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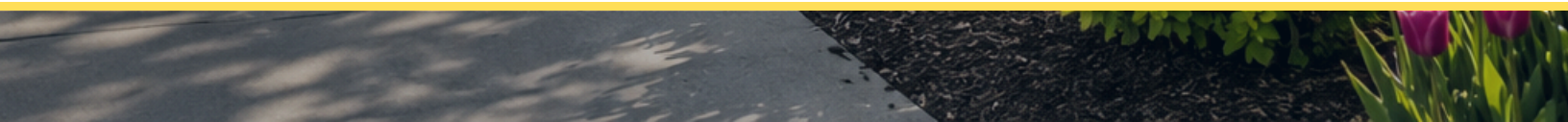


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PRESIDENT'S MESSAGE

As community association professionals and volunteer leaders, much of our work requires us to balance the immediate needs of our communities with their long-term financial, operational, and regulatory responsibilities. This edition of our chapter publication reflects that balance and highlights the value of remaining informed, connected, and prepared.

The recent updates involving Fannie Mae and Freddie Mac are an important reminder that decisions made at the association level can affect more than day-to-day operations. Reserve funding, insurance coverage, building conditions, deferred maintenance, and governing practices may also influence financing opportunities and property values. Staying current on evolving lending requirements allows boards and managers to identify potential concerns before they become obstacles for owners and prospective purchasers.

This issue also examines the difficult cycle created when associations focus primarily on keeping assessments low. Although minimizing increases may be popular in the moment, consistently underfunding operations and reserves can lead to deferred projects, larger special assessments, and fewer options when urgent repairs arise. Responsible budgeting is not simply about controlling expenses; it is about ensuring that a community has the resources necessary to maintain its property and fulfill its obligations.

Seasonal planning is another essential part of community stewardship. The discussion of spring landscaping offers timely guidance for maintaining attractive, healthy, and sustainable grounds. Thoughtful planning, clear expectations, and effective communication with contractors can help associations maximize their landscaping investment while avoiding preventable challenges.

Communication and teamwork are equally important. The “Birds of a Feather” article explores how individuals with different roles, experiences, and perspectives can work toward a shared purpose. Successful communities depend on collaboration among board members, managers, business partners, committee members, and homeowners. We may not always agree on every detail, but respectful communication and a commitment to common goals allow us to move forward productively.

This quarter also provides an opportunity to reflect on several successful chapter events. Our golf outing and networking gathering brought members together to strengthen professional relationships, exchange ideas, and enjoy time with colleagues outside of our regular educational programs. These events remain an important part of the chapter experience, and their success is made possible through the support of our attendees, sponsors, volunteers, and business partners.

Finally, this issue addresses recent federal guidance involving assistance animals. Fair housing questions can be complex and fact-specific, making it important for community association leaders to understand the applicable guidance, follow a consistent review process, and seek qualified advice when necessary.

Thank you for your continued involvement in CAI Wisconsin. Whether you participate through educational programs, networking events, committee service, sponsorship, or simply by sharing your experience with another member, your engagement strengthens both our organization and the communities we serve.

I hope you find this issue informative and useful, and I look forward to seeing you at an upcoming CAI event.

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Lawrence J. Robe III

CAI-WI President

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Fannie Mae & Freddie Mac Lending Requirements Update:

New Reserve Study Requirements

by Amy Peterselli – Kaman & Cusimano, LLC

On March 18, 2026, Fannie Mae issued a lender notice addressing three significant changes affecting condominium associations. According to Fannie Mae, these changes are intended to address the correlation between underfunded reserves and the need for critical repairs. Despite the increasing challenges associations already face from rising insurance premiums, Fannie Mae is moving forward with these new additional restrictions and requirements:

- 1) Elimination of the limited review process for associations with more than 10 units
- 2) Increased reserve requirements
- 3) Updated insurance requirements

1) Limited review process

The limited review process, which used a shorter lender questionnaire, will be retired and no longer available after August 3, 2026. In its place, lenders will require more extensive documentation and longer questionnaires. As a result, associations should expect the lending review process to require more time and administrative effort.

2) Reserve requirements

Fannie Mae previously required associations to allocate 10% of their annual budgets to reserves. It increased that requirement to 15%, effective January 2027. An association may qualify for an exception if it has obtained a reserve study and the study shows that reserves are adequately funded. Under the new guidance, “adequately funded” means the association is contributing at the highest level recommended by the reserve study. Baseline funding, also referred to as cash flow analysis, will no longer be considered sufficient because it allows reserve balances to approach, but not fall below, zero.

3) Insurance requirements

Fannie Mae is requiring insurance coverage equal to at least 100% of the association’s replacement value. The lender may rely on insurance coverage policies, insurance risk appraisal, replacement cost value estimate, and other documents, to verify coverage is sufficient. Furthermore, roofs are not required to be insured at full replacement cost. This conflicts, however, with the Wisconsin statutory requirements for all-in, full-replacement coverage. Additionally, inflation guard coverage is no longer required, which helps cover costs incurred due to rising inflation rates. Lastly, there is a \$50,000 maximum per-unit deductible for master policies. Most associations in Wisconsin currently do not have a per-unit deductible, but for those that do, additional unit owner insurance requirements apply.

Amy Peterselli is an Attorney at Kaman & Cusimano, LLC.

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Driving Your Association Into the Ditch:

The Vicious Cycle of “Keeping Fees Low”

Nik Clark, ©2024

“We have a great board of directors. We haven’t had a fee increase in years.”

With this perspective, shared by a unit owner at a recent industry event, we see a critical mistake so many association boards make. In a desire to keep fees from going up, many association boards set a course that will steer their association straight into the ditch.

Costs increase. This is an irrefutable fact of any modern economy. If your association fees have not increased AND have not increased in a substantive way, your association is likely headed into a vicious cycle that will require painful intervention to break.

HOW DOES IT BEGIN?

An association has annual operating expenses they incur every year. This includes things like mowing, utilities, cleaning, trash removal, insurance, and other costs required to maintain daily operations. These expenses, which will eventually increase even after intense cost-conscious bidding and negotiating, must be funded annually or they will not be received. Thus, “keeping fees low” necessitates either abandoning those expenditures (at the cost of the appearance and performance of the association) or reallocating money intended for other purposes.

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Driving Your Association Into the Ditch: The Vicious Cycle of “Keeping Fees Low”

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Pop Quiz: “Where, within an association budget, can a board reallocate money to cover increasing annual expenditures without raising association fees?” If you said, “Cut back on RESERVE FUNDING!”, you’ve played this game before! While I haven’t done the statistical analysis, anecdotally, I’m willing to bet that 80% of all associations have made this very decision. (Note: If someone undertakes an actual statistical analysis, “bet the over” with respect to the real percentage.) Most associations have chosen to underfund their reserve in order to “keep fees low” today. The roof, the siding, the parking lot...those expenditures only come up once every 20+ years. You can kick that can down the road for many budget cycles before “it” hits the fan.

All the motivation is there: “We have unit owners on a fixed income.” “We want to keep fees low to help units sell”. “I just don’t want unit owners mad at me!” This is how it begins.



THE VICIOUS CYCLE:

Operating costs increase over time, so the Association Board under funds reserves to “keep fees low” – everyone is happy.

Because of underfunding, the reserve fund is inadequate to fund major capital projects (roof) in a timely manner.

The association defers roof replacement because they didn’t have enough money, and a special assessment wouldn’t be popular. NOT everyone is happy! Some unit owners who bought into well-maintained and/or like-new condition condos do not want to sacrifice the appearance and performance of their property just to save some nominal fee increases. Smart, well-funded owners see the writing on the wall and put their units up for sale. The eventual buyers of listed units, by the very nature of the reality on the property, will be people who are willing to sacrifice property appearance for lower assessments. The property had some deferred maintenance, BUT the price was right, and the fees were low, so they bought.



The association ends up with some unexpected expenses for water damage from roof leaks. Roofs are finally replaced 5 years later than they should have been, spending more to re-deck the roofs due to water damage. DISASTER AVERTED? NO! The siding is now looking really bad, but the association doesn’t have the reserve funds to replace it. That’s OK! We’ve played this game before. DEFER SIDING replacement. It’s only aesthetics! But now MORE people are unhappy.

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Driving Your Association Into the Ditch: The Vicious Cycle of “Keeping Fees Low”

CONTINUED...

SPIRALING OUT OF CONTROL:

The property is in trouble. They scraped together enough money to replace roofs (later than they should have) but the reserve fund is severely depleted. The siding looks terrible, and the property now has a significant deficit in “curb appeal” but they aren’t in a great place to remedy the situation. A special assessment would not be well received. When it came up at a board meeting, the board members were afraid of making it back to their unit safely. The board Treasurer who saw this coming resigned. He/She doesn’t need the stress. The board, trying to be compassionate to unit owners who are on fixed incomes and very sensitive to fee increases, cuts back on operating costs to try to funnel money into the reserve. They extend the painting cycle. Property condition deteriorates even more. Over the past few years, the well-funded owners saw what was coming and moved out.



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Unit sales prices declined significantly. Sellers took a hit because the property was now in poor condition, but they were relieved to get out of their unit. Any money they saved in lower association fees was negated by either seeing their investment fail to increase or worse yet, decline in value. Incoming unit owners are now EXTREMELY cost conscious, attracted to a lower sale price and lower fees to purchase a condo in a formerly sought-after association. They were eager to get into a unit for a “steal” and they could swing the low association fees as well. These new unit owners will have a difficult time affording the “true” cost of living in their association, not to mention the cost of making up for 20+ years of underfunded reserve contributions.



For all the effort to “keep fees low,” the association has driven itself into the financial ditch. They were not frugal or fiscally responsible. They followed the path of least resistance and made a series of bad decisions (with the best of intentions), each of which made the financial situation worse and made the remedy more unattainable. The people who could have, and should have, contributed appropriately to fund reserves left new unit owners who tended to be more cost-sensitive (willing to accept a less attractive property because the “fees were low”) with a double whammy:

Continued on next page...

Driving Your Association Into the Ditch: The Vicious Cycle of “Keeping Fees Low”

CONTINUED...

The cost to maintain a property PLUS the cost to make up for 20+ years of underfunded reserves. Congratulations, board of directors! Your decisions, over time, resulted in a community full of residents who could not afford the true cost of living there. Most associations survive. Some do not. The properties that survive have a painful recovery that typically involves special assessments, bank loans, and large fee increases, but few return to their original glory. It didn't have to be that way.

While a board can do its due diligence with vigorous bidding and negotiation of annual expenditures to ensure fee increases are not excessive, stable, and equitable, planned fee increases should not be avoided. Proper reserve funding ensures your association will remain a sought-after property for generations to come.

With the exception of construction defect issues and lengthy developer construction timelines (See Transition Defect Study and/or Retrospective Reserve Study), all associations start their journey in mint condition on sound financial footing. Notwithstanding legacy “drive-by boilerplate reserve studies,” a quality detailed reserve study from an experienced provider is the first step to ensuring financial solvency *and* prosperity for your association. A quality reserve study is not a foregone conclusion. Boilerplate-type reserve studies give associations reason to question the results of the study which opens the door to inaction. Example: “The reserve provider didn't even go up on the roof, how can they say it will only last 15 more years?” Start with a quality reserve study in which you can trust the results. With every year that goes by without proper funding of reserves, your association increases the risk of falling into the vicious cycle described above.

EYES WIDE OPEN:

An association that properly funds the reserve fund from the beginning will give current and future unit owners an accurate financial picture of what it truly costs to live in an association. In addition, as a result of having a quality reserve study, a board will be able to communicate to unit owners exactly what the fee schedule will look like for the next 5 years (the average useful life of a reserve study before an update is conducted). Proper reserve funding ensures that adjustments to the association fee schedule after a reserve study update will be minimal.

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THE VIRTUOUS CYCLE:

In contrast to the above (all-too-common) scenario is an association that understands that “keeping fees low” should never be the primary goal of the board of directors.

Continued on page 18...

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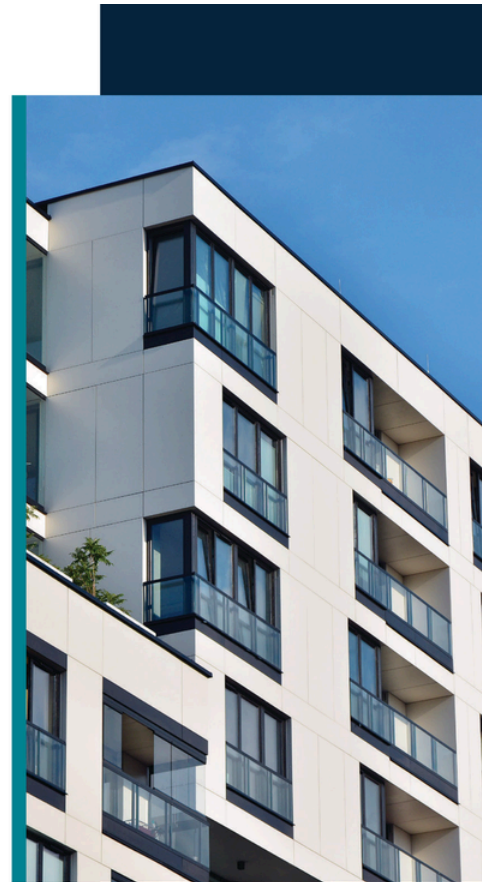
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Being new, the property is in top condition. A unit owner who, unfortunately, finds the monthly assessments difficult to afford will realize it very quickly and could sell their like-new unit, maximize the sale price, and purchase a more affordable (for them) home. Prospective buyers will purchase a unit that is in like-new condition with eyes wide open with respect to the true cost to live there and the planned inflationary assessment increases.

HAVE YOUR CAKE AND EAT IT TOO:

The association is properly funded. The need for special assessments is virtually eliminated. Everyone who lives in the association understands the true cost of living there. Everyone is paying “a little more” than an association that is not funding their reserve, but they are enjoying a property that is in top condition. They enjoy the pleasing aesthetic value and performance of properly maintained buildings. Their guests who visit see a beautiful property with great curb appeal. They minimize issues (and costs) from water infiltration and asset failure. That is ‘worry-free’ living! When the time comes for select unit owners to sell, they will get TOP dollars for their units. They enjoyed a great-looking property the entire time they lived there, and they were rewarded for it by getting that money back in the form of a highly appreciated value of their unit on sale. They had their cake and ate it too.

Your association will attract the kind of buyers you want in the property: well-funded unit owners who wanted a property in top condition and were willing to pay for it. Prospective buyers seeking “low condo fees,” thankfully, looked elsewhere.

When the time comes for planned projects, the association has the funds to conduct roof replacements, siding replacements, and parking area replacements as needed and without having to defer and sacrifice performance or aesthetic appeal. Everyone is happy. The virtuous cycle continues. Properly fund reserves, conduct projects in a timely manner, enjoy the beautiful property every day, and get rewarded with higher and higher unit sale prices. Who would choose to do it any other way?

If your association is not properly funding the reserves, you will suffer the consequences. You cannot escape the consequences of underfunded reserves. You do not save money by underfunding reserves and “keeping fees low.” You are not doing unit owners a favor by misrepresenting the true cost of living in an association and devaluing their most valuable asset with deferred maintenance. That is not compassionate. If you don’t fund your reserves, you will pay for it through future special assessments, a lower sale price when you sell your unit, or both. Why not have your cake and eat it too?

About the author: Nik Clark is the President and Partner at Superior Reserve Engineering & Consulting. Nik has over 20 years of experience with community associations having held executive positions with a prominent legacy firm in the reserve study industry before founding Superior Reserve in 2014 to address the shortcomings of “boilerplate” and “drive-by” reserve studies. Over the past 20+ years, Nik has partnered with property managers, developers, association boards, and many other real estate fiduciaries to bring industry-leading long-term capital reserve planning, transition, and related consulting services to all types of real estate. As a featured speaker and panelist at hundreds of industry conferences and trade shows around the country, Mr. Clark has been a resource for managers, real estate executives, and properties in all 50 states and 36 countries. www.superiorreserve.com



ANNUAL GOLF OUTING

Thank you for an incredible 2026 CAI Wisconsin Golf Outing!

What an incredible day at The Legend at Merrill Hills! The 2026 CAI Wisconsin Golf Outing was another tremendous success, and we are grateful to everyone who helped make this year's sold-out event one to remember.

A special thank you to Paul Davis, our event sponsor, for your generous support and commitment to the event.

We would also like to extend our sincere appreciation to all our business partners who sponsored holes, raffle prizes, food, beverages, contests, and so much more. Your generosity helps create one of the most anticipated and enjoyable networking events of the year, and we couldn't do it without you.

This year, the weather couldn't have been better, providing the perfect backdrop for a fantastic day of golf, networking, and fun.

Thank you to the outstanding staff at The Legend at Merrill Hills for your hospitality and for helping everything run smoothly throughout the day.

Finally, a heartfelt thank you to the CAI Wisconsin Golf Committee. Your countless volunteer hours planning, organizing, setting up, and coordinating the outing are what make this event such a success year after year.

If you weren't able to attend or if you'd like to relive some of the highlights, be sure to check out CAI Wisconsin's social media pages for photos from this amazing day!

Thank you again to everyone who participated, sponsored, volunteered, and supported this event. We look forward to seeing you next year!

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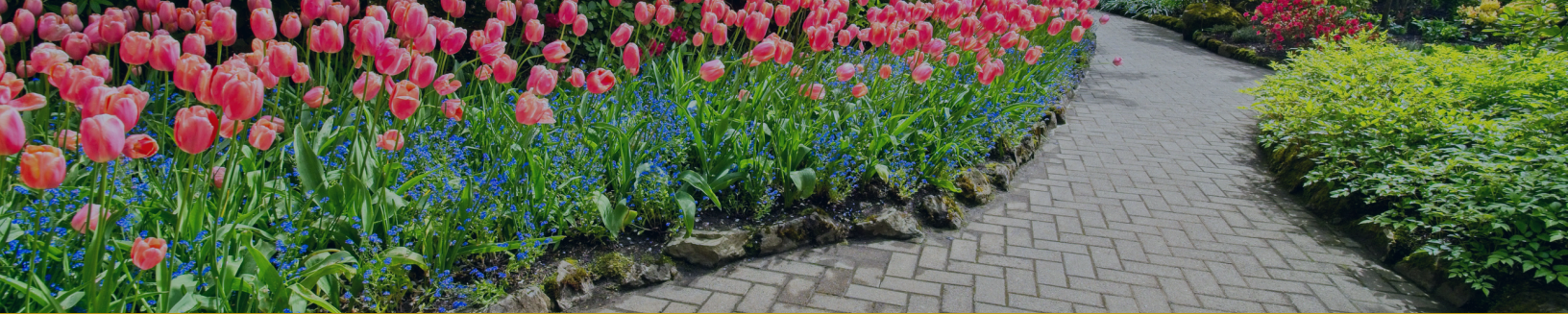
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Spring Landscaping and Maintenance: A Fresh Start for Your Community

By Daniel Brannigan

Spring is the perfect time for community associations to reset after winter and prepare for the year ahead. For homeowners, it means greener spaces and improved curb appeal. For boards, it's a critical window to inspect, plan, and prevent bigger problems down the road.

Why Spring Matters

Freeze-thaw cycles, salt, plows, and heavy storms can take a toll on turf, beds, irrigation components, and hardscape. Spring is when those impacts become visible, making it the most practical time to evaluate what needs attention, coordinate business partners, and complete repairs while conditions are favorable.

What Homeowners May See This Season

Spring landscaping and maintenance often include:

- Cleaning up debris and trimming trees and plants
- Inspecting and repairing irrigation systems
- Replacing winter-damaged landscaping
- Checking sidewalks, drainage areas, and lighting



Beyond day-to-day enjoyment, these projects influence how the neighborhood presents itself — and how well shared assets hold up over time.

Landscaping is More Than Curb Appeal

Today's communities focus on smart, sustainable landscaping. That may mean:

- Using plants suited to the local climate
- Improving irrigation efficiency
- Reducing water waste and long-term maintenance costs

These decisions help communities balance appearance, budgets, and environmental responsibility.

Continued on page 27...



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Spring Landscaping and Maintenance: A Fresh Start for Your Community

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The Board's Role in Spring Maintenance

Spring is also planning season for boards and community managers. Key responsibilities include:

- Reviewing landscape contracts and service scopes
- Confirming business partners are meeting expectations
- Scheduling inspections and preventive maintenance
- Communicating clearly with homeowners about upcoming work

Many boards rely on landscape or maintenance committees to help evaluate needs and make recommendations.

Preventive Maintenance Pays Off

Proactive maintenance protects more than landscaping. It supports safety, reduces emergencies, and helps communities remain attractive to buyers, lenders, and insurers. Small issues addressed early are far less disruptive and expensive than deferred repairs.

A Shared Effort

Homeowners can support spring efforts by being patient during seasonal work, reporting issues when they see them, and following community guidelines. When homeowners and boards work together, the entire community benefits.

Spring landscaping and maintenance work set the tone for the year ahead. A well-maintained community is one that thrives.

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Birds of a Feather

by Angie Rosploch, CMCA, AMS, - Hunt Management



In a property management environment, employees handle a wide range of responsibilities—from resident communication and maintenance coordination to administrative tasks and compliance tracking. Because of this variety, individuals naturally develop different approaches to organizing their work and managing their responsibilities.

Understanding these work styles can improve team collaboration, increase efficiency, and reduce frustration. Each style reflects a different way of processing information, prioritizing tasks, and maintaining organization. There is no “right” or “wrong” approach— just like birds with different traits, each work style brings something unique to the team.

The following work styles—Hummingbird, Duck, Owl, and Parrot—offer a simple framework to help identify how individuals prefer to work. By recognizing these patterns, team members and leaders can better align processes, communication, and expectations to create a more productive and supportive workplace.

The Hummingbird Work Style is hands on, fast moving, and often balancing several responsibilities at once—like coordinating maintenance, responding to residents, and tracking ongoing projects. They prefer to keep active materials visible so they can easily continue where they left off.

Continued on page 30...



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Birds of a Feather

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• Hummingbird Examples:

- Keeps current work orders, vendor bids, and inspection notes laid out on their desk
- Uses sticky notes or printed emails as reminders for follow-ups
- Keeps multiple software tabs open for different properties

• Hummingbird Strengths:

- Good at multitasking and handling high-volume workloads
- Stays actively engaged with ongoing projects and follow-ups
- Quick to respond and adapt to changing priorities
- Strong sense of ownership over tasks until completion



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The Duck Work Style focuses on creating a clean, polished, and welcoming workplace. Their visible areas are typically neat and professional, which is especially important in resident-facing roles. However, less visible systems—like drawers, file cabinets, or digital folders—may become disorganized without simple maintenance routines.

• Duck Examples:

- Maintains a tidy desk or front office
- Moves paperwork or email out of sight quickly
- Stores items in drawers or folders without a clear system

• Duck Strengths:

- Creates a professional and welcoming environment
- Strong attention to appearance and first impressions
- Reduces visual distractions in shared spaces
- Works efficiently in customer-facing settings

The Owl Work Style thrives on order, detail, and consistency. They prefer clearly defined processes and systems for handling leases, maintenance tracking, financial records, and communication logs. They build strong organizational structures but may spend extra time refining them to make sure everything is precise.

• Owl Examples:

- Spends time improving workflows and processes
- Uses checklist
- Organizes files using consistent naming systems

• Owl Strengths:

- Accurate and detail-oriented
- Builds system that improve consistency
- Strong compliance and documentation habits
- Excellent at tracking timelines and deadlines

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Birds of a Feather

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The Parrot Work Style relies on visual cues to stay organized and productive. They do best when tasks, documents, and reminders are clearly visible rather than stored out of sight. Traditional filing systems can make it harder for them to stay on top of responsibilities, so they benefit from simple, visible tools.

- **Parrot Examples:**

- Uses whiteboard or wall calendars
- Keep frequently used material in open, visible spaces
- Relies on color coding or labels
- Prefers task list

- **Parrot Strengths:**

- Strong awareness of immediate priorities
- Adapts quickly to new or changing tasks
- Creative problem-solver
- Ensure key deadlines and tasks remain prioritized and visible

In any property management team, recognizing and respecting different work styles can make a meaningful difference in both performance and collaboration. Each approach—whether fast-paced, detail-driven, visually focused, or presentation-oriented—brings unique value to the workplace. When team members understand their own tendencies and those of others, they can adapt processes, improve communication, and support one another more effectively. After all, “birds of a feather flock together,” but strong teams succeed by bringing together different strengths and perspectives. By embracing these differences, teams can create a more balanced, efficient, and supportive work environment for both employees and the residents they serve.

In closing, a fun takeaway would be to challenge your team to discover what type of animal you are. I guessed Angie was an owl, while I see myself as a hummingbird—and Angie agreed with that as well! In property management, I'd say we probably all carry a feather from each at different times.

We all work differently and bring unique strengths to the team, so embrace what makes you YOU... and let your animal show!

Written by Angie Rosploch, CMCA, AMS, with Hunt Management for 4 years and 12 years in property management, and Heather Sadler, CMCA, AMS, with Hunt Management for 4 years and 9 years in property management.

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CAI Wisconsin Outreach Committee Hosts Successful Madison Networking Event

On April 30, 2026, the CAI Wisconsin Outreach Committee hosted a social networking event at Spare Time Entertainment in Madison. The venue provided an excellent setting for members and industry professionals to connect, collaborate, and enjoy an evening of fun and networking.

As part of the event package, Spare Time Entertainment included a one-year advertising opportunity for Community Associations Institute (CAI) on its in-house digital screens. In addition, CAI National contributed 50% of the advertising cost, making this a valuable outreach opportunity to increase awareness of CAI within the Madison community.

Approximately 38 individuals attended the event, including business partners, community association managers, condominium homeowners, and board members from the Madison area. Attendees enjoyed networking opportunities while participating in duckpin bowling and other activities offered at the venue.

The Outreach Committee extends its sincere appreciation to the event sponsors whose support helped make the evening a success:

- **Event Sponsor:** SERVPRO – Team Cowell
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The committee received overwhelmingly positive feedback from attendees and looks forward to some more exciting events in the Madison area. These gatherings provide valuable opportunities to strengthen relationships within the community association industry and introduce more condominium and homeowners association leaders to the benefits of CAI membership.

If you know business partners, community association managers, management companies, condominium homeowners, or board members in the Madison area who could benefit from learning more about CAI, we encourage you to reach out to a member of the Outreach Committee. We welcome the opportunity to connect with new individuals and organizations interested in supporting and strengthening community associations throughout Wisconsin.

Outreach Committee Members

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- Samantha Hoppe, CMCA, AMS – shoppe@huntmanagement.com
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CAI Wisconsin Madison Networking Event Recap

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HUD Update - Wisconsin

by Amy Peterselli - Kaman & Cusimano, LLC

Summary of May 22, 2026, Memorandum

On May 22, 2026, the U.S. Department of Housing and Urban Development (“HUD”), through its Office of Fair Housing and Equal Opportunity (“FHEO”), released a memorandum (“Memo”) updating the federal government’s enforcement approach to reasonable accommodation requests involving animals. The Memo provides historical background regarding the treatment of emotional support animals (“ESAs”) in federal fair housing complaints and notes that ESA-related complaints currently account for more than 20% of FHEO’s fair housing caseload. The Memo distinguishes ESAs from Service Animals (“SAs”), explaining that ESAs are often untrained but do provide support, while SAs are individually trained to provide disability-related assistance, such as seizure detection or other task-based support. Considering the volume of ESA-related complaints and inconsistent interpretations of prior guidance, HUD has indicated that FHEO will generally no longer pursue ESA-related reasonable accommodation complaints through federal administrative enforcement.

No More ESAs?

When the federal government limits its administrative enforcement of a particular subject matter, state law may become the primary avenue for relief. In Wisconsin, Wis. Stat. § 106.50 addresses ESAs at the state level and generally mirrors prior FHEO guidance regarding ESA-related reasonable accommodations. Specifically, the statute provides that housing, including housing within condominiums, may not be denied to an individual seeking a reasonable accommodation for an ESA if the housing provider receives reliable documentation from a Wisconsin-licensed health professional confirming that the individual has a disability and a disability-related need for the ESA. Previously, because federal guidance did not require the health professional to be licensed in Wisconsin, that state-specific requirement was not necessarily recommended as a best practice. With HUD’s revised enforcement position, Wisconsin’s statutory requirements now play a more significant role in ESA reasonable accommodation requests.

What Does This Mean?

The Memo results in two primary takeaways. First, HUD will generally limit its federal administrative enforcement of animal-related reasonable accommodation complaints to matters involving Service Animals. ESA-related complaints will more likely be addressed under state law, although federal fair housing laws and applicable case laws and precedent will still retain relevancy in any potential discrimination claim. Second, HUD will continue to process discrimination complaints involving Service Animals, while ESA-related claims will typically proceed through state enforcement mechanisms, state courts, or other judicial avenues rather than through HUD administrative enforcement.



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