

FRANKLIN COUNTY CONSOLIDATED HOUSING AUTHORITY REASONABLE ACCOMMODATION POLICY

It is the policy and intention of the Franklin County Consolidated Housing Authority (FCCHA) to not discriminate against individuals with disabilities with regard to the development or operation of FCCHA's housing, housing services, and housing programs. FCCHA is committed to complying with the federal Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title II of the American with Disabilities Act, and other federal, state and local disabilities laws and regulations, as those laws and regulations are amended. FCCHA will provide for accessibility throughout all services and programs.

FCCHA recognizes that some elderly, near-elderly, and qualified individuals with disabilities, need, and are entitled to, reasonable changes or waivers to FCCHA's usual rules and policies in order to fully enjoy and participate in FCCHA's housing, housing services, and programs (Reasonable Accommodations "RAs").

This policy clarifies how people can request accommodations and the guidelines the Housing Authority will follow in determining whether it is reasonable to provide a requested accommodation. FCCHA will ensure that all applicants/tenants are aware of the opportunity to request RAs. As required by federal law, within its inventory, FCCHA will strive to maintain at least 5% accessible housing units for the mobility impaired, 2% for the vision/hearing impaired, and at least 2% accessible parking spaces.

Individuals receiving RAs will be required to comply with all terms of the lease, family obligations, program rules and the law, with a reasonable accommodation if necessary. An applicant family that has a member with a disability must still be able to meet essential obligations of tenancy which include being able to: 1) pay rent, 2) care for their apartment, 3) report required information to the PHA, 4) avoid disturbing their neighbors, etc. There is no requirement that they be able to do these things without assistance.

FCCHA will consider RAs on an individualized case-by-case basis. FCCHA will engage in an interactive process to ensure that reasonable accommodation requests are handled fairly and thoroughly. FCCHA will effectively communicate with individuals with disabilities and will provide reasonable accommodations as necessary to do so, such as providing information to them in alternative formats, providing auxiliary aids, communicating with their designated representatives, and using language interpreters. FCCHA will make reasonable efforts to communicate with disabled persons whose primary language is not English.

If an applicant, resident or a member of the household has a disability, they may

request a reasonable accommodation at the application process or after admission. The PHA will provide a form to use to request a reasonable accommodation and assist with completing the form, if requested. Anyone requesting an application will also receive a copy of the Reasonable Accommodation Policy.

FCCHA will consider an individual to have a "disability" when he/she: 1) has a physical, mental, emotional, developmental, or cognitive impairment that substantially interferes with one or more major life activities; 2) has a record of such an impairment; or 3) has been regarded by FCCHA as having such an impairment. FCCHA will also consider individuals receiving disability-related financial assistance from the Social Security Administration (such as SSI or SSDI) as having a "disability".

Generally, the individual knows best what it is they need; however, the requestor will be required to verify that there is a medical need for the requested accommodation. FCCHA will only provide RAs that are medically necessary for the requestor to fully enjoy and participate in FCCHA's housing, housing services, and programs equally with persons without disabilities. FCCHA will not provide accommodations that are simply beneficial, helpful, or otherwise not medically necessary.

The only exceptions to the verification requirement are for disabilities or accommodations that are obvious or known to FCCHA.

FCCHA considers the following disabilities to be "obvious":

- Individuals who previously were declared by a knowledgeable, licensed professional to be "legally blind" or effectively such.
- Individuals who previously were declared by a knowledgeable, licensed professional to be "legally deaf" or effectively such.
- Persons with extreme limitations on their mobility, such as those who permanently are unable to stand, walk or move without assistance; amputees of a major limb or body part; persons with substantial paralysis, dystrophy of limbs, or other disorders that result in extreme physical or mobility limitations that are immediately apparent to another person.
- Autism, Down's Syndrome, and other mental or developmental disabilities that have physical or mental manifestations immediately apparent to a FCCHA staff person.
- Individuals with Alzheimer's or dementia that have physical or mental manifestations immediately apparent to a FCCHA staff person.

FCCHA will document the reasonable accommodation process and will maintain confidentiality regarding all information received during the reasonable accommodation process.

The Housing Authority retains the right to be shown how the requested accommodation enables the individual to access or use the Housing Authority's programs or services that would not otherwise be accessible. If more than one accommodation is equally effective in providing access to the Housing Authority's programs and services, the Housing Authority retains the right to select the most efficient or economic choice.

The cost necessary to carry out approved requests, including requests for physical modifications, will be borne by the Housing Authority. FCCHA will not provide RAs that place an undue financial and administrative burden on FCCHA, fundamentally alter the nature of FCCHA programs, or otherwise are not feasible or are unreasonable.

All decisions granting or denying requests for reasonable accommodations will be in writing. When FCCHA denies a reasonable accommodation, the requestor has the right to request a review of FCCHA's decision.