FAIR HOUSING AND EQUAL OPPORTUNITY

FSS ADDENDUM

INTRODUCTION
This document has been created for the purpose of outlining the strategies AHA will employ to ensure equal access to the AHA FSS program. The strategies in this document are consistent with the goals and objectives as outlined in the AHA Administrative Plan and FSS Action Plan.

GENERAL POLICIES
In the administration of the Family Self-Sufficiency (FSS) and all other housing programs, AHA will comply fully with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment, including:

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- Executive Order 11063
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- Violence Against Women Reauthorization Act of 2005 (VAWA)
- When more than one civil rights law applies to a situation, the laws will be read and applied together.
- Any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants, or staff that may subsequently be enacted

Federal regulations prohibit discrimination against certain protected classes. State and local requirements, as well as AHA policies, can prohibit discrimination against additional classes of people.

AHA shall not discriminate because of race, color, sex, religion, familial status, age, disability or national origin (called “protected classes”)

Familial status includes children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18.
AHA Policy

The PHA will not deny admission into the FSS program on the basis of marital status or sexual orientation.

The AHA will not use any of these factors to:

- Deny to any family the opportunity to apply for the FSS program, nor deny to any qualified applicant the opportunity to participate in the FSS program
- Restrict anyone's access to any benefit enjoyed by others in connection with the FSS program
- Treat a person differently in determining eligibility or other requirements for admission into the FSS program.
- Deny anyone access to the same level of services

INFORMATION TO FAMILIES

AHA will provide FSS program information to all families at the time of admissions to the AHA HCV program. Information will be provided both orally and in writing. Thereafter, AHA will utilize tenant newsletters, program flyers and other promotional materials to provide program updates to all program families.

General FSS program information, including information on the benefits of the program and FSS admissions requirements, will be provided in other languages, as needed. AHA will use the Limited English Proficiency (LEP) guidelines to make determinations regarding translation of program documents.

DISCRIMINATION COMPLAINTS

If an applicant or participant believes that any family member has been discriminated against by the AHA or an owner, the family should advise AHA as soon as possible. HUD requires AHA to make every reasonable attempt to determine whether the applicant’s or participant’s assertions have merit and take any warranted corrective action. In addition, AHA is required to provide the applicant or participant with information about how to file a discrimination complaint [24 CFR 982.304].

AHA Policy

Applicants or participants who believe that they have been subject to unlawful discrimination may notify AHA either orally or in writing.

AHA will attempt to remedy discrimination complaints made against the PHA.

AHA will provide a copy of a discrimination complaint form to the complainant and provide them with information on how to complete and submit the form to HUD’s Office of Fair Housing and Equal Opportunity (FHEO).
AHA will also provide the applicant or participant with information on how to contact the local fair housing council for further support and/or assistance.

ACCESS TO FSS TO PERSONS WITH DISABILITIES

AHA will ensure that persons with disabilities have access to the FSS program and services. The responsibility to ensure access begins with the first inquiry of an interested family and continues through every programmatic area of the HCV program.

*AHA Policy*

AHA will ask all applicants and participants if they require any type of accommodations, in writing, on the intake application, reexamination documents, and notices of adverse action by the PHA, by including the following language:

“If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority.”

A name and phone number of the FSS Coordinator will be indicated as the contact for requests for accommodation for persons with disabilities related to participation in the FSS program.

REASONABLE ACCOMMODATION

A person with a disability may require special accommodations in order to have equal access to the FSS program. The types of reasonable accommodations AHA can provide include changes, exceptions, or adjustments to a rule, policy, practice, or service.

*AHA Policy*

AHA will encourage the family to make its request in writing using a reasonable accommodation request form. However, AHA will consider the accommodation any time the family indicates that an accommodation is needed whether or not a formal written request is submitted.

SUPPORTIVE SERVICES

As outlined in the FSS Action Plan, AHA works with local service providers to ensure that FSS participants have access to services that will support efforts to achieve self-sufficiency.

*AHA Policy*

AHA will actively seek partnerships with agencies that assist persons with disabilities to ensure that the needs of all FSS participants are addressed.
FSS COORDINATOR POSITION

The City of Anaheim is an equal opportunity employer. As such, employment opportunities are open to all candidates who meet the minimum criteria specified for the specific position.

AHA policy

When a position becomes available for a FSS Coordinator, AHA will ensure that the availability of the position is widely advertised throughout the community by sending a notification of the availability to other local PHAs and social service partner agencies in addition to the routine advertising methods utilized by the City of Anaheim.

RECORDKEEPING

Quarterly records will be maintained by race, ethnicity, familial status, and disability status for:

- Applicants for the FSS Coordinator position
- Participants in the FSS Program
- Referrals to fair housing counseling services/fair housing agencies

If any racial/ethnic group, familial group or the disabled population is underrepresented in any of the above categories, outreach will be conducted to increase representation from that population group.