Annual Fair Housing Audit Checklist

For Conventional Housing Providers

1. General Compliance

☐ All team members have completed Fair Housing training within the past 12 months

☐ Fair Housing signage (HUD Equal Housing Opportunity poster in English and Spanish) is visible in office and on website

☐ Written Fair Housing and Non-Discrimination policy is current and accessible to team members, and up to date

☐ Properties built for first occupancy after March 13, 1991 are accessible, meeting the FHA's 7 basic accessibility Design and Construction requirements

☐ Clear, written process exists for handling reasonable accommodation and modification requests

2. Marketing & Advertising

☐ Marketing materials (flyers, brochures, quotes), website, ILS, and social pages, posts, or comments contain no discriminatory language or implications

☐ Ads avoid discriminatory phrases like "perfect for singles" or "no kids"

☐ Digital ads (especially Facebook/Google, **I**nternet **L**isting **S**ites) are not targeting or excluding protected classes

☐ Marketing tools, social media images, and videos show diverse representation

☐ Website and online applications are accessible to persons with disabilities as per ADA Website Accessibility requirements

3. Screening & Leasing Practices

☐ Written screening criteria (credit, criminal, income, etc.) are consistently provided to every applicant

☐ Screening criteria are applied consistently to all applicants

☐ No use of blanket bans on criminal history or credit issues without individualized assessments

☐ Adverse action notices are issued to all applicants whose application is denied or approved with conditions

☐ Files show no evidence of differential treatment with no subjective commentary (e.g., inconsistent documentation or notes)

4. Reasonable Accommodations / Modifications

☐ Accommodation/modification request forms and policies are available in-office and online for prospects, applicants, and residents

☐ Team members are trained on what qualifies as a reasonable accommodation or modification

☐ Responses to requests are timely and well documented

☐ Requests for assistance animals are handled per HUD/DOJ guidance, not pet policies

☐ No fees, deposits, or breed restrictions applied to assistance animals

Note: Assistance animal is the inclusive term used by HUD to describe animals that provide disability-related support, including service animals, emotional support animals, therapy animals, comfort animals, psychiatric service animals, and similar support animals.

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5. Limited English Proficiency (LEP)

☐ Process exists for providing interpretation when needed

☐ Team members know how to access translation tools or services

☐ Vital documents can be provided to the individual or directly to interpreter services prior to signature when necessary

(Formal Four-Factor Analysis is not required for conventional housing but access must still be provided)

6. Physical Accessibility (FHA, Section 504 & ADA Standards)

☐ Leasing office, clubhouse, and public areas meet ADA accessibility requirements

☐ Ground floor units and common areas meet Fair Housing design and construction standards (for properties built after March 13, 1991)

☐ Accessible parking, routes, and entrances are maintained

☐ Grievance process exists for reporting accessibility issues and making requests for modifications

7. File & Policy Reviews

☐ Applications, screening results, and leases are complete and consistent (signed applications, screening results, leases)

☐ Application denials are well documented with non-discriminatory business-related reasons

☐ Written policies exist for: occupancy standards, transfer requests, lease violations, late fees, and deposits

☐ Policies are followed consistently and any exceptions are well documented and fair

8. State & Local Ordinance Review

☐ Additional protected classes for state, county, and city identified and included in policy

☐ Team members are aware of local rules regarding source of income, criminal history, eviction notices, fee limits, and disclosures

☐ Confirmed that late fees, deposits, fees and rent increases comply with local laws

9. Resident Interaction & Complaint Handling

☐ Establish a clear process for residents to submit complaints or grievances

☐ Residents know how to file a Fair Housing complaint internally or with HUD is desired

☐ Documentation of complaints and resolutions is regularly maintained

☐ Team members and residents are treated and communicated with consistently and respectfully regardless of background

10. Documentation & Monitoring

☐ Maintain written records of: accommodation and modification requests, complaints and resolutions, denials, conditional approvals, and adverse action notices

☐ Annual audit date documented

☐ Audit results shared with ownership/management and used for policy updates