



**RHODE ISLAND COALITION
OF HOUSING PROVIDERS**

www.ricohp.org

March 14, 2025

The Honorable Representative Robert E. Craven, Sr.
Chair, House Judiciary Committee
Rhode Island State House
Providence, RI 02903

VIA Email: HouseJudiciary@rilegislature.gov

RE: Letter in SUPPORT of House Bill No. 5504

Dear Members of the House Judiciary Committee,

We are writing to you on behalf of the Rhode Island Coalition of Housing Providers ("the coalition") in strong support of House Bill 5504 ("the bill").

The coalition represents a diverse group of housing providers throughout the State of Rhode Island from various backgrounds, all striving to provide safe and quality housing to Rhode Island tenants.

The bill updates the Rhode Island Fair Housing Practice Act by strengthening protections for Rhode Island tenants who have a documented need for a Service Animal or Emotional Support Animal ("ESA") while also working to prevent fraud and abuse of that same act.

One of the biggest challenges facing landlords today is when prospective or current tenants attempt to circumvent no-pet policies by claiming their pet is either a Service Animal or an ESA and thereby requiring the landlord accept the pet as such. Regrettably, oftentimes landlords accept the tenants' claims as true, without verification, for fear of running afoul of a fair housing complaint.

The proposed amendments would bring back some measure of balance by a) clarifying what a service animal is, and b) placing reasonable safeguards to prevent widespread abuse of online services that create documentation for just about any animal as an ESA.

First, the bill would update Rhode Island's definition of a "Service Animal" to match that of federal law under the Americans with Disabilities Act ("ADA"). Specifically, "Service Animals are defined as dogs that are individually trained to do work or perform tasks for people with disabilities."¹

Second, the bill would also clarify that an Emotional Support Animal is a dog or a cat that provides emotional, cognitive, or other similar support to an individual with a disability. This clarification would remove the possibility of abuse and designations of large or small barnyard animals, or even reptiles, as ESAs that have no legitimate place inside a home.

Furthermore, the bill seeks to curb abuse of click-and-pay for online-generated documentation for ESAs. Right now, someone who wants to circumvent a no-pet policy can simply go online, pay a fee, and get ESA documentation for whatever animal they might have without having to see a local doctor. To stop this abuse, the bill requires that a tenant seeking an ESA designation for their pet seek out a local Rhode Island healthcare practitioner and actually establish a relationship with that practitioner who can then provide written documentation for the tenant's ESA needs.

Also, the bill updates the language of our law to match HUD guidance regarding the interactive process between landlord and tenant when an accommodation is requested for an assistance animal. As per HUD, the interactive process is different depending upon whether or not the person's disability is obvious.² If it is not, then a limited inquiry may be made by the landlord before providing the accommodation (in this case, accepting an ESA or Service Animal when there is a no-pet policy).

Overall, the bill makes commonsense adjustments to our current law and strengthens the protections for those tenants who legitimately need a Service Animal or an ESA. By adding these protections and thwarting abuse, tenants will have the benefit of more consistent access to housing and fair treatment when requesting accommodations for their ESA. For landlords, the benefits are simple: clear guidelines for making accommodations and the prevention of fraud that may not only be a threat to their property but also to other tenants who may be in the same building. For both parties, the bill will improve the landlord and tenant relationship by offering transparency and fairness for all.

Thank you for the opportunity to comment on this important legislation.

Sincerely,



Shannon Elizabeth Weinstein
On behalf of the RI Coalition of Housing Providers

¹ <https://www.ada.gov/resources/service-animals-2010-requirements/>

² https://www.justice.gov/sites/default/files/crt/legacy/2010/12/14/joint_statement_ra.pdf