



May 21st 2025

To Whom it May Concern,

Attached you will find the AFHMP and supporting documentation for Pulaski Place. Please note, the plan may not be completed in its entirety at this time since the community is currently under development.

The following information is missing and will be updated once we get closer to opening the community:

- Picture of site signage (example of construction sign is attached)
- Grace Hill Fair Housing Certificates – All team members are required to take and pass Fair Housing Training through Grace Hill, however, since we do not have anyone working at the property at this time, we are unable to provide certificates. The fair housing coursebook is included in the accompanying documentation.
- As we don't have any residents yet, Section 3b in Worksheets 1, 3, and 4 were completed using area demographic data.

Should you have any questions, please feel free to contact me.

Sincerely,

Angie Lombardi

VP of Marketing

alombardi@tfjgroup.com

757-351-6518

Note to all applicants/respondents: This form was developed with Nuance, the official HUD software for the creation of HUD forms. HUD has made available instructions for downloading a free installation of a Nuance reader that allows the user to fill-in and save this form in Nuance. Please see <http://portal.hud.gov/hudportal/documents/huddoc?id=nuancereaderinstall.pdf> for the instructions. Using Nuance software is the only means of completing this form.

Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing

U.S. Department of Housing
and Urban Development
Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0013
(exp.1/31/2021)

1a. Project Name & Address (including City, County, State & Zip Code)	1b. Project Contract Number	1c. No. of Units
	1d. Census Tract	
	1e. Housing/Expanded Housing Market Area	

1f. Managing Agent Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address

1g. Application/Owner/Developer Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address

1h. Entity Responsible for Marketing (check all that apply)

Owner Agent Other (specify)

Position, Name (if known), Address (including City, County, State & Zip Code), Telephone Number & Email Address

1i. To whom should approval and other correspondence concerning this AFHMP be sent? Indicate Name, Address (including City, State & Zip Code), Telephone Number & E-Mail Address.

2a. Affirmative Fair Housing Marketing Plan

Plan Type

Date of the First Approved AFHMP:

Reason(s) for current update:

2b. HUD-Approved Occupancy of the Project (check all that apply)

Elderly

Family

Mixed (Elderly/Disabled)

Disabled

2c. Date of Initial Occupancy

2d. Advertising Start Date

Advertising must begin *at least* 90 days prior to initial or renewed occupancy for new construction and substantial rehabilitation projects.

Date advertising began or will begin

For existing projects, select below the reason advertising will be used:

To fill existing unit vacancies

To place applicants on a waiting list (which currently has individuals)

To reopen a closed waiting list (which currently has individuals)

3a. Demographics of Project and Housing Market Area

Complete and submit Worksheet 1.

3b. Targeted Marketing Activity

Based on your completed Worksheet 1, indicate which demographic group(s) in the housing market area is/are *least* likely to apply for the housing without special outreach efforts. (check all that apply)

White	American Indian or Alaska Native	Asian	Black or African American
Native Hawaiian or Other Pacific Islander		Hispanic or Latino	Persons with Disabilities
Families with Children	Other ethnic group, religion, etc. (specify)		

4a. Residency Preference

Is the owner requesting a residency preference? If yes, complete questions 1 through 5.

If no, proceed to Block 4b.

(1) Type

(2) Is the residency preference area:

The same as the AFHMP housing/expanded housing market area as identified in Block 1e?

The same as the residency preference area of the local PHA in whose jurisdiction the project is located?

(3) What is the geographic area for the residency preference?

(4) What is the reason for having a residency preference?

(5) How do you plan to periodically evaluate your residency preference to ensure that it is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a)?

Complete and submit Worksheet 2 when requesting a residency preference (see also 24 CFR 5.655(c)(1)) for residency preference requirements. The requirements in 24 CFR 5.655(c)(1) will be used by HUD as guidelines for evaluating residency preferences consistent with the applicable HUD program requirements. See also HUD Occupancy Handbook (4350.3) Chapter 4, Section 4.6 for additional guidance on preferences.

4b. Proposed Marketing Activities: Community Contacts

Complete and submit Worksheet 3 to describe your use of community contacts to market the project to those least likely to apply.

4c. Proposed Marketing Activities: Methods of Advertising

Complete and submit Worksheet 4 to describe your proposed methods of advertising that will be used to market to those least likely to apply. Attach copies of advertisements, radio and television scripts, Internet advertisements, websites, and brochures, etc.

5a. Fair Housing Poster

The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Check below all locations where the Poster will be displayed.

Rental Office	Real Estate Office	Model Unit	Other (specify)
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5b. Affirmative Fair Housing Marketing Plan

The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check below all locations where the AFHMP will be made available.

Rental Office	Real Estate Office	Model Unit	Other (specify)
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5c. Project Site Sign

Project Site Signs, if any, must display in a conspicuous position the HUD approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Check below all locations where the Project Site Sign will be displayed. Please submit photos of Project signs.

Rental Office	Real Estate Office	Model Unit	Entrance to Project	Other (specify)
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The size of the Project Site Sign will be x

The Equal Housing Opportunity logo or slogan or statement will be x

6. Evaluation of Marketing Activities

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting individuals least likely to apply, how often you will make this determination, and how you will make decisions about future marketing based on the evaluation process.

7a. Marketing Staff

What staff positions are/will be responsible for affirmative marketing?

7b. Staff Training and Assessment: AFHMP

- (1) Has staff been trained on the AFHMP?
- (2) Has staff been instructed in writing and orally on non-discrimination and fair housing policies as required by 24 CFR 200.620(c)?
- (3) If yes, who provides instruction on the AFHMP and Fair Housing Act, and how frequently?

- (4) Do you periodically assess staff skills on the use of the AFHMP and the application of the Fair Housing Act?
- (5) If yes, how and how often?

7c. Tenant Selection Training/Staff

- (1) Has staff been trained on tenant selection in accordance with the project's occupancy policy, including any residency preferences?

- (2) What staff positions are/will be responsible for tenant selection?

7d. Staff Instruction/Training:

Describe AFHM/Fair Housing Act staff training, already provided or to be provided, to whom it was/will be provided, content of training, and the dates of past and anticipated training. Please include copies of any AFHM/Fair Housing staff training materials.

8. Additional Considerations Is there anything else you would like to tell us about your AFHMP to help ensure that your program is marketed to those least likely to apply for housing in your project? Please attach additional sheets, as needed.

9. Review and Update

By signing this form, the applicant/respondent agrees to implement its AFHMP, and to review and update its AFHMP in accordance with the instructions to item 9 of this form in order to ensure continued compliance with HUD's Affirmative Fair Housing Marketing Regulations (see 24 CFR Part 200, Subpart M). I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (See 18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Signature of person submitting this Plan & Date of Submission (mm/dd/yyyy)

Name (type or print) *Jeff Hibbard* *05/21/2025*

Title & Name of Company

For HUD-Office of Housing Use Only

Reviewing Official:

For HUD-Office of Fair Housing and Equal Opportunity Use Only

Approval

Disapproval

Signature & Date (mm/dd/yyyy)

Signature & Date (mm/dd/yyyy)

Name
(type
or
print)

Title

Name
(type
or
print)

Title

Public reporting burden for this collection of information is estimated to average six (6) hours per initial response, and four (4) hours for updated plans, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget (OMB) control number.

Purpose of Form: All applicants for participation in FHA subsidized and unsubsidized multifamily housing programs with five or more units (see 24 CFR 200.615) must complete this Affirmative Fair Housing Marketing Plan (AFHMP) form as specified in 24 CFR 200.625, and in accordance with the requirements in 24 CFR 200.620. The purpose of this AFHMP is to help applicants offer equal housing opportunities regardless of race, color, national origin, religion, sex, familial status, or disability. The AFHMP helps owners/agents (respondents) effectively market the availability of housing opportunities to individuals of both minority and non-minority groups that are least likely to apply for occupancy. Affirmative fair housing marketing and planning should be part of all new construction, substantial rehabilitation, and existing project marketing and advertising activities.

An AFHM program, as specified in this Plan, shall be in effect for each multifamily project throughout the life of the mortgage (24 CFR 200.620(a)). The AFHMP, once approved by HUD, must be made available for public inspection at the sales or rental offices of the respondent (24 CFR 200.625) and may not be revised without HUD approval. This form contains no questions of a confidential nature.

Applicability: The form and worksheets must be completed and submitted by all FHA subsidized and unsubsidized multifamily housing program applicants.

INSTRUCTIONS:

Send completed form and worksheets to your local HUD Office, Attention: Director, Office of Housing

Part 1: Applicant/Respondent and Project

Identification. Blocks 1a, 1b, 1c, 1g, 1h, and 1i are self-explanatory.

Block 1d- Respondents may obtain the Census tract number from the U.S. Census Bureau (<http://factfinder2.census.gov/main.html>) when completing Worksheet One.

Block 1e- Respondents should identify both the housing market area and the expanded housing market area for their multifamily housing projects. Use abbreviations if necessary. A **housing market area** is the area from which a multifamily housing project owner/agent may reasonably expect to draw a substantial number of its tenants. This could be a county or Metropolitan Division. The U.S. Census Bureau provides a range of levels to draw from.

An **expanded housing market area** is a larger geographic area, such as a Metropolitan Division or a Metropolitan Statistical Area, which may provide additional demographic diversity in terms of race, color, national origin, religion, sex, familial status, or disability.

Block 1f- The applicant should complete this block only if a Managing Agent (the agent cannot be the applicant) is implementing the AFHMP.

Part 2: Type of AFHMP

Block 2a- Respondents should indicate the status of the AFHMP, i.e., initial or updated, as well as the date of the first approved AFHMP. Respondents should also provide the reason (s) for the current update, whether the update is based on the five-year review or due to significant changes in project or local demographics (See instructions for Part 9).

Block 2b- Respondents should identify all groups HUD has approved for occupancy in the subject project, in accordance with the contract, grant, etc.

Block 2c- Respondents should specify the date the project was/will be first occupied.

Block 2d- For new construction and substantial rehabilitation projects, advertising must begin at least 90 days prior to initial occupancy. In the case of existing projects, respondents should indicate whether the advertising will be used to fill existing vacancies, to place individuals on the project's waiting list, or to re-open a closed waiting list. Please indicate how many people are on the waiting list when advertising begins.

Part 3 Demographics and Marketing Area.

"Least likely to apply" means that there is an identifiable presence of a specific demographic group in the housing market area, but members of that group are not likely to apply for the housing without targeted outreach, including marketing materials in other languages for limited English proficient individuals, and alternative formats for persons with disabilities. Reasons for not applying may include, but are not limited to, insufficient information about housing opportunities, language barriers, or transportation impediments.

Block 3a - Using Worksheet 1, the respondent should indicate the demographic composition of the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area. The applicable housing market area and expanded housing market area should be indicated in Block 1e. Compare groups within rows/across columns on Worksheet 1 to identify any under-represented group(s) relative to the surrounding housing market area and expanded housing market area, i.e., those group(s) "least likely to apply" for the housing without targeted outreach and marketing. If there is a particular group or subgroup with members of a protected class that has an identifiable presence in the housing market area, but is not included in Worksheet 1, please specify under "Other."

Respondents should use the most current demographic data from the U.S. Census or another official source such as a local government planning office. Please indicate the source of your data in Part 8 of this form.

Block 3b - Using the information from the completed Worksheet 1, respondents should identify the demographic group(s) least likely to apply for the housing without special outreach efforts by checking all that apply.

Part 4 - Marketing Program and Residency Preference (if any).

Block 4a - A residency preference is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). Respondents should indicate whether a residency preference is being utilized, and if so, respondents should specify if it is new, revised, or continuing. If a respondent wishes to utilize a residency preference, it must state the preference area (and provide a map delineating the precise area) and state the reason for having such a preference. The respondent must ensure that the preference is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a) (see 24 CFR 5.655(c)(1)).

Respondents should use Worksheet 2 to show how the percentage of the eligible population living or working in the residency preference area compares to that of residents of the project, project applicant data, census tract, housing market area, and expanded housing market area. The percentages would be the same as shown on completed Worksheet 1.

Block 4b - Using Worksheet 3, respondents should describe their use of community contacts to help market the project to those least likely to apply. This table should include the name of a contact person, his/her address, telephone number, previous experience working with the target population(s), the approximate date contact was/will be initiated, and the specific role the community contact will play in assisting with affirmative fair housing marketing or outreach.

Block 4c - Using Worksheet 4, respondents should describe their proposed method(s) of advertising to market to those least likely to apply. This table should identify each media option, the reason for choosing this media, and the language of the advertisement. Alternative format(s) that will be used to reach persons with disabilities, and logo(s) that will appear on the various materials (as well as their size) should be described.

Please attach a copy of the advertising or marketing material.

Part 5 – Availability of the Fair Housing Poster, AFHMP, and Project Site Sign.

Block 5a - The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Respondents should indicate all locations where the Fair Housing Poster will be displayed.

Block 5b -The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check all of the locations where the AFHMP will be available.

Block 5c -The Project Site Sign must display in a conspicuous position the HUD-approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Respondents should indicate where the Project Site Sign will be displayed, as well as the size of the Sign and the size of the logo, slogan, or statement. **Please submit photographs of project site signs.**

Part 6 - Evaluation of Marketing Activities.

Respondents should explain the evaluation process to be used to determine if they have been successful in attracting those individuals identified as least likely to apply. Respondents should also explain how they will make decisions about future marketing activities based on the evaluations.

Part 7- Marketing Staff and Training.

Block 7a -Respondents should identify staff positions that are/will be responsible for affirmative marketing.

Block 7b - Respondents should indicate whether staff has been trained on the AFHMP and Fair Housing Act.

Please indicate who provides the training and how frequently. In addition, respondents should specify whether they periodically assess staff members' skills in using the AFHMP and in applying the Fair Housing Act. They should state how often they assess employee skills and how they conduct the assessment.

Block 7c - Respondents should indicate whether staff has been trained on tenant selection in accordance with the project's occupancy policy, including residency preferences (if any). Respondents should also identify those staff positions that are/will be responsible for tenant selection.

Block 7d - Respondents should include copies of any written materials related to staff training, and identify the dates of past and anticipated training.

Part 8 - Additional Considerations.

Respondents should describe their efforts not previously mentioned that were/are planned to attract those individuals least likely to apply for the subject housing.

Part 9 - Review and Update.

By signing the respondent assumes responsibility for implementing the AFHMP. Respondents must review their AFHMP every five years or when the local Community Development jurisdiction's Consolidated Plan is updated, or when there are significant changes in the demographics of the project or the local housing market area. When reviewing the plan, the respondent should consider the current demographics of the housing market area to determine if there have been demographic changes in the population in terms of race, color, national origin, religion, sex, familial status, or disability. The respondent will then determine if the population least likely to apply for the housing is still the population identified in the AFHMP, whether the advertising and publicity cited in the current AFHMP are still appropriate, or whether advertising sources should be modified or expanded. Even if the demographics of the housing market area have not changed, the respondent should determine if the outreach currently being performed is reaching those it is intended to reach as measured by project occupancy and applicant data. If not, the AFHMP should be updated. The revised AFHMP must be submitted to HUD for approval. HUD may review whether the affirmative marketing is actually being performed in accordance with the AFHMP. If based on their review, respondents determine the AFHMP does not need to be revised, they should maintain a file documenting what was reviewed, what was found as a result of the review, and why no changes were required. HUD may review this documentation.

Notification of Intent to Begin Marketing.

No later than 90 days prior to the initiation of rental marketing activities, the respondent must submit notification of intent to begin marketing. The notification is required by the AFHMP Compliance Regulations (24 CFR 108.15). The Notification is submitted to the Office of Housing in the HUD Office servicing the locality in which the proposed housing will be located. Upon receipt of the Notification of Intent to Begin Marketing from the applicant, the monitoring office will review any previously approved plan and may schedule a pre-occupancy conference. Such conference will be held prior to initiation of sales/rental marketing activities. At this conference, the previously approved AFHMP will be reviewed with the applicant to determine if the plan, and/or its proposed implementation, requires modification prior to initiation of marketing in order to achieve the objectives of the AFHM regulation and the plan.

OMB approval of the AFHMP includes approval of this notification procedure as part of the AFHMP. The burden hours for such notification are included in the total designated for this AFHMP form.

Worksheet 1: Determining Demographic Groups Least Likely to Apply for Housing Opportunities
(See AFHMP, Block 3b)

In the respective columns below, indicate the percentage of demographic groups among the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area (See instructions to Block 1e). If you are a new construction or substantial rehabilitation project and do not have residents or project applicant data, only report information for census tract, housing market area, and expanded market area. The purpose of this information is to identify any under-representation of certain demographic groups in terms of race, color, national origin, religion, sex, familial status, or disability. If there is significant under-representation of any demographic group among project residents or current applicants in relation to the housing/expanded housing market area, then targeted outreach and marketing should be directed towards these individuals least likely to apply. Please indicate under-represented groups in Block 3b of the AFHMP. **Please attach maps showing both the housing market area and the expanded housing market area.**

Demographic Characteristics	Project's Residents	Project's Applicant Data	Census Tract	Housing Market Area	Expanded Housing Market Area
% White					
% Black or African American					
% Hispanic or Latino					
% Asian					
% American Indian or Alaskan Native					
% Native Hawaiian or Pacific Islander					
%Persons with Disabilities					
% Families with Children under the age of 18					
Other (specify)					

Worksheet 2: Establishing a Residency Preference Area (See AFHMP, Block 4a)

Complete this Worksheet if you wish to continue, revise, or add a residency preference, which is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). If a residency preference is utilized, the preference must be in accordance with the non-discrimination and equal opportunity requirements contained in 24 CFR 5.105(a). This Worksheet will help show how the percentage of the population in the residency preference area compares to the demographics of the project's residents, applicant data, census tract, housing market area, and expanded housing market area. **Please attach a map clearly delineating the residency preference geographical area.**

Demographic Characteristics	Project's Residents (as determined in Worksheet 1)	Project's Applicant Data (as determined in Worksheet 1)	Census Tract (as determined in Worksheet 1)	Housing Market Area (as determined in Worksheet 1)	Expanded Housing Market Area (as determined in Worksheet 1)	Residency Preference Area (if applicable)
% White						
% Black or African American						
% Hispanic or Latino						
% Asian						
% American Indian or Alaskan Native						
% Native Hawaiian or Pacific Islander						
% Persons with Disabilities						
% Families with Children under the age of 18						
Other (specify)						

Worksheet 3: Proposed Marketing Activities –Community Contacts (See AFHMP, Block 4b)

For each targeted marketing population designated as least likely to apply in Block 3b, identify at least one community contact organization you will use to facilitate outreach to the particular population group. This could be a social service agency, religious body, advocacy group, community center, etc. State the names of contact persons, their addresses, their telephone numbers, their previous experience working with the target population, the approximate date contact was/will be initiated, and the specific role they will play in assisting with the affirmative fair housing marketing. Please attach additional pages if necessary.

Targeted Population(s)	Community Contact(s), including required information noted above.

Worksheet 4: Proposed Marketing Activities – Methods of Advertising (See AFHMP, Block 4c)

Complete the following table by identifying your targeted marketing population(s), as indicated in Block 3b, as well as the methods of advertising that will be used to market to that population. For each targeted population, state the means of advertising that you will use as applicable to that group and the reason for choosing this media. In each block, in addition to specifying the media that will be used (e.g., name of newspaper, television station, website, location of bulletin board, etc.) state any language(s) in which the material will be provided, identify any alternative format(s) to be used (e.g. Braille, large print, etc.), and specify the logo(s) (as well as size) that will appear on the various materials. Attach additional pages, if necessary, for further explanation. Please attach a copy of the advertising or marketing material.

Targeted Population(s)→ Methods of Advertising ↓	Targeted Population:	Targeted Population:	Targeted Population:
Newspaper(s)			
Radio Station(s)			
TV Station(s)			
Electronic Media			
Bulletin Boards			
Brochures, Notices, Flyers			
Other (specify)			

Census Tract 16, Richland, SC

Census Tract in: [Columbia, SC](#), [Richland County, SC](#), [South Carolina](#), [United States](#)

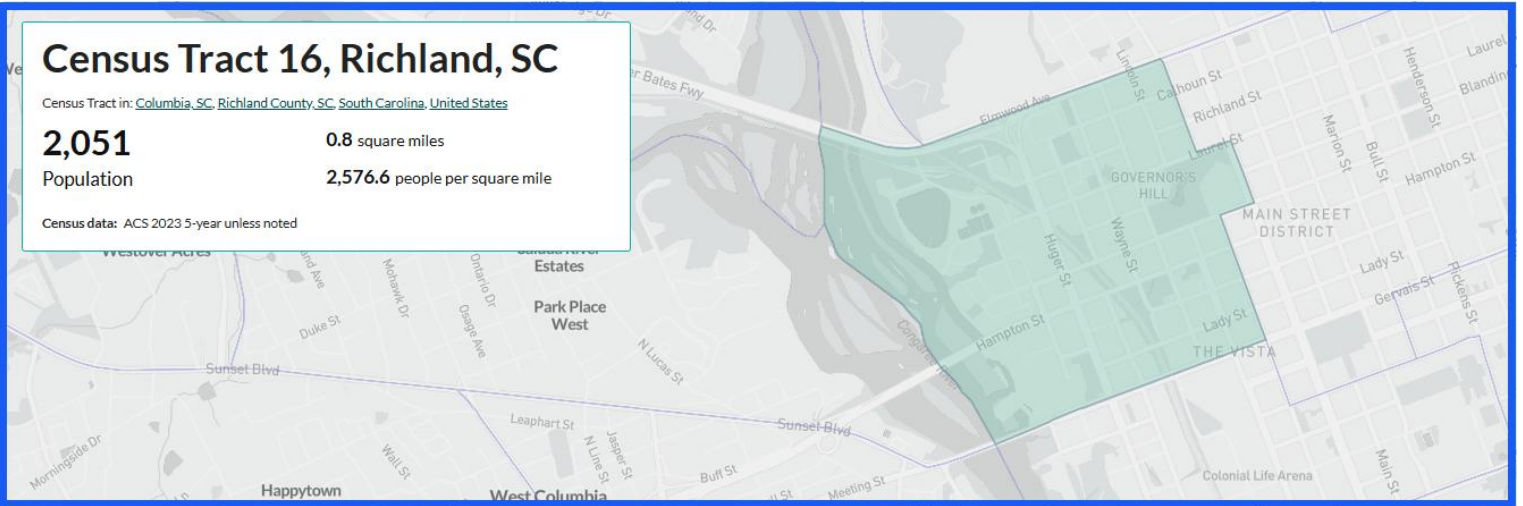
2,051

Population

0.8 square miles

2,576.6 people per square mile

Census data: ACS 2023 5-year unless noted



Columbia, SC

Place in: [2 counties](#), [Columbia, SC Metro Area](#), [South Carolina](#), [United States](#)

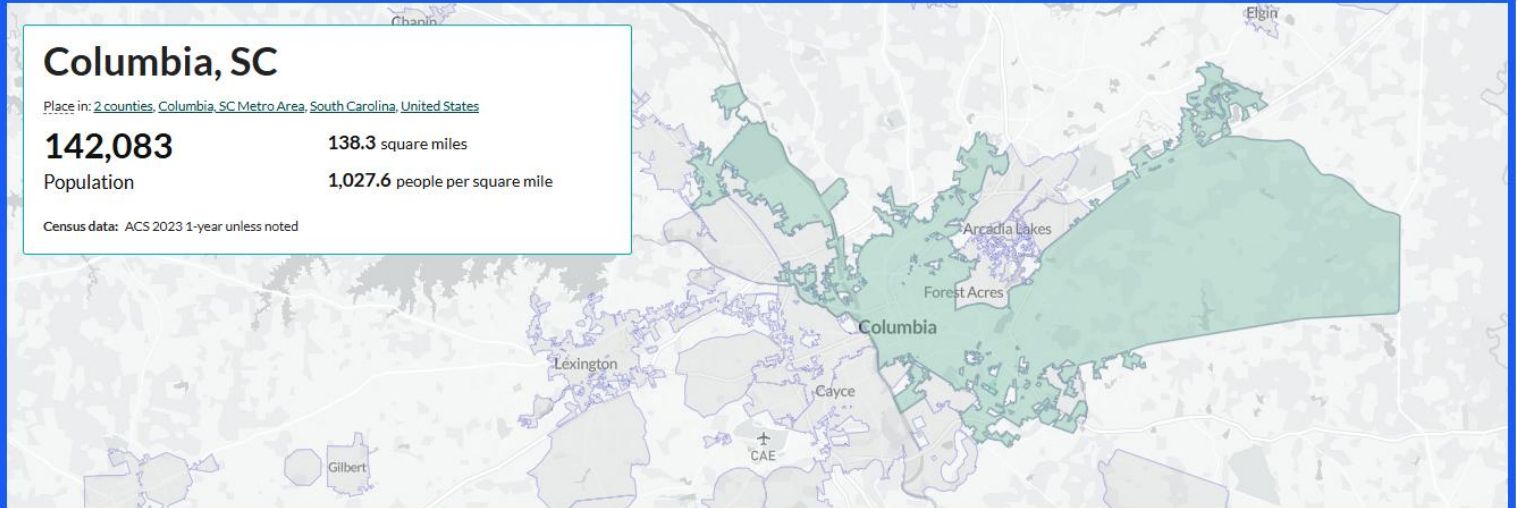
142,083

Population

138.3 square miles

1,027.6 people per square mile

Census data: ACS 2023 1-year unless noted



Columbia, SC Metro Area

Core Based Statistical Area in: [Columbia-Sumter-Orangeburg, SC CSA](#), [United States](#)

856,889

Population

3,703.1 square miles

231.4 people per square mile

Census data: ACS 2023 1-year unless noted

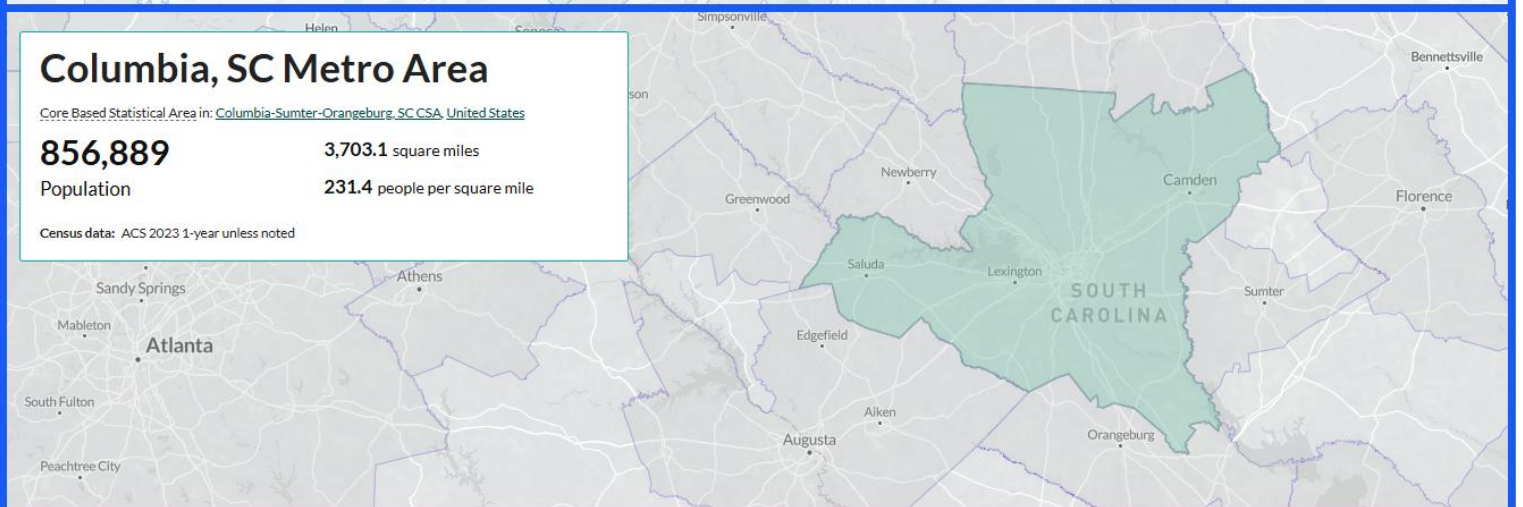


Table: ACSDP5Y2023.DP05

	Census Tract 16; Richland County; South Carolina	Columbia city, South Carolina	Columbia, SC Metro Area
Label	Percent	Percent	Percent
SEX AND AGE			
Total population	2,051	138,019	839,868
Male	55.2%	49.4%	48.5%
Female	44.8%	50.6%	51.5%
Sex ratio (males per 100 females)	(X)	(X)	(X)
Under 5 years	2.7%	5.4%	5.6%
5 to 9 years	3.3%	4.5%	6.0%
10 to 14 years	1.1%	4.1%	6.6%
15 to 19 years	0.2%	13.3%	7.5%
20 to 24 years	31.6%	15.3%	7.7%
25 to 34 years	39.4%	17.6%	13.5%
35 to 44 years	9.7%	10.9%	12.8%
45 to 54 years	4.4%	9.5%	12.1%
55 to 59 years	1.7%	4.2%	6.1%
60 to 64 years	3.1%	4.2%	6.4%
65 to 74 years	0.2%	6.8%	9.8%
75 to 84 years	1.2%	3.2%	4.5%
85 years and over	1.3%	1.0%	1.5%
Median age (years)	(X)	(X)	(X)
Under 18 years	7.1%	17.1%	22.2%
16 years and over	92.9%	85.1%	80.4%
18 years and over	92.9%	82.9%	77.8%
21 years and over	91.5%	68.8%	72.7%
62 years and over	5.2%	13.8%	19.6%
65 years and over	2.7%	11.0%	15.7%
18 years and over	1,906	114,442	653,421
Male	56.3%	49.3%	47.7%
Female	43.7%	50.7%	52.3%
Sex ratio (males per 100 females)	(X)	(X)	(X)
65 years and over	56	15,187	132,270
Male	66.1%	44.5%	44.1%
Female	33.9%	55.5%	55.9%
Sex ratio (males per 100 females)	(X)	(X)	(X)
RACE			
Total population	2,051	138,019	839,868
One race	92.7%	94.1%	94.1%
Two or More Races	7.3%	5.9%	5.9%
One race	92.7%	94.1%	94.1%

Table: ACSDP5Y2023.DP05

	Census Tract 16; Richland County; South Carolina	Columbia city, South Carolina	Columbia, SC Metro Area
Label	Percent	Percent	Percent
White	66.6%	49.9%	55.4%
Black or African American	20.5%	39.5%	33.3%
American Indian and Alaska Native	0.0%	0.2%	0.2%
Aztec	0.0%	0.0%	0.1%
Blackfeet Tribe of the Blackfeet Indian Reservation of Montana	0.0%	0.0%	0.0%
Maya	0.0%	0.0%	0.0%
Native Village of Barrow Inupiat Traditional Government	0.0%	0.0%	0.0%
Navajo Nation	0.0%	0.0%	0.0%
Nome Eskimo Community	0.0%	0.0%	0.0%
Other American Indian and Alaska Native	0.0%	0.2%	0.2%
Asian	4.3%	2.7%	2.3%
Asian Indian	0.6%	0.8%	0.9%
Chinese	1.5%	0.4%	0.4%
Filipino	0.0%	0.4%	0.3%
Japanese	0.0%	0.1%	0.0%
Korean	0.4%	0.3%	0.3%
Vietnamese	0.6%	0.3%	0.1%
Other Asian	1.2%	0.4%	0.3%
Native Hawaiian and Other Pacific Islander	0.0%	0.2%	0.1%
Chamorro	0.0%	0.2%	0.1%
Native Hawaiian	0.0%	0.0%	0.0%
Samoan	0.0%	0.0%	0.0%
Other Native Hawaiian and Other Pacific Islander	0.0%	0.0%	0.0%
Some Other Race	1.3%	1.7%	2.7%
Two or More Races	7.3%	5.9%	5.9%
White and Black or African American	3.8%	1.5%	1.4%
White and American Indian and Alaska Native	0.1%	0.6%	0.5%
White and Asian	0.0%	0.7%	0.5%
White and Some Other Race	2.0%	1.5%	2.3%

Table: ACSDP5Y2023.DP05

	Census Tract 16; Richland County; South Carolina	Columbia city, South Carolina	Columbia, SC Metro Area
Label	Percent	Percent	Percent
Black or African American and American Indian and Alaska Native	0.0%	0.3%	0.2%
Black or African American and Some Other Race	0.0%	0.1%	0.2%
Race alone or in combination with one or more other races			
Total population	2,051	138,019	839,868
White	73.3%	54.9%	60.7%
Black or African American	24.3%	42.4%	35.7%
American Indian and Alaska Native	0.9%	1.4%	1.3%
Asian	4.8%	4.1%	3.1%
Native Hawaiian and Other Pacific Islander	0.5%	0.6%	0.3%
Some Other Race	4.1%	3.5%	5.5%
HISPANIC OR LATINO AND RACE			
Total population	2,051	138,019	839,868
Hispanic or Latino (of any race)	5.7%	5.7%	6.8%
Mexican	1.6%	2.0%	3.2%
Puerto Rican	0.8%	1.3%	1.1%
Cuban	0.0%	0.2%	0.3%
Other Hispanic or Latino	3.4%	2.2%	2.3%
Not Hispanic or Latino	94.3%	94.3%	93.2%
White alone	65.8%	47.9%	53.8%
Black or African American alone	19.7%	39.0%	33.0%
American Indian and Alaska Native alone	0.0%	0.1%	0.1%
Asian alone	4.3%	2.6%	2.2%
Native Hawaiian and Other Pacific Islander alone	0.0%	0.2%	0.1%
Some Other Race alone	0.0%	0.5%	0.5%
Two or More Races	4.4%	4.0%	3.4%
Two races including Some Other Race	0.0%	0.3%	0.5%
Two races excluding Some Other Race, and three or more races	4.4%	3.7%	2.9%
Total housing units	(X)	(X)	(X)

Table: ACSDP5Y2023.DP05

	Census Tract 16; Richland County; South Carolina	Columbia city, South Carolina	Columbia, SC Metro Area
Label	Percent	Percent	Percent
CITIZEN, VOTING AGE POPULATION			
Citizen, 18 and over population	1,804	110,332	629,902
Male	54.8%	49.1%	47.5%
Female	45.2%	50.9%	52.5%

Table: ACSDP5Y2023.DP02

	Census Tract 16; Richland County; South Carolina	Columbia city, South Carolina	Columbia, SC Metro Area
Label	Percent	Percent	Percent
HOUSEHOLDS BY TYPE			
Total households	1,288	51,784	334,378
Married-couple household	10.2%	30.1%	44.1%
With children of the householder under 18 years	2.4%	11.8%	16.8%
Cohabiting couple household	12.3%	7.6%	5.7%
With children of the householder under 18 years	1.5%	1.1%	2.0%
Male householder, no spouse/partner present	42.2%	24.4%	19.0%
With children of the householder under 18 years	0.9%	0.5%	1.1%
Householder living alone	35.8%	18.2%	13.8%
65 years and over	2.1%	3.5%	3.6%
Female householder, no spouse/partner present	35.3%	38.0%	31.3%
With children of the householder under 18 years	0.8%	7.8%	6.5%
Householder living alone	30.6%	21.2%	16.8%
65 years and over	0.4%	6.5%	7.3%
Households with one or more people under 18 years	5.5%	23.4%	30.1%
Households with one or more people 65 years and over	3.4%	21.9%	28.9%
Average household size	(X)	(X)	(X)
Average family size	(X)	(X)	(X)
RELATIONSHIP			
Population in households	1,949	111,685	807,572
Householder	66.1%	46.4%	41.4%
Spouse	7.2%	14.0%	18.2%
Unmarried partner	10.7%	3.5%	2.4%
Child	7.0%	25.4%	28.5%
Other relatives	0.4%	4.5%	6.5%
Other nonrelatives	8.6%	6.2%	3.0%
MARITAL STATUS			
Males 15 years and over	1,074	58,794	329,217
Never married	73.6%	59.0%	38.2%
Now married, except separated	16.9%	30.8%	48.2%
Separated	0.9%	1.4%	2.2%
Widowed	0.0%	2.1%	2.9%
Divorced	8.5%	6.7%	8.5%

Table: ACSDP5Y2023.DP02

	Census Tract 16; Richland County; South Carolina	Columbia city, South Carolina	Columbia, SC Metro Area
Label	Percent	Percent	Percent
Females 15 years and over	832	59,991	357,974
Never married	80.0%	52.7%	34.0%
Now married, except separated	16.5%	28.6%	43.4%
Separated	0.0%	2.6%	2.4%
Widowed	0.0%	5.7%	8.3%
Divorced	3.5%	10.4%	11.8%
FERTILITY			
Number of women 15 to 50 years old who had a birth in the past 12 months	16	1,744	10,230
Unmarried women (widowed, divorced, and never married)	0.0%	39.6%	42.9%
Per 1,000 unmarried women	(X)	(X)	(X)
Per 1,000 women 15 to 50 years old	(X)	(X)	(X)
Per 1,000 women 15 to 19 years old	(X)	(X)	(X)
Per 1,000 women 20 to 34 years old	(X)	(X)	(X)
Per 1,000 women 35 to 50 years old	(X)	(X)	(X)
GRANDPARENTS			
Number of grandparents living with own grandchildren under 18 years	0	1,013	17,211
Grandparents responsible for grandchildren	-	39.5%	44.8%
Years responsible for grandchildren			
Less than 1 year	-	13.0%	10.0%
1 or 2 years	-	3.9%	7.3%
3 or 4 years	-	8.8%	7.8%
5 or more years	-	13.7%	19.6%
Number of grandparents responsible for own grandchildren under 18 years	0	400	7,715
Who are female	-	82.5%	68.9%
Who are married	-	49.3%	61.5%
SCHOOL ENROLLMENT			
Population 3 years and over enrolled in school	614	42,968	214,957

Table: ACSDP5Y2023.DP02

	Census Tract 16; Richland County; South Carolina	Columbia city, South Carolina	Columbia, SC Metro Area
Label	Percent	Percent	Percent
Nursery school, preschool	0.0%	4.7%	5.3%
Kindergarten	6.4%	3.4%	4.8%
Elementary school (grades 1-8)	8.1%	21.0%	39.1%
High school (grades 9-12)	0.0%	12.7%	21.4%
College or graduate school	85.5%	58.2%	29.4%
EDUCATIONAL ATTAINMENT			
Population 25 years and over	1,253	79,229	559,923
Less than 9th grade	0.0%	2.2%	2.7%
9th to 12th grade, no diploma	1.2%	6.9%	6.2%
High school graduate (includes equivalency)	4.6%	19.2%	25.3%
Some college, no degree	9.7%	18.2%	21.2%
Associate's degree	7.8%	7.4%	9.6%
Bachelor's degree	39.1%	25.2%	20.8%
Graduate or professional degree	37.5%	20.9%	14.2%
High school graduate or higher	98.8%	90.9%	91.1%
Bachelor's degree or higher	76.6%	46.1%	35.0%
VETERAN STATUS			
Civilian population 18 years and over	1,882	107,322	642,344
Civilian veterans	4.1%	7.1%	9.4%
DISABILITY STATUS OF THE CIVILIAN NONINSTITUTIONALIZED POPULATION			
Total Civilian Noninstitutionalized Population	2,027	121,184	814,868
With a disability	7.5%	12.7%	14.3%
Under 18 years	145	23,052	185,794
With a disability	0.0%	3.9%	5.1%
18 to 64 years	1,826	83,783	499,984
With a disability	6.4%	10.7%	12.3%
65 years and over	56	14,349	129,090
With a disability	64.3%	38.0%	35.3%
RESIDENCE 1 YEAR AGO			
Population 1 year and over	2,025	136,632	831,844
Same house	54.5%	67.3%	84.1%
Different house (in the U.S. or abroad)	45.5%	32.7%	15.9%
Different house in the U.S.	42.3%	31.3%	15.3%
Same county	17.7%	10.0%	6.4%

Table: ACSDP5Y2023.DP02

	Census Tract 16; Richland County; South Carolina	Columbia city, South Carolina	Columbia, SC Metro Area
Label	Percent	Percent	Percent
Different county	24.6%	21.3%	8.9%
Same state	13.3%	9.2%	4.6%
Different state	11.4%	12.1%	4.4%
Abroad	3.2%	1.4%	0.6%
PLACE OF BIRTH			
Total population	2,051	138,019	839,868
Native	93.6%	94.9%	94.4%
Born in United States	92.8%	93.1%	92.7%
State of residence	51.3%	52.3%	57.9%
Different state	41.5%	40.8%	34.8%
Born in Puerto Rico, U.S. Island areas, or born abroad to American parent(s)	0.8%	1.8%	1.7%
Foreign-born	6.4%	5.1%	5.6%
U.S. CITIZENSHIP STATUS			
Foreign-born population	131	7,040	46,628
Naturalized U.S. citizen	22.1%	37.6%	44.8%
Not a U.S. citizen	77.9%	62.4%	55.2%
YEAR OF ENTRY			
Population born outside the United States	147	9,510	60,999
Native	16	2,470	14,371
Entered 2010 or later	0.0%	30.9%	24.3%
Entered before 2010	100.0%	69.1%	75.7%
Foreign-born	131	7,040	46,628
Entered 2010 or later	77.9%	55.0%	37.3%
Entered before 2010	22.1%	45.0%	62.7%
WORLD REGION OF BIRTH OF FOREIGN-BORN			
Foreign-born population, excluding population born at sea	131	7,040	46,628
Europe	7.6%	13.9%	12.6%
Asia	66.4%	39.1%	31.8%
Africa	0.0%	8.6%	5.5%
Oceania	0.0%	0.3%	0.4%
Latin America	19.1%	35.3%	47.4%
Northern America	6.9%	2.8%	2.3%
LANGUAGE SPOKEN AT HOME			
Population 5 years and over	1,995	130,607	792,950
English only	90.0%	91.5%	91.4%
Language other than English	10.0%	8.5%	8.6%

Table: ACSDP5Y2023.DP02

	Census Tract 16; Richland County; South Carolina	Columbia city, South Carolina	Columbia, SC Metro Area
Label	Percent	Percent	Percent
Speak English less than "very well"	1.8%	2.0%	2.9%
Spanish	3.4%	3.9%	5.1%
Speak English less than "very well"	0.0%	1.0%	1.9%
Other Indo-European languages	1.5%	2.1%	1.7%
Speak English less than "very well"	0.7%	0.6%	0.4%
Asian and Pacific Islander languages	3.1%	1.6%	1.3%
Speak English less than "very well"	1.2%	0.4%	0.4%
Other languages	2.0%	0.8%	0.6%
Speak English less than "very well"	0.0%	0.1%	0.2%
ANCESTRY			
Total population	2,051	138,019	839,868
American	5.6%	5.3%	6.5%
Arab	2.7%	0.8%	0.5%
Czech	0.0%	0.2%	0.1%
Danish	0.0%	0.1%	0.2%
Dutch	0.0%	0.5%	0.5%
English	7.5%	8.8%	9.5%
French (except Basque)	3.5%	1.7%	1.5%
French Canadian	0.0%	0.2%	0.2%
German	10.3%	9.0%	9.5%
Greek	0.4%	0.4%	0.3%
Hungarian	0.0%	0.2%	0.2%
Irish	13.0%	7.2%	7.3%
Italian	5.4%	3.0%	2.5%
Lithuanian	0.0%	0.1%	0.1%
Norwegian	1.3%	0.6%	0.4%
Polish	2.7%	1.1%	1.3%
Portuguese	1.0%	0.1%	0.1%
Russian	0.0%	0.4%	0.3%
Scotch-Irish	0.4%	2.1%	1.8%
Scottish	1.3%	2.0%	1.9%
Slovak	0.0%	0.1%	0.0%
Subsaharan African	0.0%	2.1%	1.6%
Swedish	0.6%	0.3%	0.4%
Swiss	0.0%	0.1%	0.2%

Table: ACSDP5Y2023.DP02


	Census Tract 16; Richland County; South Carolina	Columbia city, South Carolina	Columbia, SC Metro Area
Label	Percent	Percent	Percent
Ukrainian	0.0%	0.2%	0.1%
Welsh	0.6%	0.5%	0.4%
West Indian (excluding Hispanic origin groups)	0.0%	1.0%	0.6%
COMPUTERS AND INTERNET USE			
Total households	1,288	51,784	334,378
With a computer	100.0%	96.5%	95.3%
With a broadband Internet subscription	99.5%	87.9%	89.0%

Table: ACSDT5Y2023.B11004

	Census Tract 16; Richland County; South Carolina	Columbia city, South Carolina	Columbia, SC Metro Area
Label	Estimate	Estimate	Estimate
Total:	189	24,696	210,266
Married-couple family:	132	15,577	147,317
With related children of the householder under 18 years:	31	6,317	60,234
Under 6 years only	15	1,997	13,067
Under 6 years and 6 to 17 years	16	1,480	13,342
6 to 17 years only	0	2,840	33,825
No related children of the householder under 18 years	101	9,260	87,083
Other family:	57	9,119	62,949
Male householder, no spouse present:	38	1,402	14,596
With related children of the householder under 18 years:	21	528	7,555
Under 6 years only	0	165	1,861
Under 6 years and 6 to 17 years	0	61	952
6 to 17 years only	21	302	4,742
No related children of the householder under 18 years	17	874	7,041
Female householder, no spouse present:	19	7,717	48,353
With related children of the householder under 18 years:	19	4,990	31,132
Under 6 years only	10	1,235	6,044
Under 6 years and 6 to 17 years	9	1,376	6,483
6 to 17 years only	0	2,379	18,605
No related children of the householder under 18 years	0	2,727	17,221
Total with Children < 18	71	11,835	98,921
Percent of Total (AFHMP)	37.6%	47.9%	47.0%



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- Large Closets
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- Patio
- 9 Foot Ceilings
- Pantry

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- Swimming Pool
- BBQ and Picnic Area
- Clubhouse
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grace hill



Fair Housing

WORKBOOK

Welcome to Grace Hill's

Fair Housing

Fair housing is the law of the land, starting with the federal Fair Housing Act and continuing through various state and local statutes and regulations. To avoid costly violations, you must understand what fair housing means and what the laws require. This course is designed to provide you with that information. Your mastery of fair housing will serve you well in many aspects of your career in the multifamily industry.

This workbook will enhance your learning experience and provide you with an easy-to-reference job aid to use when you return to work. Please take a moment to download this workbook and complete the activities as you go through the course. Then, print the job aids as reminders of the important strategies you learned so you can practice applying them on the job.

Course Disclaimer: This material has been prepared for educational and informational purposes only, and is not intended to provide and should not be relied on for legal advice. You should consult an attorney regarding particular sets of facts or circumstances, including your own company's policies and procedures or specific instances of conduct in the workplace.

Name

Date



WHAT IS FAIR HOUSING?

Fill-in-the-Blank, True/False and Reflection Questions to demonstrate your knowledge.

Introduction

Welcome to What is Fair Housing?

Fair housing laws are more than just another set of rules; they are essential to the expansion of civil rights in the United States.

Fair housing laws provide individuals protection from discrimination and harassment when renting, buying, or securing financing for housing.

From the moment you first come into contact with a prospective resident, you are responsible for complying with fair housing law.

Understanding the basics, including how the law protects people, is the first step towards ensuring that you and your community avoid discriminatory practices and create a welcoming community for all current and future residents.

You will learn:

- The purpose of the federal fair housing laws and how to comply with them, and
- The definitions of the federally protected classes and that states and localities may have additional protected classes

Fair Housing Laws

The federal fair housing laws are a result of the _____ during the 1960s. Prior to the _____, there were no laws prohibiting property managers, real estate agents, and mortgage lenders from discriminating or refusing to sell, rent, or lend to people for any reason.

In _____, Congress passed Title _____ of the Civil Rights Act. Title _____ is also known as the Fair Housing

Act. The Fair Housing Act protects certain groups of people from discrimination when they are renting, buying, or securing financing for housing.

The Fair Housing Act and amendments made to it over the years protect people from discrimination based on their race, _____, _____, religion, sex, disability, and familial status. These categories are called _____ classes.

Protected Classes

There are seven protected classes:

CLASS	DESCRIPTION
Race	A classification system used to categorize humans into large distinct groups by anatomical, cultural, _____, genetic, geographical, historical, or social affiliation.
Color	_____ pigmentation; someone's skin being lighter or darker than someone else's, even if they are of the same race, national origin, or ethnic origin.
National Origin	A person's or their ancestor's place of _____.
_____	An organized system of beliefs or devotion to a religious faith. Moral or ethical beliefs which are sincerely held with the strength of traditional religious views.
Sex	Gender (includes sexual orientation, and gender identity). The protected class of sex also includes protection against _____ sexual harassment and gender stereotypes.

_____	Any physical or mental impairment that substantially limits one or more major life activities; a record of having such impairment; or someone who is regarded as having such impairment.
Familial Status	One or more individuals under _____ years of age living with a parent or other adult having legal _____ or with the written permission of the legal custodian. Pregnant women and families in the process of adopting are also protected.



Are you a member of any protected class?

In early 2012, HUD published the _____. The rule is intended to ensure that housing across all HUD programs is open to everyone regardless of actual or perceived sexual orientation, gender identity, or _____.

The rule also generally prohibits asking about sexual orientation or gender identity for the purpose of determining _____ for, or availability of, HUD-assisted housing.



HUD-assisted refers to properties with any of the following: FHA-mortgage insurance, a federal mortgage interest subsidy, project based rental assistance such as PRAC, HOME, CDBG, NSP, or other HUD funding including HUD funds allocated through state and local jurisdictions. Section 42 LIHTC communities and communities that accept Section 8 vouchers are not assisted housing.

LGBT as a Protected Class

The Equal Access Rule applies to HUD-assisted communities and many states and cities already protect LGBTQ individuals from discrimination, but until recently, the Fair Housing Act was not interpreted to include sexual orientation and gender identity as protected classes.

Then, in June 2020, the Supreme Court ruled that employment discrimination based on sexual orientation or gender identity is discrimination based on sex. With this landmark decision, LGBTQ individuals received protection from employment discrimination at the federal level.

While the Supreme Court's decision applied only to employment law, the same reasoning applies to Fair Housing Laws as well. In January 2021 President Biden signed an executive order expanding the Court's ruling to all federal laws that prohibit sex discrimination.

This means that the FHA is now widely interpreted to prohibit discrimination based on sexual orientation and gender identity.

State and Locally Protected Classes

Some states, cities, and municipalities have expanded fair housing protection to include additional protected classes. Some examples are:

- _____
- Marital Status
- _____
- Source of _____
- _____ Status
- Students

Even if your area does not include some or all of the additional protections, all people should be treated fairly and equally.

Exemptions

The Fair Housing Act covers most housing. However, some types of housing are exempt from fair housing laws. Even if a property is exempt, all statements, notices, and spoken and written advertising materials must comply with fair housing laws.

Fill-in *the protected class* that each exemption relates to

EXAMPLE OF EXEMPT HOUSING	PROTECTED CLASS
Housing Owned by Religious Organizations	<hr/> <hr/>
Owner-Occupied Housing	<hr/> <hr/>
Single Family Homes	<hr/> <hr/>
Private Clubs	<hr/> <hr/>
Senior Housing Properties	<hr/> <hr/>

Complying with Fair Housing Laws

Every interaction you have with prospective and current _____ is an opportunity to comply with fair housing laws and prevent discriminatory housing practices. You play a very important role.

By treating everyone fairly, equally, and _____, you help reduce the risk of violating fair housing laws and create a welcoming atmosphere and sense of _____ for your customers.

Fair housing laws protect people from discrimination throughout all stages of your interactions, not just after they become residents of your community.

From the first contact, whether by phone call, email, text, or in-person, you are responsible for _____ with fair housing laws and treating all people in a non-discriminatory manner.



Did you know that it's possible to discriminate against someone without ever having direct contact with that person?

Be sure to research the _____ and local laws in your area and follow them at all times. Check with your supervisor if you need guidance or help understanding the laws.

Summary

Points to remember:

- The federal fair housing laws came about as a result of the Civil Rights Movement during the 1960s.
- The purpose of the Fair Housing Act is to eliminate discrimination and ensure all people are treated fairly, equally, and consistently in the sale, rental, and financing of housing.
- The federal fair housing laws define seven protected classes. States, cities, and municipalities may include more groups as protected classes under fair housing laws.
- Fair housing laws cover most housing, though some types of housing are exempt.
- By treating everyone fairly, equally, and consistently, you help reduce the risk of violating fair housing laws and create a welcoming atmosphere and sense of community for your customers.



UNDERSTANDING DISCRIMINATION

Fill-in-the-Blank, True/False and Reflection
Questions to demonstrate your knowledge.

Introduction

Have you ever been treated differently or unfairly because of your ethnicity, age, gender, or another characteristic? If so, you know how painful discrimination is. You can also appreciate the negative effect that being denied opportunities can have on someone's life.

Discrimination has real and lasting consequences. Unfortunately, it's also a real problem in the United States. The National Fair Housing Alliance estimates that there are over 4 million cases of housing discrimination a year, with the majority going unreported.

Avoiding discrimination against prospective and current residents is not only the right thing to do, but it also helps avoid legal troubles and unnecessary expenses for both you and your community.

Here, you'll learn about common types of housing discrimination and some of the possible financial and legal consequences of not following fair housing laws.

You will learn:

- How to identify specific types of discrimination prohibited by federal fair housing laws.
- How a violation of federal fair housing laws can result in significant expenses for both your company and you personally.
- How fair housing laws are enforced.

Forms of Discrimination

Discrimination is when a person is treated _____ or _____ for a reason related to their membership in a certain

protected class. A person does not need to be _____ to have been discriminated against, just treated differently.

The Fair Housing Act prohibits a number of specific forms of housing discrimination. These are:

FORM OF DISCRIMINATION	DESCRIPTION
Refusal to sell or rent	It is illegal to refuse to _____, sell, or rent housing to individuals based on their membership in a protected class. This includes refusing to show available apartment homes and refusing to supply rental information.
Discrimination in terms, conditions, or privileges	Setting different _____, conditions, or privileges for buying or renting housing is a little less direct than outright _____ to rent or sell, but it is just as illegal.
Discrimination in advertising	It is illegal to create, publish or distribute housing _____ that discriminate, limit, or deny equal access to housing because of membership in any of the federally protected classes. It is also considered discrimination to advertise in methods or locations that may _____ particular groups access to information about housing opportunities.
Denying availability	It is illegal for a community staff member to _____ deny that a rental unit is available to prospects based on their membership in a protected class.

Blockbusting and steering	<p>Blockbusting is when housing providers, in order to make a profit, encourage people to sell or rent (or not sell or rent) their homes so that certain _____ of people will come into or leave the community.</p> <p>Steering is when a prospect is _____ away from (or towards) housing in a particular area. Usually this happens because assumptions are made about the prospect.</p>
Failure to make or permit reasonable accommodations or modifications	<p>Fair housing laws have specific guidelines that apply only to people with disabilities. To ensure full compliance, you must make or allow reasonable _____ and _____ to meet the individual needs of people with disabilities in securing and using housing.</p>

Disparate Impact

Behavior does not need to be intentionally discriminating for it to have a discriminatory effect.

Intentional discrimination is also known as disparate _____ and unintentional discrimination is known as disparate _____.

Put another way, disparate impact is when a practice or policy that seems fine on the surface has an unfair, negative impact on members of a protected class.

If a policy or practice that was created with good intentions actually ends up being discriminatory, you and your community could be held liable for discrimination. It doesn't matter whether you _____ to discriminate or not.

Disparate impact can be scary because it seems to open up every policy and practice to the risk of litigation.

However, HUD's 2013 rule, the Implementation of the Fair Housing Act's Discriminatory Effects Standard, established a _____ standard for determining whether a housing policy or practice violates fair housing law based on it having a disparate impact.

The rule says that only policies that have a disparate impact on a protected class, don't serve a _____ business purpose, and could be achieved through less discriminatory means are likely to result in liability.



Disparate impact is an area of fair housing that is evolving rapidly. It's important to stay up-to-date on this subject.

Costs of Discrimination

Intentional or not, a discrimination lawsuit could cost both you personally and your employer thousands of dollars.

If a prospect or resident feels that they were discriminated against, they can:

- File a complaint with HUD or state and local fair housing agencies up to _____ from the date of the discriminatory act
- File a private suit in federal court for up to _____ after the discriminatory act

If found responsible, both you and your community can be forced to pay different kinds of fees and ordered to change how you work in order to prevent further discrimination.

Types of Damages

DAMAGE	DESCRIPTION
Actual Damages	Any out-of-pocket _____ the person filing the claim has incurred, which may also include embarrassment, humiliation, and emotional distress caused by the discrimination.
Punitive Damages	Monies awarded to _____ the defendant for the defendant's wrongful conduct and _____ future wrongful conduct. This includes the personal offender, management, and owner.
Civil Penalties	_____ imposed by a government agency in order to compensate the agency for the harm done, rather than to punish the person who violated the law.
Injunction	A _____ requiring either party to start or stop a particular action. Injunctive relief is a way in which the court can handle a problem and is not a judgment for money.



There is NO LIMIT in the federal FHA to the amount of punitive damages that may be awarded.

While significant, financial costs are far from the only negative consequence of housing discrimination. Communities that gain a reputation for unfair treatment may also find:

Residents are less _____. It's impossible to create a feeling of community when people feel unwelcome. Resident turnover may also increase.

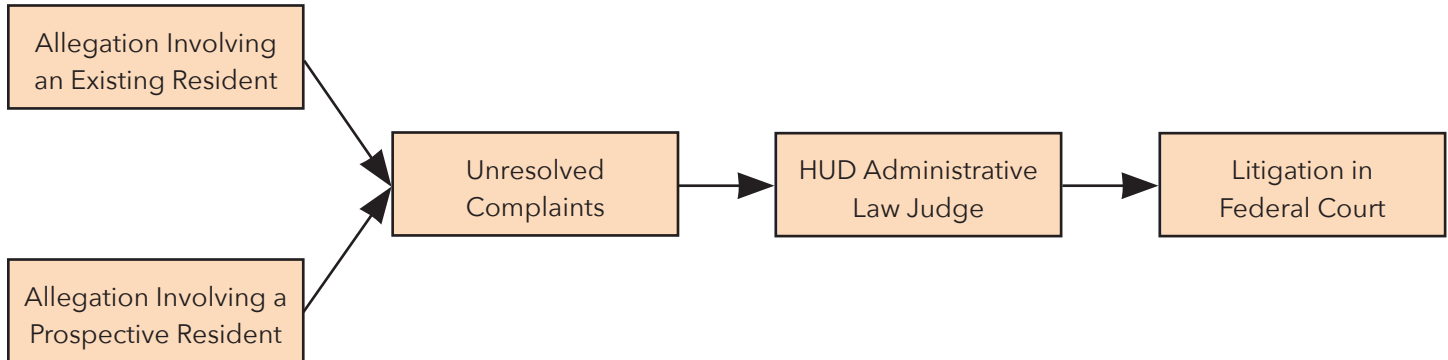
Prospects are less likely to _____. If word-of-mouth turns against you, your new customer traffic will decrease.

Employee _____ will drop. It takes time and energy to handle the stress of a fair housing violation.

Investigating Complaints

In 2019, HUD and FHAP agencies investigated _____ complaints of housing discrimination. Keep in mind that the complaints actually reported to HUD and FHAP agencies are only a snapshot. It is thought that most housing discrimination goes _____.

HUD Enforcement Process



Equal opportunity in housing is guaranteed not just by the federal Fair Housing Act, but also by state and local laws.

Many times, it is not _____ that will investigate and enforce claims, but rather a state or local agency. This happens through HUD's Fair Housing Assistance Program (FHAP), which provides funding to state and local agencies.

If a housing discrimination complaint is made in a state or locality that is part of HUD's _____, the complaint is handed to the state or local agency. The agency is required to commence proceedings within 30 days of receiving the complaint.



Lawsuits resulting from fair housing discrimination are aggressively pursued by HUD. It is a good idea to keep up with the kinds of claims being made and how HUD is responding to them. Looking at these real-life, current examples is one of the best ways to keep learning about common fair housing pitfalls and how to avoid them.

Summary

Points to Remember:

- Discrimination is when a group or individual is treated differently due to membership in a protected class.
- The Fair Housing Act prohibits specific discriminatory behavior, including refusal to sell or rent, discrimination in terms, conditions or privileges, discrimination in advertising, denying availability, blockbusting, steering, and failure to make or permit reasonable accommodations and modifications.
- Disparate impact is when a policy or procedure has a discriminatory effect, even though the policy or procedure was not intended to discriminate. You can be held liable for discrimination even if you did not intend to discriminate.
- HUD enforces federal fair housing laws, along with state and local agencies that are empowered to enforce fair housing laws as part of HUD's Fair Housing Assistance Program (FHAP).
- A violation of federal fair housing laws can result in significant expense for both your company and you personally.



UNDERSTANDING HARASSMENT

Fill-in-the-Blank, True/False and Reflection
Questions to demonstrate your knowledge.

Introduction

Everyone likes to feel “at home.” Feeling at home means feeling like you belong. It means feeling relaxed, comfortable, and safe. People have the right to feel “at home” in their own homes.

Unfortunately, for thousands of people every year, home isn’t where the heart is...it’s where harassment is.

You might not think of harassment as a fair housing issue, but it happens more than you’d think. Seventeen percent of the cases investigated by HUD and FHAP agencies in 2016—or 1,424 claims—were filed due to harassing behaviors like coercion, intimidation, threats, and retaliation.

Harassment on the basis of any of the protected classes is illegal under fair housing law. Here, we’ll learn more about different types of harassment.

You will learn:

- How harassment relates to fair housing law and how harassment claims are filed.
- How to identify the types of harassment prohibited by federal fair housing laws.

Harassment and Fair Housing

As it relates to fair housing, harassment is _____ verbal or physical conduct that is severe enough to interfere with a person’s ability to _____ or enjoy their use of housing and related services and facilities.

It is your responsibility to behave professionally. Do not engage in harassing behavior.



If property owners or managers knew or should have known about harassing behavior and did nothing to stop it, they can be held liable for any resulting harm. True False

Victims of harassment can file a claim with HUD or a substantially equivalent state or local fair housing agency. Victims have up to one year after the alleged harassment occurred to file with HUD. The time limit for state or local fair housing agencies varies. It is often less than one year and could be as short as 180 days.

Harassment claims may be filed even if the victim did not experience a tangible loss, like eviction.

Types of Harassment

Label the examples with the type of harassment.

TYPE OF HARASSMENT	EXAMPLE
_____	A landlord leaves harassing notes and messages for a female resident to have a romantic relationship with him, and threatens to evict her if she does not consent.
_____	A property manager issues a 20-day termination notice to a resident because she filed a discrimination claim against one of the property's leasing agents.
_____	A landlord agrees to repair the broken heater in the apartment of a Christian family only if the Christian family agrees to hide all visible signs of their faith, including a cross on the apartment's exterior door.

Sexual Harassment

While harassment of any kind is illegal, the topic of sexual harassment warrants special consideration. Every year, thousands of people, the majority of which are women, face unwelcome comments and requests for sexual favors from landlords, property managers, maintenance workers, and security guards.

In 2017, the DOJ announced an initiative to combat sexual harassment in housing. Since then, over \$_____ has been awarded to victims of sexual harassment in housing.

HUD and the DOJ recognize two types of sexual harassment.

Label the examples with the type of sexual harassment.

TYPE OF SEXUAL HARASSMENT	EXAMPLE
_____ _____	A maintenance technician making frequent comments about a resident's body while she is at the swimming pool to the point where his behavior makes her stop visiting the swimming pool.
_____ _____ _____	A leasing agent telling a prospective resident that she'll waive his application fee if he goes on a date with her.

Here are some guidelines about what is and isn't appropriate:

- Do not initiate _____ or _____ with customers and coworkers.
- Avoid commenting on how customers and coworkers _____.
- If you see harassing behavior happening, don't _____ and don't ignore it.
- If you are a supervisor, immediately investigate and _____ to any complaints of harassment.



The increased spotlight on sexual harassment is not going away. HUD is serious about investigating complaints of sexual harassment, and owners and operators of rental housing communities are paying the price.

Summary

Points to Remember:

- Harassment is unwelcome verbal or physical conduct that is severe enough to interfere with a person's ability to secure or enjoy their use of housing and related services and facilities.
- Fair housing laws prohibit harassment, including coercion, intimidation, interference, retaliation, hostile environment, and quid pro quo.
- You are responsible for your own behavior. Property owners and managers can also be held liable for the behavior of their employees, vendors, and contractors.



REASONABLE ACCOMMODATIONS AND MODIFICATIONS

Fill-in-the-Blank, True/False and Reflection Questions to demonstrate your knowledge.

Introduction

People with disabilities face particular challenges when it comes to housing and have special protections under fair housing law. Disabilities include both physical and mental impairments. It may not always be obvious that someone has a disability, which can make complying with fair housing law in this area a little tricky.

In order for people with disabilities to fully enjoy their homes at your community, it may be necessary for you to make changes to community rules, policies, procedures, services, or physical structures. These changes are called reasonable accommodations and modifications.

Here, you'll learn more about what disabilities are, what makes accommodation and modification requests "reasonable," and strategies for appropriately handling requests. This will help ensure that residents with disabilities can fully use and enjoy their homes, and will help reduce your risk of fair housing discrimination claims.

You will learn:

- How disability is defined in fair housing law.
- The definitions of reasonable accommodations and modifications under fair housing law.
- How to evaluate and appropriately respond to accommodation and modification requests.

Fair Housing Amendments Act

The Fair Housing Amendments Act, or FHAA, became effective on March 12, _____. This act has three main goals relating to persons with disabilities:

1	To end segregation of the housing available to people who have disabilities.
2	To give people with disabilities greater _____ to choose where they want to live.
3	To ensure that reasonable _____ and _____ in securing and using housing are made in order to meet the individual needs of people with disabilities.



Although the term “handicap” is used in the laws, “disability” is a more generally accepted term, and the term we will use in this course.

The FHAA defines disability as:

- Having a physical or mental _____ that substantially limits one or more major life activities, or
- Having a _____ of physical or mental impairment, or
- Being seen by another as an individual with a physical or mental impairment.



The law protects every user of controlled substances.

True

False

Impairments prevent people from doing things. For example, blindness is an impairment to seeing. If you have a hearing impairment, it means you can’t hear very well—if at all. Impairments include _____ and _____ impairments.

Accessibility Requirements

The Fair Housing Act contains a section requiring covered multifamily housing units occupied for the first time after March 13, 1991 to have certain accessibility features. These features must be provided over and above what local codes require for

accessibility. To meet the requirements of the law, all ground floor apartment homes and all apartment homes on floors served by elevators must have the accessibility features outlined below.

AREA	REQUIREMENT
Entrance	<p>All covered multifamily dwellings must have at least _____ building entrance on an accessible route unless the land or unusual characteristics of the site make it impossible to provide. An accessible route means a continuous, clear path connecting accessible elements and spaces within a building or site that can be used by someone in a wheelchair, and that is also safe and usable by people with other disabilities.</p> <p>An accessible entrance is a building entrance connected by an accessible route to _____, _____, accessible parking and passenger loading zones, or public streets and sidewalks.</p>
Common Areas	<p>Covered housing must have accessible and usable _____.</p> <p>Public and common-use areas cover all parts of the housing outside individual units. They include building-wide fire alarms, parking lots, storage areas, indoor and outdoor recreational areas, lobbies, mailrooms and mailboxes, and _____ areas.</p>
Doors	<p>All doors must be wide enough to accommodate people using _____.</p>
Access	<p>There must be at least one accessible route _____ and through each covered unit.</p>

Controls	Light switches, electrical outlets, thermostats, and other environmental controls must be in accessible locations.
Bathrooms	Reinforcements in bathroom walls must be installed, so that _____ can be added when needed. The law does not require installation of grab bars in bathrooms.
Kitchens	Kitchens and bathrooms must be usable; that is, designed and constructed so an individual in a wheelchair can _____ in the space provided.

Accommodations

One of the most common accommodation requests you will receive is to have an animal that would otherwise be _____ by community rules. The FHA uses the broad term “assistance animal” to describe any animal that works, provides assistance, performs tasks, or provides emotional support for a person with a disability.

Service animals are one type of assistance animal. Service animals are dogs that have been trained to perform _____ functions related to a disability.

Emotional support animals (sometimes called _____ animals) are also assistance animals. Emotional support animals are not trained to do work and can be any type of animal commonly kept in households.

Assistance animals are NOT pets. Assistance animals are not subject to fees, pet deposits, or pet rent.



To learn more about Assistance Animals, take Grace Hill’s Assistance Animals in Multifamily Housing course.

Modifications

A modification is a _____ or other physical change to the apartment home or common areas to provide a person with a disability physical access.

It is illegal to refuse a person with a disability permission to make reasonable modifications to the premises, at their own expense, if such modifications are necessary for that person to enjoy full use of the premises.

What is Reasonable

You do not have to make every accommodation or modification request that you receive. The key word is “_____.” If an accommodation or modification request is _____, you must make or permit it.

Fair housing laws provide specific standards to determine whether a request is reasonable or not. A requested accommodation or modification:

- Must not cause an _____ financial or administrative burden to the housing provider.
- Must not cause a basic change to the _____ of the housing programs available.
- Must not cause _____ or damage to others.
- And, must be technically _____.

Handling Requests

An individual may ask for accommodations or modifications at any time during the application process or residency. Requests may be made _____ or in _____.



It is not your responsibility to anticipate the need for an accommodation or modification. In fact, Grace Hill suggests that you never ask a resident if they need assistance related to their disability. Although it may seem like good manners to do so, you should wait for the resident to make the request.

Certain standards apply to reasonable modifications:

- The person with a disability is typically responsible for the _____ of the modification.
- If the modifications will interfere with the next resident's use, the person with a disability is responsible for returning the apartment to its _____ before moving out. However, the resident with the disability is not responsible for normal wear and tear.
- The person with a disability cannot be required to _____ modifications to common areas or the exterior of the apartment home.
- The person with a disability cannot be charged a _____ because of the modification; however, the owner can require the establishment of an escrow account to fund the removal of the modification.

You must take accommodation and modification requests seriously. Never _____ a request outright. Always follow HUD's standards for determining whether the request is reasonable.

The housing provider is typically responsible for costs associated with accommodations. And, when it comes to parking, HUD considers both changes in _____ and changes to the _____ of the parking lot to be accommodations.

Residents are usually responsible for the costs of modifications. However, if a building was constructed after _____ and is missing certain accessibility features, residents cannot be required to pay to make the home accessible.

Who does the work?

When a modification request is made, the owner or owner's representative may ask to review site plans and require that the work is completed according to _____ and in a professional manner. Modification requests cannot be denied because of a concern that the modification will not look attractive.



The community management can also offer to perform the work, but cannot insist on doing so as the law permits the resident to make these arrangements. Management can require proper licensing, building permits, and proof of insurance, including Workers Compensation. It is often a good idea for Management to offer to perform the work at a reduced cost to maintain the control of construction and modifications on its property.

If you determine that an accommodation or modification request is not _____, you should try and find one or more _____ that may help the resident. Always check with upper management before rejecting a request.

Maintain a list of all accommodations and modifications provided to all applicants and residents. Such a list will come in handy if you are accused of _____ against a resident with a disability.

Handling Requests



Please refer to the "Handling Requests" video transcript, available in the resources menu, for help completing this activity.

The three guidelines for when to request additional information are:

1 - The disability is obvious or known to you, and the need for the accommodation is apparent.	<hr/> <hr/> <hr/> <hr/> <hr/>
2 - The disability is obvious or known to you, and the need for the accommodation is NOT apparent.	<hr/> <hr/> <hr/> <hr/> <hr/>
3 - The disability is not obvious or known to you	<hr/> <hr/> <hr/> <hr/> <hr/>

The law does not require any formal procedures for requesting a reasonable accommodation or modification. However, having a formal process in place will be helpful to the prospect or resident as well as your community by making it easier to consider and respond to requests.



You can deny someone's request if they don't follow your process.

True

False

If you do not respond to a request within a reasonable amount of time, the _____ may be considered a _____ to provide a reasonable accommodation or modification. Your applicant or resident may choose to seek legal assistance or file a complaint with HUD.

Avoid any misunderstanding by communicating quickly and _____ with your applicant or resident about the status of their request.

Always ask for the help of your _____ when you receive a request.

Handling Requests for Service and Assistance Animals

In January 2020, HUD released new guidance to help multifamily professionals more easily navigate these specific types of requests.

The new best practices include:

- One procedure for _____ requests for service animals (consistent with ADA guidance).
- A different procedure for evaluating other kinds of assistance animals, like companion or emotional support animals.

Consideration of the _____ of assistance animal.

Hoarding

People who suffer from hoarding are protected under fair housing law, and are entitled to _____ in the same way people with other mental or physical disabilities are.

In general, you should not initiate conversations with residents with disabilities about what accommodations they may need. Instead, you should wait for them to make a _____. Hoarding is a little different because it is a case where you will likely need to initiate discussions with the resident because the situation is _____ or unsanitary and must be addressed.

Here are 5 steps to help you work with people with hoarding disabilities:

1	Make sure you and all employees understand that hoarding is a _____.
2	Document the _____ of the hoarder's home.
3	Involve your _____.

4	Give the resident a chance to _____ the situation.
5	Proceed with an _____, if necessary.

Summary

Points to Remember:

- Disabilities are mental or physical impairments that effect one or more major life activities. Not all disabilities are obvious.
- The law requires that reasonable accommodations and modifications be made to allow a person with a disability to fully enjoy their rental home.
- There are specific guidelines defined by fair housing laws to help determine which requests are reasonable and which are not.
- Depending on your area or the type of modification, different people may be responsible for the work and the costs of the modifications and undoing the work later.
- Most buildings must meet specific minimum requirements for accessibility.



ESSENTIAL COMPLIANCE STRATEGIES

Fill-in-the-Blank, True/False and Reflection
Questions to demonstrate your knowledge.

Introduction

Ensuring that your community consistently treats people fairly and otherwise complies with fair housing laws requires conscious planning and effort.

Training and raising awareness can help avoid intentional discrimination, but how can you guard against those tricky situations where intentions are good, but an action, policy, or procedure ends up appearing discriminatory or actually has a discriminatory effect?

Here, we will walk you through essential strategies that can help guard against discrimination and reduce the risk of fair housing claims against you and your community.

You will learn:

- How to apply compliance strategies to ensure prospective and current residents are consistently treated fairly.
- How to appropriately apply occupancy standards.

Training

All staff members who _____ with residents and prospective residents must be trained on fair housing laws. This includes anyone who works in occupied apartment homes or on the community grounds and may engage in a conversation with a customer.

All personnel should refresh their fair housing knowledge at least _____.

Don't forget about vendors and contractors! Anyone who could possibly _____ (interact) with your residents should be informed of your company's fair housing policy and asked to abide by fair housing laws.

Qualification Guidelines and Occupancy Standards

Most communities establish occupancy standards to determine the _____ number of people allowed to occupy an apartment home. Occupancy standards are necessary for reasons of public health and safety and to prevent _____.

The Fair Housing Amendments Act does not include specific occupancy standards. The law does, however, require that the standards established by owners and owner's representatives are _____ and reasonable.

The general rule of thumb used to define occupancy standards in rental housing is to allow _____ people per bedroom. HUD has stated that this guideline is reasonable in most cases.

If your community has floorplans with extra rooms that could be reasonably used as sleeping areas like a den or library, then your occupancy limits may need to be expanded to include these rooms.

When you are marketing floorplans with flexible space you must be _____ in your terminology and description. Marketing an apartment as a two-bedroom with a den one week and then calling it a three-bedroom the next week could get you into trouble for violating fair housing laws.

It is recommended that you:

- Review your occupancy standards with your company's _____ for approval. Be aware that state and local laws may exist regarding occupancy standards.
- Use the sample Qualification Guidelines & Occupancy Standards to get started.
- Put your Occupancy Standards and Qualification Guidelines in _____ and display them in your Leasing Center and Maintenance Office.
- Distribute your Occupancy Standards and Qualification Guidelines to all _____.
- Display the Equal Housing Opportunity symbol on all paperwork, advertising, and marketing materials.

- Display HUD's Fair Housing Poster in your Leasing Center and Maintenance Office.
- And, apply these standards _____ and fairly to all prospects and residents.

Responding to Inquiries

When asked for information regarding a certain type of people who may or may not live at your community, answer by saying:

"This community is an equal opportunity renter. We welcome anyone who completes an application, meets our qualification standards, and wants to live here."

If pressed further, state:

"If I answered that question, I'd be violating fair housing law. If you're not familiar with the law, you might want to read the explanation on our fair housing poster."

Do NOT invite them back to your community to see for themselves _____, or direct them to where they might find out the information _____. Doing so could be construed as discriminatory behavior.

Documentation

Documentation is extremely important when dealing with accusations of discrimination.

Should you ever be accused of discrimination, you must be able to _____ your decisions, policies, and practices, as well as demonstrate that all persons were treated the _____, regardless of membership in one of the protected classes.

Accordingly, your documentation should offer a full accounting of _____. Describe all events and actions taken, all people involved, and provide specific dates and times.

Use a form created expressly for this purpose, such as a _____.

Do not include any _____ of the customer (such as curly hair, dark skin, or strong accent) or of the _____ (such as small children or twin daughters). It is better not to mention any features that identify your customer as a member of a _____. Such descriptions could be interpreted as discriminatory.

To help remember the discussion with a prospect after their visit, a Leasing Consultant typically makes some notes on a _____. Be careful of what you write on the guest card. While you want to completely document the facts, you don't want to mention anything pertaining to a _____.

Maintaining Records



Please refer to the "Maintaining Records" video transcript, available in the resources menu, for help completing this activity.



Why would it be a good idea to note the date and time of customer visits on guest cards?

Recordkeeping Strategies

Recordkeeping strategies include:

- Use _____ for consistent documentation on all prospective residents who call or visit.

- Document all _____ activity on the guest card.
- Follow up both verbally and in writing with anyone whose rental application is _____.
- Keep an organized file of your apartment availability reports.
- Document the _____ and _____ of any rental rate changes.
- Keep all _____ on file. Be sure the work done, time completed, and technician's name are noted on the request.
- And, keep important documentation on file for at least _____ years, though preferably for _____ years.

Summary

Points to Remember:

- All staff members who come into contact with residents and prospective residents must be trained on fair housing laws.
- Display the Equal Housing Opportunity symbol on all paperwork, advertising, and marketing materials. Display HUD's Fair Housing Poster in your Leasing Center and maintenance office.
- If asked about the types of people living in your community, respond only that you are an equal opportunity renter. If pressed, simply say that you'd violate fair housing laws if you answered those types of questions.
- Consistent documentation and recordkeeping, in which you stick to "just the facts," will help if you ever need to address an accusation of discrimination.



APPLICANT SCREENING

Fill-in-the-Blank, True/False and Reflection Questions to demonstrate your knowledge.

Introduction

The applicant screening process is a frequent source of discrimination complaints. After all, when personal information is requested and especially when applications are declined, people wonder why.

Why do they need to see photo ID?

Why are they asking about criminal history?

Why did they turn me down?

It's easy for the applicant screening process to seem unfair to prospects. If the screening process isn't clearly explained and consistently applied, prospects may feel that their application has been denied due to race, national origin, religion, or another protected class. Here, you'll learn how to avoid the pitfalls related to applicant screening.

You will learn:

- How to follow best practices for applicant screening.
- How to implement HUD's guidance on criminal background checks.
- Do's and don'ts for verifying identification.

Screening Best Practices

Your company should have clear policies and procedures for determining which applicants are accepted to live in your community. Follow these policies and procedures at all times, and apply them _____ to all applicants.

Make sure all applicants understand selection criteria and related _____ and _____.



Applicant screening is an area in which it is particularly important to know and follow your state and local laws. Take the time to educate yourself. "I didn't know" will not be an acceptable defense should you face a discrimination claim.

Most importantly, be _____ in all your interactions with applicants. If you make an _____ to any policy or procedure, make sure you provide the same information and options to all applicants who are in the same situation.

It is natural to make friendly _____ with prospects during the application process. Making small talk is fine and even advisable. After all, developing _____ is a terrific way to deliver great customer service and differentiate your community.

However, think carefully about questions you ask or comments you make.

Criminal Background Checks

Criminal background checks are a common part of the screening process for various reasons, including the protection and safety of a community's residents and their property. However, criminal background checks must be conducted carefully to ensure that people are not _____.



As many as 100 million U.S. adults—or nearly one-third of the population—have a criminal record of some sort.

And, studies cited by HUD show that certain racial and ethnic _____ are arrested and convicted of crimes more than others. Therefore, it follows that certain criminal history policies could have a _____ on minority home seekers and make it difficult for them to find housing.

HUD's Guidelines for Criminal Background Checks

A community's policy should not automatically exclude someone with criminal convictions. Instead, the policy should take into consideration:

- The _____ of the crime. Was it a violent or a non-violent crime?
- The _____ of the crime. Was it a misdemeanor or a felony?
- How long ago the crime was _____. Was it recent or many years ago?

HUD's guidance does not mean that you must accept every applicant who has a _____.

A community can automatically exclude applicants and residents based on convictions for the illegal manufacture or distribution of a _____.

A community can also deny applicants whose criminal conduct may affect your ability to keep your residents _____.

HUD recommends conducting individualized _____ and considering the factors mentioned previously. HUD also recommends considering criminal history only after the applicant's other qualifications have been _____. Doing so decreases the risk of unintentionally discriminating.

A policy should not deny residency or otherwise discriminate against an applicant or resident based solely on an arrest record. An _____ for illegal manufacture or distribution of a controlled substance is not the same as a _____.

Verifying Identification

Verifying identification is another part of the screening process. Requiring _____ prior a tour is a common leasing office safety measure. In addition, it provides documentation

that prospects are who they claim to be and allows you to run the necessary _____ and _____ checks.

As with all screening processes, it's important to verify ID consistently, fairly, and _____. Asking for photo ID from one prospect and not another can cause fair housing trouble.

However, be mindful that it is better to ask for a "government-issued photo identification" rather than to ask specifically for a _____. Not everyone has a _____, and asking for one could be viewed as discriminatory.



What about photocopying applicants' IDs? Federal fair housing law does not prohibit copying IDs, but it may be prohibited by some state or local laws. Follow your company's policies and procedures when it comes to photocopying IDs.

If it is your policy to ask for a Social Security Number on your application and an applicant cannot provide one, considering asking for an Individual Taxpayer Identification Number (ITIN).

An ITIN is a _____ issued by the Internal Revenue Service to ensure that people pay taxes even if they do not have a Social Security Number. People who do not have a lawful status in the United States may obtain an ITIN. ITINs are not an immigration-enforcement tool.

Citizenship Status

Although not technically illegal under federal law, Grace Hill does not recommend asking applicants for _____ that they are lawfully in the United States unless you have valid business justifications for requesting such information.

Asking for such documentation—and sometimes even just asking questions related to immigration status—can be evidence of national origin discrimination, particularly under some state law.

If an applicant can't provide a Social Security number, ITIN, or other documentation such as a visa to verify identity or run credit or background checks, it may be reasonable to deny the application for _____.

Check with your company policy, supervisor, or legal counsel any time you are not sure how to proceed.

Summary

Points to Remember:

- Be consistent in all your interactions with applicants. Follow your company's policies and procedures.
- Criminal background checks should take into consideration the nature of the crime, the severity of the crime, and how long ago the crime was committed.
- Unless specifically required by your company's policies for a valid reason, it is recommended that you do not ask applicants for proof that they are lawfully in the United States. In fact, doing so is illegal under some state laws.
- If an applicant does not have a Social Security Number, you may ask for an ITIN, visa, or other suitable information to verify identity or run credit or background checks.



WORKING WITH CUSTOMERS

Fill-in-the-Blank, True/False and Reflection
Questions to demonstrate your knowledge.

Introduction

Every day, you have the opportunity to help other people feel at home. Whether it's interacting with current residents or welcoming prospective residents, working with customers is an important responsibility.

Fair housing laws require you to treat all customers fairly, equally and consistently, without regard to any of the seven protected classes.

Here, you'll learn strategies for selling your community and providing excellent customer service while complying with fair housing laws.

You will learn:

- Best practices for leasing apartment homes and providing customer service.
- Strategies to avoid discriminatory behavior when working with families with children and expectant mothers.

Touring and Selling Best Practices

Consistency is key when dealing with fair housing issues. You must be careful to consistently use the same sales techniques, make the same recommendations, and follow the same procedures for each prospective resident or resident you encounter.

Working with prospective residents:

- Complete a _____ for each and every prospect.
- Have a defined _____.
- Offer each prospect the same _____.

- If you require a _____ from prospects to tour your community, you must get one from every prospect.
- If a prospect's rental application is denied, you must _____ with them both verbally and in writing.

Working with residents:

- If you have a prospect who does not meet the _____ but you let him or her sign a lease by pre-paying 6 months' rent, you must offer this option to everyone who does not meet your income requirements.
- If you waive a _____ for one resident in a certain situation, you must waive them for all residents in a similar situation who pay late.
- If you send a _____ to a resident for a specific violation, you cannot give another resident in a similar situation "one more chance."
- If you tow one resident's car for having expired tags, all cars with expired tags must be towed.
- If you charge one resident for a certain type of _____ to their apartment home, you must charge all residents who cause the same type of damage.

Attending to service requests:

- Ensure that you fill out a _____ for each resident call or visit.
- Address service requests systematically. Clearly distinguish emergency requests as priorities, and then attend to others in the order in which they were received.
- Note the _____ and _____ the service request was received and completed.

Do not make assumptions about what an individual may or may not be interested in viewing. Offer options and solutions, but let the prospect make the

_____. Letting prospects make the decision avoids the illegal practice of _____.

One of the most common reasons testers are called to apartment communities is false statements about _____. Some of these statements could easily result from an honest mistake—like not knowing the number of vacant units in your community.

To avoid confusion, each person working in the Leasing Center should have accurate, up-to-date information on apartment _____. Document your interactions with customers and maintain records so that, if asked, you can prove that you quoted availability accurately.

Families with Children

A community may not discriminate against families in which one or more children under the age of 18 live with a parent, legal guardian, or a designee of the parent or legal guardian with the parent or guardian’s written permission.

The familial status category includes families with children, single parents, unmarried parents, expectant mothers, and those in the process of obtaining legal custody of a child under 18 years of age.



Please refer to the “Families with Children video transcript, available in the resources menu, for help completing this activity.

DO NOT SAY	INSTEAD SAY
“How many adults and children will be residing in your apartment home?”	_____
“How many children are in your family?”	_____
“How old are your children?”	_____

<p>"Children may not skateboard on community property."</p>	<hr/> <hr/> <hr/> <hr/> <hr/>
<p>"Children under the age of 14 are prohibited."</p>	<hr/> <hr/> <hr/> <hr/> <hr/>

Expectant Mothers

Federal fair housing laws require that you do not take an expectant mother's _____ into consideration when suggesting available apartment homes. Simply stated, a pregnant woman cannot be forced to accept a different floorplan than a woman who is not pregnant, nor may she be discriminated against in the terms of housing in any way.



Consider this example:

Your occupancy guidelines allow only two persons to occupy a one-bedroom apartment home. A couple desires to lease a one-bedroom apartment home and the woman is visibly pregnant. Although it is expected that this household will soon grow to be three persons in size, you are obligated to consider the pregnant woman as one individual.

What happens when the couple from the example becomes a family of three, and exceeds your occupancy guidelines?

In this situation, most fair housing attorneys will advise you to let the family complete their lease term in the one-bedroom apartment home, then transfer to a larger apartment when the lease _____.

Disparate Impact and Domestic Violence

VAWA

Statistics show that survivors of domestic violence are most often women (85% of cases). It is not surprising that when victims of domestic violence are evicted, or denied access to housing, this is viewed as discrimination based on _____.

The Violence Against Women Act, or VAWA 2013, states that being a victim of domestic violence or stalking cannot be used to _____ or admission to covered housing programs including public, Section-8, and Low-Income Housing Tax Credit communities.

All _____ and owners and managers participating in the covered housing programs must comply with VAWA 2013. In addition, state and local laws may affect the housing rights of survivors of domestic violence.

Local Nuisance Ordinances

Local nuisance ordinances are _____ that intend to keep communities crime-free and increase property values.

A nuisance is defined as something that interferes with health, safety, or enjoyment of property, or something that offends common decency.

Many local nuisance ordinances fail to take _____ into consideration. This places victims of domestic violence in a difficult situation. Do they call for help, and possibly get evicted from their home? Or do they stay silent, putting their own safety at risk?

Summary

Points to Remember:

- The law protects any family consisting of one or more children under the age of 18 living with a parent, legal guardian, or one in the process of securing legal custody of one or more children under the age of 18.
- Expectant mothers are also protected as members of the familial status protected class.
- You must treat all customers in a fair, equal, and consistent manner.
- If you make an exception for one resident, you must make the same exception for others in the same situation.