

DISCRIMINATION

AGAINST PERSONS WITH DISABILITIES **Barriers at Every Step**

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1. INTRODUCTION AND SUMMARY

Not enough is known about the prevalence of housing discrimination against persons with disabilities. Only slightly more than half of Americans know that it is illegal for landlords to refuse to make reasonable accommodation for persons with disabilities or to permit reasonable modification to a housing unit.¹ And although HUD data indicate that the volume of Fair Housing Act disability-related complaints is now comparable to complaints based on race, no rigorous estimates of housing discrimination against persons with disabilities are available.² A few organizations have conducted tests for discrimination against persons with disabilities, but these testing efforts were not designed to provide statistically valid measures of the incidence and forms of discrimination market-wide.³

Study Purpose and Scope

The U.S. Department of Housing and Urban Development (HUD) contracted with the Urban Institute to advance the state-of-the-art in testing to measure discrimination against persons with disabilities, for both research and enforcement purposes. Because the population of persons with disabilities is diverse and the challenges for effectively measuring discrimination are substantial, this research effort was conducted in two phases. The first phase was exploratory; the Urban Institute developed and implemented a wide variety of testing approaches, targeted to different groups of persons with disabilities and different forms of housing market discrimination (other than discrimination through a failure to design and construct accessible housing, which is not encompassed in the scope of this study).⁴ This phase did not produce statistically representative measures of discrimination for any group, but

¹ M. Abravanel and M. Cunningham (2002). *How Much Do We Know: Public Awareness of the Nation's Fair Housing Laws*. Washington, D.C.: U.S. Department of Housing and Urban Development.

² See National Council on Disability (November 6, 2001). *Reconstructing Fair Housing*.

³ Organizations that have conducted disability-related testing include Fair Housing Contact Service, Akron, Ohio; HOPE Fair Housing Center, Wheaton, Illinois; Metro Milwaukee Fair Housing Council, Milwaukee, Wisconsin; Housing Opportunities Made Equal, Richmond, Virginia; Austin Tenant's Council, Austin, Texas; Toledo Fair Housing Center, Toledo, Ohio; North Dakota Fair Housing Council, Bismarck, North Dakota; Protection and Advocacy, Inc, Albuquerque, New Mexico; Family Housing Advisory Services, Omaha, Nebraska; Access Living, Chicago, Illinois; Metro Fair Housing Services, Atlanta, Georgia; Project Sentinel, Palo Alto, California; Inland Fair Housing, Ontario, California; Housing Rights Center, Los Angeles, California; Fair Housing of Marin, San Rafael, California; Southern Arizona Fair Housing Center, Tucson, Arizona; Arkansas Fair Housing Council, Arkadelphia, Arkansas; Fair Housing Council of Southwest Michigan, Kalamazoo, Michigan; South Suburban Fair Housing Council, Philadelphia, Pennsylvania.

⁴ Exploratory testing was conducted during the spring and summer of 2003 in two metropolitan areas – Albuquerque, New Mexico and Chicago, Illinois.

it did yield important lessons about what works and what does not, and how conventional testing methods can be adapted to effectively capture the kinds of discrimination that persons with disabilities experience when they search for rental housing.

Based upon lessons from the exploratory phase, the second—pilot—phase was designed to produce rigorous, statistically representative estimates of the incidence of discrimination against selected groups of persons with disabilities in a single metropolitan rental market – Chicago, Illinois. Specifically, this phase focused on the treatment of deaf people who use the TTY system⁵ to inquire about advertised rental housing, and on the treatment of persons in wheelchairs who visit rental properties in person to inquire about available units.⁶

Summary of Findings

Both groups of persons with disabilities who were studied in the pilot phase of this project encounter significant levels of adverse treatment when they search for rental housing in the Chicago area, compared to comparable nondisabled homeseekers. In fact, adverse treatment against persons with disabilities occurs even more often than adverse treatment of African American or Hispanic renters in the Chicago-area housing market.

People who are deaf and use the TTY system to inquire about advertised rental units in the Chicago Metropolitan Area are refused service in one out of four calls. Even when housing

I arrived at the property at 11:15. I was looking for the 701 buzzer to ring as I had been instructed in my appointment call. A woman who I assume I spoke to yesterday to make an appointment opened the doorway halfway. She asked me if I was the one who had an appointment. I told her yes. She very abruptly stated, "No wheelchairs here. You can't come in!" I attempted to ask if there was another entrance that I could use to enter the building. She muttered "you should have said something on the phone." She asked twice, "Can you walk?" I told her no. She repeated, "No wheelchairs here, no way in!" She said, "Apartment's too small." I looked at her dumbfounded and replied, "OK!"

Later that day, the nondisabled tester visited the same property. She was buzzed into the lobby of the building, which had an elevator, shown three available apartments, and provided information about rents, security deposits, and fees.

⁵ Note that other people with hearing and communication disabilities may also rely on the TTY system, and that findings from this analysis would apply to them as well.

⁶ The pilot phase testing was designed to measure the extent to which persons with disabilities experience adverse treatment when they search for housing in the Chicago area. The question of when differential treatment warrants prosecution and the related question of whether sufficient evidence is available to prevail in court can only be resolved on a case-by-case basis, which might also consider other indicators of treatment than those reported here. The tests used for this study were conducted for research purposes, not enforcement purposes.

providers accept their calls, the TTY users receive significantly less information about the application process and fewer opportunities for follow-up contact than comparable hearing customers making telephone inquiries.

People using wheelchairs who visit rental properties in the Chicago area⁷ to inquire about advertised units are just as likely as nondisabled customers to meet with a housing provider. However, wheelchair users learn about fewer available units than nondisabled customers in more than one of every four visits and are denied the opportunity to inspect any units in three of ten visits. Wheelchair users also receive less information about the application process. On the other hand, they appear to be quoted lower fees than comparable nondisabled customers.

In addition, persons with disabilities are frequently denied their requests for reasonable modification and reasonable accommodation⁸ needed to make the available housing fully accessible to them. Almost one of every six housing providers who indicated that units were available refused to allow reasonable unit modifications needed by wheelchair users. And 19 percent of those with on-site parking refused to make the reasonable accommodation of providing a designated accessible parking space for a wheelchair user.

Discrimination is not the only obstacle that people with mobility impairments face in searching for rental housing. In the Chicago area, at least a third of advertised rental properties are simply not accessible for wheelchair users to even visit.⁹ This study found that paired testing is a feasible and effective tool for detecting and measuring discrimination by rental housing providers against persons with disabilities. It can be used to capture *both* differential treatment discrimination *and* refusal to make reasonable accommodation or permit reasonable

⁷ Wheelchair tests were conducted in the City of Chicago and surrounding Cook County.

⁸ A reasonable modification, 42 U.S.C. § 3604(f)(3)(A), is a structural change made to the premises, while a reasonable accommodation, 42 U.S.C. § 3604(f)(3)(B), is a change, exception, or adjustment to a rule, policy, practice, or service. Both a reasonable modification and a reasonable accommodation may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. A request for a reasonable modification or reasonable accommodation may be made at any time during a tenancy. The Act makes it unlawful for a housing provider or homeowners' association to refuse to allow a reasonable modification or reasonable accommodation when such a modification or accommodation may be necessary to afford persons with disabilities full enjoyment of the premises. To show that a requested modification may be necessary, there must be an identifiable relationship between the requested modification or accommodation and the individual's disability. Further, the modification or accommodation must be "reasonable."

⁹ This study did not determine how many of these properties were covered by the design and construction requirements of the Fair Housing Act.

modification, and the paired testing methodology can be adapted for a wide variety of disabilities and housing circumstances.¹⁰

Persons with disabilities are effective testers. It is not necessary to have nondisabled testers pose as people with disabilities or as their proxies. Some testers with disabilities may require accommodation, including assistance in traveling to test sites or completing test reporting forms. In some cases, these accommodations can increase the costs of completing paired tests.

Organization of the Report

The remainder of this report begins by describing the project's exploratory phase, and then focuses on findings from the pilot phase.

Exploratory Phase. Chapter 2 describes the ten testing scenarios implemented in the exploratory phase, and briefly outlines key lessons from each, including challenges involved in targeting research tests to housing developed with Low-Income Housing Tax Credits and senior housing.

Pilot Phase. Chapter 3 describes the two testing scenarios implemented in the pilot phase of this research effort, as well as methods for sampling and analysis. Chapters 4 and 5 present findings from the project's pilot phase, focusing first on discrimination against renters who are deaf attempting to use TTY services to inquire about available homes and apartments, and then on discrimination against renters who use wheelchairs when they visit rental properties in person.

Chapter 6 provides a summary of findings from both phases of this research effort and their implications for both ongoing research and policy. Annex A provides a list of expert advisers to the Disability Discrimination Study; Annex B provides the forms used to authorize tests and make advance calls; and Annexes C and D provide all test reporting forms for telephone and in-person testing, respectively.

¹⁰ Of course, paired testing may not be well-suited for detecting and measuring all forms of discriminatory treatment that may occur in a housing transaction, or all types of disabilities.

2. LESSONS FROM THE EXPLORATORY TESTING PHASE

Testing for discrimination against persons with disabilities is particularly challenging because different types of disabilities call for different testing strategies and because of the potential importance of capturing not only differential treatment but also denial of reasonable accommodation or reasonable modification. In the first phase of this study, the Urban Institute explored the feasibility and effectiveness of multiple testing strategies targeted to different categories of persons with disabilities and focusing on different aspects of housing discrimination.

To help guide the development and design of these exploratory strategies, the Urban Institute convened a distinguished panel of expert advisors (see Annex A for a list of expert panel members). The panel met in Washington, D.C. for a day and a half at the outset of the project to discuss the challenges involved in testing for discrimination against persons with disabilities and to offer advice about possible testing strategies, what types of testing could be most effective, and how products from this study could be most useful to advocates and practitioners.

This chapter summarizes the protocols that were implemented in the exploratory phase, and discusses lessons learned about feasibility and challenges from a research perspective. These protocols and their lessons for enforcement testing are discussed in greater detail in the forthcoming guidebook of enforcement tools.

Testing for Discrimination Against Persons with Mental Disabilities

During the first phase of this project, we implemented three testing scenarios for measuring discrimination against persons with mental disabilities. Two of these scenarios involved testers with mental illness or cognitive disabilities, while one relied upon nondisabled testers calling on behalf of homeseekers with disabilities.¹¹ Some members of the expert advisory panel argued strongly against using nondisabled persons as proxies for persons with disabilities in any testing, on the principle that persons with disabilities are capable of participating effectively in research about the circumstances they face. Other members raised concerns, however, about the feasibility of recruiting sufficient numbers of testers with discernible developmental disabilities who could nonetheless pose effectively as homeseekers, and about the potentially damaging emotional impact that testing might have on persons with mental disabilities. Therefore, we used the exploratory phase of this project to experiment with

¹¹ A cognitive or developmental disability is indicated by below average intellectual functioning, combined with deficits in dealing with one or more activities of daily living. Mental illness is a psychiatric disorder that results in a disruption of a person's thinking, feelings, moods or ability to relate to others.

both approaches to testing for discrimination against persons with mental illness or developmental or cognitive disabilities.

Scenario: In-Person Testing with Persons with Mental Illness. The first scenario focused on differential treatment of individuals with mental illness seeking rental housing in the private market. One of the central challenges for this testing was how a tester would disclose the fact of his or her mental illness relatively early but in a credible way. The expert advisors generally agreed that most persons with mental illness would not disclose the fact, but that a scenario involving no recent rental history would provide a credible reason to do so. Therefore, in each of these tests, the tester with a disability visited a rental office in person, indicating that he or she had a mental illness, had just been released from a treatment facility, and therefore had no rental history or current landlord references. The nondisabled partner also indicated a lack of rental history for some credible reason, such as having just graduated from college or having been living abroad.

Four tests of this type were completed. Our experience with these tests indicates that it is indeed feasible to conduct in-person testing for discrimination against mentally ill homeseekers, and that persons with mental illness can serve effectively as testers. However, it is challenging to recruit mentally ill testers who can handle the assignment, and some mentally ill testers may need extra support and assistance, including assistance during the test. Specifically, in some of the exploratory tests, the mentally ill tester was accompanied by an individual who posed as a friend and helped the tester remember basic information about his housing needs and questions to ask the rental agent. This approach proved to be credible and effective, but it significantly raises the cost of testing, and might not always be feasible for testing conducted for enforcement purposes.¹² Moreover, our experience indicates that testers with mental illness may be more effective testers if they conduct tests relatively infrequently, allowing them to recover from the stress associated with each test visit.¹³ Therefore, in order to conduct a large number of tests for

When a tester with a mental illness told the housing provider that he did not have a rental history, he was told that he would be required to get a letter from the group home where he currently resides stating that they would be responsible for paying the rent if the tester failed to do so. The nondisabled tester, who also presented himself as not having a rental history, was not told about such a requirement. (Test #0515)

¹² This study shows that persons with disabilities are effective testers for testing that is designed for research (or measurement) purposes. When testing is intended for enforcement purposes, careful consideration should be given to whether a disabled or nondisabled tester will be able to reliably and credibly recall the test, sometimes years later, in an enforcement proceeding; withstand the scrutiny of litigation, including cross-examination in depositions and at trial; and whether the experience might undermine the tester's emotional and physical health.

¹³ Not all persons with mental illness will necessarily experience difficulty or stress serving as testers.

research purposes, it would probably be necessary to extend the testing over a relatively long period, unless a very large pool of testers could be recruited.

Scenario: In-Person Testing with Persons with Developmental or Cognitive Disabilities. The next scenario was similar to the first, but focused on differential treatment of individuals with developmental or cognitive disabilities. Again, the tester with a disability visited a rental office in person, indicating that he or she had been living in a group home and was looking to live on his or her own for the first time.¹⁴ The nondisabled tester would also indicate that he or she was looking for an apartment for the first time. Because of concerns about the ability of persons with developmental disabilities to complete test reporting forms, both testers were accompanied by a nondisabled person posing as a friend. This person did not ask or answer any questions of the rental agent, but was available to help the tester remember key questions to ask of the agent.

Five tests of this type were conducted in the exploratory phase. Like the tests involving persons with mental illness, these tests confirm the feasibility of using the paired testing methodology to detect discrimination against homeseekers with cognitive disabilities, and the capability of disabled persons to act as testers on their own behalf. As anticipated, we found that testers with cognitive disabilities needed some assistance during the test in order to remember what they needed to ask of the rental agent. This approach proved to be credible to housing providers, and enabled persons with cognitive disabilities to be effective testers, but, as discussed earlier, it substantially raises the cost of testing, and might not always be feasible for testing for enforcement purposes.¹⁵ In order to conduct enough tests of this type to yield rigorous statistical estimates, it would probably be necessary to extend the testing over a fairly long period, in order to give testers with disabilities ample time and flexibility.

Although both testers had appointments to meet with the housing provider, the nondisabled tester was assisted immediately upon arrival to the office; the disabled tester waited 40 minutes before someone assisted her. (Test #0816)

¹⁴ In these tests, the individuals selected as testers were identifiable (based on appearance and speech) as cognitively disabled.

¹⁵ This study shows that persons with disabilities are effective testers for testing that is designed for research (or measurement) purposes. When testing is intended for enforcement purposes, careful consideration should be given to whether a disabled or nondisabled tester will be able to reliably and credibly recall the test, sometimes years later, in an enforcement proceeding; withstand the scrutiny of litigation, including cross-examination in depositions and at trial; and whether the experience might undermine the tester's emotional and physical health.

Scenario: Telephone Testing Using Proxies for Persons with Developmental or Cognitive Disabilities. The third scenario for measuring discrimination against persons with mental disabilities also focused on differential treatment of homeseekers with developmental or cognitive disabilities. However, these tests were conducted by telephone instead of in person, and involved the use of nondisabled proxies representing disabled homeseekers. Specifically, a nondisabled person posing as the case-worker for a developmentally or cognitively disabled person would telephone a rental housing provider to inquire about housing availability for his or her client. In these tests, the nondisabled homeseeker was also represented by a family member calling on his or her behalf. For example, the caller might say “my brother will be moving here in a month, and I’m checking out possible apartments for him.”

Five tests of this type were completed during the exploratory phase. These tests proved to be quite simple and inexpensive to conduct, and were credible to housing providers. This approach represents a feasible strategy for addressing some of the challenges of working with testers who have mental disabilities. However, it loses some of the narrative power of conventional paired testing, and because it does not rely upon persons with disabilities to act as testers on their own behalf, it may be objectionable to some advocacy organizations.¹⁶

In 2 out of 5 tests, the proxy for the disabled person was told about fewer units than the proxy for the nondisabled person. In an additional test, the proxy for the disabled person was quoted a higher rent than the proxy for the nondisabled person. (Test #s 0616, 0722, 0706)

Testing for Discrimination Against Persons Who are Deaf or Hard of Hearing

The exploratory phase of this project implemented two testing scenarios that focused on discrimination against homeseekers who were deaf or hard of hearing.

Scenario: Telephone Testing with Persons Using TTY Services. The first scenario focused on differential treatment against persons who rely on TTY telephone services. Specifically, the deaf tester used a TTY telephone with a relay operator to call a rental agent to inquire about available units. The nondisabled tester made a comparable inquiry by telephone.

Seven tests of this type were completed in the exploratory phase, indicating that this approach is feasible and credible. Tests can be completed quite quickly and cost-effectively, and can span a very wide geographic area because they do not require testers to travel around the metropolitan area to meet with housing providers in person. Moreover, TTY systems

¹⁶ See the forthcoming *Guidance for Practitioners on Testing for Disability Discrimination in Housing* for a further discussion of the challenges involved in working with persons with developmental disabilities as testers.

provide the deaf testers with a verbatim report on each telephone call, providing an independent narrative of what occurred. Finally, the exploratory testing indicated that some rental agents were uncomfortable with the TTY calling process or even unwilling to accept these calls, suggesting that this approach to testing may disclose very substantial barriers to housing search for individuals who are deaf or hard of hearing.¹⁷

When a deaf tester called the housing provider using the TTY service, the call was answered by an answering machine. The relay operator left a message for the tester saying that he was interested in a two-bedroom apartment and asking the housing provider to call the tester back. The tester then asked the relay operator to call a second number that was listed in the advertisement. This time, the call was answered by a man. The tester typed, "good morning, my name is _____ and I am interested in the two-bedroom apartment. Is it available?" As he was typing this message, the relay operator was explaining to the housing provider that the call was being placed by a deaf person using a relay service. The housing provider then hung up. Because the relay operator wasn't sure if the housing provider had truly hung up or if the service had been disconnected, the tester asked her to call again and to explain that he is deaf and that he is calling about the apartment for rent. As the relay operator was typing this message to the housing provider, the housing provider said, "Hey, stop calling me, son of a bitch, will you?" and hung up again. (Test #1004)

Scenario: In-Person Testing with Deaf Persons. The next testing scenario was designed to capture both differential treatment against homeseekers who were deaf or hard of hearing and refusal to make reasonable accommodation. A deaf tester who also had difficulty speaking understandably would visit a rental office in person to inquire about available housing. He or she used notes to communicate with the landlord or rental agent. Following the standard rental housing inquiries, the deaf tester asked whether the landlord would install flashing lights for the doorbell and alarm bells. If the landlord indicated that this accommodation would not be provided, the tester asked if he or she could pay for the installation of the flashing lights.¹⁸ The nondisabled tester also visited in person, simply making the standard rental housing inquiries.

Six tests of this protocol were completed. We found this approach to be feasible and credible, providing an effective strategy for capturing both differential treatment of disabled

¹⁷ It is important to note that, while some housing providers were unwilling to accept TTY calls, many others providers did provide full service to TTY users, indicating that the system is not excessively time consuming or burdensome.

¹⁸ Courts have not definitively established whether the installation of flashing lights for doorbells and alarms should be classified as an accommodation (which the housing provider is required to provide) or a modification (which the housing provider must allow the tenant to provide). Therefore, on the advice of the expert advisors, our protocols call for the tester to ask first for the landlord to provide this service and then (if refused) to request permission to pay for it himself.

homeseekers and refusal to make a reasonable accommodation. However, deaf testers had difficulty gaining access to buildings with intercom systems. In addition, the note-writing process proved to be time consuming and awkward, both for housing providers and testers. Some testers had difficulty writing legible and understandable notes. An alternative approach that was not implemented in the exploratory phase, would be to send testers who are deaf or hard of hearing to meet with housing providers accompanied by a sign

The nondisabled tester was told that there were 10 two-bedroom and 15 one-bedroom units available. She was taken to see three different models—a two-bedroom, a one-bedroom, and a studio apartment. Even though she asked, the disabled tester was not told specifically how many units were available and was shown only one of the model units. When she asked if there was anything else available, she was told that this was the only model they had to show her. (Test #1005)

language interpreter. Although this would raise the cost of testing, it would eliminate differences in treatment that might be attributable to poor penmanship or the time-consuming nature of the note-writing process.¹⁹ Adding a sign language interpreter might add some additional complexities to a test, however, that need further exploration.

Testing for Discrimination Against Persons Who are Blind or Visually Impaired

Two in-person testing scenarios were implemented in the exploratory phase to capture discrimination against homeseekers who are blind or visually impaired.

Scenario: In-Person Testing with Blind Persons Using Guide Dogs. The first scenario focused on differential treatment and refusal to make reasonable accommodation for persons using assistance animals. A tester who was blind and accompanied by a guide dog visited a rental office in person to inquire about available housing. If a unit was available, the tester requested an accommodation—waiver of the “no pets” policy or of any special fees or restrictions on the presence of the dog. When rental agents were unsure or ambiguous about policies regarding service animals, testers made repeated call-backs until they received a definitive answer regarding this accommodation. The nondisabled tester also visited in person, making the standard rental housing inquiries, without any mention of a pet.

Eight tests were conducted using this protocol. This experience indicated that the approach is clearly feasible, and that it can effectively capture both differential treatment on the basis of disability and refusal to make a reasonable accommodation. However, this approach definitely requires follow-up inquiries to obtain a definitive answer about limitations or fees associated with the companion animal. Testers quite frequently received an uncertain or ambiguous response during their initial visits, and had to make repeated calls to get a final

¹⁹ One advantage of the note-writing approach, however, is that it may generate a written record of discriminatory comments.

answer. In addition, testers sometimes had difficulty finding the front door, using intercom or buzzer systems, and gaining access to rental properties or management offices; as a consequence they sometimes had to seek assistance from bystanders. Therefore, it might make sense to send testers to their assignments with someone who would provide transportation and will help them gain entrance, but who would not accompany them during the test.

The blind tester was clearly recognizable as a blind person—using both a cane and a guide dog. When he arrived for an appointment with a housing provider, he was assisted by a stranger on the street to access the building, but was stood up by the housing provider. He returned to the office of the local testing organization and called the housing provider to find out what happened. The housing provider told the tester that he had also been at the appointment site at the right time, but that because he saw that one of the men had a dog and dogs are not allowed, he did not answer the door. (Test #0128)

Scenario: In-Person Testing with Blind Persons but No Guide Dogs. The second scenario in this category also focused on both differential treatment and refusal to make reasonable accommodations, but eliminated the companion animal as a factor. Specifically, a tester who was blind or visually impaired visited a rental office in person to inquire about the availability of housing. At the end of the visit, he or she asked the agent to read the application form aloud so that he or she would know what information and documentation would be needed in order to complete an application. This approach was designed to test the willingness of rental agents to provide a reasonable accommodation *immediately*, as opposed to agreeing to provide one later.²⁰ The nondisabled tester also visited in person, making the standard rental housing inquiries.

Seven tests of this type were completed during the exploratory phase, proving it to be feasible and effective. As discussed above, testers who were blind sometimes had difficulty gaining access to rental offices. In addition, some housing providers summarized or paraphrased the application form rather than reading it verbatim, raising some question about what constitutes a reasonable accommodation in this regard.

A disabled tester who asked for the reasonable accommodation of having the housing provider read the application form was told, "no, you go home and fill out the application and call back." (Test #0525)

²⁰ If written application forms were not used by a sampled housing provider, testers simply asked for a list of what information and documentation they would need to provide, and no data on reasonable accommodation were recorded.

Testing for Discrimination Against Persons with Mobility Impairments

Testing for discrimination against persons with mobility impairments is more complex and challenging than one might at first think, because the accessibility of rental properties varies (depending in part upon structure type and when they were built), and because the kinds of modifications a disabled homeseeker might reasonably request depends upon the characteristics of the property and the unit. We implemented two exploratory testing scenarios designed to capture different forms of discrimination against persons with mobility impairments who are seeking housing in the rental market.

Scenario: In-Person Testing with Persons Using Wheelchairs. The first scenario involved in-person testing by individuals using wheelchairs, in order to capture both differential treatment and refusal to permit reasonable unit modifications. These tests targeted rental housing available in the conventional, private market, some of which is accessible or could reasonably be made accessible, and some of which cannot reasonably be made accessible. HUD established at the outset that this project is not intended to test for compliance with accessible design and construction standards. Instead, its focus is on discrimination against individual disabled homeseekers inquiring about the availability of rental units and the reasonable accommodations or modifications they need.

When a disabled tester asked if he could install a ramp into the unit, he was told by the housing provider that if he were a current tenant and he had an accident that subsequently required a ramp, then they would be required to put one in, but otherwise he could not install a ramp. The tester was then told that he would have to be put on a waiting list for a more accessible unit. (Test #0931)

Therefore, this testing scenario required the local testing coordinator to make a preliminary reconnaissance of each sampled property to determine whether the building was visitable or could reasonably be made accessible.²¹ If it was not, no test was conducted. For properties that appeared at this reconnaissance stage to be accessible, the nondisabled tester would visit first, making the standard rental housing inquiries, but also recording information about any modifications that might be needed to make the building or unit fully accessible. Based upon this information, the test coordinator determined what modification the tester with a disability should request in his or her visit.

Seven tests of this type were conducted in the exploratory phase, establishing that it is feasible to test for both differential treatment and unwillingness to allow reasonable

²¹ This reconnaissance focused on the visitability of the rental office and dwelling units, and used criteria consistent with the design and construction requirements of the Fair Housing Act in making the determination of whether the building was accessible. However, this study did not make any formal determination as to whether or not the building was covered under the design and construction requirements of the Fair Housing Act.

modifications. However, nondisabled testers were not always able to accurately or consistently identify modification needs in their test visits. In some cases, this was because they were not shown the same unit as their nondisabled partners. Therefore, it may make more sense to develop a list of reasonable modifications in advance of the testing process, and train testers with disabilities to request the first relevant modification on the list, based on their assessment of the property and the unit. In addition, testers using wheelchairs sometimes had difficulty traveling around the metropolitan area to widely dispersed test locations.

Scenario: Non-Paired Telephone Testing to Request a Reasonable Accommodation. The second testing scenario in this category focused on the willingness of rental housing providers to make reasonable parking accommodations for persons with mobility impairments. This scenario was non-paired, and therefore did not capture differential treatment. Instead, a disabled person telephoned a rental office to inquire about available units and indicated that, due to a mobility impairment, he or she would need a designated accessible parking space near the rental unit. Depending upon the outcome of this initial call, the tester would follow up with up to two *additional* phone calls as needed, trying to obtain a commitment on this accommodation. More specifically, testers made the additional phone contacts until they received an unambiguously positive or negative response to a three-part request: 1) can I have a parking space? 2) is the parking space reasonably close to my unit? and 3) will the parking space be designated for my exclusive use?

Seven tests of this type were completed, establishing it as a very inexpensive approach for assessing the willingness of housing providers to make reasonable accommodations for persons with mobility impairments. In some cases, however, there was ambiguity about whether the parking space would be officially designated as an “accessible” space, or whether it would simply be designated for the exclusive use of the resident. Moreover, because this approach is unpaired, it provides no information about differential treatment of persons with disabilities. However, in research tests, requests of this type regarding parking accommodation can be combined with the in-person, paired test scenario described above.

When the tester with a physical disability called the housing provider to ask about a parking accommodation, the housing provider said she had to check with the manager. However, she did say that "handicapped parking spaces were not specifically designated to individual tenants and were available on a first-come first-served basis." She also told the tester that he could rent a covered parking space for \$15 per month in order to guarantee a designated parking space near the apartment. (Test #0518)

Adapting Testing Strategies to Different Market Segments

In previous research projects that have tested for discrimination in the private housing market, the Urban Institute has used a carefully designed sampling methodology to draw a

representative sample of housing units or providers. Our standard methodology has been to define the universe from which the sample would be drawn, including or excluding particular categories of housing, to construct a listing of all units or providers in this universe, and then to draw a random sample so that every unit in the defined universe had a known chance of appearing in the sample.

For most of the testing conducted during the exploratory phase of this project, the universe for testing was defined as housing units advertised as available for rent, excluding luxury rentals, publicly subsidized properties, and units restricted to elderly tenants.²² It included all other rental units (within specified geographic areas) advertised in one or more publicly available source. With these boundaries on the universe, representative samples were drawn from the classified advertisements of major metropolitan newspapers, community newspapers, and apartment and real estate guides.

In addition, we experimented with adaptations to this sampling methodology to include two additional segments of the rental housing market—senior housing and properties subsidized under the Low-Income Housing Tax Credit (LIHTC) program. Specifically, we targeted wheelchair tests to senior rental housing developments, and a small number of the wheelchair, deaf, and blind protocols to LIHTC properties. Testing in both of these market segments proved feasible, but raised significant sampling issues from the perspective of large-scale research testing.

Scenario: In-Person Testing in Senior Housing. Elderly people make up roughly half of the mobility-impaired, blind/low vision, and deaf/hard-of-hearing populations. Targeting testing to elderly-only rental developments would make it possible to determine whether elderly disabled renters face discrimination when they apply to live in these developments, compared to the nondisabled elderly. Therefore, one exploratory testing strategy focused exclusively on elderly-only rental housing developments, and tested for differential treatment against homeseekers using wheelchairs. We anticipated that all elderly housing developments would be structurally accessible to persons with mobility impairments. An elderly tester using a wheelchair visited sampled developments in person to inquire about available housing. A nondisabled tester in the same age range also visited in person, making the same standard rental housing inquiries.

²² Luxury units are typically excluded from paired testing studies both because they are atypical of the conventional housing market and because it may be difficult for testers to pose as sufficiently affluent to be credible, raising the risks of disclosure. Subsidized properties are generally excluded because they are likely to have waiting lists, complex application procedures, and specialized eligibility requirements. Properties restricted to elderly tenants are generally excluded because definitions of elderly may vary and because these properties may impose additional screening criteria, such as health assessments.

Two tests of this type were conducted in the exploratory phase. This approach is clearly feasible, but creating a sufficiently large sample of elderly-only rental housing developments proved to be a challenge from a research testing perspective. A sample of potential developments was drawn from an expansive Internet search of elderly housing sites, including: marketfinder.com, forrent.com, homestore.com, seniorresidences.com, and retirementhomes.com.²³ Many rental developments targeted to seniors offer “assisted living” or “continuing care” services in conjunction with housing, and therefore require information about an applicant’s health care needs as well as housing needs. Testing for discrimination in these circumstances would require new approaches and protocols. However, it appears that a larger number of developments may offer housing for elderly homeowners, and may represent a feasible target for future testing for discrimination on the basis of disabilities.

Scenario: Testing in Low-Income Housing Tax Credit Developments. Because a substantial proportion of persons with disabilities have low- to moderate-incomes, there is strong interest in testing rental properties that receive housing subsidies. Therefore, the exploratory phase of this project targeted a small number of tests to housing developed under the federal Low-Income Housing Tax Credit (LIHTC) program. Specifically, two tests for discrimination against blind persons (with guide dogs), two TTY tests, two in-person tests for discrimination against deaf persons, and four wheelchair tests were completed for LIHTC developments. Samples of potential developments were drawn from HUD’s LIHTC database and from listings provided by the New Mexico Mortgage Finance Authority and the Illinois Housing Development Authority. Testing protocols were modified slightly so that testers were not asking for units that were immediately available, but were inquiring about the length of the waiting list and what types of units might be available now or within the next three to six months.

This experience indicates that, although testing LIHTC properties may well be feasible for enforcement or investigatory purposes, assembling a sufficiently large, reliable, and comprehensive sample of LIHTC properties to support rigorous research testing represents a significant challenge. Existing lists of LIHTC properties include many non-working telephone numbers. Advance calls to these properties sometimes indicated that managers did not know (or could not explain) what kind of subsidized housing they had or what eligibility requirements would apply. In addition, some properties do not accept in-person applications or inquiries and will not discuss availability until the application process has been completed and eligibility has been determined.

²³ Note that we did not include subsidized housing for seniors, which might have increased the pool of potential properties, but would have raised other issues regarding waiting lists and eligibility criteria.

3. PILOT DESIGN AND METHODOLOGY

Although the paired testing methodology originated as a tool for fair housing enforcement, it has been adapted successfully for research purposes. In order to yield reliable measures of differential treatment in housing market transactions, paired testing must be applied to a representative sample of housing providers or available housing units in selected markets, and must adhere to highly standardized protocols. This Disability Discrimination Study (DDS) builds upon the experience from the Housing Discrimination Study 2000 (HDS2000) to enhance and extend the paired testing methodology, producing metropolitan-level estimates of discrimination against persons with disabilities for the Chicago region. This chapter describes the sampling procedures, testing protocols, and analysis techniques implemented in the second (pilot) phase of DDS.

Sufficient resources were available for this project to conduct large-scale testing for two of the scenarios from the exploratory phase. Based on findings from the exploratory testing, HUD staff determined that Stage 1 of the pilot phase should focus on persons who were deaf and used TTY systems to inquire about available rental housing throughout the Chicago metropolitan area. This approach was selected because of its low cost and evidence from the exploratory phase suggesting a very high level of differential treatment. HUD determined that Stage 2 of the pilot phase would focus on persons who had physical disabilities and used wheelchairs to visit advertised rental properties in the City of Chicago and surrounding Cook County. This approach was selected because housing providers could readily recognize that a tester had a disability, and because it was possible to establish clear protocols for requesting both reasonable modification and reasonable accommodation. Staff of Access Living of Metropolitan Chicago worked in partnership with the Urban Institute to design, plan, and conduct both phases of pilot testing. Approximately 100 paired tests were conducted for each disability type.

Sampling

Because the study goal was to observe and measure rental agent behavior, we needed a representative sample of rental agents, where an agent's probability of selection reflects his or her share of available housing units. In addition, our sampling methodology needed to provide information about the housing being offered by each agent so that both members of a testing team could be assigned characteristics (such as household size and income) and preferences

(such as housing type and location) that corresponded to housing that an agent actually had to offer.²⁴

The DDS paired testing methodology builds upon the testing methodology developed and implemented in the HDS2000. National paired testing studies conducted prior to HDS2000 have all relied upon classified advertisements in major metropolitan newspapers to generate samples of rental and sales agents. The Housing Market Practices Study (HMPS, conducted in the late 1970s) drew a single sample of advertisements from the Sunday classified section of each metropolitan area's primary newspaper. Tester teams were assigned characteristics and preferences consistent with the sampled housing units and visited the corresponding agents, inquiring generally about available housing. In the 1989 Housing Discrimination Study (HDS), this methodology was refined to involve weekly samples of available housing units, again drawn from the classified advertising sections of each metropolitan area's major newspaper. This refinement allowed testers to begin each visit by inquiring about a particular housing unit, making the tests more credible and allowing both white and minority testers to send agents the same implicit signals about housing preferences. Phase I of HDS2000 replicated this approach, drawing weekly samples of advertisements from the Sunday classified section of each metropolitan area's major newspaper.²⁵

However, relying solely upon metropolitan newspapers to represent the housing market as a whole has significant limitations and drawbacks. Therefore, Phase II of HDS2000 developed procedures for drawing on multiple advertising sources in order to reflect more fully the universe of housing units available for rent in the sampled metropolitan areas. These procedures were applied again in Phase III. Since the primary goal of DDS was to measure the incidence of differential treatment in the Chicago Metropolitan rental market, DDS followed the same sampling procedures for rental tests as Phases II and III of HDS2000.

In general, the weekly ad-sampling methodology offers several important benefits. It yields a representative sample of housing agents who use publicly available sources to advertise available units, where an agent's probability of selection is proportionate to his or her share of all units advertised in this way. Because the advertising sources are readily available to those seeking rental housing, this sampling frame includes agents who can realistically be accessed by any homeseeker. In addition, the weekly sampling methodology provides a consistent and credible starting point for each test, tying the characteristics and preferences of testers to housing actually available from the sampled agent and sending consistent signals

²⁴ For a more detailed discussion of sampling principles, see chapter 2 of *Research Design and Analysis Plan for Housing Discrimination Study 2000*, The Urban Institute, March 2000.

²⁵ In addition, Phase I of HDS2000 experimented with alternative methods for identifying and sampling available units.

from both members of a tester team. Finally, this methodology addresses one of the major ethical concerns about paired testing—that it imposes an unreasonable cost burden on housing agents, who have to spend time responding to testers’ inquiries, and potentially violates their expectations of privacy regarding these inquiries. By advertising in a widely available outlet, a housing agent is explicitly inviting inquiries from the general public.

Four basic steps were required to produce the DDS ad samples:

- Selecting a set of advertising sources that provided reasonably complete coverage for the metropolitan housing market;
- Developing a schedule for rotating among sources on a weekly basis;
- Establishing an efficient sampling protocol for each advertising source; and
- Drawing weekly ad samples.

Although the sampling process was basically the same for both test types, we had to make two changes for the wheelchair testing. First, due to the lack of public transportation for wheelchair users in the outer portions of the Chicago Metropolitan Area and the prohibitive costs associated with providing private transportation, the sample of advertisements used for wheelchair testing was limited to properties in the City of Chicago and Cook County. Second, the Chicago area rental housing stock, especially in the city itself, includes many older, walk-up apartment buildings. Some advertising sources included a large number of these older units, which were inaccessible to testers who use wheelchairs even to visit and, therefore, ineligible for our testing. Consequently, to ensure that each week’s sample included a sufficient number of eligible units, we adjusted the rotation schedule to include sources that featured newer rental properties in every week.

Selecting advertising sources. We assembled an inventory of potential advertising sources for the Chicago Metropolitan Area. Drawing from media directories, the Internet, and local informants, we prepared a list of newspapers, Internet sites, and guides that area housing agents use to advertise rental units. Excluded from this inventory were foreign language sources, sources with very small circulation or ad volume, sources produced by a single rental company, sources requiring the user to specify housing preferences in order to obtain listings, and sources not readily available to the general public. Based upon this inventory, we selected a set of sources that provided reasonably complete coverage of rental advertisements for the metropolitan housing market as a whole. Two major metropolitan dailies were included among the selected sources. City and suburban community papers that provided a reasonable volume of advertisements for specific geographic sub-areas were included. No Internet sources were included because local informants indicated that they were not widely utilized and did not offer a significantly different (or larger) selection of advertisements than published sources. Finally, we

included free apartment guides that were available locally. Table 3-1 identifies the actual sources selected for the Chicago Metropolitan Area.²⁶

Table 3-1: Sources of Rental Housing Advertisements

Major Metropolitan Newspapers	Community Papers	Rental Guides
Chicago Tribune Chicago Sun Times	Pioneer Press Chicago Reader Daily Southtown Daily Herald	Apartment Guide Apartments for Rent

Developing a rotational schedule. Once a reasonable set of advertising sources was selected for the Chicago Metropolitan Area, we developed a schedule for rotating among sources on a weekly basis. Our goals in developing this schedule were to minimize the overlap between sources that might be used in the same week, to sample on the most appropriate day of the week for each source, and to ensure an adequate number of advertisements from which to sample each week. The goal for the sampling schedule was to rotate the schedule equally among different source types and geographic areas. For example, a source that covered all or most of a metropolitan area (such as a major metropolitan newspaper) would be the only source utilized in a given week. However, several sources that targeted different geographic sub-areas might be combined in the same week. Finally, sources that were published monthly rather than daily or weekly, would generally be utilized during the weeks when they are first released.²⁷ During the wheelchair tests, the sampling schedule had to be adjusted because of a large portion of ineligible units. Since advertising sources often contain similar types of units (for example, small owner, older walk-up buildings, larger complexes), when we used the sources as they appeared in the original rotation, we ended up not having a large enough sample for

²⁶ Although the TTY tests included sites in the entire metropolitan area, and the wheelchair tests only included sites in Cook County, Illinois, we used the same sources for both types of test. We eliminated the sites that fell out of the Cook County Area during the sampling process for the wheelchair tests.

²⁷ During the TTY tests, we had to adjust this schedule slightly in order to get a large enough sample from our sources.

testing.²⁸ We therefore adjusted the rotation, often adding a major metropolitan paper as a secondary source.²⁹ Table 3-2 provides an illustrative example of a typical rotational schedule.

Table 3-2: Rotating Across Sampling Sources

WEEK	TTY TESTS	WHEELCHAIR TESTS
1	Chicago Tribune	Chicago Tribune
2	Community newspaper and monthly apartment-seekers guide	Community newspaper and monthly apartment-seekers guide
3	Chicago Reader	Chicago Reader, supplemented with Chicago Tribune
4	Community newspaper and monthly apartment-seekers guide	Community Newspaper, supplemented with Chicago Tribune
5	Community newspaper and Chicago Sun Times	Community newspaper and Chicago Sun Times

Establishing sampling protocols. For each advertising source, we implemented a systematic sampling protocol, where we used randomly generated numbers to sample every “nth” ad in order to yield the target sample size. Not all advertised housing units were eligible for inclusion in our sample. Some types of ads were not suitable for our paired testing protocols. For example, subsidized rental housing units had to be excluded, because they impose income and other eligibility criteria for tenants. Additionally, during the wheelchair testing stage, we found that many advertised units were ineligible because the tester who used a wheelchair could not get into the building. DDS sampling protocols made a number of changes to the eligibility criteria used in Phase III of HDS2000. A list of ineligible housing types is provided on the Advance Call Form in Annex B:

- Rental units in small (fewer than four units), owner-occupied buildings and single-family homes were *excluded* because they potentially would not be covered under the Fair Housing Act;

²⁸ See Chapter 5 for a description of the limited availability of accessible rental housing units.

²⁹ The secondary source was used when the original sample did not have enough eligible ads to complete the designated number of weekly tests.

- Housing providers who had already been contacted, either through an advance call or actual testing, were excluded for detection reasons; and
- Units located in buildings with a rental office that was not accessible to persons using a wheelchair were excluded.

Drawing weekly samples. During both stages of testing, we drew ad samples on a weekly basis, applying the rotational schedule and sampling protocols outlined above. The weekly samples were two to three times larger than the target number of tests to be conducted in a given week, in part because some advertisements that appeared to be eligible for inclusion in the sample turned out to be ineligible when further information is gathered on site, and in part because some advertised housing units were no longer available by the time testers called to schedule a visit. To the greatest extent possible, we combined ad sources, so that the ad volume was roughly equal from week to week, making the sampling rates from each source approximately the same.

Although specific sampling protocols varied by source of advertisements, the basic process consisted of the following six steps:

- Prepare the sampling frame, removing pages that do not include any eligible ads;
- Apply the sampling protocol developed for the site and ad source to randomly select the target number of advertisements;
- Verify the eligibility of each advertisement as it is selected for inclusion in the sample;
- Record all the information from the advertisement for transmission to the local testing organization;
- Randomize the sequence of advertisements in the sample, so that the order in which ads are used to initiate tests does not correspond to the order in which they appear in the ad source or the order in which they were drawn into the sample; and
- Transmit the sample to the local testing organization.³⁰

The testing organization received one rental sample each week, though not always on the same day each week. If a sample proved to be insufficient for a particular site in a given week (i.e., included many ineligibles), additional sample units were drawn from the same advertising source and sent to the testing organization.

³⁰ As discussed further below, Phase II of HDS2000 developed a web-based data entry system for transmitting and managing data. Therefore, ad sampling information was entered into this system by Urban Institute staff and immediately became available to local testing coordinators on a secure web site. See the Test Authorization Form in Annex B.

Field Implementation and Paired Testing Protocols

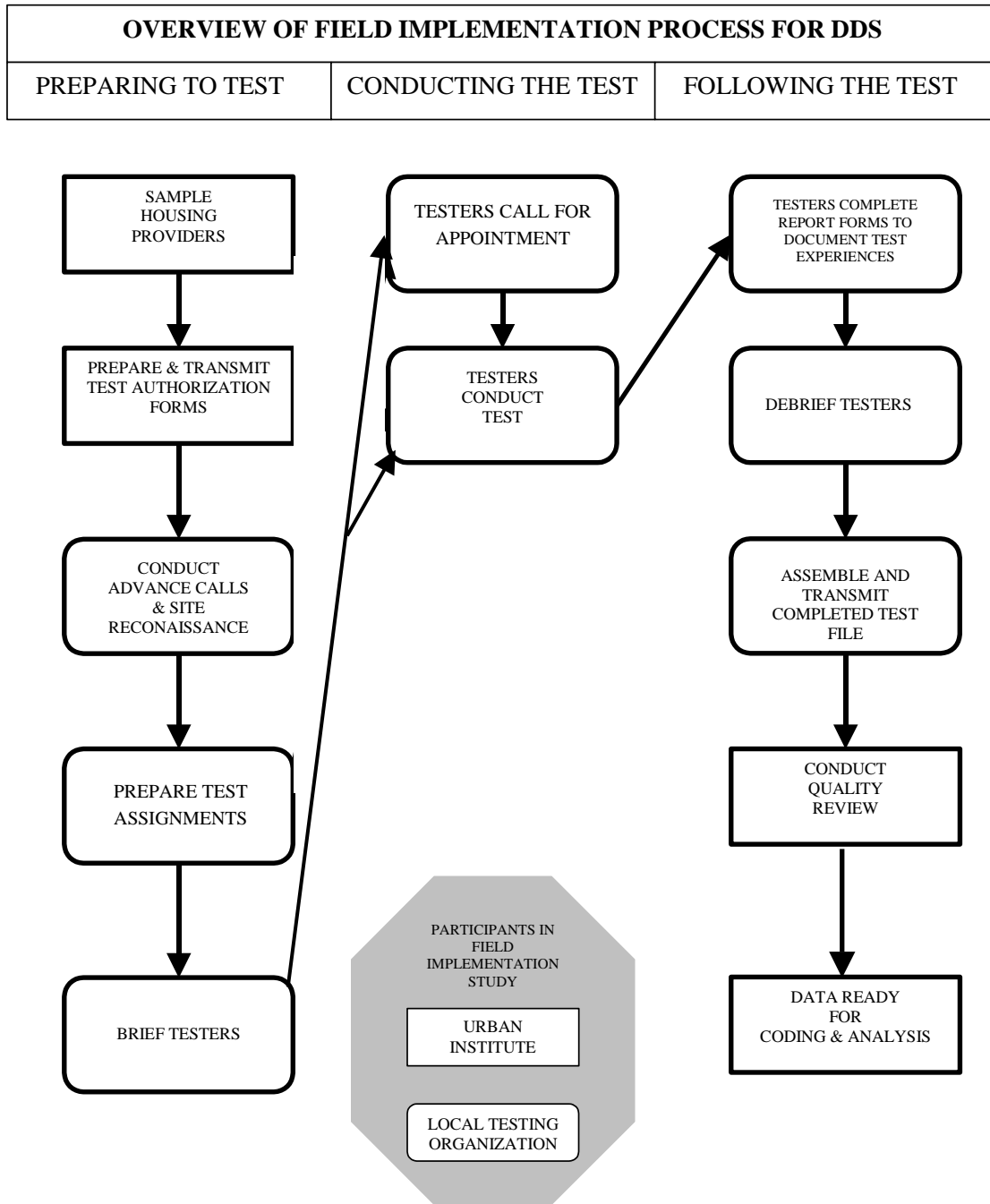
DDS implementation was managed by Urban Institute staff who subcontracted with Access Living, a local fair housing testing agency, whose staff were responsible for the day-to-day testing activities, directing testers and ensuring that tests were completed according to established procedures and protocols. A web-based data entry and data sharing system—the Central On-Line Database (CODE)—was used to transmit ad samples, assign tester characteristics, and record test results. This section describes the field guidelines and procedures implemented in DDS. Because the TTY tests were conducted over the telephone and the wheelchair tests were in-person, there were several differences in the protocols for the two test types. The following sections describe the testing protocols, and the differences in the protocols for the two test types. Figure 3-1 provides a graphic overview of the field implementation procedures for DDS.

Preparing to Test. For each advertised housing unit selected for testing, Urban Institute staff prepared a Test Authorization Form (TAF), which was transmitted to the local testing organization via the CODE system. A unique control number identified each test, and the TAF specified the parameters of the test structure:

- Testing Type – deaf by telephone or wheelchair in person;
- Required Sequence – the randomly assigned order in which members of each tester team should make their test visits;
- Rental Information – the type of housing (furnished or unfurnished); and
- Ad Information – the information from the newspaper advertisement (name of paper, edition, location of ad), including ad copy.

The local testing organization was required to use the TAFs received each week in the order of the control number. Advance calls were made on all TAFs, both to confirm the eligibility of the advertised units and to obtain information needed to make credible test assignments. Advance callers were instructed to obtain specific pieces of information about every advertised unit, such as the exact date of availability, rent price, number of bedrooms, and the address of

Figure 3-1: Field Implementation Overview



the unit. If the advertised unit was no longer available, the advance caller inquired about other units that might be coming available. In order to facilitate the test visits, the advance caller also asked about office hours and whether or not an appointment was needed to view the housing or speak with a housing provider for in-person visits.³¹

Wheelchair tests also required the local organization to conduct site reconnaissance in order to assess building accessibility. Specifically, after advance calls had been completed, staff drove by potential test sites to determine whether there were obvious insurmountable barriers to access for persons using wheelchairs. For example, properties where the building entrance or rental office was only accessible by stairs were deemed ineligible for testing.

Personal, household and financial characteristics, along with a detailed set of instructions, were provided to each tester prior to conducting a test.³² Responsibility for developing tester characteristics was shared by the Urban Institute and the Access Living Test Coordinators. Test Coordinators developed the tester's personal information, such as their current employer and current housing situation, sometimes using the tester's real characteristics, if appropriate. Urban Institute staff provided extensive training to Test Coordinators on how to assign personal characteristics to testers (e.g., employers and occupations to avoid). Test Coordinators also determined other test characteristics, such as number of bedrooms to request, using information obtained during the advance phone call. Financial characteristics assigned to testers and housing requests to be made by testers were either assigned by the Test Coordinator or automatically assigned by the CODE system, based on the characteristics of the advertised housing unit to be tested:

- minimum number of bedrooms acceptable for the household;
- area or geographic preference;
- reason for moving;
- monthly and annual income;
- length of time on the job; and
- length of time at current residence.

³¹ Advance callers were required to make at least five attempts to reach a housing provider (calling at different times of the day on different days) before a unit could be deemed ineligible. See Annex B for test authorization and advance call forms.

³² For in-person tests, each tester was provided with only one test assignment at a time and was required to complete that test before receiving another test assignment. During TTY tests, testers were provided with more than one test assignment at a time. See Annexes C and D for all test assignment and reporting forms for the telephone and in-person tests, respectively.

Test Coordinators were required to meet with each tester, individually and in person, prior to a test being conducted. During this initial briefing, the Test Coordinator was responsible for reviewing the test assignment form with the tester and answering any questions about assigned characteristics; for providing the tester with the appropriate test forms and materials; and for reviewing procedures for conducting the test and completing the test report forms. In addition, testers were provided with a detailed set of instructions for every test assignment. These instructions specified the standard set of tasks testers were expected to accomplish during their test, including how to approach the test site, what questions to ask, and how to end the visit. Annexes C and D provide examples of the Test Assignment Forms, other forms, and detailed instructions provided to testers.

Conducting the Test. During both stages of testing, testers were trained to inquire about the availability of the advertised housing unit that prompted their phone call or visit, similar units (same size and price) that might be available, and other units that might meet their housing needs. For in-person tests (involving persons using wheelchairs), testers also asked to inspect all available units, and the tester using a wheelchair asked for a unit modification and parking accommodation (if the development had on-site parking).³³ If asked by the housing provider, testers provided information about their (assigned) household composition, financial characteristics, employment, and housing needs. Testers were trained not to express any preferences for particular amenities or geographic locations, and they did not submit formal applications, agree to credit checks, or make offers to rent available units. They also did not request application forms, leases, or other documents, but were to accept them if offered by the housing provider. In conjunction with these basic testing protocols, testers were also trained to be convincing in the role of an ordinary homeseeker, obtain as much information as possible from the housing provider about available housing, and take notes in order to remember key information about what occurred during the test and what information was provided by the housing provider.

For the exploratory phase of DDS, deaf testers used a traditional TTY relay system to conduct their tests. During the pilot phone tests, however, testers were able to use Nextalk, a computer based relay operator phone system that was accessible to most testers at home and at the offices of the local testing organization. Both systems are routinely used by people with communication disabilities in order to make telephone calls. The deaf tester typed a message to the housing provider using a TTY (teletypewriter) or, in the case of Nextalk, a computer keyboard. A relay operator received the message as printed words on the TTY system. The operator then called the housing provider by phone, explaining the relay process, and reading

³³ The TTY test protocols did not include any request for reasonable accommodation because we concluded that it would not be credible to make such a request before a customer had even seen the rental property.

the tester's typed message (as the tester's side of the conversation) to the housing provider. As the housing provider responded verbally, the operator typed the response back to the deaf tester. The deaf tester received the message and typed his or her response. A record of the conversation was generated automatically and incorporated into the test report form as a complete narrative of the call. The nondisabled tester made a comparable inquiry by telephone.

For the in-person wheelchair tests, appointment calls were sometimes required before a tester could conduct the on-site visit. While the standard approach for most tests was for the tester to "drop in" rather than make an appointment, appointment calls were required when the sampled advertisement did not provide the location of the available housing, when the advertisement indicated that an appointment was required, or when the advance call indicated that an appointment was required. Testers were instructed to mention the advertised unit during this call, and were instructed to keep the call short in order not to exchange personal or financial information prior to the actual test. If an agent was reluctant to make an appointment with the tester, perhaps stating that there were regular office hours, the tester could specify with the agent what time he or she planned to arrive during those hours in lieu of an actual appointment.

Reasonable Modification and Accommodation. At the end of an in-person visit, each tester with a disability was required to ask for a unit modification if he or she was told about an available housing unit.³⁴ Specifically, we developed an ordered list of reasonable modifications in advance of the testing process and trained testers to request the *first relevant* modification on the list, based on an assessment of the property and the unit. All of the modifications included on the list were reasonable³⁵ and testers were trained to tell housing providers that they would pay. These modifications included the following:

- 1) Modify unit entry-way - widen the doorway, remove the threshold, install a ramp, or reverse swing of door;
- 2) Modify the bathroom - widen doorway, remove cabinets under sink, or install grab bars around toilet;
- 3) Modify switches - lower thermostat controls or light switches; and
- 4) Modify door handles - change doorknobs to levers.

³⁴ In the pilot phase, the order of tester visits was randomized; in half the tests the disabled tester visited first while in the other half, the nondisabled tester visited first.

³⁵ There may be some circumstances in which widening a door involves a load bearing wall, and therefore may not be feasible.

If a rental site had on-site parking, the tester with a disability also asked for an accommodation at the end of the visit. Specifically, testers were to ask if they could have an accessible parking space near the available unit or building entrance that could be designated for their exclusive use. The tester then recorded the comments made by the housing provider in response to this request. If the housing provider did not know the answer and had to ask someone else regarding the request for unit modification or parking accommodation, the tester was required to make one or more follow-up phone calls within a week in an effort to get a definitive answer.

Following the Test. Following every test, each tester was required to complete a set of standardized reporting forms on the CODE system (provided in Annexes C and D).³⁶ Test partners did *not* compare their experiences with one another or record any conclusions about differences in treatment; each simply recorded the details of the treatment he or she experienced as an individual homeseeker. The site visit report forms record observations made by the tester and information provided by the housing provider. In addition, some testers were required to complete a narrative of their test. The test narrative provided a detailed, chronological accounting of the test experience. Testers did not know prior to their conducting a test if a narrative would be required; this served both to ensure that testers were conducting all tests with equal attention to established protocols and procedures, including taking notes, and to ensure against fabrication of tests. For the telephone tests, deaf testers were not required to complete a narrative because a complete record of their conversation with the housing provider had already been generated through the TTY system. However, 50 percent of their nondisabled partners were required to complete a narrative (the selection of who had to complete a narrative was randomly generated through the test authorization process). Because the in-person testing was more complicated, all testers had to complete a test narrative.

After completing each test, testers were instructed to contact their Test Coordinator in order to arrange for an in-person debriefing. At the debriefing, the Test Coordinator was responsible for collecting all of the completed test forms, as well as any notes or other materials obtained by the tester; reviewing the forms to make sure they were filled out completely; and discussing any concerns the tester may have had about the test or any deviations they may have made from the test assignment or instructions. Some visits to rental agencies resulted in follow-up contact, initiated either by the housing provider or the tester. Provider-initiated

³⁶ As in the Housing Discrimination Study, DDS used the CODE system to generate and send TAFs to the local testing organization. The web-based CODE system also provided an efficient way for Test Coordinators to develop tester assignments and for all project staff to monitor testing activities. Among the advantages of web-based data entry, the CODE system performed basic checks for data completeness and consistency as the data were entered, and made test reports immediately available for quality control review by the local testing organization and Urban Institute project staff.

contacts were monitored systematically and recorded through a voicemail account set up for each tester. All follow-up contacts (including mail as well as telephone calls, and follow-up initiated by testers to obtain answers regarding reasonable modifications or parking accommodations) were recorded on a Follow-Up Contact Form, which documented when the follow-up was received, who initiated it, and the nature of the follow-up.

Using Paired Tests to Measure Discrimination

Data from a sample of standardized and consistent paired tests can be combined and analyzed to measure the incidence and forms of discrimination in urban housing markets. The remainder of this chapter describes the statistical techniques used to analyze data from DDS testing. Specifically, we discuss basic measures of adverse treatment, the challenge of distinguishing systematic discrimination from random differences in treatment, rental treatment indicators, and tests of statistical significance.

Gross and Net Measures. A paired test can result in any one of three basic outcomes for each measure of treatment: 1) the nondisabled tester is favored over the tester with a disability; 2) the tester with a disability is favored over the nondisabled tester; or 3) both testers receive the same treatment. The simplest measure of adverse treatment is the share of all tests in which the nondisabled tester is favored over the tester with a disability. This *gross incidence* approach provides very simple and understandable indicators of how often people without disabilities are treated more favorably than equally qualified people with disabilities. However, there are a few instances in which testers with disabilities receive better treatment than their nondisabled partners. Therefore, we report both the gross incidence of nondisabled-favored treatment and the gross incidence of disabled-favored treatment.

Although these simple *gross measures* are straightforward and easily understandable, they may overstate the frequency of systematic discrimination.³⁷ Specifically, adverse treatment may occur during a test not only because of differences in disability status, but also because of random differences between the circumstances of their visits to the rental housing providers. For example, in the time between two testers' visits, an apartment might have been rented, the agent may have been distracted by personal matters and forgotten about an available unit, or one member of a tester pair might meet with an agent who is unaware of some available units.

³⁷ We use the term "systematic discrimination" to mean differences in treatment that are attributable to a customer's disability status, rather than to any other differences in tester characteristics or test circumstances. This term is not the same as "intentional" discrimination, nor is it intended to mean that these differences would necessarily be ruled as violations of federal fair housing law.

Gross measures of nondisabled-favored and disabled-favored treatment include some random factors and therefore provide *upper-bound estimates* of systematic discrimination.³⁸

One strategy for estimating systematic discrimination (that is, to remove the cases where non-discriminatory random events are responsible for differences in treatment) is to subtract the incidence of disabled-favored treatment from the incidence of nondisabled-favored treatment to produce a *net measure*. This approach essentially assumes that all cases of disabled-favored treatment are attributable to random factors—that systematic discrimination never favors persons with disabilities—and that random nondisabled-favored treatment occurs just as frequently as random disabled-favored treatment. Based on these assumptions, the net measure subtracts differences due to random factors from the total incidence of nondisabled-favored treatment.

However, it seems unlikely that all nondisabled-favored treatment is the result of random factors; sometimes persons with disabilities may be systematically favored on the basis of their disability. For example, a landlord might think that a young person with a disability may not socialize as much as a young nondisabled person and, therefore, might be a quieter tenant. The net measure subtracts not only random differences, but also some systematic differences, and therefore probably understates the frequency of systematic discrimination. Thus, net measures provide *lower-bound estimates* of systematic discrimination, and they reflect the extent to which the differential treatment that occurs (some systematically and some randomly) is more likely to favor nondisabled people over people with disabilities.

In the analysis presented here, gross incidence measures are reported for both nondisabled-favored and disabled-favored treatment. When these two gross measures are significantly different from one another, we conclude that a systematic pattern of differential treatment based on disability status has occurred. If, on the other hand, the incidence of disabled-favored treatment is essentially the same as the incidence of nondisabled-favored treatment, we cannot conclude that these differences are systematically based on disability status. Because our sample sizes are relatively small, and our data might not be normally distributed, conventional tests of statistical significance could fail to detect differences in treatment that are actually significant. Therefore, we use the Sign Test to determine whether the incidence of nondisabled favored treatment is significantly different from the incidence of disabled-favored treatment.³⁹

³⁸ Note that it is conceivable that random factors might *reduce* the observed incidence of nondisabled-favored or disabled-favored treatment, so that the gross-incidence measure is technically not an absolute upper-bound estimate for systematic discrimination.

³⁹ See Heckman, James J. and Peter Siegelman. 1993. "The Urban Institute Audit Studies: Their Methods and Findings" in *Clear and Convincing Evidence: Testing for Discrimination in America* (Fix, Michael, and Raymond J.

It is important to note that even when no statistical pattern of disability-based differential treatment is observed, individual cases of discrimination may occur. Specifically, even if the gross incidence of nondisabled-favored treatment is statistically insignificant, this does not mean that discrimination never occurred, but only that the number of cases was too small to draw any conclusions about systematic patterns across the sample as a whole. Similarly, for variables where gross measures of nondisabled-favored and disabled-favored are essentially equal, there may in fact be instances of disability-based discrimination, even though the overall pattern does not favor one group systematically. Finally, even when treatment on a single indicator appears to favor either the disabled or nondisabled tester, this does not necessarily mean that the entire test favors the tester. A qualitative review of the entire test file might be needed to assess the overall outcome across multiple measures.

Treatment Indicators. A visit with a housing provider is a complex transaction and may include many forms of favorable or unfavorable treatment. This report presents results for a series of individual treatment indicators that reflect important aspects of the housing transaction. Many, but not all of these indicators are common to both TTY and wheelchair tests. In selecting indicators for analysis, we have focused on forms of treatment that can be unambiguously measured, and appear to have real potential to affect the outcomes of the housing search. Ultimately, other analysts may choose to focus on additional or alternative treatment indicators. However, the indicators presented here provide a comprehensive overview of the treatment that testers received during their contact with rental agents.

Indicators of adverse treatment in rental housing tests address five critical aspects of the interaction between a renter seeking information and a landlord or rental agent. The first aspect addresses whether or not the tester was able to speak to a landlord or rental agent:

- Were you able to speak with a housing provider to discuss housing options?

The second aspect uses a group of indicators that measure the extent to which the tester with the disability and the tester without a disability received comparable information in response to their inquiries about the availability of the advertised housing unit and other similar units that would meet their needs:

- Was the advertised housing unit (or a unit with the same number of bedrooms) available?
- Were other units available?
- How many units were available?

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For in-person tests, testers not only inquired about the availability of housing units, but they also asked to inspect units that were available for rent. These treatment measures focus on whether the tester in the wheelchair and the nondisabled tester were able to inspect the advertised housing unit and/or other available units:

- Were you able to inspect a unit (if any were available)?
- How many units were inspected?

The third aspect explores potential differences in the costs quoted to each tester of the test pair for comparable housing:

- How much was the rent for available units?⁴⁰
- How large a security deposit was required?
- Was an application fee required?⁴¹

Testers not only inquired about the availability of housing units, but they also attempted to gain information about the rental process. Therefore, the fourth aspect focuses on whether the test partners were provided with similar information about the rental process:

- Did the housing provider invite the tester to pick up an application or offer to send one to the tester (phone tests), or invite the tester to complete an application on site or give the tester one to take home (in-person tests)?
- Did the housing provider say that a credit check was part of the application process?
- Did the housing provider say that a criminal background check was part of the application process?
- Did the housing provider request information about income, source of income, or occupation?

In general, testers who receive more information (including information about required credit checks or criminal background checks) are considered to be favored, because the housing provider has given them more details about what will be required to obtain housing.

⁴⁰ If a tester was given information for more than one unit at a site, we averaged the rent amounts, security deposit, and application fee quoted by the housing agent. For research purposes, any difference in dollar amount between the nondisabled and disabled testers for any of these financial items was counted as a difference in treatment.

⁴¹ Requiring an application fee from one tester but not the other is viewed as unfavorable treatment because it raises the cost of housing search.

The fifth aspect assesses the extent to which agents encouraged or helped the tester with a disability and the nondisabled tester to complete the rental transaction:

- Did the agent make follow-up contact?
- Did the agent invite the tester to come into the rental office and to view the available unit?
- Did the agent offer to send the tester an application?
- Were arrangements made for future contact?

Finally, for the in-person (wheelchair) tests, several indicators explore whether the tester with a disability could make required unit modifications or would be granted a parking accommodation:

- What was the agent's response to the request for unit modification?
- What was the agent's response to the request for parking accommodation?
- What conditions were placed on the unit modification or parking accommodation, if granted?

Because these questions were not raised by the nondisabled tester, these indicators are not used to measure *differential* treatment. They are simply used to reflect the percent of tests in which a modification or accommodation was denied.

Summary Indicators. In addition to presenting results for the individual differential treatment indicators discussed above, this report combines indicators to create *composite measures* for categories of treatment (such as housing availability or information about the application process) as well as for the transaction as a whole.⁴² The first type of composite classifies tests as nondisabled-favored if the nondisabled tester received favorable treatment on one or more individual items, while the tester with a disability received *no* favorable treatment. Tests are classified as "neutral" if one tester was favored on some individual treatment items and his or her partner was favored on even one item. This approach has the advantage that it identifies tests where one partner was unambiguously favored over the other. But it may incorrectly classify tests as neutral when one tester received favorable treatment on several items, while his or her partner was favored on only one. This approach also classified tests as neutral if one tester was favored on the most important item while his or her partner was favored

⁴² Note that indicators relating to reasonable modifications and accommodations are not included in these composite measures of differential treatment. And again, it is important to emphasize the difference between methods used for the statistical analysis of paired testing results and methods used to assemble or assess evidence of unlawful conduct in an individual case. No pre-determined set of decision criteria can substitute for case-by-case judgments about test results.

on items of lesser significance. Therefore, it may understate the overall incidence of differential treatment across indicators, but nonetheless provides useful measures of the *consistency* of adverse treatment.

In addition to the consistency approach, *hierarchical* composites were constructed by considering the relative importance of individual treatment measures to determine whether one tester was favored over the other. For each category of treatment measures (and for the overall test experience), a hierarchy of importance was established *independent* of analysis of the test results. For example, if a nondisabled tester found out about more available units than the tester with a disability, then the nondisabled tester was deemed to be favored overall, even if the tester with a disability was favored on less important items. Table 3-3 presents the hierarchy of treatment measures for both the TTY and the wheelchair tests.

Table 3-3: Construction of Hierarchical Composites*

TTY Tests	Rank	Wheelchair Tests	Rank
Able to speak to provider	1	Able to speak to provider	1
Advertised or similar unit available	2	Advertised or similar unit available	2
Number of available units	3	Number of available units	3
		Ability to inspect units	4
		Number of units inspected	5
Rent	4	Rent	6
Security deposit	5	Security deposit	7
Application fee	6	Application fee	8
		Told application needed	9
Application offered to tester	7	Application offered to tester	10
Informed about credit check	8	Informed about credit check	11
Informed about background check	9	Informed about background check	12
Asked for income information	10	Asked for income information	13
		Wait time	14
Encouraged to call back	11		
Invited to visit	12		

*Grey shading shows differences in the hierarchical measures used for TTY tests and wheelchair tests.

In the chapters that follow, two overall estimates of discrimination are highlighted. The first is a lower-bound estimate of systematic discrimination, based on the hierarchical composite measure. Because the hierarchical composite reflects both systematic discrimination and

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random differences in treatment, we subtract the overall incidence of disabled-favored treatment from the incidence of nondisabled-favored treatment to create a net, lower-bound estimate of overall discrimination. In addition to this lower-bound estimate, we report the overall incidence of consistent nondisabled-favored treatment – the share of tests in which the nondisabled tester was consistently favored over the tester with a disability (and the disabled tester was never favored). This represents our “best estimate” of the overall level of discrimination against persons with disabilities.

4. DISCRIMINATION AGAINST HOMESEEEKERS USING TTY SYSTEMS

The Disability Discrimination Study provides the first rigorous estimates of discrimination against deaf people who use TTY systems to inquire about the availability of advertised rental housing.⁴³ A total of 101 paired tests were completed during the winter of 2004, in which testers who were deaf used the TTY system with relay operators to inquire about available rental housing in the Chicago metropolitan areas, while nondisabled testers made comparable telephone inquiries.

Paired testing demonstrates that deaf people frequently experience discrimination by rental housing providers, many of whom refuse to accept TTY calls or provide less information about advertised rental units than they provide to hearing customers making telephone inquiries. In cases where both hearing and deaf testers were able to gain access to a housing provider and obtain information about an advertised unit, the deaf tester was often treated as a less-serious customer and received fewer opportunities for follow-up contact.⁴⁴

Unequal Access to Information

Deaf testers seeking rental housing were significantly less likely to be able to speak to a housing provider than were their hearing counterparts. In one of every four tests, only the hearing tester was able to speak to a housing provider regarding available units (compared to two percent of tests in which only the deaf tester was able to speak to the rental housing provider). Housing providers denied access to deaf testers in several ways, including simply hanging up, refusing requests for information, or questioning the veracity of the call or caller.

Table 4-1: Unequal Access to Information

INFORMATION ACCESS	Hearing Favored	Deaf Favored	Net Measure
Access to Information (N=101)	25.7%	2.0%	23.8%**
For net estimates, * indicates statistical significance at the 90% confidence level, while ** indicates significance at the 95% level (using a two-tailed test). Gross estimates are by definition statistically significant.			

⁴³ For purposes of this study, we use the term “deaf” to refer to persons with hearing or communication disabilities.

⁴⁴ Opportunity for follow-up contact includes any action or statement made by the housing provider suggesting follow-up with the possible renter. These actions include the housing provider saying he or she would call the tester back to follow-up with the initial phone conversation, inviting the tester to call him or her back, sending an application to the tester, or inviting the tester to see the rental unit in person.

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Both testers called on Tuesday morning and spoke with the same person. The non-disabled tester called first and the tester with the disability called an hour and 15 minutes later. Their narratives are reported here, edited only for grammar and to remove any identifying information.

Non-disabled Tester. On 2/24/04 at 9:25 am I called [PHONE NUMBER] and John from [NAME] Realtors answered the phone. I told him I was interested in the 1 bedroom apartment advertised, if he would have any available by 3/15/04. He said he had several available. He asked what my price range was and I told him my max budget was \$1,350. I proceeded to ask him what the info was on these units. Very quickly he went through the following. He said he had units for \$975-985, \$1,075, \$1,175, and \$1,250. I then asked him to clarify these rents and clearly tell me how many units I had to choose from. He did by telling me he had units ranging from \$975-985, a unit at \$1,075, a unit at \$1,175 and \$1,250. I then proceeded to ask him what kind of fees were involved and he said a \$50 application fee and a \$250 non-refundable admin. fee only if you are approved. In other words if you are denied you get that money back. Both fees are at application. I asked him his lease terms and he said 1 year typical terms. He said the building was a courtyard building and has three different floor plans. I then pushed for more info and asked for the exact locations of the available units and he said [ADDRESS] has the \$975-985, \$1,075 and \$1,175 rents vacant and the \$1,250 rent is at [ADDRESS] vacant. I asked him to further clarify the \$250 non-refundable fee and he said that is all that is asked because a lot of people are saving for their real estate purchase or downpayment. I thanked him for his time and told him I am calling around and I appreciated his time and he said no problem and the call ended at 9:31am.

Deaf Tester. The disabled tester's narrative is the verbatim report automatically generated by the TTY system.

relay operator: Irc ca 1683f (ur caller id will send) GA [go ahead]
tester: Hello pls block caller id and pls dial [PHONE NUMBER] pls GA
relay operator: (ur caller id blocked) dialing [PHONE NUMBER] ringing 1 ...
tester: Relay, are we having trouble with communication? GA
relay operator: The person calling you is either deaf or hard of hearing. They will be typing their conversation, which will be read to you. When you hear the phrase, "go ahead," please respond directly to the caller. The operator will type everything that is heard back to the caller. One moment for your call to begin. GA
tester: Hello my name is Laura and I'm calling to inquire about the ad in the Chicago Reader for the one bedroom apartment on [ADDRESS]. Is that still available and what is your name? GA
Realtor: My name is [NAME] and that's not the correct address. It's [ADDRESS] and the apt is available for immediate occupancy. Our office is located at [ADDRESS] so she needs to come by the office and we're open until 7 in the evening tonight, Wednesday and Thursday night 'till 5:30 on Friday night. 11 to 4 on Sat and Sun. So umm she can come by and we can walk over to the property which is only a block or 2 away and we'll be happy to show it to her and if she has any other questions I will give her the fax number and we will... xxx missed. Our fax number is as follows [FAX NUMBER] and this completes my call and I can't stay on the phone any longer. I am in a meeting if any other questions contact me by fax (person hung up).
irc 1683f ga or sk
tester: Thank you sk

Some housing providers simply hung up on the deaf testers. Testers using TTY technology were required to confirm with the relay operator that the housing provider had heard the entire explanation of how a TTY call works before a test could be considered a “hang up.” In a number of instances, deaf testers had to make several attempts to call a housing provider before the relay operator was even able to complete the explanation. Even after the call was explained, some housing providers gave no specific reason for not wanting to speak to the deaf tester, or they provided a seemingly irrelevant response from someone who had available housing to rent. Examples include:

“No, I don’t want to speak with them.”

“No, we don’t need that.”

“I can’t do this right now. This is a business.”

“I don’t want to talk to anyone I don’t know.”

After the relay operator’s second attempt to explain the TTY call, one housing provider said, “Hello, I don’t speak English.” However, the non-deaf tester was able to get complete information when he called the same number.⁴⁵ In all of the tests involving a hang up, the deaf tester was never able to speak to the housing provider at all.

Other housing providers gave reasons for refusing to provide any information to deaf testers. In some cases, providers informed the relay operator that the tester had to call back at another time or had to find information about the housing some other way, such as via fax or the Internet. Some deaf testers were also told they must come into the office in order to get information. (In the two instances where a hearing tester was refused information, he was never told to find information elsewhere nor was he required to come in person to the housing site; he was only asked to call back later.) Examples of comments made to deaf testers by housing providers refusing to provide information include the following:

“I don’t want to accept this call. That person can e-mail me.”

“If she has any other questions, I will give her the fax number.”

“You need to come to see the place and we’ll talk after that...Get all your information together and come and see the apartment.”

“She needs to come by the office...She can come by and we can walk over to the property which is only a block or two away.”

⁴⁵ It could not be discerned if both testers spoke to the same housing provider, because the tests were conducted by phone and the deaf tester was not able to get far enough into the conversation to ask for the provider’s name.

Several housing providers also refused to give all or some information about the available housing to deaf testers by challenging the seriousness or veracity of the call.

“How did you get my number anyway?”

“I don’t understand why they are contacting me.”

“Are you being serious? Are you looking for an apartment? I don’t have time for this. I will notify the phone company.”

When a rental housing provider refuses to take a call from a potential customer or refuses to provide any information about available housing, he effectively denies access to any units he may have available. Many homeseekers gather initial information about available rental options over the telephone. For a deaf person who communicates primarily through sign language, the ability to obtain information over the telephone is especially important. The decision by rental housing providers not to accept TTY calls essentially “slams the door” on deaf homeseekers, making it impossible for them to conduct their housing search independently. Also, the fact that some housing providers did accept TTY calls and provided complete information to deaf testers confirms that it is feasible to use the technology in a way that provides equal treatment to deaf homeseekers.

Comparable Information About Available Units

When both deaf and hearing testers gained access to a rental housing provider, neither tester was systematically favored with respect to information about available units. For the large majority of tests, units were available to both testers, and the housing provider told both about the same number of units.⁴⁶ In addition, in tests where at least one unit was available to each tester, the housing provider quoted similar rental amounts, application fees, and security deposits to each tester.⁴⁷

⁴⁶ In addition to asking about available rental housing units with the same number of bedrooms listed on the test assignment, testers were trained to inquire about available units with a greater number of bedrooms than assigned. Few units of this type were available, however, and thus were not included in the results.

⁴⁷ Because testing was completed over the telephone, specific unit numbers were not available. In addition, many providers advertised multiple units, making it impossible to designate a single unit as the advertised unit. The rent amount, security deposit, and application fees are, therefore, averages for all of the available units for which the housing provider provided information.

Table 4-2: Comparable Information About Available Units

UNIT AVAILABILITY	Hearing Favored	Deaf Favored	Net Measure
Rental Unit Available (N=73)	1.4%	1.4%	0.0%
Number of Units Available (N=73)	20.6%	26.0%	-5.5%
Rent Amount (N=65)	15.4%	26.2%	-10.8%
Security Deposit (N=66)	15.2%	21.2%	-6.0%
Application Fee (N=66)	4.5%	13.6%	-9.1%
Overall Treatment (N=73)	21.8%	26.7%	-5.0%
For net estimates, * indicates statistical significance at the 90% confidence level, while ** indicates significance at the 95% level (using a two-tailed test). Gross estimates are by definition statistically significant.			

Less Information About the Application Process

Although they received comparable information about available units, deaf testers frequently were not given as much information and encouragement about the application process as their hearing partners. The DDS testing protocols required both testers to ask about application procedures, but many housing providers provided the deaf testers with less information. Specifically, prerequisites for renting a house or apartment often include a completed application form, credit report, and criminal background check.

Housing providers were significantly less likely to offer the deaf tester an application or to inform him or her that a credit check would be required. In three of every ten tests, the housing provider either invited the hearing tester to pick up an application or offered to mail the application, but did not make the same offer to the deaf tester (compared to 7.3 percent of tests where the housing provider favored the deaf tester). In three of every ten tests, the hearing tester was told that a credit check was necessary prior to renting an available unit, while the deaf tester was not given any information regarding a credit check requirement (again compared to 7.3 percent of tests where the deaf tester was given more information).

Table 4-3: Less Information About the Application Process

INFORMATION ABOUT APPLICATION PROCESS	Hearing Favored	Deaf Favored	Net Measure
Application Offer (N=69)	30.4%	7.3%	23.2%**
Credit Check (N=69)	31.9%	7.3%	24.6%**
Criminal Background Check (N=69)	4.4%	2.9%	1.5%
Income Information (N=69)	2.9%	10.1%	-7.3%
Overall Treatment (N=69)	33.7%	10.9%	22.8%**
For net estimates, * indicates statistical significance at the 90% confidence level, while ** indicates significance at the 95% level (using a two-tailed test). Gross estimates are by definition statistically significant.			

Overall, deaf testers received less-favorable treatment than their nondisabled partners across all of these application indicators in three of every ten tests (and were favored in only about one of ten tests). As a result, the net estimate of discrimination for this category of treatment is statistically significant at 22.8 percent.

Fewer Invitations for Follow-Up

Deaf testers also experienced significant adverse treatment with respect to invitations for follow-up contact. More than one third of the housing providers invited only the hearing testers to call back if they were interested in a unit and to visit the properties to look at units or to fill out an application (compared to 8.7 percent of tests in which the tester with a disability was favored).

Overall, deaf testers received less-favorable treatment than their nondisabled test partners across these follow-up indicators in three of every ten tests (and were favored in only 11 percent). As a result, the net estimate of discrimination for this category of treatment is statistically significant at 19.8 percent (see Table 4-4).

Summary

Testing for discrimination against deaf persons who use TTY systems to inquire about advertised rental housing in the Chicago Metropolitan Area reveals significant levels of adverse treatment (see Table 4-5). Specifically, in one of every four calls, housing providers refused to

Table 4-4: Fewer Invitations for Follow-Up

FOLLOW-UP	Hearing Favored	Deaf Favored	Net Measure
Call Back (N=69)	20.3%	8.7%	11.6%
Visit Invitation (N=69)	34.8%	8.7%	26.1%**
Overall Treatment (N=69)	30.7%	10.9%	19.8%**
For net estimates, * indicates statistical significance at the 90% confidence level, while ** indicates significance at the 95% level (using a two-tailed test). Gross estimates are by definition statistically significant.			

communicate with deaf testers, while accepting and responding to conventional telephone inquiries. When deaf testers were able to communicate with a housing provider, they received comparable information about available units, but less information about the application process than their nondisabled partners. Deaf testers also experienced significant adverse treatment with respect to invitations for follow-up. Overall, deaf testers received less favorable treatment than their nondisabled partners in six of every ten tests conducted (and were favored in about one third). The lower-bound (net hierarchical) estimate of discrimination against deaf persons using TTY systems is statistically significant at 26.7 percent. In addition, deaf testers experienced *consistently* adverse treatment relative to their hearing partners in almost half of all tests.

Table 4-5: Summary Measures of Consistent Adverse Treatment

SUMMARY MEASURES	Hearing Favored	Deaf Favored	Net Measure
Access to Information (N=101)	25.7%	2.0%	23.8%**
Unit Availability and Cost (N=73)	21.8%	26.7%	-5.0%
Application Process (N=69)	33.7%	10.9%	22.8%**
Follow-Up (N=69)	30.7%	10.9%	19.8%**
Hierarchical Composite (N=101)	61.4%	34.7%	26.7%**
Consistency Composite (N=101)	49.5%	9.9%	39.6%**
For net estimates, * indicates statistical significance at the 90% confidence level, while ** indicates significance at the 95% level (using a two-tailed test). Gross estimates are by definition statistically significant.			

5. DISCRIMINATION AGAINST HOMESEEKERS USING WHEELCHAIRS

The Disability Discrimination Study provides the first rigorous estimates of discrimination against people who use wheelchairs and visit rental housing providers in person to inquire about the availability of units. A total of 99 paired tests were completed during the spring and summer of 2004, in which testers who had physical disabilities and used wheelchairs visited advertised rental properties in person.

It is far more difficult for a person using a wheelchair to find rental housing in the Chicago area than for a nondisabled person. More than a third of rental homes and apartments that are advertised in the City of Chicago and surrounding Cook County are in buildings that are inaccessible for wheelchair users even to visit. When persons using wheelchairs visit properties that are accessible (or could reasonably be made accessible), they can meet with and speak to rental housing providers as frequently as nondisabled persons, but they are often told about and shown fewer units, receive less information about available units, and are treated as less serious rental customers. Finally, 16 percent of rental housing providers who indicated that they had units available for the wheelchair user refused to make or allow for reasonable unit modifications, and about 19 percent of those who had on-site parking refused to make the reasonable accommodation of providing a designated accessible parking space.

Many Advertised Units Inaccessible

Many advertised properties were inaccessible to wheelchair users. We eliminated advertisements at the sampling stage if there was any indication the property or the unit would be inaccessible. Then, after the advance call but prior to assigning testers to a particular unit, project staff drove by the advertised property to assess whether or not it would be accessible to people using wheelchairs. Using our drive-by approach, we found that roughly 36 percent of the sampled ads were ineligible for testing because the properties appeared to be inaccessible for people in wheelchairs to even visit. In other words, at best, a person who uses a wheelchair is limited to only about two-thirds of the Chicago area rental housing market from the outset.⁴⁸

⁴⁸ As discussed earlier, this study did not attempt to determine whether sampled rental properties were covered by the design and construction requirements of the Fair Housing Act. Moreover, properties that appeared to be accessible based upon the reconnaissance process could have had interior barriers that would make them inaccessible for persons using wheelchairs.

Table 5-1: Many Advertised Units Inaccessible

Testing Week	Percent Deemed Inaccessible after Drive-by	Testing Week	Percent Deemed Inaccessible after Drive-by
Week 1	35.9%	Week 9	50.5%
Week 2	34.7%	Week 10	31.6%
Week 3	11.1%	Week 11	58.0%
Week 4	35.7%	Week 12	44.4%
Week 5	12.3%	Week 13	48.4%
Week 6	40.0%	Week 14	60.0%
Week 7	40.0%	Week 15	47.8%
Week 8	35.0%	TOTAL	36.0%

Comparable Access to Housing Providers

Neither the nondisabled nor testers with disabilities were systematically favored with respect to access to housing providers. For a large majority of tests, both testers were able to speak to a rental housing provider close to his or her scheduled appointment time.

Table 5-2: Comparable Access to Housing Providers

ACCESS TO INFORMATION	Nondisabled Favored	Wheelchair User Favored	Net Measure
Able to Speak to Rental Housing Provider (N=99)	6.1%	1.0%	5.1%
Wait time (N=92)	13.0%	10.9%	2.1%
Overall Treatment (N=99)	18.2%	11.1%	7.1%
For net estimates, * indicates statistical significance at the 90% confidence level, while ** indicates significance at the 95% level (using a two-tailed test). Gross estimates are by definition statistically significant.			

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Both testers dropped in without an appointment at the apartment complex on a Friday within two and a half hours of one another. The disabled tester went first at 11:00 am; his visit lasted 6 minutes. The non-disabled tester followed at 1:00 pm; his visit lasted 20 minutes. Their narratives are reported here, edited only for grammar and to remove any identifying information.

Non-disabled Tester. I arrived at [ADDRESS] at 1:00 PM for a drop-in visit. I was greeted in the lobby by the doorman, who called up to the rental office and then took my name and sent me up to the 2nd floor office. I was immediately greeted by [NAME], who asked me to fill out a visitor's card, which asked for my name and phone number, but not my occupation...and the size apartment I sought and rent range. After [NAME] looked over my card, she began to collect some brochure materials for me, floor plans, price sheets.

She asked me to follow her, after she got some apt. keys, and we proceeded up the elevator to the 8th floor, where we viewed apt. #816. This apartment is a two bedroom unit, with two full bathrooms and a very nice view. It has an up-to-date kitchen and the apt. has been painted and the carpets cleaned. [NAME] explained that the rent on this unit is \$1485/mo. She pointed out that all units had a lease length that is negotiable, but there is a special with a one-year lease, for 2-months free parking, which is normally \$210/mo. She went on to add that there is no security deposit for the rental units; however, there's a one time non-refundable move-in fee of \$375 and an application fee of \$50 for a credit check. She said that there was an identical apartment on the 18th floor (1816) that was also available in my timeframe, however, the rent for the higher floor, was \$1530/mo. [NAME] casually asked me where I worked and I told her that I worked right down Illinois St. at [NAME OF COMPANY]. She showed me by the pool, fitness center, cyber cafe, laundry facilities and the lobby and talked about the amenities in the building, including storage lockers and a bike room. I asked what was included in the rent, and she said that water and electric are paid by the tenants, as well as cable and phone. All the appliances are electric.

When we got back to the office, [NAME] put together all the paperwork for me, and gave me a promotional bag to put it all into, along with her business card. She asked me if I liked the apartment, and "could I have her take it off the market for me today?" I said that I had just started looking, but I thought they were very nice. She said that she could give me an application to fill out if I decide that I'd like to move in there. I said, "sure, I can take that with me." [NAME] shook my hand and said, "thank you for coming by, if you have any questions, be sure to give me a call." I said, "thank you, I will." We said goodbye, and I got back to my car at 1:20 PM.

Disabled Tester. I arrived at [NAME OF COMPLEX] at 10:26 am. The door attendant asked how could he help me. I said I was looking for a 2 bedroom. He asked if I had an appointment. [I told him no.] He said that was unusual or strange at a low voice. He said he would call upstairs to see if they could show the apartments. When he was speaking to someone upstairs - I could not hear what he was saying. When he got off the phone he told me that the rep had two other appointments to show and he would not be available. I told him I could wait. He said no, he was told to give me packet and business card and if I had any questions the information would be provided in the packet. As he handed me the packet he showed me the website address. He said, "Is that ok with you?" I said "Not really." He said nothing. I stated that the ad didn't say an appointment was necessary. He came around the desk, gave me the packet, and escorted me to the door. I got in the cab and left.

Less Information About Available Units

Wheelchair users experienced significant levels of adverse treatment with respect to housing availability. In five percent of tests, the rental housing provider told the nondisabled tester that a unit was available while telling the tester with a disability that no units were available (compared to no tests in which the tester with a disability was favored).

After telling testers with disabilities that no units were available, some providers suggested that they look elsewhere for housing:

“He told me to go down the street and look for places that have rentals available. He told me, ‘You can find lots of rentals down busy streets.’”

“I was told that nothing was available, but to see about an apartment locator service so I wouldn’t have to go around so much.”

“The housing provider later stated, ‘You would be better off buying my house. It would be more accessible to you.’ “

Even when both testers were told that a rental unit was available, wheelchair users were not always told about as many units as comparable nondisabled testers. Specifically, in more than one in four tests, the nondisabled tester was told about more units than the tester who used a wheelchair (compared to nine percent of tests where the wheelchair user was favored).

Table 5-3: Less Information About Available Units

UNIT AVAILABILITY	Nondisabled Favored	Wheelchair User Favored	Net Measure
Rental Unit Available (N=88)	4.5%	0.0%	4.5%
Number of Units Available ⁴⁹ (N=78)	26.9%	9.0%	17.9%**
Ability to Inspect Unit (N=78)	37.2%	6.4%	30.8%**
Number of Units Inspected (N=78)	11.5%	1.3%	10.2%**
Overall Treatment (N=88)	35.4%	7.1%	28.3%**

For net estimates, * indicates statistical significance at the 90% confidence level, while ** indicates significance at the 95% level (using a two-tailed test). Gross estimates are by definition statistically significant.

⁴⁹ This and all remaining individual treatment indicators were constructed for the 78 tests in which both testers were able to speak to a housing provider and both were told about at least one unit in the same size category.

Wheelchair users also received less-favorable treatment than comparable nondisabled testers with respect to unit inspections. In almost four of every ten tests where both testers were told that a rental unit was available, only the nondisabled tester was able to inspect a unit (compared to 6 percent of tests in which the tester with a disability was favored). And in 12 percent of tests, the nondisabled tester was able to inspect more units than the comparable tester with a disability (compared to only 1 percent in which the tester with a disability was able to inspect more).

Overall, wheelchair users received less-favorable treatment than their nondisabled counterparts with respect to unit availability and inspections in more than a third of tests (compared to only 7.1 percent of tests in which wheelchair users were favored). Thus, the net estimate of discrimination for this category of treatment is statistically significant at 28.3 percent.

Lower Fees

In contrast to inspection opportunity findings, housing providers quoted lower security deposit amounts and lower application fees to testers who used a wheelchair. Although testers with disabilities were also more likely to be quoted lower rent amounts, this difference was not statistically significant. Wheelchair users were quoted lower security deposit fees in 27 percent of tests, while nondisabled testers were quoted lower fees in only 14 percent of tests. In 17 percent of tests, the wheelchair user was quoted a lower application fee (compared to six percent of tests where the nondisabled tester was quoted a lower application fee). Overall, wheelchair users were quoted higher costs than their nondisabled counterparts in 21.2 percent of tests (compared to 31.3 percent in which wheelchair users were quoted lower costs). The net estimate of discrimination for this category of treatment is not statistically significant.

Table 5-4: Lower Fees

FEES	Nondisabled Favored	Wheelchair User Favored	Net Measure
Rent Amount (N=78)	24.4%	25.6%	-1.2%
Security Deposit (N=78)	14.1%	26.9%	-12.8%*
Application Fee (N=78)	6.4%	16.6%	-10.2%*
Overall Treatment (N=78)	21.2%	31.3%	-10.1%
For net estimates, * indicates statistical significance at the 90% confidence level, while ** indicates significance at the 95% level (using a two-tailed test). Gross estimates are by definition statistically significant.			

Although these data indicate that testers who use wheelchairs were favored with respect to rental amounts and fees, this analysis is approximate. Testers often were unable to obtain exact unit numbers for each available unit (or for the advertised unit). The analysis was, therefore, based on the mean quoted fee for all units available to a tester. Because more units were made available to nondisabled testers, the mean fee might include units that may be more expensive and possibly of better quality than the units available to the testers using a wheelchair.

Less Information About the Application Process

Testers using wheelchairs also experienced unfavorable treatment with respect to information about the application process. Compared to the nondisabled testers, testers using wheelchairs were far less likely to be informed of requirements for renting a unit, such as submitting a completed application, having a credit check run, or providing information on their source of income. In addition, housing providers were more likely to offer the nondisabled tester an application to begin the rental process. Overall, wheelchair users received less information than their nondisabled partners in 44.4 percent of tests (compared to only 14.1 percent percent in which wheelchair users received more information). Thus, the net estimate of discrimination for this category of treatment is statistically significant at 30.3 percent.

Table 5-5: Less Information About the Application Process

INFORMATION ABOUT APPLICATION PROCESS	Nondisabled Favored	Wheelchair User Favored	Net Measure
Application Needed to Rent (N=78)	19.2%	0.0%	19.2%**
Application Offered to Tester (N=78)	21.8%	10.3%	11.5%*
Credit Check (N=78)	26.9%	3.8%	23.1%**
Criminal Background Check (N=78)	5.1%	5.1%	0.0%
Income Information (N=78)	24.4%	10.3%	14.1%**
Overall Treatment (N=78)	44.4%	14.1%	30.3%**

For net estimates, * indicates statistical significance at the 90% confidence level, while ** indicates significance at the 95% level (using a two-tailed test). Gross estimates are by definition statistically significant.

Although all testers were assigned to pose as being employed full-time, some housing providers assumed that the tester with a disability was receiving some sort of subsidy that would either pay for rent or finance the unit modification:

“We do not provide subsidized housing.”

“We do not take Section 8. [after asking the tester repeatedly if he has Section 8]”

“So would the Chicago Housing Authority pay for that? [after the tester requests a unit modification]”

Comparable Provider-Initiated Follow-up

Follow-up contact by housing providers, such as phone calls to ask if prospective tenants are still interested in a unit or to thank them for their interest, is rare in rental housing transactions. And because they are so rare, any such contact might be seen as favorable treatment of a prospective renter in the form of increased service and encouragement on the part of the housing provider. Only 17 of the DDS wheelchair tests involved follow-up contact initiated by the housing provider. As discussed further below, five of these tests involved the housing provider responding to the request for a unit modification or parking accommodation without further inquiry regarding the tester’s continued interest in renting the unit. In these cases, the housing provider did not contact the nondisabled tester.

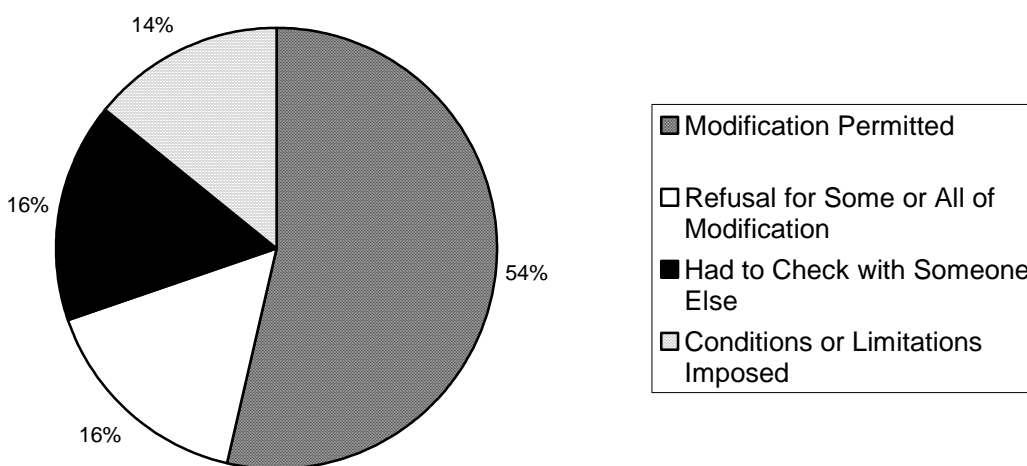
Therefore, our analysis of provider-initiated follow-up is limited to 12 tests, which is not sufficient to provide statistical results. In four of these tests, both testers received follow-up contact, either by phone or by mail. In these contacts, the housing provider wanted to know if the tester was still interested in renting a unit or wanted to provide information about other units that had come available since the tester’s initial visit. In one test, both testers were sent thank you cards in the mail. In the eight remaining tests, only one tester in the pair received follow-up contact from the housing provider. In two of these cases, only the tester with a disability received follow-up; and in six, only the nondisabled tester received follow-up. Two of the tests in which only the nondisabled tester received follow-up were cases in which the tester with a disability was told during the site visit that no units were available.

Refusal of Reasonable Modification and Accommodation

When the testers using wheelchairs were able to inspect any available units, they asked the housing provider if they would be permitted to make a reasonable modification that would

make the unit more accessible for them.⁵⁰ As discussed in Chapter 3, all of the requested modifications were limited to a single unit, and all were reasonable in scope. Testers assured the housing providers that they would pay for the modification and pay to have the unit returned to its original condition at the end of their occupancy. About one of every six housing providers (16 percent) refused to allow some or all of the modification that was requested. Slightly more than half of housing providers agreed outright to allow the modification. The remaining 30 percent of tests generated an inconclusive response. Specifically, 14 percent of the providers agreed to the request but indicated that some conditions or limitations would apply. For example, one tester was told that the apartment was still being shown to prospective tenants, but that if nobody else leased it, the landlord would allow the modification. Finally, 16 percent of providers indicated that they had to check with someone else.

Figure 5-1: Refusal of Reasonable Modification



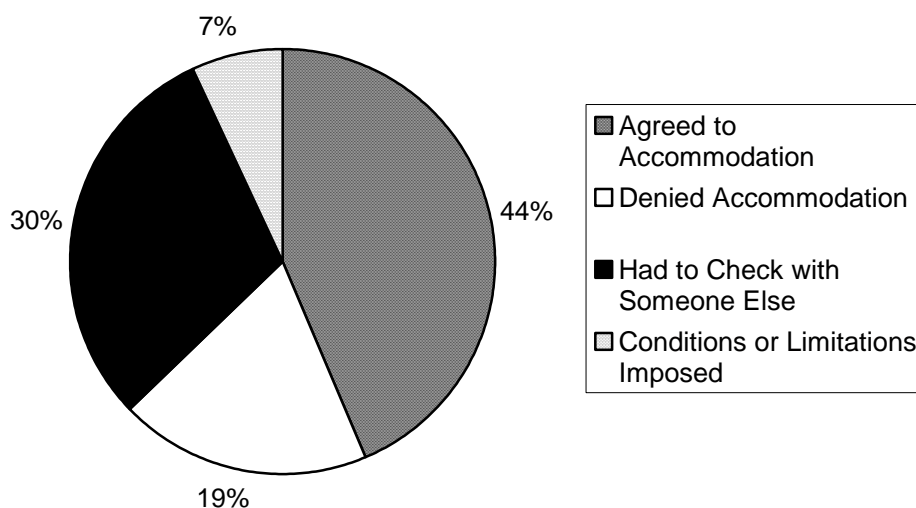
For properties with on-site parking (56 tests), testers also asked whether an accessible parking space could be made available and designated for their exclusive use. Two of every ten housing providers (19 percent) refused to make this reasonable accommodation for

⁵⁰ Using the hierarchy of modifications described in chapter 3, testers requested the *first relevant* modification from the list. A modification was identified for every test in which the tester with a disability was able to inspect a unit – a total of 80 tests.

wheelchair users, while 44 percent of providers agreed to make it. The remaining 37 percent of tests concluded with an ambiguous response. Specifically, 7 percent of providers agreed to make the modification but imposed conditions or limitations, and three of ten indicated that they had to check with someone else.

In five tests, housing providers called testers back regarding the request for unit modification or parking accommodation. For three of these tests, the housing provider said that the modification or accommodation could be made; on one, the request was denied, and on the last, the housing provider still did not know whether the request could be honored. Testers initiated follow-up calls regarding modifications or accommodations in 11 tests.⁵¹ In one test, the housing provider said he still did not know if the parking accommodation could be made, but called the tester back immediately to inform her that, in fact, it could. In five tests, the housing provider said the unit modification or parking accommodation simply could not be made, and in five other tests, the housing provider said he still did not know if the modification or accommodation could be made.

Figure 5-2: Refusal of Reasonable Accommodation



⁵¹ Disabled testers were instructed to conduct follow-up phone calls if they were not given a definite response to their request for unit modification or parking accommodation. Unfortunately, not all testers conducted follow-up calls on all required tests; Urban Institute staff identified seven such tests.

In two cases where the housing provider agreed that the requested unit modification would be allowed, we have evidence to suggest that this request would not really be honored. Specifically, although the tester with a disability was told that the unit modification could be made, the housing provider told the nondisabled partner that the modification would not be allowed. For example, in one of these tests, the tester with a disability reported: “I told him that I used a wheelchair and I would need to widen the bathroom door. He told me he would tell Omar the janitor to make the door wider.” The nondisabled tester visited later the same day and reported: “He pointed out the bathroom door and said someone had asked to modify the width of the door but that was not possible, it would change the structure of the building. He said they would not fit in the bathroom because of their wheels.”

Summary

Testing for discrimination against persons using wheelchairs to search for rental housing in the City of Chicago and surrounding Cook County reveals significant levels of adverse treatment. Specifically, more than a third of advertised rental homes and apartments are in buildings that are inaccessible for wheelchair users to even visit. As illustrated in Table 5-6, when persons using wheelchairs visit properties they are systematically told about and shown fewer units than comparable nondisabled homeseekers. In addition, persons using wheelchairs receive less information about available units and less information about the application process

Table 5-6: Summary Measures of Consistent Adverse Treatment

Information about Application Process	Nondisabled Favored	Wheelchair User Favored	Net Measure
Access to Information (N=99)	18.2%	11.1%	7.1%
Unit Availability & Inspection (N=88)	35.4%	7.1%	28.3%**
Unit Costs (N=78)	21.2%	31.3%	-10.1%
Application Process (N=78)	44.4%	14.1%	30.3%**
Hierarchical Composite (N=99)	59.6%	29.3%	30.3%**
Consistency Composite (N=99)	32.3%	9.1%	23.2%**
For net estimates, * indicates statistical significance at the 90% confidence level, while ** indicates significance at the 95% level (using a two-tailed test). Gross estimates are by definition statistically significant.			

than their nondisabled counterparts. Overall, wheelchair users experience unfavorable treatment in almost six of ten visits to advertised rental properties (but were favored over their nondisabled counterparts in only three of ten visits). The lower-bound (net hierarchical) estimate of discrimination against wheelchair users is statistically significant at 30.3 percent. In addition, wheelchair users experienced *consistently* adverse treatment relative to their nondisabled partners in 32.3 percent of visits.

Because the wheelchair users who served as testers for this study had differing degrees of disability, we tested the hypothesis that persons who appear most severely disabled may experience more discrimination.⁵² Indeed, we found that wheelchair users whose severity of disability was classified as “high” were more likely to experience unfavorable treatment relative to their nondisabled partners than were wheelchair users whose severity of disability was classified as “low” or “moderate.” However, due to the small sample sizes, these differences are not statistically significant.

In addition to differential treatment, almost one in six rental housing providers who indicated that they had units available for the wheelchair user refused to allow for reasonable unit modification. Almost one in five of those who had on-site parking refused to make the reasonable accommodation of providing a designated accessible parking space.

⁵² Each tester who used a wheelchair was classified according to *apparent* severity of disability into one of three categories – low, moderate, and high. Forty-eight tests were conducted by testers whose severity of disability was classified as low or moderate, and 51 were conducted by testers whose severity of disability was classified as high.

6. SUMMARY AND IMPLICATIONS

The Disability Discrimination Study was designed to advance the state of the art in the use of paired testing to measure discrimination against persons with disabilities for both research and enforcement purposes. Because the population of persons with disabilities is diverse and the challenges for effectively measuring discrimination are substantial, this research effort was conducted in two phases. The first phase was exploratory; the Urban Institute developed and implemented a wide variety of testing approaches targeted to different groups of persons with disabilities and different forms of housing market discrimination. The second—pilot—phase of the study produced rigorous statistically representative estimates of the incidence of discrimination against two groups of persons with disabilities in the Chicago Metropolitan Area. Specifically, this phase focused on the treatment of deaf people who used the TTY system to inquire about advertised rental housing, and on the treatment of persons in wheelchairs who visited rental properties in person to inquire about available units. This chapter briefly summarizes findings from both phases of this research effort and discusses their implications for ongoing research and policy.

Summary of Findings

The study found paired testing to be a feasible and effective tool for detecting and measuring discrimination by rental housing providers against persons with disabilities. It can be used to capture *both* differential treatment discrimination *and* refusal to make reasonable accommodation or permit reasonable modification, and the paired research testing methodology can be adapted for a wide variety of disabilities and housing circumstances.⁵³ Moreover, persons with disabilities are effective testers. Generally, it is not necessary to have nondisabled testers pose as people with disabilities or as their proxies. However, some testers with disabilities may require accommodation in the testing practice itself, including assistance in traveling to test sites or completing test reporting forms. In some cases, these accommodations can increase the costs of completing paired tests.

Both groups of persons with disabilities who were studied in the pilot phase of this project encountered significant levels of adverse treatment when they inquired about advertised rental housing in the Chicago area, compared to comparable nondisabled homeseekers. People who were deaf and used the TTY system to inquire about advertised rental units in the Chicago Metropolitan Area were refused service in one out of four calls. Even when housing providers accepted their calls, the TTY users received significantly less information about the

⁵³ Of course, paired testing may not be well-suited for detecting and measuring all forms of discriminatory treatment that may occur in a housing transaction, or all types of disabilities.

application process and fewer opportunities for follow-up contact than comparable hearing customers making telephone inquiries. Overall, testers who were deaf and used the TTY system experienced consistently adverse treatment in 49.5 percent of their calls, and our lower-bound (net) estimate of the incidence of discrimination is 26.7 percent.

People using wheelchairs who visited rental properties in the Chicago Metropolitan Area to inquire about advertised units were just as likely as nondisabled customers to meet with a housing provider. However, in more than a quarter of all visits they were told about fewer available housing units, and in three of ten visits they were denied the opportunity to inspect any units. Moreover, wheelchair users received less information about the application process. However, they appear to have been quoted lower fees than comparable nondisabled customers. Overall, testers using wheelchairs who visited advertised rental properties in person experienced consistent adverse treatment in 32.3 percent of their visits, and our lower-bound (net) estimate of the incidence of discrimination is 30.3 percent.

The most recent study of housing discrimination based on race and ethnicity included the Chicago Metropolitan Area and provides estimates of the incidence of adverse treatment experienced by African American and Hispanic renters there.⁵⁴ Although the testing protocols differed, we can compare the incidence of adverse treatment against African Americans and Hispanics to our new estimates of adverse treatment against wheelchair users for selected treatment measures. These comparisons indicate that persons with disabilities face more frequent adverse treatment in the Chicago area rental market than African Americans or Hispanics. In particular, persons who are deaf and use the TTY system were unable to obtain any information from rental housing providers in 26 percent of their inquiries, while minorities were always able to obtain at least some information and service. In addition, persons using wheelchairs who visited rental housing providers in person were approximately as likely as African Americans or Hispanics to be denied information about available units, but substantially more likely to be denied opportunities to inspect units. Not only were testers with disabilities more likely to experience *unfavorable* treatment (relative to their nondisabled partners) than blacks or Hispanics, they were much less likely to be favored. As a consequence, the net measures of systematic discrimination against persons with disabilities are generally higher than the net measures of discrimination on the basis of race and ethnicity.

⁵⁴ Turner, Margery Austin, Stephen L. Ross, George C. Galster, and John Yinger. 2002. *Discrimination in Metropolitan Housing Markets: Phase I Annex*. Washington, D.C.: U.S. Department of Housing and Urban Development.

Table 6-1: More Adverse Treatment Against Persons with Disabilities Than Against Blacks and Hispanics⁵⁵

Treatment Measures	In-Person Wheelchair Tests			In-Person Black/White Tests			In-Person Hispanic/Non-Hispanic White		
	nondisabled favored	disabled favored	net measure	white favored	black favored	net measure	non-Hisp white fav	Hispanic favored	net measure
Advertised unit available?	4.5%	0.0%	4.5%	6.2%	3.1%	3.1%	10.8%	7.7%	3.1%
Number of units available	26.9%	9.0%	17.9% **	21.5%	18.5%	3.1%	26.2%	13.8%	12.3%
Able to inspect units?	37.2%	6.4%	30.8% **	6.2%	4.6%	1.5%	7.7%	10.8%	-3.1%
Number of units inspected	11.5%	1.3%	10.2% **	12.3%	13.8%	-1.5%	16.9%	16.9%	0.0%

For net estimates, * indicates statistical significance at the 90% confidence level, while ** indicates significance at the 95% level (using a two-tailed test). Gross estimates are by definition statistically significant.

In addition, persons with disabilities are frequently denied their requests for reasonable modification and reasonable accommodation needed to make the available housing fully accessible for them. Almost one of every six housing providers who indicated that units were available refused to allow reasonable unit modification needed by wheelchair users. Similarly, one of every five of those with on-site parking refused to make the reasonable accommodation of providing a designated accessible parking space for a wheelchair user.

Discrimination is not the only obstacle that people with mobility impairment face in searching for rental housing. Although the tests conducted as part of this study were not intended to measure the extent of compliance with the design and construction requirements of the Fair Housing Act, they did highlight the substantial challenges persons with disabilities face. For example, in the Chicago area, at least a third of advertised rental properties are apparently not accessible for wheelchair users even to visit, severely limiting their housing options.

Implications for Further Research

The two pilot testing efforts conducted as part of this study clearly establish the feasibility and effectiveness of paired testing as a research tool for measuring the extent and forms of discrimination against persons with disabilities. Additional testing studies can and should be conducted – extending the methodology to more types of disabilities, more segments of the housing market, and more metropolitan areas.

More specifically, based on the experience gained from this study, both telephone testing for discrimination against persons who are deaf and use TTY systems and in-person testing for discrimination against persons using wheelchairs could be conducted for a nationally representative sample of housing markets. The primary challenge involved in conducting a national study would be the identification and recruitment of testing organizations with sufficient

⁵⁵ Tests for discrimination on the basis of race and ethnicity were conducted in-person, and therefore, measures of adverse treatment are not directly comparable to the tests of discrimination against deaf persons using the TTY system.

capacity to recruit disabled testers, provide the necessary accommodations for these testers to work effectively, and manage a large volume of high quality tests.

In addition, pilot testing studies (of roughly 100 tests each) could be conducted in selected metropolitan rental markets to produce rigorous estimates of discrimination against persons who are blind (with or without guide dogs), against persons who are deaf and visit rental properties in person (with or without a sign language interpreter), and against persons with mental illness or with cognitive or developmental disabilities (with or without a companion). All of these testing strategies are feasible and have the potential to identify patterns of discrimination facing persons with disabilities. However, as discussed in Chapter 2, extra time and resources will be necessary to implement them effectively.

The experience from this study also suggests that testing for discrimination against persons with disabilities could effectively be extended to the sales market as well as the rental market. We also recommend further exploratory work focusing on housing for the elderly, including homeowner communities and assisted living and continuing care facilities. However, testing in these types of facilities—which provide both housing and health care—raises additional issues about testers' assigned characteristics and about application procedures.

One of the issues raised by the expert panel of advisors to this study was whether it would be feasible to produce pooled estimates of discrimination against persons with different types of disabilities, rather than separate estimates for each disability type. To the extent that tests focus on differential treatment rather than reasonable modification and accommodation, pooled estimates may be feasible. For example, in the exploratory phase of this study, out of a total of 48 paired tests, 25 (or 52 percent) documented treatment that favored the nondisabled tester over the tester with a disability, while only 1 (or 2 percent) documented treatment that favored the tester with a disability.

Pooling tests in this way has the advantage of providing information that is relevant to more persons with disabilities for the same total number of tests. However, pooling across types of disabilities poses disadvantages as well. First, we do not believe that pooled results can be generated on questions about whether housing providers allow reasonable modification or provide reasonable accommodation, because the modification and accommodation requests differ significantly across types of disabilities. Second, conducting tests across different types of disability is likely to be more costly and time-consuming than conducting the same number of tests of a single type of disability, because of the complexities of recruitment, training, and accommodation.

Implications for Policy and Practice

The high levels of adverse treatment documented in this study call for heightened public education and enforcement. As a first step, results from the pilot phase should be used in a public education campaign to inform housing providers (and other businesses) about the operation of TTY systems and about their importance as a communication tool for persons who are deaf. Refusing to conduct business with a TTY caller effectively slams the door on a customer who is deaf or who has some other communication-related disability. Similarly, results from this study showing a high incidence of adverse treatment against testers using wheelchairs, the refusal of some housing providers to allow reasonable unit modification or provide reasonable parking accommodation should be used to educate housing providers about their obligations under the federal Fair Housing Act.

Paired testing is not only feasible and effective as a research tool, but also as a tool for detection and enforcement. Based upon the experience gained in both the exploratory and pilot phases of this project, HUD should encourage local fair housing and disability rights organizations to conduct more paired testing for discrimination against persons with disabilities. Most local disability testing efforts to date have focused exclusively on issues of reasonable accommodation or reasonable modification. However, the DDS shows that it is possible to conduct paired tests of differential treatment against persons with disabilities, and that inquiries about reasonable modification or accommodation can effectively be appended to rigorous paired research tests without undermining the validity of comparisons to the treatment of nondisabled testers.

Discrimination Against Persons With Disabilities:
Barriers At Every Step

ANNEX A

Expert Panel

**Measuring Discrimination Against People with Disabilities
Expert Panel Meeting
January 13 and 14, 2003**

Panel Members

Michael Allen

Bazelon Center for Mental Health Law
Washington DC

Julie Carter

Kennedy Foundation Fellow
Takoma Park, MD.

Cathy Cloud

Vice President
National Fair Housing Alliance
Washington, DC

Katherine Copeland

Executive Director
Silver State Fair Housing Council
Reno, Nevada

Don Eager

Donald Eager and Associates
Lancaster, Ohio

Fred Freiberg

US Department of Justice
Housing and Civil Enforcement
Washington, DC

Max Lapertosa

Access Living
Chicago, IL

Robert Liston

Director
Montana Fair Housing
Missoula, Montana

Joan Magagna

US Department of Justice
Housing and Civil Enforcement
Washington, DC

Bonnie Milstein

Magar and Milstein
San Francisco, California

Susan Prokop

Associate Advocacy Director
Paralyzed Veterans of America
Washington, DC

Jeff Rosen

General Counsel
National Council on Disability
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Kevin Neary - PDR

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Kimberlee Ross

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Policy Center

ANNEX B

Test Authorization Form (TAF)

and

Advance Call Form

DDS TAF Data Entry Form - Rental Tests

SITECODE:	UI Internal Test Site DDS	Go
WEEK:	0	
CONTROL:	XX-02-0005-D	

TRANSTYPE	Transaction Type	Rental
SITECODE	SITE	UI Internal Test Site DDS
WEEK	Week	0
AD_NO	Ad Number	*****
CONTROL	CONTROL #	XX-02-0005-D
ISSUEDTE	Date of Issuance (mm/dd/yy)	01/01/01
ORGNAME	Organization	UI Internal Test Site DDS
SAMPNAME	Sampler Code	
TESTTYPE	Testing Type	2
SEQUENCE	Required Sequence	Disabled/Non Disabled
NARRATIV	Narrative Required	Yes
UNITYPE	Unit Type	-1
SRCETYPE	Source Type	
ADDATE	Date the Ad appeared (mm/dd/yy)	
SRCENAME	Source Name	-1
EDITION	Edition (if applicable)	
GEOG	Location of Ad (Page, Column, Etc)	

TH01		
ADTEXT	Text of Ad	

TH02		
EDITNAME	Editor Name	
RELEASE	Release this test?	Yes

Enter a [Advance Call](#)

3. If this is a multi-unit building, does it have 4 or fewer units? Yes No
- 3a. If Yes, does the owner live in the building? Yes No
4. What are the office hours (include weekend and evening hours where available)?
-

For In-Person Tests

5. Is it possible to drop in to speak with a housing provider about the available housing?
 Yes (you may drop in) No (you must have an appointment)
- 5a. Verify the address to be visited: _____
-

6. With whom did you speak? _____

7. Is this the final advance call? Yes No
- 7a. If Yes, based on the results of the advance call, is the housing ineligible for any reason?
 Yes No

7b. If Yes, please specify the reason(s) for ineligibility:

- Housing provider could not be reached after repeated attempts
- Telephone number was no longer in service
- Telephone number was incorrect
- No housing available
- Only housing available has 3 or more bedrooms
- Small owner (4 units or fewer)
- Single-Family Home
- Mobile Home
- Seasonal/temporary/vacation/short-term
- Outside of target area
- Exceeds rent limit for target area
- Share situation
- Sublet
- Apartment locator service
- For-Fee Service
- Public/Section 8 housing/LIHTC development
- Housing for older persons

Other (*specify*): _____

8. Comments: _____

ANNEX C

TTY Testing Forms

DDS Test Assignment Form - Rental (Telephone)

header1	Telephone (TTY) Rental Assignment	
SITECODE	SITE	UI Internal Test Site DDS
CONTROL	0 CONTROL #	XX-01-0002-D
SEQUENCE	Tester sequence	2
DISID	DISABILITY ID	Disabled
TESTERID	0 TESTER ID NUMBER	(No Tester Assigned)
ATSTTYPE	0 TYPE OF TEST	rental
AAPPTYPE	0 TYPE OF APPROACH	-1
ADATEV	DATE OF CALL (mm/dd/yy)	
ATIMEV	TIME OF CALL (_ _:_ _)	
ATIMEVM	A.M. P.M. for TIME OF CALL	
header9	TEST SITE	
PPNAME	1 Name of Test site (if known)	*****
header11	Site Address (if known)	
PADDRS	2 street	*****
PCITY	2 city	*****
PSTATE	2 state	*****
PZIP	2 ZIP 00000	*****
Head171	Telephone number(s) of test site:	
PPHN1	3 First Number (000)000-0000	*****
PPHN2	3 Second Number: (000)000-0000	*****
header20	SOURCE OF INFORMATION ON TEST SITE	
SRCENAME	4 Advertisement: Name of source	-1
ADDATE	5 Advertisement: Date of Publication (mm/dd/yy)	
ADTEXT	6 Advertisement: text of ad	
header24	TYPE OF HOUSING TO BE REQUESTED	
PBEDS	7 Number of Bedrooms to be requested	1
PMINBED	7a Minimum number of bedrooms for household	1
PHMTYPR	8 Type of unit	-1
PHNEED	9 Date Housing is Needed (mm/dd/yy)	01/01/01
PHMPRI	10 Price of housing	*****
PHHCOMP	11 Household Composition	Single Adult
APRIR	12 Price Range [Tester may consider units for LESS than this range as well]	1100 to 1300
APREFER	Area Preference (IMPORTANT: DO NOT CITE A NEIGHBORHOOD PREFERENCE)	
AAREAP	13 If you are pressed by the agent, you may state that you are looking in	
header33	Remember: You are open to any areas recommended by the housing provider	
AMOVERR	14 Reason for Moving	

AHEAD55	Other places visited: Just started looking		
header36	ASSIGNED CHARACTERISTICS		
TFNAME	15	Tester Name:	
header38	Tester Address		
TFADD1	16	Tester Address	
TFADD2	16	Tester Address (city/state/zip)	
TVPHONE	17	Voice Mail Number Assigned to Tester (000)000-0000	
header42	Information on Persons in Household		
ARACE1	18	Tester's race	-1
TSEX	18	Tester's gender	-1
AAGE1	18	Tester's age	-1

TH01	Household Income		Gross Annual Income
AINCMON1	19	Tester	4925 59100
AINCMONT	19	Total for Household	4925 59100

TH02			
header73	Employment Information		
AOCC1	20	Tester current occupation	
AEMP1	20	Name of tester's current employer	
AEAD11	20	First line of tester's employer's address	
AEAD12	20	Second line of tester's employer's address	
AELNG1	20	Length of employment at current job	-1
AHEAD21	Credit standing: Excellent, no late payments		
header13	CURRENT HOUSING SITUATION		
AHEAD31	Type of current housing: Rent		
ARENTNOW	21	Amount of Current Rent	1190
ALGNCUR	21	Years at Current Residence	-1
ALEASETP	21	Type of Rental Agreement at Current Residence	
AHEAD61	History of rent payment at current residence: Always on time.		
AHEAD62	Other characteristics: Non-smoking, No pets		
AOTHINFO	22	Other Test Information	
RELEASE		Test Released	Yes

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Disability Discrimination Study – Pilot Phase

TEST INSTRUCTIONS

Scenario: Communication Disability Telephone Differential Treatment

A. **Conducting the Test**

There are some tasks that all DDS testers are expected to complete on every test of a housing provider. These tasks are detailed below and will always be attached to the Test Assignment Form.

- **Review and refer to your test assignment**

You should review your test assignment thoroughly and keep it with you during your telephone call so that you can refer to it if necessary. The housing provider may ask you questions about your personal situation or financial circumstances, and you will need to be prepared to answer them.

- **Call the housing provider in response to the advertised housing. Be persistent when trying to reach the housing provider**

The disabled tester will call the housing provider using a TTY/TDD machine and a relay operator. The non-disabled tester will call the housing provider directly.

You will be required to make five (5) attempts to reach a housing provider within 24 hours. You should call at different times of the day. Never leave a message on an answering machine or with a person who cannot discuss the housing with you. If you cannot reach the housing provider within 24 hours, notify your Test Coordinator.

- **Take Notes**

It is essential that testers **take good notes** during the telephone call. You will need these notes in order to complete the test report forms and narrative after your test has been completed.

- **Inquire about the available rental housing**

You should confirm the availability of rental housing options when you call the housing provider. There is an order or sequence that you should follow in asking about available rental housing.

Step 1

Always inquire about the availability of any rental housing that has the same number of bedrooms as you are assigned. If it is available, express interest in it. Remember, the housing must be within your assigned price range and available when you need it.

Step 2

If no housing is available with the number of bedrooms assigned, inquire about any other rental housing that might meet your needs. Remember, the rental housing must be in your assigned price range and available when you need it, according to your assignment.

If, at any point during the test, a housing provider offers or recommends that you consider a home or apartment, you should express interest in it, provided that the rental housing is (1) within your price range and (2) available for when you need it.

- **Obtain information about the available rental housing**

Testers must express interest in and obtain detailed information about homes or apartments that are suggested by a housing provider during the phone test. Whenever testers are informed about rental housing that meets their needs (i.e., bedroom size, price range and date of availability), it is vital that certain information is obtained about each home or apartment suggested, including the following:

- / **Exact Address (and floor the unit is located on)**
- / **Number of Bedrooms**
- / **Rent Price**
- / **Security Deposit**
- / **Other Fees (if any)**
- / **Length of Lease**
- / **Date of Availability**

Testers may have to ask for some of the information listed above if it is not volunteered by the housing provider.

Also, testers will inquire about the application process and if any fee is required. Testers should also make note of the purpose and amount of any other fees and if those fees would need to be paid at the time of application.

Remember, testers will **never** complete a rental application or formally apply for any rental unit. It is reasonable, however, for a prospective renter to inquire about any application fees that might be required prior to deciding whether to apply for available rental housing.

If the housing provider asks if you would like an application mailed to you, be agreeable and provide your address. However, if the housing provider wants to make an appointment with you to come in to complete an application or view units, say that you are just beginning your housing search and are not interested in doing this at the present time.

IF YOU ARE TOLD ABOUT A WAITING LIST, please follow these simple instructions:

- / Ask how many people are on the waiting list.
- / Ask how long it might take to be offered a unit.

/ Do not ask or agree to put your name on any waiting lists.

- **Obtain the name of the housing provider**

If the housing provider has not volunteered his or her name by the end of your call, please ask for it.

- **Allow the housing provider to suggest any follow-up contact**

Every call that a tester makes to a rental housing provider will come to an end. Testers should not initiate, suggest or offer to make any arrangements for future contact with the housing provider. As a tester, you may thank a housing provider for his or her assistance, but you must refrain from suggesting that you will get back to the housing provider or that the housing provider should contact you. **Please permit the housing provider to suggest any follow-up contact.**

Following are some examples to illustrate how a test might unfold and how you should inquire about housing availability. These examples should NOT be viewed as “scripts” for how you should make your calls, but should serve as a guide on how to conduct the test while adhering strictly to the DDS protocols.

EXAMPLE 1

Advertised Housing: 2-bedroom apartment available June 1st that rents for \$1300.

Tester Assignment: 2 bedroom apartment needed by June 15th. Rent limit is \$1325.

Housing Provider: Hello, Saguaro Apartments.

Tester: Hi, I'm calling about the 2-bedroom apartment for rent. Is it still available?

Housing Provider: No, I just rented that one.

Tester: Do you have any other apartments that would be available by June 15th?

Housing Provider: There is a 2-bedroom unit that should be available by the 15th. It rents for \$1400. And then I will also have a 1-bedroom as well. That will rent for \$1275.

Tester: I'd be interested in the 1- bedroom then. Can you tell me about the unit?

Housing Provider: It's on the 4th floor of the building. The rooms are a nice size and there is plenty of light. The kitchen was updated a couple of years ago. There is laundry on the ground level of the building and an exercise room.

Tester: Do you require a security deposit or any fees for applying?

Housing Provider: The deposit is one month's rent, but there aren't any other fees. We do ask for references though.

Tester: And the apartment is available as of June 15th, right? How long is the lease?

Housing Provider: It's a one year lease usually. Yes, the apartment could be rented for June 15th.

Tester: Thanks for the information. I'm calling about a few places I've seen advertised. What is your name, by the way?

Housing Provider: Felipe. Well, if you want to take a look at it, just stop by.

Tester: Ok. Thanks again.

EXAMPLE 2

Advertised Housing: 2-bedroom apartment available June 1st that rents for \$1300.

Tester Assignment: 2-bedroom apartment needed by June 15th. Rent limit is \$1325.

Disabled tester places call over a TTY/TTD machine via a relay operator.

Housing Provider: Hello, Saguaro Apartments.

Tester: Hi, I'm calling about the 2-bedroom apartment for rent. Is it still available?

Housing Provider: What kind of call is this?

Tester: I'm calling through a relay operator because I can't speak to you directly.

Housing Provider: I'm sorry. I'm not set up to take such a call.

Tester: The relay operator can help us communicate. You don't need anything special on your end to take the call.

Housing Provider: Sorry. I'm just swamped right now and can't take the time.

Tester: Can you tell me if the 2-bedroom apartment is still available?

Housing Provider: No, it's been rented. (hangs up phone)

8. Name of person with whom you spoke: _____
9. When you asked about the availability for the type of rental housing that you were assigned (e.g., one bedroom), what were you told? [*check only ONE box*]
- The rental housing is available when I need it
 - The rental housing is NOT available when I need it
 - The housing provider did not know whether the rental housing was available
 - Something else (*specify*): _____
- 9a. How many units of this type were you told about? _____ Units
10. What were you told about any "other" rental housing ("other" rental housing has a different number of bedrooms than assigned, is within your price range, and is available when you need it)? [*check only ONE box*]
- Other rental housing is available when I need it
 - Other rental housing is NOT available when I need it
 - The housing provider did not know whether other rental housing was available
 - Something else (*specify*): _____
- 10a. How many other units were you told about? _____ Units
11. How many **TOTAL** rental housing units did the housing provider tell you were available? (*Add units from 9a and 10a*) _____ Units
12. Did the housing provider tell you that an application form of some kind must be completed before renting a unit?
- Yes
 - No
- 12a. Did the housing provider invite you to come in and pick up an application or offer to send you one?
- Yes
 - No
- 12b. Did the housing provider tell you that a credit check was part of the application process?
- Yes
 - No

12c. Did the housing provider tell you that a co-signer would be needed as part of the application process?

Yes

No

12d. Did the housing provider tell you that a criminal background check was part of the application process?

Yes

No

13. Did the housing provider request information about your income, source of income or occupation?

Yes

No

If yes, please record what the housing provider said: _____

14. Did the housing provider make any remarks about disability or persons with disabilities?

Yes

No

14a. If Yes, please record what the housing provider said: _____

15. Did the housing provider make any remarks about accessibility or units that were "handicapped" accessible?

Yes

No

15a. If Yes, please record what the housing provider said: _____

16. Did the housing provider make any remarks about race/ethnicity, religion, or families with children?

Yes

No

16a. If Yes, please record what the housing provider said: _____

17. Where you referred to the following during your call?

Assisted living

Nursing home

Group home

Low income housing

Other _____

None

18. What arrangements were made regarding future contact between you and the housing provider [*check all that apply*]?

The housing provider said that he/she would call you back

The housing provider invited you to call him/her back

The housing provider invited you to come in to inspect units/pick up application

Future arrangements were not made

Other (*specify*): _____

19. When was this report completed?

Date (month/day/year): ____/____/____

Day of week: _____

Time: __ __: __ __

AM

PM

Did you receive assistance in completing form? Yes No

If Yes, who assisted you? _____

(print)

11. **FEES** (e.g., pet fee, parking, cleaning, etc.)

<u>Name/Purpose</u>	<u>Amount</u>	<u>When Paid?</u>	<u>How Often?</u>
Application	\$ _____	<input type="checkbox"/> At Application <input type="checkbox"/> After Move in	<input type="checkbox"/> One-time <input type="checkbox"/> Monthly
Security Deposit	\$ _____	<input type="checkbox"/> At Application <input type="checkbox"/> After Move in	<input type="checkbox"/> One-time <input type="checkbox"/> Monthly
_____	\$ _____	<input type="checkbox"/> At Application <input type="checkbox"/> After Move in	<input type="checkbox"/> One-time <input type="checkbox"/> Monthly
_____	\$ _____	<input type="checkbox"/> At Application <input type="checkbox"/> After Move in	<input type="checkbox"/> One-time <input type="checkbox"/> Monthly
_____	\$ _____	<input type="checkbox"/> At Application <input type="checkbox"/> After Move in	<input type="checkbox"/> One-time <input type="checkbox"/> Monthly
_____	\$ _____	<input type="checkbox"/> At Application <input type="checkbox"/> After Move in	<input type="checkbox"/> One-time <input type="checkbox"/> Monthly

11a. Did the housing provider say that any of the above fees were negotiable?

- Yes No

11b. If yes, what did the housing provider say? _____

Waiting List

12. Were you told that there was a waiting list for this unit? Yes No

12a. If Yes, how many people were you told were on the list? _____

12b. If Yes, how long would it take to be offered a unit? _____

12c. If Yes, did the housing provider offer to place your name on the list? Yes No

Financial Incentives / Specials

13. Did the housing provider inform you that you might be able to take advantage of any financial incentives or specials if you decided to apply for and/or rent this unit?

Yes No

13a. If Yes, what were you told? _____

Date form completed: ____ / ____ / ____

Did you receive assistance in completing form? Yes No

Person completing form: _____
(print)

**Disability Discrimination Study
FOLLOW-UP CONTACT FORM**

- COMPLETE ONE FORM FOR EACH CONTACT
- DO NOT USE THIS FORM FOR APPOINTMENT CALLS
- TESTER: NOTIFY TEST COORDINATOR OF ANY CONTACT AND FORWARD MATERIALS RECEIVED

CONTROL # ____ - ____ - ____ - ____ - **D** **TESTER ID #:** ____ - ____ - ____

1. Date and time of contact:
Day of the week: _____
Date: ____ / ____ / ____
Time: ____:____ AM PM

 2. Type of Contact:
 Telephone call to tester at home
 Telephone message left at tester's home
 Voice Mail message retrieved by Test Coordinator
 Postal mail
 E-mail
 Other (*specify*): _____

 3. Name of person making contact: _____

 4. Name of agency (*if given*): _____

 5. What was the stated purpose of the contact? (*check all that apply*)
 Housing provider wanted to see if tester is still interested in renting
 Housing provider wanted to let tester know about more available units
 Housing provider wanted to get more information from tester
 Housing provider wanted to provide information about accommodation/
modification
 Housing provider wanted to thank tester
 Other (*specify*): _____

 6. Describe any materials received: _____
-

ANNEX D

Wheelchair Testing Forms

DDS Test Assignment Form - Rental (In-Person)

header1	In-Person Disability Rental Assignment	
SITECODE	SITE	UI Internal Test Site DDS
CONTROL	0 CONTROL #	XX-02-0002-D
SEQUENCE	Tester sequence	1
DISID	DISABILITY ID	Non Disabled
TESTERID	0 TESTER ID NUMBER	(No Tester Assigned)
ATSTTYPE	0 TYPE OF TEST	rental
AAPPTYPE	0 TYPE OF APPROACH	Drop-In
ADATEV	DATE OF VISIT (mm/dd/yy)	
ATIMEV	TIME OF VISIT (_ _:_ _)	
ATIMEVM	A.M. P.M. for TIME OF VISIT	
header9	TEST SITE	
PPNAME	1 Name of Test site (if known)	*****
header11	Site Address (if known)	
PADDRS	2 street	*****
PCITY	2 city	*****
PSTATE	2 state	*****
PZIP	2 ZIP 00000	*****
Head171	Telephone number(s) of test site:	
PPHN1	3 First Number (000)000-0000	*****
PPHN2	3 Second Number: (000)000-0000	*****
header20	SOURCE OF INFORMATION ON TEST SITE	
SRCENAME	4 Advertisement: Name of source	Third source
ADDATE	5 Advertisement: Date of Publication (mm/dd/yy)	
ADTEXT	6 Advertisement: text of ad	Gatewood Apartments. Studio-\$645, 1BR-\$750. Covered parking available. Cable included! Rent special 1/2 off 1st month rent. Call 1-800-555-7676.
header24	TYPE OF HOUSING TO BE REQUESTED	
PBEDS	7 Number of Bedrooms to be requested	1
PMINBED	7a Minimum number of bedrooms for household	0
PHMTYPR	8 Type of unit	Unfurnished
PHNEED	9 Date Housing is Needed (mm/dd/yy)	04/15/04
PHMPRI	10 Price of housing	*****
PHHCOMP	11 Household Composition	Single Adult
APRIR	12 Maximum Rent Price	800
HEADMOD	Unit Modification (For Disabled Testers Only)	
UNITMOD2	<p>If you are a disabled tester, ask the housing provider for <u>one</u> of the following:</p> <p>-Modify entry</p>	

		-Modify bathroom -Modify switches -Change doorknobs to levers	
HEADACC2		If on-site parking is available, please ask for a parking accommodation. (For Disabled Testers Only)	
APREFER		Area Preference (IMPORTANT: DO NOT CITE A NEIGHBORHOOD PREFERENCE)	
AAREAP	14	If you are pressed by the agent, you may state that you are looking in	
header33		Remember: You are always open to considering any areas recommended by the agent.	
AMOVERR	15	Reason for Moving	
AHEAD55		Other places visited: Just started looking	
header36		ASSIGNED CHARACTERISTICS	
TFNAME	16	Tester Name:	
header38		Tester Address	
TFADD1	17	Tester Address	
TFADD2	17	Tester Address (city/state/zip)	
TVPHONE	17	Voice Mail Number Assigned to Tester (000)000-0000	
header42		Information on Persons in Household	
ARACE1	18	Tester's race	-1
TSEX	18	Tester's gender	-1
AAGE1	18	Tester's age	-1
DISCAUS	18	(For Disabled Testers Only) If asked, please state that your cause of disability is:	

TH01		Household Income	Gross Monthly Income	Gross Annual Income
AINCMON1	18	Tester	3100	37200
AINCMONT	18	Total for Household	3100	37200

THXX			
header73		Employment Information	
AOCC1	19	Tester current occupation	
AEMP1	19	Name of tester's current employer	
AEAD11	19	First line of tester's employer's address	
AEAD12	19	Second line of tester's employer's address	
AELNG1	19	Length of employment at current job	
AHEAD21		Credit standing: Excellent, no late payments	
header13		CURRENT HOUSING SITUATION	
AHEAD31		Type of current housing: Rent	
ARENTHOW	21	Amount of Current Rent	760
ALGNCUR	21	Years at Current Residence	3 years

ALEASETP	22	Type of Rental Agreement at Current Residence	Lease
AHEAD61	History of rent payment at current residence: Always on time		
AHEAD62	Other characteristics: Non-smoking, No pets		
RELEASE		Test Released	Yes

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Disability Discrimination Study – Pilot Phase

TEST INSTRUCTIONS

Scenario: Wheelchair User In-Person Differential Treatment Unit Modification/Parking Accommodation
--

A. Conducting the Test

In DDS, there are only two approaches that testers will make when conducting in-person tests:

- A tester will **drop in** to visit a housing provider in response to an advertisement or listing for available housing;
- or
- A tester will arrive for an **appointment** that was arranged by telephone with the housing provider in response to an advertisement or listing for available housing.

The approach to be made by a tester will be determined by the Test Coordinator and specified on the Test Assignment Form.

There are some tasks that all DDS testers are expected to complete on every test of a housing provider. These tasks are detailed below and will always be attached to the Test Assignment Form.

- **Review your test assignment**

You should review your test assignment thoroughly and make sure you have memorized your characteristics. The housing provider may ask you questions about your personal situation or financial circumstances, and you will need to be prepared to answer them.

- **Take Notes**

It is essential that testers **take good notes** during the test. It is perfectly natural for prospective renters to jot down information about the terms and conditions of renting available homes and apartments during their search for housing. You will need these notes in order to fill out the Test Report Forms after your test has been completed.

- **Inquire about available rental housing**

Even if you have an appointment for your test, you should still confirm the availability of rental housing options when you arrive for your visit. There is an order or sequence that you should follow in asking about available rental housing:

Step 1

Always inquire about the availability of any rental housing that has the same number of bedrooms as you are assigned. If it is available, express interest in it. Remember, the housing must not be over your maximum rent amount and available when you need it.

Step 2

If no housing is available with the number of bedrooms assigned, inquire about any other rental housing that might meet your needs, according to your assignment. It must (1) have at least the minimum number of bedrooms; (2) not be over your maximum rent amount; and (3) be available when you need it.

If, at any point during the test, a housing provider offers or recommends that you consider a home or apartment, you should express interest in it, provided that the rental housing meets your needs according to your assignment.

- **Obtain information about the available rental housing**

Testers must express interest in and obtain detailed information about apartments that are suggested by a housing provider during a test. Whenever testers are informed about rental housing that meets their needs (i.e., bedroom size, price limit and date of availability), it is vital that certain information is obtained about each apartment suggested, including the following:

/ **Exact Address (including unit #)**

/ **Number of Bedrooms**

/ **Rent Amount**

/ **Security Deposit**

/ **Other Fees (if any)**

/ **Length of Lease**

/ **Date of Availability**

/ **Application Process**

Testers may have to ask for some of the information listed above if not volunteered by the housing provider.

When testers inquire about the **application process**, they will ask if any fee is required. Testers should also make note of the purpose and amount of any other fees and if those fees would need to be paid at the time of application. Remember, testers will **never** ask for or complete a rental application or formally apply for any rental unit.

If the housing provider offers you a rental application, you should agree to take one with you and let the housing provider know that you will complete it if you decide later that you want to apply.

- **Ask to inspect any available units**

After you are told about all units that are available that meet your needs, you will then ask to inspect them. You are to try to inspect ALL units that you are told are available. You should also be open to inspecting model units and units that are similar to the ones that are actually available (such as the manager's unit).

- **Be prepared to show your driver's license or other ID**

The housing provider might request to hold your driver's license or other ID or a copy of it for security purposes prior to showing you rental units. Be agreeable to this request. If the housing provider makes a copy of your license, make sure to get it back at the end of your visit.

- **Ask for a Unit Modification** (*Disabled Testers Only*)

If a unit is available and you are able to inspect it, you will ask if you can make a unit modification. You should try to wait until AFTER you have been told about all available units before making this request.

Please follow the order listed below to determine which type of unit modification you should request. You may ask for more than one modification for a specific type, as indicated.

Modification Type 1: **Modify unit entry way** (you may ask for more than one of the following: widen doorway, remove threshold, install ramp, reverse swing of door)

Modification Type 2: **Modify bathroom** (you may ask for more than one of the following: widen doorway, remove cabinets under sink, install grab bars around toilet)

Modification Type 3: **Modify switches** (you should ask for only one of the following: lower thermostat controls, lower light switches)

Modification Type 4: **Modify door handles** (change doorknobs to levers)

If you are unable to inspect an available unit [e.g., tenants still living there, housing provider can't find the key, etc.], you should ask if you can install a grab bar around the toilet area.

- **Ask for a Parking Accommodation** (*Disabled Testers Only*)

If a unit is available and the test site has on-site parking, you will ask if a “handicapped-accessible” parking space can be made available near the unit or building entrance. If the housing provider says that another type of parking space could be made available to you, ask if the space can be made “handicapped accessible.”

- **If you are told about a Waiting List, please follow these instructions:**

/ Ask how many people are on the waiting list.

/ Ask how long it might take to be offered a unit.

/ Do not ask to or agree to put your name on any waiting lists.

- **Obtain the name of the housing provider**

If the housing provider has not volunteered his or her name by the end of your visit, please ask for it.

- **Allow the housing provider to suggest any follow-up contact**

At the conclusion of your test visit, you should NOT initiate, suggest or offer to make any arrangements for future contact with the housing provider. You should simply thank the housing provider for his or her time and assistance, but you **MUST NOT** suggest any kind of follow-up, such as “I will call you when I decide.” Please let the housing provider suggest any follow-up contact.

- **Conduct tester-initiated follow-up, if instructed**

Testers who receive an inconclusive or vague answer to their request for unit modification will be assigned to initiate a follow-up call to the housing

provider. The Test Coordinator will let you know when such a call should be made.

You will make three (3) attempts to make a follow-up call. You will ask to speak to the same housing provider with whom you spoke during your test visit. You will remind the housing provider who you are and what your request was (e.g., widen doorway, install a grab bar, lower light switches, etc.)

Following are some examples to illustrate how a test might unfold and how you should inquire about housing availability, inspection, unit modification, and parking accommodation. These examples should NOT be viewed as “scripts” for how you should conduct your visit, but should serve as a guide to conducting the test while adhering strictly to the DDS protocols.

EXAMPLE 1

Advertised Housing: 1-bedroom apartments from \$480.

Test Assignment: 1-bedroom needed by July 1st. Price limit is \$520.

Tester: Hi, I'm here about the 1-bedroom apartment that was advertised. Is it still available?

Housing Provider: No, I'm sorry, it's just been rented.

Tester: Oh, that's too bad. Would you have anything else available?

Housing Provider: Well, we do have a 2-bedroom, but that's going for \$520. We will have another 1-bedroom August 1st. Would you like to see that one?

Tester: I think I would be interested in the 2-bedroom. I really do need to find a place by July 1st. Would I be able to see that unit right now?

Housing Provider: Sure, it's vacant now. (They enter the unit.) See, we've just painted the whole place and put in new tiling in the bathroom and kitchen.

Tester: It looks nice. What kind of lease is there?

Housing Provider: It's a year lease for the first year and then month-to-month after that. The security deposit is one month's rent.

Tester: Sounds good. What would I need to do to apply if I were interested in this unit?

Housing Provider: You would need to fill out an application and there is a \$25 credit check fee for each person in the household.

Tester: That would be fine. Oh, you know, I would need a grab bar around the toilet area. Would I be able to put one in?

Housing Provider: Well, I don't know. I would have to talk to the owner.

Tester: Okay, maybe you could find out for me. Oh and also, would I be able to get a parking space? I would need it to be handicapped-accessible and close to the building entrance.

Housing Provider: All the units come with an assigned parking space.

Tester: Could the space be made accessible for my van and marked as handicapped?

Housing Provider: No, I'm sorry we couldn't do that.

Tester: Oh, okay, thanks...I'm sorry, what was your name again?

Housing Provider: Uh, Joe. Yeah, okay.

Tester: Thanks, Joe.

EXAMPLE 2

Advertised Housing: 1-bedroom apartments from \$480. (*Building does not have on-site parking.*)

Test Assignment: 1-bedroom needed by July 1st. Price limit is \$520.

Tester: Hi, I'm here about the 1-bedroom apartment that was advertised. Is it still available?

Housing Provider: No, sorry, it's already been rented.

Tester: Well, would you have anything else available July 1st?

Housing Provider: That's the only 1-bedroom we had. I have a 2-bedroom available, but that is going for \$500.

Tester: Well, that's in my price range. Would I be able to take a look at it today?

Housing Provider: Uh, well, the tenants are still in there and I would need to give them 24-hour notice.

Tester: Oh, I see. Well, could you tell me about it then?

Housing Provider: Well, what do you want to know? It's a 2-bedroom on the 3rd floor, the rent is \$500, and the security deposit is the same.

Tester: And what kind of lease is required?

Housing Provider: It's a one-year lease, no exceptions.

Tester: That sounds fine. What would I need to do to if I wanted to apply?

Housing Provider: You would need to fill out an application and there is a \$25 credit check fee for each person in the household. Anything else?

Tester: Well, yes, actually. If there isn't already a grab bar around the toilet, do you think I could be put one in if I decided to rent the place?

Housing Provider: No, that wouldn't be possible. You know, we can't have tenants just putting in anything they wanted. That would just be crazy.

Tester: Okay, then. Thanks very much for your time, I'm sorry what did you say your name was again.

Housing Provider: Joe.

Tester: Thanks, a lot, Joe.

8. If you had an appointment, how many minutes did you wait to meet with someone (i.e. between the time you were greeted by someone when you entered and the time you met with the housing provider?)
_____ minutes
9. When you asked about the availability for the type of rental housing that you were assigned (e.g., one bedroom), what were you told? [*check only ONE box*]
- The rental housing is available when I need it
 - The rental housing is NOT available when I need it
 - The housing provider did not know whether the rental housing was available
 - Something else (*specify*): _____
- 9a. How many units of this type were you told about? _____ Units
10. What were you told about any "other" rental housing ("other" rental housing has a different number of bedrooms than assigned, is within your price range, and is available when you need it)? [*check only ONE box*]
- Other rental housing is available when I need it
 - Other rental housing is NOT available when I need it
 - The housing provider did not know whether other rental housing was available
 - Something else (*specify*): _____
- 10a. How many other units were you told about? _____ Units
11. How many **TOTAL** rental housing units did the housing provider tell you were available? (*Add units from 9a and 10a*) _____ Units
12. Did the housing provider tell you that an application form of some kind must be completed before renting a unit?
- Yes
 - No
- 12a. Did the housing provider ask you to complete an application during your visit or give you an application to take with you?
- Yes
 - No

12b. Did the housing provider tell you that a credit check was part of the application process?

- Yes
- No

12c. Did the housing provider tell you that you would need a co-signer as part of the application process?

- Yes
- No

12d. Did the housing provider tell you that a criminal background check was part of the application process?

- Yes
- No

13. Did the housing provider request information about your income, source of income or occupation?

- Yes
- No

If yes, please record what the housing provider said? _____

14. Were you referred to the following during your visit?

- Assisted living
- Nursing home
- Group home
- Low income housing
- Other: _____
- None

15. Did the housing provider make any remarks about disability or persons with disabilities?

- Yes
- No

15a. If Yes, please record what the housing provider said: _____

16. Did the housing provider make any remarks about accessibility or units that were "handicapped" accessible?
 Yes
 No

16a. If Yes, please record what the housing provider said: _____

17. Did the housing provider make any remarks about race/ethnicity, religion, or families with children?
 Yes
 No

17a. If Yes, please record what the housing provider said: _____

18. Did the housing provider provide you with any of the following items THAT YOU DID NOT ASK FOR?
 Business card
 Brochure
 Floor plan
 Listing of available units
 Lease/Rental Agreement
 Gift
 Other (*specify*): _____

19. What arrangements were made regarding future contact between you and the housing provider [*check all that apply*]?

The housing provider said that he/she would contact you

The housing provider invited you to call him/her

Future arrangements were not made

Other (*specify*): _____

20. When was this report completed?

Date (month/day/year): ____/____/____

Day of week: _____

Time: __ __: __ __ AM PM

Did you receive assistance in completing form? Yes No

If Yes, who assisted you? _____
(print)

UNIT MODIFICATION (for disabled testers only)

Q1. Which modification did you ask to make? (Check one category)

- Modify entry (*check all that apply*)
 - Install ramp
 - Widen doorway
 - Remove threshold
 - Reverse swing of door

- Modify bathroom (*check all that apply*)
 - Widen doorway
 - Remove cabinets under sink
 - Install grab bars around toilet

- Modify switches (check one)
 - Lower thermostat controls
 - Lower light switches

- Change doorknobs to levers

Q2. When you asked the housing provider if you could make the unit modification, what were you told?

- The housing provider said that I could make the unit modification myself and pay for it (answer Q3).

- The housing provider would make the unit modification, but I would have to pay for it (answer Q3).

- The housing provider would make the unit modification at no cost to me (answer Q3).

- The housing provider agreed to make some of the modifications and not others. Please explain: _____

- The housing provider would not allow me to make the unit modification.

- The housing provider had to check with someone else to see if the unit modification could be made.

- The housing provider had to check to see how much the unit modification costs.
- The housing provider did not know if the unit modification could be made, and did not offer to find out.
- Something else: _____

Q3. Did the housing provider tell you that any conditions would be imposed if the unit modification were to be made (e.g., insurance, licensed contractor, waiver of liability, return to original state, extra deposit)?

- Yes
- No

Q3a. If Yes, please describe? _____

PARKING ACCOMMODATION (for disabled testers only)

Q1. When you asked the housing provider if a “handicapped-accessible” parking space could be made available near an available unit / the building entrance, what were you told?

- A “handicapped-accessible” parking space could be made available near an available unit / the building entrance (answer Q2).
- A “handicapped-accessible” parking space could be made available, but not near an available unit / the building entrance (answer Q2).
- A “handicapped-accessible” parking space could NOT be made available.
- There is no “handicapped-accessible” parking.
- The housing provider had to check with someone else to see if a “handicapped-accessible” parking space could be made available.
- The housing provider had to check to see how much the “handicapped-accessible” parking space costs.
- The housing provider did not know if a “handicapped-accessible” parking space could be made available, and did not offer to find out.
- Something else: _____

Q2. Did the housing provider tell you that any conditions would be imposed if the parking accommodation were to be made (e.g., additional cost).

- Yes
- No

Q2a. If Yes, please describe? _____

11. Length of lease? (check all that apply)

- Month-to-month
- Three-month
- Six-month
- One-year
- Two-year
- Other (specify): _____

12. FEES (e.g., pet fee, parking, cleaning, etc.)

<u>Name/Purpose</u>	<u>Amount</u>	<u>When Paid?</u>	<u>How Often?</u>
Application	\$ _____	<input type="checkbox"/> At Application <input type="checkbox"/> After Move in	<input type="checkbox"/> One-time <input type="checkbox"/> Monthly
Security Deposit	\$ _____	<input type="checkbox"/> At Application <input type="checkbox"/> After Move in	<input type="checkbox"/> One-time <input type="checkbox"/> Monthly
_____	\$ _____	<input type="checkbox"/> At Application <input type="checkbox"/> After Move in	<input type="checkbox"/> One-time <input type="checkbox"/> Monthly
_____	\$ _____	<input type="checkbox"/> At Application <input type="checkbox"/> After Move in	<input type="checkbox"/> One-time <input type="checkbox"/> Monthly
_____	\$ _____	<input type="checkbox"/> At Application <input type="checkbox"/> After Move in	<input type="checkbox"/> One-time <input type="checkbox"/> Monthly
_____	\$ _____	<input type="checkbox"/> At Application <input type="checkbox"/> After Move in	<input type="checkbox"/> One-time <input type="checkbox"/> Monthly

12a. Did the housing provider say that any of the above fees were negotiable?

- Yes
- No

12b. If yes, what did the housing provider say? _____

Waiting List

13. Were you told that there was a waiting list for this unit? Yes No

13a. If Yes, how many people were you told were on the list? _____

13b. If Yes, how long would it take to be offered a unit? _____

13c. If Yes, did the housing provider offer to place your name on the list? Yes No

Financial Incentives / Specials

14. Did the housing provider inform you that you might be able to take advantage of any financial incentives or specials if you decided to apply for and/or rent this unit?

Yes No

14a. If Yes, what were you told? _____

Date form completed: ____ / ____ / ____

Did you receive assistance in completing form? Yes No

Person completing form: _____
(print)

Disability Discrimination Study
TESTER-INITIATED FOLLOW-UP FORM

CONTROL # ____ - ____ - ____ - **D** **TESTER ID #:** ____ - ____

1. Phone number called: (____) _____ - _____

2. Date and time of contact:

Day of the week: _____

Date: ____ / ____ / ____

Time: ____:____ AM PM

3. This is call attempt number (*circle*): 1 2 3

4. Was the follow-up call completed?

Yes (*go to Q5*)

No (*check one box below*)

Left message on voice mail, pager, etc.

Left message with person

Told to call back later

No answer

Telephone number no longer in service

Other (*specify*): _____

5. When you asked the housing provider if you could make the unit modification, what were you told?

The housing provider said that I could make the unit modification myself and pay for it.

The housing provider would make the unit modification, but I would have to pay for it.

The housing provider would make the unit modification at no cost to me.

The housing provider would not allow me to make the unit modification.

The housing provider still did not know if I could make the unit modification.

The housing provider said the unit was no longer available.

Something else: _____

6. Comments made by the housing provider: _____

**Disability Discrimination Study
FOLLOW-UP CONTACT FORM**

- COMPLETE ONE FORM FOR EACH CONTACT
- DO NOT USE THIS FORM FOR APPOINTMENT CALLS
- TESTER: NOTIFY TEST COORDINATOR OF ANY CONTACT AND FORWARD MATERIALS RECEIVED

CONTROL # ____ - ____ - ____ - ____ - **D** **TESTER ID #:** ____ - ____ - ____

1. Date and time of contact:
Day of the week: _____
Date: ____ / ____ / ____
Time: ____:____ AM PM

 2. Type of Contact:
 Telephone call to tester at home
 Telephone message left at tester's home
 Voice Mail message retrieved by Test Coordinator
 Postal mail
 E-mail
 Other (*specify*): _____

 3. Name of person making contact: _____

 4. Name of agency (*if given*): _____

 5. What was the stated purpose of the contact? (*check all that apply*)
 Housing provider wanted to see if tester is still interested in renting
 Housing provider wanted to let tester know about more available units
 Housing provider wanted to get more information from tester
 Housing provider wanted to provide information about accommodation/
modification
 Housing provider wanted to thank tester
 Other (*specify*): _____

 6. Describe any materials received: _____
-