

2022

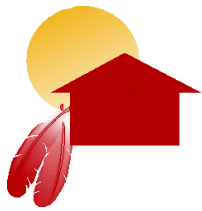
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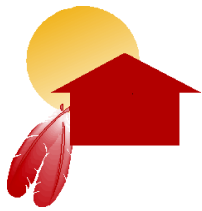
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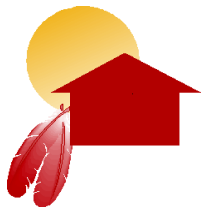
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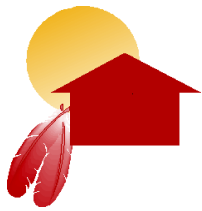
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
I. Purpose				
<p>HUD’s regulations at 24 CFR Part 8 implement the requirements of Section 504 of the Rehabilitation Act of 1973. Section 504 requirements apply to the IHBG, ICDBG, RHED/RIF, and ROSS programs.</p> <p>The purpose of Section 504 is ensure that no otherwise qualified individual with a handicap(s) shall, solely by reason of his or her handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any housing project funded with program funds.</p> <p>Recipients have an obligation to comply with pertinent laws and regulations that provide for non-discrimination and accessibility in federally-funded housing and non-housing programs for people with disabilities. A recipient shall make reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with handicaps, including visual, unless the recipient can demonstrate that the accommodation would impose an undue hardship on the operation of its program.</p>	<p>Section 504 of the Rehabilitation Act of 1973 24 CFR Part 8 24 CFR 1000.12 (b)</p>	<p>Notice PIH 2008-6 (originally Notice PIH 2006-38)</p>		<p>Read & Noted</p>



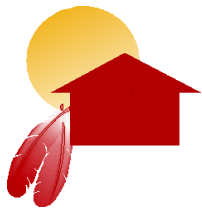
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II. Pre-Visit Preparation				-
A. If available, review the following documents as they pertain to Section 504 compliance: <ol style="list-style-type: none"> 1. Most recent IHP, approved IHP amendments, IHP amendments in process 2. Policies and procedures (see section III for review instructions) 3. Previous monitoring findings 4. Previous self-monitoring report(s) 5. Previous financial and OIG audits findings and/or work papers 6. Corrective actions status for findings 7. Previous and current enforcement actions 8. Valid complaints 9. Relevant correspondence 	24 CFR 8.24 24 CFR 1000.12 (b)	Notice PIH 2008-6 (for specific information, see Notice PIH 2006-38)		Read & Noted
III. On-Site Review				-
A. Review the sampling methods in the General Instructions.				-
B. Rental Unit Assessment				-
1. Review can be done prior to on-site visit.	24 CFR 8.22(a) & (b)			N/A in 2022
2. Determine the number of rental units owned and operated by the recipient and funded with federal funds.	24 CFR 8.23(a) 24 CFR 8.23(b)	Notice PIH 2006-38		N/A in 2022



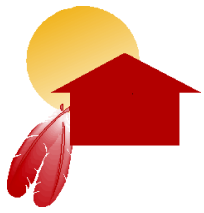
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
a. Calculate the number of rental units required to be accessible (min. of 1).				N/A in 2022
(1) Total number of units x 5% = Total accessible units required;				N/A in 2022
(2) Number of units x 2% = Total hearing or vision impairment units required;				N/A in 2022
(3) Write summary of results.				N/A in 2022
(4) If recipient does not meet the percentage requirement for number of Section 504 accessibility units, request guidance from Supervisor.				N/A in 2022
b. Determine if a rental project has undergone rehabilitation.				N/A in 2022
(1) Substantial rehab. – if a project has 15 or more units and the cost of alterations is 75% or more of the replacement cost, then provisions for new construction apply.	24 CFR 8.22(a) and (b)			N/A in 2022
(2) Other rehabilitation – when other alterations are done, at least 5% of the units must be accessible. (Number of units in project x 5% = number of accessible units).	24 CFR 8.23(b)			N/A in 2022



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
C. Homeownership Unit Assessment				N/A in 2022
1. Review on site if information is not submitted prior to on-site visit.	Section 504 Requirements (7.a)			N/A in 2022
2. Determine the number of homeownership units funded with federal funds and not conveyed to the family.	24 CFR 8.22(b) 24 CFR 8.24 24 CFR 8.29			N/A in 2022
a. Determine how many homeownership units are accessible by interviewing staff and reviewing files.				N/A in 2022
b. Review the files on site for requests for accessibility.				N/A in 2022
D. Review of Other Requirements				N/A in 2022
1. Review on site if information is not submitted prior to on-site visit.	24 CFR 8.24 24 CFR 1000.12(b)	Notice PIH 2008-6 (originally Notice PIH 2006-38)		N/A in 2022
2. Recipient's self-evaluation needs assessment and transition plan:				N/A in 2022
a. Interview staff to ascertain how many accessible rental and homeownership units have been built or renovated.				N/A in 2022



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
(1) Determine how many units were funded under the 1937 Housing Act.				N/A in 2022
(2) Determine how many units and buildings were funded under NAHASDA.				N/A in 2022
(3) Determine how many units and buildings were funded under other programs.				N/A in 2022
b. Review construction files to determine how many were built as accessible units.				N/A in 2022
IV. Summary				-
<ul style="list-style-type: none"> A. Summarize the results of the review in a work paper. B. Discuss significant issues with Supervisor. C. Develop findings, including questioned costs and corrective actions, as appropriate. D. Develop concerns because they could lead to a violation E. Develop report language, including any findings and concerns. F. If there are any major issues identified in this review and the recipient has approval to invest, determine if a withdrawal of investment authority should be recommended. 		See attached form: Disability Rights in Housing		Section 504 is addressed with the “Disability Rights in Housing” form that is given to all clients. ADA accessible meeting space is available at each of our locations.



Reviewer Name:	Lisabeth Nielssen, interviewed Sharon Paskewitz & Justin Krupa
Review Date(s):	11/08/22

Lisabeth Nielssen: *L. A. Nielssen*

Sharon Paskewitz: *Sharon Paskewitz*

Justin Krupa: *J. Krupa*

Reviewed and Approved by Carey Thurston, CFO:



Samish Indian Nation

Disability Rights in Housing

Disability Rights in Private and Public Housing:

Regardless of whether you live in private or public housing, Federal laws provide the following rights to persons with disabilities:

Prohibits discrimination against persons with disabilities. It is unlawful for a housing provider to refuse to rent or sell to a person simply because of a disability. A housing provider may not impose different application or qualification criteria, rental fees or sales prices, and rental or sales terms or conditions than those required of or provided to persons who are not disabled.

Requires housing providers to make reasonable accommodations for persons with disabilities. A reasonable accommodation is a change in rules, policies, practices, or services so that a person with a disability will have an equal opportunity to use and enjoy a dwelling unit or common space. Reasonable accommodations may be necessary at all stages of the housing process, including application, tenancy, or to prevent eviction.

Requires housing providers to allow persons with disabilities to make reasonable modifications. A reasonable modification is a structural modification that is made to allow persons with disabilities the full enjoyment of the housing and related facilities.

Requires that new covered multifamily housing be designed and constructed to be accessible. In covered multifamily housing consisting of 4 or more units with an elevator built for first occupancy after March 13, 1991, all units must comply with the following seven design and construction requirements of the Fair Housing Act:

- Accessible Entrance on an Accessible Route
- Accessible Public and Common-Use Areas
- Usable Doors
- Accessible Route into and through the Dwelling Unit
- Accessible Light Switches, Electrical Outlets, Thermostats, and Environmental Controls
- Reinforced Walls in Bathrooms
- Usable Kitchens and Bathrooms