

**HUD-52510-A: Guidance for the On-site Limited Monitoring Review
of Civil Rights-Related Program Requirements (CRRPR)**



ATTACHMENT A
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OMB Approval No 577-0251
Exp. (05/31/2010)

Public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information collected will be used to evaluate PHAs' compliance with the Fair Housing laws. This agency may not collect this information, and you are not required to complete this form unless it displays a currently valid OMB control number.

U.S. Department of Housing and Urban Development

**OFFICE OF FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
AND
OFFICE OF PUBLIC AND INDIAN HOUSING (PIH)**

**GUIDANCE FOR THE ON-SITE LIMITED MONITORING REVIEW OF
CIVIL RIGHTS-RELATED PROGRAM REQUIREMENTS (CRRPR)
FOR
LOW-RENT PUBLIC HOUSING (LR) PROGRAM
AND
HOUSING CHOICE VOUCHER (HCV) PROGRAM**

1. The Office of Public and Indian Housing (PIH) must complete this review checklist in conjunction with a PIH scheduled on-site comprehensive/consolidated review that is planned based on the PIH risk analysis in accordance with the Management Plan Guidance. PIH should include the language in Attachment C – “Letter Template” – in the PHA notification letter. This checklist and any comments should be completed by PIH and forwarded to FHEO within ten (10) business days of PIH completing its on-site comprehensive/consolidated review. Please highlight those issues, which address or may have an effect on FHEO requirements. FHEO will then take appropriate action, if necessary.
2. PIH, prior to going on-site, should retrieve data from the appropriate HUD/PIH/FHEO data bases, e.g., Public Housing Information Center (PIC) System data on the racial and ethnic characteristics of Housing Choice Voucher holders by census tract, and data on the racial and ethnic composition of the PHA's Low-Rent Public Housing developments, including the location of scattered-site projects by census tract.
3. The PIH reviewer may make additional comments on a separate sheet of paper and attach it to this checklist. These comments should be identified clearly so that the response is associated with the appropriate question.
4. PIH should forward to local FHEO a copy of the completed checklists within ten (10) business days after completing the onsite comprehensive/consolidate review.

form HUD-52510-A (06/2007)



**ON-SITE LIMITED MONITORING REVIEW OF
CIVIL RIGHTS-RELATED PROGRAM REQUIREMENTS (CRRPR) FOR
LOW-RENT PUBLIC HOUSING (LR)
AND
HOUSING CHOICE VOUCHER (HCV) PROGRAM**

The Office of Public and Indian Housing (PIH) must complete this checklist when conducting its on-site comprehensive/consolidated review of a Public Housing Agency (PHA). These questions cover areas that PIH is expected to observe or data that PIH is expected to collect. This checklist is not intended to cover the full range of civil rights and fair housing concerns and PIH will not provide any evaluation or analysis of the data. This checklist alerts PIH and FHEO to certain PHA practices in the Low-Rent Public Housing (LR) and/or Housing Choice Voucher (HCV) Program(s) that may indicate noncompliance with civil rights and fair housing regulations. PIH should forward the completed checklist to local FHEO within ten (10) business days of PIH completing the on-site comprehensive/consolidated review, whether problems are noted or not.

PHA Name: _____

PHA Identification Number: _____

Location: _____

Indicate type PHA program, number of units and vouchers in each, as applicable:

LR Elderly _____ Number of Units _____ Number of Vouchers _____

LR Family _____ Number of Units _____ Number of Vouchers _____

HCV _____ Number of Units _____ Number of Vouchers _____

Reviewer's Name: _____

Reviewer's Title: _____

Reviewer's Telephone Number and Extension: _____

Date of Review: _____



PART I. POSTING OF DOCUMENT/MATERIAL REQUIREMENTS

Place an “x” in the appropriate column and provide comments whenever an explanation is warranted.

| Are the following displayed and readily visible or are they otherwise made available in accordance with the applicable regulations? | YES | NO | COMMENTS (if applicable) |
|--|------------|-----------|---------------------------------|
| 1. Equal Opportunity in Housing Poster (HUD 928.1-English/HUD 928.1A-Spanish) prominently displayed in all public areas. [24 CFR 110.15] | | | |
| 2. Is the Public Housing Agency Plan readily available for public review? [24 CFR 903] | | | |
| 3. Is the Administrative Plan available for public review. [24 CFR 982.54] | | | |
| 4. Notice that the PHA must give the family information on how to fill out and file a housing discrimination complaint. [24 CFR 982.54 (d)(6); 982.304]. | | | |
| 5. Are policies, rules, and regulations posted in the project office? [24 CFR 966.5]. | | | |



PART II. OTHER

| | YES | NO | COMMENTS (if applicable) |
|--|-----|----|-----------------------------|
| 1. Is there anything else that is related to civil rights or fair housing that should be noted? [For example, fair housing discrimination complaints brought against the PHA by its employees, or media reports of racial/ethnic tensions at the PHA's developments?] If yes , please note. | | | |
| 2. Limited English Proficiency (LEP). Executive Order 13166, titled "Improving Access to Services by Persons with Limited English Proficiency," requires all agencies and their recipients to ensure that their programs provide meaningful access for LEP persons. (Final Guidance will be published in Federal Register, and is also noted in the Public Housing Occupancy Guidebook, Section 6.2 "Accessibility and Plan Language," page 68.) | | | |
| Has the PHA taken the following steps to ensure meaningful access to programs by LEP persons? | | | |
| <ul style="list-style-type: none"> Conducted a four-factor analysis. If "yes," bring a copy to FHEO. | | | |
| <ul style="list-style-type: none"> Developed a written Language Assistance Plan? If "yes," bring a copy to FHEO. | | | |
| <ul style="list-style-type: none"> Hired bi-lingual staff. | | | |
| <ul style="list-style-type: none"> Contracted with a telephone language line services to provide interpretation for residents and applicants. | | | |

HUD-52510-B: On-site Limited Monitoring Review – Section 504



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ATTACHMENT B

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U.S. Department of Housing and Urban Development
OFFICE OF FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)
AND
OFFICE OF PUBLIC AND INDIAN HOUSING (PIH)

ON-SITE LIMITED MONITORING REVIEW -- SECTION 504

Public reporting burden for this collection of information is estimated to average 2 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information collected during the onsite comprehensive reviews of Public Housing Agencies (PHAs) will be used by HUD to evaluate the PHAs' compliance with civil rights and fair housing laws and regulations (Regulatory Authorities: 24 CFR 1.6(b); 24 CFR 8.55; 24 CFR 125). The information is subject to the confidentiality requirements of the HUD Reform Legislation. This agency may not collect this information, and you are not required to complete this form unless it displays a currently valid OMB control number.

This checklist is to be completed by the Public Housing Agency (PHA), collected by Public and Indian Housing (PIH) during the on-site program management review. PIH will forward the completed checklist to FHEO within ten (10) business days of completing the PIH on-site program management review. If the data is not available for the reviewer to bring to FHEO, the PHA must forward the completed checklist directly to FHEO within five (5) business days of the PIH exit interview. This checklist is not intended to cover the full range of civil rights and fair housing concerns and PIH will not give any evaluation or analysis of the data. This checklist serves as an alert to PIH and FHEO to certain PHA practices regarding Section 504. Results are to be referred to FHEO for possible follow-up.

PIH should forward Attachment B "On-Site Limited Monitoring Review Section 504 Monitoring" checklist to the PHA for completion prior to the PIH on-site program monitoring review. The PHA should be instructed that PIH will collect the completed checklist during the on-site management review. PIH will then forward this material to FHEO within the appropriate timeframe.

PHA Name: _____

PHA Identification Number: _____

Location: _____

Name of Person Completing Checklist:

Title of Person Completing Checklist:

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Telephone Number of Person Completing Checklist:

Date of Completion:

1.a. If the PHA has fifteen (15) or more staff members, please provide the name of the PHA Section 504 Coordinator:

1.b. If the PHA does not have a Section 504 Coordinator, identify the person who handles issues/questions regarding meeting the needs of persons with disabilities.

These questions are directed to the person named in answer to Questions 1.a. or 1.b. If no one was named, the person in the PHA with the most knowledge concerning persons with disabilities should respond to these questions and that name should be indicated.

2. How many dwelling units has the PHA designated UFAS-accessible (i.e., comply with the Uniform Federal Accessibility Standards)? NOTE: An “accessible housing unit” is a dwelling unit that is designed, constructed, altered, or adapted to comply with UFAS and is located on an “accessible route.”

3. What is the distribution by bedroom size of the accessible dwelling units?

| Bedroom size | TOTAL units | Number of UFAS-accessible units | Number of Units Accessible for hearing/visual impaired people |
|-----------------|-------------|---------------------------------|---|
| 1 bedroom | | | |
| 2 bedroom | | | |
| 3 bedroom | | | |
| 4 bedroom | | | |
| Other (specify) | | | |
| TOTALS | | | |

4. How are requests from applicants or residents asking for a reasonable accommodation handled, if the PHA does not have a policy?



ATTACHMENT B

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5. When is the reasonable accommodation policy given to an applicant?

6. When is the reasonable accommodation policy given to present tenants?

7. Where there is no policy addressing assistance animals, how are applicants' or tenants' requests to have such animals handled?

8. Is the tenant/applicant required to make a special deposit to have an assistance animal?

9. Does the PHA have the required TTY/TDD or other equally effective telecommunications system? _____ Yes _____ No

10. What is the TTY/TDD number?

11. How does the PHA staff communicate with persons who have hearing, speech, and/or visual impairments? Identify the system used by the PHA.

- _____ TTY/TDD
- _____ Interpreter
- _____ Relay system
- _____ Large print materials
- _____ Braille
- _____ Other (Specify) _____

12. Does the PHA's letterhead list:

_____ direct TTY number, provide number: _____ or
_____ relay telephone service number, provide number: _____



ATTACHMENT B

13. What reasonable accommodation assistance does the PHA provide for persons seeking Housing Choice Voucher (formerly Section 8) housing?

- Extension of time to find housing
- Exception to fair market rent
- Transportation
- Other (Specify) _____

14. How many times in the last year has the PHA granted a fair market rent exception for persons with disabilities needing accessible features?

15. Has a fair market rent exception ever been granted? _____

When? _____

16. Has a fair market rent exception ever been denied? _____

When? _____

17. What other rules or policies has the PHA implemented that affect persons with disabilities? (Identify.)

As the duly authorized representative of the PHA, I certify to the best of my knowledge and belief that the information presented on this checklist is true and accurate.

Signature of Authorized Official

Name Printed

Title of Authorized Official

Date (mm/dd/yy)