

Emerging Fair Housing Trends in Housing Credit

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Disparate Impact

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Current pieces of litigation

- ~Texas Department of Housing and Community Affairs v. Inclusive Communities Project
- ~Ellis v. City of Minneapolis
- ~Burbank Apts Tenant's Assoc. v Khargman



Fair Housing and Disparate Impact

~Fair Housing applies to almost all housing in the US, regardless of whether it is owned, market-rate or assisted.

By definition: Single Room Occupancy's (SRO) can be limited to one person or a single gender provided the housing program's establishing documents establish these limitations

- The only exception is owner-occupied dwellings of 4 or less rental units.



Fair Housing and LIHTC Communities

Section 42 Regulations require LIHTC properties be made available for "General Public Use"

- to all who would otherwise qualify

H.R. 3221 allows for occupancy restrictions for:

- those with special needs
- federal and state supportive housing
- artistic and literary activities

Fair Housing Laws still apply!



Adverse Judgements

CAUTION:

Adverse Judgments against Owners at LIHTC properties for Fair Housing violations are considered non-compliance.



Fair Housing Act Compliance

HUD and Department of Justice report administrative and legal actions to state agencies, according to the memorandum of understanding among:

- Department of the Treasury
 - HUD
- Department of Justice



Fair Housing Act Compliance

~State Agencies MUST report any adverse judgements to the IRS using form 8823

~IRS notified the Owner directly if the violation will result in recapture of credits

~State Agencies contact HUD directly if they find a violation during compliance monitoring



Protected Classes

Discrimination in the sale, rental, or conditions of occupancy is prohibited on the basis of:

- Race
- Color
- Sex
- Religion
- National Origin
- Disability
- Familial Status



Intentional vs. Non Intentional Discrimination

Intentional (disparate treatment)- most common; requires direct/implied proof of intent:

An individual or protected group has been treated less favorably or singled out compared to others in a similar situation.

Non- Intentional (disparate impact) – requires proof of impact on protected class of different treatment

A policy or practice which seems equal but has statistical (substantially) negative effect on a protected class.



How'd we get here?

Texas Dept. of Housing and Community Affairs v. Inclusive Communities Project

Claim was made that the Texas Housing Agency used criteria in its QAP which resulted in a concentration of the allocation of credits in minority areas- creating difficulty for minorities to find affordable housing in non- minority areas.

statistics found disparate impact by the QAP requirements for allocation of housing credits in minority areas therefore there was a pattern of segregation.



The US Supreme Court upheld the validity of HUD's Disparate Impact and Discriminatory Effects by a vote of 5-4

Opinion recommends "safeguards" to protect "against abusive disparate impact claims"

1. Statistical disparity is in enough to support disparate impact.
2. "Robust causality requirement" means the complainant must be able to demonstrate that the challenged practice is the cause of the disparate impact.
3. Defense that the policy is legitimate.
4. The focus of the ruling is on the removal of the "artificial, arbitrary and unnecessary barriers."
5. Racial quotas can not be used to avoid liability – violation of equal protection clause.
6. Complainant must be able to demonstrate a less discriminatory alternative..



Here's HUD's explanation of how their rule works:

- Individual files a Fair Housing complaint;
- HUD determines whether a “prima fascia” case of discrimination has been stated.

In plain English: this is prior to any investigation, and HUD is simply determining “at first glance” whether the complainant has stated a case for discrimination



Disparate Impact and our policies and rules

- The Owner/Managing Agent must show they have a legitimate and non-discriminatory interest in the policy or procedure they are following.
- Even if the Owner/Managing Agent establishes their legitimate and non-discriminatory interest in the policy or procedure, the complainant may still prevail on their complaint by demonstrating that the Owner/Managing Agent could have done something LESS discriminatory.



Definitions:

- DISPARATE IMPACT:
A community/organization will not hire women to be maintenance technician:
- This is an example of overt discrimination and it has a disparate impact against women
- DISCRIMINATORY EFFECTS:
A community/organization has a minimum weight requirement of being able to lift 65 pounds to be a maintenance technician
- There's no overt attempt to exclude women, but that is the effect



Examples:

DISPARATE IMPACT:

~A landlord brought an action for the City enforcement of health and safety codes.

- Claim was dismissed because the city was able to demonstrate legitimate government interest and Complainant failed to explain the relationship between the policy and racial disparity



Ellis v. City of Minneapolis



Examples:

DISPARATE IMPACT:

~A Section 8 Owners decides NOT to renew his HAP contract at end of term.

Owner provided all required notices as required by and to HUD/ State agencies

Current tenant's protected by enhanced vouchers

Law suit claimed non renewal violated FHAct and Mass. Laws because non renewal has disparate impact in present/future minority tenants.



What to keep an eye out for:

Admission policies and occupancy standards which restrict housing opportunities~

- ✓ criteria for awarding benefits – like the LIHTC program
- ✓ building rules and regulations
- ✓ credit score screenings
- ✓ drug/ criminal backgrounds
- ✓ residency preferences

Determine if there are "potential" disparate impact on protected classes

Outline interests of these standards- are there any with less discriminatory impact



What we can look for:

- HUD has adopted "balance shifting" approach similar to the **Inclusive Communities case**:
- Plaintiff's must identify policy or practice that has disparate impact on protected class under FHAct
- Defendant must be able to show "legally sufficient justification" for the policy or practice.
 - Practice is necessary to achieve one or more substantial, legitimate non discriminatory interest;
 - Interest could not be served by less discriminatory practice;
 - MUST have evidence not speculative "gut" feeling;
 - Plaintiff must show those interests could be served by practice with a less discriminatory effect.



Your thoughts on these policies?

Your policy states:
*Home businesses for a fee or no fee,
 within the community boundaries are prohibited.*

The Site Manager must be consulted and written permission obtained for residents wishing to care for ("baby-sit") any children not of the immediate family for a temporary period of time. The care of children not of the immediate family for a term of more than five (5) days is not allowed.

Is there a disparate impact in this policy?



Your thoughts on these policies?

Your policy states:
All rents must be paid on line/ electronically through the payment portal on the company's web site.

Is there a disparate impact in this policy?



Your thoughts on these policies?

Your Policy States:

If the police are called to the property because of any type of disturbance or violation, the resident(s) involved may receive a 30 day written notice to lease termination?

Is there a disparate impact in this policy?



Your thoughts on these policies?

Angeles

Nuisance Abatement Ordinance

Any person who causes, maintains or permits to be caused or maintained a public nuances on any property shall be liable for a civil penalty for each day or part thereof that said public nuisance occurs.

Is there a disparate impact in this policy?



Conclusion:

Disparate Impact cases can be used to challenge more and more polices in housing

Both sides of the complaint must be able to demonstrate the solid proof of their position

As of now there are no real guidance on violations.





Housing Protections for Victims of Domestic Violence, Sexual Assault, and Stalking: VAWA and Other Laws

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Domestic Violence Statistics

- ▶ Most rapes committed against women are committed by a spouse, intimate partner or someone they know (friend, family member, acquaintance)
- ▶ More than half of rapes take place between 6 pm and 6 am
- ▶ Domestic violence is most likely to take place between 6 pm and 6 am
- ▶ More than 60% of domestic violence incidents happen at home
- ▶ Domestic violence is the third leading cause of homelessness among families



Your Housing Experience

- ▶ Domestic violence victims often have poor landlord histories
- ▶ Domestic violence victims sometimes have arrest records or convictions stemming from incidents of domestic violence
- ▶ Domestic violence results in lease violations
- ▶ Victims frequently let the abuser come back
- ▶ Other residents can be jeopardized by the abuser's actions towards the victim
- ▶ Intervening with victims and abusers can be dangerous



Statistics + Experience Tell Us



Housing and Domestic Violence Intersect



Housing Credit Properties and the Law

- ▶ The 2013 Reauthorization of the Violence Against Women Act (VAWA) extended its protections to victims who reside in Housing Credit Properties
- ▶ Each agency is to develop its own rules and policies to comply with VAWA (HUD has a proposed rule out, RD had one and withdrew it, IRS has not issued a rule)
- ▶ Many state and local laws have similar and sometimes additional housing protections for victims residing in any type of housing (even conventional).

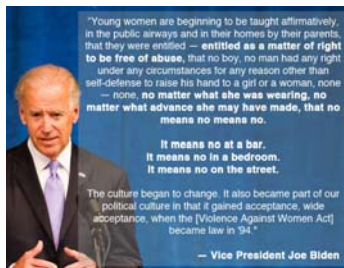


Violence Against Women Act (VAWA) Reauthorized in 2013

2013

2005

1994



VAWA Provisions

Provisions from 2005 remain	Provisions added in 2013
<ul style="list-style-type: none"> • Protections for victims applying for HUD subsidized housing. • Protections against evictions and subsidy terminations. • Safety moves for victims w/Section 8 vouchers. • Lease bifurcation to remove the perpetrator from the unit. • Rules for proving domestic violence, dating violence, or stalking. 	<ul style="list-style-type: none"> • Coverage of more federal housing programs. • Protections to victims of sexual assault and LGBT victims. • Rights for victims remaining in housing after lease bifurcation. • Expansion of documentation rights to show abuse. • What landlords may do when there are conflicting certifications. • Development of model plans for use for emergency transfers. • Notification concerning VAWA housing rights at three critical junctures in multiple languages.



VAWA: Programs Covered

Programs covered 2005	Programs added 2013
<p>Public Housing Section 8 vouchers Project-based Section 8 Section 202 Supportive Housing for the Elderly* Section 811 Supportive Housing for People with Disabilities.</p> <p><small>*Originally added by HUD regulations. Now provided for in the VAWA 2013 statute.</small></p>	<p>Other HUD programs</p> <ul style="list-style-type: none"> • § 236 Multifamily rental housing • § 221(d)3 BMIR (Below Market Interest Rate) • HOME • HOPWA (Housing Opportunity for People w/AIDS) • McKinney-Vento (Homelessness Programs) <p>Department of Agriculture</p> <ul style="list-style-type: none"> • Rural Development (RD) Multifamily <p>Department of Treasury/IRS</p> <ul style="list-style-type: none"> • Low-Income Housing Tax Credit (LIHTC)



VAWA Protects People Subject to:

Domestic violence: Any felony or misdemeanor crimes of violence committed by a current or former spouse, intimate partner, person with whom the victim shares a child, person who is or has cohabitated with the victim

Dating violence: Violence committed by a person who is/was in a social relationship of intimate nature with victim as determined by considering three factors

Sexual assault: Any nonconsensual sexual act prohibited by law

Stalking: Any conduct directed toward a specific person that would cause a reasonable person to fear for safety or suffer substantial distress



Covered Housing Provider Must:

- ▶ Not discriminate against victims and “affiliated individuals” of the victim (immediate family or any individual living in the household)
- ▶ Provide applicants and tenants notice of their VAWA rights
- ▶ Use a model “emergency transfer plan” (as developed by the regulating agency)
- ▶ Keep victim’s information confidential
- ▶ Comply with court orders regarding property rights



Admissions and Evictions

- ▶ Housing provider cannot deny an applicant housing assistance or evict/terminate assistance for a tenant on the basis that s/he is or has been a victim.
- ▶ Crimes against a victim directly relating to the violence/abuse are not grounds for evicting the victim or terminating his/her rental subsidy.
- ▶ An incident of actual or threatened violence/abuse does not constitute a “serious or repeated lease violation” or “good cause” for evicting the victim or terminating his/her rental subsidy.



Proving Abuse

- ▶ Covered housing provider is free to take tenant at his/her word (self-certification), or can ask tenant to prove violence/abuse. (HUD considers self-certification enough – other agencies may or may not take that position)
- ▶ Any request by covered housing provider for proof must be in writing.
- ▶ Tenant has 14 business days from covered housing provider’s request to provide proof.
- ▶ Covered housing provider is free to grant extension.



Covered Housing Provider Can:

- ▶ Authorize lease bifurcation
- ▶ Determine whether to evict/terminate assistance based on non-VAWA violation or “actual and imminent” threat
- ▶ Require 3rd party documentation re: violence or abuse when there is a dispute as to who is the abuser and who is the victim



Lease Bifurcation

- ▶ Split the lease in order to remove only the abuser and allow victim and others to stay subject to program requirements and state/local law.
- ▶ Let remaining tenants continue to reside under existing lease or revise lease depending on eligibility for continued occupancy.
- ▶ If abuser was only tenant on housing assistance, give remaining tenant(s) “reasonable time” of 60 calendar days to establish eligibility for same program or other covered program and another 30 calendar days to find other housing.

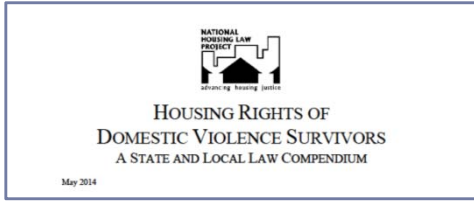


Emergency Transfer

- ▶ Each federal agency must adopt a model emergency transfer plan to be used by housing providers.
- ▶ Transfer plan must allow victim tenants to transfer to another available and safe unit assisted under covered housing program if
 - 1) tenant expressly requests the transfer and
 - 2) tenant reasonably believes that s/he is threatened with imminent harm from further violence if s/he remains or tenant is a victim of sexual assault that occurred on premises within 90 days before request
- ▶ Transfer plan must ensure “strict” confidentiality so that housing provider does not disclose location of new unit to abuser



State and Local Laws



Source: National Housing Law Project



State Law Provisions

- ▶ Most state laws protecting victims of domestic violence include victims of sexual assault and stalking in their definitions.
- ▶ Rights granted take effect when the victim obtains an order of protection from the court
- ▶ Documentation required by the court varies from state to state – but documentation is always required.



State Law Highlights – a sample

Protections for Domestic Violence Victims/Survivors	A	A	A	F	K	M	N	N	N	T
	L	Z	R	L	Y	S	O	E	Y	C
Bars abuser from entering residence	x	x	x	x	x	x	x	x	x	x
Prohibits housing discrimination			x							x
Early lease termination w/no penalties	x								x	x
Landlord must change locks	x	x								x
Landlord must refuse access to abuser	x									
Abuser liable to landlord for all losses due to victim's breach of lease	x									x
Evict abuser only	x		x		x	x				x
Funds to help victim find alt. housing					x					
Abuser must pay victim's housing costs	x					x	x			x
Abuser must pay victim's moving costs							x			
Immunity from liability for landlord acting in good faith	x	x								x
Protects tenant's right to call police	x	x								



Nuisance Ordinances

aka/Crime Free or Disorderly House Laws

- ▶ A growing national trend
- ▶ Property is deemed a “nuisance” based on number of police calls
- ▶ Chilling effect on enforcement of orders of protection and willingness to call police
- ▶ Force landlords to discriminate, running afoul of federal, state and local anti-discrimination protection including laws protecting a tenant’s right to call the police in the event of domestic violence



VAWA Challenge: What Would You Do?



VAWA Challenge: Sandy & Bill

Sandy and Bill are a married couple at an LIHTC property. Bill is physically abusive and threatens Sandy with a loaded gun one evening. Sandy seeks a restraining order, a divorce and to bifurcate her lease. She is successful at all three. Although she is a full-time student and not LIHTC eligible on her own, she may stay because she is protected under VAWA.

True or False.

What steps should be taken?



VAWA Challenge: Katrina & Sam

Katrina and her boyfriend Sam are living together. Regular complaints about noise in the apartment lead to Sam's eviction when Katrina discloses and documents that she has been a victim of abuse. The violence also resulted in the excessive noise. The lease was bifurcated and Sam was evicted while Katrina was allowed to stay. Shortly thereafter, Paul, another resident, reported that he went to do laundry and found wet clothes in the washer. After waiting an hour, Paul returned and put the wet clothes on top of the washer to free up the machine for his use.



VAWA Challenge: Katrina & Sam

The clothes happened to be Katrina's and when she finally returned to the laundry room, she found Paul moving his clothes to the dryer. She screamed at him and began swinging a broom that was in the laundry room at him, eventually breaking the broom and gashing his face and arm with the broken handle. A police report supported Paul's story.

True or False?

- 1) As a victim of domestic violence herself under a bifurcated lease, Katrina is covered under VAWA and cannot be evicted.
- 2) Because Paul is a man, he cannot seek protection under VAWA.



VAWA Challenge: Mina

Mina applied for an apartment at a housing credit property and was asked to complete an application.

- ▶ Applicants were required to disclose "all criminal history."
- ▶ Mina was arrested twice for assault, both times because officers believed her abuser, whose English was superior to hers.
- ▶ Mina disclosed the arrests on her application, but noted that the charges were dropped in both cases.
- ▶ The property denied Mina's application because of her "past criminal activity."

Was this the right decision?



Final Thoughts

Although some states have issued guidance on complying with VAWA, Treasury/IRS has not.

Meanwhile:

- ▶ The requirements of the law should be followed – fair housing cases can be brought based on disparate impact regardless of whether or not the IRS or the state has required you to do something
- ▶ Exception: You cannot implement an Emergency Transfer Plan until and unless the IRS and/or your state provide you with a sample plan.
- ▶ Ensure you are following state and local laws regarding housing protections for victims



Housing Protections for Victims: VAWA and Other Laws






SHCM® Webinar Series 11.12.2015
Emerging Fair Housing Trends in Housing Credit:
Case Law Decisions May Impact your Management Decisions

Presented by: Heather Staggs, CPO®, FHC®, SHCM®, AHM
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Violence Against Women Act (VAWA) Case Law

Why does Domestic Violence Impact Management Decisions? 

- **1 in 3** women and **1 in 4** men have been victims of physical violence by an intimate partner within their lifetime¹.
- **1 in 7** women and **1 in 18** men have been stalked by an intimate partner during their lifetime to the point in which they felt very fearful or believed that they or someone close to them would be harmed or killed¹.
- Domestic Violence is a gender issue based on statistics alone. Because gender is federally protected under the federal Fair Housing Act, and you must comply with the Fair Housing Act.
- What seems like a "good management decision" could potentially have unintended effects on domestic violence victims.
- Management policies or decisions could cause women to have to make the horrifying choice to either stay with their abuser and not call the police, or calling the police, and risk losing their housing.

¹ NCAADV. (2015). Domestic violence national statistics. Retrieved from www.ncadv.org

Alvera et al vs. C.B.M. et al (Oregon):

- This was the very first fair housing case dealing with domestic violence evictions as a form of sex/gender discrimination
- In this case, the husband physically assaulted his wife and was subsequently arrested
- The victim obtained a restraining order, requested a transfer and that her husband be removed from the lease
- The landlord informed the victim that she was being evicted due to a zero tolerance policy against violence
- The victim was awarded an undisclosed amount in addition to \$25,628.75 in attorney fees. HUD required a change in management's policies as they relate to domestic violence



HUD vs. Norristown PA

- Complaint Filed in June of 2013 alleging that the municipality discriminated against females by enacting 2 separate a disorderly behavior ordinance
- The ordinance held landlord responsible to evict residents who were cited for disorderly behavior to include domestic disturbances.
- If the owner/landlord did not evict they would be subject to fines and possible loss of their rental licenses



HUD vs. Norristown PA

- The Municipality opposed the complaint as they felt that both ordinances were "gender neutral" and therefore they did not have a disproportionate on either females or female victims of domestic violence.
- Although they contested the complaint they agreed to enter into a 2 year conciliation agreement.
- Pay \$495,000 to the victim



What did the agreement require?

- Required to repeal the ordinance
- All City employees we required to receive a copy of the conciliation agreement and a copy must be made available to the general public upon request
- The Norristown Administrator, City Council Members, Director of Code Enforcement, Chief of Police and all other persons who have interaction with victims of crime or abuse attend fair housing training and then continue to attend annual fair housing training
- Develop a community education and outreach program about the Fair Housing Act as it relates to rights under the law



What Did the Agreement Require?

- Norristown had to partner and seek guidance from a local domestic violence advocacy group to develop a community service activity that would raise awareness about domestic violence. They also had to promote and publicize the activity.



Bouley vs. Young-Sanbourin (Vermont)

- A female resident was beaten by her husband
- The husband was arrested and never returned to the home.
- The landlord pursued an eviction after meeting with the female resident.
- In the complaint the resident indicated that the eviction was solely due to the resident's reaction to being assaulted, and that this reaction did not conform to the landlord's gender stereotypes about how a female victim should act in addition to the fact she refused to listen to the landlord's attempt to discuss religion with her after the assault.
- A settlement was reached after the Judge heard the case.



Warren vs. Ypsilanti Housing Commission (Michigan)

- This case , similar to the case in Oregon involved a zero tolerance situation where a female resident was served an eviction following a police call to her apartment when a former boyfriend arrived unannounced and assaulted her.
- Again, a settlement was reached and management had to change their policies.



ACLU vs. St. Louis Housing Authority (Missouri)

- Female resident was a victim of continual domestic violence.
- Couple broke up but ex continued to stalk, harass and threaten the female resident including causing damage to her apartment windows and the apartment.
- The resident obtained a restraining order provided a copy to her landlord who then subsequently issued a notice of lease violation.
- Housing authority refused to allow the victim to transfer to another unit to conceal her identity claiming tenant was responsible for her domestic violence situation.
- The resident had actually paid for the damage done by perpetrator even though he continued to violate restraining order and cause damage.
- The Housing Authority neglected to ban the alleged abuser from the property or file criminal or civil complaints against him.
- The Settlement reached allowed the resident (victim) to transfer to undisclosed apartment, refund her costs of repairs to windows and other damage done by abuser, and required the HA employees to take domestic violence training and required that the HA ban abuser from property.



Blackwell vs. HA Housing LP (Colorado)

- Tenant was beaten, stabbed and raped by an ex-boyfriend in her Project Based Section 8 unit.
- As she feared for her safety, she asked her landlord to allow her to transfer to another property but her landlord refused.
- Fearing for her safety and that of her children, she moved out of her apartment and went into hiding with friends and family until her ex was caught and arrested three months later.
- Case was settled for \$60,000 and the management agent was forced to change their policies.



ACLU v. Northend Village:

- The Resident's ex-boyfriend harassed and stalked her causing her to seek a protection order.
- The ex was charged for stalking and damaging the residents windows and property; however, the landlord filed eviction against the resident for failure to supervise her guests. She was not home at the time of the incident.
- Settlement reached included monetary damages and attorney fees in addition to requiring the landlord not to evict or discriminate against individuals because they have been the victims of domestic violence, dating violence, sexual assault or stalking, regardless if the abuser is residing in the tenant's household.



How do you comply?


- Do not give victims eviction notices solely due to criminal activity related to them being a victim of domestic violence.
- Allow for locks to be changed
- Acknowledge protection orders when a victim presents the order to you
- Protect residents identity and address. Do not release information to anyone unless the resident has given permission




Final Thoughts...

- Domestic violence is not a lease violation
- Do not implement "zero tolerance" policies
- Do not implement "3-strikes you are out" policies
- If you have questions about domestic violence or suspect someone may be a victim, please contact the National Domestic Violence Hotline at 1-800-799-SAFE (7233)






Families with Children Case Law



Centennial, Colorado Case


- An apartment community in Centennial Colorado published a notice in their monthly resident newsletter which set the following rule:
"All children must be supervised by an adult at all times while playing outside. No sports activities, skateboarding, roller-blading, or general extracurricular activities are to take place in our community. If we see anyone violating any of the above activities or see any unsupervised children they will be sent home immediately."

Source: hud.org



Centennial Colorado, Case

- The property to resolve allegations of discrimination entered into a Conciliation Agreement
- As part of the agreement property managers were required to design and build the play area, which had to be accessible to persons with disabilities
- All property staff was required to undergo fair housing training within a year; and
- The property management company was required amend its policies to comply with the Fair Housing Act regarding familial status and distribute the new rules to employees and residents



Napa California Case

- Case involved seven affected families
- Allegations include the manager cursing at the children on the property if he found them playing outside without adult supervision
- When he found the children unaccompanied, he required that they go the management office and sit on the floor. Once there, he required the children to clean the office toilet and pick up trash around the property. In addition, threatened them, telling them that their families may be evicted if they did not comply with his instructions.



Napa California Case

- During the investigation it was also discovered that the property also had a rules barring children from using the swimming pool during particular hours.
- Under the terms of the conciliation agreement, the owners and manager of the apartment community were required to:
 - Pay Fair Housing of Napa Valley \$3,750;
 - Waive four months of rent for five of the seven families (a total monetary value of \$19,000);
 - Pay two former resident families a total of \$7,000;
 - Eliminate the rule that limits pool usage by children during the day; and
 - Obtain fair housing training for employees.



Lenexa, Kansas Case

- The apartment community allegedly instituted a policy that “prohibited children under the age of 16 from freely using the common areas of the property”
- The rules allegedly required children to be supervised by an adult at all times and prohibited the children under the age of 16 from playing anywhere on the property except the playground. They were also prohibited from playing any team sports on the property, and from riding bicycles, skateboards, or scooters on the property
- Management also allegedly refused to renew one of the family’s leases as retaliation

Source: hud.org



Lenexa, Kansas Case

- The apartment community in Lenexa, Kansas, together with their named partner and agents, agreed to pay \$170,000 to settle a lawsuit
 - Under the proposed consent decree, the defendants paid \$60,000 to the family that initiated the original complaint filed with HUD, \$100,000 into a victim fund to compensate other aggrieved families and \$10,000 to the federal government as a civil penalty.
 - In addition, the proposed consent decree prohibits the defendants from discriminating in the future against families with children and requires the defendants to receive training on the requirements of the FHA.



What Does HUD Have to Say on the Issue?

- HUD Assistant Secretary Gustavo Velasquez of Fair Housing and Equal Opportunity said, "Overly restrictive housing policies for families with children are illegal, and prevent them from fully enjoying the place they call home. HUD will continue to work with the Department of Justice to take action against property owners and landlords whose policies violate the Fair Housing Act."



Families With Children Impact on Management Decisions

- Use caution not to implement policies involving children
- Ensure that policies are not overly restrictive
- Ensure violations are not punishable by manual labor





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