

CITY OF DES MOINES, MUNICIPAL HOUSING AGENCY  
 EQUAL OPPORTUNITY HOUSING PLAN

CITY OF DES MOINES  
 DEPARTMENT OF HOUSING SERVICES  
 100 E. Euclid, Suite 101  
 Des Moines, Polk, Iowa 50313

	0BR	1BR	2BR	3BR	4+BR	TOTAL
Number of Units						29423029
Vouchers Under Lease	63 75	963 1040	1019 992	623 628	109 120	2777 2855
Moderate Rehabilitation		13	1312	2	0	2814

As of 1/8/08

Program Type                      Section 8 Housing Voucher  
 Moderate Rehabilitation

\_\_\_\_\_  
 Signature of Person Submitting Plan

\_\_\_\_\_  
 Date

Name: Chris Johansen

Official Position: Director

Revised 12/9/08

CITY OF DES MOINES, MUNICIPAL HOUSING AGENCY  
EQUAL HOUSING OPPORTUNITY PLAN

OBJECTIVE I. OUTREACH TO LOWER INCOME FAMILIES - ALL PROGRAMS

1. Media to be Utilized:

The Des Moines Municipal Housing Agency has waiting lists of eligible applicants for its Section 8 HAP Programs and is therefore not required to publish the availability of new allocations on programs. If the DMMHA waiting list for any particular program falls below "safe" levels (all applicants could be assisted in a one-year period), the Agency will conduct outreach by advertisements on Employee and Family Resources radio station 99.1 KFMG, in local Shoppers, the Des Moines Register and will use the established outreach mailing (both U.S. Postal Service and electronic mail) list including suburban area service providers. The Agency will follow the procedures set out in the Section 8 Administrative Plan to notify eligible families of the availability of the units and will assign preferences, if applicable, as established in the Plan.

2. Other Suitable Means to be Used to Publicize Programs:

Brochures or flyers are available to describe DMMHA programs and copies of such brochures or flyers will be sent to community centers and service providers which primarily serve low-income neighborhoods. Agency staff participates in the Collaboration for Family Self-Sufficiency, Polk County Housing **Continuum and Homeless Collaboration**, **Affordable Housing and Homeless Partnership**, and several other community agencies. Staff regularly makes presentations and distributes program information, all of which provide access to low-income people through service providers.

3. Group or Groups Less Likely to Apply, If Any:

Concerns have been raised about the under-representation of Native Americans and Hispanics in units and/or assisted through the Agency.

4. Special Outreach to Groups Identified in 3. Above:

DMMHA will provide Spanish language brochures to organizations serving the Hispanic community. At least annually, or upon availability, the Agency will contact the following to inform them of the availability of our programs:

- a. Iowa Bureau of Refugee Services
- b. Hispanic Ministries
- c. Latino Resources, Inc.

- d. Latino Unidos
- e. Hispanic Educational Resources, Inc.
- f. Visitation and St. Peters Churches
- g. Iowa Division of Latino Affairs

The DMMHA works closely with local language interpretation service providers to ensure program access and understanding by persons with Limited English Proficiency (LEP).

The DMMHA has also implemented the Language Line Interpretation service to aid in communications with persons with Limited English Proficiency.

The DMMHA will assess the proportion or number of LEP persons eligible to be served or likely to be encountered by the program and provide, to the extent reasonably possible, access to relevant program materials in other languages as determined necessary by the assessment. Additional procedures for outreach activities for LEP persons are included in the DMMHA LEP Plan (Attachment 1 to this Policy).

5. Special Outreach to Persons Expected to Reside, If Identified in Approved HAP:

Refer to 1. and 2. above. Existing waiting lists, close cooperation with Polk County Social Services, and word of mouth based on the general knowledge of DMMHA programs throughout the community provides for publicizing of program availability to those expected to reside. In addition, the Agency participates in Iowa and National NAHRO, thus other housing agencies serving low-income refer prospective applicants to the Agency.

**OBJECTIVE II. PROMOTING GREATER HOUSING OPPORTUNITIES FOR FAMILIES OUTSIDE AREAS OF LOW-INCOME MINORITY CONCENTRATION**

**ACTION TO BE TAKEN:**

The following items are applicable to the Section 8 Housing programs including Housing Choice Voucher program and Moderate Rehabilitation Programs:

- 1. Media to be Utilized to Notify Owners of the Program:
  - a. Des Moines Register
  - b. Area Shoppers, Including Suburban Area Shoppers
  - c. GoSection8.com website

2. Encouragement of Participation by Owners of Units Outside Low-Income and Minority Areas:

- a. Briefings for owners are conducted in DMMHA Administrative Offices.
- b. The size and history of DMMHA programs provide for incoming calls and correspondence from interested property owners and/or agents. Program information is available and provided on an on-going basis to the Iowa Landlord Association.

Additionally, community contact sources such as the Real Estate Board and community action groups will be utilized and the Agency will continue to pursue increased participation through Cooperative Agreements with suburbs which do not have such an arrangement with the Agency.

3. Actions to Explain Program Requirements Including Equal Opportunity to Owners

For a project other than Section 8 Voucher Housing, a public notice is placed in the news media described in this objective. The notice will explain the program, with particular emphasis on benefits and requirements of the program. This Notice is developed in accordance with HUD guidelines for Fair Housing and includes the Equal Opportunity Logo.

Outreach for the Section 8 Housing Programs is accomplished continually. This is done on an individual basis by telephone and written material in the form of Owner's Information Packets. When requested, the Agency will make group presentations. The Agency is a member of the Iowa Landlords Association, Polk County Housing **Continuum and the Collaboration for Family Self Sufficiency and Homeless Collaboration, Affordable Housing and Homeless Partnership**. Owners will receive information covering State and Federal Fair Housing Laws at Owner Briefing Sessions and information is included in the Owner's Packet.

4. All families selected for participation in the Agency's assisted housing programs will receive information concerning State and Federal Fair Housing Laws. "Fair Housing" brochures and Form HUD-903 are distributed to participating families at briefing sessions. State and Federal Fair Housing Laws, and the procedures 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, and staff refers aggrieved parties to the Des Moines Human Rights Commission and Iowa Civil Rights Commission.

5. Information on General Locations and Characteristics of Neighborhoods and Lists, to be Provided to Certificate and/or Voucher Holders

The Agency's area of operations is community wide, incorporates adjoining suburbs and unincorporated Polk County. In-depth tenant briefing sessions will serve to provide the specific responses to inquiry and questions. A bulletin board at the Administrative Office lists properties known to be available for rent. A map of the community is included in the Family's Briefing Packet and a list of property owner's who have expressed interest in the

program and units are updated weekly. Applicants are encouraged to use local newspapers and shoppers to locate suitable units.

6. Actions to be Taken to Assist Voucher Holders During Housing Search, When Requested

Case Managers will assist those having difficulty finding units, but required assistance beyond the capacity of the Agency will be arranged by referral to appropriate community agencies.

7. Actions Taken to Promote Broadest Geographical Choice in Selection of Units by Voucher Holders

As the Agency's area of operations is community wide, including suburbs and unincorporated Polk County, a broad geographical choice in selection of units is encouraged. The Agency has obtained Cooperation Agreements with suburbs.

8. Geographical Areas in Which City Vouchers May Be Used

The Agency area of operations is the entire City of Des Moines, most suburban communities, and unincorporated areas of Polk County. This aspect is well covered in briefing sessions. Referrals are also made to the Central Iowa Regional Housing Authority which covers the area outside Polk County.

**OBJECTIVE III. ENSURING EQUAL OPPORTUNITY FOR VOUCHER HOLDERS OR TO APPLICANTS TO BE REFERRED TO OWNERS OF VACANT UNITS ASSISTED THROUGH THE MODERATE REHABILITATION PROGRAM**

1. System for Taking, Processing and Filing Applications; Establishing a Waiting List

In referring families to vacant units in the Moderate Rehabilitation Program, the Agency will follow the procedures established in the Agency's Section 8 Administrative Plan.

2. Preference or Priority Categories and Methods for Selection of Applicants to be Referred to Owners of Vacant Moderate Rehabilitation Units

The Agency's priority for selection of applicants for vacant moderate rehabilitation units will be as follows:

- a. Eligible families residing in units assisted under the Moderate Rehabilitation Program who are required to move because their dwelling units have become overcrowded/under-occupied or who have been required to vacate through no fault of their own.
- b. For vacancies in units rehabilitated to provide accessibility, if any, selection of occupants will be those persons or families who are disabled.

- c. Other eligible applicants on the Agency's waiting list, who have one or more Preferences, if applicable, and who have not been notified of the availability of a Voucher.
  - d. A listing of available Moderate Rehabilitation units will be posted on the Agencies bulletin board in the Reception office.
3. When DMMHA is informed of a vacancy or vacancies in Moderate Rehabilitation through turnover, the Agency's Section 8 waiting list may be used to identify eligible participants. They are notified of the vacancy appropriate to their family size and are asked to contact the owner. For the initial contact concerning a vacancy, time on the waiting list, Agency priorities, and Preferences, if applicable, govern our procedure for notification. However, after an eligible family has rejected a unit, the Agency will not repeatedly refer that unit to the family. Instead, the Agency will move through the waiting list of eligible applicants without penalty to those rejecting the unit. Housing Voucher holders will not be referred to vacant Moderate Rehabilitation units.

#### OBJECTIVE IV. PROVISION OF SERVICES AND ASSISTANCE TO FAMILIES WHO BELIEVE THEY HAVE ENCOUNTERED DISCRIMINATION DURING THEIR HOUSING SEARCH

##### 1. Services to be provided in finding a unit under the Housing Program

Assistance in unit locations and selection is provided by staff through tenant briefing sessions as described in the Agency's Section 8 Administrative Plan.

#### ACTIONS TO BE TAKEN:

##### 2. Assistance to be Given to or Applicants Referred to Owners of Vacant Moderate Rehabilitated Units or to Voucher Holders in the Exercise of Their Rights Under Federal, State and/or Local Law and Name of Persons Responsible for Giving Assistance; Training of These Persons:

- 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 briefing sessions. State and Federal Fair Housing Laws, and the procedures 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 and staff refers aggrieved parties to the Des Moines Human Rights Commission and Iowa Civil Rights Commission. Presentations are made by representatives from area Fair Housing Agencies.
- b. Agency staff is responsible to assist applicants and participants.

- c. Staff receives training as available through the Human Rights Commission, Iowa Civil Rights Commission or the Department of Housing and Urban Development.

**OBJECTIVE V. UTILIZATION OF A LOCAL FAIR HOUSING ORGANIZATION OR AN ORGANIZATION SERVING THE DISABLED**

- 1. Referrals to the agencies providing assistance will be made as follows:
  - a. Des Moines Human Rights Commission; or
  - b. Iowa Civil Rights Commission; or
  - c. Department of Housing and Urban Development; or
  - d. The Iowa Legal Aid
  
- 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. Iowa Paralyzed Veterans of America
  - b. City of Des Moines Access Advisory Board
  - c. Department of Human Rights
  - d. MTA Paratransit Advisory Committee
  - e. Iowa Protection and Advocacy Services, Inc.
  - f. Younkers Rehabilitation Center
  - g. National Multiple Sclerosis
  - h. Arthritis Foundation Iowa Division
  - i. Muscular Dystrophy Iowa Chapter
  - j. Easter Seal Society of Iowa, Inc.
  - k. Bethphage Community Services, Inc.
  - l. Children's Habilitation Center (Childserve)
  - n. Central Iowa Center for Independent Living (CICIL)
  - o. Lutheran Family Services of Iowa
  - p. Link Associates
  - q. Behavioral Technologies

Agency maintains separate housing list of accessible rental dwelling units.

**OBJECTIVE VI. PROMOTING EMPLOYMENT OPPORTUNITY IN CITY EMPLOYMENT PRACTICES, VOUCHER PROGRAM, AND MODERATE REHABILITATION PROGRAM**

1. Current and proposed staffing data by position, race/ethnicity, gender and salary:
  - a. This information is further identified and set forth in an Organization Chart approved by the Municipal Housing Governing Board in April, 2004.
  - b. Staff positions, by program and salary level, are set forth in the Agency's approved Operating Budget, Form HUD-5266.

The Agency's Occupancy and Program Enforcement Administrator and Leasing Administrator will continue in the designation as the Voucher Program and Moderate Rehabilitation Program Coordinators. Assisting in the administrative functions will be the Administrative Secretaries, Section 8 Case Managers, and Application Specialists.

Those staff positions associated with or assigned to the Section 8 Housing Choice Voucher and Moderate Rehabilitation Programs, by position, race/ethnicity, gender and salary are:

Director/Caucasian/Male/~~\$101,573~~/**\$98,388**  
Assistant Director/Caucasian/Female/\$87,021  
Accounting Manager/Caucasian/Male/~~\$59,430~~/**\$54,405**  
Occupancy and Program Enforcement Administrator/Caucasian/Female/\$57,471  
Administrative Secretary/Black/Female/\$33,588  
Administrative Secretary/Caucasian/Female/\$32,230  
Administrative Secretary/Caucasian/Female/\$33,588  
Administrative Secretary/Caucasian/Female/\$29,508  
**Accounting Analyst/Asian/Female/\$45,569**  
**Bookkeeper/Asian/Female/\$36,002**  
Bookkeeper/Vacant  
Bookkeeper/Caucasian/Female/\$36,002  
Bookkeeper/Caucasian/Female/\$33,927  
Case Manager/Caucasian/Female/\$40,742  
Case Manager/Caucasian/Female/**\$36,601**/**\$37,160**  
Case Manager/Caucasian/Female/\$40,742  
Case Manager/Caucasian /Female/\$35,987  
Case Manager/Caucasian/Female/\$40,742  
Case Manager/Black/Female/\$39,385  
Case Manager/Caucasian/Female/\$38,557  
Case Manager/Caucasian/Female/\$40,792  
Case Manager/Caucasian/Female/\$35,739  
Case Manager/Black/Male/\$38,557  
Case Manager/**Vacant** /**Caucasian/Female/33,978**

Case Manager/**Vacant** /Caucasian/Female/33,978  
Case Manager/**Vacant** /Caucasian/Female/33,978  
Application Specialist/Asian/Female/\$28,111  
Application Specialist/Black/Female/**\$29,371**/**\$28,159**  
Housing Inspector/Caucasian/Male/\$54,274  
Housing Inspector/Caucasian/Male/\$54,274  
Housing Inspector/Caucasian/Male/\$51,604  
Inspections Supervisor/Caucasian/Male/\$64,882  
Office Manager/Caucasian/Female/\$52,749  
Senior Case Manager/Caucasian/Female/**\$43,418**/**\$49,100**  
Senior Case Manager/Vacant  
Leasing Administrator/Caucasian/Female/\$68,850  
Systems Administrator/Caucasian/Female/\$59,620  
Family Self-Sufficiency Coordinator/Black/Female/\$49,061  
Family Self-Sufficiency Coordinator/Black/Male/\$43,400/**vacant**

2. The City Personnel policies and Affirmative Action Plan applicable to DMMHA are available at the Personnel office, City of Des Moines, 400 Robert D. Ray Drive, Des Moines, Iowa. In the employment of any additional personnel for its various assisted housing programs, the Agency will adhere to the Non-Discrimination and Affirmative Action principles set forth in the referenced documents.

#### OBJECTIVE VII. EQUAL OPPORTUNITY FOR PARTICIPATION IN THE MODERATE REHABILITATION PROGRAM BY MINORITY AND SECTION 3 BUSINESSES

1. Actions to be Taken in Developing and Maintaining Lists of Local Minority and Section 3 Businesses:

Not Applicable: The DMMHA does not anticipate any future opportunity for the use of contractors for the Moderate Rehabilitation Programs.

AMENDED AND APPROVED by the Board of Commissioners this 10th day of April, 1990.

AMENDED AND APPROVED by the Board of Commissioners this 14th day of August, 1990.

AMENDED AND APPROVED by the Board of Commissioners this 10th day of June, 1992.

AMENDED AND APPROVED by the City Council this 3rd day of June, 1996.

AMENDED AND APPROVED by the City Council this 3rd day of August, 1998.

AMENDED AND APPROVED by the Governing Board this 28<sup>th</sup> day of March, 2005

AMENDED AND APPROVE by the Governing Board this 20<sup>th</sup> day of March, 2006.

AMENDED AND APPROVED by the Governing Board this 26<sup>th</sup> day of March, 2007

AMENDED AND APPROVED by the Governing Board this 24<sup>th</sup> day of March, 2008

**AMENDED AND APPROVED by the Governing Board this \_\_\_\_ day of \_\_\_\_, 2009**

## **LIMITED ENGLISH PROFICIENCY PLAN**

### **Section 8 and Public Housing Programs**

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, PHA's must take reasonable steps to ensure meaningful access to their programs and activities by person 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.
- 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 Opening 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. The Language Line is a two line (head set) system so both the staff member and the client can be on the line at the same time. 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. Bureau Refugee Services – the DMMHA works closely with the Bureau of Refugee Services within our jurisdiction.
3. Resident Participation funds are available to be used for document translation, if deemed necessary.
4. The City of Des Moines has developed a list of all City employees that speak, write, or read a language other than English fluently. The DMMHA is a City Department and may contact employees on this list for interpretation services as their schedule permits. The list is available on the City of Des Moines web-site (portal).
5. The DMMHA permits LEP persons to use an interpreter of their own choosing at their own expense (whether a professional interpreter, family member, or friend) in place of or as a supplement to the free language services expressly 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 work closely with the Bureau of Refugee Services within our jurisdiction.

### **STAFF TRAINING**

The DMMHA will conduct staff training at least once annually, 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;
5. How to respond to LEP persons who have in-person contact with staff; and

### **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;

2. Frequency of encounters with LEP language groups;
3. Nature and importance of activities to LEP persons;
4. Availability of resources, including technological advances and sources of additional resources, and the costs imposed;
5. Whether existing assistance is meeting the needs of the LEP persons;
6. Whether staff knows and understands the LEP plan and how to implement it; and
7. Whether the identified sources for assistance are still available and viable.