



**ARMED FORCES  
HOUSING ADVOCATES**

READINESS STARTS WITH A SAFE HOME



OCTOBER 2022

# MHPI RESIDENT REPORT

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## MESSAGE FROM THE DIRECTOR

AFHA serves military families of every branch across the continental US, Hawaii, and Alaska. We seek to empower the 700,000 families living in privatized military housing through our direct advocacy services to ensure their safety. Since May 2021, our advocates have helped approximately 1,700 families with mold remediation, asbestos, and lead exposure, window safety, Fair Housing Act compliance, gas and sewage leaks, water contamination issues, and PCS homelessness. We provide direct educational services to families about their rights and empower them to become their own advocates. AFHA also collects and reports data regarding the substandard living conditions in privatized military housing to bring about long-lasting protection for current and future residents of privatized military housing.

Since our inception, AFHA has accumulated an incredible team of volunteers with the same passion-not a single team member is paid. Every member is a veteran, military spouse, service member, or someone who has lived in an MHPI home. Our organization is the only of its kind- to our knowledge, we are the sole nonprofit that serves military service members and families with zero contractual or personal obligations to the Department of Defense nor any privatized military housing project or affiliate. This commitment means we are beholden to residents only and can provide comprehensive services while keeping their best interests in mind. This commitment is set in stone in our bylaws, as we feel that it is one of the essential elements of AFHA. We fully believe that the operational readiness of our troops starts with a safe home.

**"Readiness starts with a safe home."**

# FIGURES OF NOTE

**99%**

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Private-sector companies own and operate about 99% of homes on military installations in the United States. Five companies-Corvias, Hunt, Lendlease, Balfour Beatty, and Liberty Military Housing-own the majority of the portfolios of homes.\*

\*As reported by the GAO, 2022.

**65.5M**

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The total of fines\* for only two of the 14 MHPI companies that have been actively pursued due to work order fraud. With over 200,000 homes on the market, this number stands to grow exponentially, based on our service of 1700 families and counting.

\*As reported by the Department of Justice, 2021

**70%**

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People report that they have a negative outlook on maintenance, repairs, or remediation in privatized military housing, with 50% of respondents stating they would leave service if having to stay in these homes.\*

\*As reported in Reuters and Privatized Military Housing Surveys, 2021-2022



# OVERSIGHT

We advocate that the Military Housing Readiness Council Act be adopted as a focal point for safer military housing.

*Here is why:*

- The most recently released IG report indicates the refusal of implementation of the Tenant Bill of Rights across all privatized housing companies. Further, those that have implemented them are not consistent between families or installations, and some companies make it nearly impossible for the rights to be accessed- access to the rights, like informal dispute resolution, is the decision of the housing company staff themselves.
- As of October 2022, AFHA has been called upon by over 1,700 families for assistance, only being open as an organization for 17 months. The number increases weekly, with an average of 15-20 cases.
- Cases we see are systemic issues-not individual problems like housing companies claim. We have the data to back up consistent problems with pervasive mold, leaks, window safety violations, disability accommodation violations, food insecurity, and homelessness due to lengthy PCS waiting lists. Although the Secretary of Defense has agreed to raise BAH rates, this is a bandaid fix for larger issue-housing companies will now raise their collection rates and profit. At the same time, families will still be stuck waiting on months-long lists for housing and competing for housing and food in an astronomical market.
- The only way to truly hold housing companies accountable and progress in performance is to ensure impartial organizations, like AFHA, are commanding oversight along with other subject-matter experts.

*The Council will include organizations like the International Code Council, the Institution of Inspection Cleaning and Restoration Certification, and Congressionally-appointed organizations, hopefully like ours, to ensure full resident representation.*



# OVERSIGHT CONTINUED

Specifically, the Military Housing Readiness Council Act would do the following:

- Provide Enhanced Oversight
  - Reviews and makes recommendations to the Secretary of Defense regarding policies for privatized military housing, including inspection practices, resident surveys, landlord payment of medical bills for residents of housing units that have not maintained minimum standards of habitability, and access to maintenance work order systems.
  - Monitors the Department of Defense's compliance with and implementation of statutory improvements to policies for privatized military housing, including the Military Housing Privatization Initiative Tenant Bill of Rights and the public military housing complaint database.
- Regularly Engage Stakeholders
  - Draws membership from the Department of Defense, every military service, officer and enlisted service members, spouses of officers and enlisted members, a representative of the International Code Council, a representative of the Institute of Inspection Cleaning and Restoration Certification, and other members to be selected by the chairs and ranking members of the armed services committees.
  - Requires the Council to meet no fewer than four times a year.
  - Makes additional recommendations to improve collaboration, awareness, and promotion of accurate and timely information about privatized military housing, including accommodations available through the Exceptional Family Member Program.
- Provide Transparency
  - Requires annual reporting to the Secretary and the congressional defense committees on the Council's activities, including analyses of complaints of tenants of housing units, data received on maintenance response time and completion of maintenance requests, assessments of dispute resolution processes, assessments of housing inspections, and any survey results conducted by the Council.

*September 2022-One photo of hundreds from a family at Eglin AFB whose entire home and belongings were covered in mold. It took the family nearly a year and assistance from AFHA to resolve this issue. The resolution was subpar, and the family will most likely sue the company.*



# ENVIRONMENTAL ISSUES & CERTIFICATIONS

We advocate that all personnel serving as maintenance technicians are certified through the Institution of Inspection Cleaning and Restoration Certification (IICRC) for mold remediation, water intrusion and floods, and other restoration, cleaning, and inspection areas pertinent to maintaining adequate and safe homes. Further, we advocate that all outside bidding contractors hired by MHPI companies to inspect and remediate homes for these issues be in good standing and certified by the IICRC.

*Here is why:*

- The 2021 Military Family Support Programming Survey, which involved 8,638 active-duty members, retirees, dependents, and veterans, found that while 63% of those surveyed would recommend military life to someone considering, that number was down from 75% in 2019. Mold and poor housing and barracks conditions were cited as the largest reasons.
- Further, a 2022 survey done by AFHA of 1,000 service members over two days showed that 50% of currently serving personnel would not consider reenlisting for the same reasons.
- The HunterSeven Foundation cites that Post-9/11 veterans are 193% more likely to be diagnosed with cancer than civilians from exposures to toxins, burn pits, and other war-related hazards. Add to that exposure to toxins in the home or barracks, such as mold, lead, or asbestos, and that number increases exponentially, according to their Executive Director, Chelsey Simoni. This is not only a financial burden on our taxpayers but a horrendous way to thank those who have protected our country after their service.
- Military families have filed lawsuits and testified before Congress since 2019 on their poor housing conditions, noting that the companies often ignored maintenance requests or took shortcuts in repairing their homes. It is 2022, and we are still being called to testify about these horrific housing conditions because the issue is still *systemic and pervasive*.
- AFHA has the data to prove that most of the moldy homes are covered in stachybotrys and chaetomium strains of mold-the most dangerous strains for a person to be exposed to.

*The ceiling of one room in a service member's MHPI home after returning home from a deployment. The entire home was covered, from floor to ceiling, in this mold. AFHA had to fight with the housing company to get the service member out of his lease.*

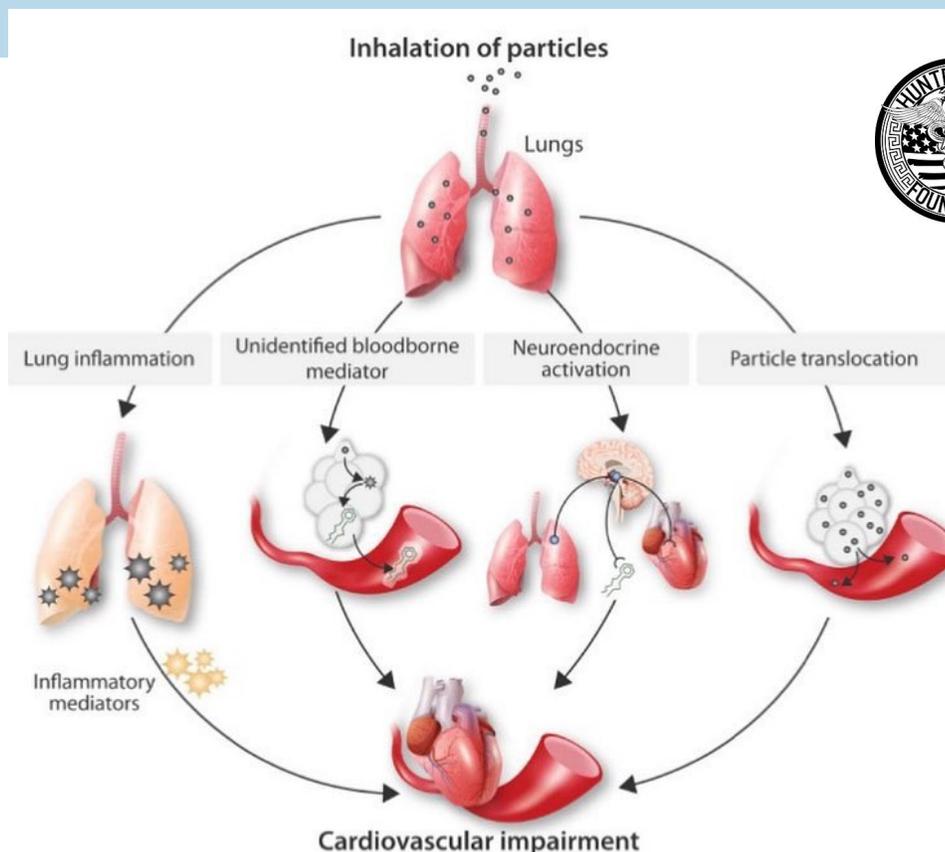


# "HEALTHY INDOOR AIR IS...A BASIC RIGHT"

"Healthy indoor air is recognized as a basic right. People spend a large part of their time each day indoors: in homes, offices, schools, health care facilities, or other private or public buildings. The quality of the air they breathe in those buildings is an important determinant of their health and well-being." - World Health Organization (WHO), 2009.

*Supporting data and scope:*

- EPA research indicates air pollutants can be 2 - 5 times - even up to 100 times - higher indoors than outdoors.
- People spend up to 90% of their time indoors; thus, a healthy indoor environment is critically important. - CDC/NIOSH
- As of 2007, it was estimated that approximately 4.6 million cases of asthma (21%) in the U.S. result from exposure to dampness and mold and that the resulting economic cost of this health impact is approximately \$3.5 billion annually. - EPA
- An EPA Building Assessment Survey found that nearly 50% of buildings were experiencing "ongoing problems with leaks causing water damage."
- A 2018 study from Tufts University found that exposure to mycotoxins demonstrated positive associations with asthma, wheezing, and bronchitis, as well as fatigue, musculoskeletal pain, headaches, anxiety, mood, cognitive impairments, and depression. People exposed to molds and mycotoxins present symptoms affecting multiple organs, including the lungs, musculoskeletal system, and central and peripheral nervous system.
- A Brown University public health study found that occupants of homes with mold and water damage were up to 44% more likely to suffer from depression.
- Harvard University published a Healthy Homes guide which concluded that, in the U.S. alone, the savings and productivity gains from improved indoor environments are estimated at \$25 - \$150 billion per year.



# WINDOW SAFETY

We advocate that Evan's Law language is amended from "installation for projects undergoing whole home renovations" to "all MHPI homes in existence and all newly constructed homes."

*Here is why:*

- We cannot leave behind the vast majority of families that will still reside in historic homes and homes that have no plans to be renovated soon.
  - 15 children had window falls from 2017-2021...and those are questionable figures due to the reporting mechanism. We believe there are more, with 6 documented falls between 2020-2021 in San Diego alone.
- DoD has responded to Congressional inquiries stating that they do not intend to appropriate the funds for MHPI projects to purchase window fall prevention devices because "the companies have not asked for the money, and they have stated they have their plans."
  - In a 2022 article from the Military Times, four of the largest housing companies responded, stating they will have the residents pay for them, will not install them, or have given the same figures they have shared over the last two years about how many have been installed. A fifth company, Hunt, declined to comment at all.
- This is an easy, common-sense amendment that will hold MHPI companies accountable to stop using loopholes in Evan's Law to continue pocketing money at the cost of grave injuries and deaths of our military children.

*Evan English, the law's namesake, passed away shortly after this photo on March 24, 2011-one week before his fifth birthday.*



# DISABILITY RIGHTS

We advocate that the rank band policy should no longer apply to accessible and easily modifiable homes.

*Here is why:*

- Often, there are accessible homes available that meet the needs of families with disabilities. Still, they are outside the service member's rank band due to new builds or larger homes only available to senior enlisted and officer ranks. This leaves Jr. enlisted families with very little or no options when needing an accessible home.
- MHPI companies place senior enlisted and officer families who are non-disabled in newer built, or larger accessible homes over Jr. enlisted ranks who are disabled due to rank band policy.
- Under the Fair Housing Act and Section 504, housing companies should already be making an exception to policy for military families with disabilities and waiving the rank band policy to place families in an accessible home that meets their needs regardless of the service member's rank.
- MHPI companies are either unaware of the laws or unwilling to follow them, and families have to spend time and energy fighting for what they need or end up in a home that does not have the accessibility features they need.

*Disability rights for families are increasingly difficult to access, as spouses are often not listed as tenants on the lease, and MHPI staff will refuse to communicate with them. This leaves a disabled service member at the mercy of deployments and training schedules.*



# EQUAL RIGHTS

We advocate that all adult residents, excluding dependent children (18 and over), be listed as “tenants” rather than as “occupants” or “residents” on leases managed by companies participating in the Military Housing Privatization Initiative (“MHPI”).

*Here is why:*

- Industry standard allows all adults to be listed as tenants. The status of "tenant" is not dependent on an individual's occupation in premises rented outside of military housing. Military spouses should be allotted the same rights as their civilian counterparts.
- Allowing the spouse of a service member to be listed as a tenant ensures equal access to all laws governing housing under state law and is beneficial to protect all family members. This includes landlord-tenant laws and laws protecting the safety of domestic violence victims.
  - The service member is listed as the only tenant means that if a situation of abuse occurs where the service member is removed from the residence, the victims in the home will be ineligible to reside in the home and are at risk for homelessness. Also, the service member, as the sole tenant, has the right to end any lease at any time without the consent of the other parties residing in the home. By listing the spouse as a tenant, they are equally protected as victims of abuse from becoming homeless.
- Limiting tenant history based on occupation does not allow the spouse of a service member to build a rental history.
- Power of Attorney documents have frequently been denied while service members are unreachable. By listing the spouse as a tenant, the spouse would be allowed equal opportunity to remedy issues in their homes.

*In 2022, two percent of cases at AFHA involved a military spouse being unhoused due to domestic violence and having no rights as a tenant. The DoD recorded more than 42,000 domestic abuse incidents in its population from 2015 to 2019, but the real number is likely higher, according to the GAO.*



# OUR COALITION



Real Science, Real Simple™

