

# Fair Housing and Service Animals

By: Judy Cook  
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**2015**  
BROKER/OWNER  
RETREAT



## Fair Housing and Service Animals



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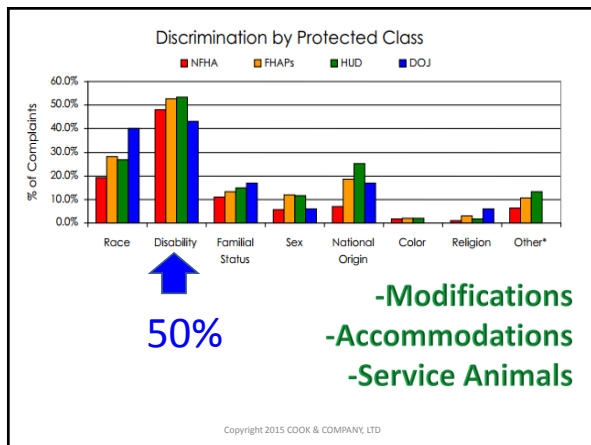
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## Modifications & Accommodations

- **Modifications**
  - Physical changes to the dwelling unit
  - Tenant generally pays
- **Accommodations**
  - Changes to policies and procedures

**As in...**  
**allowing a Service Animal**

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## To grant, or not to grant... a “reasonable accommodation”

- Is the disability **and** the need obvious?
  - If **yes**, forget about it...
- If **no**, you may request **verification**
  - Of **disability** and/or **need**
  - Careful not to ask too many details... just enough
  - By a **“Qualified individual”**

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### “Reasonable Accommodations”

- Free the tenant from a rule, policy, or procedure that interferes with the person’s use and enjoyment of the dwelling.
- Enhance the tenant’s quality of life by eliminating or reducing the effects of the disability.
- Assist the tenant in satisfying the essential requirements of tenancy in the same way as someone without a disability can.

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### ADA vs. Fair Housing



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### “Service Animals”



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U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-2000

OFFICE OF FAIR HOUSING  
AND EQUAL OPPORTUNITY

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**SPECIAL ATTENTION OF:**

HUD Regional and Field Office Directors  
of Public and Indian Housing (PIH); Housing;  
Community Planning and Development (CPD), Fair  
Housing and Equal Opportunity; and Regional Counsel;  
CPD, PIH and Housing Program Providers

FHEO Notice: **FHEO-2013-01**  
Issued: April 25, 2013  
Expires: Effective until  
Amended, Superseded, or  
Rescinded

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Subject: Service Animals and Assistance Animals for People with Disabilities in Housing and HUD-Funded Programs

1. **Purpose:** This notice explains certain obligations of housing providers under the Fair Housing Act (FHA), Section 504 of the Rehabilitation Act of 1973 (Section 504), and the Americans with Disabilities Act (ADA) with respect to animals that provide assistance to individuals with disabilities. The Department of Justice's (DOJ) amendments to its regulations<sup>1</sup> for Titles II and III of the ADA limit the definition of "service animal" under the ADA to include only dogs, and further define "service animal" to exclude emotional support animals. This definition, however, does not limit housing providers' obligations to make reasonable accommodations for assistance animals under the FHA or Section 504. Persons with disabilities may request a reasonable accommodation for any assistance animal, including an emotional support animal, under both the FHA and Section 504. In situations where the ADA and the FHA/Section 504 apply simultaneously (*e.g.*, a public housing agency, sales or leasing offices, or housing associated with a university or other place of education), housing providers must meet their obligations under both the reasonable accommodation standard of the FHA/Section 504 and the service animal provisions of the ADA.
2. **Applicability:** This notice applies to all housing providers covered by the FHA, Section 504, and/or the ADA<sup>2</sup>.

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<sup>1</sup> Nondiscrimination on the Basis of Disability in State and Local Government Services, Final Rule, 75 Fed. Reg. 56164 (Sept. 15, 2010) (codified at 28 C.F.R. part 35); Nondiscrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities, Final Rule, 75 Fed. Reg. 56236 (Sept. 15, 2010) (codified at 28 C.F.R. part 36).

<sup>2</sup> Title II of the ADA applies to public entities, including public entities that provide housing, *e.g.*, public housing agencies and state and local government provided housing, including housing at state universities and other places of education. In the housing context, Title III of the ADA applies to public accommodations, such as rental offices, shelters, some types of multifamily housing, assisted living facilities and housing at places of public education. Section 504 covers housing providers that receive federal financial assistance from the U.S. Department of Housing and Urban Development (HUD). The Fair Housing Act covers virtually all types of housing, including privately-owned housing and federally assisted housing, with a few limited exceptions.



- 3. Organization:** Section I of this notice explains housing providers' obligations under the FHAct and Section 504 to provide reasonable accommodations to persons with disabilities<sup>3</sup> with assistance animals. Section II explains DOJ's revised definition of "service animal" under the ADA. Section III explains housing providers' obligations when multiple nondiscrimination laws apply.

## **Section I: Reasonable Accommodations for Assistance Animals under the FHAct and Section 504**

The FHAct and the U.S. Department of Housing and Urban Development's (HUD) implementing regulations prohibit discrimination because of disability and apply regardless of the presence of Federal financial assistance. Section 504 and HUD's Section 504 regulations apply a similar prohibition on disability discrimination to all recipients of financial assistance from HUD. The reasonable accommodation provisions of both laws must be considered in situations where persons with disabilities use (or seek to use) assistance animals<sup>4</sup> in housing where the provider forbids residents from having pets or otherwise imposes restrictions or conditions relating to pets and other animals.

An assistance animal is not a pet. It is an animal that works, provides assistance, or performs tasks for the benefit of a person with a disability, or provides emotional support that alleviates one or more identified symptoms or effects of a person's disability. Assistance animals perform many disability-related functions, including but not limited to, guiding individuals who are blind or have low vision, alerting individuals who are deaf or hard of hearing to sounds, providing protection or rescue assistance, pulling a wheelchair, fetching items, alerting persons to impending seizures, or providing emotional support to persons with disabilities who have a disability-related need for such support. For purposes of reasonable accommodation requests, neither the FHAct nor Section 504 requires an assistance animal to be individually trained or certified.<sup>5</sup> While dogs are the most common type of assistance animal, other animals can also be assistance animals.

Housing providers are to evaluate a request for a reasonable accommodation to possess an assistance animal in a dwelling using the general principles applicable to all reasonable accommodation requests. After receiving such a request, the housing provider must consider the following:

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<sup>3</sup> Reasonable accommodations under the FHAct and Section 504 apply to tenants and applicants with disabilities, family members with disabilities, and other persons with disabilities associated with tenants and applicants. 24 CFR §§ 100.202; 100.204; 24 C.F.R. §§ 8.11, 8.20, 8.21, 8.24, 8.33, and case law interpreting Section 504.

<sup>4</sup> Assistance animals are sometimes referred to as "service animals," "assistive animals," "support animals," or "therapy animals." To avoid confusion with the revised ADA "service animal" definition discussed in Section II of this notice, or any other standard, we use the term "assistance animal" to ensure that housing providers have a clear understanding of their obligations under the FHAct and Section 504.

<sup>5</sup> For a more detailed discussion on assistance animals and the issue of training, see the preamble to HUD's final rule, Pet Ownership for the Elderly and Persons With Disabilities, 73 Fed. Reg. 63834, 63835 (October 27, 2008).



- (1) Does the person seeking to use and live with the animal have a disability – *i.e.*, a physical or mental impairment that substantially limits one or more major life activities?
- (2) Does the person making the request have a disability-related need for an assistance animal? In other words, does the animal work, provide assistance, perform tasks or services for the benefit of a person with a disability, or provide emotional support that alleviates one or more of the identified symptoms or effects of a person's existing disability?

If the answer to question (1) **or** (2) is “no,” then the FHAct and Section 504 do not require a modification to a provider's “no pets” policy, and the reasonable accommodation request may be denied.

Where the answers to questions (1) **and** (2) are “yes,” the FHAct and Section 504 require the housing provider to modify or provide an exception to a “no pets” rule or policy to permit a person with a disability to live with and use an assistance animal(s) in all areas of the premises where persons are normally allowed to go, unless doing so would impose an undue financial and administrative burden or would fundamentally alter the nature of the housing provider's services. The request may also be denied if: (1) the specific assistance animal in question poses a direct threat to the health or safety of others that cannot be reduced or eliminated by another reasonable accommodation, or (2) the specific assistance animal in question would cause substantial physical damage to the property of others that cannot be reduced or eliminated by another reasonable accommodation. Breed, size, and weight limitations may not be applied to an assistance animal. A determination that an assistance animal poses a direct threat of harm to others or would cause substantial physical damage to the property of others must be based on an individualized assessment that relies on objective evidence about the specific animal's actual conduct – not on mere speculation or fear about the types of harm or damage an animal may cause and not on evidence about harm or damage that other animals have caused. Conditions and restrictions that housing providers apply to pets may not be applied to assistance animals. For example, while housing providers may require applicants or residents to pay a pet deposit, they may not require applicants and residents to pay a deposit for an assistance animal.<sup>6</sup>

A housing provider may not deny a reasonable accommodation request because he or she is uncertain whether or not the person seeking the accommodation has a disability or a disability-related need for an assistance animal. Housing providers may ask individuals who have disabilities that are not readily apparent or known to the provider to submit reliable documentation of a disability and their disability-related need for an assistance animal. If the disability is readily apparent or known but the disability-related need for the assistance animal is not, the housing provider may ask the individual to provide documentation of the disability-related need for an assistance animal. For example, the housing provider may ask persons who are seeking a reasonable accommodation for an assistance animal that provides emotional

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<sup>6</sup> A housing provider may require a tenant to cover the costs of repairs for damage the animal causes to the tenant's dwelling unit or the common areas, reasonable wear and tear excepted, if it is the provider's practice to assess tenants for any damage they cause to the premises. For more information on reasonable accommodations, see the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, *Reasonable Accommodations Under the Fair Housing Act*, <http://www.hud.gov/offices/fheo/library/huddojstatement.pdf>.



support to provide documentation from a physician, psychiatrist, social worker, or other mental health professional that the animal provides emotional support that alleviates one or more of the identified symptoms or effects of an existing disability. Such documentation is sufficient if it establishes that an individual has a disability and that the animal in question will provide some type of disability-related assistance or emotional support.

However, a housing provider may not ask a tenant or applicant to provide documentation showing the disability or disability-related need for an assistance animal if the disability or disability-related need is readily apparent or already known to the provider. For example, persons who are blind or have low vision may not be asked to provide documentation of their disability or their disability-related need for a guide dog. A housing provider also may not ask an applicant or tenant to provide access to medical records or medical providers or provide detailed or extensive information or documentation of a person's physical or mental impairments. Like all reasonable accommodation requests, the determination of whether a person has a disability-related need for an assistance animal involves an individualized assessment. A request for a reasonable accommodation may not be unreasonably denied, or conditioned on payment of a fee or deposit or other terms and conditions applied to applicants or residents with pets, and a response may not be unreasonably delayed. Persons with disabilities who believe a request for a reasonable accommodation has been improperly denied may file a complaint with HUD.<sup>7</sup>

## **Section II: The ADA Definition of "Service Animal"**

In addition to their reasonable accommodation obligations under the FHAct and Section 504, housing providers may also have separate obligations under the ADA. DOJ's revised ADA regulations define "service animal" narrowly as any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. The revised regulations specify that "the provision of emotional support, well-being, comfort, or companionship do not constitute work or tasks for the purposes of this definition."<sup>8</sup> Thus, trained dogs are the only species of animal that may qualify as service animals under the ADA (there is a separate provision regarding trained miniature horses<sup>9</sup>), and emotional support animals are expressly precluded from qualifying as service animals under the ADA.

The ADA definition of "service animal" applies to state and local government programs, services activities, and facilities and to public accommodations, such as leasing offices, social service center establishments, universities, and other places of education. Because the ADA requirements relating to service animals are different from the requirements relating to assistance animals under the FHAct and Section 504, an individual's use of a service animal in an ADA-covered facility must not be handled as a request for a reasonable accommodation under the FHAct or Section 504. Rather, in ADA-covered facilities, an animal need only meet the definition of "service animal" to be allowed into a covered facility.

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<sup>7</sup> Ibid.

<sup>8</sup> 28 C.F.R. § 35.104; 28 C.F.R. § 36.104.

<sup>9</sup> 28 C.F.R. § 35.136(i); 28 C.F.R. § 36.302(c)(9).



To determine if an animal is a service animal, a covered entity shall not ask about the nature or extent of a person's disability, but may make two inquiries to determine whether an animal qualifies as a service animal. A covered entity may ask: (1) Is this a service animal that is required because of a disability? and (2) What work or tasks has the animal been trained to perform? A covered entity shall not require documentation, such as proof that the animal has been certified, trained, or licensed as a service animal. These are the only two inquiries that an ADA-covered facility may make even when an individual's disability and the work or tasks performed by the service animal are not readily apparent (*e.g.*, individual with a seizure disability using a seizure alert service animal, individual with a psychiatric disability using psychiatric service animal, individual with an autism-related disability using an autism service animal).

A covered entity may not make the two permissible inquiries set out above when it is readily apparent that the animal is trained to do work or perform tasks for an individual with a disability (*e.g.*, the dog is observed guiding an individual who is blind or has low vision, pulling a person's wheelchair, or providing assistance with stability or balance to an individual with an observable mobility disability). The animal may not be denied access to the ADA-covered facility unless: (1) the animal is out of control and its handler does not take effective action to control it; (2) the animal is not housebroken (*i.e.*, trained so that, absent illness or accident, the animal controls its waste elimination); or (3) the animal poses a direct threat to the health or safety of others that cannot be eliminated or reduced to an acceptable level by a reasonable modification to other policies, practices and procedures.<sup>10</sup> A determination that a service animal poses a direct threat must be based on an individualized assessment of the specific service animal's actual conduct – not on fears, stereotypes, or generalizations. The service animal must be permitted to accompany the individual with a disability to all areas of the facility where members of the public are normally allowed to go.<sup>11</sup>

### **Section III. Applying Multiple Laws**

Certain entities will be subject to both the service animal requirements of the ADA and the reasonable accommodation provisions of the FHAct and/or Section 504. These entities include, but are not limited to, public housing agencies and some places of public accommodation, such as rental offices, shelters, residential homes, some types of multifamily housing, assisted living facilities, and housing at places of education. Covered entities must ensure compliance with all relevant civil rights laws. As noted above, compliance with the FHAct and Section 504 does not ensure compliance with the ADA. Similarly, compliance with the ADA's regulations does not ensure compliance with the FHAct or Section 504. The preambles to DOJ's 2010 Title II and Title III ADA regulations state that public entities or public accommodations that operate housing facilities "may not use the ADA definition [of "service animal"] as a justification for reducing their FHAct obligations."<sup>12</sup>

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<sup>10</sup> 28 C.F.R. § 35.136; 28 C.F.R. § 36.302(c).

<sup>11</sup> For more information on ADA requirements relating to service animals, visit DOJ's website at [www.ada.gov](http://www.ada.gov).

<sup>12</sup> 75 Fed. Reg. at 56166, 56240 (Sept. 15, 2010).

The revised ADA regulations also do not change the reasonable accommodation analysis under the FHAct or Section 504. The preambles to the 2010 ADA regulations specifically note that under the FHAct, “an individual with a disability may have the right to have an animal other than a dog in his or her home if the animal qualifies as a ‘reasonable accommodation’ that is necessary to afford the individual equal opportunity to use and enjoy a dwelling, assuming that the use of the animal does not pose a direct threat.”<sup>13</sup> In addition, the preambles state that emotional support animals that do not qualify as service animals under the ADA may “nevertheless qualify as permitted reasonable accommodations for persons with disabilities under the FHAct.”<sup>14</sup> While the preambles expressly mention only the FHAct, the same analysis applies to Section 504.

In cases where all three statutes apply, to avoid possible ADA violations the housing provider should apply the ADA service animal test first. This is because the covered entity may ask only whether the animal is a service animal that is required because of a disability, and if so, what work or tasks the animal has been trained to perform. If the animal meets the test for “service animal,” the animal must be permitted to accompany the individual with a disability to all areas of the facility where persons are normally allowed to go, unless (1) the animal is out of control and its handler does not take effective action to control it; (2) the animal is not housebroken (i.e., trained so that, absent illness or accident, the animal controls its waste elimination); or (3) the animal poses a direct threat to the health or safety of others that cannot be eliminated or reduced to an acceptable level by a reasonable modification to other policies, practices and procedures.<sup>15</sup>

If the animal does not meet the ADA service animal test, then the housing provider must evaluate the request in accordance with the guidance provided in Section I of this notice.

It is the housing provider’s responsibility to know the applicable laws and comply with each of them.

#### **Section IV. Conclusion**

The definition of “service animal” contained in ADA regulations does not limit housing providers’ obligations to grant reasonable accommodation requests for assistance animals in housing under either the FHAct or Section 504. Under these laws, rules, policies, or practices must be modified to permit the use of an assistance animal as a reasonable accommodation in housing when its use may be necessary to afford a person with a disability an equal opportunity to use and enjoy a dwelling and/or the common areas of a dwelling, or may be necessary to allow a qualified individual with a disability to participate in, or benefit from, any housing program or activity receiving financial assistance from HUD.

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<sup>13</sup> 75 Fed. Reg. at 56194, 56268.

<sup>14</sup> 75 Fed. Reg. at 56166, 56240.

<sup>15</sup> 28 C.F.R. § 35.136; 28 C.F.R. § 36.302(c).



Questions regarding this notice may be directed to the HUD Office of Fair Housing and Equal Opportunity, Office of the Deputy Assistant Secretary for Enforcement and Programs, telephone 202-619-8046.



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John Trasviña, Assistant Secretary for  
Fair Housing and Equal Opportunity



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-2000

June 12, 2006

OFFICE OF FAIR HOUSING  
AND EQUAL OPPORTUNITY

MEMORANDUM FOR: FHEO Regional Directors  
FROM:   
Bryan Greene, Deputy Assistant Secretary for Enforcement and  
Programs, ED  
SUBJECT: Insurance Policy Restrictions as a Defense for Refusals to Make a  
Reasonable Accommodation

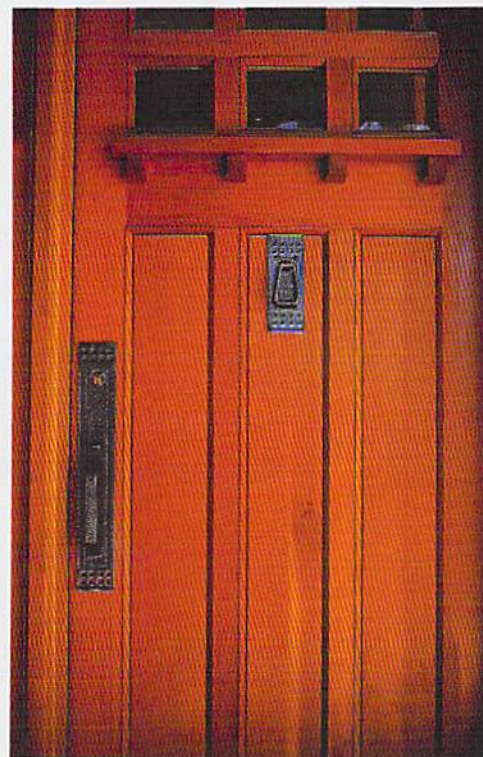
This memorandum responds to requests for guidance on how HUD investigators should examine Fair Housing Act "reasonable accommodation" cases where a housing provider cites an insurance policy restriction in denying a request from a person with a disability to reside in a dwelling with an assistance animal that is of a breed of dog that the landlord's insurance carrier considers dangerous. In the referenced cases, the housing providers stated that their insurance carriers will either refuse to cover their properties, substantially increase the cost of coverage, or adversely change the terms of their policies if these animals are allowed to occupy dwellings.

As with any request for a reasonable accommodation, the request should be evaluated on a case-by-case basis. HUD provides the following guidance to assist in that evaluation.

According to the *Joint Statement on Reasonable Accommodations*, an accommodation is unreasonable if it imposes an undue financial and administrative burden on a housing provider's operations. If a housing provider's insurance carrier would cancel, substantially increase the costs of the insurance policy, or adversely change the policy terms because of the presence of a certain breed of dog or a certain animal, HUD will find that this imposes an undue financial and administrative burden on the housing provider. However, the investigator must substantiate the housing provider's claim regarding the potential loss of or adverse change to the insurance coverage, by verifying such a claim with the insurance company directly and considering whether comparable insurance, without the restriction, is available in the market. If the investigator finds evidence that an insurance provider has a policy of refusing to insure any housing that has animals, without exception for assistance animals, it may refer that information to the Department of Justice for investigation to determine whether the insurance provider has violated federal civil rights laws prohibiting discrimination based upon disability.



# HELP OPEN DOORS...



## ...FOR PEOPLE WITH DISABILITIES

Guidance for Health Care and Social Service Providers Assisting  
with Reasonable Accommodation and Modification Requests  
Under the Federal Fair Housing Act.

*Silver State*  
  
*Fair Housing Council*



Fair Housing Laws are intended to ensure equity in access to housing opportunities. This publication is intended to provide basic fair housing information and guidance for professionals and other qualified third parties assisting people with disabilities who are requesting reasonable accommodations and modifications under the provisions of the federal Fair Housing Act.

The federal Fair Housing Act (FHA), as amended in 1998, prohibits discrimination in the provision of housing and housing-related services based on race, color, religion, sex, national origin, family status (the presence of children under the age of 18 in the household), and/or disability. Nevada State Law includes additional protections prohibiting discrimination because of ancestry, sexual orientation and/or gender identity or expression. The FHA provides that people with disabilities may request reasonable modifications or accommodations, related to their disability, that will allow them to have full use and enjoyment of a dwelling or a common area. The Act defines a person with a disability to include (1) individuals with a physical or mental impairment that substantially limits one or more major life activities; (2) individuals who are regarded as having such impairment; and (3) individuals with a record of such impairment.

**Reasonable Modifications** are structural changes to existing premises, occupied or to be occupied by a person with a disability. Reasonable modifications can include structural changes to interiors or exteriors of dwellings and to common and public use areas. The FHA provides that while the housing provider must permit the modification, the resident is responsible for paying the cost of the modification. The housing provider may require that work be performed in a *workmanlike manner* and that necessary building permits be obtained. Examples of *reasonable modifications* include installing a ramp into the house/apartment, installing grab bars in bathrooms, widening doorways, removing base cabinets, or replacing the existing carpet.



**Reasonable Accommodations** are changes, exceptions, or adjustments to a rule, policy, practice or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy their dwelling, including public and common use areas. Examples of *reasonable accommodations* include waiving pet fees/deposits for service or emotional support animals, assigning a reserved parking space, allowing a transfer to a ground floor unit, or early release from a housing contract. **Note:** Under the Fair Housing Act, persons with disabilities may request a reasonable accommodation for *any* assistance animal, including an emotional support animal.



Housing providers, including landlords, homeowner associations, public housing authorities, and others dealing in housing transactions can ask that the resident or applicant provide verification that a requested accommodation/modification is necessary if the need for the accommodation is not obvious. There must be an identifiable relationship, or nexus, between the requested accommodation and the individual's disability. The verification can be provided by a doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability. In most cases, an individual's medical records or detailed information about the nature of a person's disability is *not* necessary for this inquiry.

Because you may be asked to assist persons with disabilities in verifying the need for a request, Silver State Fair Housing Council (SSFHC) is providing a sample letter that you may use to verify that (1) the person meets the definition of disability under the Fair Housing Act, (2) the need for the accommodation or modification is necessary, and (3) there is a relationship between the disability and the requested accommodation or modification.

*Place Verification on Your Organizational Letterhead*

DATE

HOUSING PROVIDER

TITLE/PROPERTY NAME/COMPANY NAME

ADDRESS

CITY, STATE, ZIP

Dear (*Insert Housing Provider Name*):

*The Fair Housing Act (FHA) defines a disability as a physical or mental impairment that substantially limits one or more major life activities. Examples of disabilities include, but are not limited to: orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, Human Immunodeficiency Virus infection, mental retardation, emotional illness, drug addiction (other than addiction caused by current, illegal use of a controlled substance), and alcoholism.*

**Basic Sample Language of the Letter:**

(*Name of community member/client/patient*) has contacted me regarding *his/her* need for a reasonable accommodation/modification. (*Name*) has informed me that *s/he* has requested (*describe request*). In my professional capacity, I verify that (*Name*) meets the definition of disability under the federal Fair Housing Act and that the requested accommodation/modification is disability-related and necessary to afford (*Name*) the full use and enjoyment of *his/her* housing and/or the housing service(s) for which *s/he* is applying.

**Sample Language for a Service Animal:**

(*Name of community member/client/patient*) has contacted me regarding *his/her* need for a reasonable accommodation. (*Name*) has informed me that *s/he* has requested a waiver of the no pets policy and any related pet fees or policies to accommodate *her/his* need for a service animal to assist with the outcomes of *his/her* disability. In my professional capacity, I verify that (*Name*) meets the definition of disability under the federal Fair Housing Act and that the requested accommodation is disability-related and necessary to afford *her/him* full use and enjoyment of *his/her* housing and/or housing related service.

**Sample Language for a Reserved Parking Space:**

(*Name of community member/client/patient*) has contacted me regarding *his/her* need for a reasonable accommodation. (*Name*) has informed me that *s/he* has requested a reserved parking space and a waiver of the monthly reserved parking fees because of the physical limitations related to *his/her* disability. In my professional capacity, I verify that (*Name*) meets the definition of disability under the federal Fair Housing Act and that the requested accommodation is disability-related and necessary to afford *her/him* full use and enjoyment of *his/her* housing and/or housing related service.

**Sample Language for Installation of Grab Bars:**

(*Name of community member/client/patient*) has contacted me regarding *his/her* need for a reasonable modification. (*Name*) has informed me that *s/he* has requested permission to have grab bars installed in the bathroom, at *his/her* expense, due to the outcomes of *his/her* disability. In my professional capacity, I verify that (*Name*) meets the definition of disability under the federal Fair Housing Act and that the requested modification is disability-related and necessary to afford *her/him* full use and enjoyment of their housing and/or housing related service.

Sincerely,

SIGNATURE OF PROFESSIONAL

PRINTED NAME

TITLE/POSITION

ORGANIZATION, IF NOT ON LETTERHEAD

CONTACT INFORMATION, IF NOT ON LETTERHEAD



## RESOURCES

Visit our website at <http://www.ssfhc.org/Resources/> for copies of these and other documents.

*Joint statement of the Department of Housing and Urban Development and the Department of Justice - Reasonable Accommodations Under the Fair Housing Act (May 17, 2004)*  
Definitions and examples of Reasonable Accommodations

*Joint statement of the Department of Housing and Urban Development and the Department of Justice - Reasonable Modifications Under the Fair Housing Act (March 5, 2008)*  
Definitions and examples of Reasonable Modifications

*New ADA Regulations and Assistance Animals as Reasonable Accommodations under the Fair Housing Act and Section 504 of the Rehabilitation Act of 1973 - Sara K. Pratt, Deputy Assistant Secretary for Enforcement and Programs (February 17, 2011)*  
Clarification on service animals under FHA, ADA, and Section 504

*Service Animals and Assistance Animals for People with Disabilities in Housing and HUD-Funded Programs*  
John Trasviña, Assistant Secretary for Fair Housing and Equal Opportunity (April 30, 2013)  
Guidance clarifying the definition of service animals under the FHA, ADA and Section 504

Reasonable accommodations and modifications allow people with disabilities to have equitable access to housing. Silver State Fair Housing Council works closely with community members in making these requests, many of which may depend on the need for verification. Thank you for your interest in supporting these bona-fide requests. Please feel free to contact our office for additional information. Working together, we can ensure equal access to housing for all!

### NORTHERN NEVADA

110 WEST ARROYO STREET, SUITE A  
RENO, NV 89509  
P.O. Box 3935, Reno, NV 89505  
775-324-0990 ☐ 775-324-7507 (fax)

### SOUTHERN NEVADA

2820 SOUTH JONES BLVD, UNIT 4  
LAS VEGAS, NV 89146  
P.O. Box 30936, Las Vegas, NV 89173  
702-749-3288 ☐ 702-749-3299 (fax)

1-888-585-8634 toll free ☐ Relay Nevada 711  
FairHousing@ssfhc.org ☐ [www.ssfhc.org](http://www.ssfhc.org)

*SSFHC's offices and training facilities are wheelchair accessible. SSFHC is pleased to make reasonable accommodations for people with disabilities upon request.*



**Silver State Fair Housing Council (SSFHC)** is a non-profit agency advocating for equal access to housing in Nevada since 1989. SSFHC has office locations in Reno and Las Vegas to address inquiries about housing discrimination from consumers, housing providers, and local jurisdictions. SSFHC also provides services in rural communities through personal interactions, meeting utilizing remote technologies, and community partnerships. SSFHC strives to break down barriers to equal housing opportunity and build opportunities for community members to relate to each other as neighbors by addressing the needs of all members of the community. SSFHC provides education and outreach about fair housing rights; processes discrimination complaints, investigations, and referrals; and assesses barriers to fair housing in Nevada. SSFHC works to guarantee the right of all people to freely choose where they want and can afford to live.

*The work that provided the basis for this brochure is supported by funding under a grant from the U.S. Department of Housing and Urban Development. The substance and findings of the work are dedicated to the public. The authors and presenters are solely responsible for the accuracy of the statements and interpretations contained in this brochure. Such interpretations do not necessarily reflect the views of the Federal Government.*