

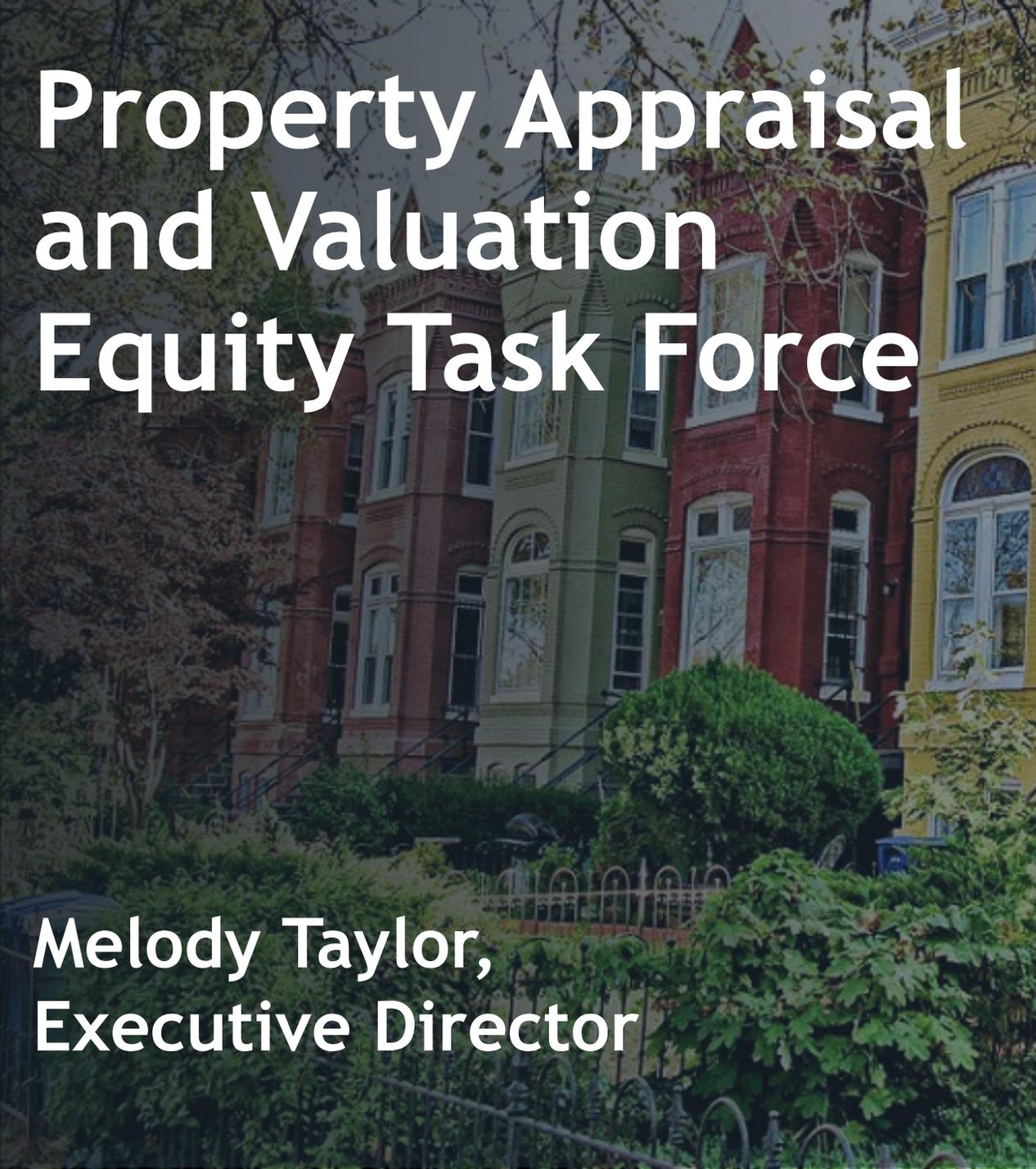
Strategies for Investigating Discriminatory Residential Appraisals

Thank you for participating. The event will begin shortly...



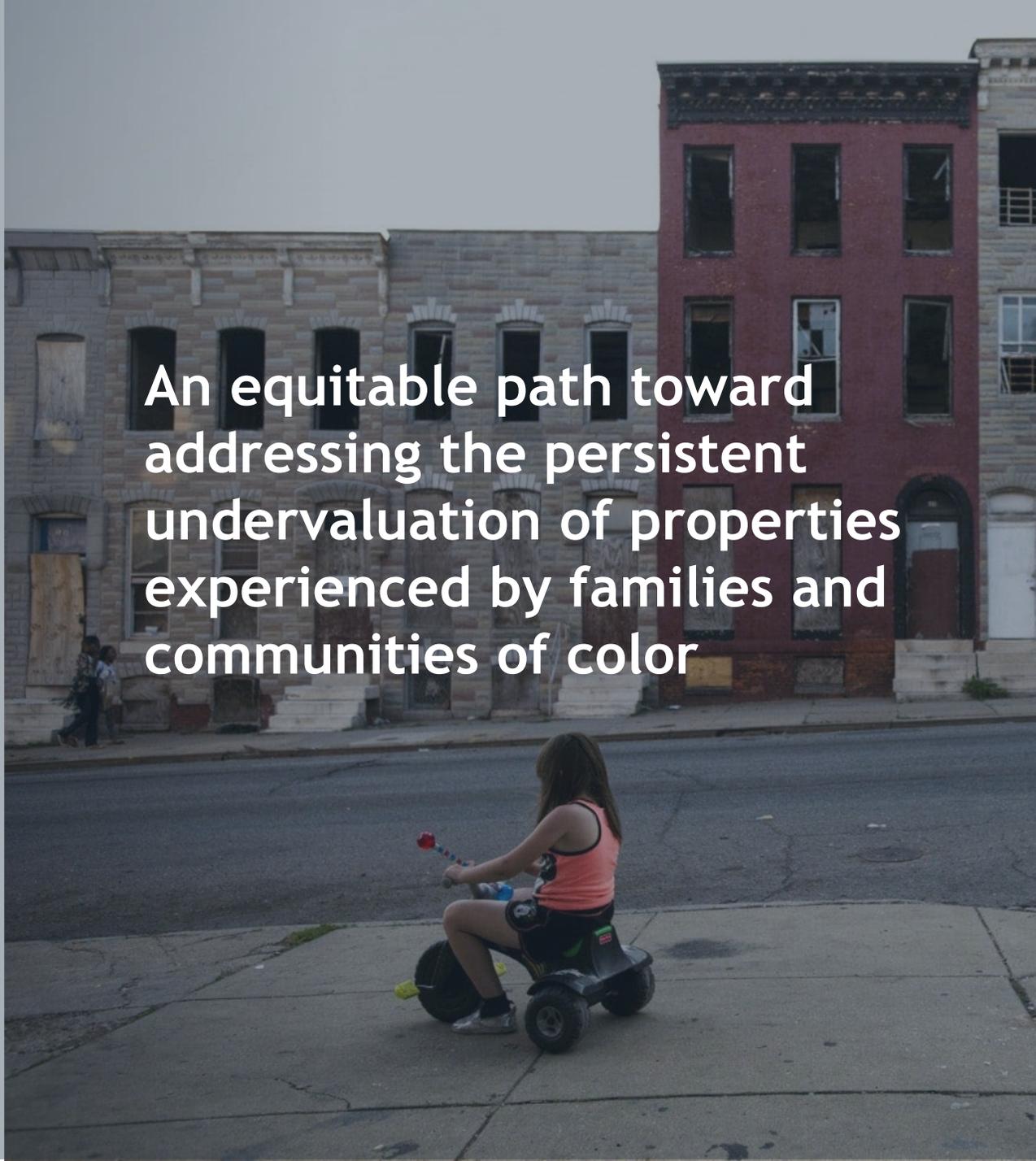
Technical Tips

- To access Closed Captioning, click the Live Transcript button, and then click "Show Subtitles" to view closed captioning.
- You can choose for your audio to come through your computer speakers or your phone.
- This event is being recorded. Materials will be posted on www.HUDEXchange.info/NFHTA
- For technical difficulties:
 - Sign out, then sign back in
 - Request help in the Q&A box
 - Email NFHTA@cloudburstgroup.com for further assistance



Property Appraisal and Valuation Equity Task Force

Melody Taylor,
Executive Director



An equitable path toward
addressing the persistent
undervaluation of properties
experienced by families and
communities of color

OBJECTIVES

Evaluate/Identify (The Report)

Harmonize (Find ways to Align)

Leverage (Agency Authorities)

Coordinate (Public Awareness)

Recommend and Implement

ANCHOR IN OUR STRENGTHS

Department of Housing and Urban Development	Domestic Policy Council
Appraisal Subcommittee	Board of Directors of the Federal Reserve Bank
Consumer Financial Protection Bureau	Department of Agriculture
Department of Education	Department of Justice
Department of Labor	Department of Veterans Affairs
Federal Deposit Insurance Corporation	Federal Housing Finance Agency
Office of the Comptroller of the Currency	National Credit Union Administration and Federal Financial Institutions Examination Council
National Economic Council	

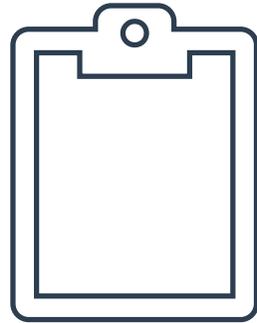


PAVE

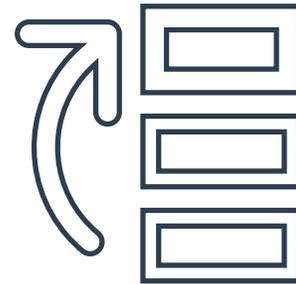
Interagency
Task Force



Engage



Survey



Prioritize



One-on-Ones



Endorse



Workstreams



Infrastructure



Stakeholders

BENEFITS TO THE PUBLIC

- Ensure all Americans receive fair market value appraisals of their homes
- Have access to equitable mortgage financing
- Narrow the wealth gap in our society and stem the tide of the persistent and systemic undervaluation of homes within our society's Black and Brown communities

Website
www.PAVE.hud.gov



Learning Objectives

- Provide a comprehensive overview of the legal standards for appraisal discrimination cases
- Identify intentional and unintentional appraisal discrimination that occurs in the purchase, refinance, or sale of a home
- Build FHIP and FHAP investigators' capacity in investigating appraisal cases
- Review existing conciliations and settlements

Reminders

- This event is being recorded.
- Materials, including the slide deck and event recording, will be posted on www.HUDExchange.info/NFHFTA.
- Submit questions in the Q&A box at any time during today's event.

Fair Housing

DANE LAW

Civil Rights

APPRAISAL DISCRIMINATION

Stephen M. Dane

Dane Law LLC

www.fairhousinglaw.com

FAIR HOUSING ACT

42 U.S.C. 3604(a): “otherwise make unavailable or deny” a dwelling because of race

- Applies to discriminatory appraisals
 - Hanson v. Veterans Admin., 800 F.2d 1381 (5th Cir. 1986)



FAIR HOUSING ACT

42 U.S.C. 3605: Prohibits discrimination in any aspect of a residential real estate related transaction

- Financial services
- Insuring properties
- **Appraising properties**



FAIR HOUSING ACT

42 U.S.C. 3605:

(c) APPRAISAL EXEMPTION. Nothing in this subchapter prohibits a person engaged in the business of furnishing appraisals of real property to take into consideration factors other than race, color, religion, national origin, sex, handicap, or familial status.



EQUAL CREDIT OPPORTUNITY ACT

15 U.S.C. 1691:

It shall be unlawful for any creditor to discriminate against any applicant, with respect to **any aspect of a credit transaction**—

(1) on the basis of race,



EQUAL CREDIT OPPORTUNITY ACT

12 C.F.R. 128.11 [Comptroller of the Currency]

(a) Appraisal. No [regulated lender] may use or rely upon an appraisal of a dwelling which the [regulated lender] knows, or reasonably should know, is discriminatory on the basis of the age or location of the dwelling, or is discriminatory per se or in effect under the Fair Housing Act of 1968 or the Equal Credit Opportunity Act.



12 CFR 128.9

(7) Age and location factors. Sections 128.2, 128.11, and 128.3 of this chapter prohibit loan denials based upon the age or location of a dwelling. These restrictions are intended to prohibit use of unfounded or unsubstantiated assumptions regarding the effect upon loan risk of the age of a dwelling or the physical or economic characteristics of an area. Loan decisions should be based on the present market value of the property offered as security (including consideration of specific improvements to be made by the borrower) and the likelihood that the property will retain an adequate value over the term of the loan. Specific factors which may negatively affect its short-range future value (up to 3-5 years) should be clearly documented. Factors which in some cases may cause the market value of a property to decline are recent zoning changes or a significant number of abandoned homes in the immediate vicinity of the property. However, not all zoning changes will cause a decline in property values, and proximity to abandoned buildings may not affect the market value of a property because of rehabilitation programs or affirmative lending programs, or because the cause of abandonment is unrelated to high risk. Proper underwriting considerations include the condition and utility of the improvements, and various physical factors such as street conditions, amenities such as parks and recreation areas, availability of public utilities and municipal services, and exposure to flooding and land faults. However, arbitrary decisions based on age or location are prohibited, since many older, soundly constructed homes provide housing opportunities which may be precluded by an arbitrary lending policy.

EQUAL CREDIT OPPORTUNITY ACT

12 C.F.R. 701.31 [Credit Unions]

Consideration of any of the following factors in connection with a real estate-related loan is not necessary to a Federal credit union's business, generally has a discriminatory effect, and is therefore prohibited:

- (i) The age or location of the dwelling;
- (ii) Zip code of the applicant's current residence;
- (iii) Previous home ownership;
- (iv) The age or location of dwellings in the neighborhood of the dwelling;
- (v) The income level of residents in the neighborhood of the dwelling.

Fair Housing

DANE LAW

Civil Rights

FIRST – A BIT OF HISTORY

1931 EDITION OF MCMICHAEL'S APPRAISING MANUAL

Appraisers advised to determine whether there were "**undesirable racial elements**" in the area being appraised.

Fair Housing

DANE LAW

Civil Rights

1932 EDITION OF THE VALUATION OF REAL ESTATE

"There is one difference in people, namely **race**, which can result in very rapid decline [in real estate values]."

Fair Housing

DANE LAW

Civil Rights

1935 EDITION OF AIREA MANUAL, REAL ESTATE APPRAISAL

"To have the attributes of a good residential area, it is essential that protection be afforded against the **infiltration of inharmonious racial groups**"

EXCERPT FROM FHA'S UNDERWRITING MANUAL (1938)

"Areas surrounding a location are investigated to determine whether **incompatible racial and social groups** are present, for the purpose of making a prediction regarding the probability of the locations being invaded by such groups. If a neighborhood is to retain stability, **it is necessary that properties continue to be occupied by the same social and racial classes**. A change in social or racial occupancy generally contributes to instability and a decline in values."

**RANKING OF RACE AND NATIONALITIES BY
IMPACT ON REAL ESTATE VALUES**
AS REPRINTED IN MCMICHAEL'S APPRAISING MANUAL (4TH ED. 1951)

- English, Germans, Scotch, Irish, Scandinavians
- North Italians
- Bohemians or Czechs
- Poles
- Lithuanians
- Greeks
- Russians, Jews (lower class)
- South Italians
- Negroes
- Mexicans

AIREA MANUAL, THE APPRAISAL OF REAL ESTATE (1967)

"The **value levels** in a residential neighborhood **are influenced more by the social characteristics** of its present and prospective occupants **than by any other factor**. Therefore, the appraiser must give major consideration to the importance of social data."

AIREA MANUAL, THE APPRAISAL OF REAL ESTATE (1967)

“The causes of racial and ethnic conflicts are not the appraiser's responsibility. However, he must recognize the fact that **values change when people who are different from those presently occupying an area advance into and infiltrate a neighborhood.**”

AIREA COURSE MATERIAL STUDENT OUTLINE (1973)

"**Ethnological information also is significant** to real estate analysis. As a general rule, homogeneity of the population contributes to stability of real estate values. Information on **the percentage of** native born whites, foreign whites, and **non-white population is important**, and the changes in this composition have a significance"

AIREA COURSE MATERIAL STUDENT OUTLINE (1973)

“.... As a general rule, **minority groups** are found at the bottom of the socio-economic ladder, and problems associated with **minority group segments of the population can hinder community growth.**”

UNITED STATES V. AMERICAN INSTITUTE OF REAL ESTATE APPRAISERS, 442 F. SUPP. 1072 (N.D. ILL. 1977)

Allegations: Defendant promulgated “standards which have caused appraisers and lenders to treat race and national origin as negative factors in determining the value of dwellings and in evaluating the soundness of home loans; and failing to take adequate steps to correct the continuing effect of past discrimination.”

Settlement: AIREA will adopt three fundamental policy statements:

- (1) It is improper to base a conclusion or opinion of value upon the premise that the racial, ethnic, or religious homogeneity of the inhabitants of an area or of a property is necessary for maximum value.
- (2) Racial, religious or ethnic factors are deemed unreliable predictors of value trends or price variance.
- (3) It is improper to base a conclusion or opinion of value, or a conclusion with respect to neighborhood trends, upon stereotyped or biased presumptions relating to race, color, religion, sex or national origin or upon unsupported presumptions relating to the effective age or remaining life of the property being appraised or the life expectancy of the neighborhood in which it is located.

Fair Housing

DANE LAW

Civil Rights

RELEVANT LEGAL STANDARDS

- Discriminatory Intent
- Disparate Impact

WHAT TYPE OF DISCRIMINATION IS ALLEGED?

- Characteristics of the homeowner or buyer (race, sex, age, etc.), or
- Location of the property or characteristics of the neighborhood, or
- Both

CIRCUMSTANTIAL EVIDENCE OF INTENT TO DISCRIMINATE

- Variations from established practices
- Variations from best practices
- Unusual sequence of events
- Negative comments about neighborhood
- Failure to include positive aspects of neighborhood
- Use of inappropriate comparable properties
- Excessive adjustments to comparable properties
- Statistical analysis

CIRCUMSTANTIAL EVIDENCE OF INTENT TO DISCRIMINATE

Accuracy and Completeness of Appraisal

- Are all the facts contained on the appraisal true?
- Does the appraisal contain all relevant facts or is important information missing?
- What comments are made about the neighborhood?
 - Are they accurate? Are they complete?
 - Did the appraisal mention only negative information about the neighborhood and ignore positive developments?

CIRCUMSTANTIAL EVIDENCE OF INTENT TO DISCRIMINATE

- Compliance with Best Appraisal Practices
 - Appropriate use of comparable properties
- Comparative Appraisals
 - Any significant differences in how appraisals are conducted in neighborhoods of different racial composition
- Contents of Appraiser's "Standard" File Regarding the Subject Neighborhood
 - Accuracy and completeness of information
 - Comparison of contents to other neighborhoods

CIRCUMSTANTIAL EVIDENCE OF INTENT TO DISCRIMINATE

Reputation of Appraiser Within Real Estate Community

- Realtors
- Banks and Credit Unions
- Community Development Agencies
- Municipal Government
- Other Appraisers

STEPTOE V. SAVINGS OF AMERICA 800 F. SUPP. 1542 (N.D. OHIO 1992)

Evidence sufficient to support prima facie inference of discrimination:

- Policies relating to appraisals not followed
- Expert testified appraisal was defective in various ways
- Appraisal by another company supported property sale value
- Statistical analysis suggested differing treatment based on racial composition of neighborhood

DISPARATE IMPACT

- Facially Neutral Policy, Practice, or Guideline
- Uniformly Applied
- Has Substantially Disparate Impact
- On Protected Class
- Evidence of Intent Not Required

DISPARATE IMPACT

- Defendant Must Show:
- Policy, Practice, Guideline is Necessary to Conduct Business
- No Less Restrictive Alternatives Available

RELIEF AVAILABLE

- Compensatory Damages (no caps)
- Punitive Damages (no caps)
- Attorneys Fees
- Litigation Costs/Expenses
- Injunctive Relief
- Affirmative Relief

AFFIRMATIVE RELIEF

- Fair Housing Training
- Adoption of Best Practices
- Quality Control Procedures
- Self-Testing Programs
- Community Relief

NFHA

NFHTA FORUM: Strategies for Investigating Discriminatory Residential Appraisals

www.nationalfairhousing.org
@ItsLisaRice

Photo credit: Bernie Kleina



Homeownership while black

BROOKINGS

Differences in **home** and **neighborhood quality** do **not** fully explain the devaluation of homes in majority-black neighborhoods



\$48,000
average loss
in home market value



Amounting to
\$156 billion
in cumulative losses

Homes of similar quality in neighborhoods with similar amenities are worth **23% less** in majority-black neighborhoods

DESIGNING THE INVESTIGATION

Learn Basics of Appraisal Practices

The Appraisal Foundation

- 15-Hour Course
- 7-Hour Maintenance Course

Uniform Standards of Professional Appraisal Practice

- USPAP
- Issued by Appraisal Standards Board

Uniform Appraisal Form

- Government Sponsored Enterprises (GSEs)

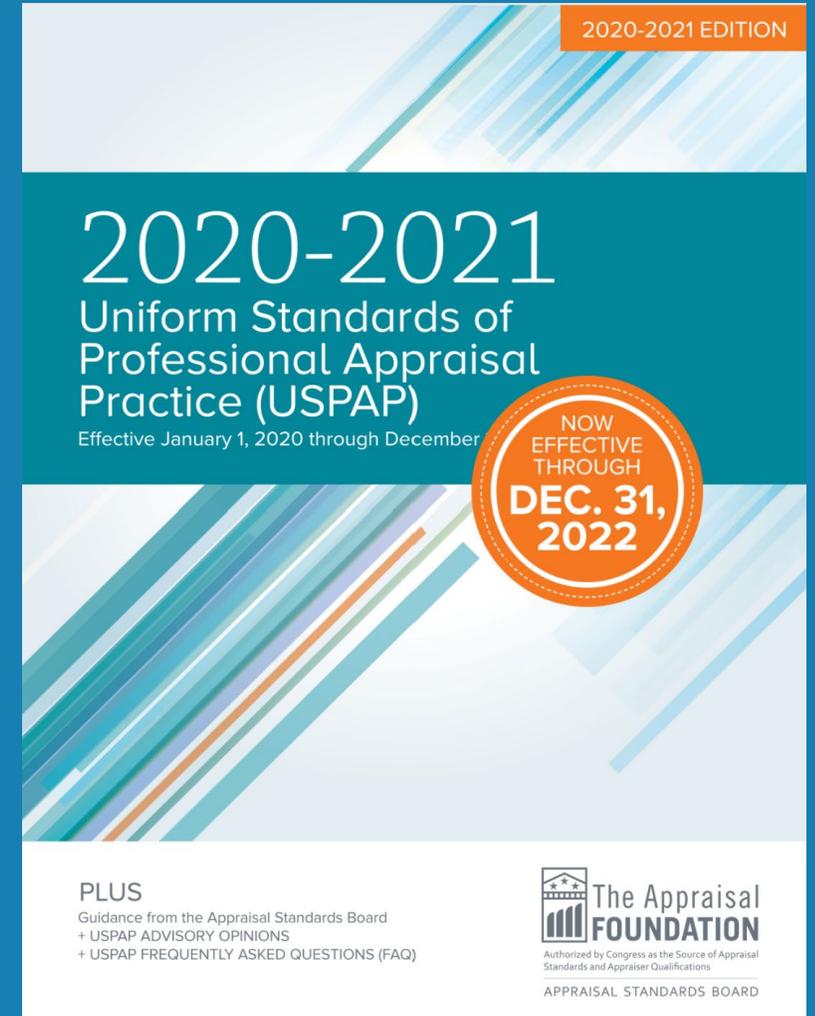
Q&As from the Appraisal Standards Board on USPAP

GSE & FHA Standards

Other training opportunities

www.nationalfairhousing.org

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DESIGNING THE INVESTIGATION

Determine Basis of Investigation

- Complainant Based or Non-Complainant Based

Complainant Based

- Bona fide complainant
- Subject Property
 - Either currently owned by or being purchased by complainant

Non-Complainant Based

- Audit-based investigation
- Property selection will be based on type of investigation

DESIGNING THE INVESTIGATION

Applicant-Based or Neighborhood-Based Investigation

Applicant-Based Investigation

- Investigation will be tailored to address issues related to protected class status of the applicant/tester
- Isolate protected class(es) that will be basis of investigation

Neighborhood-Based Investigation

- Investigation will be tailored to address issues related to characteristics of people living in the neighborhood
- Determine characteristics of the neighborhood using Census and/or other data

DESIGNING THE INVESTIGATION

Complainant-Based Testing

- Follow up test can be conducted using complainant's subject property
- Complainant serves as one of the test parts (Protected Class)
- Second test part utilizes Control Tester
- Home is shed of Complainant's personal identifying information
- Home is equipped w/ Control Tester's identifying information
- Follow up/second test part need not be conducted by the original appraiser
- Timing is important

DESIGNING THE INVESTIGATION

Applicant-Based Testing

- Testers matched based on protected class characteristics
- Ideally, the same property would be used for both the Protected Class and Control Tester
- Property(ies) selected based on matched characteristics
 - Tax records, Auditor's records, and real estate sites (Zillow, Realtor.com, etc.) can be used to identify and match property characteristics
 - Sq. ft, # of bedrooms, type, # of bathrooms, materials used, amenities, etc.
- Same appraiser/firm might be requested to perform appraisal
- Very difficult to obtain the same appraiser/firm if an Appraisal Management Company (AMC) is used

DESIGNING THE INVESTIGATION

Neighborhood-Based Testing

- Testers matched based on protected class characteristics
- Property(ies) selected based on matched characteristics
 - Tax records, Auditor's records, and real estate sites (Zillow, Realtor.com, etc.) can be used to identify and match property characteristics
 - Sq. ft, # of bedrooms, type, # of bathrooms, materials used, amenities, etc.
 - Neighborhood characteristics
 - E.g. Neighborhood A is 80% White (Non-Hispanic) and Neighborhood B is 80% Black
- Same appraiser/firm might be requested to perform appraisal
- Very difficult to obtain the same appraiser/firm if an Appraisal Management Company (AMC) is used

DESIGNING THE INVESTIGATION

Investigative Activities

- Evaluate appraisal for errors, i.e.. incorrect property address, zip code, sq. footage, and other features
- Compare appraisal information w/ information contained in property records
- Identify comparables for the subject property
 - Online real estate sites – Zillow, Realtor.com, Homefinder, etc.
 - Multiple Listing Service
 - RealQuest – CoreLogic
- Compare available comps to the comps used in the original appraisal
- Interviews with neighbors, real estate agents, Community Development Corporation professionals, and other pertinent witnesses

DESIGNING THE INVESTIGATION

Investigative Activities

- Procure “As-Of-Date” appraisals
 - Trusted appraisers provide an evaluation of the property after the fact
 - 2 – 3 appraisals should be used
 - Compare “As-Of-Date” appraisals to original to identify similarities and differences
 - Use “As-Of-Date” appraisals to flag items that caused devaluation or over-valuation
 - Appraisers can serve as experts if necessary
- Hire trusted appraisal expert to identify problems with original appraisal and to provide opinion about whether the original is appropriate

**J.P. Morgan Chase Bank, N.A., et al.
Conciliation Agreement
A Case Study of a Successful Conciliation
in a Discriminatory Appraisals Case**

Lon D. Meltesen, FHEO Regional Director, Region V
U.S. Department of Housing and Urban Development



Introduction

Sec. 805. [42 U.S.C. 3605] Discrimination in Residential Real Estate-Related Transactions

(a) In General.--It shall be unlawful for any person or other entity whose business includes engaging in residential real estate-related transactions to discriminate against any person in making available such a transaction, or in the terms or conditions of such a transaction, because of race, color, religion, sex, handicap, familial status, or national origin.



Introduction

(b) Definition.--As used in this section, the term "residential real estate-related transaction" means any of the following:

(1) The making or purchasing of loans or providing other financial assistance—

(A) for purchasing, constructing, improving, repairing, or maintaining a dwelling; or

(B) secured by residential real estate.

(2) The selling, brokering, or appraising of residential real property.



Introduction

(c) Appraisal Exemption.--Nothing in this title prohibits a person engaged in the business of furnishing appraisals of real property to take into consideration factors other than race, color, religion, national origin, sex, handicap, or familial status.



Agenda

1. J.P. Morgan Chase Bank, NA. Conciliation Agreement
2. Conciliation Tips and Strategies



Summary of Allegations in the Complaint

- Complainant: African American Homeowner living in a predominately African American neighborhood in Chicago.
- Around May 2020, Complainant sought to refinance her home with J.P. Morgan Chase Bank (Chase).
- Chase denied her refinancing because of the low home valuation in the appraisal conducted in connection with the refinancing.
- Complainant requested Chase reconsider the valuation or order a second appraisal; she felt the appraisal contained errors; Chase refused to reconsider.



Summary of Allegations in the Complaint

- Complainant applied for refinancing with a different lender; race was not disclosed.
- Appraiser for the other lender appraised Complainant's home for a significantly higher valuation than the appraisal for Chase.
- The other lender approved Complainant's refinancing.
- Complainant alleged that Chase rejected her refinancing based on an appraisal which undervalued her property because her home was located in a predominately African American neighborhood, in violation of Section 805 of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Act of 1988.



Timeline

- ***October 14, 2020*** – Complaint is filed with HUD
- ***October 19, 2020*** - HUD served the Notice of Complaint on the Parties
- ***October 20, 2020*** – Case assigned to an Investigator
- ***February 19, 2021*** – Conciliation Agreement is executed with J.P. Morgan Chase Bank (128 days after the filing of the Complaint).



J.P. Morgan Chase Bank

Relief for the Complainant

Monetary Relief - \$50,000.00

Term of the Conciliation Agreement

Three years from the effective date of the Agreement



Relief in the Public Interest: Training

All of Respondent Chase's Home Lending Advisors and Client Care Specialists nationwide will receive additional mandatory training on the Reconsideration of Value ("ROV") process and Fair Lending Issues related to appraisals within the calendar year 2021. The training includes specifics regarding how to handle complaints of discrimination in the appraisal process and the process for customers to submit a ROV request, including the requirement to provide three (3) alternative comparable sales. Respondent Chase will provide the materials to HUD at least thirty (30) days prior to providing the training via email to yana.karnaukhov@hud.gov and R5FHE0Conciliation@hud.gov. Respondent Chase expressly reserves the right to make changes to this training as it deems advisable. For a period of one (1) year after the effective date of this Agreement, Respondent Chase will notify HUD of material changes to this training related to the ROV process via email to yana.karnaukhov@hud.gov and R5FHE0Conciliation@hud.gov.



Relief in the Public Interest: Review of Process

Within thirty (30) days of the effective date of this Agreement, Respondent Chase will re-review the process it follows when customers request a ROV to ensure that customers are appropriately informed of their ability to raise any concerns with the reliability or credibility of their appraisal to Respondent Chase, as well as any concerns of discrimination or bias. Respondent Chase will notify HUD of changes resulting from this review via email to yana.karnaukhov@hud.gov and R5FHE0Conciliation@hud.gov



Relief in the Public Interest: Alert to HLAs

In 2021, Respondent Chase will provide a reminder of best practices regarding the ROV process and how to escalate customer complaints relating to Fair Lending issues to all Home Lending Advisors and Client Care Specialists nationwide. Respondent Chase will provide a copy of this reminder to HUD via email to yana.karnaukhov@hud.gov and R5FHE0Conciliation@hud.gov.



Relief in the Public Interest: Change to Appraisal Transmittal Letter

Within ninety (90) days of the effective date of this Agreement, Respondent Chase will release for coding and implementation revised language for the cover letter accompanying all appraisal reports it sends to its customers to include the following language:

Chase is committed to maintaining appraiser independence and preventing attempts to influence appraisers in the preparation of appraisal reports, as well as avoiding any discrimination or bias in the appraisal process. If you believe that any person has attempted to influence the appraiser in the preparation of the appraisal of your property, or have any concerns with the reliability or credibility of the appraisal, please contact Chase mortgage support by calling 1-855-242-7346 Option "0", Option "0" as soon as possible to report any concerns of discrimination or bias or to discuss your options to contest the reliability of the appraisal.

Respondent Chase will provide HUD with a copy of this revised letter via email to [yana.karnaukhov@hud.gov](mailto: yana.karnaukhov@hud.gov) and [R5FHEOConciliation@hud.gov](mailto: R5FHEOConciliation@hud.gov). Respondent Chase reserves the right to amend the revised letter as it deems advisable. For a period of one (1) year, Respondent Chase will notify HUD of material changes via email to the language via email to [yana.karnaukhov@hud.gov](mailto: yana.karnaukhov@hud.gov) and [R5FHEOConciliation@hud.gov](mailto: R5FHEOConciliation@hud.gov).



Relief in the Public Interest: Changes to Adverse Action Notice

Within ninety (90) days of the effective date of this Agreement, Respondent Chase will release for coding and implementation revised language for the adverse action notice sent to customers if their loan application is denied to include the following language:
Please contact Chase mortgage support by calling 1-855-242-7346 Option "0", Option "0" to report any concerns of improper influence, discrimination or bias during the process of this loan application.

Respondent Chase will provide HUD with a copy of the revised notice via email to yana.karnaukhov@hud.gov and R5FHE0Conciliation@hud.gov. Respondent Chase reserves the right to amend this language as it deems advisable. For a period of one (1) year after the effective date of this Agreement, Respondent Chase will notify HUD of material changes to this language via email to yana.karnaukhov@hud.gov and R5FHE0Conciliation@hud.gov.



Key Concepts of Conciliation

1. To the Extent Feasible
2. An Agreement Subject to the Approval of HUD
3. Shall be Made Public Unless Disclosure is Determined not to be Required to Further the Purposes of the Act
4. Investigator Suspends Fact Finding to Engage in Efforts to Resolve the Complaint by Conciliation
5. Adequately Vindicate Public Interest



Role of the Conciliator

- Separate investigation from conciliation
- Make every effort to separate the two functions
- Conclude any investigation prior to engaging in conciliation
- Take a break and communicate clear transition
- Explain the difference in roles and functions
- Keep a separate and detailed conciliation record
- Keep confidential. Don't commingle.



Conciliation & Confidentiality

1. Prohibition on Use of Information

- Nothing said or done in conciliation can be used
- Conciliation info cannot be made public without consent

2. When” and “role” are imperative

- Note, if information provided in conciliation is discovered outside of the process it is permissible to use.
- Knowing the "when" and "role" is imperative for confronting sources of information



Identify the Issues and the Position of the Parties

1. What are the issues which need to be resolved?
 - Ask open ended questions to find out what is the dispute about?
 - List the issues in neutral terms
 - During the conciliation negotiations seek solutions to the issues



Identify the Issues and the Position of the Parties

2. What are the positions of the disputants?
 - Usually, the positions are articulated first
 - Positions cannot be negotiated
 - Create doubts about the position
 - Understand how the positions came into being



Structuring the Conciliation

Stage I – Setting the Stage

Stage II – Identifying the Issues and Understanding the Parties

Stage III – Problem Solving

Stage IV - Writing the Agreement



Final Takeaways

1. The Chase Conciliation Agreement is not a template but an example of a successful resolution utilizing effective conciliation strategies and tips
2. Tailor each resolution to a specific matter
3. Demonstrate flexibility



QUESTION & ANSWER

Enter questions into the Q&A box

CLOSING

- Slide presentation and recording of this event will be available on HUD Exchange
- Visit the NFHTA website for upcoming events and trainings: www.hudexchange.info/nfhta
- Evaluation and Feedback: Please complete the training survey

[**www.hudexchange.info/nfhta**](http://www.hudexchange.info/nfhta)

THANK
YOU



**National
Fair Housing**
TRAINING ACADEMY