

**ADDENDUM TO THE
ARLINGTON HOUSING AUTHORITY
ADMINISTRATIVE PLAN**



**REASONABLE STEPS TO AFFIRMATIVELY
FURTHER FAIR HOUSING
IN THE
HOUSING CHOICE VOUCHER
FAMILY SELF SUFFICIENCY PROGRAM**

**-PUBLIC COMMENT VERSION-
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Please submit any comments by July 28, 2008 attention:

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REASONABLE STEPS TO AFFIRMATIVELY FURTHER FAIR HOUSING IN THE HOUSING CHOICE VOUCHER FAMILY SELF-SUFFICIENCY (FSS) PROGRAM

The Arlington Housing Authority is aware that Federal and state fair housing laws make it illegal to discriminate in the sale or rent of housing based on: race, color, religion, sex, handicap, familial status or national origin.

In order to promote Fair Housing rights for Housing Choice Voucher (HCV) Family Self-Sufficiency (FSS) participants, it is the policy of the Arlington Housing Authority (AHA) to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment. The AHA shall not deny any family or individual the equal opportunity to apply for, or receive assistance under the HCV Family Self-Sufficiency Program on the basis of race, color, sex, religion, creed, national or ethnic origin, age, familial or marital status, handicap or disability, or sexual orientation.

Role of the City of Arlington

The Arlington Housing Authority and the City of Arlington established an Interlocal Agreement in 1988. Through the interlocal agreement all AHA employees are also City of Arlington employees and are responsible to follow applicable City ordinances including the Arlington City Council ordinance on Fair Housing adopted February 7, 1995.

The City of Arlington's Fair Housing Officer is responsible for the implementation and compliance with the Fair Housing Ordinance. The Fair Housing Officer performs his/her duty in accordance with the policy directives of the City Council and can recommend rules and regulations to aid in the implementation and facilitation of the ordinance. Moreover, the Fair Housing Officer works with the U. S. Department of Housing & Urban Development (HUD) and the U.S. Attorney General's Office in the enforcement of the Fair Housing Act of 1968, as amended, and cooperates with the Texas Commission on Human Rights in the enforcement of the Texas Fair Housing Act. To ensure compliance with fair housing laws and ordinances, Arlington's Fair Housing Officer acts on fair housing complaints received by HUD. Information from HUD is utilized so that the City's Fair Housing Officer can prepare a complaint analysis.

The Arlington Housing Authority will continue to work with the City as appropriate in addressing Fair Housing issues and strategies to ameliorate any impediments to Fair Housing. In conjunction with this, the Arlington Housing Authority will work cooperatively with collaborative partner agencies to expand housing opportunities for clients needing transitional housing assistance. It will also create and make available Fair Housing information to its clients and promote housing opportunities. The Arlington Housing Authority will also work diligently with the City of Arlington Fair Housing Officer and HUD on any and all Fair Housing complaints filed by its participants or applicants.

Reasonable steps to affirmatively further fair housing for the HCV-FSS Program

The Arlington Housing Authority will take reasonable steps to affirmatively further fair housing in its HCV-FSS program and maintain records of those steps and their impacts. These steps will include:

1) Advertising widely in the community for the coordinator position or positions, should they become available.

- All AHA employees are City of Arlington employees, as such vacant positions are advertised fairly and broadly by the City of Arlington on their website. AHA generally publishes vacant positions through industry group publications e.g.; nationwide distribution through NAHRO.

2) Marketing the FSS program to all eligible persons, including persons with disabilities and persons with limited English proficiency.

- The AHA markets the availability of the FSS program through briefing orientations with applicants and program participants
- The AHA has conducted a four factor analysis in its efforts to serve applicants and participants with limited English proficiency. The AHA will continue to monitor its potential and current client pool to determine which vital documents to translate to make the HCV-FSS program more accessible to non-English speaking clients. The AHA has also implemented the use of the “I Speak” cards to assist clients needing translation services. The AHA will continue to use the City of Arlington’s translators, as appropriate, at no cost to the client.

3) Making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities.

- In providing notice of the availability of housing assistance for low-income families under the HCV-FSS program requirements, the AHA will use its website to assure that the notice reaches eligible individuals with disabilities by posting notices on the AHA website [www. arlingtonhousing.us](http://www.arlingtonhousing.us)
- The AHA provides reasonable accommodation for applicants and participants who are unable to come into the office by making home visits where necessary to ensure access to services.
- As a reasonable accommodation for a person with disabilities, the AHA will approve reasonable requests by families with a disabled head-of-household for an exception rent for a regular tenancy under the HCV-FSS program so that the program is readily accessible to and usable by persons with disabilities.
- It is the intent of the Arlington Housing Authority that no FSS participant with disabilities be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because the AHA's facilities are inaccessible to or unusable by persons with disabilities. The AHA's office(s) are accessible to persons with physical disabilities. Accessibility for the hearing impaired is provided by the Texas Relay telephone service provider.

- The AHA encourages participation by owners, having accessible units and will note these units in the listing of available units which is distributed to HCV-FSS voucher holders who are seeking units. The listings are also ordered by bedroom size and by zip codes. The units in areas of the City of Arlington with lower concentrations of poverty are listed first.
- In order to ensure that participating owners do not discriminate in the HCV-FSS assisted program, a recipient shall enter into a HUD-approved contract with participating owners, which shall include necessary assurances of nondiscrimination.
- The AHA assists qualified voucher holders who need to have their rental units made handicap accessible. Architectural Barrier Removal modifications to a rental unit are available in the form of a grant to eligible renters through the Housing Rehabilitation program. The Housing Rehabilitation program is administered and operated by the AHA with funding provided by the City of Arlington's HOME and CDBG programs. With the permission of the property owner, HCV-FSS participants may be assisted with grab bars, widening doors, ramps and other mobility accessibility modifications.

4) Providing fair housing counseling services to fair housing agencies.

- All AHA staff is informed of the importance of affirmatively furthering fair housing and providing equal opportunity to all families, including providing reasonable accommodations to persons with disabilities, as a part of the overall commitment to quality customer service. Staff attends local fair housing update training sponsored by HUD to keep current with new developments and is participating in the development of a Fair Housing Impediment Study.
- The Arlington Housing Authority is aware that an essential ingredient of fair housing opportunity and enforcement is the education of the public regarding rights and responsibilities afforded by fair housing law. This includes the education of housing providers as well as HCV-FSS participants, the potential victims of discrimination. Likewise, it is important for property owners and managers to know their responsibilities and when they may be violating fair housing law. Therefore, staff continues to work toward increasing community awareness of local, state, and federal fair housing laws by using HUD notices, circulars, and meetings with property owners and other community groups. In particular, staff meets with the Landlord Advisory Group on a regular basis and keeps them current on any pertinent regulations to managing the HCV-FSS program, including Fair Housing requirements.

5) Informing participants on how to file a fair housing complaint.

- To further its commitment to full compliance with applicable Fair Housing laws, the AHA will provide Federal/State/local information to Housing Choice Voucher Family Self-Sufficiency holders regarding unlawful discrimination and any recourse available to families who believe they are victims of a discriminatory act. Such information will be made available during the family briefing sessions and available upon request at the AHA front desk.

- In particular, HUD's Housing Discrimination Complaint Form is explained to applicants and participants, and is included in the Fair Share Voucher holder's packet along with the "*Fair Housing: It's Your Right*" booklet.
- Should a client desire to file a complaint under Title VII of the Civil Rights Act of 1968 and the Fair Housing Amendments of 1998, the AHA will make a referral to the City of Arlington's Fair Housing Officer or the HUD office where such assistance may be obtained or refer them to HUD's Fair Housing office.
- The AHA will also inform FSS participants that they can file a Fair Housing complaint by calling 1-800-669-9777. They may also file a complaint on-line at: www.hud.gov/offices/fheo/FHLaws/.

6) Recruiting landlords and service providers in areas that expand housing choice to program participants.

- The AHA makes concerted efforts to expand housing choice for all HCV-FSS participants by recruiting property owners in areas of the City of Arlington with low minority concentrations based on data obtained from the 2000 Census.
- To expand housing choice for HCV-FSS participants, the AHA also maintains maps which are distributed at briefing sessions for HCV-FSS participants which depict areas of the City of Arlington with low poverty and minority concentrations and provides information on school performance, job centers, etc. so that voucher holders can locate units close to jobs, amenities and good schools.