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Page 2: 3.A:

- The text states that all requests must be delivered in writing, then instructs the general manager to log all "written or oral" requests. This paragraph contains contradictory statements that should be resolved.

Page 2: 3.B:

- The requirement that a request for modification include plans and details of the proposed work, as well as contractor information, might be viewed as an unreasonable burden. Was this in the original draft policy from GHI's legal counsel? It seems to me that a reasonable first step in a request for modification is for the member to meet with someone from Technical Services so the proposed modification is acceptable to both GHI and the member before developing detailed plans.

Page 2: 4.A:

- This process does not include ARC. Depending on the requested modification ARC may need to be involved. This paragraph brings up the interesting question of whether or not this should be discussed in an open or closed board meeting. If the proposed modification involves changes that can affect other members then what is GHI's responsibility to those other members in this process?

Page 3: 4.D:

- This seems to be something that is more in the role Technical Service's that the board president.

Wow. That is not a policy, it is a punt.

The board should have no hand in approving or disapproving handicap accommodations to member units as long as the repairs can be done legally with county permits and inspections.

Unless the changes are structural, electrical or plumbing, there is no need for management to be notified because there is no need to get county permits.

Further layers of "approval" by a non professional member board is both onerous and obstructive to the member who needs to install a ramp or widen doors, or install a stair lift, or whatever else it is possible to theorize might be a reasonable accommodation. Delaying a member need for a new handicap ramp or hard-

3 comments:

1) page 3-C -suggest changing 'vacation' to VACATING. none of my dictionaries indicate a definition for 'vacation' for what you are documenting

2) pages 4 and 6 are blank. is there supposed to be something there?

3) if someone needs a chair lift (that goes up and down the stairs) is this something that is covered by this document or can it be installed without getting approval from ghi? should there be a short list indicating examples of what would be included in reasonable accommodation (noting that the list is not all-inclusive)? what happens if someone modifies a home without previous approval because s/he didn't realize it came under this rule?

As I was cc'd on the message below, thought that I would review the proposed policy and comment with specific actionable items. I do think that some of the policy as written is a bit onerous for a member or other requesting party, particularly one who may have recently suffered a setback requiring the accommodation. In addition, some of the wording of the proposed policy could benefit from some editing. Am providing some comments and suggestions.

Under Section 1 (Purpose), the proposed policy states that the Board will implement appropriate action; implement seems to be an awkward word choice. Question whether we need more than evaluate and respond.

Under section 2 (Reasonable Accommodation), part B, would begin the first sentence of the definition with "Under the Fair Housing Act," because that is the source of the sentence. See no reason for the second sentence in that paragraph. It suffers from tone issues. It is not GHI's job to determine in advance what reasonable accommodation is required; the requesting party determines what they need and requests the accommodation. Suggest dropping that sentence.

Under section 3 (Requests for Reasonable Accommodation and/or Modification), part B, subpart 4, why does GHI need the requesting party to specify which rule, policy, practice, or service of the Corporation is causing a problem with the disability? How many parties know how to locate and provide that information? The Fair Housing Act requires GHI to make changes to rules, policies, practices, and services when such accommodations are needed for persons with disabilities to have an equal opportunity to use and enjoy a dwelling and public and common use areas. Requiring the member to provide this information seems onerous and unnecessary. Suggest dropping that sentence and renumbering the subparts..

Under section 4 (Consideration of Requests), for part A, would like to see a restriction on the Board that requests for accommodation cannot be pushed to a second or third scheduled meeting as some agenda items have been this year. Also, have some issues with parts B, C, and D. For part B, suggest rewording as follows: "If the Board grants the request for accommodation in whole, the General Manager will notify the requesting party." I'm not sure what kinds of arrangements the General Manager would have to make for the implementation of the request if the requesting party is responsible for all costs. so question whether we need that text. Then parts C.

Having walked with an above-the-knee prosthetic leg for 77 years, I consider myself as someone who might, at some point, need to use the "reasonable accommodation" procedure. My situation is so long standing and so obvious that I think it should not be necessary to get a doctor's certification. I have license plates and hangers for folks with a permanent mobility disability and my prosthetic leg is visibly obvious.

Also, there are accommodations that I'm not sure are covered involving maintenance. For example, as a now-84-year old (with an above-the-knee prosthetic leg), I am more chary about climbing a ladder to replace ceiling lights. Also, as a person with arthritis in my hands and more difficulty arising from the floor, the under-the-sink water turn-offs are becoming difficult for me (e.g, shutting off for cold weather) .Please take folks like me and The policy looks ok to me, except I don't see anywhere that it states that GHI cannot approve an accommodation that is not allowed by PG County code. I think stating the limitation on what GHI can allow is important to include in the policy.

Lola Skolnik

Thank you for the opportunity to review the proposed policy on the provision of reasonable accommodations. My observations are derived from over 25 years as a Disability Program Manager at the Department of Health and Human Services and NASA/Goddard Space Flight Center.

First and foremost, "Nothing about us, without us."

I strongly suggest that GHI create a small ad hoc committee of members with disabilities to review and write the final policy. Perhaps, if GHI had such a committee writing this draft, most, if not all, of the following issues would most likely not present.

Here are my comments and observations, based on my professional and personal experience, about the policy as drafted. Much of this policy review involves the need for a designated Reasonable Accommodation Specialist who should handle all requests.

1. Please use non-binary language in this and all policies. In the first paragraph, I see "... a person with a disability to use and enjoy his or her dwelling units ..." (emphasis added)
2. In the first paragraph, I see "... believes it to be in the best interest of the Corporation ..." I believe a policy should, at the very least, be in the best interest of the members.
3. I suggest that the Board not be the entity to evaluate requests for Reasonable Accommodation. That should be the responsibility of a subject matter expert, a Reasonable Accommodation Specialist, who is knowledgeable about the many aspects and intricacies of reasonable accommodation, accessibility, and the issues that individuals with disabilities face in housing. To protect the privacy of the individuals who are making requests, the Board should not be involved in these matters. The process should be limited to those with a valid "need to know" who will help in the evaluation and decision making process. The person given the responsibility to evaluate the request should have the complete authority to approve the reasonable accommodation, to decide who is responsible to pay for the accommodation and commit GHI to pay for those accommodations, if appropriate.

This Reasonable Accommodation Specialist should report to the General Manager who then conveys to the Board only the statistics on how many people make requests, how many are approved, how many are not approved and the reasons for the denial, what costs are involved in providing the request, and other non-identifiable information that is appropriate for auditing or budgeting purposes. Statistics can and should be reported, but they should be sanitized to protect the privacy of the individual making the request.

4. In Section 1. Purpose. Again, the Board should not evaluate, respond to, or implement the requested

To the Management of GHI and the Board of Directors:

I am writing to give my comments regarding the Proposed Reasonable Accommodation Policy. I am very happy to hear that there are plans to put such a policy in place that would allow all members of GHI access to participating in the cooperative and to modify their units to meet their needs. I have a few questions and comments that I would like to share.

1. **Comment:** Please edit this document to use person-first language. It is noted that under Section B “Reasonable Accommodations,” the term “disabled individual” is used. It is widely accepted that person-first language should be used, and therefore I request that this term be changed to “individual with a disability.”
2. **Question:** When the member must bring this to the Board of Directors, will this be presented in a closed session? This draft does not make clear whether the accommodation or modification request is brought to the Board in a public or private session. I believe it would be inappropriate and a violation of privacy were this required to be brought to a public session. If it will be a private session, that should be made clear in this document. If it is not in a private session, then I believe that this is a necessary change for member privacy and confidentiality.
3. **Question:** Does this policy also apply to members with intellectual disabilities? I can see that many other disabilities are listed, however intellectual disabilities are not included in this document or on the request form.

Thank you for considering my questions and comments.