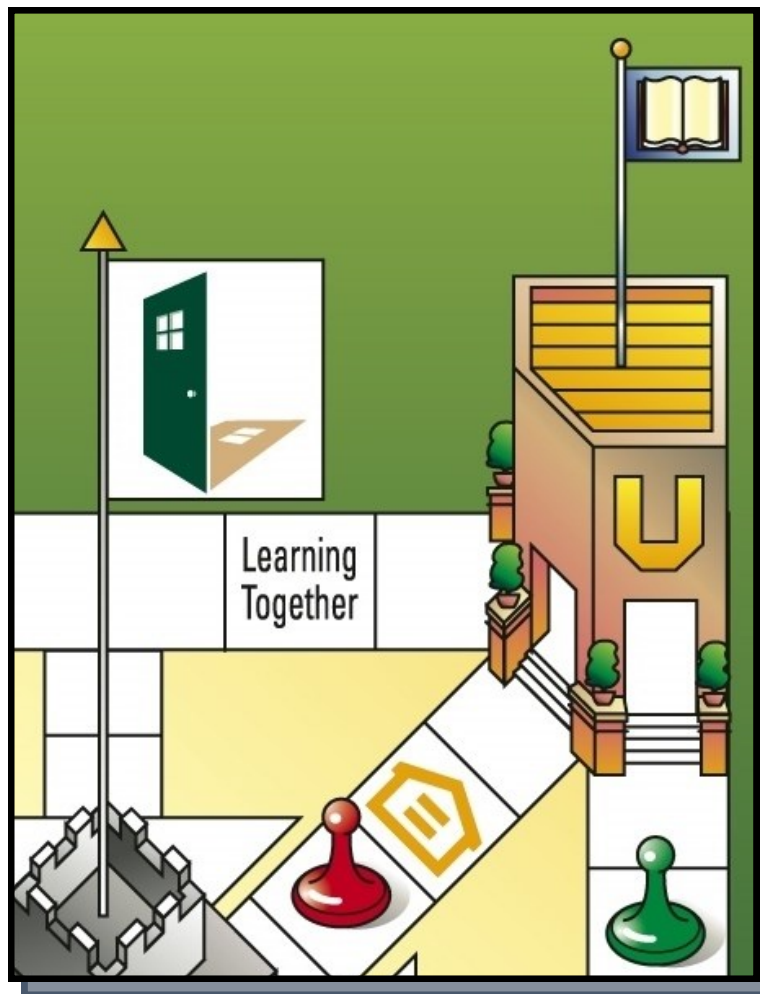


# A STUDENT HOUSING PROFESSIONAL'S GUIDE TO REASONABLE ACCOMMODATIONS UNDER THE FAIR HOUSING ACT



*A guidebook to assist in addressing fair housing responsibilities  
for colleges and universities who offer and manage  
on-campus or off-site student housing*

Produced 2017 by the Fair Housing Center of West Michigan



## **What is a reasonable accommodation or reasonable modification?**

Under the Fair Housing Act, a **reasonable accommodation** is a change or exception to any rule, policy, procedure or service needed in order for a person with a disability to be able to have equal access to and full enjoyment of their home. Examples of reasonable accommodations include allowing an assistance animal where there is a “no pet” policy or allowing a room change to a single room for medical equipment. Reasonable accommodations enable independent living and equal access to housing for students with disabilities.

It is important to note that a reasonable accommodation can be made during any part of a student housing transaction. If a current student resident or prospective student applicant at your college or university makes a request, you are required to promptly respond and process the request. These requests should be evaluated on a case-by-case basis in a timely manner.

*\*Students with disabilities may also request a **reasonable modification**, which is a structural change made to existing premises that is occupied or to be occupied by a student with a disability in order to afford them full enjoyment of the premises. Examples of reasonable modifications include the installation of a ramp, grab bar, or handrail. Please contact the FHCWM for guidance regarding modifications.*

## **What is fair housing?**

Federal and Michigan fair housing laws protect people from illegal discrimination in housing based on race, color, religion, national origin, sex, familial status, **disability**, marital status, and age. Illegal housing discrimination includes a refusal to make a reasonable accommodation or a refusal to permit a reasonable modification if such would be necessary to afford a student with a disability equal use and full enjoyment of the housing and associated campus facilities.



## **What responsibilities do colleges and universities have under fair housing laws?**

Colleges and universities that offer student housing must comply with the Fair Housing Act, the Michigan Elliott-Larsen Civil Rights Act and any applicable fair housing ordinances at the local level. Further, public and private colleges and universities supported by federal grants and funding programs must comply with Section 504 of the Rehabilitation Act of 1973. Common areas in student housing may further be covered by the Americans with Disabilities Act (ADA). It’s a good idea to know what laws apply to your college or university in order to refer to the proper guidance and ensure compliance.

Further, when it comes to reasonable accommodations for assistance animals, HUD specifically states that 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.” (See HUD’s FHEO Notice: Service Animals and Assistance Animals for People with Disabilities in Housing and HUD-Funded Programs)

Any student in the process of seeking housing, whether on or off campus, is protected by fair housing laws and has the right to inquire about, apply for, and obtain housing free from discrimination because of their race, age, disability, etc. Fair housing laws cover most types of housing, including but not limited to: residence halls, apartment complexes, single-family homes, condominiums, manufactured homes and more. Students with disabilities also have the right to request reasonable accommodations in order to provide equal access and enjoyment to housing opportunity.

*It is important to note that in university-sponsored housing certain exemptions may allow for limitations on the basis of marital status (i.e. “married housing”). This guidebook will specifically address fair housing responsibilities for student housing providers regarding on campus living or in housing offered by a college or university.*

## **Fair Housing for Students with Disabilities**

The Fair Housing 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 an impairment; and (3) individuals with a record of such an impairment.

- **Walking**
- **Breathing**
- **Communicating**
- **Seeing**
- **Hearing**
- **Caring for oneself**
- **Thinking**
- **Learning**
- **And beyond...**

Major life activities include:

**Disabilities include, but are not limited to:** Mental/emotional disabilities, developmental disabilities, cancer, auto-immune deficiencies such as HIV, autism, cerebral palsy, multiple sclerosis, heart disease, diabetes, asthma, paraplegia, major depression, recovery from an addiction, and many long-term medical conditions.

## **Who can make a request for a reasonable accommodation or modification?**

Students with disabilities who reside on campus or in housing run by the college or university may make reasonable accommodation requests; applicants may also make such a request. Caregivers, relatives, or an advocacy organization may also make a request on behalf of a student with a disability for a reasonable accommodation. There is no limit on the number of requests a prospective or current student can make as sometimes multiple changes are necessary for equal access and enjoyment of the student housing and campus. Such requests may also be made at any time.

## **What do I do if a request is made?**

Listen and take notes! A reasonable accommodation request should trigger an “interactive process”, which is a call for meaningful dialogue and action. A student housing administrator or provider may not ordinarily inquire as to the nature and severity of a student’s disability unless the student is requesting an accommodation in their housing. Once a request for a reasonable accommodation is made, it is a good idea to meet with or contact the student who has made the request (whether the request was made independently or through an advocacy group) to discuss the request further and the disability-related need(s). This may also represent an opportunity to offer additional, optional information about similar/other college or university services that may benefit the student, such as disability support services.

**TIP:** It’s a good idea to ask open-ended questions, let the student inform you of their needs, and document everything – dates, research, steps taken, etc.

## **How should a reasonable accommodation request be made?**

A request can be made verbally or in writing by the student to any representative of the student housing/administration at any time (i.e. before they move in, while they move in, or after living there for several semesters/years). It is usually helpful for both the student and the student housing administrators if the request is made in writing. You can have a form for such a request, however, you cannot require use of that form. Documenting the request, regardless of how it is made, will help prevent misunderstandings regarding what is being requested, or whether the request was ever made. A student requesting a reasonable accommodation does not need to mention the Fair Housing Act or use the words “reasonable accommodation”. You must give appropriate consideration to all requests, even if the request is made verbally or does not use your preferred forms or procedures.

### **Examples of Reasonable Accommodation Requests:**

- Assigning an accessible parking space near a residence hall entrance or room
- Waiving a “no pet” or pet fee policy to allow for an assistance animal
- Allowing a move to the ground floor due to limits or changes in their ability to use stairs

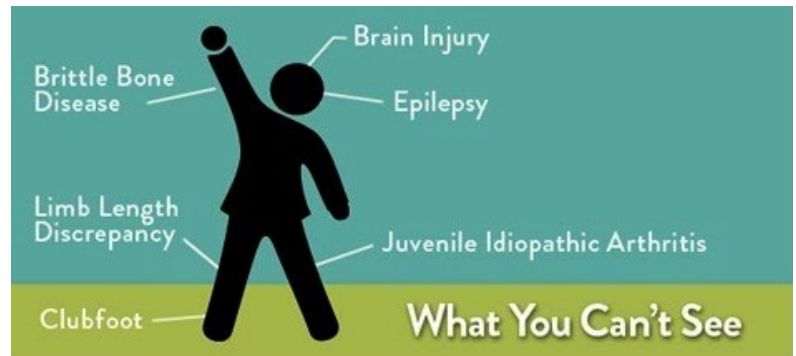
## How do I process a request?

You need to first determine what type of information, if any, you need from the student with a disability regarding their request. The amount of information that you can request depends on whether or not the individual's disability is obvious or known, and whether or not the disability-related need is readily apparent or known to you.

If the disability **is** readily apparent or otherwise known to you, you do not need any additional documentation to process the request. **For example**, a student with Low Vision who uses a probing cane may ask for documents to be



provided to them in large print, electronically or in a certain format compatible with an electronic reader. Since the physical disability (difficulty seeing) and the disability-related need (use of large print) for the requested accommodation are readily apparent, you may not request or require any additional information about the disability or the disability-related need.



If the disability is **not** obvious or otherwise known to you, you may request verification of the disability and information establishing a disability-related need for the request. **For example**, a student may ask to live with an assistance animal that provides emotional support in order to cope with stress and anxiety related to her disability. Typically, you would not be able to observe why the animal is necessary. Remember, many types of disabilities – physical and mental – are not apparent to an outside observer. The student or their advocate can obtain supporting documentation from a doctor or other qualified medical professional, a peer support group, a non-medical service agency, a social worker, or a reliable third party who is in a position to know about the student's disability.



The supporting document only needs to verify that the student:

- (1) **has a disability as defined by the Fair Housing Act (see page 2) AND**
- (2) **has a disability-related need for the requested accommodation.**

You may want to provide the student with the FHCWM's Fact Sheet on Writing Support Letters (see Appendix p. 8-9) which can be shared with their doctor or other qualified medical or therapeutic professional to help them understand what you are requesting and what type of documentation should be provided. Please note that the FHCWM also offers a guidebook like this one for the use of students (visit [fhcwm.org/publications](http://fhcwm.org/publications)). Working from the same information can help both the student housing administrator and student work together effectively and efficiently.

As the student housing provider you do not need to know the details of the student's disability, diagnosis, or health history; *only* that a disability is present and that the request is needed because of the disability. You may be part of a college or university department that already has some knowledge of the student's disability or history if for example, the student has also requested accommodations in the classroom (such as changes in how tests are administered, more time in the classroom, etc.). If this is the case, it's important to assess whether you need any *further* documentation.

**NOTE:** The amount of information that you can request depends on whether the student's disability is obvious or known to you and whether the disability-related need is readily apparent or known.

## Supporting Documentation

Please note that there are many types of documentation that may substantiate that the student has a disability and a disability-related need. In the case of assistance animals that provide emotional support, there are a growing number of sources offering different types of documentation, especially online. Some of these sources provide documentation that does not meet the standards outlined previously and it would be appropriate to ask for more documentation from the student. Some of these sources do provide adequate information, and in some circumstances, may be the only source for a student with a disability to successfully secure documentation. For example, students relocating to a new area may not have a local health care provider or may not have been able to be seen yet; others may be from rural areas with limited health care options or be a current patient of a medical professional who won't provide documentation unless the student comes in person. This is why evaluating these requests on a case-by-case basis is an important best practice.

According to the aforementioned HUD FHEO Notice on assistance animals, 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."

**NOTE:** The approval or denial of requests depends on the circumstances presented and needs to be determined on a case-by-case basis.

It would be beneficial to designate one college or university representative to handle and manage such requests, but be sure that there is someone else who is able to address questions, handle the request process, and provide related updates if the designated person is out. Your role as the student housing provider is to collect as much information as is necessary to understand the request being made and to follow up quickly and consistently. It is best to document every step of the process: the request, your response, and all communication related to the decisions and actions taken (see Sample Response Form Appendix p. 11). *It's also important to keep all information confidential.*

## What if there are costs involved?

A reasonable accommodation is processed and completed with no cost to the student with a disability. If the cost of the accommodation is found to be an undue financial and administrative burden, then you *must* discuss possible alternative accommodation methods with the student or the advocate making the request. Your role in processing the request is to maintain communication and to exhaust all possible alternatives before denying the request. The last resort alternative to an accommodation request may be a discussion about releasing the student from their housing contract without penalty because the housing no longer meets their needs. Ideally, requests for reasonable accommodations are part of an *interactive process* between both parties.

## When can a request be denied?

A request for an accommodation can be denied for the following reasons:

- (1) **a request for a reasonable accommodation or reasonable modification was not made by or on behalf of a student with a disability, or if there is no disability-related need for the request, and/or**
- (2) **if it would impose an undue financial and administrative burden on the student housing provider or would fundamentally alter the nature of the provider's operations.**

In a reasonable accommodation request for an assistance animal, you may deny the request 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. Determination that any 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.

These determinations should be made on a case-by-case basis involving factors such as the cost of the request, financial resources, the benefit to the student, and availability of alternative accommodations that would equally meet the student's needs. If, for one or more of the reasons listed previously, you denied the request, alternative methods to accommodate the student's needs or modify their housing *must* be discussed. It is important that you communicate the different options available with the student so that they are able to enjoy equal access to and full enjoyment of their room or residence hall as well as the campus/property.

**NOTE:** A student is not obligated to accept an alternative accommodation suggested by the student housing provider if they believe it will not meet their needs and their preferred request is reasonable.

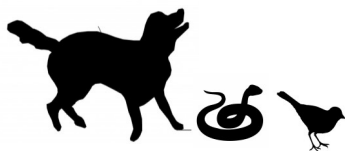
### **What is an Assistance Animal?**

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 *do not need to be trained, certified or licensed* by any entity or program. The Fair Housing Act does not limit the type of animal or the number of animals that a person with a disability may request as a reasonable accommodation. If a student is seeking permission to use/live with multiple assistance animals, they can be asked to provide third-party verification/documentation that each assistance animal will individually ameliorate different disability-related symptoms (for example, a student with a seizure disorder may need an assistance animal to alert them of an impending seizure as well as an assistance animal that provide emotional support regarding their anxiety related to their disabilities).

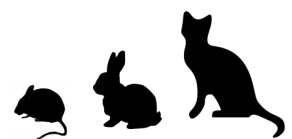
**NOTE:** There should be no additional charges or fees applied to assistance animals.

Assistance animals perform many disability-related functions, including but not limited to, guiding students who are blind or have Low Vision, alerting students who are deaf or hard of hearing to sounds, providing protection or rescue assistance, pulling a wheelchair, fetching items, alerting students to impending seizures, or providing emotional support to students with disabilities who have a disability-related need for such support. Assistance animals can significantly enhance a student's ability to live independently.

Assistance animals are not subject to additional charges such as fees or deposits nor any other existing pet-related policies. *Breed, size, and weight limitations may not be applied to assistance animals.* Assistance animals, once approved, should be allowed in all areas of the housing premises where students are normally allowed to go unless there is an undue financial and administrative burden or fundamental alteration of the student housing provider's services. Assistance animals must be under control at all times.



**NOTE:** Fair Housing laws allow any kind of animal to be an assistance animal as long as it serves a disability-related need.



You are not able to deny an assistance animal under the premise that your college or university's insurance has a policy stating restrictions or prohibitions against certain breeds, sizes, or number of animals. If the 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 animal or a certain animal this may impose an undue financial and administrative burden. You as a student housing provider will need to verify such a claim with the insurance company directly and consider whether comparable insurance, without the restriction, is available on the market. If you find that an insurance policy discriminates against students with disabilities, please contact the Fair Housing Center of West Michigan.

## **What about roommates and shared living?**

Student housing administrators should work with students utilizing approved assistance animals on a plan to appropriately notify roommates or other affected students about the accommodation. Students with assistance animals who share living space with other students should work with college/university staff and their roommates to ensure successful shared living. Students with assistance animals must ensure compliance with any existing student rules such as Code of Conduct, housing contract, and any assistance animal policy. Please see Appendix p. 10 for an example policy that addresses common concerns about care and control of the assistance animal. All parties should be aware that some students have medical conditions that are affected by the presence of animals (e.g., respiratory diseases, asthma, severe allergies) and may not be able to live in shared spaces with assistance animals. Therefore, student housing administrators will need to consider the conflicting needs and/or accommodations of all persons involved on a case-by-case basis.

**TIP:** Consider using and/or amending roommate/suitemate agreements once a reasonable accommodation for an assistance animal has been granted.

## **What are the student's responsibilities with the assistance animal?**

Assistance animal owners are responsible for the cost, care, and supervision of assistance animals, including:

- compliance with any laws pertaining to animal licensing, leashing, vaccination, and owner identification;
- compliance with any student housing policies regarding quiet hours, upkeep of residence hall and/or shared living spaces
- keeping the animal clean, healthy and under control, as well as taking effective action when it is out of control;
- feeding and exercising (if applicable) the animal; and
- cleaning up after the animal in the residence and any other areas of the property as well as properly disposing of its waste.

Students should also make arrangements in advance regarding care for their assistance animal in case of an emergency when they are not available to do so. They should provide you (and possibly other onsite staff such as a resident managers or living center directors) with an emergency contact person who is familiar with the assistance animal and can care for it safely.

You may want to consider adopting an Assistance Animal Policy (see Appendix p. 10), especially if the student housing or residence hall rules/policies do not have any existing language regarding animals. This can help address common questions and prevent any misunderstandings about having an assistance animal in student housing.

**NOTE:** Students with disabilities can make a request for a reasonable accommodation at any time.

## **Additional Resources**

- ◇ Department of Justice & HUD—Joint Statement on Reasonable Accommodations
- ◇ HUD Fair Housing and Equal Opportunity Notice on Service Animals and Assistance Animals for People with Disabilities in Housing and HUD-Funded Programs
- ◇ HUD Memo on Insurance Policy Restrictions as a Defense for Refusals to Make a Reasonable Accommodation
- ◇ FHCWM's Student Guide to Reasonable Accommodations Under the Fair Housing Act

Please visit [www.fhcwm.org/publications](http://www.fhcwm.org/publications) to download these and other documents

It is very important to take action after receiving a request.  
Here are some commonly asked questions about addressing such requests.

**What do I do if...?**

A student made the request verbally and not in writing.

You need to follow up regardless of how the request is made. If the student needs assistance or alternative methods to communicate their needs to you, you will need to assist them in providing those means, such as large print materials, braille, electronic format, etc.

A student made a reasonable accommodation request to a different department but not to the designated college or university office/staff member.

Anyone who works for the college/university is responsible for ensuring that the request is referred to staff to follow up with the student who made the request. It is important that all staff is trained to report when a request is made (verbal or written).

A request has been made; can I ask for proof of their disability?

If the need or the disability is apparent, not always (see next question). Regardless, you can never ask for details about their diagnosis, health history, prognosis, etc. in a housing-related request.

What kind of information do I need to ask for when getting verification of a disability that is not obvious?

If the need or disability is not apparent, you can ask for reliable documentation that the resident has 1) a disability as defined by the Fair Housing Act AND 2) a disability-related need for the requested accommodation or modification (see P. 2).

The documentation I received wasn't clear (i.e., didn't reference a disability or describe the disability-related need).

You may ask for additional documentation that verifies the presence of a disability and/or explains the specific connection between the disability and the need for the request (see response form P. 11).

Why can't I charge additional fees for assistance animals?

Assistance animals are essential tools for the student with a disability, which allow them to live independently and provide them the full enjoyment of their housing. Assistance animals are not pets. Any existing pet policies and pet fees cannot be applied to assistance animals.

**TIP:** It is best to document the entire process: receipt of the request, all follow-up communication, dates, and all steps taken to address the request. This prevents any miscommunication and allows for questions/requests to be addressed promptly.



**WRITING SUPPORT LETTERS: HOW MEDICAL PROFESSIONALS CAN SUPPORT REASONABLE ACCOMMODATIONS AND MODIFICATIONS IN STUDENT HOUSING**



Fair Housing Center  
of West Michigan

**What is Fair Housing?**

Federal and Michigan fair housing laws protect people from illegal discrimination in housing based on race, color, religion, national origin, sex, familial status, *disability*, marital status, and age.

**Reasonable Accommodations and Modifications**

Under the Fair Housing Act, a reasonable accommodation is a change or exception to any rule, policy, or procedure or service needed in order for a person with a disability to be able to have equal access to and full enjoyment of their home, such as allowing an assistance animal where there is a no pet policy, or allowing a live-in caregiver when a housing policy states “no over-night guests”. A reasonable modification is a physical change to an apartment or house that makes the unit accessible to someone with a disability such as the installation of a ramp, grab bar or handrail. Accommodations and modifications enable independent living and equal access.

**Your Role as a Medical Professional or Therapeutic Provider**

A student with a disability may be asked to provide proof of a disability and/or verification of a disability-related need when asking for a reasonable accommodation or modification from their housing provider/ landlord. Your role as a medical or therapeutic provider is to provide brief documentation that establishes:

- 1) Your client has a disability as defined by the Fair Housing Act (see below) AND**
- 2) Your client’s disability-related need for the requested accommodation or modification.**

Housing providers and landlords do not need to know the details related to the disability, the client’s diagnosis, or their health history; only that a disability is present and that their request is needed because of that disability.

The Fair Housing 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 an impairment; and (3) individuals with a record of such an impairment.

Major life activities include:

Walking	Seeing	Thinking	<b>Disabilities include, but are not limited to:</b> Mental/emotional disabilities, developmental disabilities cancer, auto-immune deficiencies such as HIV, autism, cerebral palsy, multiple sclerosis, heart disease, diabetes, asthma, paraplegia, major depression, recovery from an addiction, and many long-term medical conditions.
Breathing	Hearing	Learning	
Communicating	Caring for oneself	And beyond...	

deficiencies such as HIV, autism, cerebral palsy, multiple sclerosis, heart disease, diabetes, asthma, paraplegia, major depression, recovery from an addiction, and many long-term medical conditions.

**Assistance 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 do not need to be trained, certified or licensed by any entity or program. Any animal prescribed by a doctor or other medical professional to assist a person with a disability can be an assistance animal. 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. Assistance animals can significantly enhance a person’s ability to live independently.

## APPENDIX

### Sample Support Letter

**TIP:** Use office logo or letterhead.

- **Should accomplish the following 2 things:**
  - 1. Verify that the person meets the Fair Housing Act’s definition of disability (need not mention specific diagnosis, but must be clear that the person’s condition rises to the level of a disability)**
  - 2. Show the relationship between the person’s disability and the need for the requested accommodation/modification (words such as “necessary”, “essential”, or “prescribed” should be used to describe the client’s need)**
- **May be written by a doctor or other medical professional, peer support group, non-medical service agency, or reliable third party who is in a position to know about the individual’s disability.**

\*\*\*\*\*

Date

Dear *(Housing Provider)*:

*(Name of client)* is my client/patient, and has been under my care since *(date)*. I am familiar with his/her history and disability-related functional limitations. She/he meets the definition of disability under the fair housing laws. To enhance his/her ability to live independently on campus/in student housing and to have full use and enjoyment of his/her dwelling, I am prescribing/supporting as essential or necessary *(insert need)*

Example 1: a transfer to a first floor unit.

Example 2: an emotional support dog, cat, bird, etc. (be as specific as possible about the kind of animal(s) needed and mention if the patient has the animal(s) already) that will assist *(name of client)* with the functional limitations associated with his/her disability.

Specifically, *(please provide information demonstrating how the accommodation is needed or necessary to alleviate one or more identified symptoms or effects of an existing disability or how the disability will be exacerbated in the absence of the accommodation)*

Example 1: my client has increasing difficulty climbing stairs due to a disability and needs a first floor unit to ensure health and safety AND/OR reduce stress on mobility limitations AND/OR have safer and increased access to laundry facilities AND/OR have safe egress options in event of emergency, etc.

Example 2: the emotional support animal (dog, cat, bird, etc.) is necessary to ease disability-related stress and anxiety OR decrease heart rate OR ameliorate or reduce likelihood of panic episode OR increase capacity for social interaction OR allow for continued health and stability OR increase focus necessary for positive school or work performance OR improve physical, emotional and psychological functioning, etc.

Provided that there are no confidentiality concerns, I am available to answer questions you may have concerning my verification only of *(name of client)*’s request.

Sincerely,

Signature and Name of Professional

*Form developed by the Fair Housing Center of West Michigan • [www.fhcwm.org](http://www.fhcwm.org)*

*Please note this is not intended to be used as legal advice.*

## APPENDIX

### Sample Assistance Animal Policy

[College/University] is committed to making reasonable accommodations to its rules, policies, and practices as required by law to afford students with disabilities an equal opportunity to access housing and any associated amenities, including granting reasonable accommodations for assistance animals as determined on a case-by-case basis. An assistance animal is an animal that either (1) works, provides assistance, or performs tasks for the benefit of a person with a disability; or (2) provides emotional or other type of support that alleviates one or more identified symptoms or effects of a student's disability.

[College/University] is not responsible for the care or supervision of assistance animals.

Assistance animal owners are responsible for the cost, care, and supervision of assistance animals, including:

- compliance with any laws pertaining to animal licensing, leashing, vaccination, and owner identification;
- keeping the animal clean, healthy and under control, as well as taking effective action when it is out of control;
- feeding and exercising (if applicable) the animal; and
- cleaning up after the animal in the residence and any other areas of the property as well as properly disposing of its waste.

Waste disposal via property plumbing is prohibited, but the [College/University] can provide guidance on where/how to appropriately dispose of animal waste.

[College/University] will not require any deposits, surcharges or fees for assistance animals. However, an assistance animal owner may be charged for damage caused by the assistance animal(s) to the same extent that [College/University] would normally charge a person for the damage they cause. The assistance animal owner is responsible for any expenses incurred for cleaning above and beyond a standard cleaning or for repairs to the premises after they vacate.

Owners of assistance animals must comply with the same [College/University housing contract, Code of Conduct or other] rules regarding noise, safety, disruption, and cleanliness as people without disabilities. A reasonable accommodation which may constitute an exception to a policy that otherwise would prohibit having an animal does not constitute an exception to any other policy.

\*\*\*\*\*

Please visit [www.fhcwm.org/publications](http://www.fhcwm.org/publications) to download this document and other helpful documents.

*Developed with guidance from the Fair Housing Center of West Michigan • [www.fhcwm.org](http://www.fhcwm.org)  
Please note this sample policy is not intended to be used as legal advice.*

Consider using this response form to assist you in the process of responding to a request.

Dear (*name of requester*) on (*date*) you requested the following reasonable accommodation for yourself or a person associated with you: \_\_\_\_\_

In response, we have:

**Approved your request** (check all that apply).

The accommodation is granted effective immediately.

We will provide the accommodation by (*date*).

Please contact me immediately to discuss and finalize details/paperwork regarding the approval of your request.

To make the change you requested, we must take the following steps \_\_\_\_\_.

We anticipate that the change will be made by (*date*), and we will notify you if there will be a delay. If you feel that this will take too long, please contact me immediately.

**Not approved your request**, because we need more information to properly consider the request (check all that apply):

Please provide information to verify that you or the person associated with you has a disability, as defined by federal and/or state law. You do not have to provide specific information about the disability.

Please provide more information or documentation (i.e. letter from medical professional, caseworker, service provider, peer support group, etc.) to explain the specific connection between the disability and the need for the requested accommodation.

**Not approved your request, but instead offer the following alternative:** \_\_\_\_\_

**Because** (fill in reason for offering alternative): \_\_\_\_\_

If you have questions or think that this alternative will not meet your needs, please contact me immediately.

**Denied your request**, because (check all that apply):

You were unable to verify that you or the person associated with you has a disability, as defined by federal and/or state law.

You were unable to demonstrate that the accommodation is needed because of a disability.

The accommodation you requested is not reasonable because:

It will cost (fill in amount) \$ \_\_\_\_\_ and/or \_\_\_\_\_ hours of staff time to make the change you requested and this is an undue burden on our operations.

It will fundamentally change the nature of our operations.

**Please contact me immediately so that we can discuss whether there are alternative accommodations that would effectively meet your needs.**

To make this decision, we spoke with the following people and/or took the following into consideration:

Additional comments: \_\_\_\_\_

If you disagree with this decision or have more information to provide to us, please feel free to contact me at the address or phone number listed below.

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## NOTES

The Fair Housing Act and other laws seek to end discrimination in housing based on race, color, religion, national origin, sex, familial status, disability, marital status, and age.

If you have questions,  
call the Fair Housing Center for help.



## Fair Housing Center of West Michigan

20 Hall Street SE • Grand Rapids, MI 49507

Phone: (616) 451-2980 or 1-866-389-FAIR (3247)

Fax: (616) 451- 2657 • E-mail: [contact-us@fhcwm.org](mailto:contact-us@fhcwm.org)

Website: [www.fhcwm.org](http://www.fhcwm.org)

*Please note that this guidebook is not intended to be used as legal advice.*

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