

Reasonable Accommodation Support



Reasonable accommodation (RA) is a disability-related change to a housing rule, policy, or environment to help a tenant use and keep their housing. A public housing authority (PHA) is an agency (e.g., HACLA) that oversees public housing and housing vouchers in a municipality. This guide covers RA processes for HACLA, LACDA, and FHSP with an emphasis on what YOU can do during long wait times.

⚠️ **Case managers are a valid third-party verifiers. You don't need a clinician for every request.**

Explore Alternative Solutions Before Making Formal RA Requests

- Can we address the need through simpler/less-time-intensive solutions?
- Is there flexibility in current unit/building that landlord may grant informally?
- Have we explored connecting the participant to caregiving?

💡 **When Formal RA Request is Necessary:** If alternative solutions aren't enough, communicate this to the participant ASAP. Set realistic expectations. LA County processes often take 6-10+ weeks due to high volume. Understanding this timeline helps participants plan accordingly.

The 3 Key Elements of RA Requests

Element	Requirement
1. Disability	Participant must have a qualifying disability (no proof of diagnosis needed for request process)
2. Disability Nexus	Documentation explaining the specific barrier the participant faces in their current housing situation because of the disability
3. Reasonable	Justification how the requested accommodation is a reasonable way to remove or reduce the barrier without extreme burden

Example: Mobility impairment & incontinence (1-disability). Communal facilities in SRO building inaccessible (2-barrier). Transfer to unit with more accessible facilities (3-solution).

⚖️ **Legal Protections:** RAs are protected under the Fair Housing Amendments Act (federal), Fair Employment and Housing Act (CA), and Disabled Persons Act (CA). Housing providers can only legally deny an RA request based on: fundamental alteration of services, undue financial/administrative burden, or direct threat to the health/safety of others.

When Verification of Disability (VOD) Is Needed

If disability not obvious AND documentation confirming disability nexus not in file

⚠️ What housing providers **CAN** and **CANNOT** ask for:

- **CAN ask:** Confirmation that disability exists and RA needed
- **CANNOT ask:** Diagnosis, medical records, or detailed medical information

⚠️ **Who can verify:** For non-obvious disabilities, verification must come from someone with knowledge of the disability: doctor, psychiatrist, psychologist, therapist, social worker, occupational therapist, or case manager.

💡 **VOD verifies a disability exists, but NOT necessarily the nexus.** E.g., if someone receives SSI, they have a disability. However, the PHA may still need explanation of WHY a specific accommodation is needed to support the disability (e.g., why they need a live-in aide).

Common RA Scenarios in ICMS

🛏️ **Live-in Aide Approval**
1BR → 2BR for aide needed for ADLs (bathing, dressing, meals)

🚿 **Grab Bars / Safety Modifications**
Install grab bars inside the shower, shower seat, or handrails for mobility

🏠 **Unit Relocation**
Transfer due to PTSD triggers, accessibility limitations, or other safety concerns

🐕 **Assistance Animal**
SA (emotional support) or service animal (trained tasks) in "no pets" building

📅 **Payment Schedule Change**
Adjust rent due date to match SSI/SSDI payment schedule

♿️ **Mobility & Stairs**
Ground floor unit or elevator access for wheelchair/walker/mobility issues

🚗 **Accessible Parking**
Assigned close parking for mobility disability or medical equipment

🕒 **Extended Deadlines**
Extra time for recertification or paperwork due to cognitive disability

Stakeholders in RA Request Process

Participant	Communicate housing barriers to case manager; sign forms; follow up with landlord for unit requests
Case Manager	Explore alternative solutions first; gather docs (consent, VOD, nexus); write RA request letter; ensure RA request submitted properly; track timeline and escalate if needed; document plans and steps in CHAMP
PHA (or FHSP)	Process RA requests in a timely manner; communicate missing request elements; provide written decision; process appeals (HACLA: 30 days, LACDA: 15 days)
Property Manager or Landlord	Abide by housing laws; honor approved accommodations (animals, mods, transfers, parking); cannot charge pet fees for assistance animals; cannot retaliate for RA requests
HSH Clinical (as needed)	Consult case managers on complex mental health/medical cases; trauma informed transfer support; provide VOD when applicable

[Learn more about Reasonable Accommodations](#)

Case Manager Action Steps for Identifying and Supporting Participant RA Needs

01 Assess Housing-Related Needs Any under-supported disabilities identified? Who handles it?

- Is there a disability nexus needing attention?
- Consider alternative solutions before initiating formal RA process
- Identify RA type as [unit modification / assistance animal / policy change / unit transfer]
- Determine RA request recipient – PHA for policy/rule changes (voucher) | Landlord for unit/animal requests

💡 Quarterly 5x5s and HAIs help with identifying participant needs to inform and prioritize Care Plan updates.

02 Develop Care Plan SMART Goal for RA Document RA Goal in participant's ICMS Care Plan

SMART Goal Example: "Participant will obtain reasonable accommodation for [specific need] by [date] to reduce [specific barrier] as evidenced by PHA approval letter."

💡 Use Care Plan Action Steps to track progress towards RA Goal (e.g., gather docs, submit request, follow up)

03 Gather Documentation Verify disability and nexus, and justify reasonableness

- Have participant sign universal consent addendum for PHA communication
- Write short letter that 1) confirms disability, 2) explains disability nexus, and 3) specifies accommodation needed to reduce barrier.
- If nexus not obvious, obtain VOD letter from qualified professional (doctor, therapist, social worker)
 - Confirm VOD letter states: disability exists AND requested accommodation supports disability

⚠️ PHAs/Landlords cannot ask for diagnosis or medical records – only disability nexus.

Templates & Guides

[🔗 More HACLA RA Info](#)

[🔗 More LACDA RA Info](#)

[🔗 Other PHA RA Info](#)

04 Submit Request Complete forms and send to correct party

💡 ICMS Snapshot indicates housing subsidy provider (HACLA vs LACDA vs FHSP)

- Where to submit RA Requests: TBVs -> PHAs | PBVs -> Prop. Mgmt. | FHSP -> Brilliant Corners
- Submit written request using PHA form or landlord form
- Communicate realistic timeline expectations to participant (6-10+ weeks for LA County)
- Set calendar reminders for follow up (Day 21, 42, 56)
- In CHAMP, update Action Step progress in Care Plan and record PH Retention Assistance Service.

Forms

[📄 Sample Letters](#)

[📄 HACLA RA Request](#)

[📄 LACDA RA Request](#)

[📄 FHSP GA Request](#)

05 Follow Up & Appeal Track all follow-ups in the Care Plan

For Rule/Policy Change Requests (PHA handles):

- **Week 3:** Call PHA to confirm receipt and ask if more info needed.
- **Week 4&5:** Research backup options. Check in with participant weekly about RA progress.
- **Week 6:** If no response by Day 42, send follow-up email to PHA and call them.

For Unit/Property Requests (Landlord handles):

- **Week 1&2:** Have participant follow up with landlord/property manager directly.
- **Week 2&3:** Support participant in documenting all communication attempts.
- **Week 3+:** Escalate to PHA for advocacy if landlord is unresponsive or denies improperly.

✅ If Approved

General: Congratulate participant, coordinate next steps together, ensure reflected in Care Plan

For Transfers:

- **Before and After Transfer:** Contact HSH program manager to find out if CHAMP or RMS updates needed

❌ If Denied

Day 1: Call PHA and ask for specific reason

Day 2-6: Review against 5 valid denial reasons. If invalid denial, prepare appeal.

Day 7-14: File appeal for invalid denial (HACLA: 30 days | LACDA: 15 days | FHSP: 30 days)

If appeal denied, consider HUD or CRD complaint

Appeal Resources

[🔗 File HUD Complaint](#)

[🔗 File CRD Complaint](#)

[📄 Appeal Template](#)

[🔍 Legal Aid Directory](#)

💡 Using the Care Plan and Case Notes in CHAMP to detail all RA support provided keeps other care team members (e.g., HSH Clinical) informed to help optimize outcomes.

⚠️ **Valid Denial Reasons:** (1) No disability, (2) Unclear disability nexus, (3) Not necessary, (4) Fundamental alteration of program, (5) Undue burden or direct threat to safety.

⚠️ **If additional documentation is requested, provide it ASAP!** YOU can verify as case manager! Document these Action Steps in Care Plan.

Comments, Questions, or Feedback about this guide? [Let us know](#)