

**Exhibit 5-U
Civil Rights Responsibilities Checklist**

CIVIL RIGHTS RESPONSIBILITIES CHECKLIST	
Dates(s)	1. <u>Civil Right requirements at project start-up (before CDBG approval of first draw)</u>
	Set up a CDBG Civil Rights file (Chapter 1, pages 1-17, 1-19).
	1a. Adopt a Fair Housing Resolution (Exhibit 5-M). Send a copy to CDBG. 1b. Display fair housing posters (Exhibit 5-N). 1c. Start actions to affirmatively further fair housing (pages 5-2, 5-14, 5-20, 5-21 and following).
	1d. Adopt Nondiscrimination (Equal Employment Opportunity/EEO) Policy Resolution (Exhibit 5-A). Send a copy to CDBG. 1e. Implement EEO policies.
	1f. Adopt ADA and Section 504 Complaint Resolution Procedures (Exhibit 5-R). Send a copy to CDBG. 1g. Designate an ADA/Section 504 compliance coordinator.
	1h. Conduct an ADA Self-Evaluation Inventory (pages 5-3, 5-24 and following). Send a copy to CDBG. 1i. Prepare an ADA Transition Plan for Handicapped Accessibility to Public Facilities (Exhibit 5-S). Send a copy to CDBG
	1j. Adopt a Hatch Act Resolution (Exhibit 5-Q). Send a copy to CDBG.
Date(s):	2. <u>Civil rights responsibilities after project start-up</u>
	2a. Maintain (in the project's Civil Rights file) documentation/records of project activities related to progress concerning on-going implementation of and follow-through on each of the responsibilities 1.a through 1.j (as listed above and explained in Chapter 5). See pages 5-32 and following regarding record-keeping requirements.
	2b. Publish Exhibit 5-B (sample <i>Section 3 Public Notice: Economic Opportunities for Low-Income and Very Low-Income Persons</i>) or its equivalent. See 5-10 and following.
	2c. Place the required appropriate contract language regarding civil rights in bid documents and in all contracts. See Chapter 3, <u>Procurement</u> and Exhibit 3-F.
	2d. Take all civil rights protection action necessary (and keep records of actions taken) during the entire course of your project -- to ensure that no one is discriminated against in receiving services and benefits from the CDBG project, especially persons in the protected groups (page 5-4).
	2e. If your project includes <u>direct benefits</u> to LMI individuals/households (rather than <u>area-wide</u> benefits): Gather and record the information that shows how your project meets requirements that are applicable to those CDBG projects with direct benefits to individuals: Keep records of direct beneficiaries by using Exhibit 5-D and Exhibit 5-E.
	2f. Complete Exhibit 5-J, <u>Contract Reporting Form</u>, at the time that each contract and subcontract exceeding \$10,000 is awarded (including contractors and subcontractors that are not minority owned).
	2g. Assure contractor affirmative action responsibilities concerning contracting with Disadvantaged Business Enterprises (pages 5-10 and 5-16 and following).