Chapter 2

FAIR HOUSING AND EQUAL OPPORTUNITY

INTRODUCTION

This chapter explains the laws and HUD regulations requiring DMMHA to affirmatively further civil rights and fair housing in all federally-assisted housing programs. The letter and spirit of these laws are implemented through consistent policy and procedures. The responsibility to further nondiscrimination pertains to all areas of DMMHA’s housing choice voucher (HCV) operations.

This chapter describes HUD regulations and DMMHA policies related to these topics in four parts:

- **Part I: Nondiscrimination.** This part presents the body of laws and regulations governing the responsibilities of DMMHA regarding nondiscrimination.
- **Part II: Policies Related to Persons with Disabilities.** This part contains DMMHA’s reasonable accommodation policy.
- **Part III: Affirmatively Furthering Fair Housing.** This includes DMMHA’s Affirmatively Furthering Fair Housing policies and practices.
- **Part IV: Prohibition of Discrimination Against Limited English Proficiency Persons.** This part details the obligations of DMMHA to ensure meaningful access to the HCV program and its activities by persons with limited English proficiency (LEP). This chapter includes DMMHA’s LEP four factor analysis and LEP plan.
PART I: NONDISCRIMINATION

2-I.A. OVERVIEW
Federal laws require PHAs to treat all applicants and tenant families equally, providing the same quality of service, regardless of family characteristics and background. Federal law prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, age, familial status, and disability. In addition, HUD regulations provide for additional protections regarding sexual orientation, gender identity, and marital status. The DMMHA 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)
- The Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, published in the Federal Register February 3, 2012, and further clarified in Notice PIH 2014-20
- Violence Against Women Reauthorization Act of 2013 (VAWA)

2-I.B. NONDISCRIMINATION
Federal regulations prohibit discrimination against certain protected classes. State and local requirements, as well as DMMHA policies, can prohibit discrimination against additional classes of people.

DMMHA shall not discriminate because of race, color, sex, creed, national origin, age, disability, gender, gender identity, sexual orientation, familial status or religion.

Discrimination Complaints
If an incident of discrimination is alleged, the individual alleging the occurrence of discrimination will be advised of his/her rights under Federal, State and Local laws, to file a complaint. If the individual chooses to file a discrimination complaint under Title VIII, the DMMHA will provide assistance in the completion of a Form HUD-903 or refer the individual to an appropriate office where assistance may be obtained (i.e. Iowa Legal Aid, Iowa Civil Rights Commission or to HUD). Posted in the DMMHA Administrative Office for public information and inspection is a copy of the HUD Housing Discrimination Complaint Form HUD-903, including the address of the Des Moines HUD Regional Office.
To avoid the appearance of a conflict of interest, complaints of discrimination shall not be investigated by the Des Moines Human Rights Commission.

2-I.C. SERVICES AND PRACTICES PROVIDED BY DMMHA REGARDING NONDISCRIMINATION

1. All families selected for participation in the Agency's assisted housing programs will receive information concerning State and Federal Fair Housing Laws. “Fair Housing” brochure, and Form HUD-903 are distributed to families at briefing sessions. The procedures for filing a Housing Discrimination Complaint—will be explained to all families during a program briefing session.

2. Posters describing housing rights are prominently displayed in common areas of the DMMHA offices.

3. Staff refers aggrieved parties to the Iowa Civil Rights Commission.

4. Presentations are made by representatives from area Fair Housing Agencies.

5. Agency staff is responsible to assist applicants and participants to complete Form HUD-903.

6. Staff receives training as available through the Human Rights Commission, Iowa Civil Rights Commission and the Department of Housing and Urban Development (HUD).
PART II: POLICIES RELATED TO PERSONS WITH DISABILITIES

2-II.A. DMMHA REASONABLE ACCOMMODATION POLICY
DMMHA will ensure that persons with disabilities have equal access to DMMHA programs and services. Individuals with disabilities may make a request for an exception to DMMHA policies verbally or in writing if the person feels such an exception would remove a barrier from fully participating in DMMHA programs.

DMMHA complies with the Americans with Disabilities Act, the Fair Housing Act, and Section 504 of the Rehabilitation Act of 1973, and the publication thereof by HUD (FHEO notice 2013-01) regarding service and assistance animals for program participants.

As a result of PIH Notice 2013-03, Temporary Compliance Assistance, the DMMHA will establish a payment standard of not more than 120% of the Fair Market Rent without HUD approval as a reasonable accommodation until March of 2014, unless extended by the U.S. Department of Housing and Urban Development (HUD).

2-II.B. UTILIZATION OF LOCAL FAIR HOUSING ORGANIZATION OR ORGANIZATION SERVING PERSONS WITH DISABILITIES
1. Referrals to the agencies providing assistance will be made as follows:
   a. Department of Housing and Urban Development
   b. Iowa Civil Rights Commission
   c. United Way 2-1-1

2. DMMHA does not subcontract with any local Fair Housing Organization or an organization serving the disabled; however, the Agency will consult with and/or solicit the advice and/or assistance of qualified agencies, in addition to those listed in #1 above, to effectively deliver services to the disabled. These agencies include, but are not necessarily limited to:
   a. Arthritis Foundation Iowa Division
   b. Behavioral Technologies
   c. MOSAIC
   d. Central Iowa Center for Independent Living (CICIL)
   e. Children’s Habilitation Center (Childserve)
   f. City of Des Moines Access Advisory Board
   g. Department of Human Rights
   h. Easter Seal Society of Iowa, Inc.
   i. Iowa Paralyzed Veterans of America
   j. Disability Rights Iowa
   k. Link Associates
   l. Lutheran Family Services of Iowa
   n. Des Moines Area Regional Transit (DART) Authority
   o. National Multiple Sclerosis Society
   p. Muscular Dystrophy Iowa Chapter
   q. Younkers Rehabilitation Center
2-11.C PROGRAM ACCESSIBILITY FOR PERSONS WITH HEARING OR VISION IMPAIRMENTS

HUD regulations require DMMHA to ensure that persons with disabilities related to hearing and vision have reasonable access to the DMMHA’s programs and services [24 CFR 8.6].

To meet the needs of persons with hearing impairments, TTD/TTY (text telephone display / teletype) communication, sign language interpretation services and Relay Iowa communication will be available.

To meet the needs of persons with vision impairments, large-print and audio versions of key program documents will be made available upon request. When visual aids are used in public meetings or presentations, or in meetings with staff, one-on-one assistance will be provided upon request.

Additional examples of alternative forms of communication are sign language interpretation; having material explained orally by staff; or having a third party representative (a friend, relative or advocate over the age of 18, named by the applicant) to receive, interpret and explain housing materials and be present at all meetings.
PART III: AFFIRMATIVELY FURTHERING FAIR HOUSING

2-III.A. Non-Elderly Disabled Voucher Program
Actions to be taken to further fair housing for non-elderly disabled persons and families:

1. The DMMHA will apply for housing choice vouchers designated for non-elderly disabled persons.
2. If non-elderly disabled designated vouchers are received, the DMMHA will identify non-elderly disabled families on its waiting list that would qualify for the non-elderly disabled vouchers.
3. The DMMHA will inform non-elderly disabled persons how to file a fair housing complaint. This will include providing at the time of a briefing session, the “Fair Housing” brochure HUD-1686-1-FHEO and the “Housing Discrimination Complaint” Form HUD-903. Both forms include the Housing Discrimination Hotline toll free number. State and Federal Fair Housing Laws, and the procedure for filing a Housing Discrimination Complaint will be explained to all families during a program briefing session. In addition, posters describing housing rights are prominently displayed in DMMHA offices.

2-III.B Housing Choice Voucher Programs

The Des Moines Municipal Housing Agency (DMMHA) promotes non-discrimination and fair and equal housing opportunities for all. In an ongoing effort to provide services and activities in a nondiscriminatory manner, a strong commitment to Affirmatively Furthering Fair Housing has been made by DMMHA. This strong commitment is being satisfied through DMMHA’s practice to promote Affirmatively Furthering Fair Housing and also in the numerous written policies, principles, guidelines, and most importantly, the practices of DMMHA.

In order to promote Fair Housing rights for Housing Choice Voucher clients, it is the policy of DMMHA 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. The DMMHA will not deny any family or individual the equal opportunity to apply for, or receive assistance under the Housing Choice Voucher Program on the basis of race, color, sex, gender, gender identity, religion, creed, national or ethnic origin, age, familial or marital status, disability, or sexual orientation.

The DMMHA will take the following reasonable steps to affirmatively further fair housing in the Housing Choice Voucher Program how DMMHA will maintain records of those steps, and the impacts these steps have made.

1. DMMHA will advertise widely in the community for the all vacant position(s) when they become available.
   - All DMMHA staff are City of Des Moines employees, as such, vacant positions are advertised fairly and broadly by the City of Des Moines Human Resources Department. The City of Des Moines posts job openings on the City web site for
all interested parties to view. The City of Des Moines also advertises open positions in local newspapers to reach potential applicants who might not have access to computers. The City of Des Moines Human Resources Department maintains records and analyzes the effectiveness of the City of Des Moines’s recruitment efforts.

2. DMMHA will market the Housing Choice Voucher programs to all potential participants without regard to race, color, religion, creed, age, gender, sexual orientation, gender identity, sex, disability, familial status or national origin including persons with disabilities and persons with limited English proficiency. (DMMHA’s full Marketing Plan is Exhibit 4-1 of this Plan)
   a. DMMHA markets the availability of the Housing Choice Voucher Programs by completing presentations regarding the Housing Choice Voucher programs to the Polk County Housing Continuum (PCHC). The PCHC is made up of numerous community support service providers that can refer families to the Housing Choice Voucher programs.
   b. DMMHA markets the availability of the Housing Choice Voucher programs to numerous community service agencies.
   c. The DMMHA annually conducts a four factor analysis with regards to limited English proficiency in an effort to better serve Housing Choice Voucher applicants and participants with limited English proficiency. The DMMHA will continue to monitor the potential and current resident pool to determine which vital documents to translate to make the Housing Choice Voucher programs more accessible to non-English speaking clients.
   d. The DMMHA utilizes the “I Speak” cards to assist potential and current Housing Choice Voucher program participants needing translation services to access the programs.
   e. DMMHA utilizes the Language Line and interpreters, at no cost to potential and current Housing Choice Voucher applicants and participants needing translation services. DMMHA logs the needed language of applicants and participants who use the Language Line and interpreters and reviews this log information when analyzing data for the Agency’s LEP Plan.

The DMMHA permits LEP persons to use an interpreter of his/her own choosing (whether a professional interpreter, family member, or friend over the age of 18, after the conditions outlined below are met) in place of, or as a supplement to, the Language Line interpretation services offered by DMMHA.

3. DMMHA ensures that all buildings and communications that facilitate applications and service delivery are accessible to persons with disabilities. If requested, Housing Choice Voucher services can be provided at other locations as well.
   a. It is the intent of the DMMHA that no Housing Choice Voucher potential applicant or participant with a disability be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because the DMMHA’s facilities are inaccessible to or unusable by persons with disabilities.
DMMHA’s facilities are accessible to persons with physical disabilities. DMMHA bi-annually completes a Uniform Federal Accessibility Standards (UFAS) on-site review checklist for administrative offices and for any other space used by DMMHA to assure spaces used by Housing Choice Voucher participants are accessible to persons with disabilities. These annual checklists are saved both electronically and in DMMHA’s 504 Notebook.

b. The DMMHA provides accommodations for applicants and participants who are unable to come into the office by mailing documents when necessary to assure access to services.

c. Accessibility for the hearing impaired is provided by the Relay Iowa telephone service provider. DMMHA also utilizes a TDD system if necessary. DMMHA agency letterhead assures persons needing this communication system know of the TDD availability.

4. DMMHA staff provides information and fair housing referrals to fair housing agencies.
   a. All families selected for participation in the Agency's assisted housing programs will receive information concerning State and Federal Fair Housing Laws. “Fair Housing” brochure and Form HUD-903 are distributed to families at the briefing session. The process for filing a Housing Discrimination Complaint will be explained to all families during the briefing session as well.
   b. DMMHA provides Federal/State/local brochures to Housing Choice Voucher applicants and participants regarding unlawful discrimination upon request.
   c. If fair housing referrals are made by the DMMHA staff, such referrals are noted in each applicant or participant file.

5. DMMHA informs participants of how to file a fair housing complaint.
   - The DMMHA posts the Office of Fair Housing and Equal Opportunity’s (FHEO’s) fair housing posters in the reception area of the Administrative office
   - DMMHA ensures that new program participants receive training and information on rights and remedies available under federal, state and local fair housing and civil rights laws by providing the “Fair Housing” brochure HUD-1686-1-FHEO and the “Housing Discrimination Complaint” Form HUD-903. Both forms include the Housing Discrimination Hotline toll free number. If more information/training is necessary, program participants will be referred to agencies listed in Chapter II.2.B of this Chapter.
   - DMMHA staff inform all new participants in the Housing Choice Voucher Program and upon request participants on how to file a fair housing complaint which includes the provision of the toll free number for the Housing Discrimination Hotline (1-800-669-9777) and the Federal Information Relay Service (1-800-887-8339.)
   - Posters describing housing rights are prominently displayed in DMMHA offices.

6. The Housing Choice Voucher programs promote housing-related opportunities that overcome the effects of past discrimination because of race, color, national origin, religion, sex, disability, and familial status.
DMMHA staff are informed of the importance of affirmatively furthering fair housing and providing equal opportunity to all households. Staff attends local fair housing update trainings to keep current with new developments.

Housing Choice Voucher Program participants shall be provided information on housing opportunities available through the region which will enable the participant the opportunity to be closer to work or school; provide for economic, cultural, racial and ethnic diversity with lower poverty rates, high school drop-out rates and/or greater access to essential goods and services; and how to access such opportunities through support organizations in the area.

Housing Choice Voucher Program participants shall be provided information and explanation on the advantages of moving to an area that does not have a high concentration of poverty.

Identified Impediments to Fair Housing Choice
The above listed steps taken to affirmatively further fair housing in the Housing Choice Voucher Program help overcome the following impediments to fair housing choice identified in the “Greater Des Moines Regional Analysis of Impediments to Fair Housing Choice”:

1. Impediment Identified: Availability of Affordable Housing Options

   Response: The DMMHA has increased housing options over the past several years by applying for a receiving funding for programs targeted to special populations such as the Veterans Administration Supportive Housing Program, Family Unification Program, Non-Elderly Disabled Program, and Project Based Voucher Program.

   The DMMHA continues to consider affordable housing resources in the community such as mixed-finance housing and pursues housing resources other than Public Housing and Section 8 tenant-based assistance as they become available.


   Response: The DMMHA provides all Section 8 Voucher Holders and Property Owners with information regarding fair housing laws, rights and processes.

3. Impediment Identified: Changing Demographics.

   Response: The DMMHA provides equal access to programs and services, and marketing of the Housing Choice Voucher Program is conducted in a manner without regard to race, color, religion, creed, age, gender identity, sexual orientation, disability, familial status or national origin including persons with disabilities and persons with limited English proficiency.

4. Impediment Identified: Landlord Screening Requirements – landlords are increasingly using tenant selection criteria that result in exclusion of certain populations like seniors, disabled population, and low-income individuals.
Response: The DMMHA has an owner packet that is given to potential property owners that contains information regarding fair housing. The owner packet is also available online at [www.dmgov.org](http://www.dmgov.org) under the Housing Services Department tab/Section8/Landlord Information Packet.

5. Impediment Identified: Homelessness.

Response: In an effort to assist the homeless population with permanent housing options, the DMMHA administers 50 Project Based Vouchers (PBV). Twelve of the PBV units are located at the YMCA Supportive Service Campus. Thirty-eight of the PBV units are located at Central Iowa Shelter and Services. DMMHA also implemented a Shelter Plus Care Preference. The Shelter Plus Care Program provides services to chronically homeless individuals with disabilities. DMMHA also administers the Veterans Administrative Supportive Housing (VASH) program which provides rental assistance to 165 homeless Veterans. The DMMHA also administers the Family Unification Program (FUP) in conjunction with the Iowa Department of Human Services to provide assistance to homeless families re-uniting with their children and homeless youth aging out of foster care.

### 2-III.C Family Unification Program (FUP)

**Actions to be taken to further fair housing for families and youth involved with the foster care system:**

1. The DMMHA applied for and received 100 Family Unification Program Vouchers.

The DMMHA will take the following steps to affirmatively further fair housing for classes protected under the Fair Housing Act in regards to FUP vouchers:

   a. Identify and ensure certification of FUP eligible families and youth that may be on the DMMHA waiting list and ensure the family or youth maintain their original position on the waiting list after certification.

   b. Appropriately place all FUP eligible families and youth referred from the Iowa Department of Human Services on the Family Unification Program waiting list in order of first come, first served.

   c. Inform applicants how to file a fair housing complaint which will include the provision of the toll free number for the Housing Discrimination Hotline (1-800-669-9777) and the Federal Information Relay Service (1-800-887-8339.) DMMHA will provide at the time of a briefing session, the “Fair Housing” brochure HUD-1686-1-FHEO and the “Housing Discrimination Complaint” Form HUD-903. Both forms include the Housing Discrimination Hotline toll free number. State and Federal Fair Housing Laws, and the procedure for filing a Housing Discrimination Complaint will be explained to all families during a program briefing session. In addition, posters describing housing rights are prominently displayed in DMMHA offices.
d. Facilitate effective communication with applicants, beneficiaries and members of the public through practices which ensure that interested persons (including those with impaired vision or hearing) can obtain information concerning the FUP Program, including but not limited to utilization of TDD/TTY equipment, providing key FUP materials in languages appropriate to the client base upon request, and taking reasonable steps to provide or allow for interpreters as needed.

2. DMMHA will comply with the affirmatively furthering fair housing requirements of 24 CFR Section 903.7(o) by doing the following:
   a. Examining DMMHA programs and proposed programs to ensure compliance with applicable fair housing laws.
   b. Identifying any impediments to fair housing choice within these programs, if any.
   c. Addressing those impediments in a reasonable fashion in view of the resources available.
   d. Working with local entities to implement any of the entities initiatives to affirmatively further fair housing that require DMMHA involvement.
   e. Maintaining records reflecting any and all appropriate analyses and actions.

- This information is also addressed in DMMHA’s Marketing Plan (Exhibit 4-1 in Chapter 4 of this Plan) and Limited English Proficiency Plan (Part IV of Chapter 2 of this Plan).
PART IV: IMPROVING ACCESS TO SERVICES FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

2-IV.A. OVERVIEW

The DMMHA will take affirmative steps to communicate with people who need services or information in a language other than English. Limited English Proficiency (LEP) persons are defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. For the purposes of this Administrative Plan, LEP persons are Section 8 applicants and participant families.

2-IV.B. DMMHA’S LIMITED ENGLISH PROFICIENCY PLAN

The DMMHA has established the following Limited English Proficiency plan to ensure compliance with HUD’s guidance and Executive Order 13166 issued by President Clinton in 2000 and subsequent guidance under Title VI of the Civil Rights Act of 1964. Under HUD’s guidance, DMMHA must take reasonable steps to ensure meaningful access to its programs and activities by persons with Limited English Proficiency (LEP).

ASSESSING NEED FOR PROGRAM ACCESS:

The DMMHA will assess the following four factors in determining the need for program access for person of LEP:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program(s);
2. The frequency with which LEP persons come into contact with the program(s);
3. The nature and importance of the program, activity, or service provided by the program to people’s lives; and
4. The resources available to the program/recipient and costs.

SAFE HARBORS

In accordance with HUD safe harbors for LEP, the DMMHA will translate written documents for groups that are at least 5% of the population eligible or 1,000 persons, whichever is less.

If there are fewer than 50 persons in a language group that reaches the 5% trigger above, the DMMHA does not translate the vital written materials, but provides written notice in the primary language of the LEP group of the right to receive competent oral interpretation of those written materials, free of cost.

Document Translation

a. The DMMHA has available all translated documents that have been made available by the U.S. Department of Housing and Urban Development (HUD).

b. As necessary per the results of the above analysis, the DMMHA may continue to offer documents in other languages as the analysis above reveals is necessary and/or upon a reasonable request from the Agency’s clients or service providers serving our mutual clients.

c. The DMMHA will evaluate the need for posting Waiting List Openings and other pertinent announcements in the most common languages encountered.
CURRENT RESOURCES OFFERED:
The DMMHA currently offers the following resources to ensure access to LEP persons:

1. Oral Interpretation Service – the DMMHA offers the Language Line Interpretation Service – if there is a non-English speaking individual that comes into the office, staff show them the brochure for the Language Line Interpretation Service and have them select the language that they understand (the languages are written in both the native language and in English). The staff member calls the Language Interpretation Service and asks for the appropriate interpreter as pointed out by the client. Flyers offering the Language Line Interpretation Service are posted in the Administrative Offices, have been mailed to all current residents/participants and are included in the briefing packets for both Housing Programs.

2. DMMHA uses local translation companies for in person translation services when necessary.

3. The DMMHA works closely with the Des Moines Public Schools Bilingual Family Liaisons.

4. Bureau Refugee Services – the DMMHA works closely with the Bureau of Refugee Services within our jurisdiction.

5. Refugee Alliance of Central Iowa- DMMHA attends meetings and participates in committee activities

6. The DMMHA permits LEP persons to use an interpreter of his/her own choosing (whether a professional interpreter, family member, or friend over the age of 18,) in place of, or as a supplement to, the Language Line interpretation services offered by DMMHA.

STEPS TO ENSURE ACCESS TO LEP PERSONS/PROVIDING ONGOING NOTICE TO LEP PERSONS

1. Continue to display posters and a table stand offering the Language Line Interpretation Service in the Administrative Offices.

2. Continue to include Language Line Interpretation Service flyers in the briefing packets for both Housing Programs.

3. Continue to utilize local translation companies for in person interpretation.

4. Continue to work closely with the Bureau of Refugee Services within our jurisdiction.

5. Continue to work with the Refugee Alliance of Central Iowa

6. Continue to work with the Des Moines Public Schools Bilingual Liaisons

7. If an interpreter is selected by the applicant/participant in lieu of using the Language Line, the DMMHA will provide courtesy copies of written correspondence to the chosen translator of an LEP applicant or participant upon request of the applicant or participant. Oral requests will also be accepted. Staff documentation of oral requests will be maintained in the applicant/tenant file.

STAFF TRAINING
The DMMHA will conduct staff training periodically either in a group setting or by written
communication with staff. The following are the items to be reviewed at each training:

1. Types of language services available;
2. How staff can obtain those services;
3. How to respond to LEP callers;
4. How to respond to written communications from LEP persons; and
5. How to respond to LEP persons who have in-person contact with staff

MONITORING AND UPDATING THE LEP PLAN

The DMMHA will monitor the effectiveness of the LEP Plan by assessing changes in the following areas on an annual basis:

1. Current LEP populations in the DMMHA jurisdiction by reviewing the U.S. Census information;
2. Frequency of encounters with LEP language groups by recording the language spoken at home in the DMMHA’s database and reviewing reports based on this information;
3. Nature and importance of activities to LEP persons by continuing to conduct outreach to service providers to ensure awareness and access to DMMHA programs and services;
4. Availability of resources, including technological advances and sources of additional resources, and the costs imposed by researching translation software and other technological advances the DMMHA is made aware of via e-mail notification, newsletters, web sites, etc.;
5. Whether existing assistance is meeting the needs of the LEP persons, by reviewing the annual use of the language line and any requests for translated materials made by clients and/or service providers;
6. Whether staff knows and understands the LEP plan and how to implement it by conducting periodic training; and
7. Whether the identified sources for assistance are still available and viable, by contacting any sources not frequently in contact with the Agency to determine if they are still in operation and providing the same services to the community.

2-IV.C. DMMHA’S LEP FOUR FACTOR ANALYSIS

FACTOR ONE- Number or proportion of LEP persons eligible to be served or likely to be encountered by the program(s):

Source: 2018 American Community Survey Demographic and Housing 1 Year Estimates – Polk County Iowa
Demographic and Housing Estimates:
Total Population = 487,204
Percent Hispanic/Latino Population = 8.5%
Percent Asian = 4.9%
Percent Hawaiian or Pacific Islander = .2%
Percent American Indian/Alaskan native = 0.1%

Source: 2018 American Community Survey – Polk County Iowa – Selected Social
Characteristics.
Characteristics of People Who Speak a Language other than English at Home:
Total Population = 189,546
Speak English Less than Very Well:
Spanish = 1.9% or 8,426 persons
Other Indo European languages = 0.9% or 3,902 persons
Asian and Pacific Islander Languages = 1.6% or 7,217 persons
Other languages = 1.2% or 5,580 persons

With the exclusion of Spanish, there is not sufficient information about the remaining languages to determine the number of persons that speak a certain type of language. For example, other Indo European languages could include languages such as Indian, Hindu, and several other languages. Data is not available for each specific language, therefore, the DMMHA is unable to determine the percentage of the number of persons who speak such languages.

FACTOR TWO - The frequency in which LEP persons come into contact with the program(s):

The DMMHA’s office hours are Monday through Friday from 8 a.m. to 5 p.m., excluding City recognized holidays.

In analyzing current participants in the Section 8 Housing Program, the following statistics are the percent of residents that speak a language other than English as their home language:

Total of 2937 Participants:

<table>
<thead>
<tr>
<th>Language</th>
<th>Percentage</th>
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<tbody>
<tr>
<td>Albanian</td>
<td>.0%</td>
</tr>
<tr>
<td>Arabic</td>
<td>1.15%</td>
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<tr>
<td>Bosnian</td>
<td>1.35%</td>
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<tr>
<td>Burmese</td>
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<tr>
<td>Cantonese</td>
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<tr>
<td>Chinese</td>
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<tr>
<td>Denka</td>
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<td>English</td>
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<tr>
<td>Farsi</td>
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<tr>
<td>French</td>
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<td>Grebo</td>
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<td>Khmer</td>
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<td>Lao</td>
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<tr>
<td>Nepali</td>
<td>.07%</td>
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<td>.03%</td>
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<tr>
<td>Ogani</td>
<td>.03%</td>
</tr>
<tr>
<td>Persian</td>
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<tr>
<td>Poshto</td>
<td>.03%</td>
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<tr>
<td>Russian</td>
<td>.14%</td>
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</table>
In analyzing current applicants in the Section 8 Housing Program the following statistics are the percent of residents that speak a language other than English as their home language:

Total of 916 Applicants

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<th>Language</th>
<th>Percentage</th>
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<td>Cantonese</td>
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<tr>
<td>French</td>
<td>.00%</td>
</tr>
<tr>
<td>Grebo</td>
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FACTOR THREE- The nature and importance of the Program, activity or service provided by the program to people’s lives:

Housing plays a critical role in maintaining quality of life. The DMMHA is committed to ensuring access to safe, sanitary and affordable housing and the facilitation of self-sufficiency. The DMMHA conducts extensive outreach activities to service providers and various other agencies throughout the community to ensure continued awareness of the Agency’s programs and services.

FACTOR FOUR- The resources available to the program/recipient and costs:

The DMMHA currently offers the following resources to ensure access to LEP persons:

1. Oral Interpretation Service – the DMMHA offers the Language Line Interpretation Service – if there is a non-English speaking individual that comes into the office, staff show them the brochure for the Language Line Interpretation Service and have them select the language that they understand (the languages are written in both the native language and in English). The staff member calls the Language Interpretation Service and asks for the appropriate interpreter as pointed out by the client. Flyers offering the Language Line Interpretation Service are posted in the Administrative Offices, have been mailed to all current residents/participants and are included in the briefing packets for both Housing Programs.

2. DMMHA also uses local translation companies for in person translation services when necessary.

3. Refugee Alliance of Central Iowa

4. Bureau Refugee Services – the DMMHA works closely with the Bureau of Refugee Services within our jurisdiction.

5. DMMHA works closely with the Des Moines Public Schools Bilingual Liaisons

6. Document translation through the Language Line Interpretation Service is available through the City of Des Moines’ current contract with this company. The cost of each translation will vary based on the document length and complexity.

7. The DMMHA permits LEP persons to use an interpreter of his/her own choosing (whether a professional interpreter, family member, or friend over the age of 18,) in place of, or as a supplement to, the Language Line interpretation services offered by DMMHA.

8. The DMMHA has translated a line, in both Spanish and Bosnian that informs clients that if they need the document translated to contact the person that signed the letter/notice. This line has been added to the Agency letterhead and to the Notices of Lease Termination and Notices to Cure used in the Public Housing Program.

9. DMMHA translates the notification of the opening of the Section 8 Waiting list, into Spanish each time the Section 8 waiting list is opened. The DMMHA will translate the Section 8 pre-application into Spanish, upon request.
10. The DMMHA Inspection Division has implemented a form translated into Bosnian and Spanish that identifies that they are inspectors and are there to conduct the inspection and to let them know if there is anything that the participant would like to have the landlord repair.

11. DMMHA utilizes HUD forms and documents translated by HUD.

FINAL ANALYSIS:
Based on the above analysis, the DMMHA recognizes the Spanish language as the only language to be actively translating at this time. Due to limited financial resources, the DMMHA will continue to offer oral interpretations at no cost to the general population or current participants in the program. The DMMHA will consider translating outreach and application materials, not already translated by HUD, upon request of the general population or current participants if it is determined financially possible to do so. The DMMHA will continue to analyze its internal documents to determine which documents are vital in the administration of the Programs. The DMMHA will also obtain quotes on the most vital documents in order to determine the Agency’s financial capacity to have the documents necessary translated into Spanish.

Documents to be considered for translation into Spanish:
Lease Agreement for PH
Family Obligations (both Programs) - Translated
Pre-application (both Programs)
Application packet of information (Section 8) includes:
   Reasons for Denials
   Informal Review Procedures
Application packet of information (Public Housing) includes:
   Reasons for Denials
   Informal Review Procedures
Relocation Policy Form
Recertification Packet (Section 8)
   Family Break up policy
   Family Obligations – Translated
Recertification Packet (Public Housing)
   Community Service and Self-Sufficiency Certification
   Release of information (payee)
   Family Break-up Policy
   Choice of Rent Form
   Rent Option Fact Sheet
   Financial Hardship Exemption form
   Family Obligations
   Attachment 1 to the Dwelling Lease
Add Family Member form
Reasonable Accommodation Request form
Public Housing Grievance Procedures - Translated