
CHAPTER 5. LIMITED FHEO REVIEW BY CPD REPRESENTATIVE

- 5-1. PURPOSE. This Chapter describes a limited review of a grantee's performance in carrying out the fair housing and equal opportunity requirements in the programs covered by this Handbook. At the discretion of the Area Manager, the CPD representatives may conduct a limited review of fair housing and equal opportunity requirements during a monitoring visit. A limited review by the CPD representatives would be conducted to identify major problems, if they exist.
- 5-2. LIMITED REVIEW OF BENEFITS TO MINORITIES AND WOMEN.
- a. Advising CPD of FHEO Concerns. The FHEO staff shall obtain a copy of the CPD monitoring schedule. Where CPD staff plans to visit localities which are not scheduled for a visit by FHEO staff, FHEO staff responsible for community development programs in those localities shall advise the appropriate CPD representative of any major FHEO concerns.
 - b. Monitoring Visit. During a monitoring visit, the CPD representative should review the grantee's records and files to assess performance regarding FHEO recordkeeping requirements and FHEO-related contract provisions as set forth in paragraphs 4-17 and 4-18 of this Handbook. The CPD representative should also examine any specific area which the FHEO staff has identified as a major concern (e.g., grantee employment, utilization of minority business enterprises).
- 5-3. LIMITED REVIEW OF BENEFITS TO HANDICAPPED PERSONS.
- a. Objectives. The objectives of the limited review are:
 - (1) To ensure that the grantee has the capacity to satisfy requirements relating to the handicapped; and
 - (2) To ensure that the grantee has complied with requirements relating to the handicapped.
 - b. Pre-Visit Preparation. Prior to the monitoring visit, the CPD representative should review the grantee's application and other pertinent documents including Grantee Performance Reports in the CDBG program, monitoring reports and citizen complaints to:

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- (5-3) (1) Review the needs of handicapped persons in the community, the actions proposed to meet those needs, and any other concerns which have been expressed by or on behalf of handicapped persons in the community; and
- (2) Review projects selected for monitoring with respect to:
- (a) Accessibility;
 - (b) Provision for participation by the handicapped in block grant funded activities; and/or
 - (c) Benefits to handicapped persons including employment opportunities.
- c. Monitoring Visit. During the monitoring visit, the CPD representative should review the grantee's records and files and, where appropriate, interview one or more members of the CD staff, members of community groups, public agencies or selected individuals to determine:
- (1) Whether and how the needs and concerns of handicapped persons that were identified in the application are being addressed;
 - (2) How the selected CDBG-funded projects or activities provide equal opportunity for participation by or benefits to handicapped persons in the community; and
 - (3) Whether appropriate accessibility design standards are being utilized. An inspection of sample specifications from the current ANSI standards may be made at the project site: Such ANSI standards provide, for example, that public walks should be at least 43 inches wide and should have a gradient not greater than 5 percent.
 - (4) If there are deficiencies in the grantee's performance with regard to accessibility by the handicapped, the CPD representative should review a larger sampling of projects and field check selected buildings or facilities which appear to be in violation of accessibility design standards.

who conducts the limited FHEO review shall discuss with FHEO staff all FHEO-related monitoring conclusions, appropriate corrective and remedial actions, if there are findings, and the need for technical assistance by FHEO staff. If the monitoring letter addresses FHEO matters, the CPD Division shall obtain the concurrence of the FHEO Director and provide FHEO Division with a copy of the monitoring letter.