

Discrimination Against Deaf and Hard-of-Hearing Persons in Rental Housing in Solano County

An Audit Report By

FAIR HOUSING OF MARIN

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FOREWORD

Discrimination in rental housing on the basis of disability is illegal under state and federal law. The purpose of this audit was to assess the extent to which people with hearing impairments experience discrimination or differential treatment in the initial stages of homeseeking process, based on their use of the IP relay system.

Those responsible for this report hope the results and recommendations contained herein will heighten awareness and encourage a cooperative effort by all segments of the communities in Solano County to eliminate differential treatment of persons by virtue of their disability.

The audit was carried out by Denise Bashline, Testing Coordinator at Fair Housing of Marin, under the supervision of Executive Director Caroline Peattie.

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DISCRIMINATION AGAINST DEAF AND HARD-OF-HEARING PERSONS IN SOLANO COUNTY

AUDIT REPORT

I. INTRODUCTION

This report presents results of an audit for disability discrimination against deaf and hard-of-hearing persons using an IP relay system to inquire about rental housing opportunities in Solano County in California. The audit took place between September 2014 and March 2015.

A. FAIR HOUSING OF MARIN

Fair Housing of Marin (FHOM) is a private nonprofit agency dedicated to assisting individuals experiencing housing discrimination and educating the community, including tenants, managers, property owners, and residents, as to their rights and responsibilities under federal and state fair housing laws.

B. LEGAL BACKGROUND

1. Federal Fair Housing Laws

Housing discrimination based on race, color, religion, national origin, sex/gender, disability, or familial status (the presence of children in the household) is illegal under Title VIII of the Civil Rights Act of 1968, as amended in 1988, commonly known as the Fair Housing Act (FHA).

The FHA as enacted by Congress in 1968 prohibited discrimination based on race, color, religion or national origin in the sale, rental or financing of housing. In 1974, Congress expanded the FHA to prohibit discrimination based on sex/gender. In 1988, Congress passed the Fair Housing Amendments Act (FHAA), which added families with children and persons with mental and physical disabilities to the categories of people protected from housing discrimination.

The FHAA specifically states that because of race, color, religion, sex, national origin, disability or familial status, it is illegal to:

- Refuse to sell or rent after the making of a bona fide offer, or refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling;
- Discriminate in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities;
- Make, print, or publish, or cause to be made, printed, or published, any notice, statement, or advertisement with respect to the sale or rental of a dwelling that indicates discrimination, preference, or limitation; or
- Represent that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact available.

2. California Fair Housing Laws

The two primary state fair housing laws are the Fair Employment and Housing Act (FEHA) and the Unruh Civil Rights Act. These laws incorporate the same protected classes of persons as federal law, and also prohibit discrimination based on marital status, sexual orientation, source of income, ancestry, and arbitrary factors such as age or occupation.

C. AUDIT BACKGROUND

Real estate transactions, including rentals, purchases, and obtaining mortgage loans and homeowner's property insurance, are often conducted in whole or part over the telephone. Over the past 20 years, FHOM has conducted multiple telephone audits in several Bay Area counties designed to measure the extent of discrimination in rental housing against members of protected classes. Historically, the results of these audits suggest that unlawful discrimination during phone contact continues to be pervasive.

1. Previous Disability Audits Conducted by FHOM

In 2013 and 2014, FHOM conducted deaf/hard-of-hearing audit testing in Marin and Sonoma counties. Results of this testing indicated discrimination against hearing impaired callers using an IP Relay telephone system: in 62% of calls, the deaf/hard-of-hearing tester received less preferential treatment than the non-disabled caller.

II. AUDIT GOALS AND METHODOLOGY

A. WHAT IS A FAIR HOUSING AUDIT?

A fair housing audit is a way to assess compliance or non-compliance with federal and state fair housing laws. It is a controlled measurement of the difference in quality, quantity, and content of information and services accorded to paired customers (testers) by housing providers. An audit differs from a complaint-based test in that it gives a broad overview of housing provider behavior in a given market during a certain time period. Public governmental bodies and private agencies throughout the country routinely conduct audits as an educational and enforcement tool.

B. AUDIT GOALS

1. To identify instances of differential treatment at available rental sites, including duplexes and larger multi-family complexes, thus indicating the extent to which people with hearing impairments face difficulty in securing rental housing in Solano County due to disability discrimination.
2. To conduct additional investigations at sites where results suggest that further investigation could yield stronger evidence of discrimination.
3. To bring minor violations to the attention of housing providers, in order to increase awareness of the potential consequences of engaging in discriminatory practices and prevent future transgressions.
4. To file enforcement proposals in cases with strong evidence of differential treatment.
5. To increase awareness by housing providers of the difficulties persons with hearing impairments experience in securing rental housing.
6. To make disabled homeseekers aware of discriminatory practices they may experience and the services provided by FHOM to secure housing rights.
7. To offer training to housing providers on fair housing laws and practices in order to forestall future discrimination.

C. GEOGRAPHIC SCOPE OF AUDIT

The audit included properties in the Solano County cities of Benicia, Fairfield, Suisun City, Vacaville, and Vallejo. These locations represent both the most densely populated cities in Solano County as well as more suburban communities with lower population densities. FHOM estimates that the 53 paired phone tests for this audit reached agents administering the rental of more than one thousand units in various apartment complexes.

D. AUDIT METHODOLOGY

1. Sampling Techniques

The audit coordinator selected appropriate properties to test within the target geographic areas from advertisements posted on Craigslist, a popular online listing service, and other internet sites.

2. Matched Pair Testing

a. Telephone tests involved pairs consisting of one deaf/hard-of-hearing (“protected”) tester, and one non-disabled (“control”) tester. Each tester was matched to his or her counterpart as closely as possible in age and gender.

b. The audit coordinator assigned profiles to each tester, with roughly equivalent rental credentials, except that the protected class (deaf/hard-of-hearing) testers were assigned slightly higher incomes and more stable employment and rental histories than their control (non-disabled) tester counterparts. Both profiles for each test pair were designed to satisfy typical rental eligibility requirements and to avoid any indication of difference in other protected class characteristics such as race, national origin, religion, or familial status. The audit coordinator instructed testers to express identical housing needs. For example, each member of a pair might have been instructed to ask for a one or two-bedroom apartment at the advertised complex.

3. Training of Testers

a. All testers received fair housing tester training, and specialized training in audit procedures.

b. Independent of Fair Housing of Marin, deaf/hard-of-hearing testers registered with

an Internet Protocol Relay Service (“IP Relay”). An IP Relay Service enables a person with a hearing impairment to use a computer and a live relay operator to communicate through the telephone system. IP Relay Services allow the user to print out a transcript of the conversation at the conclusion of the call.

4. Testing Procedure

- a. Each tester called an assigned telephone phone number during a designated time frame.
- b. The first tester of a pair called and hung up if he or she did not reach an agent. If the tester did not successfully connect with an agent, he or she called a second time, either later that day or the next day. The second tester of a pair called after the first tester had spoken with an agent.
- c. The audit coordinator instructed each tester to ask about several details of the available rental during each call in order to elicit similar information from the housing provider so that multiple points of comparison would exist between the two tests in each pair. Information requested by testers included the following:
 - Amount of rent and security deposit;
 - Amount of application or credit check fee;
 - General lease terms; and
 - Availability of any other units.
- d. For each call, testers completed a Tester Report Form documenting the information received regarding unit availability, rental terms and conditions, application process and qualifications. The protected tester submitted a printed transcript of the call with his or her report; the control tester wrote and submitted a narrative description of each telephone contact. Both testers also submitted written descriptions of any subsequent contact from the housing provider by phone or email.
- e. FHOM staff debriefed testers upon completion of each phone test and reviewed their written reports.

5. Test Analysis

- a. FHOM staff compared the two tester reports for each test to assess whether the testers received the same treatment and information from the housing provider.

Staff compared information in the following areas:

- i. Unit availability;
- ii. Rental terms and conditions (including amenities and special offers);
- iii. Screening and follow-up;
- iv. Information about applicant qualifications, eligibility, or rental criteria; and
- v. Comments, encouragement, and general treatment.

b. Tests with evidence of discriminatory statements or differential treatment disfavoring people with hearing impairments may form the basis of further investigations.

III. RESULTS

Between September 2014 and March 2015, FHOM conducted **53 tests** in Solano County. The tests fell into several broad groups: those showing no differential treatment or inconclusive outcomes, those revealing some differential treatment, and those evincing clear differential treatment.

“Clear differential treatment” means there was a demonstrable discrepancy in the amount, quality, or substance of the information received by the testers, to the disadvantage of the protected tester. “Clear differential treatment” refers to *statutory violations*, such as:

- Refusing to rent or negotiate;
- Making a false representation about availability;
- Offering different terms, conditions, privileges or services;
- Otherwise making housing unavailable; or
- Making discriminatory statements

“Some differential treatment” means there was a discrepancy in the information received by each tester. The discrepancies favored the control tester, but not to the clear detriment of the protected tester. In some cases, the differences involved factors characterized as less significant than those counted in the “clear differential treatment” category. “Some differential treatment” includes *statutory violations that do not materially affect the housing transaction* and other less significant types of differential treatment, such as:

- Offering information that varies in quality;
- Encouraging a caller to apply; and
- Following up with a caller after his or her initial inquiry.

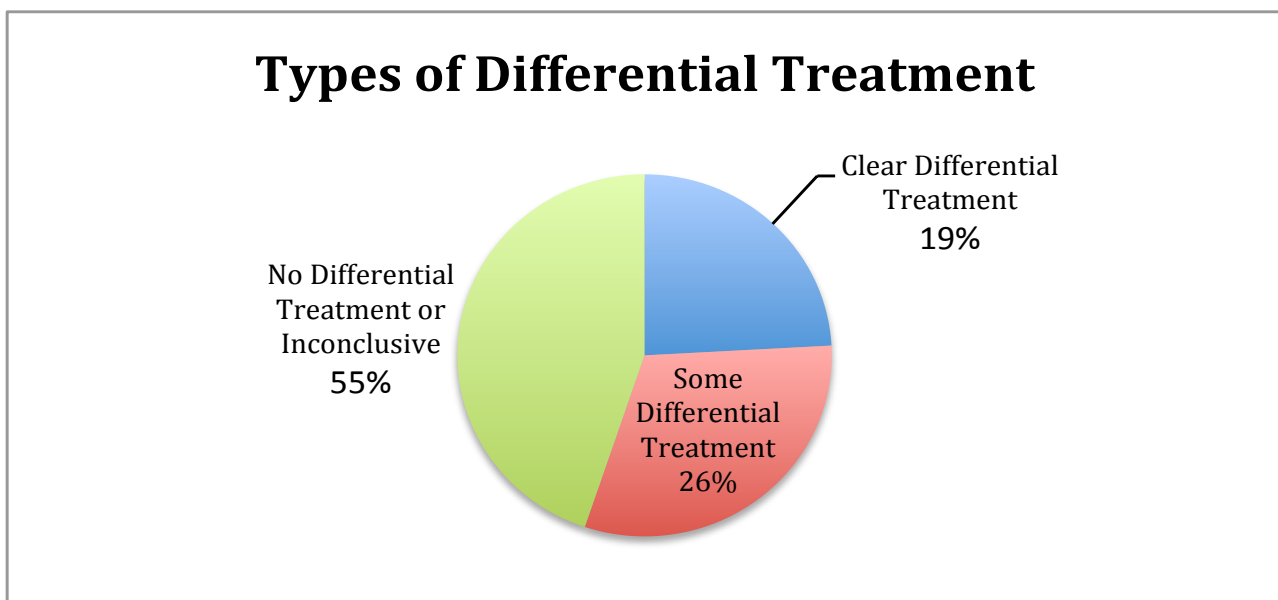
For purposes of this report, “no differential treatment” means each paired tester received identical or almost identical information. “Inconclusive outcome” includes those tests where the discrepancies did not favor the control tester, or tests where mitigating factors might explain certain differences.

A. Test Outcomes

Ten tests (19%) showed clear differential treatment favoring the control tester. Fourteen tests (26%) showed some differences in treatment favoring the control tester. Twenty-nine tests (55%) resulted in no differential treatment or an inconclusive outcome. **Thus, in 24 out of 53 tests (or 45%), there were at least some discrepancies or disadvantages in treatment for the disabled tester.**

Results of Tests in Solano County

Clear Differential Treatment	10 (19%)
Some Differential Treatment	14 (26%)
Subtotal/ Some Differential Treatment	24 (45%)
No Differential Treatment or Inconclusive Outcome	29 (55%)
Grand Total	53 (100%)



Test Results by City

City	Percentage of Tests Conducted in City Indicating Differential Treatment*
Benicia	4/4, or 100% of tests
Fairfield	10/17, or 59% of tests
Suisun City	2/3, or 67% of tests
Vacaville	4/7, or 57% of tests
Vallejo	4/11, or 36% of tests

*Inconclusive tests excluded from this calculation

B. TYPES OF DISCRIMINATION OR DIFFERENTIAL TREATMENT

The following is a description of types of discrimination encountered by testers during the audit, as well as a chart indicating the frequency of the types of differential treatment by test.

1. Refusal to Rent or Negotiate for Rental

A housing provider's explicit refusal to rent or to negotiate for the rental of a dwelling to a person in a protected class, including a refusal to engage in conversation, wholly forecloses an individual's ability to access housing opportunities.

2. Offering Different Rental Terms and Conditions

Differences in rental terms offered to callers may indicate a housing provider's desire to discourage – or encourage – specific types of prospective tenants. The terms and conditions of a rental unit may have a significant impact on an applicant's interest in pursuing a unit and financial ability to procure a rental unit. Rental terms and conditions include the amount of rent or deposits, the manner of payment of deposits, and minimum income requirements.

3. Making False Representations About Availability

The number of current and future units offered to an applicant may indicate whether a housing provider is seriously interested in making housing opportunities available.

4. Otherwise Making Housing Unavailable

A housing provider who, through either words or actions – for example, placing a caller on hold for an interminable period of time – arbitrarily restricts the availability of a housing opportunity for a member of a protected class may be engaging in a practice of otherwise making housing unavailable.

5. Quality of Information

The manner in which an owner or manager communicates regarding units for rents is often an important indication of their interest – or lack thereof – in a potential tenant. Discouraging remarks directed at an applicant from a protected class may be evidence of an attempt to discourage that applicant from pursuing a housing opportunity. Discriminatory statements are illegal under both federal and state fair housing laws. Steering speaks to the practice of arbitrarily restricting an applicant’s choice of available units, based on their membership in a protected class; for example, steering in the disability context might include directing a caller to a different unit or complex based on the housing provider’s assumptions about appropriateness. General treatment may also include encouraging only one tester by providing additional information on the application process.

Differences in the amount and/or type of information a housing provider gives to callers about who will qualify for tenancy may indicate a housing provider’s desire to discourage or encourage specific types of prospective tenants. Selective provision of information about minimum income requirements, minimum credit scores, documentation of income, and the application process may indicate that a housing provider employs different standards for evaluating prospective tenants based on their membership in a protected class.

6. Screening & Follow-Up

The decision to accept a potential applicant’s call or to follow up with a potential applicant after his or her initial inquiry may indicate whether a housing provider is excluding people in protected classes from their tenant selection process or arbitrarily restricting an applicant’s choice of available units and information received based on their membership in a protected class.

C. TYPES OF DIFFERENTIAL TREATMENT, BY TEST

Test #	Refusal to Rent/Negotiate	Different Terms & Conditions	False Representation About Availability	Otherwise Make Housing Unavailable	Quality of Information	Follow-Up
106608	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
106635	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		
106676	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		
107279		<input checked="" type="checkbox"/>				
107310	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
107377			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
106651		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	
106652		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	
107099		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
107420		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	
106595		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
106607					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
106586					<input checked="" type="checkbox"/>	
106956					<input checked="" type="checkbox"/>	
106960		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
106675						<input checked="" type="checkbox"/>
106776	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>	
106816					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
106805					<input checked="" type="checkbox"/>	
106950					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
106971					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
107110					<input checked="" type="checkbox"/>	
107278		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	
107430		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	
Total	5 (9%)	10 (19%)	3 (6%)	4 (7.5%)	18 (34%)	8 (15%)

Tests Indicating Clear Differential Treatment

Ten tests showed evidence of **clear differential treatment** based on disability. In four tests, the housing provider refused to negotiate for the rental of a dwelling with the disabled caller.

In one case, for example, the disabled tester phoned and asked whether the advertised unit was still available; the leasing agent immediately replied “No,” then told the tester she would need to call back because the agent was with someone else. The disabled tester phoned back later that day and spoke with the same leasing agent, who said “we told you we don’t have an apartment right now,” then put the disabled tester on

hold before ultimately hanging up on the tester without ever coming back on the line. In sharp contrast, when the control tester spoke with a leasing agent only an hour later, the agent stated the advertised unit *was* still available, and offered – unsolicited – that she expected more units to become available soon.

In another case, the disabled tester phoned and spoke with a man; after listening to the Relay Operator briefly explain the relay system, the man said “no, I don’t have time for this,” then hung up the phone. The deaf tester called back shortly thereafter, and the same man answered and said “I don’t want to do a relay call, I’m trying to eat my lunch,” then hung up. When the control tester phoned later that afternoon, she spoke with the same man, who confirmed the unit was still available and offered her a move-in bonus of half off the first month’s rent.

In a different test, the leasing agent made multiple rude comments to the disabled tester – including telling the relay operator that her voice was “irritating” – and hung up on her mid-call.

Several other tests resulted in evidence of clear differential treatment with respect to material rental terms and unit availability. For example, in one test, the non-disabled tester was offered a discounted security deposit; in another test, the non-disabled tester was quoted a lower monthly rent rate for the same unit.

Tests Indicating Some Differential Treatment

Fourteen tests showed evidence of **some differential treatment** based on disability. In nearly all of these tests, the quality of the interaction was heavily weighted in the favor of the non-disabled tester. For example, in one test, though both testers spoke with the same agent, the agent told the disabled tester there were too many units to be able to describe each one individually, but provided the non-disabled tester with specific rental rates and move-in dates for a number of different units. In multiple tests, only the non-disabled tester was asked for his or her contact information for follow-up purposes. This reflected a larger trend relating to the quality of the interaction: in numerous tests, the leasing agent only asked questions about ideal move-in date or desired amenities of the non-disabled testers, indicating a general reticence to fully engage with the disabled testers.

Tests Indicating No Differential Treatment or Inconclusive Outcome

Nineteen tests did not show evidence of differential treatment or were inconclusive. In tests with no differential treatment, testers received similar treatment and were given the same substantive information regarding availability, rent, security deposit, minimum income requirement, and total move-in cost. Inconclusive tests included those where the testers received slightly different information, yet the

differential treatment did not clearly benefit the control tester over the protected tester. Inconclusive tests also included those where the protected tester spoke with a housing provider, but the control tester was unable to make contact despite two attempts.

IV. CONCLUSIONS

A. GENERAL

Out of 53 tests in Solano County, ten of the tests (19%) showed clear differential treatment favoring the non-disabled tester. Fourteen tests (26%) showed some differences in treatment favoring the non-disabled tester. Twenty-nine tests (55%) resulted in no differential treatment or an inconclusive outcome. **Thus, in 24 out of 53 tests - nearly half of all tests - there were at least some discrepancies or disadvantages in treatment for the hearing impaired tester.**

The data is striking: more than one-third of the time, the disabled caller was provided with information about rentals that was significantly lower in quality than that provided to the non-disabled caller. In nearly one out of five calls, the non-disabled caller was offered more preferential rental terms and conditions than the disabled caller. And, almost ten percent of the time, housing providers simply refused to speak to disabled callers. This testing evidence suggests that when hearing impaired homeseekers can successfully clear the hurdle of speaking with a representative – which will not even happen ten percent of the time – almost half of the time, the disabled person will not be told about as many available apartments, will not be offered move-in specials or other incentives, will not be asked for his or her contact information for follow up, and/or will not be told about apartment amenities or the application process: all information that the non-disabled caller *will* be provided with.

B. AUDIT LIMITATIONS

1. Pre-Application Testing Underestimates the Degree of Discrimination

By virtue of its very design and purpose, this audit does not identify the full scope of discriminatory conduct. This audit sought to measure only the degree of discrimination an individual would encounter over the phone, at the most preliminary stage of the housing search. Because testers did not appear in person and did not submit applications, this audit cannot identify housing providers who dispense information freely but discriminate later in the tenant selection process. This suggests the need to

perform site visits and application tests in addition to the phone tests conducted to date, especially in those instances where phone tests suggest differential treatment. Completed application tests could yield evidence of housing providers turning down qualified disabled applicants because of their disability.

Even application tests would not detect the full extent of discrimination against in-place disabled *tenants*, as opposed to *applicants*. Renters with disabilities report discrimination based on disability, including refusal to make necessary reasonable accommodations; more than 60% of discrimination complaints FHOM fields in a given year relate to disability – and more specifically, failure to make reasonable accommodation. This audit cannot purport to examine evidence of that kind of discrimination.

2. Scheduling Factors May Have Influenced the Audit Results

The audit coordinators opted to alleviate unreasonable delays between the first and second testers' contacts by having them call at specified times. Although that solution reduced the volume of failed tests, the resultant pattern of calling may have subtly affected the test results.

In some of the tests, for example, the two testers spoke with different agents. Although the most direct comparison takes place in instances where each member of a paired test has contact with the same agent, a test remains valid under generally recognized principles of testing if testers speak with different agents representing the same housing provider.

3. Testing Protocol May Have Influenced Audit Results

As indicated above, the first (protected) tester of a pair called and hung up if he or she did not reach an agent. If the tester did not successfully connect with an agent after two calls, the second (control) tester of the pair did not call. Therefore, the results of testing housing providers with a practice of not answering live calls (i.e., sending all phone inquiries to a voicemail system, then returning calls at a later time) are not included in this audit.

C. RECOMMENDATIONS

- **Disseminate audit results** to Solano County officials, the general public, media, and advocacy groups as an important educational tool.
- **Monitor sites** where there was an indication of differential treatment. FHOM may take further action.
- **Offer Fair Housing training seminars** to the owners, managers, and agents audited in this report. The audit points out the need for continuous training in fair housing laws for all owners and managers of rental property, with an emphasis on the subtleties of differential treatment and the need to supply uniform information and treatment to all potential applicants, even over the phone. Fair Housing of Marin has conducted *Fair Housing Law and Practice* seminars throughout the North Bay for many years. Such educational endeavors should be supported by public officials and aggressively marketed to housing industry providers through housing associations and elected officials. It is important to ensure that all housing providers and their staffs receive fair housing information and training.
- **Send notification letters to housing providers** of properties where testing showed some differential treatment and encourage them to learn more about fair housing laws and best practices.
- **Increase media coverage.** Request that newspapers in Solano County feature articles on disability discrimination and barriers faced by persons with hearing impairments in making preliminary phone inquiries about rental housing, and consider providing free advertisements on recognizing and avoiding housing discrimination as a public service.
- **Conduct additional audits.** Because discrimination is so often subtle or cloaked as helpful suggestions, it may go undetected. Comparative studies such as this one are the best way to bring such practices to light. We recommend that Solano County consider funding similar studies in the future.
- **Housing Industry Action.** Ask members of the housing industry, such as property management firms in the area and local rental housing associations, to take a positive stance that fair housing is good business and good *for* business. We recommend that

these organizations publicly declare their support with a statement on their letterhead, outreach materials, and forms.

- **Spread the word to potential targets.** Work with other agencies serving the deaf and hard-of-hearing community to inform their clients of their fair housing rights and available services.
- **Promote display of required HUD poster.** Ask that rental property owners and real estate offices check to make sure that the required HUD equal opportunity housing provider logo is posted in plain view for applicants. The poster can be downloaded from the HUD website at <http://www.hud.gov/offices/adm/hudclips/forms/files/928-1.pdf> or a copy can be obtained by calling toll free 800-347-3739.