

Reasonable Accommodation Policy for Assistance Animals

Property Management Inc. Central Oregon LLC

1. Purpose of Policy

This policy outlines how **Property Management Inc. Central Oregon LLC** processes requests for **reasonable accommodations** involving **Assistance Animals**, including **Service Animals** and **Emotional Support Animals (ESAs)**, in compliance with the **Fair Housing Act (FHA)**, **HUD guidelines**, and applicable state and local laws. Our goal is to ensure residents with disabilities receive equal access to housing while maintaining consistent and lawful procedures.

2. Definitions

2.1 Assistance Animal

An Assistance Animal is **not considered a pet** and includes both Service Animals and Support Animals. Assistance Animals are exempt from pet fees, breed restrictions, and pet policies when approved as a reasonable accommodation.

2.2 Service Animal

Under the FHA and ADA, a Service Animal is a **dog** (or, in limited cases, a miniature horse) individually trained to perform tasks or work for a person with a disability. Examples: guiding individuals who are blind, alerting for seizures, pulling wheelchairs.

2.3 Emotional Support Animal (Support Animal)

An ESA provides **emotional or therapeutic support** that alleviates one or more identified symptoms or effects of a disability. ESAs do **not require specific training**.

3. Request Process for Reasonable Accommodation

3.1 Submission Requirements

Residents or applicants must submit a **Reasonable Accommodation Request Form**, which includes:

- Description of the accommodation requested
- If the disability or need is **not obvious**, supporting documentation from a **licensed health care professional** confirming:
 - The individual has a disability under the FHA
 - The animal provides disability-related assistance or support

3.2 Acceptable Documentation

Documentation may come from:

- Physicians
- Nurse practitioners
- Psychologists or psychiatrists
- Licensed clinical social workers
- Other licensed health care providers familiar with the resident's disability

NOTE: Documentation must be:

- Written on professional letterhead
 - Include the provider's full name, license number, licensing state, business address, and signature
 - Dated within the past 12 months (unless state law allows otherwise)
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4. Verification Procedure

4.1 Reviewing Documentation

Upon receiving documentation, **Property Management Inc. Central Oregon LLC** will review the information to ensure:

- It is complete
- It originates from a **legitimate, licensed health care professional**
- It adequately establishes disability-related need, consistent with HUD guidelines

4.2 Verification of Provider Credentials

To ensure authenticity, the company may:

- Verify that the health care provider is **licensed**, active, and in good standing using publicly available licensing databases

- Confirm that the provider's licensure information matches the details provided in the documentation

4.3 Provider–Patient Relationship Verification

In accordance with HUD guidance, the company **must be able to reasonably determine** that the documentation is from a health care professional who has a **current, established professional relationship** with the resident/applicant. A request may be questioned or considered insufficient if:

- Documentation appears to come from an online certificate mill or website that provides letters without a genuine clinical relationship
- Licensing details do not match the state where the applicant resides (unless allowed by telehealth laws)
- The provider's information cannot be validated through public licensing verification systems

If the company is unable to verify that the resident/applicant is under the care of the health care provider listed, the documentation will be considered insufficient.

4.4 Prohibited Actions

To comply with the Fair Housing Act, we will **not**:

- Request medical records
- Ask for specific diagnoses or clinical details
- Contact the provider to obtain health information or verify treatment
- Request personal or confidential details beyond those necessary to validate the documentation's legitimacy

4.5 Unverifiable or Insufficient Documentation

Documentation may be deemed **unverifiable or insufficient** if:

- It is incomplete
- It is from an unlicensed or non-verified provider
- It originates from an online seller or mass-produced certificate service
- It does not demonstrate a legitimate provider–patient relationship
- The provider's credentials cannot be authenticated
- The company cannot verify that the resident/applicant is under the care of the listed provider

Applicants will be notified in writing and given an opportunity to submit new or corrected documentation.

4.5 Denial of Request

A request may be **denied** if:

- Required documentation is not provided
 - Documentation cannot be verified (e.g., provider cannot be confirmed as legitimate)
 - Unable to verify that resident/applicant is in health care providers care
 - The request is unreasonable or poses a direct threat or undue burden
- If denied, the company will issue a written explanation.
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5. Responsibilities of Residents with Approved Assistance Animals

Residents must:

- Ensure the animal is well-behaved and under control
- Comply with local animal licensing and vaccination laws
- Maintain cleanliness and sanitation
- Cover costs of damages caused by the animal (not pet fees, but actual damages)
- Ensure the animal does not pose a direct threat or create substantial property damage

Failure to comply with these responsibilities may result in lease enforcement actions consistent with fair housing laws.

6. Confidentiality

All documentation and disability-related information will be kept **confidential** and maintained in secure files separate from general resident records.

7. Non-Discrimination Statement

Property Management Inc. Central Oregon LLC complies fully with the **Fair Housing Act**, and it is our policy **not to discriminate** against any resident or applicant on the basis of disability or any other protected class.

8. Policy Review and Updates

This policy will be reviewed periodically and updated as necessary to maintain compliance with federal, state, and local regulations.

Below is the updated clause integrated directly into the **Verification Procedure** section in a legally compliant way. This preserves adherence to Fair Housing Act rules, including HUD's 2020 Assistance Animal Guidance, which prohibits contacting a healthcare provider to ask about treatment details—but allows you to reject documentation when you **cannot confirm that the provider is legitimate or that the provider–patient relationship is valid.**