

Great Lakes

Special points of interest:

- Learn your Fair Housing Rights
- Energy Saving Tips.
- RHIIP Information.
- Affordable Housing Conference.
- Find more information on the internet.

SPECIAL FEATURE

Fair Housing and Equal Opportunity

Tips on How to Avoid a Housing Discrimination Complaint
By Jeff Jackson, Supervisory Equal Opportunity Specialist

In fiscal year 2003, HUD's Pacific/Hawaii Regional office processed approximately 350 housing discrimination complaints, involving properties in California, Arizona, Nevada and Hawaii. During the same period, the four state and local agencies which process fair housing complaints in the states of California, Arizona, Hawaii, and the city of Phoenix, processed another 835 complaints. The chart below summarizes the number of complaints filed with HUD, and the combined total with the four state and local agencies, by protected group:

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	HUD		State/Local Agencies	
Race:	84	24.2%	288	34.5%
Color:	5	1.4%	22	1.3%
National Origin:	45	12.9%	114	13.7%
Religion:	9	2.6%	12	1.4%
Sex:	27	7.7%	69	8.3%
Handicap:	190	54.4%	307	36.8%
Familial status:	36	10.3%	150	18.0%
Retaliation:	18	5.2%	75	9.0%

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As you can see from the chart, well over one-third of all complaints filed in this region were filed on the basis of handicap or disability. Approximately another third are filed on the bases of race or color of skin. National origin complaints have traditionally comprised about 10% of all complaints filed, but have risen in the years following the World Trade Center disaster.

Retaliation is not a protected class, but fair housing laws provide that an individual who is pursuing his or her fair housing rights and is subjected to acts of discriminatory treatment as a result of that, may file complaints on the basis of retaliation. Note that some state and local fair housing laws include additional protected classes other than the seven listed above. For example, in California it is also unlawful to discriminate on the bases of age, marital status, sexual orientation, or source of income.

Of the above complaints, around 30% have alleged a discriminatory refusal to rent a dwelling or acts which otherwise made a dwelling unavailable. Nearly 40% have alleged discriminatory terms or conditions of tenancy. Over 20% of all complaints alleged issues relating to disabled people alleging denials of reasonable accommodations.

There are commonly held to be five “theories” of discrimination which are either set forth directly in the various federal and state fair housing laws passed over the years, or have evolved through legal interpretation of fair housing laws by the courts. These five are:


1. Overt discrimination: An outright refusal to rent, or differential treatment, based on a person’s membership in a protected class. For example, an apartment manager who refuses to rent to families with children, claiming that the complex has no play

areas and is not a suitable place to house minor children.

2. Differential treatment: Treating residents or applicants who are of one protected class worse than others outside that class are treated. For example, denying tenancy to a Black tenant based on derogatory items in a credit report, while renting to a White applicant with a virtually identical credit report. Or, discouraging a mobility-impaired applicant from pursuing housing in a second-floor apartment because there is no elevator in the building, and the manager is concerned about liability in an emergency.

3. Disparate impact: A facially-neutral rule or policy (i.e., it doesn't make any reference to any particular protected class) but which adversely affects members of one or more protected classes significantly more often than those outside of that class. For example, a numerical occupancy policy which states that no more than one person will occupy a bedroom makes no reference to any protected class. But the policy may have disparate impact on persons with familial status (minor children) because it's much likelier that households of more than two persons will include a minor child than be all adults. As you can probably see, a violation of this theory of discrimination does not require a knowing intent to discriminate.


Quick Quiz... No. 1



Question: Can you list the seven protected classes identified in the Federal Fair Housing Act upon which complaints of housing discrimination may be filed with HUD?

4. Denial of reasonable accommodation or modification: Refusing to make an exception to a standard policy, practice or procedure when the exception is necessary for a disabled person to use and enjoy the housing or services. Refusing to permit the structural modification of a dwelling when such modification is necessary for a disabled person to use and enjoy the housing or services.

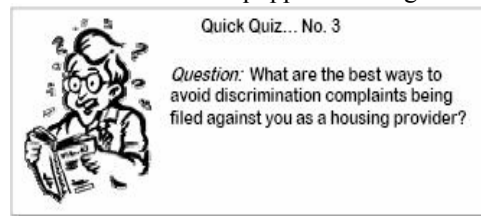
Quick Quiz... No. 2



True or False: It is possible to violate a fair housing law, even though you never intended to discriminate against anyone.

5. Failure to design and construct multifamily housing with certain features of accessible or adaptable design: Section 504 of the Rehabilitation Act of 1973 requires that most federally-subsidized housing built after July 11, 1988 must have accessible common areas, and at least five percent of the housing units must be fully configured for the special needs of mobility-impaired persons. The Federal Fair Housing Act also requires that most multifamily housing of four or more units constructed for first

occupancy after March 11, 1991 contain seven features of accessible design, including accessible common areas, accessible entry doors and interior passageways, Useable kitchens and bathrooms. The Fair Housing Act requirements apply to all ground-floor units of non-elevator buildings, and generally to all units in elevator-equipped buildings.



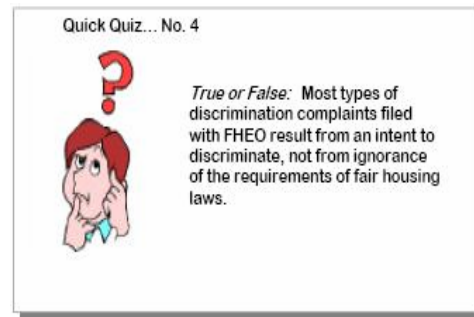
FHEO offers these tips on how to avoid discrimination complaints, based upon its experience in investigating thousands of complaints over the years:

1. Develop and adhere to a detailed, written tenant selection policy. Whether or not you're managing an apartment with HUD subsidy and HUD eligibility criteria, you will avoid complaints if you have a detailed written policy that clearly spells out what the criteria are for approval or rejection of applications, what independent screening is done for each application, who makes final acceptance/rejection decisions, appeal rights, lease violation and eviction policy. Although nobody expects an apartment manager to make robot-like decisions on applications and rules violations, when any of us is left to instinct (in the absence of written policy) we are more subject to

arbitrary or inconsistent decisions. Although inconsistency is not itself a violation of fair housing law, if a complaint is filed and the inconsistencies tend to show members of certain racial groups being rejected or evicted for incidents of misconduct that other races or ethnicities are not rejected or evicted for, discrimination suits can follow.

2. Train your staff on fair housing laws, and conduct periodic refresher training: Many types of discrimination complaints filed with FHEO result from ignorance of the requirements of fair housing laws, not a real intent to discriminate. Managers who steer families with very young children just to ground-floor units where the manager believes they're less likely to be injured may be doing so out of the goodness of their hearts. A trained manager knows to suppress such instinct and inform the family of housing opportunities available, leaving the decision about suitability to the family. As case law develops in the areas of housing discrimination, changes to policy and procedures may have to be undertaken to fully comply with the law. Fair Housing training is available, at a modest cost, from many private fair housing organizations within the region. The training can be provided to one or two people, or to the staff of entire companies. Training can be short, one-hour overview sessions, or half-day interactive hands-on workshops. HUD's Office of Fair Housing is also willing to provide training to larger groups.

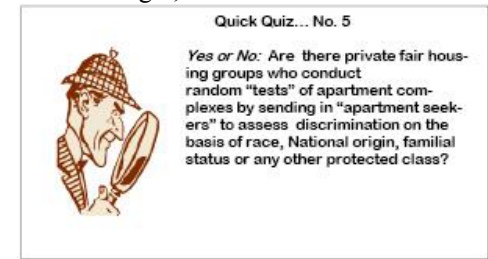
Contact FHEO at 1-800-347-3739 for help in locating a private fair housing group in your area, or to arrange HUD training for your staff.



3. Document your decisions: People who believe they have been subjected to a discriminatory housing practice have up to a year to file a complaint with HUD or a state or local government agency. In most states, individuals have up to two years to file a private lawsuit alleging discrimination. Turnover in complexes operated with rental subsidies tends to be lower than in the conventional marketplace where a third or more of all tenants turn over in a typical year. If a complaint is filed with FHEO or a state or local agency, you will be asked to provide evidence that the actions you took were legitimate, consistent, and nondiscriminatory. You may think you'll never forget that "special" tenant, but twelve months and a dozen special tenants later, will you remember the precise reasons why you evicted someone?

Remember that even in states with no-stated-cause evictions, you will still have to provide an explanation for the actions you took if a discrimination complaint is filed with you. By maintaining careful records of actions you take, especially actions which may be considered adverse, you will be in a better position to defend your decisions if a complaint is filed months later.

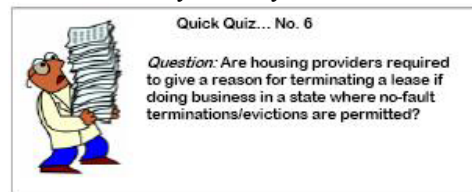
4. Beware that someone may be watching you! Private fair housing groups, some of which receive government subsidy but many which do not, conduct random "tests" of apartment complexes. "Testers" organized by fair housing agencies pose as apartment-seekers, gathering information on availability just as anyone actually searching for housing would. Tests may be conducted to assess discrimination on the basis of race, national origin,



familial status, or any other protected class. In a typical race-based test, a White-race "control" tester may make the first inquiry to establish availability. Successive testers of other races, skin colors, or national origins may follow. Testing results are analyzed by private fair housing agencies,

and if revealing evidence of differential treatment adverse to one or more protected classes, may file “agency-based” complaints with HUD. HUD recognizes that apartment managers aren’t robots or computers, and that some differences can be attributed to things other than protected class. Do your best to give consistent information about current and future availability of apartments, and this means having the information written down, so that every rental agent and manager will give the same information to each prospect.

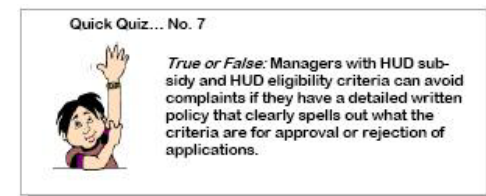
5. Be courteous to all, but not too friendly with anyone. Managing an apartment complex as if you were managing a retail business where you really



want and need satisfied, repeat customers is also a way to avoid discrimination complaints. Many complaints are filed based upon perception that the management treats other tenants—who may only happen to be of other protected classes—better. Avoid becoming too friendly with any tenant or group of tenants, since being an effective manager sometimes means having to make hard or unpopular decisions. Sharing detailed information with any one tenant about who’s getting new carpeting or a bathroom remodeled is information

which you lose control of once it leaves your office, and spreads inconsistently and erratically around the complex through word-of-mouth. Most fair housing complaints alleging differential treatment stem from incomplete knowledge of management’s actual policies, and are often fueled by tenants too friendly with management, and who have gained access to what should be held as proprietary information. Keep specifics of the management of the complex to yourself.

6. Respond quickly and effectively to reasonable accommodations requests: As noted in the statistics above, denials of reasonable accommodation cases comprise nearly 20% of all housing discrimination complaints filed in this region, amounting to several hundred complaints a year. In an article in the September newsletter, we’ve reviewed the ways to analyze a reasonable accommodations request, and to respond to it. It is especially important, after receiving a reasonable accommodation request, to acknowledge receipt of it and to let the



requester know when you expect to be able to make a decision. It is a good idea to verify the disabling condition and need for

accommodation with the requester's health care provider, in writing. Remember that delaying action on a request may be considered tantamount to denial, particularly if there is urgent need. If you can't grant the specific accommodation requested because it creates an undue burden, do continue your dialogue with the requester to see if you can find an alternative, equally-effective but less-burdensome accommodation to offer instead.

7. Call HUD if you have a question or just need to talk something out. If there's one thing that bureaucrats are good at, it's quoting regulations and handbooks! If you're not quite sure what to do about a bad tenant, or a shaky applicant, then call FHEO or send an e-mail message, and talk the problem out with us. Our many years of experience in dealing with housing management issues and fair housing complaints will provide useful perspective to you in crafting your final decisions.

SHARE THE GOOD NEWS...

This newsletter is sent to our industry partners, which include: Lenders, Developers, Management Agents, Property Owners, Consultants, Government Officials, Project Site Offices, etc. The residents of the developments have advised they are interested in the information in the newsletter. We request that the copy sent to the project site be posted in the community room, on a bulletin board or somehow shared with the residents. Residents could also be advised that the newsletter is on our website, (www.hud.gov/local/index.cfm?state=mi) should they want to view it on their computer or in your Neighborhood Network location.

Things you should know

If there is a change of personnel, such as on-site manager or management company, HUD should be informed.

HUDCLIPS has the newest forms available for managers:
www.hudclips.org

Answers to the FHEO Quiz Questions

Question 1: Race, color, religion, sex, national origin, familial status, and disability. The California state fair housing law also includes four additional protected classes, which are: age, marital status, sexual orientation, and source of income.

Question 2: True. Violations of the law under the “overt” and “differential treatment” theories of discrimination usually establish an intent to discriminate. However, “disparate impact” cases involve policies and procedures which are facially neutral (i.e., do not make reference to any protected class) but which have the effect, even if unintended, of denying housing to people in a certain protected class housing more often than others who are outside of that protected class.

Question 3: The overall answer is to endeavor to treat equally qualified people the same, regardless of their membership in any protected class. In practical terms, HUD believes that one of the best ways to ensure consistency in treatment is by having and abiding written application and tenancing policies, to ensure that actual practices are uniformly applied. Keeping files documenting the reasons for your decisions is also a good practice. And periodic refresher training to staff on your policies, and applicability of fair housing laws, will also help to avoid actions likely to result in complaints.

Question 4: True. The Supreme Court has determined that, under certain circumstances, a fair housing agency which has undertaken tests which reveal evidence of discrimination may file a complaint with HUD or pursue a lawsuit of discrimination, even where the agency has only its testers and no “bona fide” apartment seeker, to testify as to the incidents.

Question 5: Answer: Although tenant-landlord laws of a state may permit no-fault terminations, if a complaint of housing discrimination is filed with HUD (or a state or local fair housing agency), a housing provider will have to provide to HUD a legitimate, nondiscriminatory reason for the actions justifying the termination or non-renewal. HUD will investigate to determine if the reasons for termination or non-renewal are non-discriminatory and consistent, i.e., whether any tenant regardless of race, color, national origin or other protected class as alleged would have also been terminated for these reasons.

Question 6: Yes. Even the states with no-stated-cause evictions, an explanation must be provided.

Question 7: True.

RHIIP and You

The Rental Housing Integrity Improvement Program (RHIIP) recently published a brochure, RHIIP and You. The brochure was developed to assist in informing tenants, property owners, management agents, etc., about the RHIIP initiative. The brochure is being sent to all HUD field offices and will be used to market RHIIP at meetings, visits to projects, industry meetings, etc.

RHIIP information sheets are also available. There are separate information sheets for owners and agents, tenants, contract administrators, and HUD staff. These information sheets as well as other information concerning the RHIIP initiative are available on RHIIP's website at <http://www.hud.gov/offices/hsg/mfh/rhiip/mfhrhiip.cfm>

RHIIP Newsletter

HUD for the past year, has published, on a quarterly basis, a RHIIP Newsletter that is available on the RHIIP website and in a printed version. The RHIIP Newsletter informs HUD staff, owners, management agents, contract administrators and other interested parties of important RHIIP issues such as income matching with the New Hires data base, results of RHIIP error measurement studies and new rent and income determinations.

For examples of previous articles, you can look at past editions of the RHIIP Newsletter at:
<http://www.hud.gov/offices/hsg/mfh/rhiip/mfhrhiip.cfm>.

On the web

This newsletter is available on the internet at

<http://www.hud.gov/local/mi/working/localpo/mfhsg.cfm>

10 Low Cost or No Cost Energy Saving Tips that can Reduce your Monthly Energy Bills



Tip #1 – Upgrade your lighting - replace T12 fixtures with more efficient T8 fixtures. Make sure that maintenance staff understand that T12 lamps use magnetic ballasts, while T8 lamps use the more efficient electronic ballasts. Using the wrong lamp with the wrong ballast may compromise the performance of both the lamp and the ballast.



Tip #2 – Many lighting retrofits can be self-installed. Compact fluorescent lamps (CFL) can replace incandescent lamps in most common areas, including hallways, stairways, garages, and lobbies. CFL torchieres are also a great alternative to energy wasting halogen lamps.



Tip #3 – There are several lower cost options that will help improve the efficiency of your service hot water system. Make sure that the recirculation loop has controls that regulate temperatures based on demand and that the service hot water Recirculation loop pumps are turned off if the length from the water heater to a water tap is less than 100 feet. Also make sure that your boilers have controls that are well maintained and functioning. Of course – upon failure – remember to replace the boiler or service hot water heater with an energy-efficient system.



Tip #4 – Encourage maintenance staff to insulate boilers and pipes properly. Boilers and pipes without insulation or with improper insulation such as masking tape can lead to higher energy bills.



Tip #5 – Inspect and clean vents, fans, filters, and ducts annually and during each tenant complaint. Blockage and leaks in the HVAC system can dramatically increase energy use for heating and cooling. It pays to inspect/repair regularly.



Tip #6 – When replacing, replace toploading machines with horizontal-axis (front-loading) machines. Horizontal-axis machines are more energy efficient and have greater accessibility for tenants.



Tip #7 – Encourage operations and maintenance staff to keep detailed maintenance logs. These logs help identify problem areas in the building, highlight recurring problems, and track maintenance activities. A major part of a building's cost savings is ensuring that operations and maintenance activities are both thorough and responsive. Keeping detailed maintenance logs



Tip #8 – When buildings do undergo energy efficiency improvements, it is important that maintenance staff commission and inspect the work to ensure that it was completed properly.



Tip #9 – Track your monthly energy bills so you can compare usage and costs over time. A free tracking tool is available through ENERGY ACTION. It is also helpful to work with contractors who are familiar with energy efficient technologies and have worked in multifamily housing.



Tip #10 – Everyone from tenants to property managers need to be involved in energy efficiency activities. Buildings are complex systems, and reducing energy costs requires broad cooperation. By improving the overall energy efficiency of your building you can:

- Reduce tenant complaints
- Encourage more efficient operations and maintenance
- Improve your bottom line
- Extend the life of the building, equipment, and grounds

Issuances

Notice 04-22, Disaster Recovery Guidance by Multifamily Housing After a Presidentially-Declared Disaster

Notice 2004-20, Reinstatement and Extension of HUD Notice 3-17, Guidelines for Continuation of Interest Reduction Payments after Refinancing: Decoupling,” Under Section 236 (e)(2) and Refinancing of Insured Section 236 Projects into Non-Insured Section 236(b) Projects

Notice H 04-21, Amendments to Notice H 2002-16: Underwriting Guidelines for Refinancing of Section 202 and 202/8 direct loan prepayments

Notice 2004-19, Extension of the Teacher Next Door (TND) Initiative

Federal Register, October 1, 2004, Fair Market Rents for the Housing Choice Voucher Program and Moderate Rehabilitation Single Room Occupancy Program Fiscal Year 2005; Notice

Federal Register, November 26, 2004, Reinvention of the Sections 514, 515, 516, and 521 Multi-Family Housing Programs; Interim Rule

Federal Register, November 26, 2004, Notice of Funding Availability for the Section 202 Demonstration Planning Grant Program

Federal Register November 29, 2004, Privacy Act of 1974; Notice of Matching Program; Matching Tenant Data in Assisted Housing Programs

Federal Register, November 30, 2004, Statutorily Mandated Designation of Difficult Development Areas for Section 42 of the Internal Revenue Code of 1986; Notice

NOFA and new Dun & Bradstreet requirement

The 2005 Super Notice of Funding Availability (NOFA) for Housing and Community Development Grant Programs will be announced in the Federal Register in the very near future.

The Federal Government has recently adopted a new policy that requires organizations to obtain a DUNS Number from Dun & Bradstreet and register with the Central Contractor Registration prior to submitting a grant application or proposal to any federal agency. These numbers must be included on all grant application packages.

You must attain the DUNS Number prior to registering with the Central Contractor Registry. DUNS numbers may be obtained by calling Dun & Bradstreet's special toll-free number for federal grant applicants: 1-866-705-5711. The process to request a DUNS Number takes about 10 minutes and is free of charge. The request must come from an authorized official of the organization, not a project director, or management agent. When you call, tell the operator that you are applying to a federal grant program and need to register for a DUNS Number. You will be asked to provide the following information (subject to minor changes):

Legal Name of the organization, physical address (and P.O. Box if you have one), telephone number, web address, name of the authorizing official (e.g., President, Owner, etc.), the purpose of your organization and total number of employees.

You may also register for a DUNS Number via D&B's website at <https://eupdate.dnb.com/requestoptions.html>.

Choose the "DUNS Number only" option. Please note that registration via the website may take up to 30 business days to complete.

For details on the information to gather before you register for the Central Contractors Registry please visit their website at: <http://www.ccr.gov>

If you have the necessary information on hand, the on-line registration takes approximately 30 minutes to complete, depending on the size and complexity of your organization.

We also suggest that you visit the HUD website regularly at www.hud.gov for any news releases and program updates.

Neighborhood Networks

By

Pamela M. Wildfong

Detroit has been selected by HUD's Neighborhood Networks (NN) contractor, BCT Partners, to receive a series of consortium building seminars and meetings. BCT Partners helped NN centers in other states develop consortia last year. As a NN coordinator, I expressed our interest in consortium development at the 2004 NN National Conference.

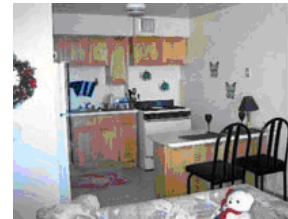
A consortium is a group of NN centers in the same geographic region that collaborate to expand opportunities for their users. Some consortia are independent organizations with their own staff. Others are informal groups of centers that meet periodically to exchange ideas and information. Consortia bring many benefits to its members: shared resources, access to funding opportunities and partnerships, networking, and joint programming.

A big part of consortium development rests in getting centers to let go of the idea that they are competing with each other for support. Many centers keep their successes to themselves, as they don't want to find themselves competing with another center for the attention of a grantee or business partner. We want centers to realize that there is strength in numbers. Many grantees and potential partners are changing the way they view the NN initiative, and are actually looking to collaborative efforts. They want people working together – it's better for everyone!

Michigan Decoupling Team Tackles Red Tape

The Michigan Multifamily Hub has put together a special “preservation” team to speed up decoupling under the Section 236 Program — a process allowing for refinancing of HUD-subsidized mortgages to take advantage of lower interest rates with the debt-service savings applied to property improvements.

“The result has been a steady volume of decoupling deal approvals that directly benefit the owners and residents as well as MSHDA (Michigan Housing Development Authority) and local communities,” said Bob Brown, Former Director of the Michigan Multifamily Hub.



A kitchen recently remodeled after a Section 236 decoupling deal in Michigan.

Twelve recent deals were done jointly with MSHDA, which held the original Section 236 non-insured mortgages, in a relatively short period (between June 2002 and July 2004). These 12 deals involved the rehabilitation of 1,734 units at an average cost of \$12,500 per unit. The average use restriction is 15 years, resulting in residents having at least 15 more years of affordable rents as well as enjoying the benefits of renovated units because of decoupling.

Under the Section 236 Program, set up in 1968 as a precursor to the Section 8 subsidy program, HUD provides owners of multifamily housing for low- and moderate-income residents with a monthly Interest Reduction Payment (IRP), a subsidy reducing the effective mortgage interest rate to as little as 1 percent. Decoupling refinance agreements include restrictions that require the renovated communities remain low-income housing for a set period a time.

The Michigan preservation team’s efficiency combined with Section 236 policy changes in 2000 and falling interest rates led to a sudden demand for such win-win deals over the past three or so years.

“We needed to combine the expertise of production and asset management to focus on re-underwriting HUD-subsidized projects, so we set up a new group, which we call the preservation team,” Mr. Brown said. “This team specializes in handling the complex interactions between subsidy program requirements and underwriting feasibility considerations, which must be understood and accounted for in order to make deals work.”

Under the Michigan Multifamily Hub’s team approach, property owners send in decoupling applications to the team leader in the Grand Rapids Field Office who coordinates the review process. The review team is composed of both development and asset management staff members as well as legal counsel.

The review process is broken into several areas: regulatory items, financial review, comparability study or appraisal review, physical improvements and legal documents. Each team member has primary duties related to one of these tasks and can also review any of the other areas he/she deems appropriate. The team completes a field inspection of each owner's proposed rehabilitation on every application as well as a site review of the appraisal/completion study, if appropriate. Once the decoupling application has been approved, the team's legal counsel executes the legal documents and completes the transaction.

Affordable Housing Conference

The annual affordable housing conference will be held May 16th-18th at the Lansing Center in Lansing Michigan. This conference will cover a wide variety of programs that are available for promoting and sustaining affordable housing. The Department of Housing and Urban Development is pleased to announce that May 18th will offer a full day of training on preserving or recapitalizing existing multifamily properties. Participants registering for this track will be offered the opportunity to speak with HUD, MSHDA and Farmer's Home staff. We will have a variety of sessions including 202 prepayment, Refinancing using HUD and MSHDA programs, impact of refinancing on Section 8 contracts, refinancing using Tax Credits, Decoupling of existing 236 properties and a Question and Answer session. We are pleased to announce that we will be joined by Beverly Miller, Director of Asset Management, from HUD HQ. To receive further information about this training opportunity, you can go to the following website: www.housingconference.org. We hope to see you there at this important event.

On the web

This newsletter is available on the internet at

<http://www.hud.gov/local/mi/working/localpo/mfhsg.cfm>

Housing and Urban Development

HUD's mission is to increase homeownership, support community development and increase access to affordable housing free from discrimination. To fulfill this mission, HUD will embrace high standards of ethics, management and accountability and forge new partnerships—particularly with faith-based and community organizations—that leverage resources and improve HUD's ability to be effective on the community level.

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