AFFIRMATIVE FAIR HOUSING MARKETING PLAN

MSHDA — MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY

1. INTRODUCTION

All MSHDA financed developments must maintain a current approved Affirmative Fair Housing Marketing (AFHM) plan on-site. The AFHM ensures that owners of MSHDA-financed housing developments take necessary steps to eliminate discriminatory practices involving MSHDA-financed housing. If the development's AFHM plan is older than four years, or no AFHM can be found, revise and resubmit a new plan for MSHDA approval. The revised plan should incorporate and reflect the current marketing area's demographics as of the application date.

2. APPLICANT IDENTIFICATION

MSHDA No.: 4135 | HUD Contract No.:

	A. Development	B. Managing Agent	C. Owner
Name:	Grand Vista Place	Michigan Asset Group	425 S. Grand Limited Dividend Housing Association LP
Address:	S. Grand Avenue & Chweery Street Parcel IDs 33-01-01-16-456-012 & 33-01-01-16-456-101	1161 E Clark Road Ste 236	419 Cherry St.
City, St, Zip:	Lansing MI 48933	DeWitt MI 48820	Lansing MI 48933
E-mail:	DFleming@lanshc.org	evert@miasset.com	DFleming@lanshc.org
Telephone:	517-487-6550	517-668-6447	517-487-6550
Contact Name:	Doug Fleming	Evert Kramer	Doug Fleming

D. Housing Market Area Boundaries & Census Tract: Census Tract 67 (Ingham County, MI); City of Lansing, MI; Ingham County, MI

~~E.~~ Type & Number of Housing Units: Family Units: 55 | Elderly Units: 0 | Total Units: 55

F. Rental Range: $ 942 **To** $ 1,509 *** Attach most current approved rent schedule.**

3. TYPE OF AFFIRMATIVE MARKETING PLAN

A. Plan Status (Check one):

- ✔ New --->
- ☐ Updated

If New Plan, Approximate Starting Dates (mm/dd/yyyy) for: Advertising: TBD; Occupancy: TBD

B. Housing Market Composition (Enter the % of each race in the area):

72	White (non-Hispanic)	1	American Indian/Alaskan Native
12	Black (non-Hispanic)	1	Native Hawaiian/ Pacific Islander
8	Hispanic or Latino	6	Asian

Total: 100.0

4. DIRECTION OF MARKETING ACTIVITY

Indicate below which group(s) in the housing market area is/are least likely to apply for the housing because of its location and other factors without special outreach efforts taking place (Check all that apply):

- ☐ White (non-Hispanic)
- ✔ Asian/Native Hawaiian/ Pacific Islander
- ✔ Families with Children
- ✔ Black (non-Hispanic)
- ✔ American Indian/Alaskan Native
- ✔ Hispanic
- ✔ Persons with Disabilities (Developments must affirmatively market to people with disabilities)
- ☐ Other (Please Specify):

5. MARKETING PROGRAM

A. Commercial Media - Please determine the media to be used to advertise the availability of this housing (Check all that apply):

- ✔ Website/Internet
- ☐ TV
- ☐ Radio
- ☐ Billboard(s)
- ✔ Newspaper(s)/Publications
- ☐ Other (specify):

Name of Newspaper, Radio or TV Stations	Racial/Ethnic Id. of Audience	Size/Durations of Advertising
Lansing State Journal	All Groups	1.5" x 2" for duration of lease up*
Rent.com	All Groups	8' x 11" webpage for duration of lease up*
Apartmentguide.com	All Gruops	8' x 11' webpage for duration of lease up*
*and as needed thereafter		

B. Brochures, Signs and HUD's Fair Housing Poster

1 Will brochures, leaflets, or handouts be used to advertise?

✔	Yes - Explain distribution methods and attach a copy:	dropped off by hand or mailed to community agencies for distribution by agencies to interested members of the Target Population
	No	

2	For project site sign: indicate sign size:	TBD	X		***Attach a photograph of project sign**
	Logo type size:	TBD	X		

3 Fair Housing Poster must be conspicuously displayed whenever rentals and showings take place. Fair Housing Posters will/are displayed in the:

✔	Rental/Leasing Office(s)	✔	On-Site Management Office(s)		Model Units
	Other (Specify):				

C. Community Contacts

To further inform the group(s) least likely to apply about the availability of the housing, the applicant agrees to establish and maintain contact with the groups & organizations listed below that are located in the housing market area. If more space is needed, attach an additional sheet. Notify MSHDA of any changes in this list. Attach a copy of correspondence to be mailed to these groups/organizations. (Provide all requested information).

	1. Name of Group/Organization	2. Group Identification	3. Approximate Date of Contact or Proposed Contact (mm/dd/yyyy)	4. Person Contacted or to be Contacted
1	Capital Area Michigan Works	All Groups	90 days prior to anticipated CofO	Tekea Norwood
2	Tri-County Council on Aging	All Groups	90 days prior to anticipated CofO	Jill Moulton
3	Bethany Christian Services	All Groups	90 days prior to anticipated CofO	Eric Christian
4	Michigan Department of Health & Human Services	All Groups	90 days prior to anticipated CofO	SuAlyn Holbrook
5	St. Vincent Catholic Charities	All Groups	90 days prior to anticipated CofO	Emanuel Dukes
6	City Rescue Mission of Lansing	All Groups	90 days prior to anticipated CofO	Randy Barton

	5. Address & Telephone	6. Method of Contacts	7. Indicate the specific function Group/Organization will undertake in implementing the Marketing Program
1	2110 S Cedar St. Lansing MI 48910 517.492.5500	Letter/Telephone	referrals
2	5303 S Cedar St. Lansing MI 48911 517.887.1369	Letter/Telephone	referrals
3	612 W Lake Lansing Rd Ste 600 East Lansing MI 48823 517.336.0191	Letter/Telephone	referrals
4	5303 S Cedar St. Suite 1 Lansing MI 48911 517.887.9400	Letter/Telephone	referrals
5	2800 West Willow St. Lansing MI 48917 517.323.4734	Letter/Telephone	referrals
6	2216 S. Cedar St. Lansing MI 48910 517.372.4700	Letter/Telephone	referrals

6. FUTURE MARKETING ACTIVITIES

Please verify those listed below that best describes future marketing activities to fill vacancies as they occur after the development is initially occupied.

✔	Newspapers/Publications		Radio		TV	✔	Site Signs
✔	Brochures/Leaflets/Handouts	✔	Community Contacts			✔	Websites/Internet

Other:

7. FAIR HOUSING EXPERIENCE AND STAFF TRAININGS (SEE INSTRUCTIONS)

What experience does staff have ***marketing to the racial group least likely to apply*** :	Fair Housing training of all staff, at least annually, is provided either internally or through various organizations or agencies.

Frequency of staff fair housing trainings (Check one):		Bi-annually		Other:	
	✔	Annually			

List trainings completed on Federal, State, and local fair housing laws and regulations. **Attach a copy of training materials**.

1	Fair Housing Overview - Fair Housing Center of Southwest Michigan
2	Fair Housing Accommodations, Modifications & Sensitivity Solutions - Occupancy Solutions LLC
3	National Council for Housing Management
4	Full House Marketing
5	Preventing Harassment for Private Housing Owners & Managers Participating in Voucher Program - HUD Exchange
6	

8. AFHM PLAN GOALS (ATTACH ADDITIONAL SHEETS TO THIS FORM)

- ✔ **A.** Indicate the number of units you expect to rent to the population you identify as least likely to apply for housing at your development.
- ✔ **B.** Provide the same information for persons with disabilities.
- ✔ **C.** Provide a breakdown of the overall marketing budget and the part that will be used to implement the Plan.
- ✔ **D.** Indicate how much money is budgeted for commercial media usage.
- ✔ **E.** Indicate who is responsible for completing the outreach program.
- ✔ **F.** Outline in writing the prior experience of the Management Agent in setting and achieving AFHM goals (MSHDA Mgmt. 440C form).

9. AFHM REQUIREMENTS

By signing this form, the authorized individual agrees to ensure continued compliance with MSHDA's Affirmative Fair Housing Marketing Requirements. Certification of compliance includes the following actions:

- ✔ **A.** Conduct a continuous outreach program to maintain a well-balanced waiting list to ensure the achievement of the affirmative marketing goals at all times.
- ✔ **B.** Include a housing discrimination disclaimer on all preliminary and full application forms. The disclaimer will pledge not to discriminate against applicants based on their race, sex, age, religion, national origin, familial status, or disability.
- ✔ **C.** Include the Accessibility and Equal Housing Opportunity logos in all advertisements, if the development has barrier free or accessible units.
- ✔ **D.** Maintain a log community contacts, daily traffic records, and any other record keeping materials for inspection and validation of AFHM plan effectiveness. Also, maintain a copy of the AFHM plan on-site.
- ✔ **E.** Post all required fair housing sign in designated locations.
- ✔ **F.** Agree to and start Affirmative Fair Housing Marketing efforts to the "target population(s)" at least 120 days prior to anticipated initial occupancy (if applicable).
- ✔ **G.** Identify any prospective residential preferences and make these preferences known.
- ✔ **H.** Commit to review the development's AFHM plan every 5 years to update and maintain marketing objectives based on the area's latest demographics.

Signature of person submitting Plan: Evert Kramer

Date of Submission: 10/17/2024

Name (type or print): Evert Kramer

Title & Name of Company: President, Michigan Asset Group LLC

10. SUBMISSION

COMPLETE FORM AND SUBMIT ELECTRONICALLY to **MSHDA-AFHMP@Michigan.gov**.

11. FOR MSHDA/HUD USE ONLY

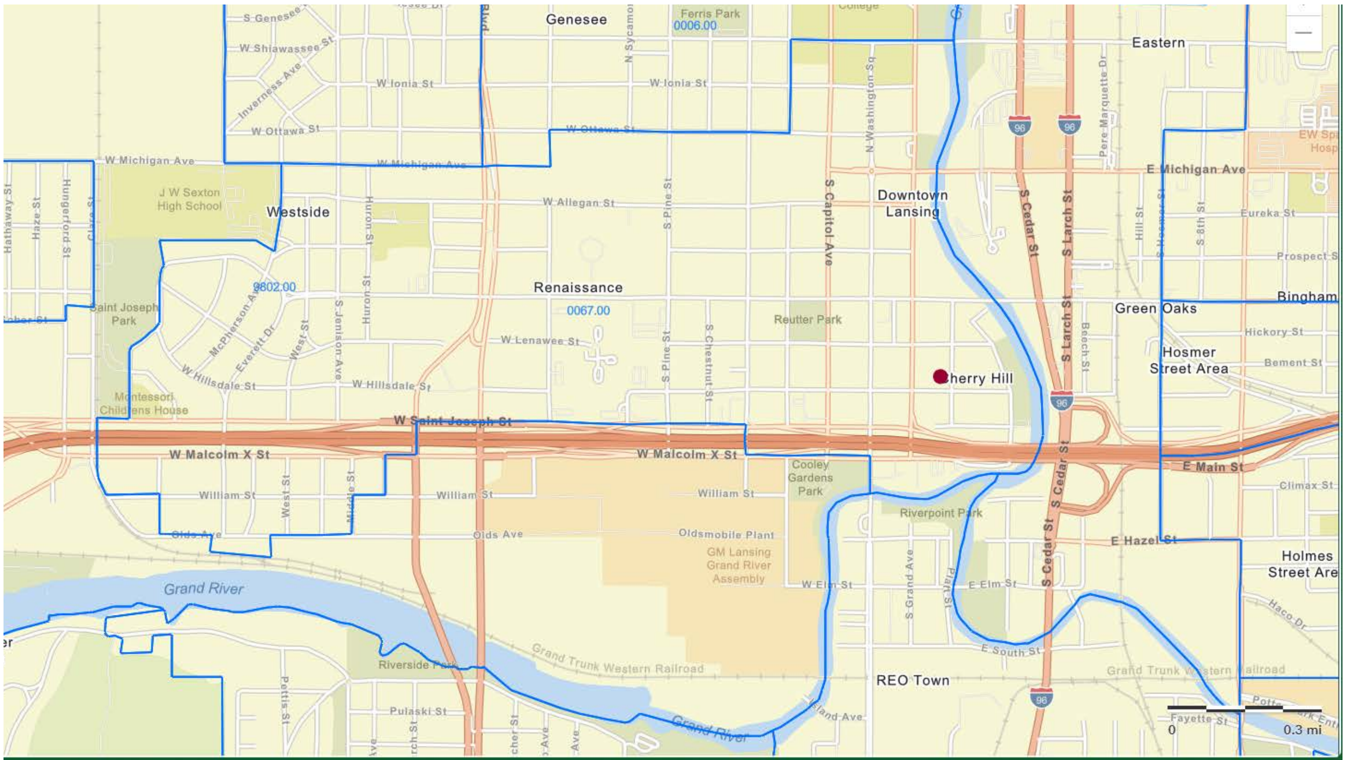
Approved By:

Date:

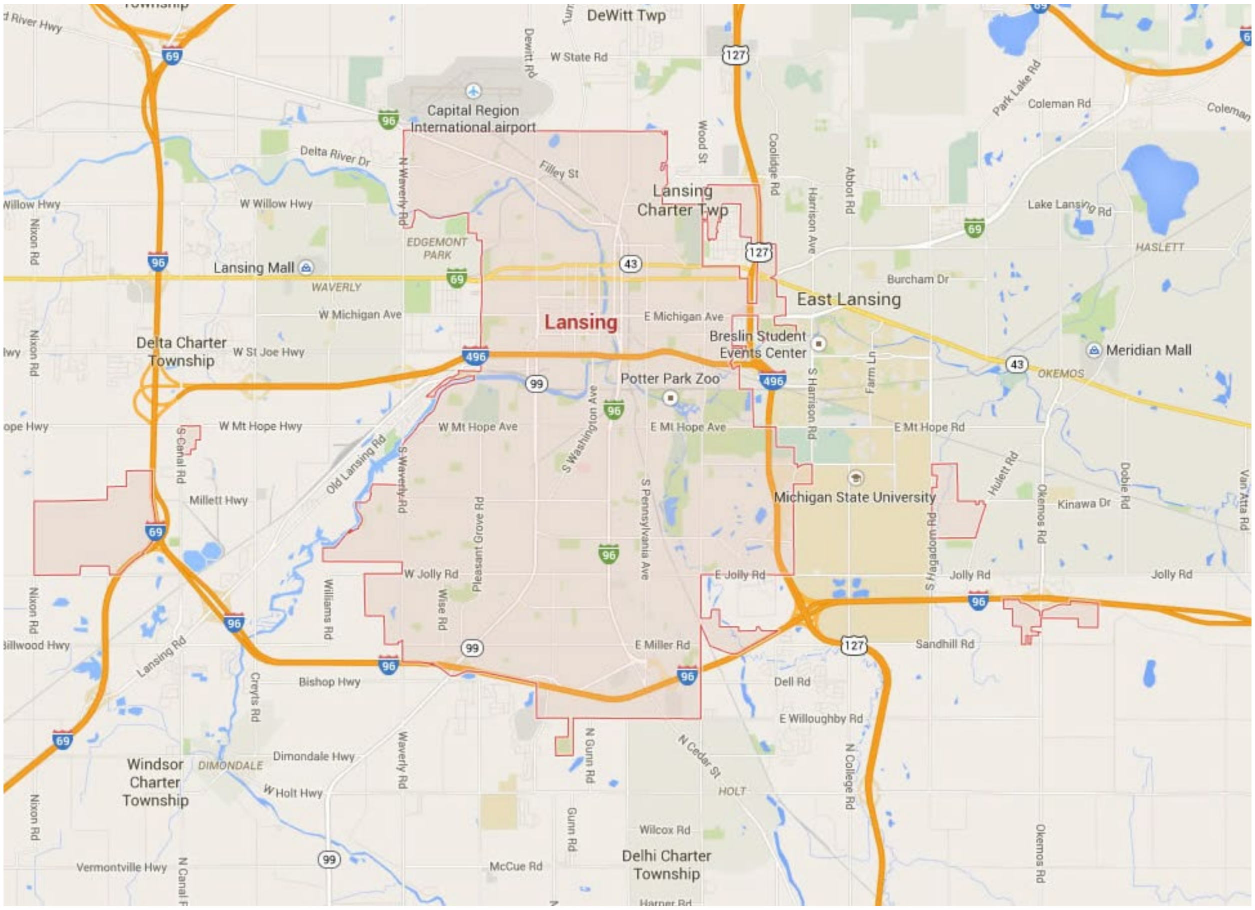
Name (type or print):

Title:

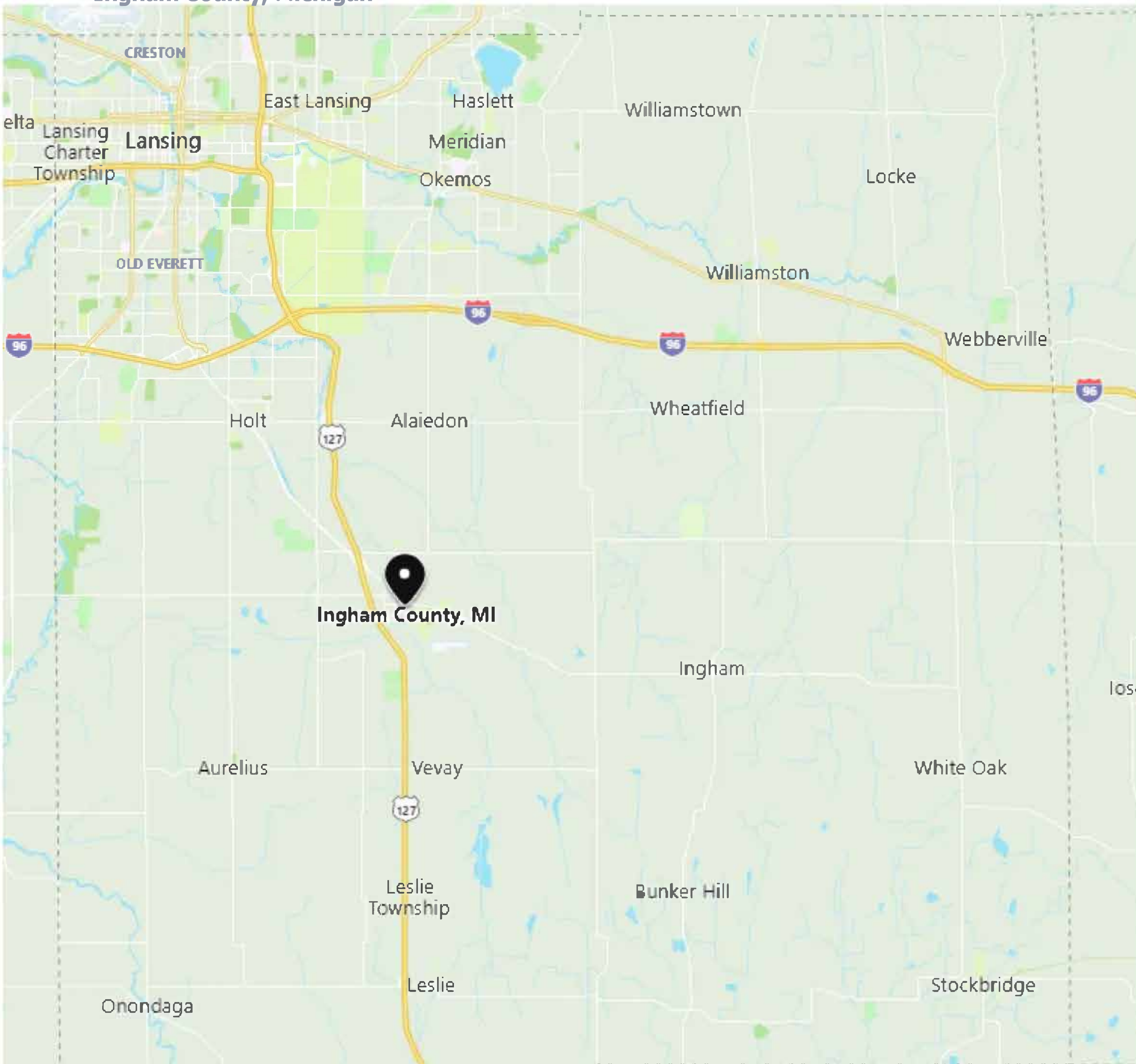
Census Tract 67



City of Lansing



Housing Market Area
Ingham County, Michigan



ACS Demographic and Housing Estimates

Note: The table shown may have been modified by user selections. Some information may be missing.

DATA NOTES	
TABLE ID:	DP05
SURVEY/PROGRAM:	American Community Survey
VINTAGE:	2022
DATASET:	ACSDP5Y2022
PRODUCT:	ACS 5-Year Estimates Data Profiles
UNIVERSE:	None
MLA:	U.S. Census Bureau. "ACS Demographic and Housing Estimates." American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP05, 2022, https://data.census.gov/table/ACSDP5Y2022.DP05?q=dp02 dp05&g=050XX00US26065_1400000US26065006700_160XX00US2646000&moe=false. Accessed on August 23, 2024.
FTP URL:	None
API URL:	https://api.census.gov/data/2022/acs/acs5/profile
USER SELECTIONS	
TABLES	DP02; DP05
GEOS	Census Tract 67; Ingham County; Michigan; Lansing city, Michigan; Ingham County, Michigan
EXCLUDED COLUMNS	Ingham County, Michigan!!Margin of Error
	Ingham County, Michigan!!Percent Margin of Error
	Census Tract 67; Ingham County; Michigan!!Margin of Error
	Census Tract 67; Ingham County; Michigan!!Percent Margin of Error
	Lansing city, Michigan!!Margin of Error
	Lansing city, Michigan!!Percent Margin of Error
APPLIED FILTERS	None

APPLIED SORTS	None
PIVOT & GROUPING	
PIVOT COLUMNS	None
PIVOT MODE	Off
ROW GROUPS	None
VALUE COLUMNS	None
WEB ADDRESS	https://data.census.gov/table/ACSDP5Y2022.DP05?q=dp02%20dp05&g=050XX00US26065_1400000US26065006700_160XX00US2646000&moe=false
TABLE NOTES	
	Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, the decennial census is the official source of population totals for April 1st of each decennial year. In between censuses, the Census Bureau's Population Estimates Program produces and disseminates the official estimates of the population for the nation, states, counties, cities, and towns and estimates of housing units for states and counties.
	Information about the American Community Survey (ACS) can be found on the ACS website. Supporting documentation including code lists, subject definitions, data accuracy, and statistical testing, and a full list of ACS tables and table shells (without estimates) can be found on the Technical Documentation section of the ACS website. Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.
	Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

	Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see ACS Technical Documentation). The effect of nonsampling error is not represented in these tables.
	For more information on understanding Hispanic origin and race data, please see the America Counts: Stories Behind the Numbers article entitled, 2020 Census Illuminates Racial and Ethnic Composition of the Country, issued August 2021.
	The Hispanic origin and race codes were updated in 2020. For more information on the Hispanic origin and race code changes, please visit the American Community Survey Technical Documentation website.
	The 2018-2022 American Community Survey (ACS) data generally reflect the March 2020 Office of Management and Budget (OMB) delineations of metropolitan and micropolitan statistical areas. In certain instances, the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB delineation lists due to differences in the effective dates of the geographic entities.
	Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on 2020 Census data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.
	Explanation of Symbols:- The estimate could not be computed because there were an insufficient number of sample observations. For a ratio of medians estimate, one or both of the median estimates falls in the lowest interval or highest interval of an open-ended distribution. For a 5-year median estimate, the margin of error associated with a median was larger than the median itself.N The estimate or margin of error cannot be displayed because there were an insufficient number of sample cases in the selected geographic area. (X) The estimate or margin of error is not applicable or not available.median- The median falls in the lowest interval of an open-ended distribution (for example "2,500-")median+ The median falls in the highest interval of an open-ended distribution (for example "250,000+").** The margin of error could not be computed because there were an insufficient number of sample observations.*** The margin of error could not be computed because the median falls in the lowest interval or highest interval of an open-ended distribution.***** A margin of error is not appropriate because the corresponding estimate is controlled to an independent population or housing estimate. Effectively, the corresponding estimate has no sampling error and the margin of error may be treated as zero.

COLUMN NOTES	None

	Ingham County, Michigan (Expanded Housing Market Area)		Census Tract 67; Ingham County; Michigan (Census Tract)	
Label	**Estimate**	**Percent**	**Estimate**	**Percent**
SEX AND AGE				
Total population	282,540	282,540	4,737	4,737
Male	138,535	49.0%	2,466	52.1%
Female	144,005	51.0%	2,271	47.9%
Sex ratio (males per 100 females)	96.2	(X)	108.6	(X)
Under 5 years	15,123	5.4%	523	11.0%
5 to 9 years	15,951	5.6%	292	6.2%
10 to 14 years	14,914	5.3%	95	2.0%
15 to 19 years	24,100	8.5%	197	4.2%
20 to 24 years	38,333	13.6%	702	14.8%
25 to 34 years	40,195	14.2%	1,275	26.9%
35 to 44 years	32,617	11.5%	451	9.5%
45 to 54 years	29,650	10.5%	219	4.6%
55 to 59 years	14,755	5.2%	207	4.4%
60 to 64 years	16,683	5.9%	286	6.0%
65 to 74 years	24,873	8.8%	363	7.7%
75 to 84 years	10,315	3.7%	127	2.7%
85 years and over	5,031	1.8%	0	0.0%
Median age (years)	33.0	(X)	29.4	(X)
Under 18 years	55,421	19.6%	1,020	21.5%
16 years and over	233,674	82.7%	3,717	78.5%
18 years and over	227,119	80.4%	3,717	78.5%
21 years and over	202,145	71.5%	3,620	76.4%
62 years and over	50,168	17.8%	664	14.0%
65 years and over	40,219	14.2%	490	10.3%
18 years and over	227,119	227,119	3,717	3,717
Male	110,181	48.5%	1,708	46.0%
Female	116,938	51.5%	2,009	54.0%

	Lansing, Michigan (Housing Market Area)	
Label	**Estimate**	**Percent**
SEX AND AGE		
Total population	112,986	112,986
Male	55,579	49.2%
Female	57,407	50.8%
Sex ratio (males per 100 females)	96.8	(X)
Under 5 years	8,011	7.1%
5 to 9 years	7,407	6.6%
10 to 14 years	6,472	5.7%
15 to 19 years	5,963	5.3%
20 to 24 years	11,142	9.9%
25 to 34 years	21,479	19.0%
35 to 44 years	13,644	12.1%
45 to 54 years	12,030	10.6%
55 to 59 years	6,138	5.4%
60 to 64 years	6,477	5.7%
65 to 74 years	9,498	8.4%
75 to 84 years	3,193	2.8%
85 years and over	1,532	1.4%
Median age (years)	32.9	(X)
Under 18 years	25,724	22.8%
16 years and over	90,023	79.7%
18 years and over	87,262	77.2%
21 years and over	83,209	73.6%
62 years and over	18,198	16.1%
65 years and over	14,223	12.6%
18 years and over	87,262	87,262
Male	42,256	48.4%
Female	45,006	51.6%

	Ingham County, Michigan (Expanded Housing Market Area)		Census Tract 67; Ingham County; Michigan (Census Tract)	
Label	Estimate	Percent	Estimate	Percent
Sex ratio (males per 100 females)	94.2	(X)	85.0	(X)
65 years and over	40,219	40,219	490	490
Male	17,652	43.9%	282	57.6%
Female	22,567	56.1%	208	42.4%
Sex ratio (males per 100 females)	78.2	(X)	135.6	(X)
RACE				
Total population	282,540	282,540	4,737	4,737
One race	260,155	92.1%	4,226	89.2%
Two or More Races	22,385	7.9%	511	10.8%
One race	260,155	92.1%	4,226	89.2%
White	202,102	71.5%	2,441	51.5%
Black or African American	33,555	11.9%	1,473	31.1%
American Indian and Alaska Native	1,082	0.4%	25	0.5%
Cherokee tribal grouping	7	0.0%	0	0.0%
Chippewa tribal grouping	323	0.1%	0	0.0%
Navajo tribal grouping	21	0.0%	0	0.0%
Sioux tribal grouping	0	0.0%	0	0.0%
Asian	17,965	6.4%	172	3.6%
Asian Indian	4,364	1.5%	160	3.4%
Chinese	5,266	1.9%	0	0.0%
Filipino	890	0.3%	0	0.0%
Japanese	283	0.1%	0	0.0%
Korean	1,689	0.6%	12	0.3%
Vietnamese	1,664	0.6%	0	0.0%
Other Asian	3,809	1.3%	0	0.0%
Native Hawaiian and Other Pacific Islander	15	0.0%	0	0.0%

	Lansing, Michigan (Housing Market Area)	
Label	**Estimate**	**Percent**
Sex ratio (males per 100 females)	93.9	(X)
65 years and over	14,223	14,223
Male	6,143	43.2%
Female	8,080	56.8%
Sex ratio (males per 100 females)	76.0	(X)
RACE		
Total population	112,986	112,986
One race	101,956	90.2%
Two or More Races	11,030	9.8%
One race	101,956	90.2%
White	65,728	58.2%
Black or African American	26,796	23.7%
American Indian and Alaska Native	460	0.4%
Cherokee tribal grouping	7	0.0%
Chippewa tribal grouping	131	0.1%
Navajo tribal grouping	0	0.0%
Sioux tribal grouping	0	0.0%
Asian	5,616	5.0%
Asian Indian	896	0.8%
Chinese	706	0.6%
Filipino	411	0.4%
Japanese	90	0.1%
Korean	268	0.2%
Vietnamese	755	0.7%
Other Asian	2,490	2.2%
Native Hawaiian and Other Pacific Islander	0	0.0%

	Ingham County, Michigan (Expanded Housing Market Area)		Census Tract 67; Ingham County; Michigan (Census Tract)	
Label	**Estimate**	**Percent**	**Estimate**	**Percent**
Chamorro	0	0.0%	0	0.0%
Native Hawaiian	15	0.0%	0	0.0%
Samoan	0	0.0%	0	0.0%
Other Native Hawaiian and Other Pacific Islander	0	0.0%	0	0.0%
Some Other Race	5,436	1.9%	115	2.4%
Two or More Races	22,385	7.9%	511	10.8%
White and Black or African American	7,665	2.7%	223	4.7%
White and American Indian and Alaska Native	2,175	0.8%	0	0.0%
White and Asian	3,138	1.1%	0	0.0%
White and Some Other Race	7,048	2.5%	99	2.1%
Black or African American and American Indian and Alaska Native	243	0.1%	0	0.0%
Black or African American and Some Other Race	310	0.1%	0	0.0%
Race alone or in combination with one or more other races				
Total population	282,540	282,540	4,737	4,737
White	223,574	79.1%	2,937	62.0%
Black or African American	42,913	15.2%	1,856	39.2%
American Indian and Alaska Native	4,296	1.5%	199	4.2%
Asian	21,638	7.7%	187	3.9%
Native Hawaiian and Other Pacific Islander	460	0.2%	0	0.0%
Some Other Race	13,404	4.7%	243	5.1%

	Lansing, Michigan (Housing Market Area)	
Label	**Estimate**	**Percent**
Chamorro	0	0.0%
Native Hawaiian	0	0.0%
Samoan	0	0.0%
Other Native Hawaiian and Other Pacific Islander	0	0.0%
Some Other Race	3,356	3.0%
Two or More Races	11,030	9.8%
White and Black or African American	4,045	3.6%
White and American Indian and Alaska Native	924	0.8%
White and Asian	946	0.8%
White and Some Other Race	3,589	3.2%
Black or African American and American Indian and Alaska Native	231	0.2%
Black or African American and Some Other Race	254	0.2%
Race alone or in combination with one or more other races		
Total population	112,986	112,986
White	76,088	67.3%
Black or African American	32,038	28.4%
American Indian and Alaska Native	2,196	1.9%
Asian	6,730	6.0%
Native Hawaiian and Other Pacific Islander	269	0.2%
Some Other Race	7,481	6.6%

	Ingham County, Michigan (Expanded Housing Market Area)		Census Tract 67; Ingham County; Michigan (Census Tract)	
Label	**Estimate**	**Percent**	**Estimate**	**Percent**
HISPANIC OR LATINO AND RACE				
Total population	282,540	282,540	4,737	4,737
Hispanic or Latino (of any race)	23,272	8.2%	247	5.2%
Mexican	17,008	6.0%	175	3.7%
Puerto Rican	1,457	0.5%	0	0.0%
Cuban	1,791	0.6%	0	0.0%
Other Hispanic or Latino	3,016	1.1%	72	1.5%
Not Hispanic or Latino	259,268	91.8%	4,490	94.8%
White alone	192,417	68.1%	2,403	50.7%
Black or African American alone	32,076	11.4%	1,464	30.9%
American Indian and Alaska Native alone	806	0.3%	25	0.5%
Asian alone	17,835	6.3%	172	3.6%
Native Hawaiian and Other Pacific Islander alone	15	0.0%	0	0.0%
Some Other Race alone	1,527	0.5%	43	0.9%
Two or More Races	14,592	5.2%	383	8.1%
Two races including Some Other Race	1,653	0.6%	0	0.0%
Two races excluding Some Other Race, and three or more races	12,939	4.6%	383	8.1%
Total housing units	125,391	(X)	2,520	(X)
CITIZEN, VOTING AGE POPULATION				
Citizen, 18 and over population	213,153	213,153	3,578	3,578
Male	102,783	48.2%	1,641	45.9%

Table: ACSDP5Y2022.DP05

	Lansing, Michigan (Housing Market Area)	
Label	**Estimate**	**Percent**
HISPANIC OR LATINO AND RACE		
Total population	112,986	112,986
Hispanic or Latino (of any race)	14,105	12.5%
Mexican	10,766	9.5%
Puerto Rican	783	0.7%
Cuban	1,009	0.9%
Other Hispanic or Latino	1,547	1.4%
Not Hispanic or Latino	98,881	87.5%
White alone	59,487	52.6%
Black or African American alone	26,000	23.0%
American Indian and Alaska Native alone	321	0.3%
Asian alone	5,574	4.9%
Native Hawaiian and Other Pacific Islander alone	0	0.0%
Some Other Race alone	684	0.6%
Two or More Races	6,815	6.0%
Two races including Some Other Race	598	0.5%
Two races excluding Some Other Race, and three or more races	6,217	5.5%
Total housing units	55,082	(X)
CITIZEN, VOTING AGE POPULATION		
Citizen, 18 and over population	81,654	81,654
Male	39,360	48.2%

	Ingham County, Michigan (Expanded Housing Market Area)		Census Tract 67; Ingham County; Michigan (Census Tract)	
Label	**Estimate**	**Percent**	**Estimate**	**Percent**
Female	110,370	51.8%	1,937	54.1%

Table: ACSDP5Y2022.DP05

	Lansing, Michigan (Housing Market Area)	
Label	**Estimate**	**Percent**
Female	42,294	51.8%

Selected Social Characteristics in the United States

Note: The table shown may have been modified by user selections. Some information may be missing.

DATA NOTES	
TABLE ID:	DP02
SURVEY/PROGRAM:	American Community Survey
VINTAGE:	2022
DATASET:	ACSDP5Y2022
PRODUCT:	ACS 5-Year Estimates Data Profiles
UNIVERSE:	None
MLA:	U.S. Census Bureau. "Selected Social Characteristics in the United States." American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP02, 2022, https://data.census.gov/table/ACSDP5Y2022.DP02?q=dp02 dp05&g=050XX00US26065_1400000US26065006700_160XX00US2646000&moe=false. Accessed on August 26, 2024.
FTP URL:	None
API URL:	https://api.census.gov/data/2022/acs/acs5/profile
USER SELECTIONS	
TABLES	DP02; DP05
GEOS	Census Tract 67; Ingham County; Michigan; Lansing city, Michigan; Ingham County, Michigan
EXCLUDED COLUMNS	Ingham County, Michigan!!Margin of Error
	Ingham County, Michigan!!Percent Margin of Error
	Census Tract 67; Ingham County; Michigan!!Margin of Error
	Census Tract 67; Ingham County; Michigan!!Percent Margin of Error
	Lansing city, Michigan!!Margin of Error
	Lansing city, Michigan!!Percent Margin of Error

APPLIED FILTERS	None
APPLIED SORTS	None
PIVOT & GROUPING	
PIVOT COLUMNS	None
PIVOT MODE	Off
ROW GROUPS	None
VALUE COLUMNS	None
WEB ADDRESS	https://data.census.gov/table/ACSDP5Y2022.DP02?q=dp02%20dp05&g=050XX00US26065_1400000US26065006700_160XX00US2646000&moe=false
TABLE NOTES	
	Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, the decennial census is the official source of population totals for April 1st of each decennial year. In between censuses, the Census Bureau's Population Estimates Program produces and disseminates the official estimates of the population for the nation, states, counties, cities, and towns and estimates of housing units for states and counties.
	Information about the American Community Survey (ACS) can be found on the ACS website. Supporting documentation including code lists, subject definitions, data accuracy, and statistical testing, and a full list of ACS tables and table shells (without estimates) can be found on the Technical Documentation section of the ACS website. Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.
	Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

	Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see ACS Technical Documentation). The effect of nonsampling error is not represented in these tables.
	Ancestry listed in this table refers to the total number of people who responded with a particular ancestry; for example, the estimate given for German represents the number of people who listed German as either their first or second ancestry. This table lists only the largest ancestry groups; see the Detailed Tables for more categories. Race and Hispanic origin groups are not included in this table because data for those groups come from the Race and Hispanic origin questions rather than the ancestry question (see Demographic Table).
	Data for year of entry of the native population reflect the year of entry into the U.S. by people who were born in Puerto Rico or U.S. Island Areas or born outside the U.S. to a U.S. citizen parent and who subsequently moved to the U.S.
	Methodological changes to citizenship edits may have affected citizenship data for those born in American Samoa. Users should be aware of these changes when using 2018 data or multi-year data containing data from 2018. For more information, see: American Samoa Citizenship User Note.
	The Census Bureau introduced a new set of disability questions in the 2008 ACS questionnaire. Accordingly, comparisons of disability data from 2008 or later with data from prior years are not recommended. For more information on these questions and their evaluation in the 2006 ACS Content Test, see the Evaluation Report Covering Disability.
	The category "with a broadband Internet subscription" refers to those who said "Yes" to at least one of the following types of Internet subscriptions: Broadband such as cable, fiber optic, or DSL; a cellular data plan; satellite; a fixed wireless subscription; or other non-dial up subscription types.
	An Internet "subscription" refers to a type of service that someone pays for to access the Internet such as a cellular data plan, broadband such as cable, fiber optic or DSL, or other type of service. This will normally refer to a service that someone is billed for directly for Internet alone or sometimes as part of a bundle.

	With a computer includes those who said "Yes" to at least one of the following types of computers: Desktop or laptop; smartphone; tablet or other portable wireless computer; or some other type of computer.
	The "children of the householder" and "own children of the householder" concepts are combined in these estimates. For more information, please see the following User Note.
	The 2018-2022 American Community Survey (ACS) data generally reflect the March 2020 Office of Management and Budget (OMB) delineations of metropolitan and micropolitan statistical areas. In certain instances, the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB delineation lists due to differences in the effective dates of the geographic entities.
	Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on 2020 Census data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.
	Explanation of Symbols:- The estimate could not be computed because there were an insufficient number of sample observations. For a ratio of medians estimate, one or both of the median estimates falls in the lowest interval or highest interval of an open-ended distribution. For a 5-year median estimate, the margin of error associated with a median was larger than the median itself.N The estimate or margin of error cannot be displayed because there were an insufficient number of sample cases in the selected geographic area. (X) The estimate or margin of error is not applicable or not available.median- The median falls in the lowest interval of an open-ended distribution (for example "2,500-")median+ The median falls in the highest interval of an open-ended distribution (for example "250,000+").** The margin of error could not be computed because there were an insufficient number of sample observations.*** The margin of error could not be computed because the median falls in the lowest interval or highest interval of an open-ended distribution.***** A margin of error is not appropriate because the corresponding estimate is controlled to an independent population or housing estimate. Effectively, the corresponding estimate has no sampling error and the margin of error may be treated as zero.
COLUMN NOTES	None

	Ingham County, Michigan		Census Tract 67; Ingham County; Michigan	
Label	**Estimate**	**Percent**	**Estimate**	**Percent**
HOUSEHOLDS BY TYPE				
Total households	115,648	115,648	2,337	2,337
Married-couple household	44,062	38.1%	706	30.2%
With children of the householder under 18 years	16,445	14.2%	119	5.1%
Cohabiting couple household	10,097	8.7%	142	6.1%
With children of the householder under 18 years	2,928	2.5%	51	2.2%
Male householder, no spouse/partner present	26,256	22.7%	544	23.3%
With children of the householder under 18 years	1,390	1.2%	26	1.1%
Householder living alone	19,589	16.9%	507	21.7%
65 years and over	4,700	4.1%	123	5.3%
Female householder, no spouse/partner present	35,233	30.5%	945	40.4%
With children of the householder under 18 years	4,950	4.3%	113	4.8%
Householder living alone	20,990	18.1%	578	24.7%
65 years and over	8,574	7.4%	93	4.0%
Households with one or more people under 18 years	28,408	24.6%	405	17.3%
Households with one or more people 65 years and over	29,539	25.5%	400	17.1%
Average household size	2.30	(X)	2.01	(X)
Average family size	3.02	(X)	2.64	(X)
RELATIONSHIP				
Population in households	265,430	265,430	4,704	4,704
Householder	115,648	43.6%	2,337	49.7%

Table: ACSDP5Y2022.DP02

	Lansing city, Michigan	
Label	**Estimate**	**Percent**
HOUSEHOLDS BY TYPE		
Total households	50,137	50,137
Married-couple household	14,521	29.0%
With children of the householder under 18 years	5,123	10.2%
Cohabiting couple household	5,189	10.3%
With children of the householder under 18 years	1,600	3.2%
Male householder, no spouse/partner present	12,867	25.7%
With children of the householder under 18 years	726	1.4%
Householder living alone	10,083	20.1%
65 years and over	2,060	4.1%
Female householder, no spouse/partner present	17,560	35.0%
With children of the householder under 18 years	3,316	6.6%
Householder living alone	10,496	20.9%
65 years and over	3,531	7.0%
Households with one or more people under 18 years	12,304	24.5%
Households with one or more people 65 years and over	11,387	22.7%
Average household size	2.23	(X)
Average family size	3.11	(X)
RELATIONSHIP		
Population in households	112,028	112,028
Householder	50,137	44.8%

	Ingham County, Michigan		Census Tract 67; Ingham County; Michigan	
Label	**Estimate**	**Percent**	**Estimate**	**Percent**
Spouse	44,212	16.7%	623	13.2%
Unmarried partner	9,950	3.7%	151	3.2%
Child	67,951	25.6%	988	21.0%
Other relatives	11,434	4.3%	120	2.6%
Other nonrelatives	16,235	6.1%	485	10.3%
MARITAL STATUS				
Males 15 years and over	115,044	115,044	1,818	1,818
Never married	53,451	46.5%	1,037	57.0%
Now married, except separated	46,965	40.8%	690	38.0%
Separated	834	0.7%	23	1.3%
Widowed	2,566	2.2%	0	0.0%
Divorced	11,228	9.8%	68	3.7%
Females 15 years and over	121,508	121,508	2,009	2,009
Never married	50,838	41.8%	939	46.7%
Now married, except separated	47,106	38.8%	711	35.4%
Separated	1,253	1.0%	147	7.3%
Widowed	7,713	6.3%	24	1.2%
Divorced	14,598	12.0%	188	9.4%
FERTILITY				
Number of women 15 to 50 years old who had a birth in the past 12 months	3,186	3,186	37	37
Unmarried women (widowed, divorced, and never married)	1,135	35.6%	0	0.0%
Per 1,000 unmarried women	22	(X)	0	(X)

	Lansing city, Michigan	
Label	**Estimate**	**Percent**
Spouse	14,755	13.2%
Unmarried partner	5,294	4.7%
Child	30,659	27.4%
Other relatives	5,970	5.3%
Other nonrelatives	5,213	4.7%
MARITAL STATUS		
Males 15 years and over	44,260	44,260
Never married	21,222	47.9%
Now married, except separated	15,686	35.4%
Separated	478	1.1%
Widowed	938	2.1%
Divorced	5,936	13.4%
Females 15 years and over	46,836	46,836
Never married	19,662	42.0%
Now married, except separated	16,042	34.3%
Separated	823	1.8%
Widowed	3,184	6.8%
Divorced	7,125	15.2%
FERTILITY		
Number of women 15 to 50 years old who had a birth in the past 12 months	1,396	1,396
Unmarried women (widowed, divorced, and never married)	526	37.7%
Per 1,000 unmarried women	26	(X)

	Ingham County, Michigan		Census Tract 67; Ingham County; Michigan	
Label	Estimate	Percent	Estimate	Percent
Per 1,000 women 15 to 50 years old	42	(X)	27	(X)
Per 1,000 women 15 to 19 years old	12	(X)	0	(X)
Per 1,000 women 20 to 34 years old	55	(X)	0	(X)
Per 1,000 women 35 to 50 years old	35	(X)	114	(X)
GRANDPARENTS				
Number of grandparents living with own grandchildren under 18 years	3,650	3,650	0	0
Grandparents responsible for grandchildren	1,428	39.1%	0	-
Years responsible for grandchildren				
Less than 1 year	474	13.0%	0	-
1 or 2 years	316	8.7%	0	-
3 or 4 years	227	6.2%	0	-
5 or more years	411	11.3%	0	-
Number of grandparents responsible for own grandchildren under 18 years	1,428	1,428	0	0
Who are female	831	58.2%	0	-
Who are married	939	65.8%	0	-
SCHOOL ENROLLMENT				
Population 3 years and over enrolled in school	90,249	90,249	1,113	1,113
Nursery school, preschool	3,325	3.7%	81	7.3%
Kindergarten	3,042	3.4%	0	0.0%

	Lansing city, Michigan	
Label	Estimate	Percent
Per 1,000 women 15 to 50 years old	47	(X)
Per 1,000 women 15 to 19 years old	21	(X)
Per 1,000 women 20 to 34 years old	61	(X)
Per 1,000 women 35 to 50 years old	33	(X)
GRANDPARENTS		
Number of grandparents living with own grandchildren under 18 years	1,828	1,828
Grandparents responsible for grandchildren	821	44.9%
Years responsible for grandchildren		
Less than 1 year	249	13.6%
1 or 2 years	165	9.0%
3 or 4 years	222	12.1%
5 or more years	185	10.1%
Number of grandparents responsible for own grandchildren under 18 years	821	821
Who are female	475	57.9%
Who are married	429	52.3%
SCHOOL ENROLLMENT		
Population 3 years and over enrolled in school	28,659	28,659
Nursery school, preschool	1,655	5.8%
Kindergarten	1,137	4.0%

	Ingham County, Michigan		Census Tract 67; Ingham County; Michigan	
Label	**Estimate**	**Percent**	**Estimate**	**Percent**
Elementary school (grades 1-8)	23,522	26.1%	305	27.4%
High school (grades 9-12)	12,589	13.9%	241	21.7%
College or graduate school	47,771	52.9%	486	43.7%
EDUCATIONAL ATTAINMENT				
Population 25 years and over	174,119	174,119	2,928	2,928
Less than 9th grade	3,844	2.2%	43	1.5%
9th to 12th grade, no diploma	7,330	4.2%	235	8.0%
High school graduate (includes equivalency)	37,312	21.4%	711	24.3%
Some college, no degree	38,787	22.3%	649	22.2%
Associate's degree	16,083	9.2%	126	4.3%
Bachelor's degree	38,966	22.4%	769	26.3%
Graduate or professional degree	31,797	18.3%	395	13.5%
High school graduate or higher	162,945	93.6%	2,650	90.5%
Bachelor's degree or higher	70,763	40.6%	1,164	39.8%
VETERAN STATUS				
Civilian population 18 years and over	226,941	226,941	3,717	3,717
Civilian veterans	11,338	5.0%	91	2.4%
DISABILITY STATUS OF THE CIVILIAN NONINSTITUTIONALIZED POPULATION				
Total Civilian Noninstitutionalized Population	280,876	280,876	4,737	4,737
With a disability	38,077	13.6%	777	16.4%

Table: ACSDP5Y2022.DP02

	Lansing city, Michigan	
Label	**Estimate**	**Percent**
Elementary school (grades 1-8)	10,475	36.6%
High school (grades 9-12)	5,679	19.8%
College or graduate school	9,713	33.9%
EDUCATIONAL ATTAINMENT		
Population 25 years and over	73,991	73,991
Less than 9th grade	2,864	3.9%
9th to 12th grade, no diploma	4,204	5.7%
High school graduate (includes equivalency)	18,440	24.9%
Some college, no degree	19,067	25.8%
Associate's degree	7,749	10.5%
Bachelor's degree	13,448	18.2%
Graduate or professional degree	8,219	11.1%
High school graduate or higher	66,923	90.4%
Bachelor's degree or higher	21,667	29.3%
VETERAN STATUS		
Civilian population 18 years and over	87,240	87,240
Civilian veterans	4,398	5.0%
DISABILITY STATUS OF THE CIVILIAN NONINSTITUTIONALIZED POPULATION		
Total Civilian Noninstitutionalized Population	112,744	112,744
With a disability	18,565	16.5%

	Ingham County, Michigan		Census Tract 67; Ingham County; Michigan	
Label	Estimate	Percent	Estimate	Percent
Under 18 years	55,343	55,343	1,020	1,020
With a disability	2,716	4.9%	0	0.0%
18 to 64 years	186,119	186,119	3,227	3,227
With a disability	22,131	11.9%	539	16.7%
65 years and over	39,414	39,414	490	490
With a disability	13,230	33.6%	238	48.6%
RESIDENCE 1 YEAR AGO				
Population 1 year and over	279,986	279,986	4,703	4,703
Same house	222,692	79.5%	3,189	67.8%
Different house (in the U.S. or abroad)	57,294	20.5%	1,514	32.2%
Different house in the U.S.	55,376	19.8%	1,460	31.0%
Same county	28,664	10.2%	1,047	22.3%
Different county	26,712	9.5%	413	8.8%
Same state	20,479	7.3%	397	8.4%
Different state	6,233	2.2%	16	0.3%
Abroad	1,918	0.7%	54	1.1%
PLACE OF BIRTH				
Total population	282,540	282,540	4,737	4,737
Native	255,857	90.6%	4,492	94.8%
Born in United States	253,679	89.8%	4,492	94.8%
State of residence	201,132	71.2%	3,182	67.2%
Different state	52,547	18.6%	1,310	27.7%
Born in Puerto Rico, U.S. Island areas, or born abroad to American parent(s)	2,178	0.8%	0	0.0%
Foreign born	26,683	9.4%	245	5.2%
U.S. CITIZENSHIP STATUS				
Foreign-born population	26,683	26,683	245	245
Naturalized U.S. citizen	11,286	42.3%	106	43.3%

	Lansing city, Michigan	
Label	Estimate	Percent
Under 18 years	25,695	25,695
With a disability	1,180	4.6%
18 to 64 years	72,918	72,918
With a disability	12,159	16.7%
65 years and over	14,131	14,131
With a disability	5,226	37.0%
RESIDENCE 1 YEAR AGO		
Population 1 year and over	111,798	111,798
Same house	92,037	82.3%
Different house (in the U.S. or abroad)	19,761	17.7%
Different house in the U.S.	19,464	17.4%
Same county	11,226	10.0%
Different county	8,238	7.4%
Same state	6,067	5.4%
Different state	2,171	1.9%
Abroad	297	0.3%
PLACE OF BIRTH		
Total population	112,986	112,986
Native	101,869	90.2%
Born in United States	101,113	89.5%
State of residence	81,044	71.7%
Different state	20,069	17.8%
Born in Puerto Rico, U.S. Island areas, or born abroad to American parent(s)	756	0.7%
Foreign born	11,117	9.8%
U.S. CITIZENSHIP STATUS		
Foreign-born population	11,117	11,117
Naturalized U.S. citizen	4,489	40.4%

	Ingham County, Michigan		Census Tract 67; Ingham County; Michigan	
Label	**Estimate**	**Percent**	**Estimate**	**Percent**
Not a U.S. citizen	15,397	57.7%	139	56.7%
YEAR OF ENTRY				
Population born outside the United States	28,861	28,861	245	245
Native	2,178	2,178	0	0
Entered 2010 or later	449	20.6%	0	-
Entered before 2010	1,729	79.4%	0	-
Foreign born	26,683	26,683	245	245
Entered 2010 or later	12,409	46.5%	92	37.6%
Entered before 2010	14,274	53.5%	153	62.4%
WORLD REGION OF BIRTH OF FOREIGN BORN				
Foreign-born population, excluding population born at sea	26,683	26,683	245	245
Europe	2,603	9.8%	0	0.0%
Asia	15,691	58.8%	116	47.3%
Africa	3,555	13.3%	0	0.0%
Oceania	33	0.1%	0	0.0%
Latin America	4,041	15.1%	62	25.3%
Northern America	760	2.8%	67	27.3%
LANGUAGE SPOKEN AT HOME				
Population 5 years and over	267,417	267,417	4,214	4,214
English only	232,474	86.9%	3,701	87.8%
Language other than English	34,943	13.1%	513	12.2%
Speak English less than "very well"	10,877	4.1%	126	3.0%
Spanish	8,990	3.4%	253	6.0%
Speak English less than "very well"	2,392	0.9%	20	0.5%

	Lansing city, Michigan	
Label	**Estimate**	**Percent**
Not a U.S. citizen	6,628	59.6%
YEAR OF ENTRY		
Population born outside the United States	11,873	11,873
Native	756	756
Entered 2010 or later	186	24.6%
Entered before 2010	570	75.4%
Foreign born	11,117	11,117
Entered 2010 or later	5,194	46.7%
Entered before 2010	5,923	53.3%
WORLD REGION OF BIRTH OF FOREIGN BORN		
Foreign-born population, excluding population born at sea	11,117	11,117
Europe	680	6.1%
Asia	4,631	41.7%
Africa	2,590	23.3%
Oceania	7	0.1%
Latin America	2,899	26.1%
Northern America	310	2.8%
LANGUAGE SPOKEN AT HOME		
Population 5 years and over	104,975	104,975
English only	89,661	85.4%
Language other than English	15,314	14.6%
Speak English less than "very well"	5,621	5.4%
Spanish	5,540	5.3%
Speak English less than "very well"	1,875	1.8%

	Ingham County, Michigan		Census Tract 67; Ingham County; Michigan	
Label	Estimate	Percent	Estimate	Percent
Other Indo-European languages	9,325	3.5%	10	0.2%
Speak English less than "very well"	2,284	0.9%	0	0.0%
Asian and Pacific Islander languages	11,749	4.4%	250	5.9%
Speak English less than "very well"	4,628	1.7%	106	2.5%
Other languages	4,879	1.8%	0	0.0%
Speak English less than "very well"	1,573	0.6%	0	0.0%
ANCESTRY				
Total population	282,540	282,540	4,737	4,737
American	9,254	3.3%	153	3.2%
Arab	3,431	1.2%	19	0.4%
Czech	1,262	0.4%	0	0.0%
Danish	1,039	0.4%	54	1.1%
Dutch	6,527	2.3%	36	0.8%
English	31,571	11.2%	388	8.2%
French (except Basque)	7,648	2.7%	196	4.1%
French Canadian	3,253	1.2%	74	1.6%
German	51,123	18.1%	206	4.3%
Greek	1,348	0.5%	22	0.5%
Hungarian	1,438	0.5%	8	0.2%
Irish	30,208	10.7%	277	5.8%
Italian	10,831	3.8%	107	2.3%
Lithuanian	712	0.3%	0	0.0%
Norwegian	1,859	0.7%	18	0.4%
Polish	13,871	4.9%	375	7.9%
Portuguese	237	0.1%	0	0.0%

	Lansing city, Michigan	
Label	Estimate	Percent
Other Indo-European languages	3,372	3.2%
Speak English less than "very well"	1,244	1.2%
Asian and Pacific Islander languages	3,042	2.9%
Speak English less than "very well"	1,239	1.2%
Other languages	3,360	3.2%
Speak English less than "very well"	1,263	1.2%
ANCESTRY		
Total population	112,986	112,986
American	3,616	3.2%
Arab	1,443	1.3%
Czech	600	0.5%
Danish	293	0.3%
Dutch	2,283	2.0%
English	9,562	8.5%
French (except Basque)	2,423	2.1%
French Canadian	1,499	1.3%
German	17,428	15.4%
Greek	438	0.4%
Hungarian	309	0.3%
Irish	10,537	9.3%
Italian	3,879	3.4%
Lithuanian	95	0.1%
Norwegian	686	0.6%
Polish	5,362	4.7%
Portuguese	12	0.0%

	Ingham County, Michigan		Census Tract 67; Ingham County; Michigan	
Label	**Estimate**	**Percent**	**Estimate**	**Percent**
Russian	1,377	0.5%	24	0.5%
Scotch-Irish	1,677	0.6%	26	0.5%
Scottish	6,006	2.1%	52	1.1%
Slovak	470	0.2%	0	0.0%
Subsaharan African	4,304	1.5%	0	0.0%
Swedish	4,442	1.6%	0	0.0%
Swiss	873	0.3%	0	0.0%
Ukrainian	818	0.3%	0	0.0%
Welsh	1,866	0.7%	74	1.6%
West Indian (excluding Hispanic origin groups)	1,034	0.4%	0	0.0%
COMPUTERS AND INTERNET USE				
Total households	115,648	115,648	2,337	2,337
With a computer	109,515	94.7%	2,232	95.5%
With a broadband Internet subscription	101,946	88.2%	2,067	88.4%

	Lansing city, Michigan	
Label	Estimate	Percent
Russian	528	0.5%
Scotch-Irish	532	0.5%
Scottish	2,123	1.9%
Slovak	135	0.1%
Subsaharan African	3,104	2.7%
Swedish	1,442	1.3%
Swiss	316	0.3%
Ukrainian	175	0.2%
Welsh	783	0.7%
West Indian (excluding Hispanic origin groups)	905	0.8%
COMPUTERS AND INTERNET USE		
Total households	50,137	50,137
With a computer	47,144	94.0%
With a broadband Internet subscription	43,752	87.3%

FAIR HOUSING ACCOMMODATIONS, MODIFICATIONS & SENSITIVITY SOLUTIONS

An estimated _____________violations and _______________________complaints.

Number one complaint regarding
_________________________.

Disparate Impact

____

____

____

The History of the Laws

1. **Civil Rights Act of 1866** –Declares that all persons born in the United States… shall have the same rights in every state and territory to inherit, purchase, lease, sell, hold and convey real and personal property…as is enjoyed by white citizens.

2. **Civil Rights Act of 1968** – Also, known as the "Fair Housing Act" – established the laws designed to prevent discrimination in all housing transaction.

What does the law state?

Based on Race, color, religion, national origin, sex, disability or familial status…
It is illegal to…

1. Refuse to rent or sell housing
2. Refuse to negotiate for housing (execute, enter into or sign)
3. Make housing unavailable
4. Deny a dwelling
5. Set different terms, conditions or privileges
6. Provide different services or facilities
7. Falsely deny that housing is available
8. For profit, persuade owners to sell or rent (Blockbusting)
9. Show apartments only in certain areas or neighborhoods (Steering)
10. Threaten, coerce, intimidate, or interfere with anyone exercising a fair housing right or assisting others who exercise that right.
11. Advertise or make any statement that indicates a limitation or preferenc

Exemptions

In some cases, the Fair Housing Act (FHA) exempts:

- Owner-occupied buildings with no more than four units.
- Single-family houses sold or rented without a broker.
- Houses operated by private organizations and clubs that limit occupancy to members.

However, there is no exemption if

- You advertise or
- You use a real estate agent or broker

TRUE OR FALSE: It is against the law to discriminate.

Federally Protected Classes

- Race
- Color
- Religion
- National Origin
- Sex (Gender) - 1974
- Familial Status - 1988
- Disability - 1988

F________________________________

R________________________________

E________________________________

S________________________________

H________________________________

C________________________________

O________________________________

R________________________________

N________________________________

State & Local Protected Classes

ADA (Americans with Disabilities Act)

Any physical or mental impairment that substantially limits one or more <u>major life</u> <u>activities</u> such as

____

____

You are considered disabled if you …

- Have a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation that substantially limits one or more major life activities
- Have a record of such a disability
- Are regarded as having such a disability

Three Types of Disabilities

1. Physical Disabilities you ______________________________ see.
2. Physical Disabilities you ______________________________ see.
3. ____________________ disabilities.

Hoarding In Multi Family

____

____

____

Accommodation or Modifications

A **Reasonable ACCOMMODATION** may be a change in the___________________________, services, practices, or policies when such accommodation may be necessary for a disabled person to enjoy the property as a non-disabled person.

A Reasonable MODIFICATION is a ________________________________ change to the property that enables a disabled person full use of the premises. The modifications are not limited to the interior of the apartment, but also include public and common use areas.

TRUE OR FALSE: As an owner or management agent, if a resident requests a reasonable accommodation modification due to a disability, you have the right to ask for details of disability.

Process

1. A resident, family member or someone acting on behalf of the resident makes a request for an accommodation.

2. The request may be written or oral.

3. A Request for Reasonable Accommodation Form may be used when the disability is not obvious. However, you cannot require the form.

4. You do not have the right to ask what the disability is.

5. You may request verification from a healthcare/social services provider or any professional that has knowledge of the nexus between the disability and the requested accommodation.

6. Maintain a Reasonable Accommodation Log.

Parking Accommodations

- There are different needs related to parking.
- Find out what the resident is looking to accomplish and how they think you might be best able to make that happen.
- Is the need location based?
- Does the resident need a regular sized parking space, or one that is larger for a van, wheelchair, or walker use?
- Does the resident want the parking space designated as "handicapped parking?"
- Does the resident want the parking space designated as "reserved?"
- Does the resident also need a curb cut or ramp if one is not already in place?

"There is nothing wrong with her. Why does she get to park there?"

"Because as always we are complying with the ____".

Service Animals

TRUE OR FALSE: If a resident needs a service animal to assist them due to a disability, the management can impose their breed and weight restrictions on the animal.

TRUE OR FALSE: If a resident needs a service animal to assist them due to a disability, the management must waive pet deposits, fees, and monthly rents for the service animal.

TRUE OR FALSE: Under the ADA and FHA, any type of animal may qualify as a service animals.

ADA

- Defines "service animal" as a dog individually trained to do work or perform tasks for the benefit of an individual with a disability
- Other animals, whether wild or domestic, do not qualify as service animals.

FAIR HOUSING

- Broader view of service animals
- Species other than dogs, with or without training
- Animals that provide emotional support

TRUE OR FALSE: Allowing a live-in aide to live with a disabled person even though the aide exceeds the occupancy limit for the unit is an example of making an accommodation for a disabled person.

Who Pays for Modifications

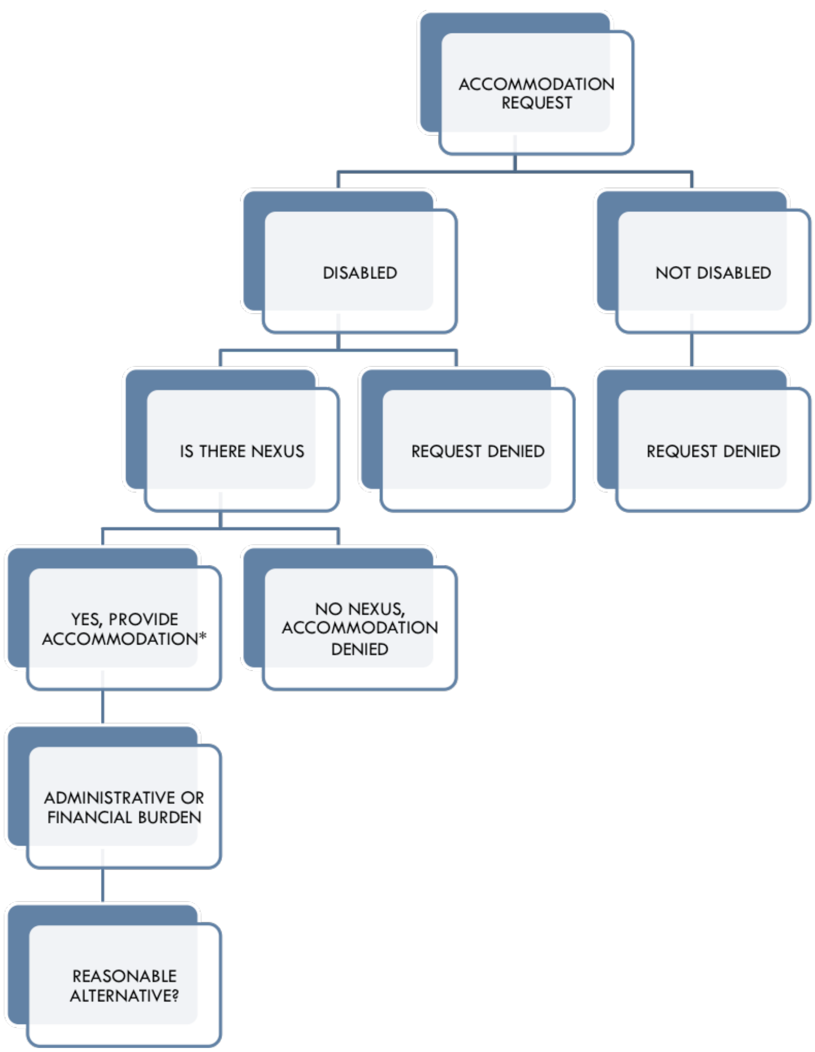
In most cases, the resident:

- is responsible for the cost of modifications made to the property
- is responsible for acquiring proper permits and ensuring work is done properly
- may be required to pay for removal of the alteration if the change interferes with a future resident's ability to enjoy the property.

Classifications of Modifications

- Modifications that do not have to be restored to their original condition
- Modifications that need to be restored to the original condition but do not require establishment of an escrow account
- Modifications that are relatively expensive and extensive that need to be restored and require an escrow account.

Reasonable Burden Test:



ENCOURAGING DIVERSITY, INCLUSION & SENSITIVITY

- Learn about beliefs of others.
- Value uniqueness among your others.
- Watch for changes in relationships.
- Discussions or workshops.
- Behave proactively.
- Hold everyone accountable.
- Speak up.
- Include the entire team.

CHANGING YOUR PERSONAL APPROACH

1. Collect ____________________.
2. Facts vs opinions/theories.
3. Make judgment based only on ________________________.
4. Try to continue expanding your opinion of the person's potential.

IDENTIFYING HARRASSMENT

- Racial slurs
- Homophobic remarks
- Subtle
- Jokes & pranks
- Threats, Intimidation & hostile acts
- Verbal, physical, written & graphic material

DEFINING SEXUAL HARRASSMENT

- Exhibiting sexual material.
- Continued, unwanted invitations for a date.
- Staring or stalking.
- Sexually based insults.
- Distasteful communication.
- Unwelcome touching.
- Comments, jokes or innuendos related to sex.
- Blatant, unsolicited requests for sex.
- Prying into an individual's private life.
- Stalking.

PREVENTING & DISCOURAGING DISCRIMINATION AND HARASSMENT

Actions
Anti-discrimination, anti-harassment & other policies.
Know the laws.
Speak up!
Understand the unique needs of individuals.

Preventing and Addressing Sexual and Other Discriminatory Harassment in Housing

Fair Housing Training
For Private Housing Owners
And Managers Participating
in Voucher Programs

Alexandria Lippincott

Casey Weissman-Vermeulen

Fair Housing Enforcement, Office of General Counsel
U.S. Department of Housing and Urban Development

and

Megan K. Whyte De Vasquez

Housing and Civil Enforcement, Civil Rights Division
U.S. Department of Justice

Trial Attorneys

- **Explain** how sexual and other types of discriminatory harassment violate the ***Fair Housing Act.***
- **Inform** you, housing owners and managers, about your responsibilities for preventing harassment in your properties and for helping to correct and end it when it does occur.
- **Use** hypothetical scenarios to learn how to recognize and properly respond to sexual harassment in housing.
- **Identify** steps that you (and any employees or agents) should take to help prevent sexual harassment and help victims of harassment.

The Fair Housing Act:

- **Prohibits discrimination in housing** and housing-related services and transactions because of *race, color, religion, sex, national origin, familial status, or disability.*

- **Prohibits retaliation against someone** who has made a complaint about discrimination or otherwise exercised his or her fair housing rights or who has aided someone else in doing so.

This training focuses on
SEXUAL HARASSMENT
(i.e., discrimination because of sex).

But harassment because of:

- race
- color
- religion
- national origin
- familial status
- disability

also violates the **Fair Housing Act.**

Sexual harassment in housing can take many different forms:

- It can take the form of unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.
- It also can take the form of offensive remarks, insults, or other hostile behavior because of a person's sex.
- It can consist of oral, written, or other conduct and does not require physical contact between the harasser and victim.

- **You** must ensure your housing is free from discrimination. **All owners and managers, as well as their agents and employees,** are responsible for helping meet this obligation.
- **Owners and managers** are responsible for establishing and enforcing anti-harassment policies.
- **You and your employees** must know what to do if you become aware of housing harassment by another employee or by one tenant against another.
- **An owner** should foster a sense of investment and openness among staff – staff must be encouraged to speak up and be assured that they will be protected from retaliation for doing so.

- **When a tenant is sexually harassed,** the property owner and/or management company may be liable under the ***Fair Housing Act***.
- **Property management employees** can also be liable.
- **Liability for sexual harassment** can arise in multiple ways – we'll discuss them later.

The Hypothetical: Jane, John, and the Terrace View Apartments

We are going to use a hypothetical to illustrate how owner and management company liability for sexual harassment can arise. As we go through each part of the hypothetical, we will discuss:

- **What happens;**
- **Why the conduct is harassment;** and
- **What went wrong** that allowed the harassment to happen.
- We'll also discuss what owners and/or property management employees must do to **correct and end** the harassment, the **consequences for inaction**, and **best practices** for addressing and preventing harassment.

Jane, who has a Housing Choice Voucher, rents an apartment at the Terrace View Apartments. Terrace View is owned by Julie and David Smith and managed by ABC Management Company.

Jane submits a maintenance request to fix a leak under her kitchen sink.

John, ABC's maintenance man, responds to the request.

When fixing the sink, John asks Jane if she has a boyfriend. Jane says that's none of his business. He responds by saying she is "really hot" and that "we should hang out."

Jane calls Laura, ABC's property manager at Terrace View, and leaves a voicemail explaining that John "came on to her" and "made her uncomfortable."

Jane doesn't hear back from anyone at the management company.

- John’s conduct may violate ABC’s employee conduct rules but – as we’ll discuss later – might not constitute a ***Fair Housing Act*** violation ***yet.***

- However, if Laura, the property manager, does nothing, John’s conduct will likely get worse – to the point that it ***does*** violate the ***Fair Housing Act***.

The property manager must take **effective steps** to ensure that the harassment stops immediately and does not progress. **Steps she should take include:**

- informing Jane of her right to file a ***Fair Housing Act*** complaint at any time;
- initiating an investigation into Jane's allegations; and
- encouraging Jane to report any other harassment that she experiences.

If the property manager doesn't have the authority to investigate or take corrective action, she must refer Jane's complaint to another ABC employee who does, or to the property owner.

Even if ABC is unsure who is telling the truth, it should **warn John that harassing conduct is prohibited.**

ABC and/or the owner must ensure than any corrective action is effective in stopping John's unwelcome conduct.

Best Practices:

How can you, as an owner or property manager, ensure complaints don’t “fall through the cracks”?

- Establish policies and procedures that make it easy for tenants to make a complaint.
- Identify who is responsible for responding to complaints. Make sure the designated complaint coordinator processes complaints quickly and appropriately.
- Document and maintain records of complaints, investigations, and any corrective actions taken.
- Follow up with victims to ensure corrective action was effective; take further corrective action if it wasn’t.

Best Practices

You should collect this information when taking a complaint:

- Victim’s name and contact information for follow up;
- Summary of what happened (tell victim to save any evidence – e.g., texts, photos, voice mail, letters, notes, journals, etc.);
- Names of harassers, witnesses, and other possible victims, if known;
- Property name, address, and unit number; and
- Dates, times, and locations of harassment.

A week later, **John uses his master key to enter Jane's apartment at night,** without knocking.

Jane is home and is startled by his entry. He tells Jane he's there to check on the sink, even though the sink was fixed a week ago and she had not made another maintenance call.

In the kitchen, John touches Jane on her buttocks, points to a photo of Jane on the fridge and says, "Wow, you look hot in that bikini. You should put that bikini on for me right now." Jane refuses and tells John he needs to leave. John leaves, saying he was "just kidding."

Jane calls the property manager, Laura, again and explains that John entered her apartment without knocking, touched her, and made "inappropriate comments" about her body.

The property manager apologizes to Jane and tells her she will make sure "it doesn't happen again."

Jane doesn't hear further from the property manager.

- John's latest actions and comments now violate the ***Fair Housing Act*** because they are **severe** or **pervasive**.
- The property manager must take all actions necessary to ensure that John's unwelcome conduct stops immediately and that Jane is protected from any retaliation.

- Immediate interim action may be required even before any investigation is finished – for example, taking away John's master key, a temporary re-assignment, issuing a no-contact order, or special oversight or monitoring pending the conclusion of an investigation.

- A verbal reprimand to John is **grossly inadequate** given the severity of his actions.

- The property manager or another employee designated by the owner **must investigate**, tell Jane of her right to file a ***Fair Housing Act*** complaint, and ensure that corrective action is effective in stopping John's unwelcome conduct.

Best Practices:

Adopt an employee code of conduct that:

- prohibits harassment of applicants, tenants, and other employees or agents;
- provides for disciplinary actions for harassment, up to and including termination where necessary;
- encourages employees to report any inappropriate conduct they witness or hear about; and
- provides for discipline of employees who do not respond appropriately to harassment complaints.

If you learn that another employee is harassing a tenant or that one tenant is harassing another, you must take corrective action or report it to an appropriate supervisor.

Two weeks later, Jane's hot water heater stops working. She calls in an emergency maintenance request.

Jane gets a call from John, who says he is "too busy" to fix the water heater that day, but that he will find the time to fix it that evening if they could "test out the shower together."

Jane says "no!"

The water heater remains broken when Jane gets home that evening.

The next day, Jane calls the property manager to complain about the lack of hot water and that John was saying "inappropriate things" again.

The property manager tells Jane she will make sure that her water heater gets fixed by the end of the day. **The property manager doesn't inquire about or otherwise respond to Jane's complaint about John's inappropriate comments.**

John is sent to Jane's apartment and the water heater is repaired by the time Jane gets home.

John conditioned his repair of the water heater on Jane's agreeing to shower with him. This is sexual harassment that violates the **Fair Housing Act.**

- **The property manager should NOT have assigned John** to make the repair, given his prior harassing conduct.
- The owner, property manager, or other designated employee should have investigated Jane's complaint, stopped John's harassment, and ensured that Jane was protected from any retaliation.
  - Fixing the water heater isn't enough; the harassment needs to be stopped.
  - The owner and/or property manager must **enforce** employee standards of conduct against John: termination is appropriate.

The owner or the designated employee/agent should tell Jane of her right to file a ***Fair Housing Act*** complaint, and inform her of the steps taken to protect her from further harassment.

- The next week, Jane encounters John in the hallway of her apartment building.
- As Jane tries to walk past him, John says, “Hey, cutie” and touches Jane’s buttocks.
- Tired of the property manager’s inadequate response to her complaints about John, Jane contacts HUD to file a ***Fair Housing Act*** complaint against John, ABC Management Co., the property manager, and the owners.
- After Laura, the property manager, is notified of the complaint, she confronts Jane and tells her she’s going to evict her and make sure she loses her voucher unless Jane withdraws her complaint.

Retaliation against a person because he or she complained about being sexually harassed is prohibited by the ***Fair Housing Act***.

The property manager's threat of eviction and loss of voucher assistance is **illegal** retaliation.

- **What** is sexual harassment under the ***Fair Housing Act?***
- **Who** is liable for sexual harassment?
- **Additional best practices** that owners and property managers can adopt to prevent and/or stop sexual or other forms of discriminatory harassment.

Hostile Environment Harassment:

- **Unwelcome conduct** because of sex that is **sufficiently severe or pervasive** as to **interfere with** a person's ability to obtain, maintain, or use and enjoy housing or housing-related services.
- Can be created by a **single incident, if severe.**
- Violates the ***Fair Housing Act,*** even if there is no eviction, termination of assistance, increase in rent, withholding of repairs, or similar act.

Thinking back to our hypothetical scenario,

did John create a *hostile environment* for Jane?

The answer is **YES**.

His conduct created a hostile environment.

John's conduct created a hostile environment because it was:

- Unwelcome
- Severe or pervasive (or both), and
- Interfered with Jane's enjoyment of her home because:
  - He repeatedly asked to spend time with Jane, even after she showed she was not interested.
  - He entered Jane's apartment with a key without knocking and without a legitimate reason.
  - He made comments about her body and asked Jane to put on a bikini.
  - He touched Jane without permission.

Some of John's conduct by itself was severe enough to create a hostile housing environment, specifically, John's unwelcome entry into Jane's apartment without a legitimate reason.

Quid Pro Quo Harassment:

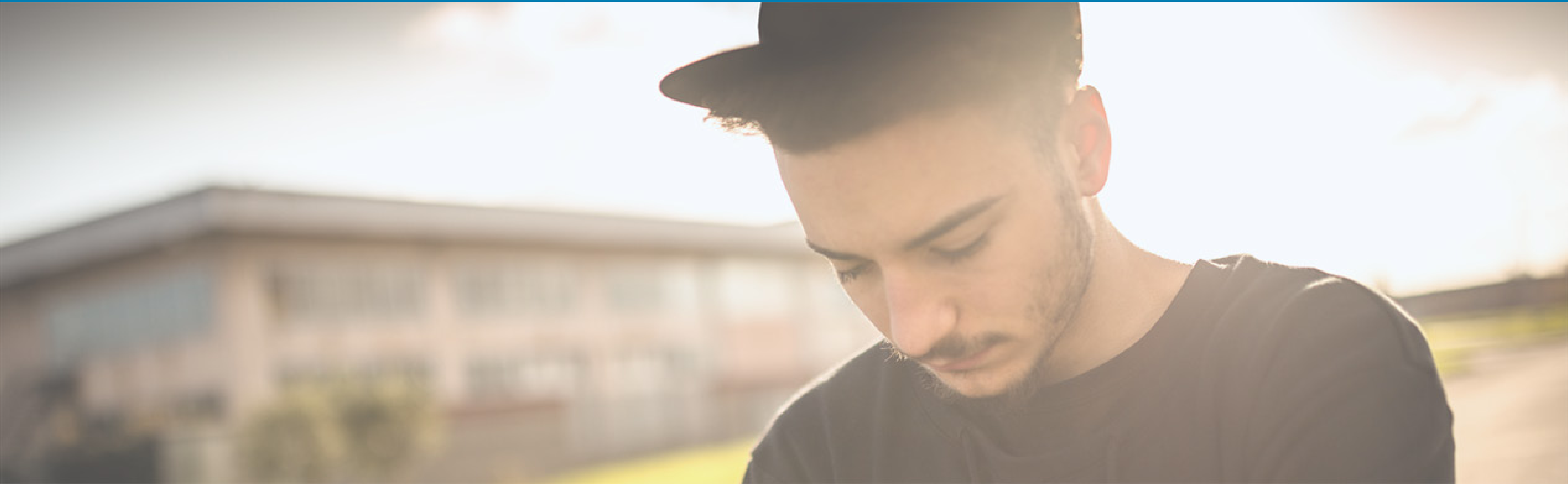
- Making a person's **submission to an unwelcome request** to engage in sexual conduct a **condition of** any aspect of obtaining or maintaining **housing or housing-related services.**
- Can be explicit or implied.
- A single quid pro quo act violates the ***Fair Housing Act.***

Did John commit *quid pro quo* harassment?

The answer is **YES**.

John committed quid pro quo harassment when:

- He refused to fix Jane's water heater unless she agreed to "test the shower out" with him.
- Even if Jane had agreed to participate in unwelcome conduct (showering with John in order to get her water heater fixed), it's still sexual harassment.



- **BOTH hostile environment** and **quid pro quo** harassment violate the **Fair Housing Act.**
- **EITHER** type can lead to liability for owners and property managers.

YES! Any owner or property management employee is liable for their own discriminatory conduct.

John violated the *Fair Housing Act* in two different ways:

- He created a *hostile housing environment* for Jane.
- He also engaged in *quid pro quo* harassment.

What about the Property Manager?

Would she be liable under the ***Fair Housing Act***?

YES! Property managers are liable when:

- They **engage** in harassment themselves; or
- They **fail to take actions within their power to stop harassment** by other employees/agents—such as subordinates or contractors—that **they knew or should have known about.**
- They are also liable if they **retaliate** against someone who complains about harassment.

What about the Property Manager?

Why, based on our scenario, is she liable?

- In our scenario, the property manager didn't engage in harassment herself. But she knew of John's harassment and did little or nothing to stop or correct it.
- As John's supervisor she could have, for example: given John a warning when Jane first complained, suspended him, or taken other action to address and stop his harassing conduct.
- She's also liable because she threatened to evict Jane in retaliation for Jane filing a fair housing complaint with HUD.

Would ABC Management Co. *AND* the property owner be liable for John's harassment?

YES. Owners *AND* property management companies are liable for:

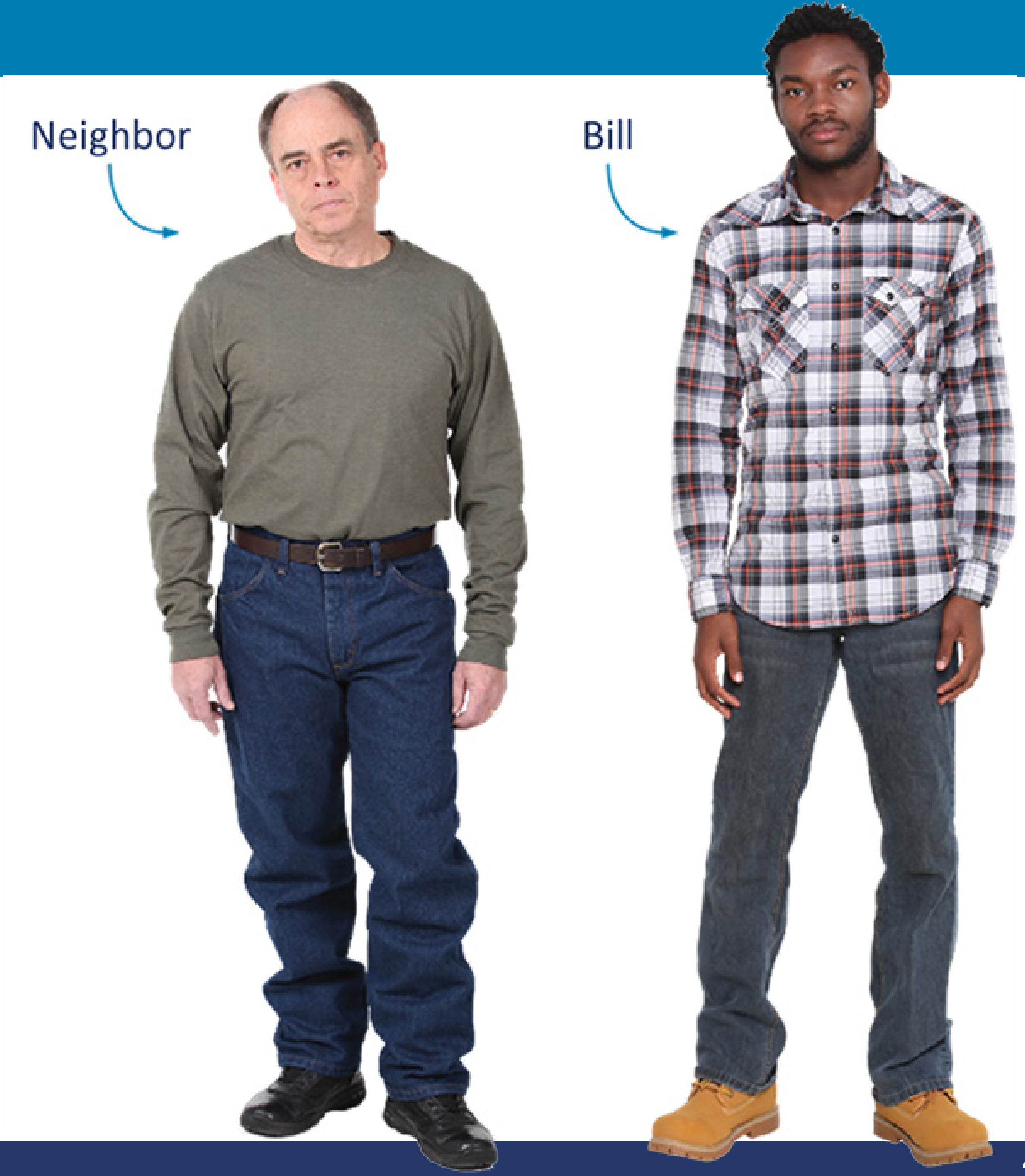
- **Harassment or retaliation committed by employees/agents, *even if they don't know about it*.**
  - This applies to **any** employee, regardless of position, and **any** agent, including contractors.
  - Here, ABC and the property owners, Julie and David Smith, are liable because both John, who harassed Jane, and the property manager, who retaliated against Jane, are their employees/agents.
- **Failing to take actions within their power** to stop harassment by their employees/agents that they **knew or should have known about**.
  - Here, the owners and ABC are both liable because they knew, through the property manager, of John's harassment and allowed it to continue without attempting to correct or end it.

- Property owners and their employees/agents may be held liable through **HUD's administrative enforcement process**. After Jane filed her fair housing complaint with HUD, HUD would investigate the case and could file a lawsuit on her behalf before an administrative law judge (ALJ).
  - The ALJ can issue an order imposing liability, requiring payment of monetary relief to Jane and penalties, and mandating other relief.
- Also, owners and their employees/agents may be held liable through **lawsuits brought by the Department of Justice in federal court**.
  - Such lawsuits often originate from HUD investigations, but also are brought by DOJ based on its authority to investigate possible pattern or practice violations of the ***Fair Housing Act***.

Bill, who is Black, lives in an apartment building.

For weeks, Bill's white neighbor curses at him. The neighbor uses racial slurs, tells Bill that Blacks shouldn't be allowed to live there, spits at him, and repeatedly tells Bill to "go back to Africa."

Bill complains to the property owner, who does nothing.



In this scenario, one tenant is racially harassing another.

- Owners and their employees/agents are liable for **failing to take actions within their power** to stop one tenant from harassing another because of race, sex, disability, or any another protected characteristic if they **knew or should have known about it.**
  - "Should have known" means the owner had info that would lead a reasonable person to conclude that harassment was occurring.
  - But (unlike with harassment by agents/employees) owners cannot be liable for tenant-on-tenant harassment if they did not know or have reason to know about it.
  - An owner's corrective action must not adversely impact the harassed tenant.
- The neighbor who harassed Bill is also liable for his own discriminatory conduct.

Best Practices:

Enforce lease provisions and other rules.

- Issue verbal and written warnings and notices of lease or rule violations to the harassing tenant.
- Evict a harassing tenant if necessary.
- Do not take adverse action or retaliate against the harassed tenant.

- Harassment of a tenant or applicant due to disability **violates the Fair Housing Act.**
- For example, **property owners and managers could be liable** for not taking appropriate corrective action in response to a complaint from an applicant with a disability that an employee harassed him because of his disability multiple times during the application process.

Property owners and property management employees may be required to pay damages to victims for:

- **Psychological** harm;
- **Physical** harm;
- **Economic** harm.

- Victim’s family members may be entitled to damage payments.

Even More Consequences of **Fair Housing Act** Liability

- Civil penalties up to nearly **$103,000 for a first violation.**

- A public housing agency may take action for violation of the Housing Assistance Payments (HAP) contract when an owner or property manager engages in or fails to correct harassment. For example, a PHA may:

  - **Abate, suspend, or terminate** the HAP contract; **prohibit** the owner's future participation in the PHA's housing programs, or

  - Ask HUD to enforce a **limited denial of participation (LDP), suspension, or debarment.**

Enforcement by the

U.S. Department of Justice

Civil Rights Division

United States v. Webb *Filed in 2016 in federal court in the Eastern District of Missouri*

- **Mr. Webb harassed tenants while managing rental properties that he owned with his wife.**
- **Settlement terms:**
  - $600,000 in monetary damages for 15 women.
  - Prohibited Mr. Webb from entering or managing the rental properties.
  - Webb agreed to sell or transfer ownership of all residential rental properties within 180 days.

HOUSINGWIRE

St. Louis landlords reach $625,000 settlement over 20 years of alleged sexual harassment

Accused of offering cheaper rent and other benefits in exchange for sexual favors

United States v. Encore Management Co. *Filed in 2014, Southern District of West Virginia*

- District manager and maintenance worker harassed tenants.
- Property manager engaged in retaliation.
- Owner and property management company knew or should have known about the harassment.
- $110,000 in monetary damages for 7 women and 4 minor children.

FOR IMMEDIATE RELEASE

Wednesday, September 30, 2015

Kanawha County, West Virginia, Property Manager and Owner to Pay $120,000 to Settle Sexual Harassment Lawsuit Filed by Justice Department

United States v. Boston Housing Authority *Filed in 1999, District of Massachusetts*

- **Pervasive and violent harassment of public housing tenants, by tenants and visitors**
  - Racist graffiti
  - Racial slurs
  - Racially motivated violence
  - Intimidation
- **Alleged a systematic failure by the public housing authority to protect tenants**
- **$1 million monetary damages to victims**

A14 L+ THE NEW YORK TIMES NATIONAL TUESDAY, JULY 27, 1999

Boston Settles Lawsuit by Harassed Minority Tenants

By CAREY GOLDBERG

BOSTON, July 26 — Resolving a landmark lawsuit over racial harassment by white tenants in public housing projects, the Boston Housing Authority reached a settlement with minority tenants today that Federal officials said could serve as a model for ending a handful of other such suits around the country.

Under the settlement, the Housing Authority, accused of failing to protect victimized tenants, must adhere to a demanding program in an effort to eliminate racism in its projects — a goal it is already pursuing. It must also pay $1.5 million in damages and legal fees.

The agreement, which requires the approval of a Federal court, would end a case begun in 1996, when 13 black and Hispanic tenants sued over attacks on them and their children after they had moved into mainly white housing projects under a court-ordered desegregation plan. The plaintiffs accused the Housing Authority of failing to investigate and stop the harassers, even though the identities of some were known.

The accord, announced at a news conference here, could show the way to resolving similar suits pending in San Francisco, Los Angeles and other cities, said Bill Lann Lee, the Acting Assistant Attorney General for civil rights at the United States Justice Department, which had

Associated Press

The minority tenants who sued the Boston Housing Authority included Reina Rodriguez, who was joined by her children, David, center, and Jasmine, at the news conference where a settlement was announced yesterday.

- **Money** does not rectify all harms done.
- The **impact** can be far-reaching.

- **Reputation** – prospective tenants won’t want to rent from an owner/property management company that failed to protects its tenants from harassment.
- **Operations Risk** – lawsuits can lead to PHA/HUD sanctions.
- **Asset Management** – resident fear of harassment and/or retaliation can lead to other property management issues.

Tom, who is gay, uses a Housing Choice Voucher to rent an apartment.

After Tom moves in, Tom's landlord learns that Tom is gay and issues him a notice of eviction.

- Tom's landlord can't do this.
- HUD's ***Equal Access Rule*** prohibits landlords who accept HCVs and have a HAP contract from refusing to provide housing (or evicting a tenant) because of a person's actual or perceived sexual orientation, gender identity or marital status.
- The ***Equal Access Rule*** applies to all HUD programs, including the project-based voucher program.

Best Practices:

How can you be proactive about preventing harassment?

- Talk with your staff to identify shortcomings in existing policies and protocols for handling harassment complaints and make improvements.
- Talk to tenants to find out if they are experiencing (or have heard about others who are experiencing) harassment.
- Tell tenants about their fair housing rights and where to report harassment.

Best Practices:

- Post and distribute anti-harassment policies.
- Attend and require your staff to attend fair housing trainings that emphasize preventing harassment on a recurring basis, and provide your staff with the time and resources to attend such training.

A Fair Housing Act complaint can be filed:

- With HUD **online at --** https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint;
- With HUD **by phone:** 800.669.9777; Federal (Relay Service/TTY: 800.877.8339);
- With a **state or local fair housing agency** -- https://www.hud.gov/program_offices/fair_housing_equal_opp/partners/FHAP/ agencies;

In addition to filing a complaint, a person may wish to notify the **Department of Justice, Civil Rights Division,** which has authority for patterns or practices of discrimination: 1-844-380-6178; fairhousing@usdoj.gov; https://www.justice.gov/crt/sexual-harassment-housing-initiative-how-report.

For Equal Access Rule complaints, owners and property managers should:

- Instruct residents to contact their **local HUD office,** which can be found at: https://www.hud.gov/program_offices/field_policy_mgt/localoffices.
- Direct residents to the following **website** for more information: https://www.hud.gov/program_offices/fair_housing_equal_opp/LGBT_Housing_Discrimination
- And/or contact the PHA that issued HCV or PBV.

Questions?

Please email questions to:

HUDQuestions@hud.gov

Fair Housing Act and its Regulations, Equal Access Regulations

- **Fair Housing Act, 42 U.S.C. §§ 3601 – 3619 ("the Act"), 24 C.F.R. parts 100, 103, 180**
- **Quid Pro Quo and Hostile Environment Harassment and Liability for Discriminatory Housing Practices Under the Fair Housing Act, 81 Fed. Reg. 63054 (Sept. 14, 2016), final rule ("Harassment Rule")**
  - Available at https://www.gpo.gov/fdsys/pkg/FR-2016-09-14/pdf/2016-21868.pdf
  - Codified at 24 C.F.R. § 100.600
- **Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity, 77 Fed. Reg. 5662 (Feb. 3, 2012), as amended by Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs, 81 Fed. Reg. 64763 (Sept. 21, 2016), and Equal Access to Housing in HUD's Native American and Native Hawaiian Programs – Regardless of Sexual Orientation or Gender Identity, 81 Fed. Reg. 80989 (Nov. 17, 2016) ("Equal Access Rule")**
  - Available at: https://www.gpo.gov/fdsys/pkg/FR-2012-02-03/pdf/2012-2343.pdf; https://www.gpo.gov/fdsys/pkg/FR-2016-09-21/pdf/2016-22589.pdf; and https://www.gpo.gov/fdsys/pkg/FR-2016-11-17/pdf/2016-27196.pdf
  - Codified at 24 C.F.R. §§ 5.105(a)(2), 5.106

PIH Regulations and Notice

- **PIH Regulations:**
  - 24 C.F.R. § 966 - Public Housing Lease and Grievance Procedure
  - 24 C.F.R. § 982 - Section 8 Tenant Based Assistance: HCV Program
  - 24 C.F.R. § 983 – Project Based Voucher (PBV) Program
- **PIH Notice 2014-20 (HA):**

  Program Eligibility Regardless of Sexual Orientation, Gender Identity, or Marital Status as Required by HUD's Equal Access Rule

  - Available at https://www.hud.gov/sites/documents/PIH2014-20.PDF

Please visit the HUD Exchange website to register for trainings on “Preventing and Addressing Sexual Harassment in Housing” and to view relevant materials.

Share your feedback about this presentation:

Complete the brief post-training survey located in the Activities section of the class page in the HUD learning management system.

Recognizing & Fighting Housing Discrimination

What is housing discrimination?

- Housing discrimination includes blocking someone's access to housing, treating one renter or buyer differently, or denying someone the right to buy or rent a home even though they can afford the property, all because that person is a member of a group the law protects.

Why is it important to understand what housing discrimination is?

- You can recognize when your rights are being violated.
- You know when you should file a complaint.
- You can obtain the housing you need.
- You can help put a stop to unfair housing practices.

Protected Classes Under the Fair Housing Act

- race
- color
- national origin
- religion
- sex
- familial status (the presence of children under 18 in the home)
- disability (physical or mental impairment which substantially limits a major life activity; including, for example, HIV-AIDS)

Rental Discrimination Examples

Because someone is a member of a protected class:

- Lying about availability
- Setting different rental terms for different people
- Failing to respond to inquiries or provide a rental application

Real Estate Sales Discrimination Examples

Because someone is a member of a protected class:

- Lying about or exaggerating sales terms
- Failing to inform buyers about all listings
- Stalling to avoid showing a home
- Steering buyers to certain neighborhoods
- Refusing to negotiate with prospective buyers

Also Discriminatory and Illegal

If done because of protected class status:

- Running a discriminatory ad
- Blockbusting
- Creating/enforcing zoning laws that have a discriminatory effect
- Inducing people into selling or renting their homes by telling them members of a protected class are going to move to their neighborhood
- Intimidating someone so that he or she will not file a housing discrimination complaint

Exemptions

- Some single-family housing rented or sold by an owner
- Some rooms or units within owner-occupied buildings with no more than four units
- Some housing operated by nonprofit religious groups or private clubs that limit occupancy to members
- Some housing for older persons (for example, over-55)

Mortgage Discrimination Examples

Because someone is a member of a protected class:

- Scrutinizing one loan application more closely than another
- Giving an unreasonably low appraisal
- Imposing different loan terms or conditions
- Denying loans in certain neighborhoods ("redlining")

Home Insurance Discrimination Examples

Because someone is a member of a protected class:

- Refusing to respond to a request for an insurance quote
- Refusing to insure homes in certain neighborhoods ("redlining")
- Quoting a higher premium

Non-discriminatory Criteria

- Landlords, sellers and lenders have the right to choose one prospective renter, buyer or borrower over another as long as the decision is based on objective criteria applied equally to everyone provided the criteria do not have a disparate impact on protected classes in violation of the FHA. For example, all other things being equal, it is fair to rent a home to the applicant who demonstrates he or she is able to afford the rent as opposed to someone who is not.

Rights of Disabled Renters & Buyers

- The right to make reasonable modifications and be granted reasonable accommodations in order to get full use and enjoyment of the housing
- Protects disabled buyers and renters, disabled persons residing with someone else, any person associated with a disabled buyer/renter, and any person perceived as disabled

Reasonable Modifications

- Necessary physical changes to the property (covering private living space and/or common areas)
- Made at the expense of the disabled person
- Necessary to afford the disabled person the full use and enjoyment of the property
- Must be reasonable
- Can't be evicted for making request
- Landlord can request renter, when reasonable, to restore interior to original condition when moving out

Reasonable Accommodations

- Exemptions from resident rules, policies, practices or services (covering private living space and/or common areas)
- Necessary to afford the disabled person the full use and enjoyment of the property
- Not reasonable if it imposes an undue financial or administrative burden on the housing provider
- Can't be evicted for making request

Accessibility

- FHA accessibility requirements:
  - apply to the design and construction of covered multifamily housing first occupied after March 13, 1991
  - apply to anyone involved in the design and/or construction of covered multifamily housing, including builders, developers and architects
  - apply to all ground-floor units in buildings without elevators and all units in buildings with elevators

Accessible Design & Construction

- Requires (but not limited to):
  - Accessible entrances and passageways (doorways wide enough for wheelchairs)
  - Accessible common areas
  - Easy-to-reach light switches, thermostats, electrical outlets and other controls
  - Bathroom walls reinforced for grab bars
  - Kitchens and bathrooms with sufficient space so that a wheelchair can be maneuvered within them

Use what you've learned so far today to determine which of the scenarios describes a case of discrimination. Explain exactly what action in the scenario was discriminatory under the Fair Housing Act. Or, point out why an action was *not* discriminatory under the Fair Housing Act.

ACTIVITY: CASE STUDIES

Filing a Discrimination Complaint

- Contact HUD (central or regional office)
- Submit complaint (online, by mail or by phone)
  - Online complaint form (www.hud.gov)
  - Downloadable/printable agency complaint form (mail)
  - Letter (mail)
  - Phone (800-669-9777)
- Provide:
  - your name/address; name/address of the person you are complaining about; address of the housing; how you were discriminated against; and date of the incident
- Within 1 year of when the discrimination occurred or terminated

LIVE FREE…from housing discrimination

The Complaint Investigation Process

- HUD complaints are investigated by HUD's Office of Fair Housing and Equal Opportunity (FHEO).
- Complaints are referred from HUD to a state or local enforcement agency if HUD has certified their laws as equal to or stronger than the FHA.
- Conciliation will be attempted during investigation.
- If there's no conciliation, agency determines if there is "reasonable cause" to believe discrimination took place and, if so, issues a Charge of Discrimination.

LIVE FREE…from housing discrimination

The Legal Process for HUD Charges of Discrimination

- Administrative hearing (within 120 days)
- Any party to the Charge can, within 20 days, instead elect to have the Charge heard in federal court.
- No cost to you for hearing or court case
- Money damages, injunctions and civil penalties available
- Punitive damages available only in court (not administrative hearing)
- You can bring your own civil lawsuit (at your own expense).

LIVE FREE…from housing discrimination

Fair Housing Resources

- Department of Housing and Urban Development (HUD) ***www.hud.gov***
- State and local fair housing agencies
- Private fair housing groups
- Legal aid organizations

LIVE FREE…from housing discrimination

Congratulations!

You've completed the housing discrimination training!

HUD
451 7th Street, S.W.
Washington, DC 20410
www.hud.gov
800-669-9777 (TTY: 800-927-9275)

The Fair Housing Institute, Inc.

Advanced Fair Housing©
Syllabus

Advanced Fair Housing

- Introduction
- Overview
- Disclaimer
- Why this course is necessary

Assistance Animals

- Recognizing an emotional support animal
- Accept or reject: striking a balance
- State and local laws
- ESAs vs. pets
- What types of animals can be ESAs?
- Is this resident disabled
- Encourage residents and verifiers
- Definition of disability
- Questions on ESA forms
- Multiple assistance animals
- Issues and rejecting multiple ESAs
- Assistance animal agreement
- Guest assistance animals
- Online certificates
- ESA letters
- Challenging verification
- Summary

Criminal History Screening and Disparate Impact

- Screening
- Local laws and ordinances
- Arrests vs. convictions
- Fair housing considerations
- Unique situations
- Appealing a denial
- Exceptions to criminal history policy
- Processing an appeal
- Considerations for appeals
- Disparate treatment
- Disparate impact
- Lookback periods
- Content of criminal history policy
- Developing a graduated policy
- Do not summarize your policy
- Third party screening policies
- Summary

VAWA and Domestic Violence

- Domestic violence
- Disturbance example and options
- Crime free ordinances
- State and local laws
- Properties covered
- VAWA rights
- Landlord tenant rights
- Emergency transfers
- Staying informed
- Is this domestic violence?
- Multiple examples
- Summary

Sexual and Other Protected Category Harassment

- Sexual harassment
- Quid pro quo vs. hostile environment
- Processing claims
- Avoiding claims

- Appropriate vs. inappropriate comments
- Multiple examples
- Example review
- Best practices
- Lease violations
- Mitigating negative outcomes
- Sexual harassment scenario
- Scenario response
- Steps involved in resolving an incident
- Management’s response
- Any incident can cause an issue
- Other protected category harassment
- Summary

Expansion of the Definition of Sex

- The definition of sex
- Employees’ personal views
- Examples for training
- Closer look at outcomes
- Harassment
- Sensitivity training
- Summary

Marketing and Advertising

- Marketing and advertising
- The broad definition
- Discriminatory statements
- Multiple examples
- Words to avoid
- Problematic phrases
- Marketing cheat sheet
- Pictures
- Diversity in advertising
- Use of stock photos and models
- Advertising over time
- Social media
- Marketing on digital platforms
- Website and app accessibility

- Legal basis
- ADA website accessibility guidelines
- WCAG technical standards
- Serial-filing
- Summary

Conclusion

- Summary
- Additional resources
- Certification Exam

Fair Housing Advertising Words and Phrases List

There are words and phrases that are entirely acceptable and some that are entirely unacceptable. Sometimes it will depend on how they are used. The general rule is to avoid references to any of the protected categories, or discouraging applicants who have physical or mental limitations. In addition to the federal protected categories, there also may be state and local protected categories that may apply to your property. These are our recommendations for best practices. These lists are not intended and should not be used in place of legal advice. For answers to specific questions, consult an attorney.

ACCEPTABLE ✓

Credit Check Required
Den
Equal Housing Opportunity
Family Room
First Time Buyer
Fixer-Upper
Great for Family
In-Law Apartment
Luxury Townhomes
Nanny Room
Near Mass Transit
Near Golf Course
(Neighborhood Name)
Nice
No Drinking
No Drugs
No Drug Users
No Smoking
Number of Bedrooms
Nursery
Nursing Home
On Bus Route
Private Entrance

Retirees *
Seniors *
Senior Citizens *
Senior Housing *
Grandma's House *
Golden Agers *
Sophisticated
Student Housing
Within Walking Distance of
Master Suite
Walk in Closet
Gated Community
Description of Amenities
Quality Construction
Quiet
Reference Required
(School District)
(School Name)
Security Provided
Play Area
Privacy
Private Driveway
View of ____

Senior Discount
____ Square Feet
Starter Home
Traditional Style
Tranquil Setting
Verifiable Income
Board Approval Required
Close to Downtown or Stadium
Domestic Quarters
Female or Male Roommate
Handyman's Dream
Screened for Income and Credit
Membership Approval Required
Near Country Club
No College Students
Prestigious
Quality Neighborhood
Quiet Neighborhood
Private Setting
With View

UNACCEPTABLE ✕

Able-bodied
Adult Living
Active Adult Community
Adults Only
Agile
Couples only
Safe neighborhood
Criminal Record Not Accepted
Felons Need Not Apply
Empty Nesters
Ethnic References
Exclusive Neighborhood
Racial References
Religious References
Healthy Only
No Gays or Lesbians
Heterosexuals Only
Mature Couple
Mature Individual
Mature Person(s)
Must Be Employed

Reference to Nationality
Near Church(es)
Near Synagogue
Near Temple
Newlyweds
No AIDS
No Alcoholics
Only Christians Need Apply
No Children (unless HOPA*)
No Teenagers (unless HOPA*)
No Play Area
No Unemployed
Not for Handicapped
Older Person
Only One Child
One Person
Physically Fit
Quiet Tenants Only
Singles Only
Single Person
Stable

**HOPA Community - May be used when housing requirements meet the Fair Housing Act criteria for "housing of older persons."*

Michigan Asset Group
December 14, 2020

Fair Housing Annual Update

Liz Keegan, Director of Education & Outreach
Fair Housing Center of West Michigan

Agenda

- Is this a fair housing issue?
- State of Fair Housing, Impact of Covid-19
- Fair Housing Laws Update
- Fair Housing Hot Topics & Best Practices
- Questions & Evaluations

What is Fair Housing?

- Fair housing law is the right of individuals to obtain housing of their choice free from discrimination based on protected classes under federal, state and local fair housing law.

Protected Classes

FEDERAL:
- Race
- Color
- National Origin
- Gender
- Religion
- Disability Status
- Familial Status

MICHIGAN:
-Marital Status
-Age
-Sexual Orientation*
-Gender Identity*

HUD Equal Access Rule:
-Sexual Orientation
-Gender Identity
-Marital Status

NEW Local Ordinances in MI

- CADILLAC: education, gender expression, gender identity, sexual orientation, height, weight
- HOLLAND: education, source of income, sexual orientation, gender expression, gender identity, height, weight (effective 9/9/2020)
- KALAMAZOO: individual's source of income, status as a victim of domestic violence, prior arrests, conviction record

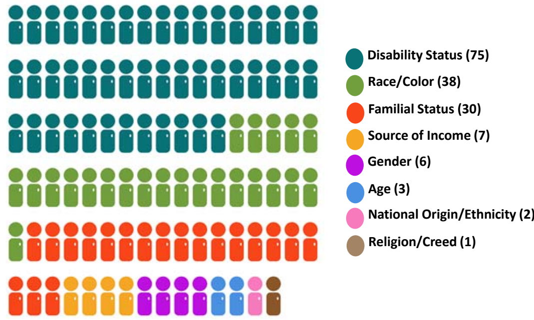
Finding Local Ordinances

Do any of your properties have additional fair housing protections that apply?
- Check with your city, township, village government office
- Check with your local Fair Housing Center
- https://library.municode.com/
- https://codelibrary.amlegal.com/

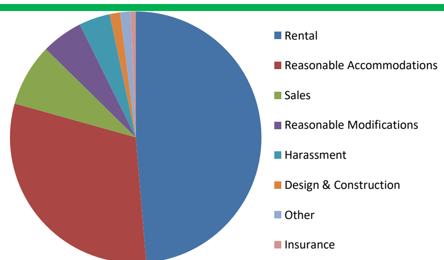
State of Fair Housing

- A conservative national estimate puts the number of violations of fair housing law at 4 million every year.
- POLL 1: What are the top 3 protected classes reporting housing discrimination nationally?

Fair Housing Center Cases 2019



2019 Cases by Transaction Type



Covid-19 Trends & Concerns

- Housing instability for communities of color
- Sexual harassment
- Domestic violence
- National origin discrimination
- Selective treatment based on a protected class, especially as relief programs expire

Covid-19 Trends & Concerns

- Apartment communities, especially those servings seniors or people with disabilities, denying entrance to necessary caregivers.
- Denial or significant delays of reasonable accommodations (rent due dates, assistance animals), modifications (ramps, grab bars) needed because of a disability.
- COVID-19 may be considered a disability under law – keep an eye out for more information on this.

Fair Housing Law Update

Michigan – *proposed* protections:
- Sexual orientation and gender identity
- Status as a victim of domestic violence, sexual assault, or stalking
- Military status: the status of being an active duty member of the Armed Forces of the United States or a veteran who received an honorable or general administrative discharge from active duty with the Armed Forces of the US.
- Source of income (legal and verifiable)

Fair Housing Law Update

Michigan: “Misrepresentation of Emotional Support Animals Act” (House Bills passed in March 2020, in Committee; Senate Bills introduced, in Committee)

- licensing of health care providers, length of treatment, physical office space, patient provider relationship, documentation.
- prohibits compensation solely for ESA evaluation.
- Drafted before new guidance from HUD

Application of the Law

- Difference in treatment is the most important concept to understand when considering fair housing laws.
- Fair housing laws require that each person is treated in an equal way by the institution regardless of race, religion, age, sex, disability status, etc.
- KEY: consistently provide the same quality of treatment to all persons.

Application of the Law

- Do not volunteer inappropriate information about neighborhoods or make comments about any type of person.
- It is often best not to make any statements which may unlawfully pertain to a protected class (i.e. “this is a very diverse area”, “there are/are not many people like you here”, etc.)
- It is best not to answer questions which pertain to a protected class (i.e. about the racial makeup of the community, if there are many men/women within the community, etc.), but rather to direct them to a neutral data source (such as census data) where such information could be obtained.

Application of the Law

- Do not make assumptions about a person’s financial qualifications, rental history, credit worthiness, housing style preferences, neighborhood preferences, etc.
- Be welcoming and encourage everyone to apply.
- If you are not sure how to answer a question or do not have an answer, take the person’s contact information and pass on the request to a staff person so they can follow up.

Application of the Law

- Talk about the housing and its amenities, NOT the people.
- It is best NOT to inquire about a person’s disability or a perceived disability.
- In order to communicate effectively with all persons, be prepared with a list of auxiliary aids and services for persons with vision or hearing impairments or other disabilities.

Resources

Disability Network Michigan
http://www.dnmichigan.org/
Deaf & Hard of Hearing Services
https://deafhhs.org/
Association for Blind & Visually Impaired
www.abvimichigan.org/

Case – Advertising

- Colorado Condo
- 10 out of 12 ads stated subject property was available for a maximum of two people, each over 35 years of age
- "1 or 2 people max, both over 40 years of age, no exception."
- Website described property as "[p]rivate, restricted, adult condominium community."
- Told a 29 year old tester they would 'further discuss renting'
- Told a tester with a 4 year old that the subject property was an older community, that they like to keep the community rules, and she did not think she could bend the rules for her.

Social Media

- Same rules apply - Section 804(c) applies to advertising on web-based platforms.
- Ensure the settings of your advertisements aren't discriminatory.
- Show diversity even when using avatars, animated characters, and illustrations, too.
- Regularly review all posts and comments with a fair housing lens.
- Display the Equal Housing Opportunity logo, share fair housing information.
- Develop social media policy that includes fair housing compliance.

Best Practice

- Do not use words, phrases, photographs, illustrations, or forms that convey that dwellings or programs are available or not available to a particular group of people.
- Do not express to anyone a preference for or limitation because of any protected class.
- Do not select media or locations for advertising which deny particular segments of the market information about housing opportunities.

What information is necessary at what point?

- Applications should collect information relevant to objectively determine whether or not an individual qualifies for an available housing opportunity.
- Ensure that unlawful questions are not asked in person or on the application.
- Distinguish between information necessary to evaluate an individual's eligibility for residency and information more appropriate to ask after an individual has been approved.

Best Practices

- Refer to the list of protected classes that cover the property area.
  - How would an applicant or resident treatment vary by protected class?
  - Is there any adverse treatment or unintentional barriers?
  - Who is left out?
  - Could you defend any findings as nondiscriminatory?

Case – Familial Status

- Montana duplex in downtown neighborhood
- 3 bedroom, 2 bath refused to family of 4
- Owner decided she doesn't want to rent to more than 3 people because of the possibility of noise for basement tenant.
- "The owner was also concerned about your daughters being home alone. Or do you work from home?"
- "She's just looking for maybe two people, a couple maybe with one child, something like that. She's very picky because she's had to put so much money into that place. So she wanted me to let you know that either way she's gonna hold off until she finds something like. She's just concerned about having teenage girls that are going to be alone quite often with that property."
- Offered a mobile home in suburb instead; rented duplex to couple without kids.
- Complainant and her children suffered actual damages including, but not limited to, emotional distress, loss of housing opportunity, inconvenience, and economic loss

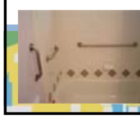
Disability Status Defined

- "Disabled" is a broad term that covers mental as well as physical disabilities.
- "Disability" is defined as :
  - a physical or mental impairment that limits a major life activity;
  - a record of having such an impairment;
  - being regarded as having such an impairment.
- "Major Life Activity" should be broadly construed and include physical, mental, and social activities and working.
  - Sleeping, walking, bathing, eating, breathing, driving, hearing, seeing, etc.

Reasonable Modification

Reasonable modification is a structural or other physical change to the unit or housing structure to provide a person with a disability physical access.

Examples: a ramp to a building's entrance, grab bars in the shower and bathroom.



Reasonable Accommodation

- Reasonable Accommodation is a change in any rule, policy, procedure or service if the changes are needed in order for a person with a disability to have equal access and enjoyment of their housing.
  - Examples: verbally reviewing program overview or other information with someone who is visually impaired, assigning a designated parking spot, permission for an assistance animal.

Maintenance Best Practices

- **Set written policy on responding to maintenance requests and tell residents about it. Document how requests are made and handled**. This is especially important because sometimes what appears to be a routine maintenance request is actually a request for an accommodation or modification.
  - Moving the location of a light fixture or switch; lowering the towel rack in the bathroom, etc.

RAs & Hoarding

- Hoarding is a mental disorder under the Diagnostic and Statistical Manual of Mental Disorders (DSM-5)
- Interactive dialogue is key, individualized plan to retain the resident
- Time is the primary reasonable accommodation
- Planning for and allowing assistance to clean out enough to achieve lease compliance
- Health and safety violations cannot continue indefinitely
- Imminent threats (usually fire, structural or contamination) must be addressed immediately
- FHCs can help with RA requests in rentals

RA to Rental Due Date

- HUD is charging a case in GA
- Man with SSDI worked with 2 management companies successfully to pay rent (23x) on or after the 2nd due to when he receives income
- New management began charging $100 late fees, 3 Notice to Quits/4 Dispossessory Warrants, non-renewal alleging he owed $1,887 despite 2 RA requests over 5 months
- PM claimed no documentation of agreement then denied RA due to his financial condition not his disability

RA Request for Transfer

- Atlanta Housing Authority - Unit flooded 7 times in 5 years, 2 transfer requests; PM didn't respond to second request because they considered it addressed with 1st denial
- Significant asthma forced son to move in with grandma eventually – and stay away from his family for 33 months
- Maintenance removed part of padding, left carpet; PM didn't ever repair padding or remove damaged carpet.
- Doctor refused to fill out the PM's 2 page verification form because it wasn't familiar and Dr. had provided info already about sending the child to a specialist, who also substantiated the request
- Complainants have suffered actual damages, including but not limited to out of pocket costs, emotional distress, inconvenience and loss of a housing opportunity

RA to 'No Pet' Policy

- HUD is charging a case in NY
- Respondent emailed Complainant a "new Service Animal Policy", stated, "I need all of the required information and pet deposit which will be an additional $500."
- The new Service Animal Policy requirements included indemnification of PM, proof of insurance, and certification of training for the animal.
- Complainant was also required to provide intrusive medical information such as a Diagnostic and Statistical Manual of Mental Disorders ("DSM") diagnosis, a detailed description of symptoms, a history of treatments and hospitalizations, a list of medications, anticipated prognosis, and a signed HIPAA authorization for each treating healthcare professional permitting the landlord to contact the treating professional for any additional information or clarification.
- Respondents additionally required that Complainant obtain a vest for dog indicating it was an assistance animal and present said vest to them for approval…

RA to No Pet Policy (cont.)

- Complainant provided signed letter from therapist, dog license, tags, vaccination and medical history as required by policy.
- Lawyer still expected: information regarding her diagnosis, symptoms, treatment and hospitalization history, functional limitations, medications, prognosis, signed HIPAA releases, and proof of the dog's training.
- Complainant concluded that her lease wouldn't be renewed because she wouldn't provide said detail and moved out at the end of her lease.
- Complainant has suffered actual damages including but limited to, emotional distress, loss of housing opportunity, inconvenience, and economic loss

NEW: HUD Guidance on Animals

January 28, 2020

- Replaces prior guidance, FHEO-2013-01 (April 25)
- Two sections
- Does not address Section 504 or ADA
- Should be read together with HUD/Department of Justice (DOJ) Joint Statement on Reasonable Accommodation under the Fair Housing Act
- Apply it going forward; should not reassess requests for reasonable accommodations that were granted prior to the issuance of this guidance in compliance with the FHA

NEW: HUD Guidance on Animals

- There are two types of assistance animals:
  (1) service animals, and
  (2) other trained or untrained animals that do work, perform tasks, provide assistance, and/or provide therapeutic emotional support for individuals with disabilities (referred to in this guidance as a "support animal")

NEW: HUD Guidance on Animals

- Walks housing providers through a series of questions.
- Starts with assessment of whether the animal (dog) is an individually trained service animal.
- Then transitions to support animals.
- Incorporates information that you may already have or known about the disability/need.

Common Household Animals

- Dog, cat, small bird, rabbit, hamster, gerbil, other rodent, fish, turtle, or other small, domesticated animal that is traditionally kept in the home for pleasure rather than for commercial purposes
- Reptiles (other than turtles), barnyard animals, monkeys, kangaroos, and other non-domesticated animals are not considered common household animals
- 'Unique animals' require demonstrating a disability-related therapeutic need for the specific animal or the specific type of animal

V. General Considerations

- No fees, pet rules, limits of breed or size of either support animal or dog for service animals.
- May refuse a RA if the specific animal poses a direct threat that cannot be eliminated or reduced to an acceptable level through actions the individual takes to maintain or control the animal.
- Animal is their responsibility to feed, maintain, care and control.

V. General Considerations

- Must engage in a good-faith dialogue with the requestor called the "interactive process."
- The housing provider may not insist on specific types of evidence if the information which is provided or actually known to the housing provider meets the requirements of this guidance (except as provided above). Disclosure of details about the diagnosis or severity of a disability or medical records or a medical examination cannot be required.
- Must discuss or offer alternative accommodation if original request is denied.

Best Practices

Housing providers:

- May find it helpful to have a consistently maintained list of reasonable accommodation requests
- Are not entitled to know diagnosis
- Are encouraged to direct the requester to the Guidance on Documenting an Individual's Need for Assistance Animals in Housing, P. 16-19
- Should make a determination promptly, generally within 10 days of receiving documentation

Processing Requests

- The approval or denial of requests depends on the circumstances presented and needs to be determined on a case-by-case basis.
- ***Document every step taken.***
- ***It is also important to keep all information confidential.***
- NOTE: Persons with disabilities typically have the most accurate knowledge about the functional limitation posed by their disability.

Resources

- Focus on the Fair Housing Act in managing housing/properties!
- Do your homework!
- Updated and New RA & RM tools:
  - Guidebooks for Housing Providers
  - Guidebooks for Housing Consumers
  - Assistance Animals in Housing Resource Guide…

www.fhcwm.org/publications

Assistance Animal Resource Guide

- Meant for use by anyone regardless if they are a person with a disability making a request, a housing provider processing a request, or an advocate looking for more information.
- Includes:
  - Sample Support Letter
  - Sample Assistance Animal Policy…
- Can help with education/accountability
- Sets forth expectations
- Documents acceptance of assistance animal
- Can be customized with company name
- Recommend signed and copied for all parties

Familial Status Protections

It is unlawful to discriminate against anyone because of their familial status.

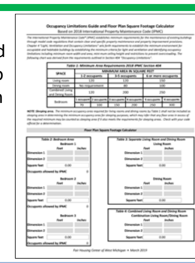
- "Familial status" means one or more individuals (who have not attained the age of 18 years) being domiciled with -
  (1) a parent or another person having legal custody of such individual or individuals; or
  (2) the designee of such parent or other person having such custody, with the written permission of such parent or other person. The protections shall apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years.

Case – Familial Status

- 18 unit property in Georgia with sign: "2 or 3 bedroom apts for rent"
- Mother with 2 children called and heard voicemail recording:
- "Hi. This is Mike Parker of Parker Apartments in Richmond Hill. I have two-and three-bedroom units in the Richmond Heights area. I require a twelve-month lease and don't allow pets. No more than one child is allowed in a two-bedroom or two children in a three-bedroom. Clean-cut, non-smokers are preferred. Leave a message if you want more information. Thank you."
- He also stated in an interview with HUD that he tries to discourage people from having too many children in an apartment.

Occupancy Guidebook

- Designed to assist condominium associations, landlords, property owners and managers, and others in determining how to set occupancy limitations with consideration of fair housing laws
- Step-by-step guide for determining occupancy limits based on local restrictions
- Only local units of gov. in Kent County (Michigan)
- www.fhcwm.org/occupancy



Maintenance Best Practices

- **Treat all residents the same way**. Resist the urge to provide preferential treatment to some residents as those who don't get that type of treatment may feel that they're being discriminated against.
- Equal treatment includes equal enjoyment of the home, including access to services.
- Taking requests out of order could be construed as preferential treatment = risk.

Maintenance Best Practices

- **Treat all residents the same way**.
- Can't I help an older resident struggling with her groceries?
- As long as you help <u>all</u> older residents struggling with their groceries. Focus on the circumstances and not the person.
- Did they ask? Is it appropriate? Is it in your policy – perhaps under customer service?

Maintenance Best Practices

- **If the resident is home, don't enter the apartment unless they let you in.** When you make a service call, you should knock loudly and call out to let the resident know that you are there. If there's no answer, you should open the door and call out again from the door. You shouldn't enter the apartment until the resident lets you in or you are certain that no one is home.
- If the resident isn't home when you do your work, leave a note saying that you were there, what work you did, and what time you left.

Maintenance Best Practices

- **Don't allow yourself to be in a compromising position**. Sometimes a circumstance that seems appropriate isn't, or the circumstances change after you enter. It's important to recognize this and know when to leave a situation.
  - **EXAMPLE**: A resident comes to the door inappropriately dressed and invites you in. Even though they have invited you in, it's improper to go inside. You should decline the invitation and offer to come back at a more appropriate time. If you are already inside, you should leave and immediately inform management and follow up in writing.
    - Same for intoxication
    - Document, document, document!
- Liz in 5A offered me $100 to buy a grab bar and install in her bathroom on Saturday and I'm not working. That's ok, right?
- All work must be on the clock, liability issues - must decline; refer to office/staff for correct modification process.

Maintenance Best Practices

- **Process maintenance requests in the order they are received except in the event of emergencies**. This way you can show that you didn't pass over earlier requests for a discriminatory reason.
- **Communicate with residents throughout the process**.
  - Delays in orders for needed equipment, when to expect delivery or installation, etc.

Best Practices

- **Keep records of all complaints and any statements that you receive from residents, others in your department, witnesses, etc. as well as research conducted and actions taken.** This way you can demonstrate what may have happened if ever challenged.
- **Keep all records for at least 3 years.**
  - Delays in orders for needed equipment, when to expect delivery or installation, etc.

Best Practices

- **Assure that the property and its amenities are fully accessible for individuals with disabilities.** See www.fairhousingfirst.org for more information.

Questions?

Fair Housing Center of West Michigan

20 Hall Street SE, Grand Rapids, MI 49507

616-451-2980

www.fhcwm.org

MICHIGAN ASSET GROUP, LLC

October 17, 2024

Re: Grand Vista Place
Section 8 - Affirmative Fair Housing Marketing Plan

Michigan Asset Group, as a managing agent, hereby certifies to comply with the following requirements of the Affirmative Fair Housing Marketing Plan:

1. A continuous outreach program will be conducted to maintain a well-balanced waiting list that will always assure the meeting of the affirmative marketing goal.

2. Housing discrimination disclaimer clause shall be included in all preliminary and/or full blank applications.

3. Not to discriminate against applicants based on their race, sex, age, religion, national origin, familial status, or disability.

4. The accessibility logo will be in all advertisements, if the development has barrier free or accessible units.

5. The MSHDA approved equal opportunity housing slogan or logo will be included in all advertising.

6. A log of community contracts, daily traffic records, and any other record-keeping materials are maintained for inspection and a copy of the Affirmative Fair Housing Marketing Plan will be kept on site.

7. All fair housing required signs will be posted in designated locations.

8. Any prospective residential preferences will be identified and made known.

CERTIFIED:

Evert Kramer

MICHIGAN ASSET GROUP
By: Evert Kramer
President