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**United States Department of Agriculture
Rural Development
Iowa State Office**

April #, 2011

<PROJECT CONTACT NAME>
<PROJECT NAME>
<OFFICE ADDRESS>
<CITY>, <ST> < ZIP>

Dear <PROJECT CONTACT NAME>:

Rural Development completed a Management Control Review of the Rural Rental Housing Programs for Fiscal Year 2010. This review randomly selected 515 Multi Family Housing financed projects across the United States. During this review deficiencies were found in facilities and corresponding case files. The deficiency to be addressed:

- Compliance with the Self-Evaluation and Transition Plan Requirements of Section 504 of the Rehabilitation Act of 1973, implemented by 7 CFR 15b.

As indicated in Chapter 3 of Handbook-2-3560, borrowers may become liable for fines and penalties imposed by enforcement agencies, loss of tax credits, or legal actions if found in noncompliance with civil rights laws. The Agency does not impose these fines and penalties, but will follow regulatory, supervisory, servicing procedures and loan eligibility requirements when noncompliance is found.

The following borrowers must conduct self-evaluations and develop transition plans:

- Borrowers of projects ready for occupancy on or before June 10, 1982.
- Borrowers of projects ready for occupancy after June 10, 1982, in noncompliance.

Self-Evaluations

In accordance with 7 CFR 15b, a record of the self-evaluation must be maintained for at least 3 years. The record must be made available for public inspection and be provided to the Agency upon request. The self evaluation record must contain:

- A list of the interested persons consulted;
- A description of areas examined and any problems identified; and
- A description of any modifications made and any remedial steps taken.

Transition Plans

At a minimum, transition plans must:

- Identify physical obstacles in the borrower's facilities that limit the accessibility of their property to disabled persons;
- Describe in detail the methods that would be used to make the facilities accessible;

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- Specify the schedule for taking the steps necessary to achieve full program accessibility and if the time period of the transition plan is longer than 1 year, identify steps that will be taken during each year of the transition period; and
- Identify the person responsible for implementation of the plan.

The following tools are attached. These are optional forms of documentation:

- Self-Evaluation Documentation
- Existing Property Accessibility Checklist (from Unnumbered Letter, Guidance on the CNA Process, January 7, 2011)
- Transition Plan Documentation

Free resources to assist in the process seem to be a rare and much sought after commodity. Here are some resources we have found. If you have others, please share them with us.

Amy Desenberg-Wines, Disability Consulting, LC & Great Plains ADA Center 515-981-4113
aw4113@earthlink.net

University of Missouri/Columbia
100 Corporate Lake Drive
Columbia, MO 65203
Telephone: Voice/TTY 573-882-3600, 800-949-4232, Fax: 573-884-4925

E&A Services Inc.
<http://www.accessea.com/index.htm>

The Iowa Department of Human Rights is still available to answer direct questions.

Department of Human Rights
Division of Persons with Disabilities
Lucas State Office Building
Des Moines, IA 50319
515-281-5969
DHR.Disabilities@iowa.gov

Please provide copies of the documentation completed. If not completed, please provide explanation.
All documentation should be sent to the Area Office serving the project to be received no later than July 31, 2011:

USDA, Rural Development
<OFFICE ADDRESS>
<OFFICE ADDRESS 2>
<CITY>, <STATE> <ZIP>

If you have any questions, please contact your local Area Office at <AREA OFFICE PHONE>. Thank you.

Sincerely,



WILLIAM J. MENNER
State Director