

GAO

Report to the Subcommittee on VA,
HUD, and Independent Agencies,
Committee on Appropriations, House of
Representatives

March 1997

FAIR HOUSING

Funding and Activities Under the Fair Housing Initiatives Program





United States
General Accounting Office
Washington, D.C. 20548

**Resources, Community, and
Economic Development Division**

B-276176

March 26, 1997

The Honorable Jerry A. Lewis
Chairman
The Honorable Louis Stokes
Ranking Minority Member
Subcommittee on VA, HUD,
and Independent Agencies
Committee on Appropriations
House of Representatives

Fair housing legislation was first enacted as part of the Civil Rights Act of 1968. Under the 1968 act, limited enforcement powers were available to the federal government, and, therefore, private entities played the primary role of enforcing the law. In 1988, the Fair Housing Initiatives Program was established to assist all parties in fighting housing discrimination. These included private nonprofit organizations such as civil rights organizations and local fair housing groups; public entities such as colleges and universities; and certain state and local fair housing agencies. The program funds activities designed to enforce fair housing laws and to inform the public about their rights and obligations under such laws. It has four initiatives or funding categories—private enforcement (for private nonprofit entities), the fair housing organizations initiative (for private nonprofit entities), education and outreach (for private and public entities), and administrative enforcement (for state and local agencies).

This report responds to your request that we review (1) how funds are allocated among the program's four initiatives or funding categories, what dollar amounts are made available under each category, and what level of demand exists for funds under each category and (2) who receives program funds and how the funds are being used. As requested, we are also providing background information on the program's history and the activities eligible for funding.

Results in Brief

From the program's inception through fiscal year 1997, the Congress has appropriated \$113 million to carry out the Fair Housing Initiatives Program. The Assistant Secretary for Fair Housing and Equal Opportunity, the Department of Housing and Urban Development, judgmentally determines how funds are allocated among the four initiatives on the basis of the program legislation, the administration's and the agency's priorities, and input from the housing industry and fair housing groups. The agency's

budget requests to the Congress set forth how it plans to divide the total program dollars among the four initiatives. The largest portion—more than \$40 million—has been budgeted and made available for the private enforcement initiative. As measured by the amounts requested on applications, for the 3 most recent years—fiscal years 1994 through 1996—there is also great demand for the private enforcement initiative.

Through fiscal year 1996, 220 different organizations in 44 states and the District of Columbia received program grants. Of all the funds awarded, 26 organizations received about half. The largest portion of funds—about \$41 million—was spent on the private enforcement initiative for activities aimed at determining the existence of discrimination in renting, sales, and lending—primarily testing¹ to investigate individual complaints and testing to investigate industry practices. Grantees have used funds for a variety of other fair housing activities, such as litigation; new fair housing organizations and capacity building for existing organizations; pamphlets and brochures; print, television, and radio advertisements; and conferences and seminars for housing industry professionals. Other funded activities also have included special projects on mortgage lending and insurance redlining.

Background on the Fair Housing Initiatives Program's History, Funding, and Activities

The Fair Housing Act, title VIII of the Civil Rights Act of 1968, prohibited discrimination in the sale, rental, and financing of housing based on race, color, religion, or national origin.² The act allowed the Department of Housing and Urban Development (HUD) to investigate and conciliate complaints of housing discrimination and authorized the Department of Justice to file suits in cases of a pattern or practice of discrimination or in cases of public importance. HUD was not given any authority to administratively remedy acts of discrimination against an individual, however.

The Fair Housing Act also required HUD to refer housing discrimination complaints to state and local agencies where the state or local law provided rights and remedies substantially equivalent to those provided by the federal law. In 1980, HUD established the Fair Housing Assistance Program to provide financial assistance to state and local agencies to

¹Testing programs involve the use of “testers” posing as renters, purchasers, or borrowers in order to ascertain if a similarly situated member of a protected class (based, e.g., on race, national origin, or gender) has been subject to discrimination.

²In subsequent legislation, the Congress also prohibited discrimination on the basis of gender, disability, and familial status.

encourage them to assume a greater share of the enforcement of their fair housing laws.

The Fair Housing Initiatives Program (FHIP), administered by HUD, is designed to provide a coordinated and comprehensive approach to fair housing activities in order to strengthen enforcement of the Fair Housing Act. During the 1986 Senate hearings on its proposal to establish the FHIP, HUD testified that enforcement activity, particularly testing, by private nonprofit and other private entities would be the principal focus and motivation of the program. In February 1988, the program was created as a 2-year demonstration program by the Housing and Community Development Act of 1987.

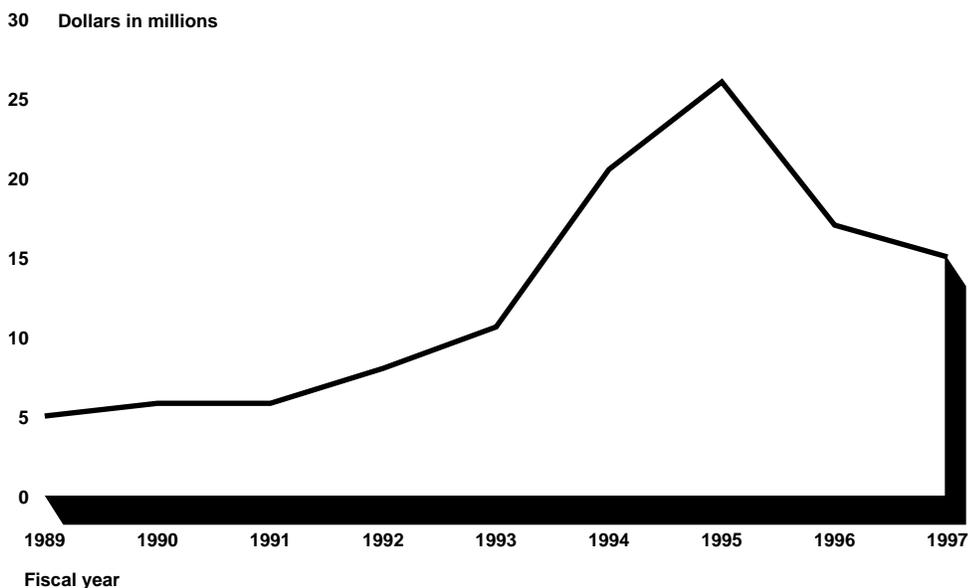
About 7 months later, the Fair Housing Amendments Act of 1988 was signed into law, and it became effective in March 1989. The 1988 act attempted to remedy the enforcement shortcomings of the original legislation. It significantly strengthened federal fair housing enforcement by, among other things, establishing an administrative enforcement mechanism, allowing HUD to pursue cases filed by an individual before an administrative law judge for disposition and providing for civil penalties.

In November 1990, FHIP was extended for 2 additional years,³ and with the enactment of the Housing and Community Development Act of 1992, it became a permanent program, effective fiscal year 1993. The 1992 act also expanded the program to reflect significant legislative changes in fair housing and lending that had taken place after the program's creation in 1988.⁴ It authorized FHIP to implement testing programs whenever there was a reasonable basis for doing so; establish new fair housing organizations or expand the capacity of existing ones; conduct special projects to, for example, respond to new or sophisticated forms of housing discrimination; undertake larger, long-term enforcement activities through multiyear funding agreements; and pay for litigation. For fiscal years 1989 through 1997, the Congress appropriated \$113 million for FHIP. The permanent program grew from an appropriation of \$10.6 million in fiscal year 1993 to \$26 million in fiscal year 1995 (see fig. 1).

³By the National Affordable Housing Act of 1990, Nov. 28, 1990.

⁴In addition to the Fair Housing Amendments Act of 1988, significant changes include the 1989 amendments to the Home Mortgage Disclosure Act, which require certain lending institutions to provide federal regulators and the public with additional information on mortgage loan applicants and lending patterns. Also, the 1991 amendments to the Equal Credit Opportunity Act require federal banking regulatory agencies to make referrals to the Department of Justice whenever the regulators have reason to believe that there has been a pattern or practice of discrimination and referrals to HUD when it appears that other violations under the act violate the Fair Housing Act.

Figure 1: Fair Housing Initiatives Program's Appropriations, Fiscal Years 1989 Through 1997



Source: HUD's fiscal years 1989 through 1997 appropriations legislation.

Funds for the program are distributed on the basis of competitive grants through four program initiatives. These initiatives or funding categories generally define who is eligible to receive funds and/or the focus of activities to be funded. The initiatives are (1) the private enforcement initiative—funding for private nonprofit organizations to undertake testing and other enforcement-related activities; (2) the fair housing organizations initiative—funding for private nonprofit organizations to create new fair housing enforcement organizations in those areas of the country that were unserved or underserved by such organizations or expand the capacity of existing private nonprofit fair housing organizations; (3) the education and outreach initiative—funding for private and public entities to educate the general public and housing industry groups about fair housing rights and responsibilities; and (4) the administrative enforcement initiative—funding for state and local government agencies that administer fair housing laws certified by HUD as substantially equivalent to federal law to help such agencies broaden their range of enforcement and compliance activities. Private organizations that receive grants generally are nonprofit entities

and have experience in investigating complaints, testing for fair housing violations, and enforcing legal claims or outcomes.

Activities Eligible for Program Funds

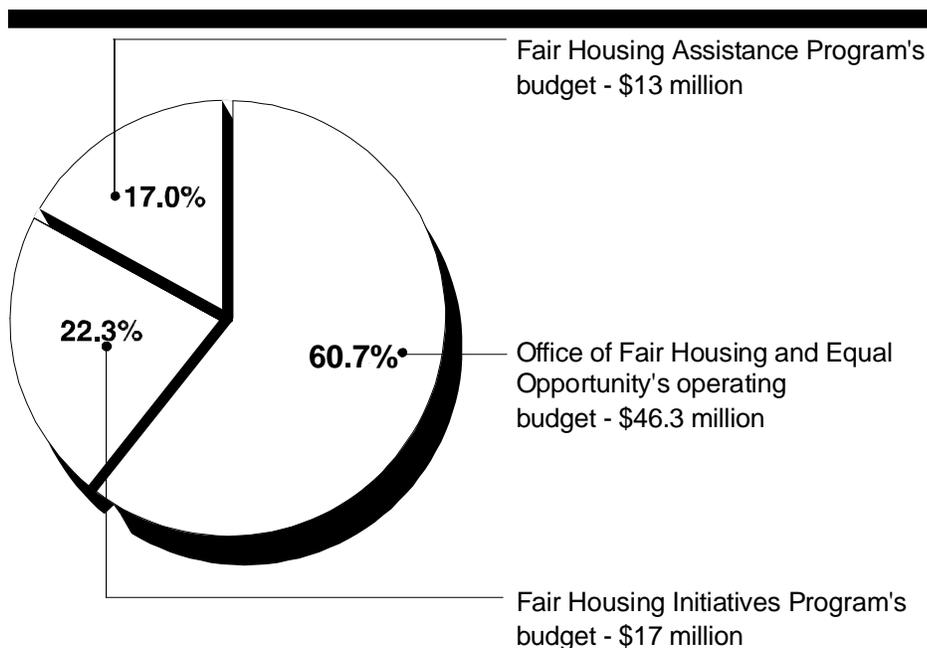
The program provides considerable flexibility in the types of activities that can be funded under each initiative. Eligible activities include education and outreach programs, testing based on complaints and other reasonable bases, the recruitment of testers and attorneys, special projects to respond to new or sophisticated forms of discrimination, litigation expenses, and the creation of new fair housing organizations in areas of the country underserved by fair housing enforcement organizations. The program is restricted from funding two types of activities: (1) settlements, judgments, or court orders in any litigation action involving HUD or HUD-funded housing providers and (2) expenses associated with litigation against the federal government. Appendix I provides additional details on the types of activities eligible for funding under the program.

FHIP's Role as a Key Component of HUD's Fair Housing Enforcement Activities

FHIP is an integral part of HUD's fair housing enforcement and education efforts that are concentrated within the Office of Fair Housing and Equal Opportunity. In addition to FHIP, this office is responsible for the oversight of the Fair Housing Assistance Program, investigation and processing of fair housing complaints, and referral of complaints to Justice when appropriate. FHIP links and extends fair housing enforcement and education and outreach activities to many state and local governments and communities across the country.⁵ The program makes it possible for HUD to look comprehensively at fair housing problems and to work with the whole spectrum of agencies that are involved in fighting housing discrimination. Taken together, FHIP and the Fair Housing Assistance Program, form a national fair housing strategy through greater cooperation between the private and public sectors. In fiscal year 1996, FHIP accounted for about 22 percent of the Office of Fair Housing and Equal Opportunity's \$76.3 million budget (see fig. 2).

⁵While HUD established the Fair Housing Assistance Program to encourage state and local governments to assume more responsibility in enforcing fair housing requirements, 18 state governments do not qualify for financial assistance under the program because they lack a fair housing law substantially equivalent to federal law, along with the administrative capacity. Also, few units of local government (50) qualify for assistance.

Figure 2: Office of Fair Housing and Equal Opportunity's Budget for Fiscal Year 1996



Source: GAO's analysis of data from HUD.

HUD Uses Discretion in Allocating FHIP Funds, and Allocations Are Generally as Proposed in Budgets to the Congress

HUD uses discretion in deciding how FHIP funds are allocated among the four program initiatives. Reflecting the program's principal focus, HUD's budget requests to the Congress set forth how it plans to divide the total amount of dollars requested for FHIP among the four initiatives. Notices of funding availability in the Federal Register indicate the dollar amounts HUD makes available for competition under each program initiative.

HUD's Allocation of FHIP Funds

According to the Acting FHIP Division Director, the Assistant Secretary for Fair Housing and Equal Opportunity determines how funds are allocated on the basis of legislation,⁶ administration and agency priorities, and input from the housing industry and fair housing groups. HUD's allocations for FHIP have consistently reflected that enforcement activities are the

⁶For example, in the enacting legislation for the program, the Congress specified that up to \$3 million of the \$5 million in authorized appropriations (60 percent) could be used for the private enforcement initiative in fiscal years 1988 and 1989.

principal focus of the program. In annual budget justifications to the Congress, HUD discusses its emphasis for the year and indicates how much of FHIP's total budget request it plans to allocate to each FHIP initiative. Table II.1 in appendix II shows by fiscal year the dollar amounts HUD anticipated it would allocate to each initiative.

Dollar Amounts Made Available for Each Initiative

The Congress has appropriated amounts equal to or greater than the amounts HUD requested each fiscal year until 1996.⁷ In accordance with its budget plans, HUD has made the largest portion of FHIP dollars available for the private enforcement initiative. In 2 fiscal years (1993 and 1994) in which HUD received appropriated amounts higher than its budget requests, the additional dollars available resulted in the private enforcement initiative's receiving significantly more money than initially planned. Overall, HUD made about 48 percent of FHIP funds available for the private enforcement initiative (see table II.2).

The relationship between HUD's proposed allocations for each initiative and the funds made available indicates that the dollar amounts were basically the same in 4 of the 8 years (fiscal years 1989 through 1991 and 1995). For the remaining years, allocations varied considerably from HUD's initial budget plans primarily because appropriated amounts for FHIP overall were either higher or lower than the budget requests. The variations were as follows:

- In fiscal year 1992, the amount appropriated for FHIP was the same as the budget request. The private enforcement initiative's allocation was \$1.3 million less than HUD initially anticipated; the administrative enforcement initiative's was \$0.9 million more, and the education and outreach initiative's was \$0.4 million more.
- In fiscal year 1993, FHIP's appropriation was \$3 million higher than the budget request. The private enforcement initiative's allocation was \$1 million more; the education and outreach initiative's, \$0.5 million more. The fair housing organizations initiative, which was authorized in late 1992, received a \$2.6 million allocation. The administrative enforcement initiative's allocation was \$1.1 million less than anticipated, however.
- In fiscal year 1994, FHIP's appropriation was \$3.6 million higher than the budget request. Of this, HUD allocated \$3 million to the private enforcement initiative and \$0.6 million to the fair housing organizations initiative.

⁷For another fiscal year (1990), an appropriations reduction, which was applicable to many federal accounts, resulted in FHIP receiving a \$93,000 decrease in its appropriation. The appropriation was further reduced through a sequestration of \$68,000, to \$5,839,000 (see table II.2).

-
- In fiscal year 1996, FHIP's appropriation was 43 percent lower than the budget request. While the budget request included funds for all initiatives, owing to the reduced appropriation, HUD did not allocate any funds to the administrative enforcement initiative. Allocations to the other three initiatives ranged from 30 to 120 percent of the amount initially requested.

The Demand for FHIP Funds

From fiscal year 1989 through fiscal year 1996, HUD received 2,090 applications for FHIP grants and approved about one-quarter of these applications for funding. Historically, the demand for education and outreach grants has exceeded that for the other three initiatives each fiscal year except for 1996. For the 3 most recent years (fiscal years 1994 through 1996), the greatest demand, as measured by the amounts requested on applications, has been for the private enforcement initiative.

In fiscal year 1996, the number of applications for grants decreased from 300 in each of the 3 previous fiscal years to 91. The most significant decrease was for education and outreach grants, dropping to 19 applications from over 200 the prior year (see table II.3). HUD told us that the significant drop in education and outreach applications is primarily attributable to language in the 1996 appropriations law requiring applicants to meet the definition of a qualified fair housing enforcement organization in order to be eligible for FHIP funds. According to FHIP legislation, a qualified fair housing enforcement organization is a private nonprofit organization that has at least 2 years of experience in complaint intake, complaint investigations, testing, and enforcement of legal claims. HUD told us that the legislative requirement precluded many previously eligible organizations from applying for an education and outreach initiative grant.⁸ Also, according to HUD, a one-third reduction in FHIP's appropriation for that fiscal year discouraged many organizations from applying for FHIP funding.

On the basis of the dollar value of grant applications submitted to HUD, the greatest demand has been for private enforcement initiative grants. Our analysis of the dollar amount of applications is based on fiscal years 1994 through 1996 for which complete information is readily available (see table II.4). Of the total \$175 million in applications received for the 3-year period, \$76 million, or about 43 percent, was for private enforcement

⁸Previously, eligible applicants for education and outreach grants included, among others, housing associations, training organizations, colleges and universities, and city and state governments. The requirement that all organizations meet the definition of a qualified fair housing enforcement organization was removed in the fiscal year 1997 appropriations law.

initiative grants, and about 36 percent was for education and outreach initiative grants.

FHIP Grant Recipients and Activities Are Diverse

From the program's inception through September 1996, a total of 220 different organizations received FHIP grants in 44 states and the District of Columbia; 26 organizations received about half of all FHIP funds awarded. The organizations are located in 15 states and the District of Columbia.

FHIP-funded activities have reflected the program's purpose as described in the legislation. That is, grantees have used FHIP dollars to fund the kinds of activities intended, namely, implementing fair housing testing programs and testing-related activities; establishing new fair housing organizations; and educating the public and housing providers about fair housing requirements.

FHIP Dollars Are Concentrated Among a Limited Number of Grantees

Through fiscal year 1996, HUD awarded 483 grants totaling \$86 million to support fair housing enforcement and education.⁹ Of the 220 different organizations that received grants, 26 received about half of the funds awarded. These 26 organizations, located in 15 states and the District of Columbia, received 179 of the 483 grants. They include state governments; national membership organizations; legal aid organizations; and civil rights and advocacy groups. Some have grants that are national in scope, and some are involved in establishing new fair housing organizations in states that were unserved or underserved by fair housing enforcement organizations. Also, some organizations represent all protected classes, while others focus on a specific target population, such as persons with disabilities. Table 1 identifies the 26 organizations and the number and dollar value of grants received through fiscal year 1996. (See app. III for a complete list of the grants awarded and the dollar amount of each.)

⁹One grant awarded with fiscal year 1989 funds is not included because HUD did not locate the necessary documentation in time for our analysis. We excluded 41 fiscal year 1996 grants because the final statements of work and budgets had not yet been completed as of September 1996. As a result, our discussion of FHIP grant recipients does not include the \$12 million set aside for those 41 grants.

Table 1: Twenty-Six Organizations Awarded the Highest Amounts of FHIP Funds, Fiscal Years 1989 Through 1996

Grantee	Number of grants	Total amount of grants
National Fair Housing Alliance	11	\$6,906,398
Lawyers' Committee for Civil Rights Under Law of Boston Bar Association	12	3,120,927
Open Housing Center, Inc.	11	3,053,568
Leadership Council for Metropolitan Open Communities	12	2,598,474
Metropolitan Milwaukee Fair Housing Council	9	2,166,299
Fair Housing Council of Greater Washington	9	2,067,456
Council for Concerned Citizens	8	1,811,874
Long Island Housing Services	8	1,503,718
Project Sentinel	6	1,423,525
Fair Housing Congress of Southern California	5	1,385,834
Fair Housing Council of Northern New Jersey	6	1,368,267
Toledo Fair Housing Center	5	1,271,258
Housing Opportunities Made Equal of Richmond	7	1,268,215
Massachusetts Commission Against Discrimination	9	1,239,756
Fair Housing Center of Metropolitan Detroit	6	1,234,338
Housing Discrimination Project	8	1,118,487
Cuyahoga Plan of Ohio	7	1,037,033
Metro Fair Housing Services, Inc.	4	1,025,843
Legal Aid Society of Albuquerque	2	1,025,021
John Marshall Law School	4	1,024,280
Fair Housing Council - Kentucky	9	1,022,120
HOPE Fair Housing Center	7	999,720
Asian Americans for Equality	3	910,345
Arizona Fair Housing Center	2	898,950
Austin Tenants' Council	5	819,474
Arizona Attorney General's Office	4	782,842
Total	179	\$43,084,022

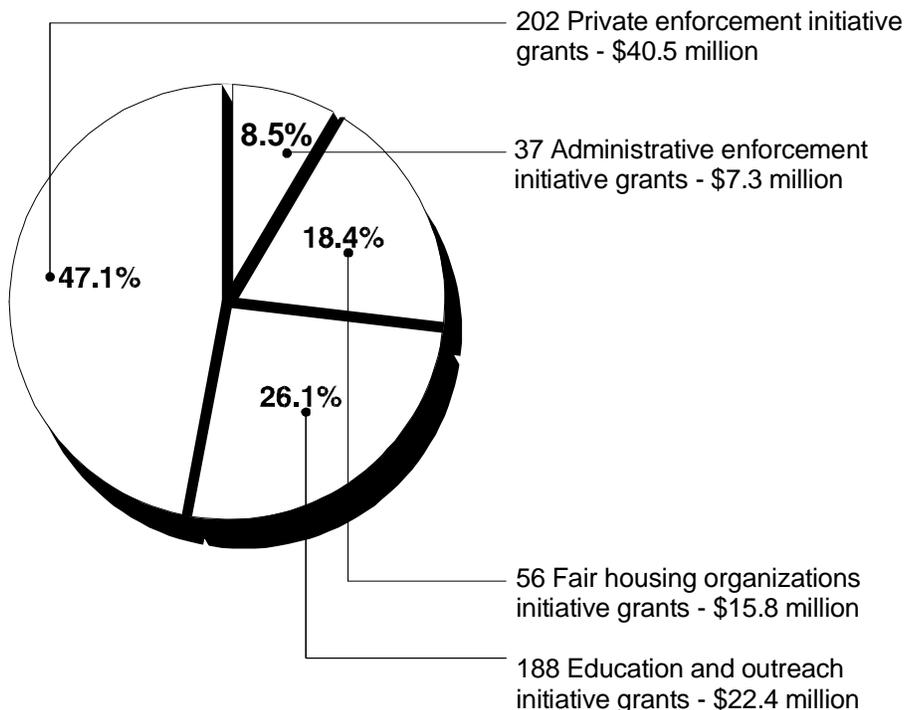
Many of these organizations received grants in consecutive years as well as grants under more than one FHIP initiative. For example, the National Fair Housing Alliance received at least one grant during each fiscal year of FHIP funding, including two education and outreach grants from 1991 funds, two private enforcement grants and one fair housing organizations grant from 1994 funds, and a fair housing organizations and an education and outreach grant from 1995 funds.¹⁰ The Metropolitan Milwaukee Fair Housing Council also received one grant each fiscal year and two grants in each of two fiscal years—a private enforcement grant and an education and outreach grant in 1990 and two private enforcement grants in 1994. The Open Housing Center, Inc., received three grants in 1994 and two in 1995, but none in 1993. Some of the 26 organizations received grants that were awarded for multiyear projects, and these grants were generally much larger than single-year grants.

Most FHIP Funds Are Used for Enforcement

FHIP grant awards reflect the program's emphasis on private enforcement-related activities. From fiscal year 1989 through 1996, the largest percentage of FHIP dollars funded activities under the private enforcement initiative—\$40.5 million, or 47 percent. Another \$15.8 million, or 18 percent, was awarded for the fair housing organizations initiative (see fig. 3).

¹⁰With one exception, the fiscal year 1996 solicitation for applications specified that an organization cannot receive more than one grant. A successful applicant under the fair housing organizations initiative is also eligible to receive one additional award under either the private enforcement or education and outreach initiative.

Figure 3: Percentage of FHIP Dollars Awarded for Each Initiative, Fiscal Years 1989 Through 1996



Note: \$86 million awarded through September 1996, representing 483 grants.

Source: GAO's analysis of FHIP grant data.

Overall, FHIP-funded activities consist predominately of testing (complaint-based, systemic, or both) and other enforcement-related activities. Under the private enforcement initiative, in particular, funded activities include, among others, testing to confirm allegations of discrimination in the rental and sale of property, litigating cases, organizing new fair housing offices, and developing computer databases on complaints.

Activities Under FHIP's Four Initiatives Are Diverse

Seventy-nine different organizations received 202 private enforcement initiative grants ranging from \$10,000 to \$1 million and averaging about \$200,500.¹¹ Of the 202 grants we reviewed, 181 were funded to carry out

¹¹Because this section focuses on grants and organizations by program initiative, the number of different organizations that received FHIP grants will total more than the 220 previously discussed. This is because many of the same organizations received grants under more than one initiative.

testing and testing-related activities. The remaining 21 grants were funded to engage in other enforcement-related activities, such as litigating cases; recruiting and/or training attorneys; developing fair housing databases; establishing a statewide attorney network to handle complaints from member offices; and training volunteers and community residents.

In addition, private enforcement initiative grants funded special projects that focus on high-priority issues such as mortgage lending discrimination and insurance redlining. Included among those awards was a fiscal year 1992 grant for \$1 million to support a large-scale national testing program to assess mortgage lending discrimination. Information obtained from FHIP-funded projects can be used by either public or private nonprofit organizations, or HUD, as the basis for a formal complaint against individuals or lending institutions. Several FHIP-funded projects involving testing mortgage lenders and insurance companies were completed in 1995, and as a result, complaints have been filed with HUD against three of the largest home insurance companies and five of the largest independent mortgage companies in the country.

Under FHIP's fair housing organizations initiative, 47 different groups received 56 grants ranging from \$30,000 to \$1,859,000 and averaging about \$282,500. While organizations with grants under the fair housing organizations initiative may engage in many of the same activities as the private enforcement initiative grantees, the fair housing organizations initiative was established to create new fair housing enforcement organizations in those areas of the country that were unserved or underserved by these organizations or expand the capacity of existing private nonprofit fair housing organizations. Of the 56 fair housing organizations initiative grants, 19 were used to establish new organizations. According to HUD, some grants funded more than one new fair housing organization, and in total, 23 new organizations have been established with FHIP grants. The new organizations are located primarily in the southern and western United States—areas historically underserved by fair housing enforcement programs, according to HUD. Fair housing organizations initiative grantees were also funded to recruit and train testers, implement testing programs, and conduct community outreach to inform the public about the services provided by newly established fair housing organizations.

One hundred and twenty-eight different organizations received 188 education and outreach initiative grants ranging from \$6,500 to \$1,182,900 and averaging about \$119,300. A wide range of activities were funded to

provide education and outreach under this initiative's three components—national, regional and local, and community-based. Overall, the principal activities for the 188 education and outreach grants were developing pamphlets and brochures; preparing print, television, and radio advertisements; producing video and audio tapes; and providing conferences and seminars for other interested parties, including the housing industry, consumers, and community organizations.

Twenty-two different organizations received 37 administrative enforcement initiative grants ranging from \$55,300 to \$439,300 and averaging about \$197,200. About two-thirds of those grants funded at least one type of testing, that is, complaint-based or systemic. Other FHIP-funded activities include staff training, community training, tester recruitment, and conciliation/settlement activities.

FHIP Funds May Not Be Used to Sue the Federal Government

To determine whether grantees used FHIP funds to sue the government, we asked HUD's Office of General Counsel to identify FHIP grantees involved in litigation with the government. The General Counsel identified 10 cases involving 7 grantees who had filed lawsuits against the government since the inception of the program. Of the 10 lawsuits, 4 (involving 3 grantees) were filed and resolved before a FHIP grant was awarded to the fair housing organization. For the remaining six lawsuits (involving four grantees), pro bono legal services or other resources were used to pursue the cases against the U.S. government, according to HUD.

HUD's Final Assessments Indicate General Satisfaction With Grantees' Use of Funds

HUD has generally been satisfied with grantees' use of funds. During the grant performance period and before closing out a grant, HUD reviews quarterly reports and products provided by the grantee to ensure that the organization's performance is consistent with the grant agreement. At the end of the grant period and after receipt of the final performance reports and products, HUD completes a closeout review. For this final assessment, HUD determines whether the grantee performed all grant requirements, indicates whether all work is acceptable, and rates the grantee's performance.

Our analysis of the available assessments of 206 grants that had been closed out as of November 1996 indicates that HUD believes that the grantees generally carried out the activities as agreed. HUD rated 21 grantees as excellent, 150 as good, 27 as fair, and 6 as unsatisfactory.¹² For

¹²Two of the assessments did not indicate a rating.

the six grantees rated unsatisfactory, the primary reason cited was a failure to complete all the expected work requirements usually because of personnel changes within the organization.

According to HUD, these 206 grants did not represent the total of all grants that should have been closed out and evaluated. An additional 118 grants for which the work has been completed and final payments have been made have yet to be closed out. The Acting FHIP Division Director told us that performing closeout reviews is an administrative process and, as such, is a low-priority item. According to HUD's Office of Procurement and Contracts, neither federal regulations nor HUD's guidelines include a specific time frame for completing the reviews.

Agency Comments

We provided a draft of this report to HUD for review and comment. We discussed the draft report with HUD officials, including the Acting FHIP Division Director. In commenting, HUD said that the report presents an accurate description of how FHIP funds are used. HUD also provided other comments consisting primarily of suggested changes to technical information, and we incorporated these in the report where appropriate.

We conducted our work between August 1996 and February 1997 in accordance with generally accepted government auditing standards. Appendix IV describes our objectives, scope, and methodology.

We will send copies of this report to congressional committees and subcommittees interested in housing matters; the Secretary of Housing and Urban Development; the Director, Office of Management and Budget; and other interested parties. We will also make copies available to others upon request. If you would like additional information on this report, please call me at (202) 512-7631. Major contributors to this report are listed in appendix V.



Lawrence J. Dyckman
Associate Director, Housing and
Community Development Issues

Contents

Letter	1
Appendix I Examples of Eligible Activities	18
Appendix II Data on Funding for the Fair Housing Initiatives Program and the Demand for Funds	19
Appendix III List of Grantees by FHIP Initiative for Fiscal Years 1989 Through 1996	22
Appendix IV Objectives, Scope, and Methodology	36
Appendix V Major Contributors to This Report	39
Tables	
Table 1: Twenty-six Organizations Awarded the Highest Amounts of FHIP Funds, Fiscal Years 1989 Through 1996	10
Table II.1: HUD-Proposed Allocations, by Initiative and Fiscal Year	19
Table II.2: FHIP Funds Made Available, by Initiative and Fiscal Year	20

Table II.3: Number of Applications for FHIP Grants, by Initiative and Fiscal Year	20
Table II.4: Dollar Value of Applications for FHIP Grants, by Initiative and Fiscal Year	21

Figures

Figure 1: Fair Housing Initiatives Program's Appropriations, Fiscal Years 1989 Through 1997	4
Figure 2: Office of Fair Housing and Equal Opportunity's Budget for Fiscal Year 1996	6
Figure 3: Percentage of FHIP Dollars Awarded for Each Initiative, Fiscal Years 1989 Through 1996	12

Abbreviations

FHIP	Fair Housing Initiatives Program
GAO	General Accounting Office
HUD	Department of Housing and Urban Development

Examples of Eligible Activities

Type of initiative	Eligible activities
Private enforcement initiative	<ul style="list-style-type: none"> • testing and other investigative activities to identify housing discrimination; • remedies for discrimination in real estate markets; • special projects, including the development of prototypes to respond to new or sophisticated forms of discrimination; • technical assistance to local fair housing organizations; • the formation and development of new fair housing organizations; • capacity building to investigate housing discrimination complaints for all protected classes; • regional enforcement activities to address broader housing discrimination practices; and • litigation costs and expenses, including expert witness fees.
Fair housing organizations initiative/ Continued development component	<ul style="list-style-type: none"> • staff training; • education and outreach to promote awareness of services provided by new organizations; • technical assistance and mentoring services for new organizations; and • activities listed above under the private enforcement initiative.
Fair housing organizations initiative/ New organizations component	<ul style="list-style-type: none"> • projects that help establish, organize, and build the capacity of fair housing enforcement organizations in targeted unserved and underserved areas of the country.
Education and outreach initiative	<ul style="list-style-type: none"> • media campaigns, including public service announcements, television, radio and print advertisements, posters, pamphlets and brochures; • seminars, conferences, workshops and community presentations; • guidance to housing providers on meeting their Fair Housing Act obligations; • meetings with housing industry and civic or fair housing groups to identify and correct illegal real estate practices; • activities to meet state and local government fair housing planning requirements; and • projects related to observance of National Fair Housing Month.
Administrative enforcement initiative	<ul style="list-style-type: none"> • fair housing testing programs and other related enforcement activities; • systemic discrimination investigations; • remedies for discrimination in real estate markets; • technical assistance to government agencies administering housing and community development programs concerning applicable fair housing laws and regulations; and • computerized complaint processing and the monitoring of system improvements.

Data on Funding for the Fair Housing Initiatives Program and the Demand for Funds

The following four tables provide details on the Department of Housing and Urban Development's (HUD) allocation of funds among the Fair Housing Initiatives Program's (FHIP) four funding initiatives or categories, the dollar amounts made available under each category, and the level of demand for funds under each category. The demand is indicated by both the number of applicants and the dollars requested.

Table II.1: HUD-Proposed Allocations, by Initiative and Fiscal Year

Dollars in millions

Initiative	1989	1990	1991	1992	1993	1994	1995	1996	Total	
									Dollars	Percent
Administrative enforcement initiative	0	0	0	\$1.6	\$2.1	\$ 1.5	\$ 3.0	\$ 4.0	\$ 12.2	12
Education and outreach initiative	\$2.0	\$2.0	\$2.0	2.1	2.5	3.0	7.0	6.0	26.6	25
Fair housing organizations initiative	a	a	a	a	a	6.4	7.0	10.0	23.4	22
Private enforcement initiative	3.0	4.0	3.6	4.3	3.0	6.0	9.0	10.0	42.9	41
Total	\$5.0	\$6.0	\$5.6	\$8.0	\$7.6	\$16.9	\$26.0	\$30.0	\$105.1	100

^aNot applicable.

Source: HUD's fiscal years 1989 through 1996 congressional budget justifications.

**Appendix II
Data on Funding for the Fair Housing
Initiatives Program and the Demand for
Funds**

Table II.2: FHIP Funds Made Available, by Initiative and Fiscal Year

Dollars in millions

Initiative	1989	1990	1991	1992	1993	1994	1995	1996	Total	
									Dollars	Percent
Administrative enforcement initiative	0	0	0	\$2.5	\$ 1.0	\$ 1.5	\$ 3.0	0	\$ 8.0	8
Education and outreach initiative	\$2.0	\$1.9	\$1.9	2.6	3.0	3.0	6.8	\$ 2.0	23.2	24
Fair housing organizations initiative	a	a	a	a	2.6	7.0	7.3	3.0	19.9	20
Private enforcement initiative	3.0	3.9	3.8	3.0	4.0	9.0	9.0	12.0	47.7	48
Total	\$5.0	\$5.8	\$5.7	\$8.1	\$10.6^b	\$20.5^c	\$26.1	\$17.0	\$98.8	100

^aNot applicable.

^bThe amount appropriated in fiscal year 1993 exceeded the budget request by \$3 million.

^cThe amount appropriated in fiscal year 1994 exceeded the budget request by \$3.6 million.

Table II.3: Number of Applications for FHIP Grants, by Initiative and Fiscal Year

Initiative	1989	1990	1991	1992	1993	1994	1995	1996	Total	
									Number	Percent
Administrative enforcement initiative	a	a	a	16	24	17	18	a	75	4
Education and outreach initiative	183	178	150	218	201	187	216	19	1,352	65
Fair housing organizations initiative	a	a	a	a	49	49	59	19	176	8
Private enforcement initiative	58	50	48	58	72	85	63	53	487	23
Total	241	228	198	292	346	338	356	91	2,090	100

Note: HUD was unable to provide data for one selection panel.

^aNot applicable.

**Appendix II
Data on Funding for the Fair Housing
Initiatives Program and the Demand for
Funds**

**Table II.4: Dollar Value of Applications
for FHIP Grants, by Initiative and Fiscal
Year**

Dollars in millions					
Initiative	1994	1995	1996	Total	
				Dollar	Percent ^b
Administrative enforcement initiative	\$2.2	\$3.6	^a	\$5.8	3
Education and outreach initiative	23.5	37.5	\$2.5	63.5	36
Fair housing organizations initiative	10.5	14.9	4.6	30.0	17
Private enforcement initiative	18.8	34.1	22.6	75.5	43
Total	\$55.0	\$90.1	\$29.7	\$174.8	100

^aNot applicable.

^bFigures do not add to 100 percent because of rounding.

List of Grantees by FHIP Initiative for Fiscal Years 1989 Through 1996

Recipient	Location	Initiative	Amount
1989 grants			
Independent Housing Services	San Francisco, CA	EOI	\$45,020
National Association of Protection and Advocacy Systems	Washington, DC	EOI	50,765
International Association of Official Human Rights Agencies	Washington, DC	EOI	70,000
Metropolitan Washington Council of Governments	Washington, DC	EOI	26,954
National Fair Housing Alliance	Washington, DC	EOI	1,182,941
National Association of Protection and Advocacy Systems	Washington, DC	EOI	30,000
Massachusetts Commission Against Discrimination	Boston, MA	EOI	33,722
Boston Fair Housing Commission	Boston, MA	EOI	35,112
State of New Jersey, Department of Law and Public Safety	Trenton, NJ	EOI	29,661
New Mexico State Housing	Santa Fe, NM	EOI	51,594
Metropolitan Phoenix Fair Housing Center ^a	Phoenix, AZ	PEI	50,486
Fair Housing Congress of Southern California	Los Angeles, CA	PEI	140,000
Operation Sentinel	Palo Alto, CA	PEI	66,263
Fair Housing Association of Connecticut, Inc.	Bridgeport, CT	PEI	10,000
Metro Fair Housing Services, Inc.	Atlanta, GA	PEI	197,329
SER\JOBS for Progress, Inc.	Waukegan, IL	PEI	29,933
Access Living of Metropolitan Chicago	Chicago, IL	PEI	135,948
Interfaith Housing Center of the Northern Suburbs	Winnetka, IL	PEI	32,000
Leadership Council for Metropolitan Open Communities	Chicago, IL	PEI	88,000
HOPE Fair Housing Center	Wheaton, IL	PEI	38,000
South Suburban Housing Center	Homewood, IL	PEI	36,498
Northwest Indiana Open Housing Center	Gary, IN	PEI	60,636
Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association	Boston, MA	PEI	149,208
Housing Allowance Project, Inc.	Springfield, MA	PEI	117,000
Suburban Maryland Fair Housing, Inc.	Rockville, MD	PEI	12,750
Fair Housing Center of Metropolitan Detroit	Detroit, MI	PEI	145,208
Legal Aid Society of Minneapolis	Minneapolis, MN	PEI	60,000
Council for Concerned Citizens	Great Falls, MT	PEI	97,509
Fair Housing Council of Northern New Jersey	Hackensack, NJ	PEI	250,000
Civic League of Greater New Brunswick	New Brunswick, NJ	PEI	97,664
Long Island Housing Services	Islandia, NY	PEI	63,864
Open Housing Center, Inc.	New York, NY	PEI	150,107
Westchester Residential Opportunities, Inc.	White Plains, NY	PEI	59,220
Legal Aid Society of New York	New York, NY	PEI	112,774
Housing Opportunities Made Equal-Buffalo	Buffalo, NY	PEI	36,181
Fair Housing Contact Service	Akron, OH	PEI	74,705

(continued)

Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996

Recipient	Location	Initiative	Amount
Toledo Community Housing Resource Board	Toledo, OH	PEI	67,000
Cuyahoga Plan of Ohio	Cleveland, OH	PEI	89,566
Oregon Legal Services Corporation	Portland, OR	PEI	93,365
Fair Housing Council of Delaware County	Media, PA	PEI	73,683
Housing Opportunities Corporation	Memphis, TN	PEI	91,525
Housing Opportunities Made Equal of Richmond	Richmond, VA	PEI	91,521
Metropolitan Milwaukee Fair Housing Council	Milwaukee, WI	PEI	164,774
Total		43	4,538,486
1990 grants			
Alaska Human Rights Commission	Anchorage, AK	EOI	34,015
Magnolia Community Resource Board	Magnolia, AR	EOI	30,591
City of Phoenix	Phoenix, AZ	EOI	75,000
Arizona Attorney General's Office	Phoenix, AZ	EOI	42,036
Old Pueblo Community Housing Resource Board	Tucson, AZ	EOI	30,000
Fair Housing Council of San Diego	San Diego, CA	EOI	28,456
Housing for All, Metro Denver Fair Housing Center	Denver, CO	EOI	75,000
Colorado Department of Institutions	Denver, CO	EOI	20,280
Fair Housing Council of Greater Washington	Washington, DC	EOI	68,010
National Council of La Raza	Washington, DC	EOI	249,864
Iowa Civil Rights Commission	Des Moines, IA	EOI	75,000
Caldwell Community Housing Resource Board	Caldwell, ID	EOI	65,894
Leadership Council for Metropolitan Open Communities	Chicago, IL	EOI	75,000
Chicago Area Fair Housing Alliance	Chicago, IL	EOI	47,795
NAACP-Illinois State Conference of Branches	Decatur, IL	EOI	12,436
Wyandotte County Community Housing Resource Board	Kansas City, KS	EOI	30,000
Fair Housing Council-Kentucky	Louisville, KY	EOI	42,192
Community Housing Resource Board of Lake Charles	Lake Charles, LA	EOI	36,090
Massachusetts Commission Against Discrimination	Boston, MA	EOI	65,393
Massachusetts Association of Realtors	Waltham, MA	EOI	13,528
York County Community Action Corporation	Sanford, ME	EOI	43,803
Legal Aid Society of Minneapolis	Minneapolis, MN	EOI	46,903
Montana Human Rights Commission	Helena, MT	EOI	75,000
Elizabeth City State University	Elizabeth City, NC	EOI	72,500
Urban Housing Foundation, Inc.	Omaha, NE	EOI	37,419
Camden County Community Housing Resource Board	Camden, NJ	EOI	74,480
New York State Division of Human Rights	New York, NY	EOI	74,880
National Urban League	New York, NY	EOI	256,932
Long Island Housing Services	Islandia, NY	EOI	74,972
Professional Housing Services, Inc.	Cleveland, OH	EOI	6,500

(continued)

**Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996**

Recipient	Location	Initiative	Amount
Cuyahoga Plan of Ohio	Cleveland, OH	EOI	74,064
City of Tulsa, Department of Human Rights	Tulsa, OK	EOI	29,125
Multnomah County Community Development Division	Portland, OR	EOI	74,895
Booker T. Washington Center, Inc.	Erie, PA	EOI	28,492
Chattanooga Community Housing Resource Board	Chattanooga, TN	EOI	25,175
City of El Paso	El Paso, TX	EOI	70,260
Virginia Polytechnic Institute and University	Blacksburg, VA	EOI	52,092
Fair Housing Council of Fox Valley	Appleton, WI	EOI	9,972
Metropolitan Milwaukee Fair Housing Council	Milwaukee, WI	EOI	62,052
Metropolitan Phoenix Fair Housing Center	Phoenix, AZ	PEI	45,398
Marin Housing Center	San Rafael, CA	PEI	87,828
Project Sentinel	Palo Alto, CA	PEI	98,969
Fair Housing Council of Greater Washington	Washington, DC	PEI	128,612
National Fair Housing Alliance	Washington, DC	PEI	507,027
Mental Health Law Project	Washington, DC	PEI	86,865
Housing Opportunities Project for Excellence, Inc.	Miami, FL	PEI	66,470
Metro Fair Housing Services, Inc.	Atlanta, GA	PEI	186,920
HOPE Fair Housing Center	Wheaton, IL	PEI	49,777
Interfaith Housing Center of the Northern Suburbs	Winnetka, IL	PEI	51,800
Leadership Council for Metropolitan Open Communities	Chicago, IL	PEI	218,681
South Suburban Housing Center	Homewood, IL	PEI	34,591
Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association	Boston, MA	PEI	234,861
Fair Housing Center of Metropolitan Detroit	Detroit, MI	PEI	198,760
Council for Concerned Citizens	Great Falls, MT	PEI	97,509
Fair Housing Council of Northern New Jersey	Hackensack, NJ	PEI	200,000
Truckee Meadows Fair Housing	Reno, NV	PEI	65,040
Open Housing Center, Inc.	New York, NY	PEI	154,338
Medger Evers College, Center for Law and Social Justice	New York, NY	PEI	107,349
Long Island Housing Services	Islandia, NY	PEI	95,688
Housing Opportunities Made Equal-Buffalo	Buffalo, NY	PEI	41,997
Monroe County Legal Assistance Corporation	Rochester, NY	PEI	71,640
Westchester Residential Opportunities, Inc.	White Plains, NY	PEI	64,390
Toledo Fair Housing Center	Toledo, OH	PEI	108,283
Cuyahoga Plan of Ohio	Cleveland, OH	PEI	156,233
Fair Housing Contact Service	Akron, OH	PEI	73,849
Metropolitan Fair Housing Council of Greater Oklahoma City	Oklahoma City, OK	PEI	98,337
Urban League of Pittsburgh, Inc.	Pittsburgh, PA	PEI	118,161
Housing Opportunities Corporation	Memphis, TN	PEI	115,973

(continued)

**Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996**

Recipient	Location	Initiative	Amount
Housing Opportunities Made Equal of Richmond	Richmond, VA	PEI	74,142
Metropolitan Milwaukee Fair Housing Council	Milwaukee, WI	PEI	101,861
Total		70	6,047,445
1991 grants			
Alaska State Commission for Human Rights	Anchorage, AK	EOI	75,000
Arkansas Delta Housing Development Corporation	Forrest City, AR	EOI	75,000
Fair Housing Congress of Southern California	Los Angeles, CA	EOI	74,360
Housing for All, Metro Denver Fair Housing Center	Denver, CO	EOI	39,398
International Association of Official Human Rights Agencies	Washington, DC	EOI	40,000
Howard University	Washington, DC	EOI	99,573
National Fair Housing Alliance	Washington, DC	EOI	25,000
Fair Housing Council of Greater Washington	Washington, DC	EOI	75,000
Neighborhood Federation for Neighborhood Diversity	Washington, DC	EOI	88,995
National Fair Housing Alliance	Washington, DC	EOI	75,000
Commission on Equal Opportunity	Atlanta, GA	EOI	75,000
Leadership Council for Metropolitan Open Communities	Chicago, IL	EOI	60,000
Fair Housing Council-Kentucky	Louisville, KY	EOI	47,116
Community Action, Inc.	Haverhill, MA	EOI	49,607
Massachusetts Rehabilitation Commission	Boston, MA	EOI	186,287
NAACP Special Contribution Fund	Baltimore, MD	EOI	40,000
Maine Human Rights Commission	Augusta, ME	EOI	70,574
Northern Bergen County Community Housing Resource Board	Hackensack, NJ	EOI	58,200
Housing Help, Inc.	Greenlawn, NY	EOI	34,930
Open Housing Center, Inc.	New York, NY	EOI	75,000
Long Island Housing Services	Islandia, NY	EOI	75,000
Cuyahoga Plan of Ohio	Cleveland, OH	EOI	75,000
Fair Housing Council of Oregon	Portland, OR	EOI	75,000
Tenants' Action Group of Philadelphia	Philadelphia, PA	EOI	73,249
Providence Housing Authority	Providence, RI	EOI	37,115
State of South Carolina Human Affairs Commission	Columbia, SC	EOI	75,000
City of Dallas, Fair Housing Office	Dallas, TX	EOI	74,991
Austin Tenants' Council	Austin, TX	EOI	43,500
Heartland Human Relations Association	La Mesa, CA	PEI	69,846
Project Sentinel	Palo Alto, CA	PEI	195,094
Fair Housing Congress of Southern California	Los Angeles, CA	PEI	56,926
Marin Housing Center	San Rafael, CA	PEI	58,500
Housing for All, Metro Denver Fair Housing Center	Denver, CO	PEI	57,278
Mental Health Law Project	Washington, DC	PEI	90,000
Fair Housing Council of Greater Washington	Washington, DC	PEI	186,795

(continued)

**Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996**

Recipient	Location	Initiative	Amount
Housing Opportunities Project for Excellence, Inc.	Miami, FL	PEI	77,376
South Suburban Housing Center	Homewood, IL	PEI	55,000
HOPE Fair Housing Center	Wheaton, IL	PEI	68,000
Interfaith Housing Center of the Northern Suburbs	Winnetka, IL	PEI	61,260
Chicago Lawyers' Committee for Civil Rights Under Law, Inc.	Chicago, IL	PEI	77,169
Access Living of Metropolitan Chicago	Chicago, IL	PEI	158,610
Leadership Council for Metropolitan Open Communities	Chicago, IL	PEI	93,932
Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association	Boston, MA	PEI	196,841
Housing Discrimination Project	Holyoke, MA	PEI	149,530
Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association	Boston, MA	PEI	277,408
Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association	Boston, MA	PEI	325,000
Fair Housing Center of Metropolitan Detroit	Detroit, MI	PEI	166,810
Fair Housing Council of Northern New Jersey	Hackensack, NJ	PEI	134,825
Civic League of Greater New Brunswick	New Brunswick, NJ	PEI	75,107
Open Housing Center, Inc.	New York, NY	PEI	224,184
Westchester Residential Opportunities, Inc.	White Plains, NY	PEI	79,940
New York Lawyers for Public Interest	New York, NY	PEI	46,000
Housing Opportunities Made Equal-Buffalo	Buffalo, NY	PEI	46,455
Toledo Community Housing Resource Board	Toledo, OH	PEI	114,259
Oregon Legal Services Corporation	Portland, OR	PEI	99,997
Fair Housing Council of Suburban Philadelphia	Upper Darby, PA	PEI	99,340
Housing Opportunities Corporation	Memphis, TN	PEI	221,094
Housing Opportunities Made Equal of Richmond	Richmond, VA	PEI	87,566
Metropolitan Milwaukee Fair Housing Council	Milwaukee, WI	PEI	155,254
Total		59	5,698,291
1992 grants			
Arizona Attorney General's Office	Phoenix, AZ	AEI	231,920
Connecticut Commission on Human Rights and Opportunities	Hartford, CT	AEI	439,312
Indiana Civil Rights Commission	Indianapolis, IN	AEI	82,387
Massachusetts Commission Against Discrimination	Boston, MA	AEI	76,376
Montana Human Rights Commission	Helena, MT	AEI	148,767
North Carolina Human Relations Commission	Raleigh, NC	AEI	163,386
Nebraska Equal Opportunity Commission	Lincoln, NE	AEI	176,067
Ohio Civil Rights Commission	Columbus, OH	AEI	250,056
Texas Commission on Human Rights	Austin, TX	AEI	234,495
King County Office of Civil Rights and Compliance	Seattle, WA	AEI	55,340

(continued)

**Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996**

Recipient	Location	Initiative	Amount
Greater Birmingham Fair Housing Center	Birmingham, AL	EOI	79,376
Independent Housing Services	San Francisco, CA	EOI	55,442
Project Sentinel	Palo Alto, CA	EOI	78,417
Howard University	Washington, DC	EOI	116,788
Fair Housing Council of Greater Washington	Washington, DC	EOI	109,585
Iowa Civil Rights Commission	Des Moines, IA	EOI	75,745
Latinos United	Chicago, IL	EOI	91,881
Interfaith Housing Center of the Northern Suburbs	Winnetka, IL	EOI	80,000
John Marshall Law School	Chicago, IL	EOI	200,418
Leadership Council for Metropolitan Open Communities	Chicago, IL	EOI	50,000
Housing Coalition of the Southern Suburbs	Dolton, IL	EOI	63,000
Kansas Human Relations Association	Salina, KS	EOI	86,230
Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association	Boston, MA	EOI	121,431
Massachusetts Housing Finance Agency	Boston, MA	EOI	53,043
Housing Discrimination Project	Holyoke, MA	EOI	88,706
ARC of Massachusetts	Waltham, MA	EOI	108,169
Greater Baltimore Board of Realtors, Inc.	Baltimore, MD	EOI	50,000
Portland West Neighborhood Planning Council	Portland, ME	EOI	73,098
Access Resources of Missouri	St. Louis, MO	EOI	33,191
Council for Concerned Citizens	Great Falls, MT	EOI	74,314
North Carolina State University, Office of Research, Outreach and Extension	Raleigh, NC	EOI	189,218
Gloucester County	Glassboro, NJ	EOI	62,845
State of New Jersey, Department of Public Advocacy	Trenton, NJ	EOI	147,309
Long Island Housing Services	Islandia, NY	EOI	166,300
Legal Aid Society of New York	New York, NY	EOI	92,000
Cuyahoga Plan of Ohio	Cleveland, OH	EOI	118,115
Housing Consortium for Disabled Individuals	Philadelphia, PA	EOI	55,724
Austin Tenants' Council	Austin, TX	EOI	50,000
City of Lynchburg	Lynchburg, VA	EOI	44,000
Housing Opportunities Made Equal of Richmond	Richmond, VA	EOI	107,747
Virginia State University	Petersburg, VA	EOI	103,887
Madison Equal Opportunities Commission	Madison, WI	EOI	57,310
Project Sentinel	Palo Alto, CA	PEI	99,689
Housing Rights, Inc.	Berkley, CA	PEI	14,000
Housing for All, Metro Denver Fair Housing Center	Denver, CO	PEI	95,000
National Fair Housing Alliance	Washington, DC	PEI	1,000,000
Fair Housing Council of Greater Washington	Washington, DC	PEI	187,812

(continued)

**Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996**

Recipient	Location	Initiative	Amount
Housing Opportunities Project for Excellence, Inc.	Miami, FL	PEI	90,002
HOPE Fair Housing Center	Wheaton, IL	PEI	66,640
Leadership Council for Metropolitan Open Communities	Chicago, IL	PEI	110,777
South Suburban Housing Center	Homewood, IL	PEI	55,000
Fair Housing Council-Kentucky	Louisville, KY	PEI	49,923
Housing Discrimination Project	Holyoke, MA	PEI	136,631
Fair Housing Center of Metropolitan Detroit	Detroit, MI	PEI	157,000
Council for Concerned Citizens	Great Falls, MT	PEI	99,627
Fair Housing Council of Northern New Jersey	Hackensack, NJ	PEI	195,606
Housing Opportunities Made Equal-Buffalo	Buffalo, NY	PEI	50,420
Open Housing Center, Inc.	New York, NY	PEI	282,387
Westchester Residential Opportunities, Inc.	White Plains, NY	PEI	88,494
Toledo Fair Housing Center	Toledo, OH	PEI	128,470
Fair Housing Council of Oregon	Portland, OR	PEI	104,098
Metropolitan Milwaukee Fair Housing Council	Milwaukee, WI	PEI	147,029
Total		62	7,900,000
1993 grants			
Colorado Civil Rights Division	Denver, CO	AEI	259,803
Illinois Department of Human Rights	Chicago, IL	AEI	130,514
Massachusetts Commission Against Discrimination	Boston, MA	AEI	429,197
Massachusetts Commission Against Discrimination	Boston, MA	AEI	160,500
City of Dallas, Fair Housing Office	Dallas, TX	AEI	141,497
King County Office of Civil Rights and Compliance	Seattle, WA	AEI	207,113
Southern Arizona Housing Center	Tucson, AZ	EOI	98,803
National Association of Protection and Advocacy Systems	Washington, DC	EOI	126,028
National Puerto Rican Coalition	Washington, DC	EOI	200,000
National Fair Housing Alliance	Washington, DC	EOI	199,554
Fair Housing Council-Kentucky	Louisville, KY	EOI	139,283
Massachusetts Housing Finance Agency	Boston, MA	EOI	186,126
City of Boston, Boston Fair Housing Commission	Boston, MA	EOI	49,980
City of Southfield	Southfield, MI	EOI	130,000
Michigan Department of Civil Rights	Detroit, MI	EOI	117,435
Metropolitan St. Louis Equal Housing Opportunity Council	St. Louis, MO	EOI	98,624
West Jackson Community Development Corporation	Jackson, MS	EOI	89,060
Council for Concerned Citizens	Great Falls, MT	EOI	116,191
Durham Affordable Housing Coalition	Durham, NC	EOI	90,856
New York State Division of Human Rights	New York, NY	EOI	77,052
Housing Help, Inc.	Greenlawn, NY	EOI	50,000
State University of New York Research Foundation	Amherst, NY	EOI	199,873

(continued)

**Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996**

Recipient	Location	Initiative	Amount
Toledo Fair Housing Center	Toledo, OH	EOI	115,112
Pacific Nonprofit Training Center	Portland, OR	EOI	199,990
Austin Tenants' Council	Austin, TX	EOI	52,000
Prince William County	Woodbridge, VA	EOI	56,662
Tacoma Human Rights Department	Tacoma, WA	EOI	122,592
ACORN Fair Housing Organization-Arkansas	Little Rock, AR	FHOI	500,418
Arkansas Delta Housing Development Corporation	Forrest City, AR	FHOI	113,915
Arkansas Fair Housing Council	Little Rock, AR	FHOI	197,256
Midpeninsula Citizens for Fair Housing	Palo Alto, CA	FHOI	42,522
Metro Fair Housing Services, Inc.	Atlanta, GA	FHOI	502,542
Idaho Legal Aid Services, Inc.	Boise, ID	FHOI	419,240
Chicago Lawyers' Committee for Civil Rights Under Law, Inc.	Chicago, IL	FHOI	88,666
Fair Housing Council-Kentucky	Louisville, KY	FHOI	121,773
ACORN Fair Housing Organization-Louisiana	New Orleans, LA	FHOI	500,000
Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association	Boston, MA	FHOI	209,386
Legal Aid of Western Missouri	Kansas City, MO	FHOI	155,398
Metropolitan St. Louis Equal Housing Opportunity Council	St. Louis, MO	FHOI	305,697
Council for Concerned Citizens	Great Falls, MT	FHOI	447,666
Billings Fair Housing Alliance, Inc.	Billings, MT	FHOI	30,000
Family Housing Advisory Services, Inc.	Omaha, NE	FHOI	366,372
Civic League of Greater New Brunswick	New Brunswick, NJ	FHOI	99,708
Fair Housing Partnership of Greater Pittsburgh	Pittsburgh, PA	FHOI	130,000
Northwest Fair Housing Alliance	Spokane, WA	FHOI	472,045
Greater Birmingham Fair Housing Center	Birmingham, AL	PEI	150,742
Marin Housing Center	San Rafael, CA	PEI	105,233
Project Sentinel	Palo Alto, CA	PEI	417,999
Fair Housing Congress of Southern California	Los Angeles, CA	PEI	312,728
Connecticut Housing Coalition	Wethersfield, CT	PEI	285,117
ACORN	Washington, DC	PEI	754,228
HOPE Fair Housing Center	Wheaton, IL	PEI	97,545
Access Living of Metropolitan Chicago	Chicago, IL	PEI	394,762
Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association	Boston, MA	PEI	379,315
Council for Concerned Citizens	Great Falls, MT	PEI	448,200
Fair Housing Council of Northern New Jersey	Hackensack, NJ	PEI	287,836
Legal Aid Society of New York	New York, NY	PEI	92,500
Housing Opportunities Made Equal-Buffalo	Buffalo, NY	PEI	183,774
New York Lawyers for Public Interest	New York, NY	PEI	225,757

(continued)

**Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996**

Recipient	Location	Initiative	Amount
Westchester Residential Opportunities, Inc.	White Plains, NY	PEI	297,262
Long Island Housing Services	Islandia, NY	PEI	572,832
Tenants' Action Group of Philadelphia	Philadelphia, PA	PEI	164,999
Fair Housing Council of Suburban Philadelphia	Upper Darby, PA	PEI	196,947
Metropolitan Milwaukee Fair Housing Council	Milwaukee, WI	PEI	305,511
Total		64	14,219,736
1994 grants			
Arizona Attorney General's Office	Phoenix, AZ	AEI	177,078
Iowa Civil Rights Commission	Des Moines, IA	AEI	116,998
Kentucky Commission on Human Rights	Louisville, KY	AEI	106,336
Massachusetts Commission Against Discrimination	Boston, MA	AEI	133,000
Pennsylvania Human Relations Commission	Harrisburg, PA	AEI	287,306
Texas Commission on Human Rights	Austin, TX	AEI	231,845
Industrial Commission of Utah, Anti-Discrimination Division	Salt Lake City, UT	AEI	117,718
Catholic Community Services of Southern Arizona (dba the Direct Independent Living Center)	Tucson, AZ	EOI	77,448
Mental Health Advocacy Project	San Jose, CA	EOI	63,520
Independent Living Resource Center of San Francisco	San Francisco, CA	EOI	70,991
Conference of Mayors, Research and Education Foundation	Washington, DC	EOI	236,593
Access Video Fund	Washington, DC	EOI	224,487
Howard University	Washington, DC	EOI	220,319
National Community Reinvestment Coalition	Washington, DC	EOI	242,494
Iowa Citizens for Community Improvement	Des Moines, IA	EOI	22,704
John Marshall Law School	Chicago, IL	EOI	184,607
Leadership Council for Metropolitan Open Communities	Chicago, IL	EOI	875,787
Massachusetts Rehabilitation Commission	Boston, MA	EOI	103,000
Housing Discrimination Project	Holyoke, MA	EOI	87,825
Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association	Boston, MA	EOI	94,163
Baltimore Neighborhoods, Inc.	Baltimore, MD	EOI	90,173
Legal Aid Bureau of Southwestern Michigan	Kalamazoo, MI	EOI	99,969
North Carolina State University, Center for Accessible Living	Raleigh, NC	EOI	191,640
New Mexico State Housing	Santa Fe, NM	EOI	82,871
Asian Americans for Equality	New York, NY	EOI	99,350
Northern Manhattan Improvement Corporation	New York, NY	EOI	88,782
YWCA of Salem	Salem, OR	EOI	156,153
ACORN Housing Corporation, Inc.	Philadelphia, PA	EOI	220,000
Booker T. Washington Center, Inc.	Erie, PA	EOI	56,972
Housing Opportunities Made Equal of Richmond	Richmond, VA	EOI	178,625

(continued)

**Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996**

Recipient	Location	Initiative	Amount
Champlain Valley Office of Economic Opportunity	Burlington, VT	EOI	76,997
Legal Aid Society of Santa Clara County	San Jose, CA	FHOI	239,965
Fair Housing Council of San Diego	San Diego, CA	FHOI	98,297
Center for Legal Advocacy (dba the Legal Center Serving Persons With Disabilities)	Denver, CO	FHOI	285,244
National Fair Housing Alliance	Washington, DC	FHOI	1,858,631
Fair Housing Continuum	Cocoa, FL	FHOI	479,812
Iowa Protection and Advocacy Services, Inc.	Des Moines, IA	FHOI	150,702
Housing Discrimination Project	Holyoke, MA	FHOI	120,996
Neighborhood Legal Services, Inc.	Lynn, MA	FHOI	114,774
Legal Aid Society of Minneapolis	Minneapolis, MN	FHOI	268,589
Civil Rights Consortium	Kansas City, MO	FHOI	365,685
North Mississippi Rural Legal Services	Oxford, MS	FHOI	146,068
University of Mississippi Law Center	University, MS	FHOI	244,901
North Carolina Client and Community	Raleigh, NC	FHOI	461,083
Community Health Law Project	East Orange, NJ	FHOI	199,425
New Mexico Fair Housing Organization	Albuquerque, NM	FHOI	481,892
Legal Aid Society of Albuquerque	Albuquerque, NM	FHOI	425,021
Nevada Legal Services	Las Vegas, NV	FHOI	694,897
Open Housing Center, Inc.	New York, NY	FHOI	260,675
Long Island Housing Services	Islandia, NY	FHOI	218,646
Medger Evers College, Center for Law and Social Justice	New York, NY	FHOI	198,411
Lorain County Urban League, Inc.	Elyria, OH	FHOI	158,324
Protection and Advocacy for People With Disabilities	Columbia, SC	FHOI	122,180
Austin Tenants' Council	Austin, TX	FHOI	82,283
Pierce County Community Action Agency	Tacoma, WA	FHOI	442,328
North East Wisconsin Fair Housing Council, Inc.	Appleton, WI	FHOI	153,592
Greater Birmingham Fair Housing Center	Birmingham, AL	PEI	344,249
Southern Arizona Housing Center	Tucson, AZ	PEI	205,741
Arizona Fair Housing Center	Phoenix, AZ	PEI	342,319
Fair Housing Congress of Southern California	Los Angeles, CA	PEI	801,820
Fair Housing Council of San Diego	San Diego, CA	PEI	139,806
Inland Mediation Board	Ontario, CA	PEI	184,626
Sentinel Fair Housing	Oakland, CA	PEI	189,196
Housing Rights, Inc.	Berkeley, CA	PEI	80,831
Housing for All, Metro Denver Fair Housing Center	Denver, CO	PEI	216,000
National Fair Housing Alliance	Washington, DC	PEI	127,133
Fair Housing Council of Greater Washington	Washington, DC	PEI	378,792
National Fair Housing Alliance	Washington, DC	PEI	299,981

(continued)

**Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996**

Recipient	Location	Initiative	Amount
Housing Opportunities Project for Excellence, Inc.	Miami, FL	PEI	324,121
Metro Fair Housing Services, Inc.	Atlanta, GA	PEI	139,052
South Suburban Housing Center	Homewood, IL	PEI	35,000
John Marshall Law School	Chicago, IL	PEI	400,000
HOPE Fair Housing Center	Wheaton, IL	PEI	83,658
Leadership Council for Metropolitan Open Communities	Chicago, IL	PEI	147,889
Lawyer's Committee for Better Housing, Inc.	Chicago, IL	PEI	155,830
Leadership Council for Metropolitan Open Communities	Chicago, IL	PEI	192,733
Interfaith Housing Center of the Northern Suburbs	Winnetka, IL	PEI	78,998
Fair Housing Council-Kentucky	Louisville, KY	PEI	229,210
New Orleans Legal Assistance Corporation	New Orleans, LA	PEI	141,468
Housing Discrimination Project	Holyoke, MA	PEI	349,018
Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association	Boston, MA	PEI	373,415
Baltimore Neighborhoods, Inc.	Baltimore, MD	PEI	140,935
Fair Housing Center of Metropolitan Detroit	Detroit, MI	PEI	151,400
Fair Housing Center of Metropolitan Detroit	Detroit, MI	PEI	415,160
Legal Aid Bureau of Southwestern Michigan	Kalamazoo, MI	PEI	105,944
Council for Concerned Citizens	Great Falls, MT	PEI	430,858
Western Montana Fair Housing	Missoula, MT	PEI	279,010
Fair Housing Council of Northern New Jersey	Hackensack, NJ	PEI	300,000
Housing Coalition of Central New Jersey	New Brunswick, NJ	PEI	80,000
Truckee Meadows Fair Housing	Reno, NV	PEI	131,644
Long Island Housing Services	Islandia, NY	PEI	236,416
Brooklyn Legal Services Corporation	Brooklyn, NY	PEI	397,200
Open Housing Center, Inc.	New York, NY	PEI	208,798
Legal Services of Central New York	Syracuse, NY	PEI	127,668
Open Housing Center, Inc.	New York, NY	PEI	590,150
Housing Advocates, Inc.	Cleveland, OH	PEI	200,000
Toledo Fair Housing Center	Toledo, OH	PEI	299,947
Fair Housing Contact Service	Akron, OH	PEI	165,684
Housing Opportunities Made Equal Committee of Cincinnati	Cincinnati, OH	PEI	92,264
Toledo Fair Housing Center	Toledo, OH	PEI	619,446
Cuyahoga Plan of Ohio	Cleveland, OH	PEI	194,069
Fair Housing Council of Oregon	Portland, OR	PEI	246,380
Fair Housing Council of Suburban Philadelphia	Upper Darby, PA	PEI	339,426
West Tennessee Legal Services	Jackson, TN	PEI	123,900
Housing Opportunities Made Equal of Richmond	Richmond, VA	PEI	528,380
Housing Opportunities Made Equal of Richmond	Richmond, VA	PEI	200,234

(continued)

**Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996**

Recipient	Location	Initiative	Amount
Metropolitan Milwaukee Fair Housing Council	Milwaukee, WI	PEI	283,044
Metropolitan Milwaukee Fair Housing Council	Milwaukee, WI	PEI	346,774
Total		108	26,483,790
1995 grants			
Arizona Attorney General's Office	Phoenix, AZ	AEI	331,808
Iowa Civil Rights Commission	Des Moines, IA	AEI	273,326
Indiana Civil Rights Commission	Indianapolis, IN	AEI	135,420
Massachusetts Commission Against Discrimination	Boston, MA	AEI	174,246
Massachusetts Commission Against Discrimination	Boston, MA	AEI	108,615
Maryland Commission on Human Relations	Baltimore, MD	AEI	142,543
Montana Human Rights Commission	Helena, MT	AEI	235,846
Ohio Civil Rights Commission	Columbus, OH	AEI	274,200
Pennsylvania Human Relations Commission	Harrisburg, PA	AEI	414,600
Rhode Island Commission for Human Rights	Providence, RI	AEI	123,370
Fort Worth Human Relations Commission	Fort Worth, TX	AEI	109,231
Texas Commission on Human Rights	Austin, TX	AEI	124,966
Washington State Human Rights Commission	Olympia, WA	AEI	394,516
Tacoma Human Rights Department	Tacoma, WA	AEI	97,639
Greater Birmingham Fair Housing Center	Birmingham, AL	EOI	147,624
Southern Arizona Housing Center	Tucson, AZ	EOI	225,000
National Center for Youth Law	San Francisco, CA	EOI	197,718
Protection and Advocacy, Inc.	Sacramento, CA	EOI	309,225
City and County of San Francisco	San Francisco, CA	EOI	151,891
Colorado Coalition for the Homeless	Denver, CO	EOI	108,894
National Community Reinvestment Coalition	Washington, DC	EOI	411,238
National Neighbors, Inc.	Washington, DC	EOI	430,812
National Fair Housing Alliance	Washington, DC	EOI	1,131,301
Iowa Citizens for Community Improvement	Des Moines, IA	EOI	62,047
John Marshall Law School	Chicago, IL	EOI	239,255
Leadership Council for Metropolitan Open Communities	Chicago, IL	EOI	88,000
Mayor's Office for People With Disabilities	Chicago, IL	EOI	146,838
Kansas Human Relations Association	Salina, KS	EOI	95,122
Fair Housing Council-Kentucky	Louisville, KY	EOI	97,534
Fair Housing Council-Kentucky	Louisville, KY	EOI	130,251
Massachusetts Commission Against Discrimination	Boston, MA	EOI	58,707
ARC of Massachusetts	Waltham, MA	EOI	149,625
Housing Discrimination Project	Holyoke, MA	EOI	99,139
West Jackson Community Development Corporation	Jackson, MS	EOI	139,570
North Carolina State University, Center for Universal Design	Raleigh, NC	EOI	221,242

(continued)

**Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996**

Recipient	Location	Initiative	Amount
State University of New York Research Foundation	Amherst, NY	EOI	199,543
New York State Division of Human Rights	New York, NY	EOI	110,000
Westchester Residential Opportunities, Inc.	White Plains, NY	EOI	55,952
Black River Housing Council, Inc.	Watertown, NY	EOI	50,000
Open Housing Center, Inc.	New York, NY	EOI	261,499
Asian Americans for Equality	New York, NY	EOI	310,995
Cuyahoga Plan of Ohio	Cleveland, OH	EOI	329,986
Pacific Nonprofit Training Center	Portland, OR	EOI	350,130
Eugene/Springfield/Cottage Grove (et al.) Community Housing Resources Board	Eugene, OR	EOI	131,316
Golden Triangle Radio Information Center	Pittsburg, PA	EOI	85,366
Tennessee Association of Legal Services, Legal Aid Projects	Nashville, TN	EOI	90,060
Fair Housing Council of Greater Washington	Washington, DC	FHOI	332,850
National Fair Housing Alliance	Washington, DC	FHOI	499,830
Chicago Lawyers' Committee for Civil Rights Under Law, Inc.	Chicago, IL	FHOI	176,310
Fair Housing Council-Kentucky	Louisville, KY	FHOI	164,838
Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association	Boston, MA	FHOI	160,803
Housing Discrimination Project	Holyoke, MA	FHOI	86,642
Legal Aid Society of Minneapolis	Minneapolis, MN	FHOI	179,253
Legal Aid of Western Missouri	Kansas City, MO	FHOI	210,578
North Carolina Fair Housing Center	Raleigh, NC	FHOI	37,348
New Hampshire Legal Assistance	Concord, NH	FHOI	113,540
Open Housing Center, Inc.	New York, NY	FHOI	246,430
Asian Americans for Equality	New York, NY	FHOI	500,000
Fair Housing Partnership of Greater Pittsburgh	Pittsburgh, PA	FHOI	137,859
Fair Housing of Marin, Inc.	San Rafael, CA	PEI	557,419
Housing for All, Metro Denver Fair Housing Center	Denver, CO	PEI	93,953
Connecticut Housing Coalition	Wethersfield, CT	PEI	353,328
HOPE Fair Housing Center	Wheaton, IL	PEI	596,100
Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association	Boston, MA	PEI	599,096
Legal Aid Society of Albuquerque	Albuquerque, NM	PEI	600,000
Legal Aid Society of New York	New York, NY	PEI	105,445
Housing Opportunities Made Equal Committee of Cincinnati	Cincinnati, OH	PEI	214,657
Tenants' Action Group of Philadelphia	Philadelphia, PA	PEI	195,000
Metropolitan Milwaukee Fair Housing Council	Milwaukee, WI	PEI	600,000
Total		69	16,317,485

(continued)

**Appendix III
List of Grantees by FHIP Initiative for Fiscal
Years 1989 Through 1996**

Recipient	Location	Initiative	Amount
1996 grants			
National Puerto Rican Coalition	Washington, DC	EOI	443,484
Massachusetts Housing Finance Agency	Boston, MA	EOI	361,658
Arizona Fair Housing Center	Phoenix, AZ	PEI	556,631
Project Sentinel	Palo Alto, CA	PEI	533,357
Fair Housing Council of Greater Washington	Washington, DC	PEI	600,000
Jacksonville Area Legal Aid	Jacksonville, FL	PEI	592,915
Leadership Council for Metropolitan Open Communities	Chicago, IL	PEI	597,675
Open Housing Center, Inc.	New York, NY	PEI	600,000
Austin Tenants' Council	Austin, TX	PEI	591,691
Total		9	4,877,411
Total grants		484	\$86,082,643

Legend

EOI = Education and outreach initiative

PEI = Private enforcement initiative

AEI = Administrative enforcement initiative

FHOI = Fair housing organizations initiative

dba = doing business as

^aThis grant was not part of our file review as HUD did not locate the necessary documentation in time for our analysis.

Objectives, Scope, and Methodology

As requested, we reviewed (1) how funds are allocated among the four FHIP initiatives, the dollar amounts made available for each initiative, and the level of demand for funds under each initiative and (2) who receives FHIP funds and how the funds are being used. We are also providing background information, as you requested, on the history of FHIP and activities that can be funded under the program.

To obtain information on FHIP, its funding, and eligible activities, we reviewed the program's legislative history, regulations, policies, procedures, and Federal Register notices that solicited applications from eligible fair housing agencies and organizations. We also reviewed HUD's annual reports to the Congress on fair housing programs for 1993 and 1994 and obtained descriptions and budgets for other HUD-administered fair housing activities. We interviewed the Director, Office of Fair Housing Initiatives and Voluntary Programs (who also is the Acting FHIP Division Director); FHIP's government technical representatives; the Deputy Assistant Secretary, Enforcement and Investigations; and the Director, Office of Investigations, Fair Housing and Equal Opportunity.

We also interviewed FHIP officials at the HUD's Southwest and Midwest Regions in Fort Worth, Texas and Chicago, Illinois, respectively, as well as officials of six organizations that received FHIP grants. In addition, we held discussions with the National Association of Realtors and the Mortgage Bankers Association and attended the 1996 New England and Mid-Atlantic Fair Housing Conference.

To determine how HUD allocates funds among the four program initiatives, we reviewed and analyzed FHIP congressional budget justifications for fiscal years 1989 to 1997. We also reviewed memorandums and correspondence regarding funding allocations and HUD's priorities for FHIP since its inception. To determine the amounts available for award, we reviewed FHIP's notices of funding availability as published in the Federal Register for fiscal years 1989 through 1996.

To determine the demand for funds, we reviewed and analyzed the available selection results, including technical evaluation panels' reports, which contained lists of grant applicants and the panels' recommendations to the Assistant Secretary for Fair Housing and Equal Opportunity. We reviewed technical evaluation reports to compile data on the number of applications by fiscal year and by program initiative. We also analyzed the dollar value of applications for those years for which complete information was readily available—fiscal years 1994 to 1996. Additionally,

we reviewed program guidance on the selection process and interviewed HUD government technical representatives involved in the selection process.

To identify the recipients of FHIP funds and the amount of dollars received, we obtained a copy of the FHIP funding and contract tracking system's database, which contained 486 grant listings as of October 1996. Many grant numbers were not accompanied by the grantee organizations' names and locations. To develop a more complete list, we compared the listed grant numbers to other HUD-provided reports and added names and locations to the database where possible. We used this database as a control for our review of the FHIP grant files. During our review of the files, we filled in the missing names and locations and verified all other grantees' names and locations, as well as the grant amounts and year of appropriation.

To determine how FHIP dollars are being used, we developed a data collection instrument to record data from grant files on the activities organizations agreed to carry out under the program. In developing the instrument, we interviewed program officials, reviewed FHIP legislation and regulations, notices of funding availability, and a sample of FHIP grant files. HUD program officials reviewed and commented on the data collection instrument, and we incorporated their suggested changes. For grants awarded through fiscal year 1996, we reviewed the available grant files (483) and recorded on the data collection instrument the activities each grantee agreed to carry out. We used the information to develop a database from which we analyzed the number and dollar value of the grants awarded to organizations and the kinds of activities funded under each FHIP initiative. We also reviewed the available final performance assessments (206) to determine whether grantees completed work as agreed and how HUD rated their overall performance. We did not independently verify the accuracy of the final performance assessments. In addition, we interviewed HUD Inspector General officials in each HUD region regarding their reviews of FHIP grantees.

To determine whether any grantees have used FHIP funds to pay expenses associated with litigation against the U.S. government, we interviewed officials in HUD's Office of General Counsel, namely, the Assistant General Counsel, Fair Housing Enforcement Division, and Managing Attorney, Litigation Division. At our request, HUD's General Counsel contacted agency attorneys in each region to determine whether they had knowledge of any lawsuits filed by FHIP grantees against the government. We

Appendix IV
Objectives, Scope, and Methodology

interviewed the Acting FHIP Division Director, responsible government technical representatives, and government technical monitors about their knowledge of the cases identified. We also reviewed correspondence from grantees concerning whether FHIP funds were used to pursue litigation.

Major Contributors to This Report

Resources,
Community, and
Economic
Development Division

Patricia D. Moore
Jeannie B. Davis
Michael L. Mgebroff
Vondalee R. Hunt
Alice G. Feldesman
John T. McGrail

Ordering Information

The first copy of each GAO report and testimony is free. Additional copies are \$2 each. Orders should be sent to the following address, accompanied by a check or money order made out to the Superintendent of Documents, when necessary. VISA and MasterCard credit cards are accepted, also. Orders for 100 or more copies to be mailed to a single address are discounted 25 percent.

Orders by mail:

U.S. General Accounting Office
P.O. Box 6015
Gaithersburg, MD 20884-6015

or visit:

Room 1100
700 4th St. NW (corner of 4th and G Sts. NW)
U.S. General Accounting Office
Washington, DC

Orders may also be placed by calling (202) 512-6000 or by using fax number (301) 258-4066, or TDD (301) 413-0006.

Each day, GAO issues a list of newly available reports and testimony. To receive facsimile copies of the daily list or any list from the past 30 days, please call (202) 512-6000 using a touchtone phone. A recorded menu will provide information on how to obtain these lists.

For information on how to access GAO reports on the INTERNET, send an e-mail message with "info" in the body to:

info@www.gao.gov

or visit GAO's World Wide Web Home Page at:

<http://www.gao.gov>

**United States
General Accounting Office
Washington, D.C. 20548-0001**

**Bulk Rate
Postage & Fees Paid
GAO
Permit No. G100**

**Official Business
Penalty for Private Use \$300**

Address Correction Requested

