

## PHA REASONABLE ACCOMMODATION PLAN

Approved DEC152022

### 1.0 REASONABLE ACCOMMODATION

Sometimes people with disabilities may need a reasonable accommodation in order to take full advantage of the Provincetown Housing Authority housing programs and related services. When such accommodations are granted, they do not confer special treatment or advantage for the person with a disability; rather, they make the program accessible to them in a way that would otherwise not be possible due to their disability. This policy clarifies how people can request accommodations and the guidelines the Provincetown Housing Authority will follow in determining whether it is reasonable to provide a requested accommodation. Because disabilities are not always apparent, the Provincetown Housing Authority will ensure that all applicants/tenants are aware of the opportunity to request reasonable accommodations.

### 1.1 COMMUNICATION

Anyone requesting an application will also receive a Request for Reasonable Accommodation form.

Notifications of reexamination, inspection, appointment, or eviction will include information about requesting a reasonable accommodation. Any notification requesting action by the tenant will include information about requesting a reasonable accommodation.

All decisions granting or denying requests for reasonable accommodations will be in writing.

### 1.2 QUESTIONS TO ASK IN GRANTING THE ACCOMMODATION

A. Is the requester a person with disabilities? For this purpose the definition of person with disabilities is different than the definition used for admission. The Fair Housing definition used for this purpose is:

A person with a physical or mental impairment that substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment. (The disability may not be apparent to others, i.e., a heart condition).

If the disability is apparent or already documented, the answer to this question is yes. It is possible that the disability for which the accommodation is being requested is a disability other than the apparent disability. If the disability is not apparent or documented, the Provincetown Housing Authority will obtain verification that the person is a person with a disability.

B. Is the requested accommodation related to the disability? If it is apparent that the request



is related to the apparent or documented disability, the answer to this question is yes. If it is not apparent, the Provincetown Housing Authority will obtain documentation that the requested accommodation is needed due to the disability. The Provincetown Housing Authority will not inquire as to the nature of the disability.

C. Is the requested accommodation reasonable? In order to be determined reasonable, the accommodation must meet two criteria:

1. Would the accommodation constitute a fundamental alteration? The Provincetown Housing Authority's business is housing. If the request would alter the fundamental business that the Provincetown Housing Authority conducts, that would not be reasonable. For instance, the Provincetown Housing Authority would deny a request to have the Provincetown Housing Authority do grocery shopping for a person with disabilities.
2. Would the requested accommodation create an undue financial hardship or administrative burden? Frequently the requested accommodation costs little or nothing. If the cost would be an undue burden, the Provincetown Housing Authority may request a meeting with the individual to investigate and consider equally effective alternatives.

The Provincetown Housing Authority retains the right to be shown how the requested accommodation enables the individual to access or use the Provincetown Housing Authority's programs or services.

If more than one accommodation is equally effective in providing access to the Provincetown Housing Authority's programs and services, the Provincetown Housing Authority retains the right to select the most efficient or economic choice.

The cost necessary to carry out approved requests, including requests for physical modifications, will be borne by the Provincetown Housing Authority if there is no one else willing to pay for the modifications. If another party pays for the modification, the Provincetown Housing Authority will seek to have the same entity pay for any restoration costs.

If the tenant requests as a reasonable accommodation that they be permitted to make physical modifications at their own expense, the Provincetown Housing Authority will generally approve such request if it does not violate codes or affect the structural integrity of the unit.

Any request for an accommodation that would enable a tenant to materially violate essential lease terms will not be approved, i.e. allowing nonpayment of rent, destruction of property, disturbing the peaceful enjoyment of others, etc.

