Accessibility Requirements and Strategies for Homekey: Technical Assistance

The Homekey Program Round 2 provides a significant investment to rapidly expand housing for persons experiencing homelessness or at risk of homelessness, and who are, thereby, inherently impacted by or at increased risk for medical conditions due to the COVID-19 pandemic. The COVID-19 pandemic exacerbates existing community needs and inequalities. In many communities, homelessness was already experienced disproportionately by race and other protected classes, including disability status.¹

This document offers guidance to the Accessibility components of the Homekey NOFA. Applicants who have additional questions may contact California Department of Housing and Community Development (HCD) staff at https://example.com/homekey@hcd.ca.gov.

High-Level Summary

Homekey NOFA Section 505: Accessibility and Non-Discrimination

Relevant Threshold Requirements:

All developments shall adhere to the accessibility requirements set forth in California Building Code <u>Chapter 11A</u> and <u>11B</u> and the <u>Americans with Disabilities Act</u>, <u>Title II</u>. In addition, developments shall adhere to either <u>Uniform Federal Accessibility Standards</u> (<u>UFAS</u>), <u>24 C.F.R. Part 8</u>, or HUD's modified version of the <u>2010 ADA Standards for Accessible Design</u> (Alternative 2010 ADAS), <u>HUD-2014-0042-0001</u>, 79 F.R. 29671 (5/27/14) (commonly referred to as "the Alternative Standards" or "HUD Deeming Memo"). Accessible units shall, to the maximum extent feasible and subject to reasonable health and safety requirements, be distributed throughout the Project and be available in a sufficient range of sizes and amenities consistent with <u>24 CFR Section 8.26</u>.

<u>Homekey NOFA Section 304: Application Scoring Criteria, Community Impact and Site Selection 4d.</u>

Scored criteria (up to 10 points):

- Evaluation Criteria 4d, exceed the State and Federal Accessibility threshold requirements described above, specifically:
 - Projects with 20 or more units, provide a minimum of 15 percent of units with features accessible to persons with mobility disabilities (5 points).
 - Projects with 20 or more units, provide a minimum of 10 percent of units with features accessible to persons with hearing or vision disabilities (5 points).

¹ As of June 12, the Centers for Disease Control and Prevention reported age-adjusted COVID-19 hospitalization rates are highest among non-Hispanic American Indian or Alaska Native (5 times white persons) and non-Hispanic Black persons (5 times white persons), followed by Hispanic or Latino persons (4 times white persons).

Technical assistance related to the threshold and scoring criteria described above:

<u>Homekey NOFA Section 304: Application Scoring Criteria, Community Impact and Site Selection 4d.</u>

4d. The extent to which the Project (with 20 or more units) commits to being accessible to persons with disabilities (Up to 10 points)

Homekey NOFA Section 304, Application Scoring Criteria 4d is met by exceeding the threshold requirements, specifically projects designating 15% or more with features accessible to persons with mobility disabilities and 10% of units with features accessible to persons with sensory (hearing or vision) disabilities, as defined in 24 C.F.R. Section 8.22 and the parallel ADAAG 2010 and CBC provisions. If the Project exceeds the threshold criteria in other ways, that is relevant information to include in the application.

- Exceeds the state and federal accessibility requirements set forth Section 505, specifically providing a minimum of 15 percent of units with features accessible to persons with mobility disabilities, as defined in 24 C.F.R. Section 8.22 and the parallel ADAAG 2010 and CBC provisions. (5 points)
 - Example: In a development with 20 units, 15% of units = 3 units accessible to persons with mobility disabilities
- A minimum of 10 percent of units with features accessible to persons with hearing or vision disabilities, as defined in 24 CFR Part 8.22 and the parallel ADAAG 2010 and CBC Chapter 11B provisions. (5 points)
 - Example: In a development with 20 units, 10% of units = 2 units accessible to persons with hearing or vision disabilities

Homekey NOFA Section 505: Accessibility and Non-Discrimination

All developments shall adhere to the accessibility requirements set forth in California Building Code Chapter 11A and 11B and the Americans with Disabilities Act, Title II. In addition, developments shall adhere to either the Uniform Federal Accessibility Standards (UFAS), 24 C.F.R. Part 8, or HUD's modified version of the 2010 ADA Standards for Accessible Design (Alternative 2010 ADAS), HUD-2014-0042-0001, 79 F.R. 29671 (5/27/14) (commonly referred to as "the Alternative Standards" or "HUD Deeming Memo"). Accessible units shall, to the maximum extent feasible and subject to reasonable health and safety requirements, be distributed throughout the Project and be available in a sufficient range of sizes and amenities consistent with 24 CFR part 8.26.