

Royston Housing Authority Nondiscrimination Policy

Adopted December 20, 2010

Reviewed January 10, 2019

It is the policy of the Housing Authority of the City of Royston, Georgia, also known as RHA, to comply with Title VIII of the Civil Rights Act of 1968, as amended—commonly known as the Fair Housing Act—by ensuring that apartments are available to all persons without regard to race, color, religion, national origin, disability, familial status or sex. This policy means that, among other things, the RHA and all its agents and employees with the responsibility for renting, managing, or administering any dwelling units must not discriminate in any aspect of the rental of dwellings against qualified applicants or tenants because of race or color. Such agents and employees may not:

- 1) Refuse to rent, or negotiate for the rental of, or otherwise make unavailable or deny, a dwelling to any person because of race or color;
- 2) Discriminate against any person in the terms, conditions or privileges of rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race or color;
- 3) Make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the rental of a dwelling that indicates any preference, limitation, or discrimination based on race or color; or
- 4) Represent to persons because of race or color that any dwelling is not available for inspection or rental when such dwelling is in fact so available.

Any RHA agent or employee who fails to comply with this Nondiscrimination Policy will be subject to appropriate disciplinary action. Any action taken by an agent or employee that results in the unequal service, treatment or behavior to tenants on the basis of race or color may constitute a violation of state and federal fair housing laws. Any tenant who believes that any of the above policies have been violated by any agent or employee of the RHA may contact the U.S. Department of Housing and Urban Development at 1-888-799-2085, or the U.S. Department of Justice at 1-800-896-7743 or 202-514-4713.

HOUSING AUTHORITY OF THE CITY OF ROYSTON

Nondiscriminatory Procedures

The Housing Authority of the City of Royston, formerly known as RHA, uniform nondiscriminatory procedure for: (1) receiving, handling, processing, rejecting, and approving rental inquiries and applications made in-person, by telephone, or by other means; (2) assigning prospective tenants to new units; (3) transferring existing tenants to different units; and, (4) providing services to tenants. Collectively, "Nondiscriminatory Procedures" are as follows:

I. Guest Log

The RHA maintains a guest log that provides the following information for each person who inquires about renting RHA housing:

- a) dates and times on which the person contacted the RHA;
- b) name, address, daytime and evening telephone numbers—if the person declines a request to provide this information, the log shall so stat;
- c) race—either as provided by the person or based on the employee's good faith observation;
- d) name of RHA employee who received the inquiry;
- e) number of persons in the household;
- f) manner of the contact—phone, mail, visit, e-mail, etc.;
- g) result of the contact; and,
- h) whether the person was invited to fill out an application and if not the reasons therefore.

II. Availability List

The RHA updates on a daily basis an availability list that includes the addresses and unit numbers of all dwelling units known to be available or reasonably expected to be available for rental within thirty (30) days, which includes each dwelling:

- a) the address, apartment number, and number of bedrooms;
- b) whether the dwelling is vacant; and if not, the date that the dwelling is scheduled to be vacant;
- c) whether the dwelling is available to be moved into and, if not, the date that is expected to be available for move-ins; and,
- d) the date the list was issued or updated.

III. Preference Indicator Form

The RHA gives a preference indicator form to each applicant during the application process. The preference indicator form explains each of the preferences that are available under the RHA's Admissions and Continued Occupancy Policy, ACOP, and provides a space where the applicant can indicate which preference(s) the applicant believes he or she is entitled to, and the reason. In addition, the RHA requires all applicants to sign the preference indicator form stating that they understand the various preferences available and have had an opportunity to

apply for each one that they believe they are entitled to. The RHA indicates on the preference indicator form which documents, or lack thereof, justify the decision to grant (or deny) each preference and attach such supporting documents. If written records are not available to justify a particular preference, the applicant shall not be eligible for that preference. The Preference Indicator Form is updated for each applicant when that applicant becomes one of the top five members of the waiting list.

IV. **Waiting List**

The RHA maintains separate waiting lists for each size unit that contains each applicant's name and race, current address, daytime and evening telephone numbers, the number of household members, the size of unit for which the applicant is eligible, and applicable preference(s) if any. The RHA also indicates, for each applicant, the time and date he or she was placed on the list and the name of the RHA employee who received the applicant's application. The rank of each applicant on the waiting list is determined in accordance with the RHA's most recent ACOP and in accordance with the requirements set forth in this Section. The RHA maintains complete, accurate, and up-to-date records to support each applicant's rank on the waiting list, the type of dwelling for which applicant is eligible, and the preference RHA gives to each applicant, if any. The RHA records all offers of available units that it makes to persons on the waiting lists and all placements accepted by persons on the waiting lists as set forth in Section VI of these procedures.

V. **Transfer List**

The RHA maintains a list of residents seeking to transfer to other units at RHA. The Transfer list contains the resident's name and race, current address, daytime and evening telephone numbers, the number of household members, the size of the unit for which the resident is eligible, the date and time of the transfer request, the reason for the transfer request, the assigned category, and the name of the RHA employee who received the resident's request for transfer. The rank of each resident on the transfer list shall be determined in accordance with the RHA's most recent ACOP and in accordance with Section IX, para. 41 of the RHA's Consent Decree with the United States. The RHA maintains complete, accurate, and up-to-date records to support each resident's rank on the transfer list, the type of dwelling for which each resident is eligible, and the preference RHA gives to each resident, if any. The RHA records all offers of available units that it makes to persons on the transfer lists and all placements accepted by persons on the transfer list as set forth in Section VI of these procedures.

VI. **Placement Log**

The RHA maintains a log that lists RHA's offers of housing and housing placements. The Placement Log includes, for each vacant unit: the name, current address, and phone number of each applicant considered for placement in that unit; the time(s) and date(s) on which RHA attempted to contact each applicant; the name of the RHA employee who attempted to make such contact; the manner of the attempted contact (phone, mail, email etc.); the result of each attempted contact; whether the applicant was offered the unit and the date and time of such offer; the applicant's response to the offer; and, the number of days the applicant had been on the waiting or transfer list at the time of the placement offer. If the highest-ranking applicant currently on the waiting or transfer list for that size unit is not offered the first unit that has become ready for rental, the RHA shall fully explain why on the Placement Log attaching

any supporting documentation. If RHA offered an applicant more than one unit, the Placement Log provides the reason RHA offered the applicant more than one unit, attaching supporting documentation. If the applicant rejected a unit, the Placement Log provides the reason for the rejection.

VII. Tenant Occupancy List

The RHA maintains a tenant occupancy list that is updated monthly and lists the tenants residing at each of the RHA complexes. The occupancy list for each complex indicates the resident's name, address, phone number, move-in date, size of the unit (e.g. number of bedrooms), number of persons in the household occupying the unit, the race of the leasing resident, and whether the tenant received a preference as elderly/disabled.

VIII. Rental Application

The RHA permits all persons who inquire about renting a dwelling unit the opportunity to complete a written rental application. The RHA writes legibly on each rental application filled out by a prospective tenant the month, day, year, and time that the RHA received the application. The RHA processes the applications in the order in which they are received. Within three (3) days of the decision to reject an applicant, the RHA returns a copy of the application to the applicant and explains in writing the reason for the RHA's decision, including any supporting documentation and the name of the RHA employee who made the decision. The RHA retains all rental applications and copies of correspondence in its files.

IX. Information to Prospective Applicants

The RHA informs all persons who inquire about renting any dwelling that they may fill out an application and, if they qualify, will be put on a waiting list; that they will be offered the first available unit of the size they need when they become the highest-ranking applicant on the waiting list and the consequences of rejecting an offer of housing; and that they will be treated equally irrespective of race or color.

X. Policy for Affirmatively Furthering Fair Housing

The RHA implements a Policy for Affirmatively Furthering Fair Housing that sets out the specific steps the RHA takes to reduce the racial concentration at its seven housing complexes, consistent with the requirement of 24 C.F.R. § 903.2(d). The policy sets forth steps to permit residents to transfer voluntarily to other complexes to reduce racial concentration at its housing complexes.