

EXHIBIT V-A

RECORDKEEPING REQUIREMENTS - CIVIL RIGHTS

- Documentation of the action(s) the recipient has carried out (or is carrying out) to **affirmatively further fair housing**, including records on funds provided, if any, for such actions.
- For **direct benefit activities**, (e.g., housing rehabilitation/alternative relocation, job creation, etc.), data on the extent to which persons have participated in or benefited from any program or activity funded in whole or in part with CDBG funds. Records must be kept by race, ethnicity, disability status, and gender of heads of households **FOR ALL APPLICANTS FOR AND BENEFICIARIES OF PROJECT**. For **area-wide benefit activities** (e.g., central water treatment facilities), documentation must be kept on the area and the services being provided to the area, and the race and ethnicity of persons in the service area.
- Data on **employment** in each of the grantee/subgrantee's operating units carrying out an activity funded in whole or in part with CDBG funds. The data must be maintained according to professional category, race, ethnicity, handicapped status and head of household.
- Data indicating the **race and ethnicity of households and disability status** of persons **displaced** as a result of CDGB activities, including the address to which each displaced household is relocated. Where activities cause a significant level of displacement of businesses, data indicating the impact on businesses owned by minorities and women must be kept.
- Documentation of actions taken to meet the requirements of **Section 3** of the Housing and Urban Development Act of 1968.
- Data indicating the **racial/ethnic character of each business entity** that receives a **contract or subcontract of \$10,000 or more**, to be paid with CDBG funds. Data indicating which of those entities are women's business enterprises as defined in Executive Order 12138 and the amount of the contract or subcontract.
- Documentation of the **affirmative actions** the local government has taken **to overcome the effects of prior discrimination**, as determined through a formal compliance review or court proceeding, where the recipient has previously discriminated against persons on the ground of race, color, national origin, or sex in administering a program or activity funded in whole or in part with CDBG funds.
- Documentation of the **actions taken to meet the requirements of Section 504** of the Rehabilitation Act.