

April 10, 2003

# CBE

## Credit Bureau of Evansville

*Do's & Don'ts  
For Screening  
Residents In  
Today's  
New World*

*Is Credit History  
Alone Sufficient  
In Making That  
Decision?*

*What Is the  
Fair Credit  
Reporting*

*Verifying  
An Applicants  
Identity*

# Fair Housing Day



**Protect Your Community ~ Protect Your Residents**

*Presented by*

## **Credit Bureau of Evansville**

An affiliate of



## **CBC Companies**

With the ownership and operation of credit bureaus throughout the country, CBC Companies, parent company of Credit Bureau of Evansville, Inc. has been serving the credit industry for more than 50 years.

The CBC family of corporations includes some of the largest & most experienced service-oriented companies in the country. Our companies provide mortgage reports, collection services, flood zone determinations and automated decision systems. Among those companies and affiliates is AmRent, CBC's resident screening division. Dedicated solely to the Multi-Family Housing Industry, AmRent provides products and services essential to resident screening. Criminal records, eviction cases, property supplied resident information and collection accounts are all included in the array of data gathered nationally. AmRent's goal is to provide quality service and innovative products designed exclusively for the Multi-Family Housing Industry.

**Expect the Best from CBC Companies.**

**Heightened Awareness  
Suggested Owner/Management**

**Action Items**

The following action items are not intended to be an inclusive list of procedures and practices. Owners and managers may choose to apply these and other actions, as they deem necessary or appropriate. Fair housing compliance must be strictly enforced at all levels in the application of these items.

**In the Leasing Office/Screening**

- Require original identification documents to prove identity
- Require each adult occupant to complete an application
- Require identity documentation for each adult occupant
- Require identity documents to include a government issued photo identification
- Deny housing to aliens without proper papers – it's a federal crime to be in the country illegally
- For non-US citizens accept only Form I-551 Permanent Resident Card; Form I-688 Temporary Resident Card or Form I-688A Employment Authorization Card or any INS receipt for replacement of one of these three
- For non-US citizens require that INS form I-94 Arrival-Departure Record be accompanied by a passport and visa from the applicant's home country
- Compare different identity documents to each other for same addresses, birthdates
- Make photo static copies of photo identification documents
- Print latest FBI "criminal" lists (3) – Most Wanted, fugitive and terrorist.

**Compare to applicants' photo and identity**

- Consider running credit reports from more than one source – Experian, TRW, Transunion
- Match credit report addresses to those on the application
- Require the applicant to respond to gaps in housing history
- Run criminal reports in both new location and previous location.
- Run social security number checks on all occupants
- When leasing to students, require original school documentation of the student's enrollment for the semester
- If application is rejected because of failing any part of the identity document screening, consider delaying actual rejection until after law enforcement authorities have been contacted
- Be thorough in executing your screening – if you ask for a reference or address, then check it

**Heightened Awareness**  
**Suggested Owner/Management**  
**Action Items**

## **Management Policies on the Property**

- Take photographs of suspicious vehicles/persons/evidence
- Monitor the property for suspicious behavior
  - Frequent visitors at a unit
  - No one seen leaving the unit
  - Use of pay phones in the area
  - Taking multiple photographs of area or nearby landmarks
- Perform move-in inspections diligently and, if possible, monitor the move-in process during the day as it occurs (who and what appears to be moving in)
- Strictly enforce a "no solicitors" policy on the property. Escort trespassers off the site, call police if necessary
- Accompany or closely monitor service providers who come on site
- If car break-ins occur, check with the victims to ensure apartment cards or keys were not stolen
- Check contractor's work and work areas both during and upon completion of service. Pay particular attention to non-public areas or areas used to store their equipment or supplies
- Require proof from contractors that they screen their employees
- Keep shops and other company areas locked and inventories secure when not occupied
- Establish a hand signal or code for employees to use with each other in the case of a threatening or unusual situation on the property
- Inspect amenity areas daily for any unattended parcels, packages
- Keep trash containers in common areas emptied
- Ensure house lighting is fully functional, consider adding more
- Ensure access gates are working
- Consider installing a two-stage access system to discourage "tailgating" in to the property
- Maintain accurate inventory of tools and supplies and recheck inventory more frequently, especially items such as caustics, chlorine, wiring, etc.
- Keep key machines locked and inaccessible
- Check vacants frequently to ensure they are vacant and secured
- Closely monitor parking lots for unauthorized or abandoned vehicles
  - act quickly within local statutes
- Expand daily inspections to include all perimeters for suspicious items. Note mailboxes, storage sheds, utility rooms or closets and landscaping around buildings

# COUNTERTERRORISM EFFORTS AND FAIR HOUSING

## *Apartment Management and Law Enforcement Working Together*

**By Mark S. Alper and Nadeen Green, Esq.**

June 2002

The terrible and tragic events of September 11, 2001 have resulted in an increased awareness of the likelihood of future terrorist attacks aimed against the United States and its citizens. The Office of Homeland Security has been established, and law enforcement organizations at the federal, state and local level have organized a variety of efforts to counter terrorism.

One recent initiative, in response to uncorroborated information received by the Federal Bureau of Investigation (FBI), has involved law enforcement contact with multifamily housing managers and other real estate professionals to enlist the aid of that industry in the fight against terrorism.

The focus of this article is to suggest ways that the multi-family housing industry can balance the efforts of law enforcement authorities and the fair housing civil rights of those who seek apartment housing or who are currently residents at our apartment communities.

The United States Congress, recognizing that housing and shelter is the most fundamental of human needs, has enacted numerous pieces of legislation to establish and enforce civil rights in this area. The most significant regulation in this regard is the Fair Housing Act of 1968, amended in 1988 (FHA). This law states that it shall be illegal to discriminate in the sale, conditions or rental of housing based on race, sex, color, national origin, religion, disability or familial status. The scope of the law includes virtually all housing in the United States, both public and private, with the exception of owner occupied dwellings of fewer than four units.

Under the FHA, housing providers are liable for any acts which discriminate, or have the effect of discriminating, against one or more of the classes of persons protected by the Act. Many states and local governments have enacted similar laws, and have in some cases expanded the coverage to classes of persons not included in the federal statute (e.g., gay individuals, welfare recipients, etc.). There are significant financial penalties attached to violation of these laws. Not only are there civil penalties, there are no limits on punitive damages should the aggrieved person be successful in taking his or her case to the federal courts. Jury verdicts have been in the millions of dollars for FHA violations.

Many if not most multi-housing providers are well educated on the above rights of prospects and residents. Because our industry is so familiar with the topic of fair housing, we may not stop to realize that many if not most law enforcement personnel will not be aware of this area of civil rights law. When law enforcement authorities ask for our help (on a formal or informal basis) we must keep in mind the fair housing implications...that

7. Direct law enforcement personnel to the resources that may be available to them without the involvement of management personnel.

- For example, many multi-housing providers conduct credit background checks on all applicants and an increasing number of providers conduct criminal background checks as well. With respect to the former, there are a few large credit reporting agencies who have a large segment of the business such as TransUnion, Equifax, and Experian. Law enforcement agents should be able to obtain that information directly from the credit bureau.

- With regard to criminal background checks, housing providers do not have access to the NCIC. Therefore, the criminal checks are routinely done through state police organizations, and this information should likewise be readily available directly to law enforcement personnel.

- In the event the housing provider is receiving federal financial assistance from the United States Department of Housing and Urban Development (HUD), law enforcement may be aided by the requirements of Section 214 of the Housing and Community Development Act. This law, enacted by the Congress in 1980 but not implemented until 1995, requires that all residents in housing funded by HUD be either United States citizens or non-citizens with eligible immigration status (e.g., green card; visa, etc.). All applicants for HUD-funded housing who are not United States citizens must produce documents attesting to their legal right to be in the United States and the housing provider must verify that information with the Immigration and Naturalization Service (INS) through that agency's Systematic Alien Verification for Entitlements (SAVE) system. This information, being duly recorded by the INS, should also be available for inspection by law enforcement. HUD's Office of Inspector General (HUD-OIG) is their law enforcement division and has responsibility for liaison with state police agencies and the United States Department of Justice, and can serve as an additional resource in this area. It is thought that terrorists or suspected terrorists will seek to "blend in" to the maximum extent possible and are unlikely to have anything in their background (e.g., derogatory credit or criminal records) that will draw attention to themselves. Nevertheless, that information is readily available to law enforcement from the above resources and may assist in identifying known associates, or known aliases.

We need to remember that the multi-housing professional is ultimately responsible for any alleged violation of the civil rights protected under the Fair Housing Act, and perhaps even as a result of the law enforcement agent's conduct if such has been done with our approval or help. Even if a complaint is totally without foundation and

## Quick Tips

1. Ask the prospective resident to provide rent receipts for the last three months of his current address.
  - Did the applicant pay on time?
  - Is the address on the receipt consistent with the current address on the application?
  - Is the name on the receipt consistent with the name of the applicant?
2. If possible, look at the license plate on the applicant's car.
  - Is it from the same state indicated on the application?
  - Is it the same plate number, make, and model car indicated on the application?
3. Check the first three numbers of the social security number provided by the applicant.
  - When comparing it to the social security chart provided, it is consistent with the address history on the application and screening report?
4. Is the social security number on the application consistent with
  - the resident screening report?
  - a pay check stub?
  - a W-2 form or tax return?
  - social security card

## Red Flags

There are an endless amount of red flags that may signal a potential problem resident. You or your manager must be looking for them and be prepared to react to them in appropriate manner. Remember be alert, be skeptical, and cross check information. A few red flags:

1. Refusal of a prospective resident to completely fill out the application.
2. Refusal of a prospective resident to provide necessary documentary proof of information on the application.
3. Inconsistencies on the application itself or between the application and something the prospective resident has said.
4. Information that, upon verification, appears to be false or inconsistent.
5. A prospective resident that appears nervous or in a rush to move in. He tries to dissuade you from verifying the application and basically encourages you to trust him.
6. An applicant without a bank account may indicate a lack of stability.
7. An applicant indicating he is self employed but provides no documentation substantiating a legitimate business (i.e. business license, bank account, business address, etc.)

## **Address History**

The importance of an address history cannot be over stated. In terms of fraud detection, confirming an accurate address history at the time of screening may be the one fact that cannot be recreated from the person whose identity may have been stolen.

If you suspect that the address history is inconsistent with the other documentation provided by the applicant ask for copies of old checks, tax returns, or other evidence confirming these addresses. The screening report should also provide an address history consistent with that represented on the application.

If the address history is accurate, it may be very helpful to an investigator searching to locate an evicted resident.

## **Banks and Savings Accounts**

Although the importance of the information may appear obvious to many, it always amazes me how many owner / property managers overlook it or don't check it out. A prospective resident that does not have a checking account is a red flag. My experience has consistently shown that an adult without a checking account is probably a very high risk resident. They either could not get an account due to improper identification; illegal alien status or their account was closed by the bank for bouncing too many checks. In any event, owner / property managers beware.

Assuming your prospective resident has a bank account, check it out. Call the bank to confirm the funds and ask for an account rating. Most banks will indicate when the account was opened, the range of their average balance and verify whether or not the check they have given you is good. Do not let them move in until you have received this information.

Once again the information provided is perfect for cross checking. Are the names and addresses on the check consistent with all of the other information provided? If a photocopy machine is not available, write the bank name, address, and account number on to the application.

If the name on the check happens to be someone other than your prospective resident, ask questions. Is it a prospective roommate? A parent helping out? If so, this may indicate the need for a co-signer.

The existence of a bank account is an indication of stability and responsibility. It is also an indication of where to go to levy money in the event the resident gets evicted for defaulting on the rent. An added precaution I always advise my clients is to confirm the bank account information each month the rent is paid. Doing this will ensure that your records are always kept current and will flag a possible change in responsible parties or a resident in trouble.

## Birth Data

### **Date of Birth**

Although a fairly simple request, it is often incomplete or inconsistent with other information. First of all get a complete date of birth - month, day, and year. Very often this is the only thing to differentiate people with similar or common names. Secondly, be sure it is consistent with all other information. Compare it to a driver's license and any other information available.

### **Place of Birth**

The city and state or country of origin is valuable for verification and additional crosschecking or other evidence. Remember, every piece of information must be consistent with every other. The place of birth may reflect an inconsistency with the origin of the social security number or list of previous residences. An accurate place of birth will help locate relatives in case the need arises to locate the resident for collection purposes.

### **Mother's Maiden Name**

Along with place and date of birth, knowing a mother's maiden name can be the most important piece of the puzzle when searching for assets. A mother's maiden name not only helps confirm the applicant's background, but also may be the difference in locating assets and detecting fraud.

## Criminal Background Checks

Given the rising crime in our urban areas, property owners must be concerned with introducing a dangerous or undesirable resident into their building. The proliferation of drugs and gangs in cities throughout the United States has turned once beautiful neighborhoods into blighted and unsafe war zones. As a property owner, you must protect your residents as well as your investment.

Nearly all criminal records are public. Generally, the easiest access to criminal records is through your resident screening provider. When ordering your screening report, most companies offer an option of a criminal background check. The response varies from immediate (online) up to a couple of days depending upon the county or state you are pulling records from. Since there is no single source for criminal background checks nationwide, your information provider must access from different depositories throughout the country. Therefore, criminal background checks are usually priced on a per county or per state basis.

Before ordering a criminal background on a prospective resident, it is important that you have sufficiently crosschecked the application. Once you are satisfied that the address history is accurate, you can then request the criminal background from a specific county or state.

## Fraud

Reviewing an application is more than reading the information and determining its accuracy. An application conveys an "attitude." An applicant may transpose numbers or omit information with the intent to mislead a property manager. If the property manager does not notice the "error" the applicant gets away with providing false information. If the property manager does notice it, the applicant simply responds that he has made a careless mistake and offers to correct it. It is at this point that the "attitude" may be displayed. Was it an honest mistake or an attempt to defraud the property owner?

You may never know for certain, but an unwillingness to immediately correct the error or a response like "you really don't need to know that stuff" would be a red flag. An "attitude" of uncooperativeness or arrogance at the application stage may indicate an equally unpleasant experience throughout the tenancy. Use caution, especially when dealing with the more subtle types of fraud.

Although you may think that more direct forms of fraud are easier to catch, they are not. The bolder forms of fraud include stolen or counterfeit forms of identification and often are used by smooth fast talking con artists that truly are professional cheats. As for stolen identification this can be the most difficult. In this case, the con artist is pretending to be a real person with a real job, credit cards and probably great credit history. How do you know he is who he says he is?

Our experience with stolen identities takes one or two forms. Either the perpetrator knows the individual he is impersonating extremely well, or he has stolen a wallet or purse. In the latter, the applicant generally has limited knowledge of the person he is impersonating. Believe it or not, they generally create an application that is a hybrid of truth and fiction. The application will have the name, address, social security number, and other vital statistics reflected by the stolen identification. The balance of the information, such as personal references, jobs and address history are usually consistent with the con artists real life! Check out references and the inconsistencies will be glaring.

As to the former example of fraud, it may be the most difficult to detect. At [Rent Recovery Service](#), we have seen countless examples of adult children using their parents' identification, ex-friends stealing identities from one another, and occasionally parents stealing the identity of their minor children.

In the first two examples, a lying applicant may know everything about the person he is impersonating. Employment, address history, and bank account numbers are often verified or legitimate when crosschecked against the other vital statistics provided. The differences may be as subtle as a "Jr." or "Sr." designation that is omitted on an application but is displayed on a driver's license. Carefully review the date of birth on a drivers' license and application with how old your applicant appears. If he claims to be born in 1950 but appears to be in his mid twenties - **wake up!**

If you verify the bank account has been open for 15 years (see bank account verification) or the employer verifies he is a long-term career employee eligible for retirement - **wake up!** You would be surprised how frequently the need to fill a vacancy clouds the thinking of the many property managers.

Lastly, it is worth mentioning that lately we have seen some fraudulent applicants using the name and social security number of a minor child, often a baby. This has been a less frequent type of fraud but seems to be a growing concern lately. The parent, abusing the child's identity assumes a clean credit and address history is better than his lifetime of delinquency. Unfortunately, some property managers have been duped. They pull a resident screening report and see it is effectively blank and assume no information is good information.

## Social Security Index of Valid Numbers

The first three numbers of a social security number indicates the state in which that number was assigned. Typically, most people obtain their social security card from the state they live in. Use this chart as a quick reference guide to help determine the legitimacy of the number and verify address history of the prospective resident.

001-003	New Hampshire
004-007	Maine
008-009	Vermont
010-034	Massachusetts
035-039	Rhode Island
040-049	Connecticut
050-134	New York
135-158	New Jersey
159-211	Pennsylvania
212-220	Maryland
221-222	Delaware
223-231	Virginia
232-236	West Virginia
237-246	North Carolina
247-251	South Carolina
252-260	Georgia
261-267	Florida
268-302	Ohio
303-317	Indiana
318-361	Illinois
362-386	Michigan
387-399	Wisconsin
400-407	Kentucky
408-415	Tennessee
416-424	Alabama
425-428	Mississippi
429-432	Arkansas
433-439	Louisiana
440-448	Oklahoma
449-467	Texas
468-477	Minnesota
478-485	Iowa
486-500	Missouri
501-502	North Dakota

**States that may use the SSN as a driver license number**

Arizona	Massachusetts
Arkansas	Mississippi
District of Columbia	Montana
Georgia	Nevada
Hawaii	North Dakota (after June 88')
Idaho	Oklahoma
Indiana	South Dakota
Iowa	Virginia
Kentucky	

**States that have part of the DOB within the driver license number**

**Connecticut:** Nine-digit number. The first two digits indicate month of birth.

**Florida:** The second to last set of numbers give you the year and month of birth.

**Illinois:** Either 11 or 12 digits. The last set of digits gives you the month and year of birth.

**Maryland:** 12 digits. The last set of digits gives you the month and year of birth.

**Michigan:** Uses a soundex system with the last three digits used as a code for the month and day of birth.

**Missouri:** 15 digits. Digits 4-15: Coded for the first name, middle initial, month and day of birth, sex.

**Nevada:** Last two digits are year of birth.

**New Hampshire:** Second to last set of four digits gives you the year and month of birth.

**New Jersey:** 15 characters. Last 5 digits gives you month, year of birth, color of eyes.

**New York:** Last section of digits gives you month, day and year of birth.

**South Dakota:** Last section of digits gives you month and year of birth.

**Washington:** Year of birth encoded by subtracting 100.

**Wisconsin:** Cut off the last two digits. The next five give you year, month and day of birth in that order

## Photo Identity Documents for Non-U.S. Citizens

*The following U. S. Immigration and Naturalization Service documents provide photo and fingerprint identity of the Non-U.S. Citizen. Each card contains a card number specific to the individual.*

**Form I-551 Permanent Resident Card (also known as Alien Registration Card)**

**Form I-688 Temporary Resident Card (provides an Expiration Date)**

**Form I-688A Employment Authorization Card (provides an Expiration Date)**

# Overview

- Do's and Don'ts For Screening Residents in Today's New World
- Is Credit History Alone Sufficient in Making the Decision?
- Fair Credit Reporting Act  
What Property Managers and Owners Should Know
- Verifying an Applicants' Identity
- Useful Contacts and Websites

- o INS Identifications

DO make photocopies of identification documents. It is legal to keep a copy of the photo ID with the application or resident file. This has been a big topic in the past, however leading experts within the Multi-Family Housing Industry have set forth guidelines approving this practice.

DO ask all applicants if they have a legal right to be in the United States. Add this question to your rental application.

DO set specific guidelines when leasing to students. Require original school documentation of the student's enrollment for the semester.

DO send an adverse action letter (denial letter) each and every time an applicant has been rejected or when special stipulations have been set in order for the applicant to move in. The Federal Trade Commission (FTC) has ruled that all "landlords" must send adverse action letters when an applicant has been asked to meet additional requirements (increased security deposit, co-signor) due to information obtained through a consumers report. Keep a copy of it with their file.

If the applicant is denied due to failing any part of the *identity document screening*, consider delaying the actual rejection until law enforcement authorities have been contacted.

DO remember that the key to successful resident screening is CONSISTENCY.

DO educate your entire TEAM on the importance of these issues. We all assume responsibility in one way or another for helping to protect our country from the on going threat of terrorism.

## **Guidance on Screening Related to Non Non-Resident Status and Terrorist Activities**

***Robin Hein, Esq. , Fowler, Hein, Cheatwood, Passino and Williams, P.A.***

### ***Prepared for the Georgia and Atlanta Apartment Associations 2002***

This guidance memo will follow-up the recent alert issued by the FBI Joint Terrorism Task Force that specifically refers to use of apartments for terrorist activities. This memo makes suggestions on how your company can set policies to help deal with terrorism in a lawful and non-discriminatory manner.

The Federal and Georgia Fair Housing Acts prohibit discrimination because of national origin, race, and religion. The fair housing acts do not specifically state that it is illegal to rent to someone if they are not a U.S. citizen. In fact, the U.S. Department of Housing and Urban Development (HUD) has adopted a federal regulation excluding nonresidents of the U.S. from public housing. Tax Credit properties have a similar requirement that the applicant be a U.S. citizen.

### ***Screening Rental Applicants.***

You cannot refuse to rent to someone SOLELY because they are from another country and not a U.S. citizen (unless you manage public housing or a tax credit property). It would be improper to refuse to rent to someone simply because they are of Middle Eastern descent or from Afghanistan. However, you can ask the applicant to produce proof of their legal right to be in the U.S.

The fair housing laws permit management to impose reasonable rental qualifications when granting or denying occupancy in the apartment community. Therefore, you may ask the rental applicant whether or not they have a legal right to be in U.S. One way of doing this is to include such a provision in your existing rental application or add a supplemental application form that asks:

***“Do you have a legal right to be in the United States?***

***\_ Yes, I am a U.S. Citizen; or***

***\_ Yes, I have a valid documentation from the U.S. Department of Immigration and***

***Naturalization (INS) that allows me to be in the country; or***

***\_ No.”***

You may ask all applicants for proof of their right to be in the country either by producing a document that demonstrates U.S. citizenship or a valid visa entry according

# Resident Selection Guidelines

## EXAMPLE FORM

**INCOME** - Total monthly household gross income (before taxes) must be at least three times the amount of the monthly apartment rent. You will be required to provide written proof from your employer to support the amount of income you claim on the rental application. If such proof is not available, we (the management) may accept as proof the pay stubs for at least six consecutive months of employment, Federal Income Tax Returns from prior year(s), and/or other proof deemed acceptable by the Property Manager. A guarantor will not be accepted as a source of income whether supplemental or primary.

**EMPLOYMENT** - Applicants must provide proof of current employment. If you have changed employment in the past six months, you also will need to show a minimum of six consecutive months of verifiable employment with one employer in the past 12 months. Length of employment must be verified by either supervisory personnel or by the Human Resources Department of your current and past employers.

**SELF-EMPLOYMENT / RETIREMENT** - If you are self-employed or retired, you must provide proof of income and/or your ability to pay rent for the term of the lease by furnishing copies of federal income tax returns filed for the past two years, a current certified financial statement, and/or photocopies of your three most recent bank statements.

**CREDIT HISTORY** - An extensive, negative credit history is grounds for the denial of application. Negative credit history includes but is not limited to any of the following:

- any judgment not remedied and/or any foreclosure of real estate not included in bankruptcy;
- more than two credit or installment accounts that have been past due for more than 90 days within the past 12 months;
- more than two accounts that are currently in collection; any open collection account from a utility, telephone service, or cable company;
- any repossession of material or personal property that is not being repaid, except when part of a bankruptcy, separation, or divorce;
- any suit pending or not remedied;
- any personal bankruptcy within the past five years that has not been discharged;
- more than two NSF (insufficient funds) checks within the past 12-month period.

The absence of a credit file does not affect an applicant adversely; however, if you have no credit rating, you will be required to pay an additional security deposit of one month's rent in addition to the standard security deposit in effect for your requested apartment size at the time you make application. You must also meet the other criteria listed in this document.

**RENTAL HISTORY** - Any negative rental history is grounds for the denial of an application. Negative rental history includes but is not limited to the following:

- Any breach of a lease agreement unless you can provide documentation of proven

## Credit Report Review

Listed below are the guidelines, which have been established for all "Apartment Name". These guidelines are effective immediately and are to be implemented as stated below.

### **The Applicant Will Be Denied If:**

- ❖ Bankruptcy filed in the last 12 months
- ❖ Any eviction, foreclosure, forcible detainer ever filed
- ❖ Any unpaid collections exceeding \$1000.00 (excluding medical) in the last 24 months
- ❖ Charged off accounts (totaling more than \$500.00) not paid or released in the last 12 months excluding school loans

### **Supervisor Approval & Full Deposit Required If:**

- ❖ Score below 600
- ❖ No score or records available
- ❖ Any judgment, tax lien, garnishment or repossession in the last 24 months not dismissed, satisfied or released
- ❖ Any unpaid collections exceeding \$250.00 but under \$1000.00 require acceptable proof of payment or payment arrangements. **ALL UTILITY** collections must be paid in full
- ❖ Debt to income ratio exceeds 35%
- ❖ 2 or more trades rated 3 (60 days late)

All approvals will be contingent on the results of a criminal history background check as well as employment and residential history verifications.

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### **Criminal Denials**

- ❖ Sexual Crimes
- ❖ Violent Crimes
- ❖ Drug Offenses
- ❖ Domestic Violence Offenses within the last 5 years

The following list is a "generic" description of products and services available to the Multi-Family Housing Industry. A variety of vendors have developed similar products and services as those listed below to help improve the resident screening process.

## Evictions and Resident Data

Experts within law enforcement agencies have helped to define residential patterns of known terrorist for the apartment industry. Sudden or abrupt moves, short-term leases and "gaps" between residences have all been common characteristics noted. Resident Data and Eviction Filings obtained by a consumer-reporting agency are the keys to uncovering some of that missing information. Because this type of information does not appear on credit reports it can play a crucial role in thoroughly screening prospective residents. Past rental history is also essential in predicting an applicants payment tendencies and potential for future eviction.

## Criminal Records

A criminal report can help to identify applicants who may cause harm to your property, residents or even your employees. Incorporating criminal reports into your screening process may be the best defense you have in safeguarding your community. Understanding the different types of criminal *records* is important when deciding which criminal *report* will best suit your communities' needs.

- Statewide or County
- Multi-State
- Arrests or Convictions
- Felony Crimes
- Misdemeanor and Traffic Crimes

# The Fair Credit Reporting Act (FCRA)

Using Consumer Reports

Adverse Action

What Property Management  
Professionals Need to Know

A Summary of Your Rights Under  
The Fair Credit Reporting Act

## The Adverse Action Notice

When an adverse action is taken that is based solely or partly on information in a consumer report, the FCRA requires you to provide a notice of the adverse action to the consumer. The notice must include:

- the names, address and telephone number of the CRA that supplied the consumer report, including a toll-free number for CRAs that maintain files nationwide;
- a statement that the CRA that supplied the report did not make the decision to take the adverse action and cannot give the specific reasons for it; and
- a notice of the individual's right to dispute the accuracy or completeness of any information the CRA furnished, and the consumer's right to a free report from the CRA upon request within 60 days.

Disclosure of this information is important because some consumer reports contain errors.

The adverse action notice must name the CRA that provided the report to the owner, even if the information came from another CRA. For example, a report from XYZ ResidentScreen includes a credit report from ABC Credit Bureau. The credit report includes negative information that prompts the owner to turn down the rental application. The adverse action notice should name XYZ ResidentScreen as the CRA because XYZ ResidentScreen actually provided the report to the owner. The notice also can explain that XYZ ResidentScreen got the credit information from ABC Credit Bureau, but that is not required under the FCRA.

While oral adverse action notices are allowed, written notices provide proof of FCRA compliance.

### Take the Case of...

1. A owner who orders a consumer report from a CRA. Information contained in the report leads to further investigation of the applicant. The rental application is denied because of that investigation.

Since information in the report prompted the adverse action in this case, an adverse action notice must be sent to the consumer.

2. An applicant with an unfavorable credit history, like past-due credit accounts, who is denied an apartment. Although the credit history was considered in the decision, the applicant's poor reputation as a resident in his current location played a more important role.

The applicant is entitled to an adverse action notice because the credit report played a part, however minor, in the denial.

3. A person with an unfavorable credit history, like a bankruptcy, but no other negative indicators, who applies for an apartment. Rather than deny the application, the owner offers to rent the apartment, requiring a security deposit that is double the normal amount.

The applicant is entitled to an adverse action notice because the credit report influenced the owner's decision to require a higher security deposit from the applicant.

# Verifying an Applicants Identity

Unfortunately there are no easy answers. One solution is to try and familiarize yourself with the most common types of photo Ids. The following are various resources available to help you do so.

[www.ins.gov/graphics/lawregs/handbook/hnmanual.htm](http://www.ins.gov/graphics/lawregs/handbook/hnmanual.htm)

[www.fels.org/insforms/insdocs.htm](http://www.fels.org/insforms/insdocs.htm)

I.D. Checking Guide (U.S.A. & Canada) \$19.95 plus shipping

International I.D. Checking Guide \$29.95 plus shipping  
Available for order by calling (650) 369-4849

- Always verify and photo copy the identification applicants provide.
- Insist on at least one form of I.D. with a photo.
- Require original documents to prove identity.
- With the assistance of your companies attorney and Fair Housing advocates establish guidelines regarding what is "reasonable acceptable proof". Also set guidelines for the minimum amount of identification required.

## A Summary of Your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) is designed to promote accuracy, fairness, and privacy of information in the files of every "consumer reporting agency" (CRA). Most CRAs are credit bureaus that gather and sell information about you -- such as if you pay your bills on time or have filed bankruptcy -- to creditors, employers, owners, and other businesses. You can find the complete text of the FCRA, 15 U.S.C. §§1681-1681u, at the Federal Trade Commission's web site (<http://www.ftc.gov>). The FCRA gives you specific rights, as outlined below. You may have additional rights under state law. You may contact a state or local consumer protection agency or a state attorney general to learn those rights.

- **You must be told if information in your file has been used against you.** Anyone who uses information from a CRA to take action against you -- such as denying an application for credit, insurance, or employment -- must tell you, and give you the name, address, and phone number of the CRA that provided the consumer report.
- **You can find out what is in your file.** At your request, a CRA must give you the information in your file, and a list of everyone who has requested it recently. There is no charge for the report if a person has taken action against you because of information supplied by the CRA, if you request the report within 60 days of receiving notice of the action. You are also entitled to one free report every twelve months upon request if you certify that (1) you are unemployed and plan to seek employment within 60 days, (2) you are on welfare, or (3) your report is inaccurate due to fraud. Otherwise, a CRA may charge you up to nine dollars.
- **You can dispute inaccurate information with the CRA.** If you tell a CRA that your file contains inaccurate information, the CRA must investigate the items (usually within 30 days) by presenting to its information source all relevant evidence you submit, unless your dispute is frivolous. The source must review your evidence and report its findings to the CRA. (The source also must advise national CRAs -- to which it has provided the data -- of any error). The CRA must give you a written report of the investigation, and a copy of your report if the investigation results in any change. If the CRA's investigation does not resolve the dispute, you may add a brief statement to your file. The CRA must normally include a summary of your statement in future reports. If an item is deleted or a dispute statement is filed, you may ask that anyone who has recently received your report be notified of the change.
- **Inaccurate information must be corrected or deleted.** A CRA must remove or correct inaccurate or unverified information from its files, usually within 30 days after you dispute it. **However, the CRA is not required to remove accurate data from your file unless it is outdated (as described below) or cannot be verified.** If your dispute results in any change to your report, the CRA cannot reinsert into your file a disputed item unless the information source verifies its accuracy and completeness. In addition, the CRA must give you a written notice telling you it has reinserted the item. The notice must include the name, address, and phone number of the information source.

Applicant's Name: \_\_\_\_\_

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

Applicant's Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Thank you for submitting your rental application to \_\_\_\_\_. After a thorough review of the information provided, we find that we are unable to accept your rental application:

If you would like a statement of specific reasons why we took the action described above, please contact us as indicated below within 60 days of the date of this letter. We will provide you with the statement of reasons within 30 days after receiving your request.

Owner/Property Manager's Name \_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

Phone #: \_\_\_\_\_

Our decision was based in whole or in part on information obtained in a report from the consumer reporting agency listed below (an "x" has been placed in the box next to the name of the agency(ies) from which we obtained the information). You have a right under the Fair Credit Reporting Act to know the information contained in your credit file at the consumer reporting agency. The reporting agency played no part in our decision and is unable to supply specific reasons why we have taken the action described above. You also have a right to a free copy of your report from the reporting agency, if you request it no later than 60 days after you receive this notice. In addition, if you find that any information contained in the report you receive is inaccurate or incomplete, you have the right to dispute the matter with the reporting agency.

For a free copy of your credit report or to dispute matters on your permanent credit file, please contact the following consumer reporting agencies:

Experian  
1-800-422-4879  
P.O. Box 9530  
Allen, TX 75013

TransUnion  
1-800-632-1765  
P.O. Box 1370  
Buffalo, NY 14231

Equifax  
1-800-685-1111  
P.O. Box 740250  
Atlanta, GA 30374

For a free copy of AmRent rental history and criminal record information or to dispute either of these two types of information, please contact:

AmRent, Inc.  
1-888-898-6196  
P O Box 605  
Columbus, OH 43216

If you have any questions regarding this notice, you should contact:

Owner/Property Manager's Name: \_\_\_\_\_

Owner/Property Manager's Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

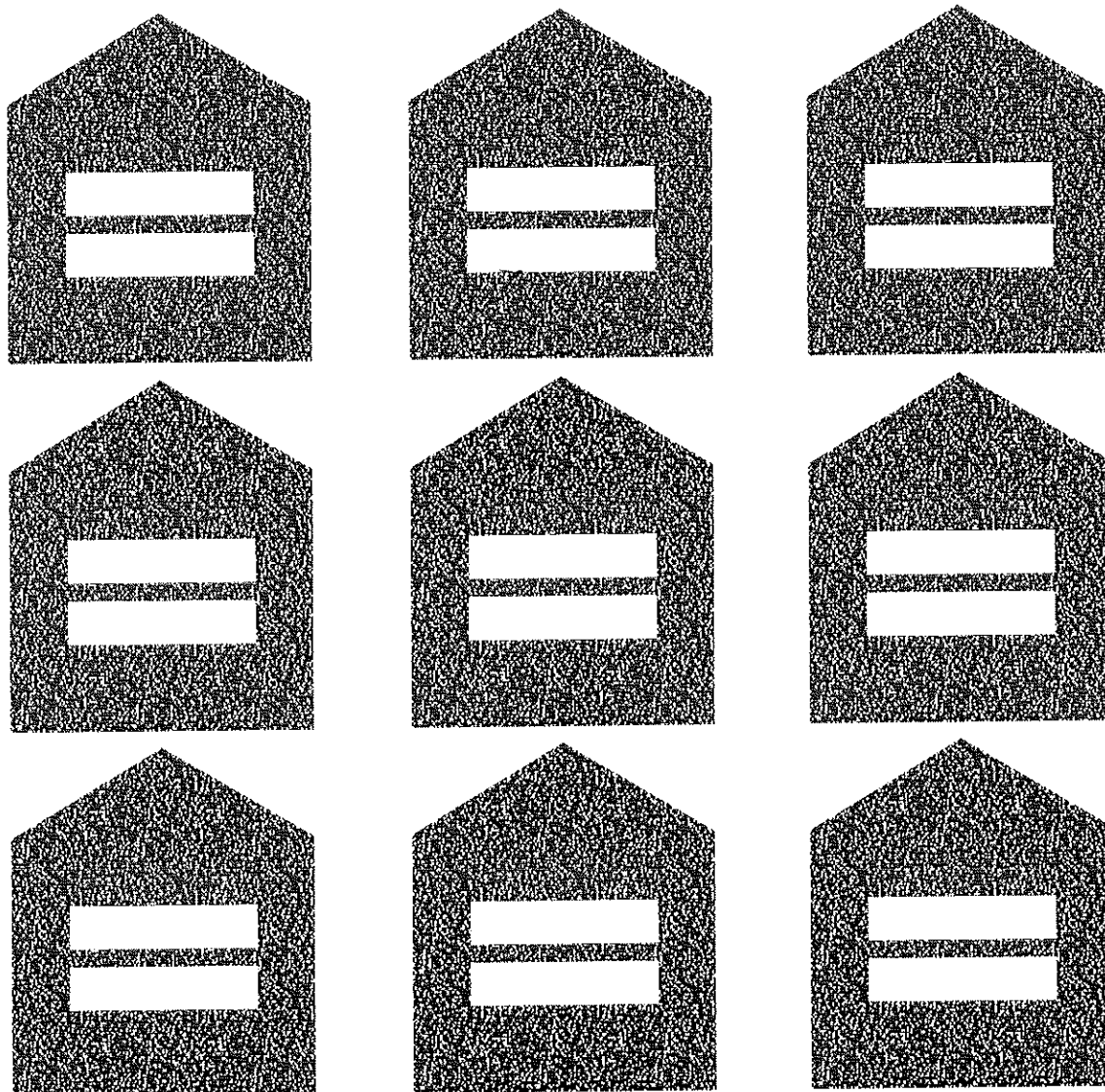
Owner/Property Manager's Telephone Number: \_\_\_\_\_



# Fair Housing

Equal Opportunity for All

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Please visit our website: [www.hud.gov/fairhousing](http://www.hud.gov/fairhousing)

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## Fair Housing - Equal Opportunity for All

The rich diversity of our people, coupled with the unity of spirit upon which this nation was founded, is America's true strength. We are a nation that celebrates equality of opportunity, which makes it all the more disturbing when new immigrants, minorities, families with children, and people with disabilities are denied housing because of unfair housing discrimination.

The Department of Housing and Urban Development enforces the Fair Housing Act and the other federal laws that prohibit discrimination and the intimidation of people in their homes. These laws cover virtually all housing in the United States - private homes, apartment buildings, and condominium developments - and nearly all housing transactions, including the rental and sale of housing and the provision of mortgage loans.

Equal access to rental housing and homeownership opportunities is the cornerstone of this nation's federal housing policy. Landlords who refuse to rent or sell homes to people based on race, color, national origin, religion, sex, familial status, or disability are violating federal law, and HUD will vigorously pursue them.

Housing discrimination is not only illegal, it contradicts in every way the principles of freedom and opportunity we treasure as Americans. The Department of Housing and Urban Development is committed to ensuring that for everyone seeking a place to live, *all* housing is Fair Housing.



Mel Martinez  
Secretary

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U.S. Department of Housing and Urban Development  
Secretary Mel Martinez  
451 7th Street, S.W.  
Washington, DC 20410-2000

## The Fair Housing Act

The Fair Housing Act prohibits discrimination in housing because of:

- Race or color
  - National origin
  - Religion
  - Sex
  - Familial status (including children under the age of 18 living with parents or legal custodians; pregnant women and people securing custody of children under 18)
  - Handicap (Disability)
- 

## What Housing Is Covered?

The Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker and housing operated by organizations and private clubs that limit occupancy to members.

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## What Is Prohibited?

**In the Sale and Rental of Housing:** No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap (disability):

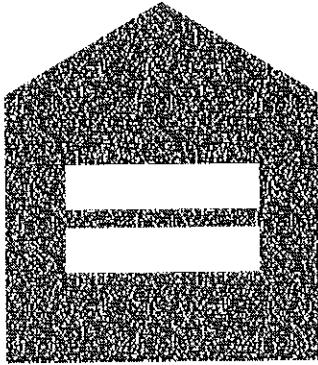
- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale or rental
- For profit, persuade owners to sell or rent (blockbusting) or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

**In Mortgage Lending:** No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap (disability):

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan or
- Set different terms or conditions for purchasing a loan

**In Addition:** It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right
  - Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status or handicap (disability). This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.
- 



## **Additional Protection If You Have A Disability**

If you or someone associated with you:

- Have a physical or mental disability (including hearing, mobility and visual impairments, cancer, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities
- Have a record of such a disability or
- Are regarded as having such a disability your landlord may not:
- Refuse to let you make reasonable modifications to your dwelling or common use areas, at your expense, if necessary for the disabled person to use the housing. (Where reasonable, the landlord may permit changes only if you agree to restore the property to its original condition when you move.)
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing

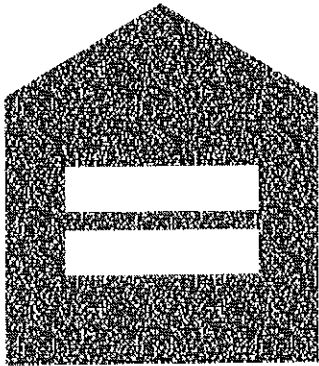
**Example:** A building with a "no pets" policy must allow a visually impaired tenant to keep a guide dog.

**Example:** An apartment complex that offers tenants ample, unassigned parking must honor a request from a mobility-impaired tenant for a reserved space near her apartment if necessary to assure that she can have access to her apartment.

However, housing need not be made available to a person who is a direct threat to the health or safety of others or who currently uses illegal drugs.

**Requirements for New Buildings:** In buildings that are ready for first occupancy **after** March 13, 1991, and have an elevator or four or more units:

- Public and common areas must be accessible to persons with disabilities
- Doors and hallways must be wide enough for wheelchairs
- All units must have:
  - An accessible route into and through the unit
  - Accessible light switches, electrical outlets, thermostats and other environmental controls
  - Reinforced bathroom walls to allow later installation of grab bars and
  - Kitchen and bathrooms that can be used by people in wheelchairs



If a building with four or more units has no elevator and will be ready for first occupancy after March 13, 1991, these standards apply to ground floor units.

These requirements for new buildings do not replace any more stringent standards in State or local law.

---

## Housing Opportunities for Families

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under 18 live with:

- A parent
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

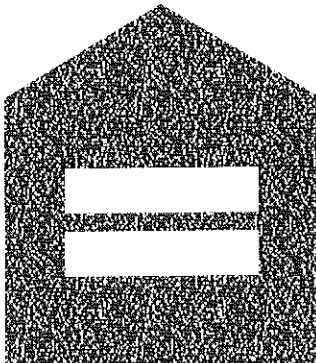
Familial status protection also applies to pregnant women and anyone securing legal custody of a child under 18.

**Exemption:** Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a Federal, State or local government program or
- It is occupied solely by persons who are 62 or older or
- It houses at least one person who is 55 or older in at least 80 percent of the occupied units, and adheres to a policy that demonstrates an intent to house persons who are 55 or older.

A transition period permits residents on or before September 13, 1988 to continue living in the housing, regardless of their age, without interfering with the exemption.

---



## If You Think Your Rights Have Been Violated

HUD is ready to help with any problem of housing discrimination. If you think your rights have been violated, you may write a letter or telephone the HUD office nearest you. You have one year after an alleged violation to file a complaint with HUD, but you should file it as soon as possible.

### What to Tell HUD

- Your name and address
- The name and address of the person your complaint is against (the respondent)
- The address or other identification of the housing involved
- A short description of the alleged violation (the event that caused you to believe your rights were violated)
- The date(s) of the alleged violation

**Where to Write or Call:** Send a letter to the fair housing office nearest you, or if you wish, you may call that office directly. (The direct dial and TTY numbers for the deaf/hard of hearing users are not toll free.)

*For Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont:*

### **NEW ENGLAND OFFICE** **(*Marcella\_Brown@hud.gov*)**

Fair Housing Enforcement Center  
U.S. Department of Housing  
and Urban Development  
Thomas P. O'Neill, Jr. Federal Building  
10 Causeway Street, Room 321  
Boston, MA 02222-1092  
Telephone (617) 994-8300 or 1-800-827-5005  
Fax (617) 565-7313 • TTY (617) 565-5453

*For New Jersey and New York:*

### **NEW YORK/NEW JERSEY OFFICE** **(*Stanley\_Seidenfeld@hud.gov*)**

Fair Housing Enforcement Center  
U.S. Department of Housing  
and Urban Development  
26 Federal Plaza, Room 3532  
New York, NY 10278-0068  
Telephone (212) 264-1290 or 1-800-496-4294  
Fax (212) 264-9829 • TTY (212) 264-0927

*For Delaware, District of Columbia,  
Maryland,  
Pennsylvania, Virginia, and West Virginia:*

**MID-ATLANTIC OFFICE**  
**(Wanda\_Nieves@hud.gov)**

Fair Housing Enforcement Center  
U.S. Department of Housing  
and Urban Development  
The Wanamaker Building  
100 Penn Square East  
Philadelphia, PA 19107-9344  
Telephone (215) 656-0662 or 1-888-799-2085  
Fax (215) 656-3419 • TTY (215) 656-3450

*For Alabama, the Caribbean, Florida, Georgia,  
Kentucky, Mississippi, North Carolina,  
South Carolina, and Tennessee:*

**SOUTHEAST/CARIBBEAN OFFICE**  
**(Gregory\_King@hud.gov)**

Fair Housing Enforcement Center  
U.S. Department of Housing  
and Urban Development  
Five Points Plaza  
40 Marietta Street, 16th Floor  
Atlanta, GA 30303-2808  
Telephone (404) 331-5140 or 1-800-440-8091  
Fax (404) 331-1021 • TTY (404) 730-2654

*For Illinois, Indiana, Michigan, Minnesota,  
Ohio, and Wisconsin:*

**MIDWEST OFFICE**  
**(Barbara\_Knox@hud.gov)**

Fair Housing Enforcement Center  
U.S. Department of Housing  
and Urban Development  
Ralph H. Metcalfe Federal Building  
77 West Jackson Boulevard, Room 2101  
Chicago, IL 60604-3507  
Telephone (312) 353-6236 or 1-800-765-9372  
Fax (312) 886-2837 • TTY (312) 353-7143

*For Arkansas, Louisiana, New Mexico,  
Oklahoma, and Texas:*

**SOUTHWEST OFFICE**

Fair Housing Enforcement Center  
U.S. Department of Housing  
and Urban Development  
801 North Cherry, 27th Floor  
Fort Worth, TX 76102  
Telephone (817) 978-5900 or 1-888-560-8913  
Fax (817) 978-5876 or 5851 • TTY (817) 978-5595

*For Iowa, Kansas, Missouri and Nebraska:*

**GREAT PLAINS OFFICE**

*(Robbie\_Herndon@hud.gov)*

Fair Housing Enforcement Center  
U.S. Department of Housing  
and Urban Development  
Gateway Tower II  
400 State Avenue, Room 200, 4th Floor  
Kansas City, KS 66101-2406  
Telephone (913) 551-6958 or 1-800-743-5323  
Fax (913) 551-6856 • TTY (913) 551-6972

*For Colorado, Montana, North Dakota,  
South Dakota, Utah, and Wyoming:*

**ROCKY MOUNTAINS OFFICE**

Fair Housing Enforcement Center  
U.S. Department of Housing  
and Urban Development  
633 17th Street  
Denver, CO 80202-3607  
Telephone (303) 672-5437 or 1-800-877-7353  
Fax (303) 672-5026 • TTY (303) 672-5248

*For Arizona, California, Hawaii, and Nevada:*

**PACIFIC/HAWAII OFFICE**  
**(Charles\_Hauptman@hud.gov)**

Fair Housing Enforcement Center  
U.S. Department of Housing  
and Urban Development  
Phillip Burton Federal Building  
and U.S. Courthouse  
450 Golden Gate Avenue  
San Francisco, CA 94102-3448  
Telephone (415) 436-8400 or 1-800-347-3739  
Fax (415) 436-8537 • TTY (415) 436-6594

*For Alaska, Idaho, Oregon, and Washington:*

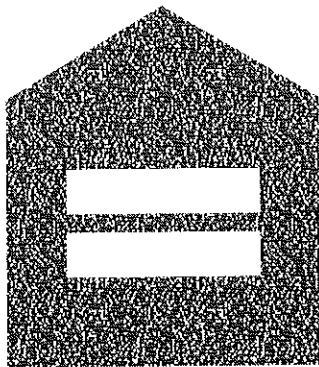
**NORTHWEST/ALASKA OFFICE**  
**(Judith\_Keeler@hud.gov)**

Fair Housing Enforcement Center  
U.S. Department of Housing  
and Urban Development  
Seattle Federal Office Building  
909 First Avenue, Room 205  
Seattle, WA 98104-1000  
Telephone (206) 220-5170 or 1-800-877-0246  
Fax (206) 220-5447 • TTY (206) 220-5185

*If after contacting the local office nearest you,  
you still have questions - you may contact HUD  
further at:*

U.S. Department of Housing  
and Urban Development  
Office of Fair Housing and Equal Opportunity  
451 7th Street, S.W., Room 5204  
Washington, DC 20410-2000  
Telephone (202) 708-0836 or 1-800-669-9777  
Fax (202) 708-1425 • TTY 1-800-927-9275

## What Happens When You File A Complaint?



**If You Are Disabled:** HUD also provides:

- A TTY phone for the deaf/hard of hearing users; see above list for the HUD office *nearest* you.
  - Interpreters
  - Tapes and braille materials
  - Assistance in reading and completing forms
- 

HUD will notify you when it receives your complaint. Normally, HUD also will:

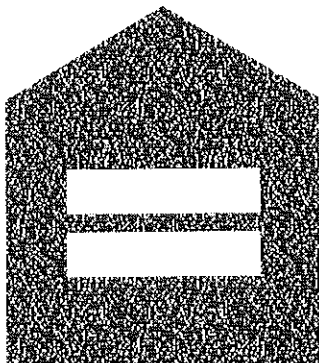
- Notify the alleged violator of your complaint and permit that person to submit an answer
- Investigate your complaint and determine whether there is reasonable cause to believe the Fair Housing Act has been violated
- Notify you if it cannot complete an investigation within 100 days of receiving your complaint

**Conciliation:** HUD will try to reach an agreement with the person your complaint is against (the respondent). A conciliation agreement must protect both you and the public interest. If an agreement is signed, HUD will take no further action on your complaint. However, if HUD has reasonable cause to believe that a conciliation agreement is breached, HUD will recommend that the Attorney General file suit.

**Complaint Referrals:** If HUD has determined that your State or local agency has the same fair housing powers as HUD, HUD will refer your complaint to that agency for investigation and notify you of the referral. That agency must begin work on your complaint within 30 days or HUD may take it back.

---

**Does the  
U.S. Department  
of Justice  
Play A Role?**



If you need immediate help to stop a serious problem that is being caused by a Fair Housing Act violation, HUD may be able to assist you as soon as you file a complaint. HUD may authorize the United States Attorney General to go to court to seek temporary or preliminary relief, pending the outcome of your complaint, if:

- Irreparable harm is likely to occur without HUD's intervention
- There is substantial evidence that a violation of the Fair Housing Act occurred

**Example:** A builder agrees to sell a house but, after learning the buyer is black, fails to keep the agreement. The buyer files a complaint with HUD. HUD may authorize the Attorney General to go to court to prevent a sale to any other buyer until HUD investigates the complaint.

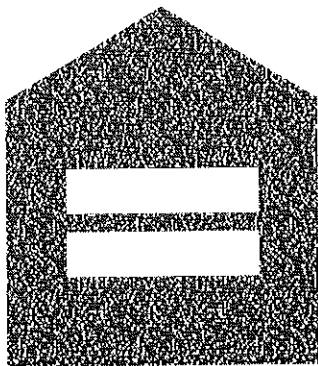
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## What Happens After A Complaint Investigation?

If, after investigating your complaint, HUD finds reasonable cause to believe that discrimination occurred, it will inform you. Your case will be heard in an administrative hearing within 120 days, unless you or the respondent want the case to be heard in Federal district court. Either way, there is no cost to you.

**The Administrative Hearing:** If your case goes to an administrative hearing HUD attorneys will litigate the case on your behalf. You may intervene in the case and be represented by your own attorney if you wish. An Administrative Law Judge (ALJ) will consider evidence from you and the respondent. If the ALJ decides that discrimination occurred, the respondent can be ordered:

- To compensate you for actual damages, including humiliation, pain and suffering.
- To provide injunctive or other equitable relief, for example, to make the housing available to you.
- To pay the Federal Government a civil penalty to vindicate the public interest. The maximum penalties are \$11,000 for a first violation, \$27,500 for a previous violation within the preceding five year period and \$55,000 for two or more previous violations within the preceding seven years.
- To pay reasonable attorney's fees and costs.



**Federal District Court:** If you or the respondent choose to have your case decided in Federal District Court, the Attorney General will file a suit and litigate it on your behalf. Like the ALJ, the District Court can order relief, and award actual damages, attorney's fees and costs. In addition, the court can award punitive damages.

---

## In Addition

**You May File Suit:** You may file suit, at your expense, in Federal District Court or State Court within two years of an alleged violation. If you cannot afford an attorney, the court may appoint one for you. You may bring suit even after filing a complaint, if you have not signed a conciliation agreement and an Administrative Law Judge has not started a hearing. A court may award actual and punitive damages and attorney's fees and costs.

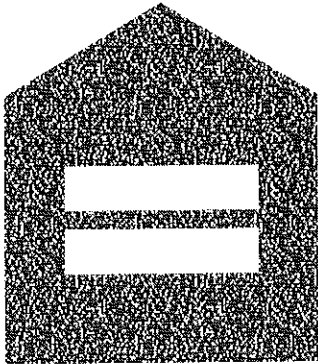
### **Other Tools to Combat Housing Discrimination:**

- If there is noncompliance with the order of an Administrative Law Judge, HUD may seek temporary relief, enforcement of the order or a restraining order in a United States Court of Appeals.
- The Attorney General may file a suit in Federal District Court if there is reasonable cause to believe a pattern or practice of housing discrimination is occurring.

### **For Further Information:**

The purpose of this brochure is to summarize your right to fair housing. The Fair Housing Act and HUD's regulations contain more detail and technical information. If you need a copy of the law or regulations, contact the HUD fair housing office nearest you. See the list of Fair Housing Enforcement Centers on page 6-9.

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U.S. Department of Housing  
and Urban Development  
Room 5204  
Washington, D.C. 20410-2000

HUD-1686-FHEO  
January 2002

