMATIVE ACTION TO OVERCOME PRIOR DISCRIMINATION

a. Have the courts or HUD found that the Grantee or any of its subgrantees previously discriminated against persons on the grounds of any protected class in administering the CDBG, CDBG-DR, HOME, and/or ESG programs?	<input type="checkbox"/> Yes <input type="checkbox"/> No	HUD Docs. PHMC	Comments:
b. If the answer to “a” above is “yes,” does the Grantee have documentation of the affirmative action measures taken to overcome prior discrimination? [24 CFR 570.506(g)(7)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Grantee FHEO Record	Comments:
c. List documentation reviewed including date of document.			

II. EQUAL EMPLOYMENT, OPPORTUNITY AND ACCESS

EMPLOYMENT

a. Did the Grantee maintain data on employment for each of its CDBG-funded subrecipients in accordance with the required two categories (race and national origin) on CMT-169, “Equal Employment Opportunity?” [24 CFR 570.506(g)(3)]	<input type="checkbox"/> Yes <input type="checkbox"/> No	CMT-169	Comments:
b. Were any persons hired by the grantee during the period of review?	<input type="checkbox"/> Yes <input type="checkbox"/> No	CMT - 169	Comments:
If yes, request proof of publication of job advertisement and review for equal employment opportunity statement and/or discriminatory practices.	Comments:		

DCED – Center for Compliance, Monitoring and Training
**FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
 MONITORING GUIDELINES**

If yes, request hiring policy and review for any discriminatory practices.	Comments:		
c. Based on comparing the latest American Community Survey and the most recent CMT-169 percentages of race and gender, does the grantee have equal or similar figures (within 5%)	<input type="checkbox"/> Yes <input type="checkbox"/> No	ACS CMT - 169	Comments:
If yes, what are the figures: Race: Male: Female:	Comments:		
If no, how different are the figures? And ask for an explanation.	Comments:		
d. For the time period reviewed, did the program participant have documentation of actions undertaken to assure equal employment opportunity to all persons regardless of race, color, national origin, sex, familial status, disability, age, and ancestry for its federally-funded subrecipients? [24 CFR 570.506(g)(3)]	<input type="checkbox"/> Yes <input type="checkbox"/> No		List documents reviewed to assure equal employment opportunity:

OPPORTUNITY

CDBG Based on the Three Year Plan submitted with the application of the review period, are any areas of high concentration of minorities that need assistance, that aren't being addressed.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Review Period Application	Comments:
If yes, List the areas and activities:	Comments:		
Discuss with Grantee, their responsibility to make sure all areas of their jurisdiction is equally served if the assistance is required.	Comments:		

DCED – Center for Compliance, Monitoring and Training
FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
MONITORING GUIDELINES

ACCESS

<p>HOME - a. For the period reviewed, did the grantee maintain records of the implementation of its overall affirmative marketing strategy to market units to those least likely to apply without regard to race, color, national origin, sex, religion, familial status, disability, age, and ancestry, e.g., a written affirmative marketing strategy; records of actions taken by the grantee to affirmatively market units; and records to assess the results of these actions? 24 CFR 92.351(a)(1)(iv) and 24 CFR 92.508(a)(7)(ii)(A)</p>	<input type="checkbox"/> <input type="checkbox"/> Yes No	Affirmative Marketing Strategy	Comments:
<p>b. For the period reviewed, did the grantee maintain documentation of steps taken by participating owners to affirmatively market their units funded through the HOME program? 24 CFR 92.351(a)(1)(iv) and 24 CFR 92.508(a)(7)(ii)(A)</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A	Grantee Documentation	Comments:
<p>c. Does the grantee have written policies that require its sub-recipients to adopt affirmative marketing procedures and requirements? 24 CFR 92.351(a)(3)</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A	Contracts or Agreements with Sub-grantees, vendors, or developers.	Comments:

DCED – Center for Compliance, Monitoring and Training
FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
MONITORING GUIDELINES

<p>ESG a. Did the grantee and/or its subrecipients maintain records regarding the implementation of procedures intended to:</p> <p>1. Advertise the availability of facilities, programs, and services on a nondiscriminatory basis to all persons regardless of race, color, religion, sex, age, national origin, familial status, disability age and ancestry; and</p> <p>2. Make available to interested persons information concerning the availability and location of services, programs and facilities accessible to persons with disabilities? 24 CFR 576.407(b)</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>	<p>Program Advertisement or Notification</p>	<p>Comments:</p>
<p>ESG b. Is it likely that regular procedures for informing persons about the availability of the program’s facilities and services on a nondiscriminatory basis would reach persons regardless of race, color, religion, sex, national origin, familial status, disability, age, or ancestry? 24 CFR 576.407(b)</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>	<p>Grantees’ Affirmative Marketing Plan</p>	<p>Comments:</p>
<p>If “no,” did the grantee and/or its subrecipients establish other procedures that would more effectively increase awareness of these programs among persons regardless of race, color, religion, sex, national origin, familial status, disability, age, ancestry?</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>	<p>Other Procedures</p>	<p>Comments:</p>
<p>Discuss with Grantee, their responsibility to make sure all areas of their jurisdiction is equally served if the assistance is required.</p>	<p>Comments:</p>		

DCED – Center for Compliance, Monitoring and Training
FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
MONITORING GUIDELINES

III. ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

CDBG - 24 CFR 91.325(a)(1)
 HOME – 24 CFR 5.168

a. Has the grantee completed a different fair housing activity annually?	<input type="checkbox"/> Yes <input type="checkbox"/> No	CMT -160 Review the last complete years, plus four previous. (5)	Comments:
List all the FH activities in the last five years:			
Do the activities address an identified impediment to Fair Housing? List which impediments.	<input type="checkbox"/> Yes <input type="checkbox"/> No	AI List of Impediments	Comments:
b. Does the grantee identify the individual or third party agency in a Notice that is serving as their Fair Housing Officer? List name of FH Officer: Date of Publication:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Notice of Fair Housing Officer	Comments:
c. Did the grantee adopt a resolution furthering Fair Housing? Date of resolution: Date of Publication:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Resolution Furthering Fair Housing	Comments:
d. Has the grantee notified participants, beneficiaries, applicants, and employees of their policy of furthering Fair Housing? Use of the EHO symbol on correspondence, website, flyers, etc.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Notices, Advertisements, EHO signs.	Comments:



DCED – Center for Compliance, Monitoring and Training
FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
MONITORING GUIDELINES

e. Based on this review, is there evidence that raises questions about the accuracy of this Grantee’s certification to affirmatively further fair housing (AFFH)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Comments:
---	--	---------------------------------------	-----------

IV. LIMITED ENGLISH PROFICIENCY

CDBG - 24 CFR 570.506(g)(7)
HOME – 24 CFR 92.353
ESG – 24 CFR 576.407 (a)

a. Does the grantee have a written Citizen Participation Plan that includes the process to address notification of residents with limited English proficiency and disabilities of their yearly planning process for application submission and availability of services? If the answer is no, this is a finding.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Citizen Participation Plan	Comments:
b. If the answer to “a” above is “yes,” has the grantee completed a four- factor analysis regarding Limited English Proficiency for the application of the review period? If the answer is no, this is a finding.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Most Recent Application	Comments:
Did the grantee identify any factors that would require a LAP to be completed? Identify which factors: What municipalities have over 5% of their population that don’t speak English proficiently:.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Four Factor Analysis	Comments:

DCED – Center for Compliance, Monitoring and Training
**FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
 MONITORING GUIDELINES**

<p>c. If the answer to “b” above is “yes,” has the grantee completed a Language Access Plan (LAP)?</p> <p>What languages were identified for the grantee?</p> <p>If the answer is no, this is a finding.</p>	<p style="text-align: center;"><input type="checkbox"/> <input type="checkbox"/> Yes No</p>	<p>Language Access Plan</p>	<p>Comments:</p>
<p>Review all Notices, Publications, Application documents, and Intake for compliance to the LAP.</p>	<p>Comments:</p>		

V. SECTION 504

CDBG - 24 CFR 570.506(g)(7)
 HOME – 24 CFR 92.353
 ESG – 24 CFR 576.407 (a)

<p>a. Has the grantee notified participants, beneficiaries, applicants, and employees including those with impaired vision or hearing and that they do not discriminate on the basis of disability?</p>	<p style="text-align: center;"><input type="checkbox"/> <input type="checkbox"/> Yes No</p>	<p>Notices, Advertisements, Hiring Practices, EEO signs.</p>	<p>Comments:</p>
<p>b. Does the Grantee have 15 or more full or part-time employees?</p>	<p style="text-align: center;"><input type="checkbox"/> <input type="checkbox"/> Yes No</p>	<p>CMT-169</p>	<p>Comments:</p>
<p>If the answer to “b” above is “yes,” has the Grantee designated at least one person as the Section 504 Officer to coordinate 504 and related compliance efforts?</p> <p>Name of Section 504 Officer:</p>	<p style="text-align: center;"><input type="checkbox"/> <input type="checkbox"/> Yes No</p>	<p>Notice of Sec. 504 Officer and Grievance Procedures</p>	<p>Comments:</p>

DCED – Center for Compliance, Monitoring and Training
FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
MONITORING GUIDELINES

<p>If the answer to “b” above is “yes,” has the Grantee adopted grievance procedures incorporating due process standards and allowing local for prompt resolution of any complaints of discrimination based on disability?</p> <p>Date of Publication of Notice:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>Notice of Sec. 504 Officer and Grievance Procedures</p>	<p>Comments:</p>
<p>Has the grantee received any complaints from residents on discrimination based on disability since the last FHEO monitoring?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>Grantee Complaint File</p>	<p>Comments:</p>
<p>c. Does the grantee have a Section 504 Self Evaluation for all the;</p> <p>1. municipal owned facilities and practices:</p> <p>2. activities in the most recent awarded contract:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No	<p>Section 504 Self-Evaluation</p>	<p>Comments:</p>
<p>Is there a Transitional Plan in place for any item that does not meet the Section 504 standards?</p> <p>If the answer to the question above is yes, is the grantee timely with the remediation of non-compliant issues?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No	<p>Section 504 – Transitional Plan</p>	<p>Comments:</p>

DCED – Center for Compliance, Monitoring and Training
**FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
 MONITORING GUIDELINES**

VI. SECTION 3

CDBG – 24 CFR 570.506(g)(7)
 HOME – 24-CFR 135
 ESG -24 CFR 576.407(a)

<p>a. Does the Grantee receive more than \$200,000 in federal funding a year?</p> <p>Do they have any contracts in a given year that are more than \$100,000?</p> <p>If the answer to both of these is yes, does the grantee have a written Section 3 plan?</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/> Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>	<p>Contract award for the most current contract</p> <p>CMT-4710</p> <p>Section 3 Plan</p>	<p>Comments:</p>
<p>b. If the answer to “a” above is “yes,” does the plan include a strategy for promoting, training and employment opportunities for lower income residents?</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>	<p>Section 3 Plan</p>	<p>Comments:</p>
<p>c. Did the grantee document the use of any Section 3 businesses or the hiring of any Section 3 residents by either the contractor or the grantee themselves.</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>	<p>Contractor Self-Statement CMT-169</p>	<p>Comments:</p>

VII. MINORITY BUSINESS ENTERPRISES/WOMEN BUSINESS ENTERPRISES

CDBG - 24 CFR 570.506(g)(6)
 HOME – 24CFR 92.351
 ESG – 24 CFR 576.407(a)

<p>a. Does the grantee have a Minority & Women Business Enterprises Plan (MBE/WBE) that establishes goals and processes for encouraging eligible businesses to participate in contracting of federal programs.</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>	<p>MBE/WBE Plan</p>	<p>Comments:</p>
--	---	--	------------------

DCED – Center for Compliance, Monitoring and Training
FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
MONITORING GUIDELINES

<p>b. Did the Grantee have any projects or hire any contractors over \$25,000?</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>	<p>CMT-4710</p>	<p>Comments:</p>
<p>c. Did the Grantee follow their MBE/WBE Plan when advertising for bidders and/ or contractors?</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>	<p>MBE/WBE Plan</p>	<p>Comments:</p>
<p>Did the Grantee maintain documentation of affirmative steps to assure that minority business and women’s business enterprises had an equal opportunity to obtain or compete for contracts and subcontracts as sources of supplies, equipment, construction and services?</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>	<p>Grantee records</p>	<p>Comments:</p>
<p>Did the grantee have any MBE/WBE contracts awarded?</p> <p>What Percentage of all contracts awarded for the year?</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>	<p>Grantee records</p>	<p>Comments:</p>
<p>Did the grantee have a MBE/WBE Utilization form in their bid package?</p> <p>Did every bidder submit the form with the bid?</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>	<p>Grantee bid records (Choose 2 or 3 bids to sample)</p>	<p>Comments:</p>

DCED – Center for Compliance, Monitoring and Training
**FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
 MONITORING GUIDELINES**

<p>Did the Grantee have records showing:</p> <p>(a) The race and ethnicity of each business entity receiving a contract or subcontract of \$25,000 or more paid, or to be paid, with CDBG funds;</p> <p>(b) Data indicating which of these entities are women’s business enterprises as defined in Executive Order 12138; and</p> <p>(c) The amount of the contracts or subcontracts? [24 CFR 570.506(g)(6)]</p>	<p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> Yes No </p>	<p>Grantee Records</p>	<p>Comments:</p>
---	--	-----------------------------------	------------------

DRAFT