

MPM REASONABLE ACCOMMODATION POLICY

Introduction:

Metropolitan Property Management, Inc (MPM) is dedicated to ensuring that individuals with disabilities are not discriminated against on the basis of a disability in connection with the operation of its properties. Therefore, if an individual with a disability requests an accommodation, such as an exception to a no pet policy rule to have an assistance animal, or a modification to a rental unit or the common area, such as installing grab bars in a bathroom, MPM will provide such accommodations and modifications free of charge, unless doing so would result in an undue financial and administrative burden or would fundamentally alter the nature of the company's operations.

MPM will post a copy of its Reasonable Accommodation Policy and Procedures in the MPM corporate office and in all of its management/leasing offices. In addition, individuals may obtain a copy of MPM's Reasonable Accommodation Policy upon request from the site manager.

MPM will ensure that all appropriate staff will receive annual training on Fair Housing and Reasonable Accommodation Policies and Procedures, including all applicable federal, state and local laws and requirements regarding reasonable accommodations.

Definitions:

Reasonable Accommodation: An accommodation is a change, exception, or adjustment in any rule, policy, procedure, or service that may be necessary for a person with a disability to have equal opportunity to occupy and enjoy full use of their housing or common space.

Reasonable Modification: A modification is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises.¹

Person with a disability: A person with a disability, as defined under federal civil rights laws, is any person who:

- Has a physical or mental impairment that substantially limits one or more of the major life activities of an individual, or
- Has a record of such impairment, or
- Is regarded as having such impairment.

“Major life activities” are those activities that are of central importance to daily life including, but is not limited to, caring for oneself, performing manual tasks, walking, seeing, hearing, breathing, learning, and/or working.

¹ Recipients of federal financial assistance, like MPM, must make and pay for structural changes to usings and common and public areas that are needed as a reasonable accommodation for a person's disabilities, unless doing so is an undue financial and administrative burden or would fundamentally alter MPM's program.



“Has a record of such impairment” means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

“Is regarded as having an impairment” is defined as having a physical or mental impairment that does not substantially limit one or more major life activities but is treated by a public entity as constituting such a limitation; has none of the impairments defined in this section but is treated by a public entity as having such an impairment; or has a physical or mental impairment that substantially limits one or more major life activities, only as a result of the attitudes of others toward that impairment.

Reasonable Accommodation Policy

MPM is a recipient of federal funds and has a legal obligation to provide reasonable accommodations free of charge, to all applicants and residents who have a disability-related need for a reasonable accommodation. Reasonable accommodations may be necessary at all stages of the housing process, including application, tenancy, or to prevent an eviction. An accommodation request can be made either verbally or in writing to the site manager or any other individual working at the leasing office. If a verbal request is made, the site manager will memorialize the request into writing. The site manager will assist any and all individuals who need assistance making a request for an accommodation. All requests will be processed within 14 days, provided the site manager has all necessary information to make a decision on the request. If the site manager does not have all the necessary information to make a decision, he/she will notify the applicant or resident in writing of the need for additional documentation. All decisions on requests for reasonable accommodations will be provided in writing. Any reasonable accommodation request denial will include the reason(s) for denial. If a reasonable accommodation is denied, then we will engage in the interactive process to find other viable alternatives. Medical records will not be accepted or retained in the participant file.

Examples of reasonable accommodations include, but are not limited to:

- A. Making alterations to an MPM unit to make it fully accessible for use by a family member with a wheelchair;
- B. Transferring a resident from a unit that cannot be made accessible to a unit that is accessible;
- C. Widening the door of a community room or public restroom for wheelchair accessibility
- D. Adding or altering structural features so they may be used by a family member with a disability.
- E. Installing strobe-type flashing light smoke detectors in a unit for the hearing-impaired;
- F. Adding structural grab bars in a bathroom;
- G. Modifying for kitchen accessibility and/or providing accessible kitchen appliances;
- H. Installing a magnifier over a thermostat;
- I. Modifying for an accessible bathroom;
- J. Lowering the peephole on a door;
- K. Permitting an individual with a disability to have an assistance animal to assist them with a disability-related need, where no pets are otherwise allowed or where the size or breed of the animal is usually limited;



- L. Formatting documents with large-type, providing Braille documents, making cassettes or a reader available to an applicant or resident who is vision impaired (to assist during interviews or meetings);
- M. Providing an American Sign language (ASL) Interpreter to an applicant or resident with a hearing impairment (to assist during interviews or meetings);
- N. Permitting an applicant or resident to be accompanied or represented by a family member, friend or advocate at all meetings and interviews with MPM if the individual requires such representation due to a disability-related need; and
- O. Permitting an outside agency or individual to assist an applicant or resident with a disability to meet MPM's applicant screening criteria.

An applicant or resident family that has a member with a disability must still be able to meet essential obligations of tenancy as required under the lease, unless granting a disability-related accommodation would allow them to meet such criteria.

VERIFICATION OF REASONABLE ACCOMMODATION

If a person's disability is obvious or otherwise known to the housing provider, and if the need for the requested accommodation is also readily apparent or known, no further verification will be required by MPM. If someone's disability is not obvious or known or the need for the accommodation is not apparent or known, MPM may request written verification from a healthcare provider that the resident is a person with a disability and/or that there is a nexus between that individual's disability and the requested accommodation. MPM may verify a person's disability, only to the extent necessary to ensure that individuals who have requested a reasonable accommodation/modification have a disability-based need for the requested accommodation/modification. MPM will never require individuals to disclose confidential medical information or records to verify a disability. In addition, MPM will not require specific details regarding the nature or severity of an individual's disability. MPM may only request documentation to confirm the disability-related need(s) for the requested reasonable accommodation(s)/modification(s).

RIGHT TO APPEAL/GRIEVANCE PROCESS

When applicants with disabilities are denied assistance, the notice of denial must inform them of MPM's informal review process and their right to request a hearing. In addition, the notice must inform applicants with disabilities of their right to request reasonable accommodations to participate in the informal hearing process. Applicants or residents must submit their appeal within 15 business days of the decision. To discuss their rights and the appeals process, the housing applicant or resident should contact Joseph Moore, the Director of Operations at Metropolitan Property Management, Inc., from 8:00 am to 5:00 pm, Monday through Friday at: Telephone: (252) 946-0110 ext. 205 and TTY: (252) 946-1010

Any resident or applicant may also contact the agencies listed below to report housing discrimination.



**U.S. Department of Housing and Urban Development
Philadelphia Regional Office of Fair Housing and Equal Opportunity
100 Penn Square East, 10th Floor
Philadelphia, PA 19107
Telephone: 1-888-669-9777
TDD: 1-800-927-9275**

**Virginia Department of Professional and Occupational Regulation
(DPOR)
9960 Maryland Drive, Suite 400
Richmond, VA 23233-1463
Telephone: 888-551-3247
TDD: Virginia Relay 7-1-1**

Copies of this policy are available in an accessible format to persons with disabilities upon request.

