

Review of impediments of fair housing choice in the Tenant Based Section 8 Program.

This action conducted in response to requirements outlined in Section 982.53 (c) of the Federal Regulations. The new equal opportunity requirements obligate housing agencies to affirmatively further fair housing in the programs that it administers.

What follows is a review of progress made on previous year's goals, as well as further analysis of additional impediments and specific action outlined to address those impediments. (This analysis was guided by discussions with program participants, staff review of program records and relevant program experience):

Analysis of impediments to fair housing choice for the Tenant-Based Section 8 Program

1. Listing of handicap accessible units to interested clients is sometimes insufficient.

Goal: Develop a more comprehensive listing of handicap accessible units.

Progress:

- We assigned a specific staff person to coordinate identification and dissemination of known or available handicap accessible units.
- We identified agencies that have listings of handicapped accessible units.
- We had program staff identify handicap accessible units through normal program operation and forward information to staff person responsible for maintaining list.
- We ensured that property owners that list vacant apartments are screened to determine if the units are handicap accessible and if so identified them in that manner.
- We developed a handicap accessible handout for interested clients with a comprehensive listing of known units (not necessarily vacant).

2. Program staff could benefit from ongoing training regarding fair housing laws and responsibilities.

Goal: Continue to ensure that program staff is properly trained regarding fair housing laws and responsibilities.

Progress:

- We identified fair housing agencies offering fair housing training and orientation for program staff.
- We continued to gather information from organizations and agencies involved with fair housing and distributed to program staff to make available to program participants.
- We reserve time at regularly scheduled program staff meetings to discuss fair housing issues.
- We ensure adequate fair housing training for program staff by attending fair housing seminars.

3. If payment standard is not set at a high enough rate, then it limits the number of housing choices for program participants.

Goal: Routinely review payment standard levels to determine the appropriate level that maximizes both adequate housing choices without reducing total number of rental subsidies using the following strategies:

Progress:

- We maintain payment standard levels equal to 110% of published fair market rent or greater. We also apply for any waivers through HUD's approval process to allow for setting the payment standards at a higher percentage rate for each bedroom size when available and applicable.
- We obtained rental survey data to review the adequacy of payment standard levels.
- We committed to tracking Request for Tenancy Approval (RTA) that failed due to 40% rent burden limit.
- We track on an ongoing basis rental information on cases where apartment units became ineligible for program participation due to rent being too high for client. We plan to compile this information and analyze to determine if higher payment standards are necessary.

4. Program Participants don't always report housing discrimination that they may encounter or are unwilling to take further action when they do report housing discrimination (they may complain about encountering discrimination but are unwilling to take action).

Goal: Develop further strategies to ensure program participants consider reporting housing discrimination and are properly informed regarding their rights under fair housing laws.

Progress:

- We ensure that updated fair housing material is routinely gathered and being provided to program participants during orientation.
- We developed office procedures to have program staff record basic facts surrounding any reported incident of housing discrimination (whether further action was taken or not taken).
- We developed a system where reported incidents of housing discrimination are gathered and reviewed routinely to identify patterns or possible follow-up action.

5. Improve fair housing compliant process including a full understanding of appropriate complaint referral procedures.

Goal: Develop further strategies to improve the fair housing complaint process and referral procedures:

Progress:

- Assign a specific staff person to coordinate fair housing activities.
- Develop a formal process for referring fair housing complaints to appropriate agencies.
- Commit to conducting an analysis of the impediments to fair housing choice on an annual basis and include member(s) of the resident advisory board in the process.

6. The general lack of affordable rental units in the market creates impediments to fair housing choice, particularly for those families searching for larger size apartment units.

Goal: Develop strategies to counteract the general lack of affordable rental units for families searching for larger size units:

Progress:

- We affirmatively marketed the Section 8 tenant-based program to rental property owners.
- We disseminated information regarding the Section 8 program to rental property owners.

7. The analysis of impediments to fair housing choice could benefit from greater resident participation.

Goal: Conduct additional outreach to program participants to elicit interest in the resident advisory board and participation in the analysis to impediments to fair housing choice.

Progress:

- Develop a resident advisory board (RAB) handout or brochure to explain the purpose of the resident advisory board and a signed-up sheet for those interested in participating.
- Provide the RAB handout to new admissions.
- Provide the RAB handout to program participants during re-certifications.