Reasonable Accommodations for People with Disabilities

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US Department of Housing & Urban Development,
Office of Fair Housing and Equal Opportunity
Agenda

- Process - what happens when housing discrimination complaint is filed
- Overview of fair housing laws
- Reasonable Accommodation on basis of disability
- Assistance animals as a reasonable accommodation
- Reasonable Modification on basis of disability
- Section 504 Programmatic requirements
- New construction accessibility requirements
- Olmstead & Affirmatively Furthering Fair Housing Choice
HUD FHEO: Branches

- **Intake** receives housing discrimination complaints from persons who allege that they have been denied a housing right based upon membership in a protected class.

- **Enforcement** investigates and conciliates complaints

- **Programs compliance** conducts compliance reviews of federal fund recipients
HUD FHEO Process

- HUD will notify the housing provider of the filing of the complaint, and allow for a reasonable period to submit a letter of defense.

- HUD is a neutral fact-finder until such time as there is sufficient evidence to allow a determination on the merits.
Investigation

- HUD will interview complainant, respondents, witnesses identified by parties and neutral witnesses;

- HUD may review or request copies of documents establishing policy & practices of housing provider;

- HUD may use other forms of evidence, e.g., statistical data from US Census or other sources in evaluation of complaint and housing provider’s defenses;
Investigation/Conciliation

- Private fair housing agencies may conduct “tests” or “audits” of housing providers, the results of which may provide basis for the filing of a complaint or serve as evidence to a complaint filed by an individual.

- HUD will make good faith efforts from time of filing and until a final determination of merits to resolve the issues – conciliation process.
After Investigation

- If conciliation is unsuccessful, HUD will issue a determination indicating whether there is sufficient evidence supporting allegations of a discriminatory housing practice, or not.

- There is no formal right of appeal to the HUD administrative complaint process.

- Complainants may simultaneously exercise their fair housing rights through private litigation.
After Investigation

• If conciliation fails and HUD determines after investigation that there is sufficient evidence of a violation:

• Office of Counsel may issue a charge – initiates litigation

• ALJ or U.S. District Court upon election
ALJ may award actual damages and assess a maximum civil penalty:

- $16,000 for a first violation
- $42,500 for a second violation in 5 years
- $70,000 for two or more violations in 7 years

Judicial – compensatory and punitive damages
Attorneys’ fees to prevailing party
3 Key Laws Relating to Disability Discrimination

- **Fair Housing Act** - Applies to almost all housing

- **Section 504 of the 1973 Rehabilitation Act**
  - Applies to federally funded housing
  - Does not apply to private housing or housing providers who accept Section 8 vouchers

- **Americans with Disabilities Act (ADA)**
  - Title II applies to state or local government housing
  - Title III applies to commercial facilities and public accommodations (Rental offices, childcare centers, community rooms)
Federal Fair Housing Act

Title VIII of the Civil Rights Act of 1968
(24 CFR Part 100, 42 USC § 3601 -3620)

- Prohibits Discrimination in the sale, rental and financing of housing based on:
  - Race
  - Color
  - Religion
  - Sex (Gender)
  - National Origin
FHA Amended in 1988

To include:

- **Disability**
  - Physical and Mental Disability

- **Familial Status**
  - Presence of minor children in the residence of a custodial adult
    Includes pregnant women & foster and grandparents

- Provided for Administrative enforcement by HUD and right to private suit
Fair Housing Act

- Applies to virtually all housing providers, both public and private

- Prohibited Activities include (non-exhaustive list):
  - Refusing to sell, rent, deal
  - Differential terms & conditions of tenancy
  - Discriminatory statements
  - False representation of availability
  - Discrimination in terms of mortgage lending
  - Discrimination in terms of property insurance
Provisions for people with disabilities:
  - Reasonable accommodation
  - Reasonable modification
  - Physical accessibility in multifamily new construction of 4 or more units built post 3/13/91
  - In subsidized properties, accessibility standards of FHA and 504 will simultaneously apply
Section 504

- Section 504 of the Rehabilitation Act of 1973
- Applies to federally-funded housing
- Prohibits discrimination based on disability in any HUD-funded program or activity
- Requires physical and program accessibility
Americans with Disabilities Act of 1990

- **Title II**: Prohibits discrimination on basis of disability in state and local government services (28 CFR Part 35)
  
  (HUD enforces in programs receiving HUD funding)

- **Title III**: Prohibits discrimination on basis of disability in public accommodations
  
  (HUD enforcement limited to public-use areas of HUD-subsidized housing. Otherwise enforced by DOJ)
Title II of ADA

- Prohibitions on basis of disability very similar to those of Section 504: covers housing, programs & services

- As with 504, prohibits methods of administration that have effect of discrimination (24 CFR 25.130)

- As with 504, imposes programmatic requirements

- Physical accessibility requirements apply only to common-use areas of residential housing (e.g., rental office, parking lot, common grounds). Accessibility standard: ADAAG or UFAS
California Fair Employment & Housing Act

- California FEHA is administratively enforced by the California Department of Fair Employment & Housing (DFEH)
- HUD has work-sharing agreement with DFEH to assist it in enforcement of fair housing rights
- Administrative process & protected classes similar to Federal Fair Housing Act, except adding these four additional protected classes:
  - Source of income
  - Sexual orientation/gender identity (LGBT)
  - Marital status
  - Source of income
Who is Person with a Disability?

- Individual with handicap (disability) defined:
  - Physical or mental impairment that substantially* limits 1 or more life activities, or
  - has a history of impairment, or
  - is regarded as having impairment

24 CFR 8.3, 24 CFR 100.201

*Note: CA State law does not require “substantial”
Illness Does Not Equal Disability

A medical diagnosis (e.g., cancer)

≠

is not the same as a disability (e.g., mobility limitation).

Not all people with a diagnosis for an illness or a medical condition are impaired by that, though they may sometimes be regarded as such and become entitled to protection under fair housing laws.
Impairment of Life Activity

- **Physical:**
  - Caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, many others

- **Mental:**
  - Caring for one’s self, learning, working, interacting with others, remembering, many others

- **Developmental:**
  - Ability to learn with onset before age of 18

May not offer protected housing rights to current users of unlawful drugs or abusers of alcohol who constitute a “direct threat” to others or property. (24 CFR 8.3)
Record of Impairment

• Record of impairment:
  o Actual history of impairment
  o Misclassified as having impairment

• Regarded as impaired:
  o No substantial impairment, but is treated or regarded by others as being impaired

(24 CFR 8.3)
Americans with Disabilities

- **50 Million** persons, age 5 and older, in the United States are identified as persons with disabilities
- **34 million** Americans are age 65 or over
- **5.5 million** are 85 & older, up from 3.3 million in 2000 (almost double)
- At some time in their lives **70%** of all Americans will have a temporary or permanent disability that makes climbing stairs impossible
## Bases for 36,695 Complaints, Fiscal Years 2010 – 2013

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<thead>
<tr>
<th>Base</th>
<th>Count</th>
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<tr>
<td>Disability</td>
<td>18,145</td>
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<td>Race</td>
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<td>Color</td>
<td>729</td>
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<tr>
<td>Retaliation</td>
<td>3,461</td>
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Source: HUD Annual Report on Fair Housing, FY 2012 - 2013
Issues for Disability Complaints Fiscal Years 2010 - 2013

- Failure to grant a Reasonable Accommodation: 57%
- Non-compliance with design and construction: 3%
- Failure to permit a Reasonable Modification: 4%
- Other: 36%

Source: HUD Annual Report on Fair Housing, FY 2012 - 2013
What is Reasonable Accommodation?

- Change to a rule, policy, practice, service or procedure when such accommodations are necessary to afford a disabled person equal opportunity to use or enjoy the dwelling or program
- Applies to applicants and participants
- Required by FHA, Section 504, ADA

How to Evaluate a Request: DANCE

- D = disabled
- A
- N
- C
- E
Inquiring about Disability

- Strictly limit documentation to that which establishes existence of impairment, and nexus
- Do not ask for medical history or specific diagnosis
- Documentation requirement may be waived where impairment is obvious
- Doctor or any health care professional with knowledge of person’s disability can certify disability
- Safeguard all medical documentation by restricting access only to those with a strict need to know.
How to Evaluate a Request: DANCE

- **D** = disabled
- **A** = asked for accommodation (orally or in writing)
- **N**
- **C**
- **E**
Nexus

- D = disabled
- A = asked
- N = nexus (connection) between accommodation sought and disability
- C
- E
Fundamental Change

- D = disabled
- A = asked
- N = nexus
- C = change to fundamental nature of program or activity
- E
Excessive Burden

- D = disabled
- A = asked
- N = nexus
- C = change
- E = excessive administrative and financial burden
Interactive Process

- Primary consideration is given to the RA request as made by the person with disability

- If request poses excessive burden, engage in an interactive process to determine if an alternative, less-burdensome accommodation would offer equally effective, if not identical, results
Examples of Reasonable Accommodation

All examples are fact-dependent:

- Request to relocate to ground floor or accessible unit
- Request for voucher extension to locate suitable rental unit
- Request to waive credit criteria when credit delinquencies related to disability
Examples of Reasonable Accommodation

- Advance notice of painting to a tenant with multiple chemical sensitivity
- Creating a reserved parking space for a tenant with a mobility impairment who needs to park close to the dwelling unit
- Waiving a parking fee for a disabled tenant’s personal care provider
- Assisting an applicant with a developmental disability in completing a standard rental application
Assistance Animals

• Assistance Animals Under the Fair Housing Act, Section 504 and the ADA
Assistance Animals

- Provide support, assistance or service
- Include emotional support or therapy animals
- **Not** just dogs – examples: cat, bird, guinea pig, miniature horse, capuchin monkey, etc.
- May be trained or untrained
Assistance Animal Must be Permitted if ...

- Individual has disability, as defined in Fair Housing Act/Section 504

- There is a relationship between disability and assistance provided by the animal
What Conditions be Imposed?

- Individual is responsible for maintaining and controlling animal

- Access cannot be denied to housing and indoor and outdoor public and common use areas associated with housing, and

- No breed, weight, or size limitations may be imposed
Bases for Denial or Exclusion

- Specific animal poses a direct threat to health or safety of others or would result in substantial physical damage to property (individualized assessment based on recent credible, objective evidence relating to specific animal’s actual conduct – not speculation about type or breed of animal)

- Undue Financial and Administrative Burden (very high standard to meet)

- Fundamental Alteration (very high standard)
“SERVICE ANIMALS” UNDER THE ADA
Americans with Disabilities Act Title II

- Title II Prohibits discrimination on basis of disability in state and local government services
- Public entities that provide housing; e.g. public housing agencies and state and local government housing, housing provided at state universities and other places of education.
  - (HUD enforces in programs receiving HUD funding)
- (28 CFR Part 35)
Americans with Disabilities Act Title III

- Title III Prohibits discrimination on basis of disability in public accommodations
- Rental offices
- Shelters
- Assisted living facilities
- Housing at places of education.
- (HUD enforcement limited to public-use areas of HUD-subsidized housing.)
DOJ’s revised ADA regulations define “service animal” narrowly as any **dog** that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. (Also **miniature horses** where reasonable.)

The provision of emotional support, well-being, comfort, or companionship do not constitute work under this definition.
The ADA has different requirements from the Fair Housing Act.

Only **two inquiries** may be made by covered entity under the ADA:

1. “Is this a service animal that is required because of a disability?”
2. “What work or tasks has the animal been trained to perform?”

Covered entity **may not:**

- Ask about the “nature or extent of a person’s disability”
- Require documentation or proof.
- Ask above questions if it is “readily apparent that the animal is trained to do work or perform tasks for a person with a disability” (e.g., a guide dog for a person who is blind or has low vision)
The animal is out of control and its handler does not take effective action to control it;

The animal is not housebroken (i.e., trained so that, absent illness or accident, the animal controls its waste elimination);

The animal poses a direct threat to the health or safety of others that cannot be eliminated or reduced to an acceptable level by a reasonable accommodation to other policies, practices, and procedures.
Where Multiple Civil Rights Laws Apply

- Some entities are subject to the ADA, the FHA and Section 504 (federally-funded properties)

- First apply the ADA standard; for assistance animals outside of the ADA’s definition of service animal, then apply the more expansive assistance animal standard under the FHA or Section 504
How to Analyze a Request if Multiple Authorities Apply

- ADA Title II:
  - Does the person have a disability?
  - Is the animal a dog (or miniature horse) that meets the definition of “service animal” under the ADA?
  - Two permitted questions

- If not a “service animal” under the ADA, evaluate under the Fair Housing Act, and 504 if applicable
If Section 504 Applies

- Federal fund recipients have an affirmative obligation to:
  - Permit qualified individuals with disabilities to participate in and benefit from the housing or service;
  - Administer programs using criteria and methods which result in equal participation of individuals with disabilities;
  - Use reasonable accommodation DANCE analysis

- If not a recipient, evaluate the request under the Fair Housing Act
Fair Housing Act

- Was a reasonable accommodation requested?
  - No magic words are required

- If a request was made, use reasonable accommodation “DANCE” analysis
Case analysis - ADA

- Service animal denied entry:
  - The Complainant has a disability as defined under the ADA
  - The service animal is a dog individually trained to do work or perform tasks for the Complainant
  - The Respondent refused to permit Complainant’s service animal to enter the premises
Case Analysis – ADA
Overly Broad Inquiry – Need Apparent

- Complainant has a disability and the service animal is a dog that is individually trained to do work or perform tasks for the Complainant;
- The Complainant’s disability and the work/tasks performed by the dog are apparent;
- Respondent questioned Complainant regarding the need for the animal or required Complainant to produce documentation of disability or the service animal’s training.
• Complainant has a disability and the service animal is a dog that is individually trained to do work or perform tasks for the Complainant;

• The Complainant’s disability and the work/tasks performed by the dog are NOT apparent;

• Respondent questioned Complainant beyond the scope of the two permissible inquiries
Case Analysis – 504/Fair Housing Act

- Reasonable Accommodation request denied/delayed
  - Complainant has a disability as defined under 504/the Act
  - Complainant requested an accommodation (or under 504, Respondent knew of the need for an accommodation)
  - Requested accommodation is necessary because of Complainant’s disability
  - The accommodation was denied, or delayed such as to amount to a denial
Possible Defenses

- **ADA:**
  - Animal is out of control and its handler does not take effective action to control it
  - The animal is not housebroken
  - The animal poses a direct threat to the health or safety of others that cannot be reduced to acceptable level or eliminated by a reasonable modification to other polices, practices, proc.

- **Fair Housing Act/Section 504**
  - Undue financial and administrative burden
  - Fundamental alteration
  - Specific animal poses a direct threat that cannot be reduced to acceptable level or eliminated by a reasonable accommodation
Reasonable Modification

- Reasonable modification is a request to alter the physical structure of a dwelling where necessary for a person with a physical disability to be able to have equal use and enjoyment of it.

- Section 504 does not differentiate between accommodations and modifications.

- FHAA & CA FEHA differentiate.
Private, unsubsidized housing:

- Tenant pays for construction
- Tenant obtains permit(s), guarantees construction will be accomplished in workmanlike manner
- Tenant may be required to restore interior especially if reducing marketability
- Interest-bearing escrow account to guarantee restoration of interior (24 CFR 100.203)
Subsidized Housing:

- Housing provider pays unless doing so would pose undue financial burden
- Requirement may vary for properties that fully meet 5% accessible unit requirement under 24 CFR 8.20, et seq., but even UFAS-compliant units may need unique modifications
Administrative and Financial Burden

- Burden must be **actual** and **demonstrable**, not speculative (estimate, evaluate escrow account, etc.)
- Consider scope of program, resources available
- Do **not** consider future requests as a defense. Each request should be evaluated independently using the D-A-N-C-E paradigm. Denials on basis of undue financial burden may be raised only when funds actually become insufficient to permit granting this specific request.
Reasonable Modifications Examples

- Installing grab bars, ramp
- Installing front-loading washer/dryer
- Installing automatic shut off faucet for people with cognitive disabilities
- Providing visual alarm for hearing impaired persons
- Providing auditory alarm for visually impaired persons
Reasonable Modifications Examples

- Wrapping pipes under sinks with insulation
- Providing Braille numbers on front door
- Installing pictures or color coded signs for people with cognitive disabilities
- Removing protruding objects from pathways
- Disconnecting stove or installing microwave for people unable to safely operate stove
- Widening doors
- Lowering kitchen counters
Section 504

“No qualified individual with handicaps shall, solely on the basis of disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination, under any program or activity that receives Federal financial assistance from (HUD)”

- Specifically prohibit methods of administration which have the effect of discrimination, even where unintentional (24 CFR 8.4)
- Any HUD funding to program may mean entire program area is covered by 504
Section 504

- Prohibits discrimination based upon physical, mental or developmental disability
- Applies only to recipients of federal funds
- First law that required reasonable accommodations
- Established accessibility standards (UFAS) for new construction built after 7/11/88
Section 504 Programmatic Requirements

- Effective communications (24 CFR 8.6)
- Section 504 Coordinator (24 CFR 8.53)
- Public notice of non-discrimination on basis of disability (24 CFR 8.54)
- Disability grievance policy (24 CFR 8.53)
- Self-evaluation, needs assessment & transition plan to address physical/program accessibility (24 CFR 8.51)
- Section 504 is administratively enforced by HUD (no right of private suit)
Applicability:
- Multifamily projects of 4/+ units newly occupied on or after March 13, 1991
- Elevator building: all units on floors served by elevator
- Non-elevator building: all ground floor units

Safe harbor construction standards:
- Fair Housing Act Design Manual

Federally-subsidized buildings generally must simultaneously comply with both FHA & 504 accessibility requirements
7 accessibility requirements:

1. Accessible building entrance on accessible route
2. Accessible/usable public & common use areas
3. Usable doors
4. Accessible route into/through covered units
5. Accessible environmental controls
6. Reinforcements in bathroom walls to allow for subsequent installation of grab bars
7. Usable kitchens & bathrooms

(see 24 CFR 100.205 & Fair Housing Act Design manual for further details)
Section 504: New Construction Accessibility

- Multifamily projects of 5/+ units (first occupancy on/after July 11, 1988; or substantial rehabilitation)
- Minimum of 5%* units accessible to persons with mobility impairments (not fewer than 1)
- Minimum of 2%* units accessible to persons with hearing or vision impairments (not fewer than 1)
- Should include similar range of sites and bedroom sizes and amenities as other units of program.

*HUD may require higher percentage if demonstrated need. (24 CFR 8.22, 8.25, 8.26, 8.27)
504: Tenanting Accessible Units

- Collect need for accessible units from applicants & tenants & continuous analysis of need
- Maintain accurate, updated list of accessible units;
- Vacancies of accessible units should be offered:
  1. to current tenants with need who’ve requested transfer to accessible unit (maintain transfer waiting list);
  2. to applicants with need who’ve requested housing in accessible unit;
  3. to non-disabled residents or applicants who sign agreement to transfer (at housing provider’s expense) when accessible unit is required by another resident or applicant with disability-related need for features

(24 CFR 8.27)
Section 504: Tenanting Section 8 Units

Section 8 Voucher & Project-Based programs:

- Collect need for accessible units from applicants & tenants & continuous analysis of need
- Solicit participation by landlords offering accessible units
- Identify accessible units on Section 8 Referral List and “otherwise assist family to locate an accessible unit” (i.e., extension of voucher period; approve request for exception rent under 24 CFR Section 982.504(b)(2))

(24 CFR 8.28)
Your occupancy policy allows for pets weighing less than 25 pounds.

Bob Marley acquires a 45-pound Pit Bull Terrier named Wailer, which you learn about from your maintenance person, who entered Mr. Marley’s unit to make repairs.

You issue Mr. Marley a lease violation notice. He responds claiming Wailer is a service animal needed for his disability, of which you had no prior knowledge.

Do you need to grant Mr. Marley a R/A to harbor his 45-pound dog Wailer as a service animal?

Can you tell Marley he can have a dog, but not a Pit Bull Terrier breed?

What, if any, documentation, can you ask Mr. Marley to provide regarding his disability? His need for dog? Special training for the dog?

Can you require Mr. Marley to pay an extra deposit for the animal?
Within a few weeks of your approval of Wailer as Mr. Marley’s service animal, you start receiving complaints from neighbors that the dog is left alone and barking for long hours, disturbing neighbors. Your maintenance person observes Wailer relieving himself in the landscaping.

- Can you issue Mr. Marley a lease violation notice for the barking/disturbances?
- Who is responsible for cleaning up Wailer’s waste: Mr. Marley or your maintenance staff?
Skills-building Exercise

• A 2nd floor unit becomes vacant, and you offer it to the next applicant on your waiting list, Bruce Springsteen, aged 86 years. When Mr. Springsteen comes into the office to fill out his application /admissions paperwork, you observe that he is very dependent upon a walker, and he mentions that he sometimes uses a wheelchair.

• If you’re concerned about Mr. Springsteen’s ability to live in the 2nd floor unit, what questions can you ask about his disability?
• Can you tell Mr. Springsteen that you’re going to hold off renting a unit to him until a ground-floor unit becomes available, because you’re concerned about him in an emergency?
Skills-building Exercise

- Six months after he moves in, Mr. Springsteen’s mobility now requires full-time use of a wheelchair. Springsteen asks that you modify his kitchen counter heights and install a roll-in shower so that he can access both in his wheelchair.

- **Who has to pay for renovations: Mr. Springsteen or Housing Provider?**

- **What, if anything, could you offer Mr. Springsteen as an alternative to the renovations?**

- **Can you tell Mr. Springsteen that you’ve had enough of his special requests, and that if he’s not able to live independently, he needs to move from your complex into an assisted living facility?**

Individuals with disabilities have a right to live in the community rather than in institutions if:

- Treatment professionals determined community placement is appropriate, and
- Transfer from institutional care to less restrictive setting is not opposed by the affected individual, and
- The placement can be reasonable accommodated taking in account the resources available

DOJ + HUD: “integration mandate”
HUD issued final AFFH Guidelines July 16, 2015

- Goal of AFFH initiative is to promote a wide range of housing choices, and to avoid perpetuation of historic segregation on bases of race, ethnicity, other protected classes, including disability

- Communities that receive CDBG/HOME funds, and public housing authorities must prepare an Assessment of Fair Housing (AFH) to identify contributing factors that limit choice of housing

- Balanced approach (place-based vs mobility strategies)
Internet Resources

- [http://www.fairhousingfirst.org](http://www.fairhousingfirst.org)
  - Safe Harbors for compliance with the FHA
  - Common Violations
  - Coverage (addresses bldgs. constructed prior to Mar 13, 1991)
  - Seven FHA Design & Constructions Requirements
  - Code, Design, Disability, Government, Legal, Trade, Other website links
Internet Resources

- CA Dept. of Fair Employment and Housing (DFEH)  
  http://www.dfeh.ca.gov

- HUD’s Fair Housing Laws  
  http://www.hud.gov/offices/fheo/FHLaws/index.cfm

- HUD’s Section 504 – Rehabilitation Act 1974  
  http://www.hud.gov/offices/fheo/disabilities/sect504docs.cfm
Internet Resources

- American with Disabilities Act
  http://www.usdoj.gov/crt/ada
- Uniform Federal Accessibility Standards
  http://www.access-board.gov/ufas/ufas-html/ufas.htm
- FHEO Notice 2013-01, *Service Animals and Assistance Animals for People with Disabilities in Housing and HUD-Funded Programs*,
Internet Resources

- DOJ ADA Technical Assistance on Service Animals
  http://www.ada.gov/service_animals_2010.htm
- Reasonable Accommodations under the FHA – HUD & DOJ memo
- Reasonable Modifications under the FHA – HUD & DOJ memo
  http://www.hud.gov/offices/fheo/disabilities/reasonable_modifications_mar08.pdf
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