



PHA Plan Elements (24 CFR 903.07) Plan Element 10

Civil Rights Certification. *A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.*

A Section 504 and Title VI Compliance Review was conducted by FHEO in June 2006 to evaluate the policies, procedures, and practices of the Housing Authority of the County of Santa Cruz. The result of this review documented that the Housing Authority is in compliance with fair housing laws, including our requirement to affirmatively further fair housing. The Housing Authority of the County of Santa Cruz has adopted numerous measures to affirmatively further fair housing, as summarized below.

1. Overcome the effects of impediments to fair housing choice that were identified in the jurisdictions Analysis of Impediments (AI) to Fair Housing Choice

Santa Cruz County is covered in the State of California Consolidated Plan, as well as the City of Santa Cruz Consolidated Plan, and we participate in these processes. The Housing Authority assists the jurisdictions with their initiatives to further fair housing, and the Housing Authority's own annual plan is consistent with the applicable consolidated plans. The Housing Authority of the County of Santa Cruz has taken steps to overcome the impediments to fair housing choice identified in these processes, where applicable and within the realm of the Housing Authority's mission (impediments that do not require changes to local ordinances or laws, etc). Some steps taken to overcome impediments to fair housing choice also serve as remedies to discrimination in housing, or promote fair housing rights and choices and may be repeated below.

Impediment 1: Decentralized local fair housing network creates impediment to finding fair housing information

Impediment 2: Lack of enforcement of federal fair housing laws

- The Housing Authority maintains fair housing brochures and posters in public areas of Housing Authority offices and properties, and makes this information available to members of the community who are seeking information about their fair housing rights. Referrals to HUD, FHEO, Legal Aid and other advocacy organizations are made upon request.

Impediment 3: Lack of affordable accessible housing

- The Housing Authority maintains a referral list of disabled accessible units in the

County, including “affordable” units owned by non-profits or other housing organizations, as well as units listed by landlords interested in renting to Section 8 tenants.

- The Housing Authority has played an active role in the county-wide Continuum of Care working group, which identifies housing needs and sets priorities for funding each year. Identifying and addressing the needs of disabled persons in the community has been a strong focus of this group, and housing needs for disabled persons have been incorporated into the Continuum of Care plan. The identification of these needs, and the strategy for addressing them, was completed with the participation of a wide variety of agencies that serve disabled people, including groups serving people with physical disabilities, mental disabilities, cancer, AIDS, and substance abuse-related disorders.
- The Housing Authority has worked with a variety of community groups to identify disabled housing needs that could be met through HUD and Housing Authority programs. By taking the lead on several applications for funding for such housing programs, the Housing Authority has brought together a diverse group of agencies, including the County Mental Health Department, Santa Cruz Community Counseling Center, Central Coast Center for Independent Living, and Santa Cruz AIDS Project. Also, the Housing Authority provides vouchers for persons with disabilities through its 15% Fair Share set-aside and the Mainstream Housing Opportunities for Persons with Disabilities program, allowing the Housing Authority to partner with local agencies to provide housing for persons with disabilities.

2. Work to mitigate discrimination in housing

- a) **Services for Persons with Limited English Proficiency (LEP):** The Housing Authority has conducted the four factor analysis required by the January 22, 2007 Federal Register notice of guidance regarding “Limited English Proficient Persons.” According to the 2000 Census, 20% of adults in Santa Cruz County speak Spanish. Many of the Housing Authority’s staff members are bilingual in Spanish and English to ensure that this population is well served. Additionally, materials that are handed out to the public, and letters sent to the public, are translated into Spanish for Spanish speakers, and Spanish speaking staff members are available to answer questions. Apart from Spanish speakers, for which the Housing Authority provides full oral and written translation and functions as a completely bilingual agency, there are no other language groups that meet the “safe harbor” limits of 5% or 1,000 speakers (or, in the case of the second factor of the four factor analysis, 5% and 50 speakers.) Furthermore, the Housing Authority has successfully met the needs of the community for over 25 years by providing translation services upon request for those who do not speak English or Spanish.
- b) **Expanded TDD:** As the technology for TDD communication devices improves, the Housing Authority upgrades its equipment to ensure complete accessibility for hearing-impaired individuals. In addition, the Housing Authority has an e-mail account established so that hearing-impaired individuals may contact the Housing Authority by email if preferred.
- c) **Fair housing information:** The Housing Authority maintains fair housing brochures and posters in public areas of Housing Authority offices and properties, and makes

this information available to members of the community who are seeking information about their fair housing rights. Referrals to HUD, FHEO, Legal Aid and other advocacy organizations are made upon request.

- d) **Participation in Continuum of Care:** The Housing Authority has played an active role in the county-wide Continuum of Care working group, which identifies housing needs and sets priorities for funding each year. Identifying and addressing the needs of disabled persons in the community has been a strong focus of this group, and housing needs for disabled persons have been incorporated into the Continuum of Care plan. The identification of these needs, and the strategy for addressing them, was completed with the participation of a wide variety of agencies that serve disabled people, including groups serving people with physical disabilities, mental disabilities, cancer, AIDS, and substance abuse-related disorders.

3. **STEP 3** – Promote fair housing rights and fair housing choice

- a) **List of disabled accessible units:** The Housing Authority maintains a referral list of disabled accessible units in the County, including “affordable” units owned by non-profits or other housing organizations, as well as units listed by landlords interested in renting to Section 8 tenants.
- b) **Disabled access to office:** The Housing Authority continually takes steps to improve accessibility to its offices. Every area of the office and parking lot that is available to the general public, including the lobby, bathrooms, interview rooms and corridors is wheelchair accessible.
- c) **Disabled access improvements to low-income public housing sites:** Capital funds have been used to improve access to low-income public housing sites, including accessibility improvements to twelve units located at various sites throughout the county, improved handicap parking and striping, the addition of ramps and accessible sidewalks, increased lighting, and accessibility improvements to playgrounds and laundry rooms.
- d) **Applications for funding for disabled housing:** The Housing Authority has worked with a variety of community groups to identify disabled housing needs that could be met through HUD and Housing Authority programs. By taking the lead on several applications for funding for such housing programs, the Housing Authority has brought together a diverse group of agencies, including the County Mental Health Department, Santa Cruz Community Counseling Center, Central Coast Center for Independent Living, and Santa Cruz AIDS Project. Also, the Housing Authority provides vouchers for persons with disabilities through its 15% Fair Share set-aside and the Mainstream Housing Opportunities for Persons with Disabilities program, allowing the Housing Authority to partner with local agencies to provide housing for persons with disabilities.
- e) **Security Deposit Program:** The Housing Authority of the County of Santa Cruz administers a county-wide program to provide security deposits and last month’s rent guarantees to eligible Section 8 and non-Section 8 families. The Security Deposit program includes a Renter Certification component in which program participants are counseled on fair housing law, broad choice of where to live, and tips on choosing a unit and being a responsible tenant. This program is funded by the local jurisdictions.
- f) **First Time Homebuyer and MCC Program:** The Housing Authority administers a

First Time Homebuyer program in several jurisdictions to provide deferred second mortgages to low and moderate income first time homebuyers. This program is funded by the local jurisdictions and permits eligible families to purchase a home in a neighborhood that meets their families' needs. The Housing Authority also administers the Mortgage Credit Certificate (MCC) program, which provides a tax credit to eligible first time homebuyers and makes it more possible for them to qualify for financing.

- g) **Broad choice of where to live:** The Housing Authority maintains data on the concentration of low-income census tracts in Santa Cruz County, and regularly encourages program participants to seek housing outside of those areas where low-income families typically cluster.
- h) In addition to the activities described above, the Housing Authority is active in a number of community-wide task forces and planning groups, including:
- **Santa Cruz County Continuum of Care Working Group:** This is a broad-based group of housing and shelter providers who work together to prioritize upcoming projects and submit a coordinated Continuum of Care application to HUD.
 - **Housing Advisory Committee:** Although this group consists of many of the same organizations that are represented in the Continuum of Care group, the focus is more on needs assessments, tracking housing market conditions, conducting ongoing assessments of the current status of affordable housing stock, and making other housing providers aware of projects in pre-development.
 - **United Way Community Assessment Steering Committee:** The Housing Authority participates in the steering committee of the United Way's Community Assessment process, providing input from a housing perspective on community needs, and helping to prioritize and direct local funding.
 - **Local jurisdictions,** who often call on the Housing Authority in an advisory capacity during housing-related planning processes.