

July 11, 2024 Fair Housing in Criminal Background Screening & Tenant Selection Plans



Sponsored by a generous grant from the Michigan State Housing Development Authority (MSHDA)



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Introductions

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Agenda

- FHCWM and MI FHCs
- Fair Housing Laws & Protections Update
- State of Housing Discrimination
- 2024 HUD Guidance on Artificial Intelligence (AI)
 - Advertising
 - Screening
- Criminal Background Screening
- Applications & Selection
- Resources & Links





FHCWM Overview

- Founded in 1980 as a private, non-profit organization, grew out of a combined grassroots effort to desegregate schools and integrate neighborhoods.
- Mission To prevent and eliminate illegal housing discrimination, ensure equal housing opportunity, and promote inclusive communities. We achieve our objective through education, outreach, research, advocacy and enforcement.
- *Cannot* provide legal advice, no attorneys on staff.
- Information provided today is for educational purposes only.





Michigan Fair Housing Centers

Fair Housing Center of Metropolitan Detroit

Fair Housing Center of Southeast & Mid MI

Fair Housing Center of Southwest MI

Fair Housing Center of West Michigan





FAIR HOUSING RESOURCES



What is Fair Housing?

Fair housing law is the right of individuals to obtain housing of their choice free from discrimination based on protected classes under federal, state and local fair housing law.







What is Fair Housing?

- Fair housing protects against discrimination in <u>any</u> housing transaction including rentals, sales, lending, and insurance.
- Where you live affects how you live being able to choose freely is important!





Protected Classes

Federal

- Race
- Color
- National Origin
- Sex (including Sexual Orientation, Gender Identity,)
- Religion
- Disability Status
- Familial Status

HUD Equal Access Rule

- Marital Status
- Sexual Orientation
- Gender Identity
- Expanded definition of family

<u>State</u>

All federal protected classes, plus:

- Marital Status
- Age
- Sexual Orientation
- Gender Identity
- Gender Expression

<u>Local</u>

• Homework!

MI Law Update

- Michigan's Elliott-Larsen Civil Rights Act (ELCRA) was amended to add sexual orientation and gender identity or expression as protected classes on March 16, 2023, to take effect "91 days after adjournment of the regular session."
- <u>Amended ELCRA</u> with these protections is effective as of February 13, 2024.
- Sexual Orientation having an orientation for heterosexuality, homosexuality, or bisexuality or having a history of such an orientation or being identified with such an orientation
- Gender identity or Expression having or being perceived as having a gender-related self-identity or expression whether associated with an individual's assigned sex at birth or not





Local Fair Housing Laws

- Check with your local Fair Housing Center
 - <u>Grand Rapids</u>, Ypsilanti, Detroit, Kalamazoo, Flint (Legal Services)
- Check with your local municipality
 - <u>https://library.municode.com/mi</u>
 - <u>https://codelibrary.amlegal.com/regions/mi</u>
 - Ann Arbor, Detroit, East Lansing, Grand Rapids, Holland, Kalamazoo, Kentwood, Lansing, Traverse City, Wyoming just to name a few.





Local Fair Chance/Access Housing Laws

- Ann Arbor, Detroit, Jackson, others?
- Check with your local Fair Housing Center
 - <u>Grand Rapids</u>, Ypsilanti, Detroit, Kalamazoo, Flint (Legal Services)
- Michigan Fair Chance Bill introduced 2022, 2023; <u>House Bill No. 4878</u> would prohibit landlords from using an applicant's criminal record to deny them housing, aside from specific cases involving sex offenders and arsonists.





140 Fair Housing Center Cases in 2023



Takeaway

What do we need to know to know if the applicant can be a good tenant now?

- Why are we requiring or asking this?
- What is this screening standard trying to get at?
 - Is it giving you information that is actually being used?
 - Note: requesting/having information related to protected classes that does not have a business justification tied to it creates risk because you have the information.
- Is it actually required?

Verify – what is the source that you can point to?





HUD ARTIFICAL INTELLIGENCE (AI) GUIDANCE - 2024





NEW HUD AI Guidance

- HUD <u>Issued</u> Fair Housing Act Guidance on Applications of Artificial Intelligence on April 29, 2024
- Two guidance documents addressing the application of the Fair Housing Act to two areas in which the use of artificial intelligence (AI) poses particular concerns:
 - 1. tenant screening process
 - 2. <u>the advertising of housing opportunities</u> through online platforms that use targeted ads.







HUD AI GUIDANCE - ADVERTISING





Guidance on Application of the Fair Housing Act to the **Advertising** of Housing, Credit, and Other Real Estate-Related Transactions through Digital Platforms, 2024

 Explains how the Act applies to the advertising of housing, credit, and other real estate-related transactions through digital platforms, including automated systems, such as algorithmic processes and Artificial Intelligence, to facilitate advertisement targeting and delivery.





HUD 2024 Guidance – AI & Advertising

- Ad targeting risks discriminating based on protected classes in violation of the Act in multiple ways, including:
 - denying consumers information about housing opportunities;
 - targeting vulnerable consumers for predatory products or services;
 - discouraging or deterring potential consumers;
 - \circ advertising different prices or conditions to consumers;
 - steering home-seekers to particular neighborhoods; or
 - charging advertisers higher amounts to show ads to some consumers.





HUD 2024 Guidance – AI & Advertising

- Advertiser is defined as "entities or individuals placing advertisements for any one of the full range of products and services covered by the Act, which includes rental housing and property management services, residential real estate and related services, mortgages and mortgage broker services, home insurance, and more."
- Ad platform is defined as "products or systems used to direct and deliver advertisements to consumers in digital spaces—sometimes on a single website or mobile application, such as a social media or real estate website, and other times across many websites, mobile applications, or other channels."





Best Practices - Advertising

- Review advertising materials/social media for fair housing implications **before** publishing or posting
 - Describe the property, NOT the people i.e., people for whom you may think the property is "ideal for".
 - Advertising, under the Fair Housing Act, includes promotional materials, newspaper ads, internet ads, and any verbal statements made.
- When in doubt, take it out!
- Use the EHO logo



We Do Business in Accor House	Acception of the Federal Fair	
Because of Race, Co	atus, or National Origin	
 In the safe of rental of nousing of residential lots In advertising the sale or rental of housing 	In the appraisal of housing	
In the financing of housing	Blockbusting is also illegal	
Anyone who feels he or she has been discriminated against may file a complaint of howing discrimination: 1.840 649777 (Tolk Free) 1.490-927.9275 (TTY) Pressue closure schedure	C.S. Department of Housing and Visban Development Avaluat Secretary for Fair Housing and Equal Opportunity Washington, D.C. 2000	



HUD AI GUIDANCE - SCREENING





HUD 2024 Guidance – AI & Screening

Guidance on Application of the Fair Housing Act to the **Screening of Applicants** for Rental Housing, 2024

- Discusses how housing providers and companies that offer tenant screening services can screen applicants for rental housing in a non-discriminatory way and recommends best practices for complying with the Fair Housing Act, which applies to housing decisions regardless of what technology is used.
- Includes common fair housing issues and suggests how housing providers and screening companies can avoid discriminatory screenings.





For Non-Discriminatory Screenings (p. 11-15)

- 1. Choose **relevant** screening criteria
- 2. Use only accurate records
- 3. Follow the applicable screening policy
- 4. Be transparent with applicants
- 5. Allow applicants to challenge negative information
- 6. Design & test complex models for fair housing **compliance**





- 1. Choose **Relevant** Screening Criteria
 - Focus on information tied to their likelihood of compliance with tenancy obligations
 - Be precise
 - Waive criteria if they are not relevant to the applicant's individual circumstances, such as minimum income for the applicant whose rent will be paid by 3rd party
 - Prioritize recent records
 - Avoid screening incident-free, current tenants
 - Don't use records without a negative outcome ex. An eviction where the tenant prevailed. If not clear, disregard unless you can get additional info.





- 2. Use Only Accurate Records
 - "Datasets used for tenant screenings are often incomplete, missing key personal identifiers or updated infrequently."
 - Records of people with the same or similar names are erroneously attributed to the wrong person; this is more common for Hispanic, Asian or Black individuals.
 - Records should match multiple pieces of info; "wildcard" or "name-only" matching should not be used.
 - Where is the data coming from? Is there any data clean up undertaken? How/how often?





- 3. Follow the Applicable Screening Policy
 - Do not consider records outside of the scope of your stated policy.
 - Ex. Don't consider a misdemeanor if the policy is screening for felony convictions.
 - Check to see if the screening company is using your standards/conforming to your policy.
 - Don't ask applicants for any history (criminal, credit or housing) that falls outside of your policy.





4. Be **Transparent** with Applicants

- "Tenant screening policies should be in writing, made public, and readily available to potential applicants."
- Systematically give applicants complete, detailed info; give copies or link to website.
- Transparency is important so people know how they will be screened and why they were denied.
- Also helps them decide whether to pay the fee/take the time to apply.
- Give info on how to submit mitigating circumstances, reasonable accommodation requests, and how to contest an inaccurate/incomplete/irrelevant record.





Guiding Principle 4 cont.

- 4. Be **Transparent** with Applicants *cont*.
 - "Denial letters should contain as much detail as possible as to all reasons for the denial, including the specific standard(s) that the applicant did not meet and how they fell short.
 - "For example, rather than saying "you were denied because of your credit score," the letter should say "you were denied because we require a credit score of XXX and you have a credit score of XXX according to XXX service."
 - "If an applicant fails multiple screening criteria, all of those criteria should be included in the denial letter. All records relied on should be attached, including any screening reports."
 - "Denial notifications should also instruct applicants how to submit an appeal if a record is inaccurate, incomplete, or irrelevant; mitigating circumstance exists; or a reasonable accommodation for a disability is needed."





- 5. Allow Applicants to Challenge Negative Information
 - Allow applicants the opportunity to challenge any potentially disqualifying information or dispute accuracy.
 - Provide them the info used in the review with the specific standards at issue, in a way that is easy to understand why they were denied.
 - They should also have a chance to show, even if a record is accurate, that they will comply with tenancy obligations regardless.
 - Minimum income standard requirements for HCV holder
 - Attended rehabilitation or financial literacy program
 - Change in education or employment status





- 6. Design & Test Complex Models for Fair Housing Compliance
 - "Complex models, such as those that use machine learning or other forms of AI, should be programmed following best practices for nondiscriminatory model design and with attention to aspects especially likely to pose fair housing concerns."
 - Levels of precision can help avoid discriminatory effects.
 - Certain data for specific demographic groups can be limited and are influenced by history and ongoing discrimination.
 - "Evaluating the data used by a model, creating test data, and rigorously testing to validate the model can reveal whether it has disparate outcomes and what less discriminatory alternatives might exist."





Additional Considerations (p. 15-22)

1. Credit History

- "Credit scores are calculations made based on a consumer's credit report designed to assess the relative risk of consumers defaulting on a loan (i.e., not the risk that a tenant will fail to pay rent)."
- Credit scores do not capture timely rent, utility, and other bill payments nor pay-day/non-traditional lenders.
- Disparate impact on people of color, persons with disabilities, and survivors of domestic violence.
 - Overbroad screenings may have an unjustified discriminatory effect on these groups.
- What are we trying to get at? Will they pay their rent? Is there another way we can get at it? Alternative: income verification.





1. Credit History cont.

- No known studies on the relationship between credit reports/scores and successful tenancy
- Many households prioritize paying rent over other debts, but this is not considered in their favor
- Avoid denials when the score credit score in circumstances when the applicant's financial background has especially little relevance – ex. HCV holder, co-signer, medical or family emergency, Domestic Violence.
- Allow for explanation, waiver for reasonable accommodation due to disability





1. Credit History cont.

- Having no credit history or limited is even less relevant than having poor credit history.
- Admitting applicants so long as they do not have a negative credit history can be a more precise policy than requiring a positive credit history.
- Automated screening tools can be programmed to rely on other available financial information as a substitute for an absent credit score.





2. Eviction History

- Most commonly marketed screening component, standard feature; private databases from court records
- "Court records of evictions are notably unreliable: 22% of the eviction records evaluated in a large study contained ambiguous information on how the case was resolved or falsely represented a tenant's eviction history."
- Disproportionately impacts Black and Hispanic renters, women, families with kids, and persons with disabilities.
 - Overbroad screenings for eviction history may have an unjustified discriminatory effect.





2. Eviction History cont.

- Should not rely on eviction records that are old, incomplete, irrelevant, or where a better measure of an applicant's behavior is available.
- Take into account those who have a disability, are being retaliated against, history of DV, dating violence, or assault.
- Applicants should get the chance afterward to have the record disregarded and corrections made.
- Note that under the Fair Credit Reporting Act, tenant screening companies must include existing disposition information for eviction records.




2. Eviction History cont.

- Do not deny applicants based on eviction proceedings when the tenant prevailed, a settlement was reached, or it was dropped.
- Discount "No fault" evictions (the property was removed from the market), distinguish different types of evictions and varied outcomes.
- What do we need to know about the eviction to find out if they can be a good tenant now?
- Why? When? What were the circumstances? What if it was long ago or the circumstances no longer apply?





3. Criminal Records

- "Persons who have been involved with the criminal justice system are disproportionately individuals with disabilities and Black and Brown persons, and therefore overbroad criminal records screening policies are likely to have an unjustified discriminatory effect."; due to bias in the system.
- See prior HUD Guidance (2016, 2022) on criminal background screening applies to screening companies and housing providers; outlines overbroad screenings.





3. Criminal Records cont.

"As a best practice, tenant screening companies should ensure that screening reports, recommendations, grades, and algorithmic models differentiate between criminal records on these [HUD 2016, 2022 Guidance] bases — such as by excluding records that are old or for offenses not directly relevant to tenancy — and housing providers should account for these considerations when formulating screening policies and reviewing applications."





3. Criminal Records cont.

- Criminal activity should not be taken into account if it was due to an underlying experience of domestic violence, such as being forced to write bad checks or property damage incurred during a violent incident.
- Reasonable accommodations may be required, such as making exceptions to admissions policies or disregarding certain criminal records.
 - A person's disability might make it unlikely that they would reoffend.
 - Past criminal activity related to a mental health disability that has since been treated.





- 1. Role of Housing Providers (HP)
 - Remember HPs are liable regardless of use of a screening company
 - Develop policies/practices that ensure that all denials reflect your own judgement
 - Adopt screening policies that are clear, detailed, and publicly available
 - Only use services that help implement your policy
 - Customize criteria, standards, and weights being used vs. "off the shelf" product to ensure compliance to your policy





1. Role of Housing Providers *cont.*

- If you get a screening report with a denial, you should make an independent determination under your policy whether the information in the report is in fact disqualifying.
- If NOT, you should accept the applicant and consider contacting the company to adjust screening standards.
- No matter who finds the disqualifying info, applicants should be given the same opportunity to dispute accuracy/relevance of any negative info.
- You are ultimately responsible for ensuring applicants have a full opportunity to contest the accuracy or relevance of any potential ground for denial.





1. Role of Housing Providers cont.

- In selecting a tenant screening company, you should inquire into the ways in which the company ensures its screenings are accurate and nondiscriminatory.
- You should select screening services that (a) offer customizability; (b) frequently update their data; (c) monitor for unjustified discriminatory effects; (d) report clear and specific reasons for denials; (e) allow individuals to correct inaccuracies; (f) publicly disclose key details about their screening systems; and (g) comply with all applicable Federal, state, and local laws.
 - Maintain documentation!!!





2. Role of Tenant Screening Companies

- Should disclose more info including safeguards in place, sources they draw info from, how they ensure accurate and complete records, and how decisions are made.
- Should conduct Civil Rights monitoring such as checking their inputs for protected characteristics (or close proxies).
 - Use your list of applicable protected classes!





2. Role of Tenant Screening Companies cont.

- NOTE: Even when protected classes/close proxies are removed, the tech may compensate for that by altering the importance/weight placed on remaining factors, thereby recreating discriminatory outcomes.
- Monitoring should look at whether any datasets are more inaccurate or incomplete for certain groups.
- Monitoring should include looking at the outputs for unjustified discriminatory effects.





2. Role of Tenant Screening Companies cont.

- Should serve to implement, rather than set, a HP's policies.
- Should offer customizability.
- Should not offer options that are fair housing concerns such as unlimited or lifetime lookback periods for criminal records.
- Should either not provide default standards or set them to the least exclusionary options.
- Should provide all available relevant details (dates, case numbers, dispositions) and data sources and use plain language.
- Denials or low 'grades' should not be given in a conclusory fashion.





2. Role of Tenant Screening Companies cont.

- Under the Fair Credit Reporting Act, these companies must provide a mechanism for individuals to dispute inaccuracies and have them corrected.
- This process should also enable applicants to dispute whether a record should be included in their file as a potential grounds for denial of tenancy even if the record is accurate (e.g., an eviction related to domestic violence).
- Should send corrected reports, scores, and recommendations to the HP and applicant, and carry forward corrections to all future screenings the screening company does of that individual. This process should be relatively quick.







CRIMINAL BACKGROUND SCREENING





Criminal Background Screening

- HUD issued <u>guidance</u> for Public Housing Agencies (PHAs) on 11/2/15; <u>proposed rule</u> released on 4/10/24 on Reducing Barriers to HUD-Assisted Housing
- HUD issued guidance for the private market on <u>4/4/16</u> and <u>6/10/2022</u> (NEW), regarding a process for evaluating applicants with a criminal record.
- Having a criminal record is still not a federally protected characteristic.
- See handout FHCWM Fact Sheet.





PHAs and project owners MUST deny admission to:

1. Anyone who has been convicted of **manufacturing methamphetamine on federally assisted property**;

2. Anyone subject to lifetime registration for a sex offense;

3. Current users of illegal drugs, abusers of alcohol, or pattern interfering with health, safety, peaceful enjoyment; or

4. Anyone who, within the last 3 years, has been evicted
from federal housing for drug-related criminal activity unless
(1) drug rehabilitation or (2) circumstances leading to eviction no longer exist.





PHAs – Discretionary Bans

PHAs and project owners MAY consider denying admission, evicting or terminating for:

1. Drug-related criminal activity – manufacture, sale, distribution, use, or possession;

2. Violent criminal activity – use of or threatened use of physical force that will cause serious bodily injury or property damage;

3. Other criminal activity that would **adversely affect the health, safety, or right to peaceful enjoyment** of the premises by other residents, the owner, or public housing employees.





PHAs – Discretionary Bans

- PHAs and owners are NOT required to have 'one strike' policies
- Have discretion to deny, evict or terminate based on certain types of criminal history
 - Seriousness of offending action
 - Effect on entire household (those not involved)
 - Any steps taken by leaseholder to prevent or mitigate criminal activity
 - Participation in rehabilitation programs





2022 - Use of Criminal Records

- Notably, the Guidance cites research that "Criminal history is not a good predictor of housing success". (<u>Source</u>)
- It further states that private housing providers should consider not using criminal history to screen tenants for housing.





2022 - Examples

Examples of evidence of disparate treatment include:

- Not advising ALL applicants of policy.
- Not applying policy to ALL applicants.
- Rejecting comparably qualified applicants based on criminal record and other protected class (race).
- Discouraging some (protected) applicants and encouraging others, offering some applications and withholding applications from others.





2022 - Examples

- A housing provider evicted a Black tenant who was convicted of a crime but did not evict a White tenant who was convicted of a similar crime.
- After learning that an applicant was previously homeless and hospitalized for treatment of a mental health condition, a management company departed from its standard procedures and conducted a criminal background screening of the applicant.





HUD Best Practices - Procedures

- Per HUD guidance, consider not using criminal history to screen tenants for housing.
- Check for state or local laws or that may limit ability to run criminal background checks.
- Check for any applicable program requirements, regulations, or restrictions.
- Avoid third-party screening companies that use biased algorithms.
- Have a written criminal background screening policy that is available to all applicants.
- Delay considering criminal history until after verifying financial and other qualifications.
- Treat comparable criminal histories similarly.





HUD Best Practices - Procedures

- Before denying an applicant or evicting a resident, provide them the criminal record and give them the opportunity to correct wrong information or explain extenuating circumstances.
- Only evict for criminal activity as a last resort and after an individualized assessment.
- Never evict a person or family because they have been victims of a crime.
- Do not ban a tenant's invited guest from visiting based on the guest's criminal involvement.
- **Document** any screening completed, circumstances considered, and decisions made.





HUD Best Practices - Policies

- Consider the nature, severity (i.e. felony or misdemeanor), and recency of criminal conduct.
- Ensure policy can be justified with reliable evidence showing that it actually assists in protecting resident safety and/or property.
- Accurately distinguish between criminal conduct that indicates a **demonstrable risk to resident safety and/or property** (i.e. homicides, sexual assault, arson, etc.) and criminal conduct that does not (i.e. gambling, prostitution, tax crimes, cyber-crimes, etc.).
- Avoid automatic denials, blanket bans (i.e. "no felonies") and consideration of arrests.
- Consider the amount of time that has passed since the criminal conduct occurred.





HUD Best Practices - Policies

- Provide for an **individualized assessment** of relevant mitigating information.
 - Consider the circumstances surrounding the criminal conduct, the age of the individual at the time of the conduct, evidence that the individual has maintained a good tenant history before and/or after the conviction or conduct, and evidence of rehabilitation efforts.
 - Consider requests for reasonable accommodation on the basis of disability.





Plan/Criteria - Common Issues, Risk

- Extensive list of convictions, many of which are unrelated to property or resident safety.
- Broad categories (family relations, government, public peace, etc.)
- Vague language (may be denied if a felony is evident)
- Not defining the type of crime in policy.
- Lifetime or unreasonable lookback periods
- No opportunity for individualized assessments, especially before denial.





LIHTC & HUD

- Regarding criminal history, the LIHTC Compliance Manual, Chapter 6, Part 614 defers to HUD Handbook 4350.3.
- <u>HUD Handbook 4350.3</u>, particularly pages 4-18 and 4-19 outline criminal background screening criteria. The following language appears on page 4-18:
- Owners must establish written screening criteria to prohibit the admission of certain individuals who have engaged in drug-related criminal behavior, or are subject to a State lifetime sex offender registration program, or are individuals whose abuse or pattern of abuse of alcohol interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents. Owners may choose to expand these requirements regarding prohibition of admission to certain applicants [24 CFR part 5, subpart I & J].







APPLICATIONS & SELECTION





What information is necessary at what point?

- Applications should collect information relevant to objectively determine whether or not an individual qualifies for an available housing opportunity.
- Ensure that unlawful questions are not asked in person or on the application.
- Review for information collected but not used, especially in regard to protected classes.
 - Burden shifts to show how information collected did not influence housing access/decision-making





Blanket Inquiries

Congress' Prohibition of "Blanket Inquiries" by a Landlord as to an Applicant's Disability.

- Can't ask overbroad questions as to the description, nature or severity of the disability.
- Can't ask the applicant or tenant to waive the right to confidentiality concerning their medical condition or history.



<u>24 CFR § 100.202</u> - General prohibitions against discrimination because of handicap.



Plan/Criteria – Common Issues, Risk

- Outdated list of applicable fair housing protections
- Outdated plans online, given out
- Practices in use are different than plans
- Incorrect or more narrow definitions that do not align with legal definitions of protected classes.
- Unreasonable, outdated or blanket occupancy standards that do not take into account the size of the unit, layout, bedroom size, etc.
- Clarity/readability or ease of use





Tenant Selection - Best Practices

- Include all criteria used in the decisionmaking process
- ➢ Be specific
- ➢ Be written and accessible
- Describe an appeals process
- State the right of an applicant with a disability to request a reasonable accommodation
- Include a nondiscrimination statement





Best Practices

- Refer to the list of protected classes that cover the property area.
 - How would an applicant or resident treatment vary by protected class?
 - Is there any adverse treatment or unintentional barriers?
 - Who is left out?
 - Could you defend any findings as nondiscriminatory?
 - Evidence?







Resources & Links





MSHDA Links

- MSHDA Home page
- MSHDA Fair Housing page
- MSHDA Fair Housing Policy Statement
- <u>Compliance for Rental Housing</u>
- LIHTC Compliance Monitoring Manual
- Housing Choice Voucher Program





Tools & Resources

- <u>https://fhcwm.org/fair-housing-laws</u>
 <u>https://fhcwm.org/publications</u>
 Publications, brochures, studies and guides by topic area
 - Fact Sheets, Resource Guides, Guidebooks
 - Advertising
 - Occupancy Standards
 - Senior Housing
 - Condominium Associations
 - Criminal Background
 - Zoning/Land Use
 - AFFH

- Disability
- Families with Children
- Limited English Proficiency (LEP)
- Gender/Sexual Harassment
- LGBTQ+
- Immigration Status





Questions?

- Reminder: Evaluations with attendance questions will open in your browser. Certificates can be requested in the evaluation.
- https://www.surveymonkey.com/r/MSHDA-CBTSP2024
- FHCWM Upcoming Online Trainings:
- <u>https://fhcwm.org/trainings</u>
 - August 22, 9 am 12 pm 101 for Rental Professionals
 - August 27, 1 2 pm Fair Housing & Appraisal Discrimination
 - August 28, 9 10:15 am FH for Maintenance Professionals
 - September 26, 12 1 pm Fair Housing & Protections against Sexual Harassment

Thank you!!!



