CIVIL RIGHTS AND FAIR HOUSING COMPLIANCE POLICY

OVERVIEW

The Puerto Rico Housing Finance Authority (Hereinafter "PRHFA") was created as a subsidiary corporation of the Government Development Bank (Hereinafter "GDB") and as an independent government entity of the Commonwealth of Puerto Rico pursuant to Resolution No. 4023 of November 16, 1977, as amended (Hereinafter "Resolution 4023") and Act No. 103 of August 11, 2001, as amended (Hereinafter "Law 103-2001"). The Law 103-2001 renamed the Puerto Rico Housing Financing Corporation to Puerto Rico Housing Finance Authority (PRHFA) and transferred all the powers, rights, obligations, functions and assets of the Housing Bank of Puerto Rico to the PRHFA.

The purpose of the PRHFA is to promote the development of social interest housing and provide financing facilities, subsidies and incentives so that people can acquire or rent a decent home.

The PRFHA promotes the accessibility to decent, safe, and sanitary housing under the regulations promulgated by the United States Department of Housing and Urban Development ("HUD"), and the PRHFA's Organic Act 103-2001, as amended, and other applicable federal or local laws, rules, regulations and ordinances.

PRHFA is committed to ensuring that its programs, policies and procedures do not discriminate against individuals based on race, color, sex, religion, national origin, familial status or disabilities.

PRHFA establishes its Civil Rights and Fair Housing Compliance Policy pursuant to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title II of the Americans with Disabilities Act and *Olmstead v. L.C.* 527 US 581 (1999). PRHFA will post a copy of this policy in the Central Administrative Offices located in San Juan and will provide a copy to employees, contractors, sub-contractors, project owners and management agents of the projects under PRHFA's multifamily programs and request that they post a copy in a visible place. In addition, individuals may obtain a copy of this policy upon request to the PRHFA's Fair Housing Coordinators (Section 504 Coordinator and ADA Coordinator).

II. Definitions

- 1) Disability and the equivalent handicap term means, with respect to a person: (a) a physical or mental impairment that substantially limits one or more of such person's major life activities; (b) a record of having such disability, or (c) deemed to have such disability, but such a term does not include the actual or unlawful use of a controlled substance (as defined in section 802 of Title 21) CFR §100.204). The disabling conditions listed in 24 CFR 100.201 are illustrative and not exhaustive.
- Disabled person- Any person who has (a) a physical or mental impairment that substantially limits one or more of such person's major life activities; (b) a record of having such an impairment, or (c) being regarded as having such impairment (42 USC §3602 (h)). The protections afforded to disabled persons shall be extended to the tenants and/or heads of household, persons residing or intending to reside with a tenant and/or head of household, as well as any other person associated with said tenant, resident or head of household. (42 U.S.C. §3604 (f) (1-2)).



- 3) Disparate Impact and the equivalent term discriminatory effect: A practice has a discriminatory effect when it intentionally or predictably results in a disparate impact on a group of people or creates, increases, reinforces or perpetuates segregated housing patterns because of race, color, religion, sex, disability, familial status or national origin (24 CFR §100.500).
- 4) Hybrid Request or Complaint any request or complaint related to an intrinsic program issue <u>and</u> submitted by a resident, tenant, or participant with disabilities <u>and /or</u> based on an allegation of discrimination submitted by a person of a protected class (race, color, religion, national origin, sex, disability, and/or familial status) under any of the PRHFA's housing programs, that shall be received and evaluated in conjunction by the officers of the applicable housing program and the PRHFA's Fair Housing Coordinator (ADA Coordinator and Section 504 Coordinator, as applicable).
- 5) Programmatic Request or Complaint any request, or any complaint regarding an intrinsic program issue submitted by a resident, tenant, applicant or participant under any of the PRHFA's housing programs that shall be received and evaluated by the officers of the applicable housing program under which the request or complaint was received.
- 6) Protected Class Request or Complaint any discrimination complaint submitted based on any allegation of a protected class (race, color, religion, national origin, sex, disability, and/or familial status) that shall be received and evaluated by the PRHFA's Fair Housing Coordinator (ADA Coordinator and Section 504 Coordinator, whenever applicable).
- 7) Reasonable accommodation is a change, modification, alteration or adaptation in a policy, rule, procedure, practice, program or facility that may be necessary to provide a qualified person with a disability equal opportunity to use and enjoy a dwelling or participate or benefit from a program (42 USC §3604 (f)(3)(B)).
- 8) Reasonable modifications- Modifications of existing premises occupied or to be occupied that may be necessary to afford the individual full enjoyment of the premises, except that, in the case of a rental, the lessor may, when it is reasonable to do so, condition the permit for a modification on the renter agreeing to reinstate the interior of the premises to the condition that existed before the modification, reasonable use of wear and tear excepted. (42 USC §3604 (f) (1-2)).

III. LEGAL AUTHORITY

1) Federal Legislation:

United States Housing Act of 1937, as amended, establishes four major responsibilities:

- Develop policy, regulations, handbooks, notices and guidance to implement housing legislation;
- Allocate housing assistance funds;
- Provide technical assistance and training;
- Monitor compliance with program requirements and performance goals

A. Fair Housing Act

The Fair Housing Act (Title VIII of the Civil Rights Act of 1968), as amended, applies to all housing sold or rented in the United States. As such owners/agents are required to comply with the federal Fair Housing Act, which prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal guardians, pregnant women, and people seeking custody of children under the age of 18), and handicap (disability).



The Act also establishes requirements for the design and construction of covered multifamily dwellings built for first occupancy after March 13, 1991 to ensure a minimum level of accessibility for persons with disabilities. Covered multifamily dwellings are buildings having four or more dwelling units, whether the buildings are privately owned or federally/publicly assisted. In addition, covered multifamily dwellings include single family dwelling units when located in a building of four or more units.

All entities that are operating multifamily housing projects administered by the Multi-Family Housing programs and all housing providers applying for HUD mortgage insurance, not just those providers that qualify as recipients of federal financial assistance, are required to comply with the Fair Housing Act. However, entities of subsidized multifamily housing projects must comply with additional requirements, which do not apply to unsubsidized projects. Therefore, entities of subsidized projects must also refer to HUD Handbook 4350.3, REV-1 for detailed guidance. The Handbook also provides useful information for entities of unsubsidized projects with respect to the Fair Housing Act's requirements, as well as Title VI, Section 504 and the ADA which are described in further detail below.

B. Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination based on race, color, or national origin in programs and activities receiving federal financial assistance. See the definition of federal financial assistance in HUD's regulations at 24 CFR 1.2 (e) and note that federal financial assistance does not include assistance made available through direct Federal procurement contracts of insurance or guaranty. National origin minorities are provided with language accessibility protections under this Title.

C. Section 504 of the Rehabilitation Act of 1973 (Section 504)

Section 504 prohibits discrimination based on disability in any programs, services and activities receiving federal financial assistance. See the definition of federal financial assistance in HUD's Section 504 regulations at 24 CFR 8.3, and note that federal financial assistance does not include assistance made available through direct Federal procurement contracts or payments made under these contracts or any other contract of insurance or guaranty. 24 CFR Part 8 established comprehensive 504 obligations, while the Uniform Federal Accessibility Standards (UFAS) sets the standard for physical accessibility in housing projects, program offices and other covered areas.

D. Titles II and III of the Americans with Disabilities Act of 1990 (ADA)

Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. For example, Title II of the ADA applies to housing provided by public housing agencies. Title III, in most cases, does not apply to housing, however, certain parts of a housing development that are, by their nature, open to the general public, or otherwise made available to the general public, would be covered by Title III of the ADA; for example, rental offices and leasing offices. Similarly, if a common use clubhouse that is for the residents and their guests is also made available to the general public, it would be covered by Title III. Structures built or modified between July 1, 1994 and March 14, 2012 are covered by the 1991 ADA standards, while the 2010 ADA standards apply to buildings constructed or modified after March 15, 2012.



E. Architectural Barriers Act of 1968

The Architectural Barriers Act applies to certain buildings financed with Federal funds to ensure that they are designed, constructed or altered to be accessible to persons with disabilities. The Act applies to buildings, other than a privately owned residential structure, which are (1) constructed or altered by the United States after August 12, 1968, if constructed or altered in accordance with plans and specifications of the United States; or (3) financed in whole or in part by a grant or loan made by United States after August 12, 1968, if the structure is subject to standards for design, construction, or alteration issued under authority of the law authorizing such grant or loan.

For Example, the ABA applies to housing provided by public housing agencies and through HUD's Community Development Block Grant Program. For more information on the ABA see HUD's ABA regulations at 24 CFR Parts 40 and 41, as well as the Uniform Federal Accessibility Standards (UFAS).

F. Age Discrimination Act of 1975

The Age Discrimination Act Prohibits discrimination based on age in federally assisted and funded programs or activities, except in limited circumstances.

G. Executive Order 11063

Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

H. Executive Order 12892

Executive Order 12892, as amended, requires that federal agencies affirmatively further fair housing in their programs and activities and that the Secretary of HUD be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

I. Executive Order 12898

Executive Order 12898 requires that each federal agency conduct its programs, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

J. Executive Order 13166

Executive Order 13166 eliminates, to the extent possible, limited Spanish proficiency (LSP) as a barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally-conducted programs and activities. Costs for LSP-related activities are considered front-line management activities and may be charged to the project operating account, provided that the costs are reasonable for the population that will be served. Entities should refer to HUD's "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National origin



Discrimination Affecting Limited-English Proficient Persons" published in the Federal Register on January 22, 2007 (72 F.R. 2732).

K. Equal Access to Housing in HUD Programs regardless of Sexual Orientation or gender Identity

As the Nation's housing agency, HUD policy is to ensure that its programs do not involve arbitrary discrimination against any individual or family otherwise eligible for HUD-assisted or insured housing, and that its policies and programs serve as models for equal housing opportunity. Toward this goal, HUD revised its program regulations on February 3, 2012 (77 FR 5662) to ensure that its core programs are open to all eligible individuals and families without regard to actual or perceived sexual orientation, gender identity or marital status in housing assisted with HUD funds or subject to FHA insurance, and to prohibit inquiries on actual or perceived sexual orientation or gender identity for the purpose of determining eligibility for the housing or otherwise making such housing available. See also HUD's "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs," 81 FR 183.

2) RULES:

Voluntary Compliance Agreement (VCA) 2017: Agreements between PRHFA and the Department of Housing and Urban Development under cases 02-16-4437-8 and 02-17-5666-8 that require compliance with the Fair Housing Act, 504, and the ADA.

IV. PRHFA's Fair Housing Coordinators (ADA and Section 504 Coordinators)

The Fair Housing Coordinators are responsible to oversee PRHFA's implementation of its agency wide civil rights compliance policy pursuant to 28 CFR 35.107(a) and 24 CFR 8.53(a), respectively. The Fair Housing Coordinators shall receive and evaluate any reasonable accommodation and modifications request submitted by a resident, tenant, or participant with

disabilities under any of the PRHFA's housing programs, or any discrimination complaint submitted based on any allegation of a protected class (race, color, religion, national origin, sex, disability, and/or familial status). The faculties of the Coordinators include requiring management agents who employ 15 or more staff persons to adopt and publish a grievance procedure, designate at least one employee to coordinate 504 compliance efforts, disclose to PRHFA the contact details of the management agents' coordinators and monitor compliance with this policy. In the case of project owners or management agents employing 50 or more staff persons the designation of an ADA Coordinator will also be requested.

V. PRHFA's Section 8 Housing Choice Voucher Officers, Public Housing Agency (PHA) HUD's Compliance Officer (Section 8), and Project-Based Program and Moderate Rehabilitation Officers

The Section 8 Housing Choice Voucher Officers, the PHA HUD's Compliance Officer (Section 8), and the Project-Based Program and Moderate Rehabilitation Officers, shall comply with Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Act of 1988, Title II of the American with Disabilities Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act. Under these housing programs, discrimination in the terms, conditions, or privileges of rental of a dwelling or in the provision of services in connection therewith because of race, color, sex, religion, national origin, familial status or handicap, is not permitted. The faculties of the Section 8 Housing Choice Voucher Officers and the Project-Based Program and Moderate Rehabilitation Officers include receiving programmatic complaints and/or



assisting residents with special needs to submit reasonable accommodation requests. Then, the PHA HUD's Compliance Officer (Section 8) shall analyze and determine whether to approve or deny the reasonable accommodation requests. The Section 8 Housing Choice Voucher Officers and the PHA HUD's Compliance Officer (Section 8) shall comply with its responsibilities, obligations and procedures as stated under the PRHFA's Section 8 Programs Annual Administrative Plan.

VI. NONDISCRIMINATION POLICIES

PRHFA, multifamily programs and any project financed by the PRHFA's state and federal funds programs, including contractors, sub-contractors and management agents (Collectively PRHFA) must comply with federal, state and local laws that prohibit discrimination on the basis of race, color, sex, religion, national origin, familial status or disability, including but not limited to the Title VI of the Civil Rights Act (Title VI), the Federal Fair Housing Act (Title VIII), Section 504 of the Rehabilitation Act of 1973 (504) and the Americans with Disabilities Act (ADA) and while interpreting local laws and/or regulations or during the administration of state and/or federally funded housing programs.

It is necessary to provide applicants or residents with disabilities an equal opportunity to apply for and live in the housing projects under PRHFA's programs. PRHFA shall not act or arrange for any practice which may have the intentional or unintentional effect of subjecting qualified individuals with disabilities to prohibited discrimination. An applicant or resident with a disability may ask for specific changes in rules, policies, procedures, and methods of communication or may ask for physical modifications to a unit or common area to enable him/her access to a building, unit or program. Such changes are referred to as reasonable accommodations and reasonable modifications, as defined in this policy.

PRHFA, multifamily programs and any project financed by the PRFHA's state and federal funds programs must evaluate requests for reasonable accommodations to determine if and how requests can be accommodated. For purposes of this policy, there are three types of requests or complaints: (1) protected class request, (2) programmatic request, and (3) hybrid request.

A reasonable accommodation or reasonable modification request can be denied if the request constitutes a fundamental alteration in the nature of the program or constitutes an undue financial and administrative burden. The determination not to grant a reasonable accommodation shall not be made without the concurrence of PRHFA's Fair Housing Coordinators (Coordinators, as stated in Section IV of this Policy). The Coordinators are responsible for ensuring that the PRHFA complies with federal, state and local laws that protect the rights of people with disabilities, and the protected classes in compliance with the Fair Housing Act. The Coordinators are responsible to ensure the PRHFA meets its obligations set forth in these laws. The following policies are incorporated to cover the different areas protected by the civil rights laws mentioned in Section III.

Nondiscrimination Policies:

A. Complying with Civil Rights Laws:

1. Civil rights laws protect the rights of applicants and residents to equal treatment by the PRHFA in its programs. It is the policy of the PRHFA to comply with all Civil Rights laws now in effect and subsequently enacted, and any applicable State laws or local ordinances.



- The PRHFA shall not discriminate because of race, color, national origin, sex, religion, familial status, or disability in the leasing, rental, occupancy, use, or other disposition of housing or related facilities, including land that is part of a development under the PRHFA's jurisdiction covered by any federal or state funds.
- 3. PRHFA shall not deny admission to otherwise qualified applicants because of their membership in a protected group or class (e.g., families with children born to unmarried parents or families whose head or spouse is a student). Instead, each applicant who is a member of a particular group will be treated as an individual based on his or her attributes and behavior.
- 4. PRHFA shall not permit these policies to be subverted to do personal or political favors.
- Failure to speedily deal with civil rights issues could expose PRHFA and management agents to civil penalties, litigation, retrofitting and other costs associated to civil rights violations while jeopardizing PRHFA's funding with HUD.
- 6. Compliance with civil rights and fair housing requirements is a federal obligation which supersedes any other conflicting duty under local law, regulations and/or contracts.

B. Reasonable Accommodations and Reasonable Modifications Policy:

General Statements

- 1. PRHFA has a legal obligation to ensure that the project owners and management agents grant "reasonable accommodations" and/or "reasonable modifications" to applicants and residents if they or any family members have a disability.
- 2. This reasonable accommodations and modifications policy is based on federal fair housing laws and supersedes any existing policy (except for the reasonable accommodation policy contained in the Section 8 Program's Annual Administrative Plan), and/or practice applicable to PRHFA, along with contractors, subcontractors and management agents, along with all Puerto Rico laws and regulations that run afoul or in conflict.
- 3. The PRHFA's Section 8 Housing Choice Voucher Officers and the PHA HUD's Compliance Officer (Section 8) shall comply with the reasonable accommodation policy contained in the PRHFA's Section 8 Program's Annual Administrative Plan. However, the determination not to grant a reasonable accommodation shall not be made without the concurrence of PRHFA's Fair Housing Coordinators (Coordinators).
- 4. PRHFA is firmly committed to offer disabled individuals with meaningful choices of selfdetermination, opportunities to decide freely among varied housing options and to live and benefit from integrated housing facilities and services.
- PRHFA and management agents have a responsibility to mitigate potential fair housing violations including structural barriers and other physical inaccessibility and properly handle and expeditiously respond to disabled individuals' petitions, complaints or grievances.
- 6. PRHFA shall always seek to remediate the disability-related needs of requesting individuals to the maximum extent feasible and within reasonable bounds.
- 7. An accommodation or modification is not reasonable if it:
 - a. Causes an undue financial and administrative burden: or
 - b. Represents a fundamental alteration in the nature of the project.
- 8. Examples of reasonable modifications include, but are not limited to:
 - Making alterations to a unit to make it fully accessible so it could be used by a family member with a wheelchair;



- Widening the door of a community room or public restroom so a person in a wheelchair may use the facility;
- Adding or altering unit or building features so they may be used by a family member with a disability, including but not limited to;
- Installing strobe-type flashing light smoke detectors in a unit for a family with a <u>hearing-impaired member;</u>
- Adding structural grab bars in the bathroom;
- Changing the doorknobs to lever-type door handles;
- Modifying for an accessible kitchen;
- Providing accessible kitchen appliances;
- Modifying for an accessible bathroom;
- Lowering the peephole on the door;
- 9. In requesting owners and management agents physical modifications to property, (sites, parking lots, common spaces, routes through buildings and individual apartments), the following requirements apply, considering reasonable accommodations in procedures or practices:
- 10. PRHFA must, upon request by an applicant or resident with a disability, request owners and management agents to, after evaluation, make structural modifications to housing and non-housing facilities and make reasonable accommodations in procedures or practices, unless such structural modifications or reasonable accommodations: would result in an undue financial and administrative burden on the PRHFA or the owner or the management agent who benefits by the PRHFA's Programs, or would result in a fundamental alteration in the nature of the program.
- 11. Examples of reasonable accommodations include, but are not limited to:
 - Transferring a resident from a unit that cannot be made accessible to a unit that is accessible;
 - Allowing a family to have an animal to assist a family member with a disability in a development where no pets are allowed, or the size of the animal is usually limited;
 - Allowing a resident with a disability to a have a live-in-aid in the house;
 - Making sure that PRHFA processes are understandable to applicants and residents with sensory or cognitive impairments, including but not limited to:
 - i. Making large type documents, Braille documents, cassettes or a reader available to an applicant or resident with a vision impairment during interviews or meetings with PRHFA staff:
 - Making a sign language interpreter available to an applicant or resident with a hearing impairment during interviews or meetings with PRHFA staff;
 - iii. Permitting an applicant or resident to be accompanied or represented by a family member, friend or advocate at all meetings and interviews with PRHFA if the individual desires such representation;
 - iv. Permitting an outside agency or individual to assist an applicant or resident with a disability to meet the PRHFA's applicant screening criteria.
 - v. If the residents do not accept PRHFA's attempts of reasonable accommodation the residents cannot hold PRHFA liable for failure to make reasonable accommodations.
- 12. An applicant or resident family that has a member with a disability must still be able to meet essential obligations of tenancy. They must be able:



- a. To pay rent and other charges (e.g. utility bills) as required by the lease in a timely manner;
- b. To care for and avoid damaging the unit and common areas;
- c. To use facilities and equipment in a reasonable way;
- d. To create no health, or safety hazards, and to report maintenance needs;
- e. Not to interfere with the rights and peaceful enjoyment of others, and to avoid damaging the property of others;
- f. Not to engage in prohibited criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises by other residents or staff; and not to engage in drug-related criminal activity; and
- g. To comply with necessary and reasonable rules and program requirements of HUD and the PRHFA, with or without assistance.
- 13. If an applicant or resident receives a referral to an agency or individual who can assist the applicant or resident with complying with the essential obligations of tenancy, the applicant or resident is not obligated to accept the service, but if refusing the service results in a lease violation, PRHFA, the owner or the management agent may terminate the lease.
- 14. A reasonable accommodation or modification may be requested any time an applicant or resident with a disability needs or wants a reasonable accommodation, and/or modification.
- 15. If an applicant or resident would prefer not to discuss the situation with the PRHFA, that is his/her right.
- 16. If the applicants or residents do not inform PRHFA of their disability needs or if they are unwilling to disclose the fact that they have a disability, PRHFA will not be able to make reasonable accommodations, and/or modifications.
- 17. PRHFA has an ongoing responsibility to make modifications in procedures and practices to ensure that its programs are fully accessible to persons with disabilities. In the same way, the PRHFA, the owners and management agents must keep an effective record of the applications received and the final disposition of the same.
- 18. An applicant can demonstrate obvious, non-visible impediments in various ways, such as through a Social Security disability check, parking decal for the disabled, medical certification, verification of a social worker or health professional, etc. Only if the verification provided fails to establish a link between the resident's disability and the demanded accommodation, the Administrator may request additional information and/or request the resident's written consent for medical disclosure.
- 19. Projects with multi-family subsidies should allow and immediately execute transfer requests within residents' projects to accommodate verified physical or mental conditions caused by long-term illnesses, medical conditions and/or disabilities.
- 20. The PRHFA, the owners, or management agents must maintain a procedure which expresses how requests for reasonable accommodations or modifications, both written and oral, will be processed and decided.

Procedure for Requesting a Reasonable Modification or a Reasonable Accommodation

21. Any disabled applicant or resident interested in a reasonable accommodation or a reasonable modification can make the request directly with the PRHFA Section 8 Housing Choice Voucher Officers, the PHA HUD's Compliance Officer (Section 8), the Project-Based Program and Moderate Rehabilitation Officers, the project owner or management agent or with the Coordinators at any point during the disabled person's participation in the housing program.



- 22. The request may be lodged by the disabled resident or by another person residing with or acting on behalf of the handicapped person.
- 23. The request does not have to be in any particular format or mention the words "reasonable accommodation" or "reasonable modification" to be regarded as such.
- 24. The request may be verbal or in writing. If it is verbal the PRHFA Section 8 Housing Choice Voucher Officers, the Section 8 HUD's Compliance Officer, the Project-Based Program and Moderate Rehabilitation Officers, the project owner or management agent or the Coordinators will document in writing the request, although it is recommended that requests are made in writing.
- 25. Applicants and residents may request reasonable accommodations and modifications at any time. Although these may be made verbally, for reasons of clarity to both parties, PRHFA strongly encourages that requests be lodged in writing directly with its offices or via regular mail at: Coordinador Fair Housing, Federal Funds Compliance Office, PRHFA PO Box 71361 San Juan, PR 00936-8461; 'fax 787-620-3531 or email acomodorazonable@afv.pr.gov. If a management agent receives any request from a disabled tenant, the management agent will immediately forward the petition via regular mail at: Coordinador Fair Housing, Federal Funds Compliance Office, PRHFA, PO Box 71361 San Juan, PR 00936-8461; fax 787-620-3531 or email acomodorazonable@afv.pr.gov.
- 26. The PRHFA's Section 8 Housing Choice Voucher Officers, the PHA HUD's Compliance Officer (Section 8), the Project-Based Program and Moderate Rehabilitation Officers, and the project owner or management agent shall send to the Fair Housing Coordinators the information concerning all the received reasonable accommodations and modifications requests under their programs and their final disposition. The PRHFA's Fair Housing Coordinators will maintain an updated log of all reasonable accommodations and modifications requests which tracks all received requests and their final disposition.
- 27. In cases where it is necessary the Coordinator will assist residents with special needs to submit reasonable accommodation and modification requests. Requests submitted in alternate format (such as a tape recording of the request) will be accepted if these are necessary due to a person's disability.

Evaluation and Determination of a Reasonable Accommodation of Modification Request

- 28. Once a request is lodged, the Coordinator will acknowledge its receipt by regular mail, email, fax or by date-stamping a copy of the petition.
- 29. If applicable, the Coordinator may enter in the following analysis to decide which of the following three scenarios applies to the petitioner's case and whether the petitioner should be contacted to better understand his/her disability-related needs, and further assess the request. The three possible scenarios are as follows:
 - a. The individual's disability and the need for the requested accommodation are not visible, readily apparent or known to the administrator, management agent and/or PRHFA: In this instance, PRFHA's reviewer must verify the person's disabling condition by requesting that documentation from a professional (such as a doctor, a medical professional or a reliable third party that is in a position to know about the individual's disability) be submitted. The petitioner or the certification submitted must also explain the relationship between the accommodation being requested and the person's disability. There must be an identifiable relationship, or nexus, between both. PRHFA will only request information that is necessary



- to evaluate the disability- related need for the accommodation and will not inquire about the nature or extent of any disability.
- b. The person's disabling conditions are visible, known or obvious, but the need for the accommodation is not known or clear: In such cases, PRFHA may request information that is necessary to evaluate the disability-related need for the accommodation; a professional certification from a doctor, a medical professional or a reliable third party that is in a position to know about the individual's disability. The petitioner or the certification submitted must also explain the connection or relationship between the requested accommodation and the person's disability. PRHFA will only request information that is necessary to evaluate the disability- related need for the accommodation and will not inquire about the nature or extent of any disability.
- c. The person's disability is visible, known or obvious and the need for the accommodation is clear or known: Since the disability and the disability-related need for the requested accommodation are both clear, PRHFA may not require additional information about the disability or the need for the accommodation. In such instances, the request for a reasonable accommodation or modification will suffice.
- 30. Within 30 days of the petition being received at PRHFA's office, PRHFA's Coordinator will analyze the reasonable accommodation and/or modification requests and determine whether to approve or deny them and will notify the petitioner in writing of the approval or denial decision.
- 31. If the request is granted the project Administrator or management agent will implement the change as soon as possible, but no later than ten (10) business days from the date of the issuance and notification of the decision. If applicable, PRHFA will send written notification explaining the granted accommodation to the project Administrator or management agent.
- 32. If PRHFA's Coordinator denies a petition, the decision will be notified in writing and shall explain the reason(s) for the denial in plain understandable language.
- 33. If PRHFA's Coordinator finds the request is unreasonable, prior to denying the petition, the Coordinator shall initiate a dialogue with the disabled individual and project Administrator or management agent with the purpose of proposing and finding possible reasonable alternatives that could effectively meet the person's needs without imposing an undue burden.
- 34. Management agents must adopt and adhere to the instant policy.

How to appeal a denial of a Reasonable Accommodation of Modification Request

- 35. All determinations will offer the petitioner the right to revise the decision in an Informal Hearing.
- 36. The notification will inform the petitioner of his right to request a review of the determination and an informal hearing within 30 days of receipt of the decision.
- 37. When management agents make determinations on reasonable accommodations or modifications petitions they must also notify the petitioner of his or her right to request a review and an informal hearing with PRHFA.
- 38. Once a request for review and informal hearing is received PRHFA will promptly schedule the informal hearing.
- 39. The petitioner can appear to the informal hearing with legal representation, interpreters or other assistance that might be needed to request the review and present evidence to support the petition.
- 40. After the informal hearing is conducted the decision will be notified to the petitioner in writing.



41. All reasonable accommodations or modifications decisions will notify the petitioner of his or her right to file a complaint with the Office of Fair Housing and Equal Opportunity of the U.S. Department of Housing and Urban Development (Tel.: 787-274-5834; Parque Las Americas I 235 Federico Costa St. Suite 200 San Juan, PR 00918), or to complaintsOffice02@hud.gov.

C. Policy on Making Programs and Facilities Accessible to People with Disabilities

- Subject to structural infeasibility and/or site impracticality tests, PRHFA will request owners and
 management agents to correct physical situations that create a barrier to equal housing
 opportunity for all. To permit people with disabilities to take full advantage of the PRHFA's
 housing and non-housing programs, in accordance with Section 504, ADA and the Fair Housing
 Act and its amendments, PRHFA shall comply with all requirements and prohibitions in
 applicable law.
- 2. Facilities and programs used by applicants and residents shall be accessible to persons in wheelchairs, persons with sensory impairments and other persons with disabilities. Application and management offices, hearing rooms, community centers, etc. (to the extent that the projects under PRHFA's programs have such facilities) will be usable by residents with a full range of disabilities. If a project offers such facilities, and none is accessible, PRHFA shall request owners and management agents make some accessible, subject to the structural infeasibility and/or site impracticality test.
- Documents and procedures used by applicants and residents will be accessible for those with vision, hearing or other sensory impairments. Also, all documents will be written simply and clearly to enable applicants with learning or cognitive disabilities to understand as much as possible.

D. Policy for Providing Information in Languages other than Spanish

- All forms, written materials and recorded voice-mail messages used to communicate with prospective applicants and residents shall be available in English and Spanish. This includes but is not limited to the following documents related to registration, intake, certification, reexamination and inspections:
 - Forms;
 - Leases;
 - Posters;
 - Letters; and
 - Notices
- 2. At all PRHFA offices notices that state the above mentioned will be available in English and Spanish.

E. Nondiscrimination Policy: The Fair Housing and Civil Rights Acts require that:

- 1. PRHFA shall not, on account of race, color, national origin, sex, religion, familial status, or disability:
 - Deny anyone the opportunity to apply for housing (when the waiting list is open), nor deny to any qualified applicant the opportunity to lease housing suitable to their needs;
 - Provide anyone housing that is different (of lower quality) from that provided others;
 - Subject anyone to segregation or disparate treatment;



- Restrict anyone's access to any benefit enjoyed by others in connection with the housing program;
- Treat anyone differently in determining eligibility or other requirements for admission;
- · Deny anyone access to the same level of services; or
- Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program.
- PRHFA makes all written materials to be used by or sent to applicants or residents available in both English and Spanish language versions. Complex documents, such as the Lease and Grievance Procedure are available in both English and Spanish versions.
- 3. Persons who are fluent in English are available for interviews, meetings and other forms of face-to-face. All forms, written materials and recorded voice-mail messages used to communicate with prospective applicants and residents shall be available in Spanish and English. This includes but is not limited to the following documents related to registration, intake, certification, re-examination and inspections:
 - a. Forms;
 - b. Leases;
 - c. Posters;
 - d. Letters; and
 - e. Notices

F. Effective Communication Policy

It is the policy of the PRHFA to ensure that communications with applicants, residents, employees, and members of the public with disabilities are as effective as communications with others.

PRHFA, including its employees, agents, contractors and private management companies/agents, shall furnish appropriate auxiliary aids and services, where necessary, to afford individuals with disabilities, including individuals with hearing or visual disabilities, an equal opportunity to participate in, and enjoy the benefits of, the programs, services and activities conducted by the PRHFA.

"Auxiliary aids and services" include, but are not limited to: (1) qualified sign language interpreters, note-takers, transcription services, written materials, telephone handset amplifiers, assistive listening devices, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDDs), videotext displays, or other effective methods of making aurally delivered materials available to individuals with hearing impairments; and, (2) qualified readers, taped texts, audio recordings, brailed materials, large print materials, or other effective methods of making visually delivered materials available to individuals with visual impairments.

- 1. PRHFA, the owner or the management agent who benefits from PRHFA's Programs will communicate with all persons with disabilities in a manner that is understandable to them.
- 2. Simply mailing out written material is insufficient.
- 3. People who have sensory or cognitive impairments are entitled to the form of communication that they request and that will be intelligible to them.
- 4. In some cases, this will require different forms of communication (large print, Braille, taped materials, sign language interpretation); and in other cases, it will require communicating with



- someone other than or in addition to the applicant or resident (a family member, friend, advocate, case worker, etc.), as requested by the applicant or resident.
- 5. When PRHFA, the owner or the administrator company who benefits from PRHFA's Programs has first contact with an applicant, they must ask whether the applicant needs some form of communication other than plain language paperwork. Alternative forms of communication might include:
 - Sign language interpretation;
 - · Having materials explained orally by staff, either in person or by phone;
 - · Large type materials; information on tape;
 - Having someone (friend, relative or advocate) accompany the applicant to receive, interpret and explain housing materials;
 - · Permitting applicants to file applications by mail; and
 - · Permitting alternative sites for application taking.
- 6. If an applicant requests alternate forms of communication, the applicant's file is noted and all future communications (notices, letters, etc.) are provided in the appropriate format. The note explaining the alternate method of communication must always stay on the top left side of the folder.
- 7. PRHFA, the owner or the administrator company who benefits from the PRHFA's Programs can use examples to help persons with cognitive impairments understand eligibility, rent computation, applicant screening, reasonable accommodations, and lease compliance.
- 8. PRHFA staff, the owner or the administrator company who benefits by the PRHFA's Programs shall explain rules and benefits verbally, as often as may be needed, because some disabilities may affect an applicant's ability to read or understand.
- 9. Intake and management staff will read and explain anything that they would normally hand to an applicant and/or resident who cannot read (or cannot read English or Spanish)
- 10. PRHFA must provide written material in English and Spanish.
- 11. Applicants and residents who read or understand little English or Spanish may request from PRHFA an interpreter who can explain what is going on.
- 12. PRHFA prepares the following information for applicants and residents in plain-language accessible formats:
 - Information about the application process
 - General statement about reasonable accommodation
 - How rents and utility allowances are determined; if applies
 - The application form and required certifications
 - · Information about opening, updating or closing the waiting list
 - All form letters and notices to applicants and residents.
 - Information about hearings for rejected applicants
 - All information related to applicant's rights (to informal hearings, Grievance Procedure etc.)
- 13. Some applicants and residents with disabilities will be unable, because of their disabilities, to come to PRHFA facilities for meetings, interviews, etc. In this case, PRHFA staff or the owner or the administrator company who benefits by the PRHFA's Programs will go to their location to conduct meetings, interviews, etc.
- 14. PRHFA, the owner, or the management agent, when applicable, bear the cost for providing alternate methods of communication, plain language paperwork and going to the homes or other locations to effectively reach residents with disabilities.



G. PET POLICY TO ALLOW ASSISTANCE, SERVICE AND/ OR THERAPY ANIMAL.

- 1. The no-pet policy is not applicable to persons with disabilities who need a reasonable accommodation in the form of an assistance, service and/or therapy animal.
- 2. Immediately upon receipt of an assistance animal accommodation request or certification, the administrator will temporarily allow the animal, until a decision to either grant or deny the petition is made. During the pendency of the petition, the Administrator shall automatically stay and not proceed with any adverse action, including lease cancellation, termination of HUD assistance, and/or eviction, which may have been pending at the time of the request, against the disabled resident or an otherwise associated individual. If the Administrator eventually denies the request, the adverse actions against the resident, including asking for the pet's removal will resume.
- 3. Should a resident family be found in possession of a non-authorized pet in violation of a no-pet rule, Administrator shall mail and hand-deliver a letter explaining the process for requesting an accommodation and granting a thirty (30) day grace period for the tenant family to prove the disability-related need for the animal. If the resident does not fulfill the accommodation requirements during this period, the Administrator may initiate whatever measures are permitted for no-pet rule violations, including asking for the pet's removal and,
- 4. In case of repeated non-compliance, terminating HUD's rental subsidy. Such adverse actions, of course, must be suspended immediately upon receipt of an assistance animal certification or accommodation request, as explained in the above provision.
- 5. Disabled residents and otherwise associated individuals must maintain assistance animals responsibly and provide for their proper care in conformity with applicable local laws related to public health, animal control and animal anti-cruelty. This includes ensuring that assistance animals obtain required vaccinations and current inoculations, such as but not limited to rabies, and providing the Administrator with annual veterinary records verifying inoculations throughout the duration of the assistance animal's stay;
- 6. Disabled residents may be with their assistance animals in all areas of the premises where persons are normally allowed to go. However, disabled residents and otherwise associated individuals are responsible for retaining full control of their assistance animals at all times, and ensuring they are well behaved, under the owner's direct control and do not cause any damage to any common area of their housing project;
- 7. Assistance animals shall always be kept on a leash, in a carrier or within the owner's control and cannot be allowed to nip or bite other persons or animals;
- 8. Disabled residents and otherwise associated individuals must promptly pick up their assistance animals' feces and dispose of them in a safe and sanitary manner;
- 9. If a disabled resident or an otherwise associated individual fails to comply with any of the above-mentioned requirements, in collaboration with and the written concurrence of the Coordinator, the Administrator will send a written notice to the person describing the animal's inappropriate behavior. If the unruly behavior persists after the notice, the Administrator may require that the animal not be allowed in a common area or limited common area until steps have been taken to mitigate the behavior (such as use of a muzzle). If mitigation is not undertaken or if it is ineffective, then the Administrator may increase penalties and ultimately require the animal's removal.
- 10. No disabled household occupying or which hereafter occupies a Multifamily-subsidized dwelling shall be evicted solely for possessing an assistance, therapy or service animal at a housing development with a not pet rule.



H. NO RETALIATION POLICY

The PRHFA, project owners or management agents will not impose any fee or cost for reasonable accommodation or modification requests or otherwise harass, intimidate or retaliate against any person for having made, aided, encouraged or assisted another person to make a disability or civil rights-related request.

VII. ENFORCEMENT PROVISIONS POLICY

The PRHFA establishes the following enforcement provisions to compel project owners and management agents to comply with civil rights laws and guarantee that applicants and residents are not discriminated by the housing providers or when they seek a service.

- Pursuant to 24 CFR 8.53(a), request project owners and management agents who employ 15 or more staff persons to: (a) adopt and publish a grievance procedure, (b) designate at least one employee to coordinate 504 compliance efforts, and (c) disclose to PRHFA the name and contact details of the 504 Coordinator.
- 2. Pursuant to 28 CFR 35.107(a), request project owners and management agents who employ 50 or more staff persons to: (a) adopt and publish a grievance procedure, (b) designate at least one employee to coordinate ADA compliance efforts, and (c) disclose to PRHFA the name and contact details of the ADA Coordinator.
- Request management agents of Multifamily sites to perform Accessibility Self-Evaluations to determine if accessibility requirements of the Fair Housing Act's Design Manual, ADA standards and the Uniform Federal Accessibility Standards (UFAS) are met and request corrective actions if they are not.
- 4. PRHFA has a firm commitment to offer disabled individuals with meaningful choices of self-determination and opportunities to decide freely among varied options and to live and benefit from integrated housing facilities and services.
- 5. It is the responsibility of PRHFA, the project owners and management agents to mitigate potential fair housing violations, including structural barriers and other physical inaccessibility, and properly handle and expeditiously respond to disabled individuals' petitions, complaints and/or grievances.
- Failing to speedily deal with civil rights issues could expose PRHFA and management agents to civil penalties, litigation, retrofitting and other costs associated to civil rights violations while jeopardizing PRHFA's funding with HUD.
- 7. Civil rights complaints filed with PRHFA by Multifamily residents' families shall remain open and could put management agents at risk of monetary and other sanctions, unless satisfactory proof of having fully corrected and completed all deficiencies is provided to PRHFA.
- 8. PRHFA will exercise its authority as Housing Agency (HA) to prevent civil rights violations at all institutional levels, which includes exercising the following powers:
 - the authority to inspect and require services and changes to HUD-subsidized housing and other premises, including the program offices of contractors, subcontractors, project owners and management agents;
 - b. review files and copy documents in any way related to housing, program activities, and/or the investigation of discrimination complaints;
 - c. maintain for each management agent a monitoring file regarding any civil rights review, investigation or complaint resolution;
 - d. investigate complaints, monitor program compliance and evaluate program activities;



- e. perform civil rights monitoring of recipient owners and management agents participating under HUD's Multifamily Program;
- f. issue letters of findings identifying civil rights violations and requiring their resolution before and after HUD's intervention;
- g. require the speedy performance of corrective actions;
- h. sanction or otherwise penalize if corrective actions that have been required in writing are not implemented;
- review and overturn any decision which PRHFA and/or HUD determines to affect or adversely impact a disabled tenant and/or resident; and
- j. any other mechanism deemed necessary for achieving robust enforcement of fair housing laws
- 9. PRHFA will use a diverse array of methods to enforce fair housing laws and ensure utmost compliance, including but not limited to the following:
 - a. coordinated data collection;
 - b. enhanced civil rights planning;
 - c. proactive monitoring;
 - d. due diligence;
 - e. cooperative foresight;
 - f. corrective actions;
 - g. barrier removals;
 - h. sanctions;
 - i. program accessibility reviews;
 - j. referral to HUD's Fair Housing and Equal Opportunity Office and/or Enforcement Center; and
 - k. any other mechanism deemed necessary for achieving robust enforcement of fair housing laws

VIII. CIVIL RIGHTS POLICY STATEMENT

It is the policy of the PRHFA to provide fair and equal opportunities to families and individuals in all its programs and services. To that end, PRHFA is committed to ensure that no person is excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or service conducted by, or under the jurisdiction of, PRHFA because of race, color, national origin, religion, age, sex, familial status, disability, marital status, sexual orientation, gender identity or any other protected classification under federal or state law. PRHFA will not tolerate discrimination against any person seeking to participate in, or receive the benefits of, any of PRHFA's programs or services.

Federal and State nondiscrimination laws are the cornerstones of PRHFA's Civil Rights Policy. This policy aims to ensure that all PRHFA's programs and services prohibit arbitrary or unlawful discrimination against families or individuals. It reflects PRHFA's firm commitment to ensure that the public has access to equal housing opportunities as well as to fair and equitable programs and services.

This policy is in accordance with Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Section 504 of the Rehabilitation Act of 1973, The Age Discrimination Act of 1975 and Title II of the American with Disabilities Act of 1990. It also follows HUD's Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity rule.



IX. APPLICATION

This policy applies to all PRHFA employees, as well as to all contractors, subcontractors, management agents, or grantees that provide benefits and services to the public or participate under HUD's Multifamily programs.

X. COMPLAINTS

Any person who believes they may have been discriminated or unlawfully denied full and equal access to a program or service offered, conducted, or administered by PRHFA, based on their belonging to a protected class, may file a complaint with PRHFA up to one year after the discriminatory housing practice occurs or ends. Although these may be made verbally, for reasons of clarity to both parties, PRHFA strongly encourages that complaints be lodged in writing directly with its offices or via regular mail at: Coordinador Fair Housing, Federal Funds Compliance Office, PRHFA PO Box 71361 San Juan, PR 00936-8461; fax 787-620-3531 or email Complaints@afv.pr.gov. Housing discrimination complaints received by any program area of the PRHFA will be referred to the Fair Housing Coordinator in the Federal Funds Compliance Office. Complaints will be processed in accordance with this policy and the procedure established in Section V. B. 36-42 and PRHFA's Regulation for the Adjudicative Proceedings of Administrative Complaints for areas not covered by this Civil Rights and Fair Housing Compliance Policy.

The discriminatory housing practice complaint process is the following:



- 1. The Coordinator will begin to evaluate the complaint within thirty (30) days of receiving the complaint.
- 2. The Coordinator will assess the complaint to determine whether it is a possible discriminatory housing practice or other type of complaint.
- 3. If the complaint is deemed not to be a discriminatory housing practice it will be referred to the respective PRHFA program area.
- 4. If the complaint is deemed to be a possible discriminatory housing practice, the Coordinator will commence an investigation.
 - a. The Coordinator will seek the voluntary cooperation of all parties to obtain access to premises, records, documents, individuals, and other possible sources of information; to examine, record, and copy necessary materials; and to take and record testimony or statements from persons deemed necessary for the furtherance of the investigation.
 - b. The Coordinator will request the concerning program area and/or management agent to submit a case report.
 - c. The concerning program area and/or management agent shall prepare a case report and provide potential corrective measures. This report shall be submitted to the Fair Housing Coordinator.
- 5. Once the Coordinator reaches a final determination, the Coordinator will submit the applicable recommendation to the PRHFA Federal Funds Compliance Director.
- 6. The Coordinator will complete the investigation of the alleged discriminatory housing practice within a hundred (100) days of receiving the complaint.
- 7. The Federal Funds Compliance Office will inform the complainant and the management agent, or the party whom the complaint has been made against, of the recommended corrective actions. The management agent will implement the corrective actions as soon as possible, but no later than ten (10) business days from the date of the notification of the decision. If applicable, PRHFA will send written notification explaining the corrective actions and the conditions to the management agent.

8. If after a thorough investigation the Coordinator finds there is no reasonable cause to believe that housing discrimination has occurred or is about to occur, the Coordinator will recommend the Federal Funds Compliance Director to issue a determination of no reasonable cause. The Complainant will be notified in writing and the notification shall explain the reason(s) for the no cause determination in plain understandable language.

Additionally, the complainant can file the complaint with HUD up to one year after the discriminatory housing practice occurs or ends. Housing Discrimination Complaints can be filed at HUD's office of Fair Housing and Equal Opportunity in Washington, D.C. and its field or regional offices, over the phone, and online via HUD's website: (https://portalapps.hud.gov/FHEO903/Form903/Form903Start.action). Call HUD at 1-800-669-9777 (TTY: 800-927-9275) or visit www.hud.gov for more information about filing a complaint.

US DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT Office of Fair Housing and Equal Opportunity	ATLANTA REGIONAL OFFICE US DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT	PUERTO RICO FHEO FIELD OFFICE
451 7th Street, S.W.	Five Points Plaza Building	235 Federico Costa Street
Washington, DC 20410-2000	40 Marietta Street	Suite 200
	Atlanta, Georgia 30303-2806	San Juan, Puerto Rico 00918
Telephone (202) 708-112	Telephone (404) 331-5136	Telephone (787)274-5834
Fax (202) 708-1425	Fax (404) 730-2392	TTY (787) 766-5909
TTY (202) 708-1455	TTY (404) 730-2654	ComplaintsOffice02@hud.gov

In the case that the complainant submits the complaint to HUD's Fair Housing and Equal Opportunity Office, who then refers the same to the PRHFA, the PRHFA must respond within ten (10) days as established in 24 CFR part 103.

The procedure herein indicated shall be followed during the evaluation and answer of the complaint within ten (10) days:

- 1. The Federal Funds Compliance Office receives the complaint and refers the same to the Fair Housing Coordinators who immediately proceeds to:
 - a. Evaluate its content.
 - b. If necessary, request the concerning program area and/or management agent to submit a case report.
- 2. The concerning program area or management agent shall prepare a case report and provide potential corrective measures. This report is submitted to Fair Housing Coordinator.
- 3. The Section Fair Housing Coordinator evaluates the case report and offers the applicable recommendation to the PRHFA Federal Funds Compliance Office.
- 4. The PRHFA Federal Funds Compliance Office elaborates a formal answer to the Complaint and submits the response to the HUD's Fair Housing and Equal Opportunity Office.
- 5. If HUD's Fair Housing and Equal Opportunity Office deems it necessary, it may require additional information before its determination.
- 6. If a Conciliation Agreement needs to be entered into, the PRHFA Federal Funds Compliance Office will follow—up the corresponding program area to ensure compliance with the terms of the agreement. Program areas include all programs under the PRHFA, management agents and project owners.



XI. REFERENCE MATERIALS

The Role of Housing in Accomplishing the Goals of Olmstead *available at* http://portal.hud.gov/hudportal/documents/huddoc?id=OlmsteadGuidnc060413.pdf

HUD's memo regarding emotional support and other disability-related animals *available at* https://portal.hud.gov/hudportal/documents/huddoc?id=servanimals ntcfheo2013-01.pdf

HUD's Harassment and Discrimination Liability rule *available at* https://s3.amazonaws.com/public-inspection.federalregister.gov/2016-21868.pdf

HUD's Guidance on Enforcement of Local Nuisance and Crime-Free Housing Ordinances available at https://portal.hud.gov/hudportal/documents/huddoc?id=FinalNuisanceOrdGdnce.pdf

Joint Statements from HUD and the U.S. Department of Justice:

- Reasonable Accommodations available at http://www.hud.gov/offices/fheo/library/huddojstatement.pdf;
- Reasonable Modifications available at http://www.hud.gov/offices/fheo/disabilities/reasonable modifications mar08.pdf

Design and Construction available at http://www.treasurer.ca.gov/ctcac/2013/hud doj.pdf

Statement from HUD:

New ADA Regulations and Assistance Animals as Reasonable Accommodations *available at* http://servicedogcentral.org/content/files/HUD%20FHEO%202-17-2011%20Assistance%20Animal%20Memo.pdf

Memorandum of Understanding Among the Department of the Treasury, HUD, and the U.S. Department of Justice:

Low Income Housing Tax Credit *available at* http://portal.hud.gov/hudportal/HUD?src=/program offices/fair housing equal opp/lihtcmou

XII. APPROVAL

This Policy will take effect immediately after its approval and replaces any previous policy.

In San Juan Puerto Rico, today October 4, 2019 2019.

Luis C. Fernández Trinchet, Esq

Executive Director

pori Pablo Muniz