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|  | **CIVIL RIGHTS RESPONSIBILITIES CHECKLIST** |
| **Date** **Completed** | **A. *Civil Right requirements at project start-up (before TxCDBG approval of first draw)*** |
|  | **1. Set up a local CDBG Civil Rights file** (Chapter 1 and Chapter 10) |
|  | **2. Designate a Civil Rights Officer (CRO)** * This person is responsible for ensuring all requirements in Chapter 10 (Implementation Manual) met;
* enter name in TDA-GO, Grant Overview page
 |
|  | **3a. (if applicable) Adopt any Civil Rights Policies not currently in effect:*** Citizen Participation Plan and Complaint Procedures;
* Excessive Force Policy (A1003);
* Section 504 Policy and Grievance Procedures (if ≥15 employees) (A1004);
* Fair Housing Policy (A1015); and
* Code of Conduct (Form A1002-22).
 |
|  | **3b. Pass Resolution to affirm the Civil Rights Policies listed above are effective for the Grant Recipient (Form A1014).****This mandatory resolution must also affirm the Grant Recipient’s commitment to project specific Civil Rights Requirements:** * Section 3 economic opportunity;
* Limited English Proficiency information; and
* Activity to Affirmatively Further Fair Housing (AFFH).

*Note: Adopting new policies and re-affirming existing policies can be completed in the same resolution. All required resolutions, ordinances and/or policies regarding civil rights, equal opportunity, and citizen participation must be in effect throughout the TxCDBG grant agreement period.* |
|  | **4. Publish Citizen Participation and Civil Rights Notices in** * local newspaper supported by advertisement / tear sheet or publisher’s affidavit;
* courthouse/city hall & target area, supported by affidavit; or,
* courthouse/city hall & Grant Recipient’s website, supported by affidavit.
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|  | **5a. (if not previously completed) Upload the following policies to Gant Recipient’s Organization Profile in TDA-GO. The Organizational Details page will store these policies as a reference for all TxCDBG grants:*** Citizen Participation Plan and Citizen Complaint Procedures (A1013);
* Excessive Force Policy (A1003);
* Section 504 Policy and Grievance Procedures (if ≥15 employees) (A1004);
* Section 504 Self-Evaluation Review (Form A1006)
* Fair Housing Policy (A1015); and
* Code of Conduct (Form A1002-22).
 |
|  | **5b. Upload and/or enter required information in TDA-GO that is specific to the grant agreement.** **Upload and/or enter required information to the Group A Performance Report:*** Civil Rights Resolution (Form A1014) identifying the Grant Agreement Number;
* Published Civil Rights notices including Section 504 Non-Discrimination Policy and availability of Citizen Complaint Procedure notices (A1005);
* Documentation of AFFH activity (in addition to the adopted Fair Housing Policy).
* Section 3 map; and
* Limited English Proficiency plan (information entered in the Performance Report, not an uploaded document).

**Upload to the Group B Performance Report:*** Section 3 presentation to local governing body
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|  | **B*. Civil Rights Requirements after project start-up*** |
|  | **7. Take affirmative steps assisting SBE’s, MBE’s, and WBE’s*** Including these businesses on solicitation lists and soliciting them for RFPs and RFQs.
* Publicize the contracting opportunity through HUD’s Section 3 Opportunity Portal, appropriate plan rooms or similar organizations, and the TDA-GO Materials and Services Report.
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|  | **8. Include language in contracts:** * EO Clause, if construction >$10K;
* Section 3 Clause.
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|  | **9.**  **Take all civil rights protection action necessary (and keep records of actions taken) during the entire course of your project**  |
|  | **10. Perform at least one AFFH activity. If opting to pass resolution/ordinance/proclamation, the Grant Recipient must perform one more activity. See manual for possible activities.** |
|  | **11. Report and Maintain Documentation on the following:** |
|  | * Written citizen participation plan
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|  | * + Detail of Beneficiaries
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|  | * + Any and all handbooks, policies and procedures manuals, and resolutions or ordinances regarding employment, personnel policy, citizen participation and grievance policies, and civil rights.
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|  | * + Provide any advertisement for employment and documentation regarding the subsequent applicants and individuals hired. Use “Equal Employment Opportunity Employer” language.
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|  | * + If contractor must comply with Sec.3, then details of Sec. 3 compliance and Certification of Compliance (found in contract).
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|  | * + Resolution(s)/proclamations/ordinances or policies passed
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|  | * + If Grant Recipient has more than 15 employees, written grievance procedures regarding Section 504.
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|  | * + Newspaper advertisement/public posting affidavit
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|  | * + AFFH plan and all records showing evidence of AFFH activities
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|  | * + Section 504 Self-Evaluation Review (A1006)
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|  | * All records related to LEP. If LEP beneficiaries, translate vital documents as required including environmental notices, citizen participation notices, and civil rights notices.
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