



Miami Valley Fair Housing Center, Inc.

505 Riverside Drive

Dayton, OH 45405

937-223-6035

Jim McCarthy, President/CEO

March 20, 2020

Sent via email: ghumes@kamancus.com

The Carillon House Association, Inc.
c/o Garrett Humes, Attorney
Kaman & Cusimano, LLC
11311 Cornell Park Drive, Suite 220
Cincinnati, Ohio 45242

Re: Carillon House Pet Etiquette Brochure
2230 S. Patterson Blvd, Dayton, OH 45409

Dear Mr. Humes:

Thank you for your response of March 20, 2020. The revisions suggested still indicate there is confusion about pets as opposed to assistance and/or emotional support animals. Assistance animals, which include emotional support and service animals, meet some disability-related need for a disabled individual and should be understood as a device that assists an individual with their disability, while a pet is not. A disabled resident may have an assistance animal, s/he may have a pet, or s/he may have both. In any of these situations, the disabled resident has a right to, and may need, reasonable accommodations to fully use and enjoy their housing.

We cannot agree to the first suggested edit to "Replace the word 'pet' with the word 'animal' throughout the policy." Assistance animals cannot be held to the same limitations or restrictions as pets. Therefore changing the word pet to animal would further confuse this issue for both the Board and residents. A resident with an assistance animal should be informed that they must have control of the animal at all times in common areas, with or without a leash, and are responsible for cleaning up after the animal. This could be explained when a resident makes a reasonable accommodation request for an assistance animal.

The Miami Valley Fair Housing Center (MVFHC) agrees to the removal of the statements "Service, therapy and emotional support pets are not exempt from this policy. The ADA requirement is that 'reasonable accommodations' are made for service animals. Reasonable accommodations have been made by using the elevators, N. Garage ramp and N. Garage exits." This is necessary because disabled individuals with an assistance and/or emotional support animal cannot be limited on the routes they may take into and out of the building.

As to the third bullet point, MVFHC cannot agree to the sentence as written. Instead, please revise the sentence to read as follows. "A disabled resident who does not have a service or emotional support animal, but instead has a pet and because of their disability is unable to comply with these rules, should submit a request for reasonable accommodation to the manager, Gwyn Rotramel, via email to gwyn@applemgmt.com or by mail to Apple Property Management, PO Box 752108, Dayton, OH 45475."

Letter to Carillon House Association

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Residents should not be required to disclose a disability to the Board of Directors, which is comprised of their neighbors. Instead, MVFHC recommends limiting that information to the professional manager. Our experience is that professional managers are best able to maintain the individual's privacy as to their disability. In addition, professional managers often receive ongoing training on fair housing compliance, and are most aware of new facets of the law. For all of these reasons, as a best practice, we strongly recommend that the professional manager be designated to receive and make decisions on all requests for reasonable accommodations, and most requests for reasonable modifications.

The Center also encourages the Carillon House Association Board of Directors to receive training on Fair Housing, whether through MVFHC or another source. This would allow board members to better understand their obligations under the Act, and such trainings should be done periodically as board members turn over.

Sincerely,



Miranda Wilson
Fair Housing Analyst