

TO: Conrad Egan, Chair - FCRHA  
CC: Paula Sampson, HCD; Tom Fleetwood, HCD  
FROM: Pam Barrett, FA-DSB Housing Subcommittee Chair  
DATE: January 30, 2008  
SUBJECT: Comments for the FY 2009 FCRHA/DHCD Annual Public Housing Plan

Mr. Egan, on behalf of the Fairfax Area Disability Services Board, I am pleased to share with you the DSB's comments on the draft FCRHA Plan for FY 2009 and related issues. We look forward to increased collaboration with the RHA and HCD in regard to the recommendations below and to the creation of new options for increasing affordable and accessible housing. The year 2007 will in great part be remembered for the progressive steps that the RHA took on behalf of universal design. Thanks again for these efforts.

The overall justifications for the comments and recommendations below include the following:

- There is a documented shortage of affordable, accessible housing stock
- Aggregate data indicate that almost a quarter of families on housing waiting lists have a member with a disability and 17.9% of head-of-households self-identify as having a disability.
- Waiting list databases may continue to lack specific information on the accommodation needs of people with disabilities (e.g., need for sufficient space in the bathroom to turn a wheel chair) and there are difficulties with efficiently matching people with disabilities to the appropriate type of accessible housing.

The recommendations below are of two types. Some offer specific language that could be placed in the specific section of the annual plan that we have identified and the others address specific policy or program needs, but stop short of suggesting the language that should be made part of the Plan or other RHA plans and documentation. In fact, not all of the recommendations below directly involve the Public Housing and Housing Choice Voucher Programs, but are included here for the sake of being comprehensive.

In this cover memo, we would like to request an update on a couple of last year's recommendations that you accepted. They are as follows.

- Last year, HCD staff included in the FY08 annual plan this statement: "The number of accessible affordable dwelling units and the extent of accessibility will be tracked to guide ongoing efforts to increase the number and quality of accessible units." Is there an update on the data tracked heretofore and can the DSB take a look at this data?
- Last year, HCD implied in its response to the DSB comments that a change to the Mainstream Voucher Program may be justified (i.e. the voucher funding formula works against procuring funds for modifying public housing units and supportive services for persons with disabilities). If there are any ways that we

can assist in obtaining an applicable change to the Mainstream Voucher Program, please let us know.

Thank you again for your consideration of the FA-DSB comments. If you have any questions, please feel free to contact me at 703-389-1293 or Carl Varner of the DSB staff at 703-324-5219.

## **Section of Annual Plan: 1. Statement of Housing Needs**

### **C. Strategy for Addressing Needs**

**Need: Shortage of affordable housing for all eligible populations**

**Strategy 2: Increase the number of affordable housing units**

Recommendation 1: Include language as follows: "The County will consult with appropriate stakeholders for the following two purposes.

- a. to explore the option of determining a percentage of new ADU's and preservation units to set-aside for rent or ownership by low income county residents that includes a set-aside for people with disabilities (i.e. families at or below 50% of the AMI and especially 30% of the AMI).
- b. to consider the appropriate subsidy approaches needed to make these set-asides applicable to lower income residents.

FA-DSB Comment: The special needs housing work group articulated in Recommendation 4 below may be the appropriate source for the "appropriate stakeholders" mentioned above. Additionally, in its 2007 response to the DSB's comments, HCD indicated that it would forward a similar, narrower recommendation on ADUs to the ADU Task Force for consideration. The reason for HCD's gesture was that an ADU set-aside would require the Board of Supervisors' approval and a change to the zoning ordinance. The FA-DSB realizes this action step may be in play for this year and we would appreciate HCD's input on the additional actions steps that would be needed to fulfill the broader recommendation for this year mentioned immediately above.

Recommendation 2: Include language as follows: "In regard to low income people with disabilities who cannot otherwise arrange to make necessary accessibility upgrades to housing units obtained through county administered housing programs, HOME and CDBG funds, or other appropriate funding, will be earmarked to increase the level of accessible housing in all RHA housing programs and, in particular, increase beyond 5% the level of housing that is required by HUD to be accessible."

FA-DSB Comment: This recommendation is reiterated from last year. The HCD response to this recommendation from last year is below. What about the specific HOME and CDBG earmark suggestion that we made? Such an earmark would be useful when it comes, for example, to HCD's intention to explore the possibility of converting Wedgewood's ground level units for people with

disabilities who have accessibility needs. Furthermore, instead of anticipating the need for accessibility upgrades, a separate holding account for earmarks from which funds can be drawn may be more effective in providing reasonable modifications on a case-by-case basis.

RHA/HCD '07 Response: "The FCRHA has consistently identified resources to be used for accessibility modifications in the rental properties it owns and operates, as well as for group homes and other affordable properties owned by private nonprofits. In addition, the Fairfax County Home Improvement Loan Program (HILP) and Home Repair for the Elderly (HRE) Program do provide assistance to qualified homeowners seeking to make certain accessibility-related modifications to their properties. Due to limited resources, HCD has not been able to expand these services to other programs, such as the Housing Choice Voucher Program."

### **Other Recommendations Not Tied to a Specific Section of the Plan**

Recommendation 3: The FCRHA will report on the accessibility considerations taken into account when decisions are being made by the RHA/HCD on which affordable housing preservation opportunities to pursue. This input will be shared regularly with the Fairfax County Affordable Housing Advisory Committee and other relevant entities, as appropriate. The availability of public transportation will be included in the FCRHA's accessibility considerations.

FA-DSB Comment: This recommendation is a holdover from last year's DSB comments. Last year, FCRHA provided a very detailed and appreciated response in regard to accessibility considerations for new construction and rehabilitation. But what about preservation? The DSB is assuming that there are scenarios in which the RHA has to prioritize which preservation options to pursue. With this recommendation, the DSB is hoping to assess how accessibility considerations factor into RHA's decision making on what preservations projects to pursue.

Recommendation 4: Recognizing that the need for affordable housing for those below 50% and 30% of the median income remains a critical issue in Fairfax County, the FA-DSB strongly supports the creation of a Special Needs Housing Work Group that would have a representative membership (e.g. FA-DSB and CSB representation, as well as appropriate staff from CSB, DFS (e.g. Disability Services), and other community stakeholders). This workgroup could be modeled after Fairfax County's very successful Affordable Housing Advisory Committee, which was predominantly geared towards the preservation of existing units for those earning 50% and above of the AMI. The purposes of the Special Needs Housing Workgroup could include, but would not be limited to, the following:

a. to create a forum for communication and on-going collaboration to identify respective roles and resources in the provision of housing services to the most vulnerable citizens of our community.

b. to build upon the existing organized preservation efforts aimed predominantly at incomes of 50% and higher by re-directing a component of the preservation effort toward the benefit of lower-income families with additional consideration for those with disabilities.

c. to consider and pursue creative and cost-efficient ideas on increasing the production of affordable housing (e.g. RHA could examine its own public housing and FCRP developments for potential redevelopment as mid-rise or other more densely developed projects that could increase the number of units serving very low income households as well as provide units to moderate income households also in need of affordable housing).

d. to review a semi-annual status report provided by FCRHA that would be used as one basis from which the work group could provide input to the RHA's various annual planning processes and documents.

Recommendation 5: The DSB understands that HCD and its technology vendor are expanding the on-line application data base to include consumer access to an on-line reasonable accommodations form. We recommend that HCD monitor whether or not consumers use this form to request specific types of unit accessibility features and whether the availability of this information actually helps HCD in facilitating unit assignments that accommodate the accessibility needs of consumers coming off the wait lists.

FA-DSB Comment: The DSB will make a note to check with HCD mid-year to see if the addition of the reasonable accommodation form has made a positive impact on alleviating any consumer/accessible unit matching gaps that may be occurring. If the impact does not meet HCD's standards, perhaps we could consider a drop down menu that not only leads to a reasonable accommodation form, but also offers a selection list of required physical accessibility features.