

United States Senate
WASHINGTON, DC 20510

March 10, 2021

The Honorable Lloyd Austin
Secretary of Defense
U.S. Department of Defense
1000 Defense Pentagon
Washington, DC 20301-1000

Dear Secretary Austin:

We are writing to request information on the oversight mechanisms the Department of Defense (DoD) has in place to ensure that military families with disability-related needs receive appropriate housing. In July 2020, the Military Housing Advocacy Network (MHAN) released the findings from a survey of military families that painted a clear and troubling picture of housing problems for thousands of servicemembers and their families, revealing that many military families are being denied access to accessible and adaptable housing.¹

Under the Military Housing Privatization Initiative (MHPI),² the DoD has partnered with private companies that develop and maintain nearly all military housing installations in the country.³ Amid media reports of decrepit housing conditions on military bases,⁴ a staff investigation led by Senator Warren’s office in 2019 revealed that private housing providers were obtaining substantial profits and fees from their contracts but failing to provide military families with the safe, clean, and secure housing conditions that they deserve.⁵ The MHAN survey reveals a new set of problems for military families living in on-base installations operated by these same private housing providers, suggesting that these corporations that have partnered with the DoD may not be following federal laws that protect persons with disabilities.

**Many Military Families Have Disability-Related Needs,
Including Requiring an ADA-Compliant Home or Reasonable Accommodations**

¹ Military Housing Advocacy Network, “Accessibility of ADA Homes and Reasonable Accommodations for Disabled Individuals in Privatized Military Housing,” July 2020, <http://militaryhousingadvocacynetwork.org/wp-content/uploads/2020/07/MHAN-Report-ADA-and-Accomodations.pdf>.

² U.S. Department of Defense, Office of the Assistant Secretary of Defense for Sustainment, “Military Housing Privatization,” https://www.acq.osd.mil/eie/FIM/Housing/Housing_index.html.

³ U.S. Government Accountability Office, Report to Congressional Addressees, “MILITARY HOUSING: DOD Needs to Strengthen Oversight and Clarify Its Role in the Management of Privatized Housing,” March 2020, <https://www.gao.gov/assets/710/705552.pdf>.

⁴ Reuters, “Ambushed at Home: The hazardous, squalid housing of American military families,” <https://www.reuters.com/investigates/section/usa-military/>.

⁵ Letter from Senator Elizabeth Warren to the Senate Committee on Armed Services Chairman James Inhofe and Ranking Member Jack Reed, April 30, 2019, <https://www.warren.senate.gov/imo/media/doc/2019.04.30%20Military%20Housing%20Letter%20to%20SASC%20Chair%20and%20Ranking%20Member.pdf>.

The DoD's Exceptional Family Member Program (EFMP)⁶ is a vital initiative for providing military families with disabilities with necessary services and support throughout the United States and at DoD installations worldwide. Specifically, this program supports its members who have a family member with "a physical, emotional, developmental, or intellectual disorder requiring specialized services so their needs can be considered in the military personnel assignment process," given that families can face additional challenges and disruptions caused by frequent service assignment moves.⁷ As of 2018, around 8% of military dependent family members (a total of 137,000 enrollees) were receiving this support.⁸ A study from the Government Accountability Office (GAO) found that for some residents of private military housing, "accessibility to services for an Exceptional Family Member Program family member played a role in their decision to live in privatized housing versus a rental home in the community."⁹

The availability of services and support for EFMP families varies for each Service¹⁰ and may even vary by assignment location within the same Service.¹¹ This is because "each service (Army, Navy, Marine Corps, and Air Force) is responsible for administering its own EFMP,"¹² and, despite frequent reassignments and disruptive moves, "EFMP enrollment is not portable and servicemembers must register for the program when transferring to a new duty station."¹³ The availability of resources needed by the servicemember at their designated station is supposed to be verified by EFMP offices; if the required resources are not available, then military orders may be modified or even canceled.¹⁴ This includes the provision of Americans with Disabilities Act (ADA) compliant housing and reasonable accommodations¹⁵ for servicemembers with family members with disabilities, which includes but is not limited to military families enrolled in the EFMP.

Military Families with Disabilities Across All Service Branches Report Being Denied an ADA-Compliant Home or Reasonable Accommodations

⁶ 32 C.F.R. Part 75.

⁷ MyArmyBenefits, "Exceptional Family Member Program (EFMP)," [https://myarmybenefits.us.army.mil/Benefit-Library/Federal-Benefits/Exceptional-Family-Member-Program-\(EFMP\)-?serv=122](https://myarmybenefits.us.army.mil/Benefit-Library/Federal-Benefits/Exceptional-Family-Member-Program-(EFMP)-?serv=122).

⁸ Congressional Research Service, "Defense Primer: Exceptional Family Member Program (EFMP)," Bryce H. P. Mendez, January 29, 2020, <https://fas.org/sgp/crs/natsec/IF11049.pdf>.

⁹ U.S. Government Accountability Office, Report to Congressional Addressees, "MILITARY HOUSING: DOD Needs to Strengthen Oversight and Clarify Its Role in the Management of Privatized Housing," March 2020, <https://www.gao.gov/assets/710/705552.pdf>.

¹⁰ U.S. Government Accountability Office, Report to Congressional Committees, "MILITARY PERSONNEL: DOD Should Improve Its Oversight of the Exceptional Family Member Program," May 2018, <https://www.gao.gov/assets/700/691647.pdf>.

¹¹ Congressional Research Service, "Defense Primer: Exceptional Family Member Program (EFMP)," Bryce H. P. Mendez, January 29, 2020, <https://fas.org/sgp/crs/natsec/IF11049.pdf>.

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

¹⁵ A reasonable accommodation is "a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with disabilities to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces, or to fulfill their program obligations." U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, "Reasonable Accommodations and Modifications," https://www.hud.gov/program_offices/fair_housing_equal_opp/reasonable_accommodations_and_modifications.

by Private Military Housing Companies

The MHAN is a nonprofit organization that advocates for military families to make sure that they have access to safe and appropriate conditions in on-base, privatized housing.¹⁶ In July 2020, MHAN released a report on ADA housing issues based on survey responses from military families with disabilities regarding the availability of ADA-compliant homes and obstacles experienced by these families in acquiring those homes or reasonable accommodations.¹⁷ Their responses paint a bleak picture of substandard housing conditions on military installations for military families with disability-related needs.

Of the 100 families surveyed, 89% needed a reasonable accommodation and 85% needed an ADA accessible home.¹⁸ Yet many of these families never received these homes or accommodations and/or waited exceptionally long periods of time before their needs were met.¹⁹ Families reported they were not provided with ADA-compliant homes because they were deprioritized due to their servicemember's low rank or because they already had a home (albeit non-compliant); meanwhile, available ADA-compliant houses were instead provided to incoming families without disabilities or were already occupied by families without disabilities.²⁰ Moreover, families were incorrectly "told their disability is not severe enough to justify an ADA home."²¹ For example, "[o]ne family was told that their child was not blind or in a wheelchair, so they did not qualify."²² In many cases, families were asked by the housing company that runs their military installation to provide extensive documentation proving that they have a disability – "a violation of a disabled individuals' rights and extremely invasive for families."²³

Moreover, 50% of families that did acquire ADA-compliant houses reported that they were missing accessibility features – "including but not limited to, proper flooring, ramps, grab bars, and properly sized doorways/hallways" – which were not adequately addressed by the housing company after a maintenance request was submitted, according to 68% of respondents.²⁴ Twenty percent of families reported that they were charged for their accommodations by their housing provider, and 46% reported that they were outright denied accommodations.²⁵

Following the release of this initial report, MHAN has continued to collect responses to this survey from military families with disabilities, which they have shared with us. From these responses, we have found:

¹⁶ Military Housing Advocacy Network, <https://militaryhousingadvocacynetwork.org/>.

¹⁷ Military Housing Advocacy Network, "Accessibility of ADA Homes and Reasonable Accommodations for Disabled Individuals in Privatized Military Housing," July 2020, <http://militaryhousingadvocacynetwork.org/wp-content/uploads/2020/07/MHAN-Report-ADA-and-Accomodations.pdf>.

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Id.*

²² *Id.*

²³ *Id.*

²⁴ *Id.*

²⁵ *Id.*

- **Problems obtaining ADA-compliant housing.** Of the 111 military families that required an ADA home due to a disability, 59% said their ADA home was not readily available when they arrived to their duty station, and 79% said they had challenges getting into an ADA home; more than half (51%) of respondents reported that there was no housing available, and 19% of respondents reported they were put on a waitlist for an ADA compliant home. The average reported wait time for an ADA home placement was 125 days; one family said they have needed an ADA home for 13 years and have yet to receive one across three different installations during that time.
- **Inappropriate or illegal challenges facing families in need of ADA-compliant housing.** Of those respondents with disability-related needs seeking housing, nearly one in ten (8.1%) reported that they had their health issues challenged and minimized by the housing management company, including one family that was told their health issues “were not a good enough reason” and another that was told they “didn’t need it, they were fine.” Other families report that they were denied housing, being told by the housing company to “move somewhere else” or to find an ADA home themselves. Survey respondents also reported the housing process as burdensome and “outrageous,” entailing an extensive amount of paperwork that required “an uncomfortable amount of information” pertaining to their health status.
- **Barriers to the provision of reasonable accommodations for families in need.** Over half of respondents (52%) said that housing did not accommodate their request for a reasonable accommodation. Of the 107 military families that required reasonable accommodations due to a disability, 46% said their ADA home was missing accessibility features required for their family, and 78% of these respondents said housing companies did not respond in a timely manner to requests for compliance. Even when they did receive accommodations, 15% of families said that they were charged for them, and many faced long wait times: the average wait time for approval was 123 days, and the average wait time for completion of accommodation requests was 134 days.

These survey results suggest that private military housing providers that own and operate installations across all four Services may not be complying with federal laws that protect Americans with disabilities.

Denying or Delaying ADA-Complaint Homes or Reasonable Accommodations for People with Disabilities Violates Federal Law

There are several federal laws that provide broad protections for individuals with disabilities. The ADA is meant “to provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities” and to ensure “that the Federal Government plays a central role in enforcing...standards...on behalf of individuals with disabilities.”²⁶ Section 504 of the Rehabilitation Act²⁷ directs that “[n]o otherwise qualified individual with a disability in the United States ... shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination

²⁶ 42 U.S.C. 12101.

²⁷ 29 U.S.C. 794.

under any program or activity receiving Federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service,”²⁸ including the Department of Housing and Urban Development (HUD) and DoD.

Housing nondiscrimination laws include the Fair Housing Act (FHA),²⁹ which “prohibits discrimination in housing and housing-related transactions because of disability,”³⁰ “requires owners of housing facilities to make reasonable exceptions in their policies and operations to afford people with disabilities equal housing opportunities,”³¹ and “makes it unlawful to refuse to make reasonable accommodations to rules, policies, practices, or services when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling and public and common use areas.”³²

The FHA, Section 504, and Titles II and III of the ADA “require housing providers to make reasonable accommodations and reasonable modifications for individuals with disabilities,”³³ which, according to the FHA, includes “a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises.”³⁴ Additionally, “[t]hese laws also “prohibit housing providers from refusing residency to persons with disabilities, or placing conditions on their residency, because they require reasonable accommodations or modification.”³⁵

According to HUD, “the requirement to provide reasonable accommodations and modifications applies to, but is not limited to individuals, corporations, associations and others involved in the provision of housing or residential lending” including property owners and housing managers.³⁶ HUD also states that “a provider has an obligation to provide prompt responses to reasonable accommodation requests” and that “[a]n undue delay in responding to a reasonable accommodation request may be deemed to be a failure to provide a reasonable accommodation.”³⁷ Moreover, “[u]nder Section 504, a housing provider is required to provide and pay for the structural modification as a reasonable accommodation unless it amounts to an undue financial and administrative burden or a fundamental alteration of the program.”³⁸

²⁸ *Id.*

²⁹ 42 U.S.C. 3601.

³⁰ U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, Disability page, https://www.hud.gov/program_offices/fair_housing_equal_opp/disability_main.

³¹ U.S. Department of Justice, Civil Rights Division, Disability Rights Section, “A Guide to Disability Rights Laws,” February 2020, <https://www.ada.gov/cguide.htm#anchor63409>.

³² U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, “Reasonable Accommodations and Modifications,” https://www.hud.gov/program_offices/fair_housing_equal_opp/reasonable_accommodations_and_modifications.

³³ U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, “Reasonable Accommodations and Modifications,”

https://www.hud.gov/program_offices/fair_housing_equal_opp/reasonable_accommodations_and_modifications.

³⁴ *Id.*

³⁵ *Id.*

³⁶ *Id.*

³⁷ *Id.*

³⁸ *Id.*

Furthermore, the DoD issued a memorandum in 2008 clarifying requirements “to make its facilities accessible to persons with disabilities” and updating DoD standards toward this effort.³⁹ This memorandum “describes the manner in which facilities designed, constructed (including additions), altered, leased, or funded by the Department of Defense (DoD) are to be made accessible to people with disabilities.”⁴⁰ It specifies that “[t]he types of facilities to which these DoD standards apply include, but are not limited to...[a]ll housing, including military family housing and unaccompanied personnel housing,” and that the DoD “shall require as part of the joint venture agreement in all public-private ventures which include facilities, including privatized housing, that those facilities be designed and constructed in accordance with these DoD standards,”⁴¹ and comply “with any applicable provision of law and regulation which may include” the Fair Housing Act, the ADA and the FHA.⁴²

Private Military Housing Companies Are Not Adequately Addressing Accessible Housing and Accommodations Needs

In order to obtain additional information on the concerns raised by the MHAN survey, we wrote to Balfour Beatty Communities, Corvias Property Management, Hunt Military Communities, Lendlease Communities, and Lincoln Property Company on December 22, 2020, seeking information on their policies and procedures for providing such housing.⁴³ The responses from these companies that own and manage thousands of on-base military housing units did not provide all of the information we sought, but they did reveal a series of concerns about providing accessible housing and accommodations to military families and the companies’ interpretation of federal laws pertaining to disabled servicemembers.⁴⁴

First, the companies indicated that a relatively small number of accessible homes were being built on-base. Specifically, they indicated that, “For new construction homes built under MHPI ... generally the percentage agreed to by DoD was 5% of such new construction homes.”⁴⁵ Several companies indicated that they exceeded this standard over their entire portfolio – but only one company provided this information on a per-installation basis, and that information indicated more than 75% of the facilities they manage did not meet that standard.⁴⁶ This company indicated that only 4.3% of their MHPI housing units were ADA-compliant.

In addition, we are troubled that at least one of the MHPI providers indicated that they were not subject to all federal disability laws. One company wrote that it “has received advice from

³⁹ Memorandum from the Deputy Secretary of Defense, “Access for People with Disabilities,” October 31, 2008, https://www.wbdg.org/FFC/DOD/dod_memo_aba.pdf.

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² *Id.*

⁴³ Office of Senator Elizabeth Warren, “Warren, Tillis Question Private Military Housing Providers on Reports They Have Denied Access And Failed to Provide Appropriate On-Base Housing to Military Families With Disabilities,” press release, December 22, 2020, <https://www.warren.senate.gov/newsroom/press-releases/warren-tillis-question-private-military-housing-providers-on-reports-they-have-denied-access-and-failed-to-provide-appropriate-on-base-housing-to-military-families-with-disabilities>.

⁴⁴ Letters from these military housing providers are filed in the Offices of Senators Elizabeth Warren and Thom Tillis.

⁴⁵ *Id.*

⁴⁶ *Id.*

legal counsel that its MHPI projects are not covered by Section 504 on the basis that they do not ‘receive financial assistance from any federal agency’ as such term has been interpreted under applicable case law,” and that “to our knowledge, there is no requirement that [our company] certify under any of its MHPI project agreements that it will be compliant with the non-discrimination obligations of Section 504 as a condition of receipt of the contract or funding – which is another indicia of governmental intent for application of Section 504.”⁴⁷ Moreover, this company stated that it does not believe it is obligated under Section 504 to make reasonable modifications at no cost to the tenant since it “does not receive specific HUD-funding for its MPHI projects” and that “the mere fact that there is a delay in the assignment of an ADA housing unit is not indicative of a violation of law.”⁴⁸

Finally, most of the MHPI providers indicated that they are not collecting information that would help them keep track of disability-related needs across their portfolios. For example, they would not or could not tell us how many ADA-compliant homes are actually occupied at any given time by families with disability-related needs, the average waiting times for approval or accommodation request completions on their installations, how many families were required to pay for their own accommodations, or how many housing complaints were filed by families with disabilities. Without this information, it is difficult to imagine how the DoD can possibly conduct oversight and ensure these MHPI companies are compliant with disability statutes on their installations.

Questions

In addition to running the EFMP program, the DoD is responsible for ensuring “that eligible personnel and their families have access to affordable, quality housing facilities and services consistent with grade and dependent status and generally reflecting contemporary community living standards”⁴⁹ and “is committed to ensuring that privatized housing tenants (military service members and their families) receive quality housing and fair treatment from the Military Housing Privatization Initiative project owners that operate and maintain privatized housing.”⁵⁰ Oversight of privatized military housing is the responsibility of the Military Departments for each Service – delegated by the DoD and under the authority of the Assistant Secretary of Defense for Sustainment.⁵¹

The investigation that Senator Warren’s office released in 2019 revealed significant problems with DoD oversight, and the new findings from the MHAN survey indicate that these DoD oversight failures are having a particularly harmful effect on military families with disabilities that require ADA-compliant housing and other fair housing protections.

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ U.S. Department of Defense, “DoD Manual on Housing Management,” October 28, 2010, <https://www.acq.osd.mil/eie/Downloads/Housing/App%20H%20-%20DoD%20Housing%20Manual%20-Oct%202010.pdf>.

⁵⁰ Air Force, “Military Housing Privatization Initiative Tenant Bill of Rights,” <https://www.housing.af.mil/>.

⁵¹ U.S. Government Accountability Office, “MILITARY HOUSING PRIVATIZATION: Preliminary Observations on DOD’s Oversight of the Condition of Privatized Military Housing,” December 3, 2019, <https://www.gao.gov/assets/710/702950.pdf>.

In order to better understand why military families with disability-related needs are not receiving ADA-compliant homes or reasonable accommodations, we request answers to the following questions no later than March 24, 2021:

1. Please provide the following information, for each DoD installation with MHPI housing in place, for calendar years 2018, 2019, and 2020:
 - a. How many EFMP-enrolled families live at each installation? How many families at each installation have requested ADA-housing?
 - b. How many ADA-compliant housing units are in place at each installation? What percent of the housing units on each installation are ADA-compliant?
 - c. How many of the available ADA-compliant homes on each installation are currently occupied by families with disability-related needs?
 - d. What is the protocol for an EFMP family that is either moving to each base or already on-base and in need of an ADA home or accommodation?
 - i. How are military families informed about the availability of such housing on this installation?
 - ii. Who coordinates this communication?
 - iii. If such housing is unavailable, what is the protocol for the MHO and EFMP office once an accessible home becomes available?
 - iv. What is the average wait time for families on each installation before they successfully move into a home that meets their needs?
 - e. According to each of the private military housing companies, they maintain a waitlist for families in need of accessible housing when none are available.
 - i. Do on-base MHO and EFMP offices have access to this information?
 - ii. How many families with disabilities are on the waitlist for a housing unit on each installation?
 - iii. What is the average amount of time they spend on the waitlist before being provided with adequate housing?
 - iv. How many military orders have been modified or canceled due to unavailable housing on this installation in the past year?
 - f. How many families at each installation have requested modifications to housing so it is ADA-compliant?
 - i. Does the MHO and EFMP office on each base have access to this information?
 - ii. How many of those families received the requested accommodations?
 - iii. What was the average waiting time for approval of accommodations on each base?
 - iv. What was the average waiting time for completion of accommodations on each base?
 - v. Were any of the families required to pay for their own accommodations or required to pay to return the home back to its original condition upon move-out?
 - g. What specific mechanisms are in place for military families to resolve disputes with MHPI housing providers?

- h. How many military housing officials and Military Tenant Advocates are present at each installation to perform privatized housing oversight and mediate disputes between servicemembers and the private housing partner?
 - i. In the most recent fiscal year, how many complaints were received by the MHO or EFMP office regarding housing needs for families with disabilities at each installation?
 - i. Please provide a summary of the number and type(s) of complaint(s).
 - ii. How many of these were resolved?
 - iii. What was the average time required to resolve a case?
 - j. Please provide a detailed list of all cases where private housing providers have been fined or sanctioned for problems related to housing for military families with disabilities. For each instance, please provide information on the location, the housing provider, the amount of the fine or other sanction, and the reason for the fine or sanction.
 - k. Please provide a detailed list of all cases of requests for waivers, modifications, or exemptions from DoD standards for military families with disabilities. For each instance, please provide detailed information on the nature of the request, the requester, and whether the request was granted.
2. The Office of Special Needs (OSN)⁵² establishes DoD policy to support military families with disabilities.⁵³ What specific resources – from OSN or elsewhere – are provided to families so that they understand their rights regarding fair housing?
 - a. How is this information disseminated and standardized across all the Departments?
 - b. What resources are made available to military families regarding family moving needs?
 3. The MHAN report revealed that military families with disabilities are being asked to repeatedly prove their disability needs through documentation with each EFMP office at each military installation.
 - a. Why is this DoD policy in place?
 - b. Is there a centralized database where this information can be safely stored that follows families regardless of moves? If not, can DoD create such a database using its current statutory authority?
 - c. How does each EFMP office coordinate with the private housing company on their installation to prevent those companies from requiring excessive and burdensome medical documentation for families with disabilities?
 4. Many families report long waitlists for ADA-compliant houses or are outright denied houses because there are none available, but it is DoD policy⁵⁴ that 5% of

⁵² 10 U.S.C. 1781c.

⁵³ Congressional Research Service, “Defense Primer: Exceptional Family Member Program (EFMP),” Bryce H. P. Mendez, January 29, 2020, <https://fas.org/sgp/crs/natsec/IF11049.pdf>.

⁵⁴ U.S. Access Board, “Architectural Barriers Act (ABA) of 1968,” <https://www.access-board.gov/law/aba.html>.

houses on each military installation be ADA accessible or easily modifiable for accessibility.⁵⁵

- a. Who is responsible for ensuring that private companies participating in the MHPI program build the required number of ADA-compliant houses on each installation?
 - b. What are the consequences, if any, for an MHPI company that does not do so? Have there been any such sanctions to date? If so, please provide a detailed list of these fines or other sanctions.
 - c. Who within the Military Departments is responsible for tracking this ADA-housing waitlist?
 - d. Is information about the waitlist shared with HUD?
5. The FY21 NDAA mandated that all EFMP functions be centralized in a headquarters office for each Service and at each installation. Is housing included in this centralization mandate? Do the Services need specific housing liaisons? If so, are they needed at the headquarters level or at installations with a large population of EFMP dependents?
 6. How do EFMP offices determine what housing resources are available at each installation, and where do they store this information? Who ensures that EFMP offices are modifying and canceling military orders for military families with disabilities when they are being ordered to move to a location that lacks the housing resources that they need? Do EFMP offices communicate with one another when a military family with disability-related needs is moving from one installation to another? Are any performance metrics for each of the EFMP offices collected? Please provide any analysis of such metrics from the last five years.
 7. Are the private military housing companies that manage and facilitate privatized military housing classified as federally financed companies? Are these MHPI companies covered by Section 504 of the Rehabilitation Act?
 8. What specific DoD oversight procedures are in place to ensure that private military housing contractors are meeting contractual obligations with regard to the rights of people with disabilities, including the Fair Housing Act, ADA, and Section 504? Does the DoD have reasonable assurances that MHPI partners are complying with contractual requirements and federal and state laws?
 9. How often does each Military Department review private partner records to ensure compliance with applicable federal and state laws? How often do the Services schedule and conduct inspection visits to military installations? How often are all installations inspected? Are housing offices warned in advance or are there surprise

⁵⁵ Military Housing Advocacy Network, “Accessibility of ADA Homes and Reasonable Accommodations for Disabled Individuals in Privatized Military Housing,” July 2020, <http://militaryhousingadvocacynetwork.org/wp-content/uploads/2020/07/MHAN-Report-ADA-and-Accommodations.pdf>; Military One Source, “Understanding Accessible Housing: The Fair Housing Act,” April 10, 2020, <https://www.militaryonesource.mil/family-relationships/special-needs/support-for-families/understanding-accessible-housing-the-fair-housing-act/>.

inspections? If the latter, how frequently do these occur and what installations are targeted?

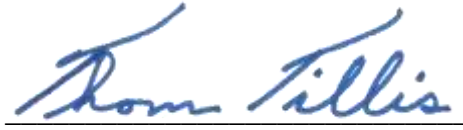
As you take the helm of the DoD, we hope you will address the ongoing concerns about the administration of the MHPI program.

Thank you for your attention to this important matter, and we look forward to your response.

Sincerely,



Elizabeth Warren
United States Senator



Thom Tillis
United States Senator

Cc: The Honorable John Whitley
General James McConville
The Honorable John Roth
General Charles Q. Brown
The Honorable Thomas Harker
Admiral Mike Gilday
General David Berger