

NSP Fair Housing Efforts

The following directions for meeting Fair Housing Act requirements are given to all recipients of NSP funding:

- NSP grantees must comply with nondiscrimination and equal opportunity laws including the Fair Housing Act; Executive Orders 11063, 11246, 11625, 12432 and 12138; Title VI of the Civil Rights Act of 1964; the Age Discrimination Act of 1975; Section 504 of the Rehabilitation Act of 1973; and Section 3 of the Housing and Urban Development Act of 1968. These laws ensure that your agency does not discriminate in the provision of housing and services on the basis of race, color, religion, sex, age, national origin, disability or familial status.
- The Fair Housing Act and Executive Order 11063 prohibit discrimination in housing on the basis of race, color, religion, sex, handicap, familial status or national origin. This law also requires that you administer your programs and activities relating to housing in a manner that affirmatively furthers fair housing. First, you must display both the state and federal fair housing posters within your office and shelter facilities. These can be obtained from the Louisville HUD office by calling (502) 582-5250. Second, DLG suggests that you review and keep on file a copy of the Impediments to Fair Housing Study and develop or use existing fair housing materials to educate your staff, clients and others about fair housing.
- Executive Order 11246 prohibits discrimination on the basis of race, color, religion, sex or national origin in all phases of employment. In order to comply, your agency should have personnel policies that clearly outline hiring, training and promotion procedures and contain a nondiscrimination clause that ensures that all persons are treated fairly by your agency in employment opportunities. All NSP subcontracts in excess of \$10,000 should incorporate the equal opportunity clause as well. An Equal Employment Opportunity poster must be displayed in a prominent place within your office.
- The Age Discrimination Act of 1975 prohibits age discrimination in programs receiving federal funds. In order to comply, your agency should add a nondiscrimination clause to your personnel policies, recruitment and informational materials which ensures that all persons regardless of age are treated fairly by your agency.
- In order to comply with Title VI, your agency must adopt a Civil Rights Plan ensuring that no person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any program or activity for which the applicant receives federal financial assistance. This plan must be approved by DLG. If you have a plan that has been approved by Kentucky Housing Corporation, you may submit your Title VI approval letter in lieu of sending DLG your plan.
- To comply with Executive Orders 11625, 12432 and 12138, you must establish comprehensive and ongoing procedures that utilize all available and appropriate public and private sector local resources to encourage participation by businesses owned and operated by members of minority groups and women. These procedures should be included in your agency's procurement procedures. If persons of any race, color, religion, sex, age, national origin, familial status or handicap who may qualify for assistance are unlikely to be reached, you must also establish procedures to ensure that they are made aware of your services. You can do this by contacting minority business groups listed in the purchasing guide to be provided at the NSP training.

- Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on handicap in programs receiving federal funds. Regardless of agency size, your personnel policies and program procedures should include grievance procedures for disability related discrimination complaints. Recruitment and informational material should include a nondiscrimination statement that includes disability. Your agency should provide a Telecommunications Device for the Deaf (TDD) service for the hearing-impaired. This can be provided through KHC for a fee of \$10. Complete the attached application for TDD service (page 3-40) and return to KHC. Then be sure to include the TDD number on all materials where your phone number is given. You must also complete the 504 Self-Evaluation with the input of a local disabled individual or advocate.
- If your agency is not in compliance with any area, you should take immediate corrective action, develop a transition plan and time line to reach compliance or document how reaching compliance would be an undue burden for your organization.
- If your agency employs 15 or more people, you must designate a 504 coordinator and publish his/her name in the local newspaper along with the attached public notice after you have come into compliance with Section 504.
- Section 3 of the Housing and Urban Development Act of 1968 requires that, to the greatest extent feasible, opportunities for training and employment that arise through HUD-financed projects are given to lower-income residents and businesses of the project area.