Developing Affordable Housing By and For People with Disabilities in Washington State:

Insights from A Qualitative Comparative Case Study

Halle Thompson

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Dylan Stevenson

Rachel Fyall

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Abstract

Developing Affordable Housing By and For People with Disabilities in Washington State:

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Halle Thompson

Chair of the Supervisory Committee:

Dylan Stevenson

Department of Urban Planning

Washington State is currently facing a rental housing crisis that disproportionately impacts people with disabilities, who encounter high barriers to finding affordable, physically accessible, and integrated housing equipped with necessary supportive services. This thesis examines the Low Income Housing Tax Credit (LIHTC) program—the nation's largest multifamily housing development tool—as an under-tapped opportunity for disability-centered policy reform. The research utilizes a qualitative comparative case study of two affordable housing projects: Connection at Angle Lake in SeaTac, Washington, and The Kelsey Ayer Station in San Jose, California. By analyzing textual sources and conducting interviews with development professionals, the study explores how different state regulatory environments, funding landscapes, and partnerships with Community-Based Organizations (CBOs) motivate diverse approaches to addressing disability housing needs. Key findings indicate that while California enforces more stringent baseline accessibility requirements, projects in both states relied heavily

on mission-driven CBO partnerships to leverage lived experience, resulting in design elements and service models that exceed minimum federal standards. The success of these developments was further facilitated by transit-oriented development (TOD) incentives and the strategic layering of complex funding sources, including Section 811 vouchers and Medicaid waivers. The thesis concludes by recommending that policymakers and developers center disability voices throughout the development process, adopt higher baseline design standards (such as ANSI Type A), and establish stable, earmarked funding for disability-specific housing and services to promote more effective community integration.

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INTRODUCTION

Washington State faces a growing rental housing crisis that uniquely and disproportionately impacts people with disabilities. While strains on housing affordability increasingly impact renters across every community, these strains are specifically felt among a diversity of members within the disabled community who face higher barriers to affording physically accessible, integrated housing equipped with adequate supportive services. These barriers are the result of an evolution of public policy approaches that have laid the current landscape of civil rights protections, housing development, and social welfare provision, which converge in the United States' largest multifamily housing development program, the Low Income Housing Tax Credit program, presenting an under-tapped reform opportunity for disability advocacy.

The Low Income Housing Tax Credit (LIHTC), a tax incentive that promotes private sector investment in affordable housing development, is a complex and influential tool for building new affordable housing in the United States. As it relates to disability outcomes, the tax credit program is used alongside a network of public and private funding sources to promote targeted affordability. Federal regulations govern the physical accessibility standards of these buildings, while state Housing Finance Agencies (HFAs) determine priority populations, often relying on additional subsidies and supportive services to meet targeted levels of affordability. While disability is one of the major populations that are evaluated and prioritized in LIHTC buildings, people with disabilities are underrepresented in the tenancy of these buildings at the national level, making up about 14% of the population as a whole, but only represented in about 8% of the households living in LIHTC-subsidized buildings (HUD, 2025; Houtenville, Kingsbury & Thomas, 2026). While it is well understood that LIHTC buildings do not offer adequate levels of affordability for lower income renters, many of whom are people with disabilities, the extent of physical accessibility in LIHTC buildings for a diversity of abilities is not well understood. Advocates have identified the LIHTC program as a reform opportunity to promote disability-centered affordability and accessibility provisions.

The experience of disability is considered as both a publicly defined category that determines eligibility for public mechanisms of support, and a socially constructed outcome of impairment that is shaped by a society that fails to account for a diversity of experiences. Among the disciplines of public policy and urban planning comes an increasing emphasis on centering the lived experience of communities to promote more effective and inclusive policy-driven outcomes. With this emphasis comes the growing recognition of the role that Community-Based Organizations, defined as organizations that are embedded in the communities they serve through leadership and involvement of people with lived experience, can play in policy advocacy and housing development. As the LIHTC program presents a reform opportunity to improve housing outcomes for disabled renters, there is a lack of understanding of how this complex program interrelates with other factors, and how CBOs can be leveraged to promote inclusive housing development.

This thesis explores two research questions:

- What policies, factors, and the involvement of CBOs motivate different approaches and opportunities to address housing needs for low income renters with disabilities?
- How do identified differences between project contexts play out between development partnerships at the project level?

The purpose of this research is to determine opportunities for leveraging the lived experience of people with disabilities to reform the LIHTC program. The federal LIHTC does not operate alone, but is instead facilitated by a highly professionalized network of cross-sector actors, often delivered alongside a mix of local, state, and private funds that vary by the local regulatory and financial context. To understand reform opportunities as they relate to people with disabilities, and the intervening role played by disability-centered CBOs in this unique context, this thesis is based on a qualitative comparative case study approach between two affordable housing projects.

This thesis first outlines the existing policy and funding landscape that exists for supporting people with disabilities through an evolutionary nexus of policy approaches, ranging in their emphasis from care, to choice, to access. The literature overlays housing policy approaches onto this nexus, considering LITHC as a choice-centered policy approach that emerged alongside a disinvestment in social welfare. The current reliance on the LIHTC program for housing development, represents an imbalanced policy approach that has facilitated housing challenges due to the ongoing disinvestment in care and access approach-driven policies. This thesis goes on to describe how this imbalanced approach facilitates the observed challenges of affordability, accessibility, and integration among renters with disabilities, highlighting the pivotal role that CBOs have played in influencing disability policy and filling gaps in services.

After establishing the current regulatory landscape, this thesis selects two disability-focused affordable housing projects, in Washington and California, that used 4% LIHTC funds, tax-exempt bonds, and a mix of other funding sources. This case study compares the unique state, local, and site-level factors that influenced the development of two accessibility-driven LIHTC projects: 1) San Jose, California based project, The Kelsey Ayer

Station (referred to as Ayer Station); and 2) A Seatac, Washington-based project, Connection at Angle Lake, developed by Mercy Housing Northwest. The projects were selected as LIHTC buildings, each developed in partnership with a mission-driven, disability-centered CBO. The CBOs were involved in different capacities, but both leverage their community position to contribute to national and local housing reform topics, and their priorities are reflected in the projects. Each project navigated a different network of funding sources, organizational priorities, and resources to develop a housing project with a 20-25% set aside for people with disabilities using design standards that went beyond the minimum federal requirements. These projects included specific considerations for onsite services and physical design standards, considerations that were driven by available resources and the involvement of the CBO partners.

Using a deductive approach, this research analyzes textual sources, including project application documents, state policies, accessible design standards, and disability policy related documents produced by project partners to identify the factors that facilitated project outcomes. Secondary interviews with development staff were used to supplement textual sources to help understand priorities, tradeoffs, and opportunities for reform. Case study findings were used to generate insights about the influential role of various funding sources, policies, design standards, and partnership structures that leveraged CBO insights. To conclude these findings, this research highlights key topics for further exploration to promote more equitable outcomes for people with disabilities living in LIHTC buildings.

LITERATURE REVIEW

DEFINITIONS

When referring to individuals with disabilities, this research considers several definitions regarding "persons with disabilities" to incorporate the most comprehensive definition as enacted in Washington State non-discrimination law. Disability is defined broadly under the Fair Housing Act Amendments Act, 1990 Americans With Disabilities Act and Section 504 of the Rehabilitation Act as individuals with a physical or mental impairment that substantially limits one or more major life activities, including people who have a history of having an impairment, or may be perceived as having an impairment (Americans with Disabilities Act, 1990; Fair Housing Act, 1968; Rehabilitation Act, 1973). Washington State established its own definition in 2007 to expand upon the federal definition of disability. Washington includes people with temporary disabilities, and expands the definition of impairment to include specific physical conditions affecting specific body systems such as neurological, musculoskeletal, skin, and more; and psychiatric conditions such as cognitive limitations and emotional or mental illness, among others (Washington State Legislature, 2026).

The legal definitions are used by institutional actors across private and public spheres to establish fundamental rights, understand disparate outcomes, and determine eligibility for services as needed. In disability studies, disability is conceptualized beyond impairment as a social construction. It is the outcome of socially constructed systems that cause disadvantage, exclusion, and restriction in a society that does not consider impairment (Graham et at., 2024; Oliver, 1996). These social systems shape an expansive and diverse array of experiences among people who navigate these systems, whose lived experiences continue to evolve the understanding of where these systems fall short in their consideration (Toombs, S. K., 1995;

Mog, 2017; Andreassen, Breit, & Saltkjel, 2020). This thesis discusses this consideration as it relates to housing and services, which are regulated due to definitions of impairment.

POLICY & FUNDING LANDSCAPE

Emerging voices in social policy and disability studies describe disablement as a political ideology and a practice towards disabled people that constructs impairment at the intersection between space, geography, and policy (Soldatic, Morgan, & Roulstone, 2014). Political processes drive the outcomes of how space is conceptualized and used, and how socio-spatial exclusion is embodied in geography (Soldatic, Morgan, & Roulstone, 2014). The progression of policy development relating to service provision for people with disabilities has taken a variety of approaches with distinct underlying assumptions regarding the needs, abilities, and personhood of the disability community. The existing landscape of policies and programs that promote programs for people with disabilities is a patchwork of services and policies, the nature of which can be understood as tension among the underlying approaches across a nexus of care, choice, and access (Connery, 2016). These interrelating and critical policies and programs are discussed by Connery as they relate to disability policy as a whole. This research builds upon this nexus of disability policy approaches to consider housing policy approaches, which are discussed to the extent that they are positioned within the Low Income Housing Tax Credit program (LIHTC, pronounced“lie-tech”). As the foremost resource for developing affordable multifamily housing, this program is among the most influential systems that spatially and geographically shape housing outcomes for people with disabilities. This section expands on the policy nexus of care, access, and choice, and the following section discusses housing outcomes facilitated by this nexus.

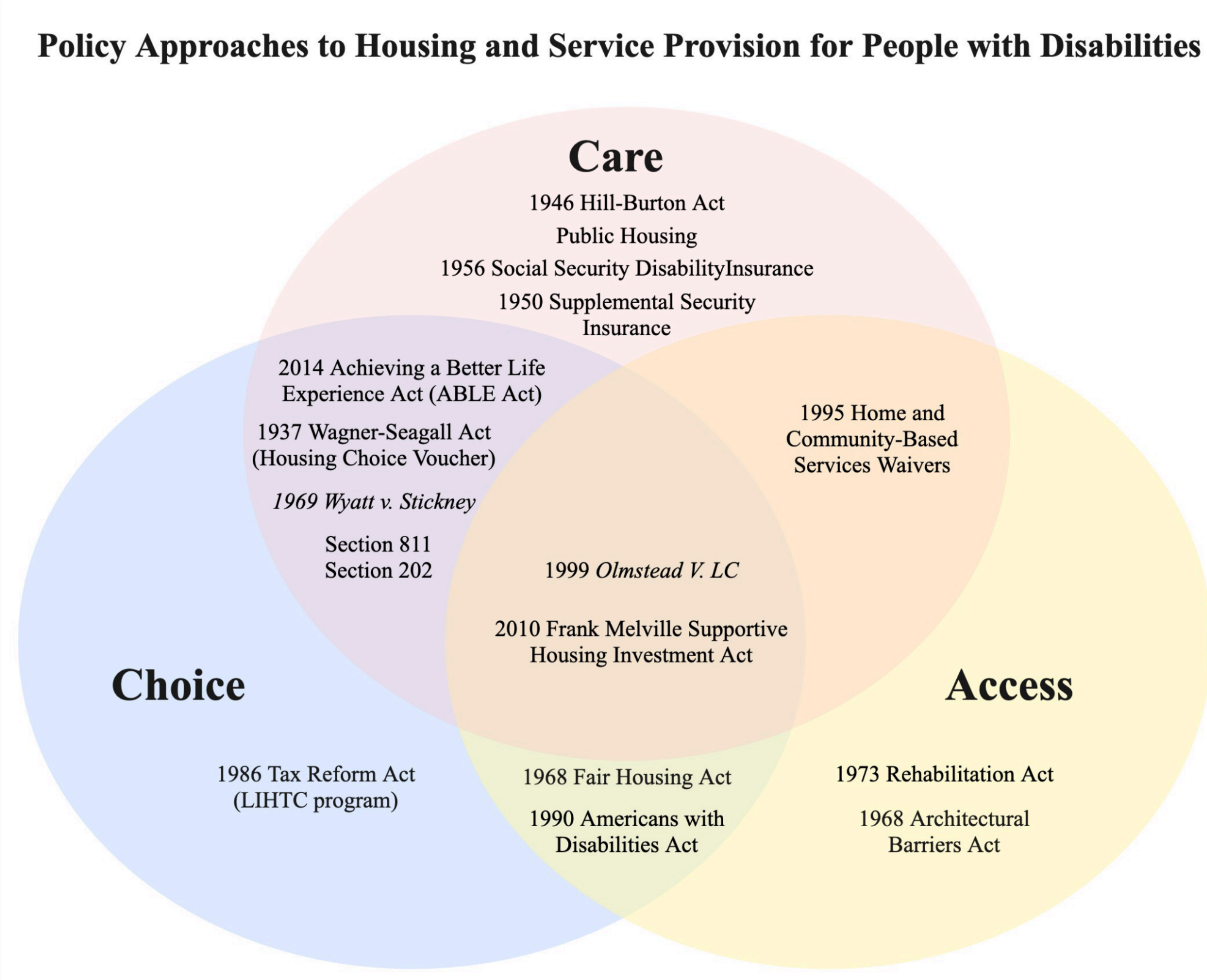


FIGURE 1: Policy Approaches to Housing and Service Provision for People with Disabilities

Care Approach

Alongside the expansion of social policy in the US in the 1930s grew a growing recognition of the rights and unmet needs of people with disabilities. To meet these needs, a policy approach centered around care emerged from the welfare policies of the 1930s and priorities driven by the Kennedy Administration of the 1960s (Connery, 2016). This period is defined as a Keynesian consensus that emphasized the role of the government in welfare provision, including supportive services and public housing (Jacobs, 2019). During this period, supportive service programs and protections were established for people with disabilities that persist today, but the predominant housing options for people varied by disability type: some individuals were to live at home if family caregiving was available, or move into segregated rehabilitation and institutionalized settings with well-documented prevalence of inhumane conditions (Minnesota Governor's Council on Developmental Disabilities, 2025). Housing provision was considered an essential component of social welfare, and advocacy raised awareness of the need to expand welfare provisions to support independent living for people with disabilities (Jacobs, 2019; Minnesota Governor's Council on Developmental Disabilities, 2025).

Regarding housing and services for people with disabilities, this policy approach placed an emphasis on protection, assistance, and special services, through both community-centered and institutional settings. Definitions of, and consideration for, persons with disabilities were defined by impairment and included in the creation of vocational rehabilitation, social security income and insurance, and public and supportive housing programs (see Appendix A for a timeline of policies and programs as they relate to housing and service provision for people with disabilities). Supplemental Security (SSI) Income, established in 1971 and targeted at populations with little to no income, remains the largest income source for individuals with disabilities who are more likely to be unable to work (Schaak et al., 2017). The reliance on, and limitations of, SSI, and limitations in other direct cash and rental assistance programs, are important elements of how a policy approach centered on care is associated with the current trends in housing affordability and services for people with disabilities.

While advocacy for independent living and supportive services gained visibility throughout the 1970s, policy approaches shifted to reorient a welfare and housing approach towards a financialized and privatized approach (Jacobs, 2019). In affordable housing provision, the fluctuating emphasis on a care approach can be observed in the disinvestment in public housing alongside the increasing dominance of privatized provision of affordable housing through the Low Income Housing Tax Credit program.

Choice Approach

A choice centered policy approach refers to a shift towards self-determination and de-medicalisation of disability policy promoted by the Independent Living movement of the 1960s (Minnesota Governor's Council on Developmental Disabilities, 2025). The momentum for deinstitutionalization and community-based services grew alongside established protections and expanded state-based funding. The choice policy approach encompasses a policy shift for more direct service provision that was carried out by private and nonprofit actors. Community-Based Organizations played a critical role in furthering political advocacy and modeling the practice of integrated service provision (Pelka, 2023). Policy amendments, court rulings, and ongoing momentum of disability-centered Community-Based Organizations supported inclusion across settings and spurred momentum for independent living programs and models (MGCDD, 2025; Americans with Disabilities Act, 1990; Fair Housing Act, 1968).

An emphasis on choice is embodied in influential federal policies that sought equal access and protection from discrimination. Section 504 of the Rehabilitation Act protected people with disabilities from discrimination, enabling litigation to establish critical concepts such as reasonable accommodations, reasonable modifications, and undue burden that shape the existing context of disability accessibility in housing and transportation (1973).

The changing mechanism of housing provision also reflects a shift towards individual choice (Jacobs, 2019). This shift in policymaking decreased the role of government in housing development and emphasized private sector housing provision through tax credits and voucher programs. The landscape of programs to support housing emphasized placed-based choice predominantly exists in the form of Section 811 Housing Choice Vouchers. The LIHTC program emerged from the 1986 Tax Reform Act as an instrumental tool for funding housing for individuals earning moderate to very low incomes. The program is one of the main resources for producing permanent supportive housing, which is provided at rates affordable to very low income households along with supportive services.

Housing provision is often thought of in terms of development, operations, and supportive services, but disability advocates have identified medical services as a distinct fourth category that is critical to one's ability to live independently (Connery, 2016). Access to medical services is integral to housing choice for some people with disabilities, and is driven by regulations and programs that are distinguished from, and interrelated to, housing access. Medical and supportive services are inextricably linked to housing options for people with disabilities, and the existing regulatory and fiscal landscape of service programs are an integral counterpart of funding streams for permanent supportive housing development and operations. Outside of permanent supportive housing models, there are very few programs that coordinate and deliver services to people with disabilities (Manchester & Ponsor, 2023). Other critical and relevant sources for supporting permanent supportive housing include HOME rental assistance and Continuum of Care funding (Northrup et al., 2018).

A choice-centered policy approach intersects with care through the mandate of integration and supportive services. Aligned with this approach is the expansion of social security benefits to promote independence for individuals, caregivers, and families in residential settings. The mandate for providing appropriate services that promote integrated living to the fullest desired and possible extent was established in the *Olmstead v. The LC* ruling of 1999 (Lerch & Woodsby, 2023). This landmark case codified both the rights of disabled individuals to receive services in their own homes and the responsibilities for public agencies to ensure the delivery of these services. This mandate has helped facilitate the provision of Medicaid Home and Community Based Service (MHCBS) funds and Money Follows the Person (MPF) funds, and other supports that remain some of the largest funding sources that enable individuals with disabilities to afford and access adequate housing.

Programs developed through a choice-centered approach play a critical role in supporting federal, state, and local programs that relate to integration into community-based settings through publicly facilitated subsidies and supportive services. These funding sources often cannot be used to cover housing costs but are often necessary to afford all the related service needs and wants that make housing options possible for disabled renters to live independently, reaffirming the critical link between housing and service provision (Connery, 2016). Washington State, as part of its updated Olmstead Plan, dedicates additional funding towards rental assistance and the permanent supportive housing services and establishes critical unit and funding set-asides for housing development (HUD, 2025).

Access Approach

Access as a policy approach was defined by the movement for equal access and opportunity to public life, particularly emphasized in this thesis as it relates to the spatial and geographic dimensions of the built environment. Housing and social policy approaches were not responsive to the spatial and geographic exclusion of people with disabilities until the Disability Rights Movement gained political momentum through organized protest and advocacy, driven by disabled leaders in Community Based Organizations. While some state architectural codes were established with consideration to physical accessibility in the early 1960s, the 1968 Architectural

Barriers Act (ABA) requiring physical access to any federally funded buildings is generally considered the first federal disability policy in the United States (Pelka, 2018). Standards for accessibility and adaptation in multifamily dwellings were not established until the 1988 Fair Housing Amendments Act, two years after the creation of the Low Income Housing Tax Credit Program under the 1986 Tax Reform Act.

An emphasis on access was embodied in the passage of the Americans with Disabilities Act (ADA) of 1990, requiring accessibility across local, state, and federal government programs and expanding mandates for reasonable accommodations in private spaces. This was the first sweeping policy approach that recognized and attempted to address the spatial and geographical exclusion of people with disabilities through material regulation (Soldatic, Morgan, & Roulstone, 2014). The accessibility guidelines and mandates for accommodation establish the bare minimum requirements in housing provision which govern the LIHTC program.

The care, choice, and access-centered policy approaches characterize the current state of social welfare and housing policy. The patchwork of regulations and programs are remnants of the progression of political attitudes about how housing and physical space have considered, and failed to consider, the diverse experience of disability (Soldatic, Morgan, & Roulstone, 2014; Jacobs, 2019). The ongoing marginalization of disability converges with a deepening disinvestment in housing as a mechanism of social welfare to create the housing disparities that our communities currently face (Connery, 2016; Jacobs, 2019).

DEMOGRAPHIC TRENDS

In Washington, the current state of housing needs among people with disabilities is shaped by our current regulatory and funding landscape. People with disabilities are a growing constituency and among the groups with the worst case housing needs (NLIHC, 2025; Popkin et al., 2022). Worst case housing needs are defined by the Department of Housing and Urban Development (HUD) as the proportions of very low income households who pay more than half their income to afford rent, lacking either rental assistance or adequate housing conditions, or both (HUD, 2025). People with disabilities comprised about 14% of the population, nationally and in Washington State (Houtenville, Kingsbury & Thomas, 2026; CDC, 2026). Very low income households with a reported disabled member comprised 44% of those with worst case housing needs (HUD, 2025). See Figure 1 for a breakdown of worst case needs by prevalence and household type. While housing needs are worsening across all household types, the particular unmet housing needs faced by people with disabilities are complicated due to affordability constraints, accessibility issues, and implementation challenges with service provision and integration.

Exhibit 1-13. Worst Case Needs Among Households With People with Disabilities, 2023

	Families With Children	Older Adult Households	Other Family Households	Other Nonfamily Households	Total
Very low-income renter households (thousands)	**5,439**	**6,345**	**1,675**	**5,682**	**19,141**
Worst case needs (thousands)	2,333	2,462	874	2,795	8,464
Percentage with worst case needs	42.9	38.8	52.2	49.2	44.2
Percentage having people younger than 62 who have disabilities	17.3	2.4	26.7	28.2	16.4
Very low-income renter households having people younger than 62 who have disabilities (thousands)	**940**	**154**	**448**	**1,601**	**3,143**
Worst case needs (thousands)	345	57	175	585	1,162
Percentage with worst case needs	36.7	37.0	39.1	36.5	37.0

Source: HUD Office of Policy Development and Research tabulations of American Housing Survey data

FIGURE 2: Worst Cast Needs Among Households with People with Disabilities **(**HUD, 2025).

The prevalence of disability across a diversity of experiences is understood in policymaking across categories of impairment, diagnosis, or some general consideration for how people are able to carry out activities of daily living. It is nationally measured along narrowly established definitions, which are standardized in some major datasets along 6 categories: hearing, vision, ambulatory, cognitive, and independent living disabilities (Erickson, Lee, & von Shrader, 2026; Karpmann & Morriss, 2024). See Figure 2 for disability prevalence in Washington State according to these categories. Housing outcomes vary by State based on programs and population characteristics, and it is well documented that needs are going unmet for people with disabilities in Washington. Washington ranks 16th in the nation for disability housing assistance, in which 17.6% of people with disabilities who qualified for subsidized housing were not receiving it (AARP Public Policy Institute, 2021).

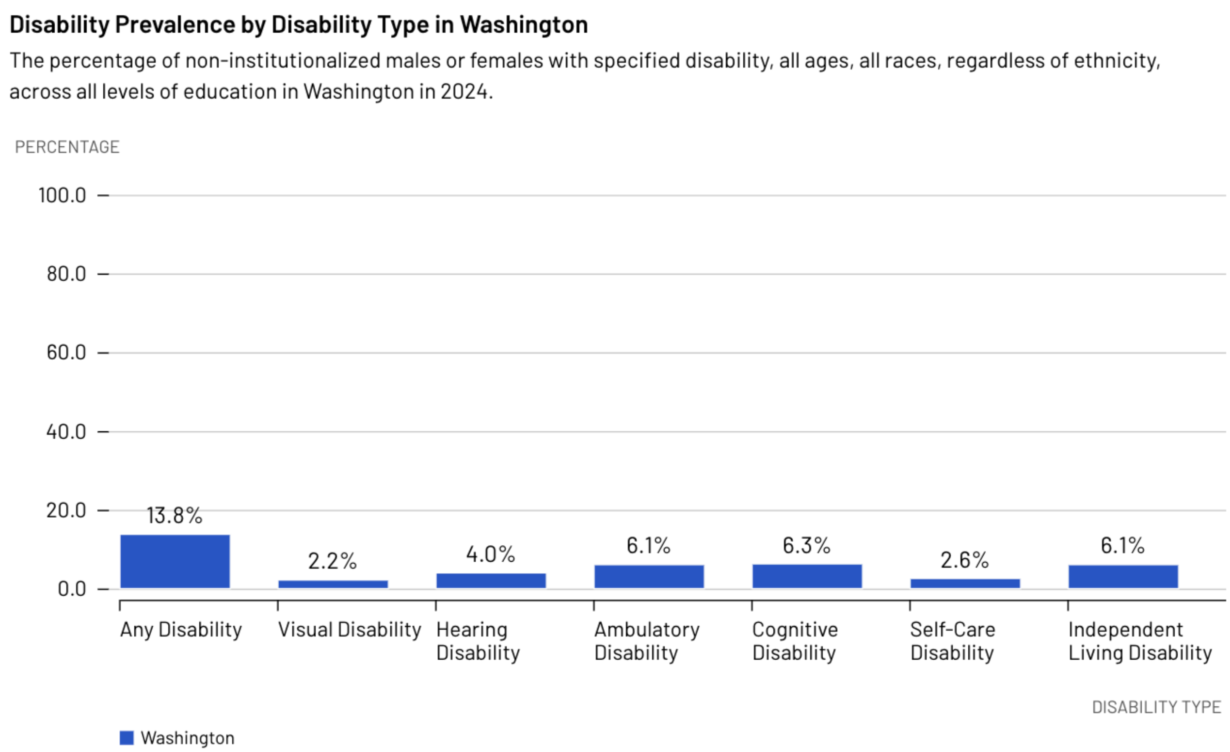


FIGURE 3: Disability prevalence in Washington State by Disability Type (Erickson, Lee, & von Shrader, 2026; Karpmann & Morriss, 2024)

Washington has recently focused additional resources on 167,000 residents with intellectual disabilities (IDD), nearly a fourth of whom (37,000 individuals) have unmet housing needs. At the national level, people with IDD are living longer and the population is expected to double by 2030, creating an urgent need for resources tailored to the specific support needs for this growing, aging population (Tamar, 2021; Hattendorf, 2025). Just under 1,400 units of the statewide affordable housing portfolio are set aside for this population (Office of the Secretary, 2022).

Intersecting Outcomes in Housing Disparities

Housing outcomes among people with disabilities interrelate with observable disparities that other historically marginalized groups face. Since disability onset can occur at any point in the lifespan, there are a multitude of marginalized communities whose outcomes intersect with, and are exacerbated by, the experience of living with a disability. This section considers some of these groups who experience worst case housing needs, and are often centered in housing policy priorities.

Income: Up to 22 percent of people with disabilities at both the federal level and in Washington State fall under extremely low income levels (NLIHC, 2025; Popkin et al., 2022). This constituency experiences lower rates of employment and educational attainment, and more reported difficulties paying for housing (Harkin, 2014; Karpmann & Morriss, 2024; NLIHC, 2025; Popkin et al., 2022). People with disabilities experience poverty at twice the rate of nondisabled populations (Harkin, 2014). Poverty status is also interrelated with disability status because one can be attributed to the development of another, and both interrelate with racialized outcomes (Goodman et al., 2019).

Age**:** It is well documented that disability correlates with aging and that the most elderly groups of adults experience disability the most frequently **(**Popkin et al., 2022). As the prevalence of disability increases with age, with increases in nearly a quarter of individuals with disabilities are over 75 years of age, and two thirds are over the age of 55 as shown in Figure 4 **(**Popkin et al., 2022).

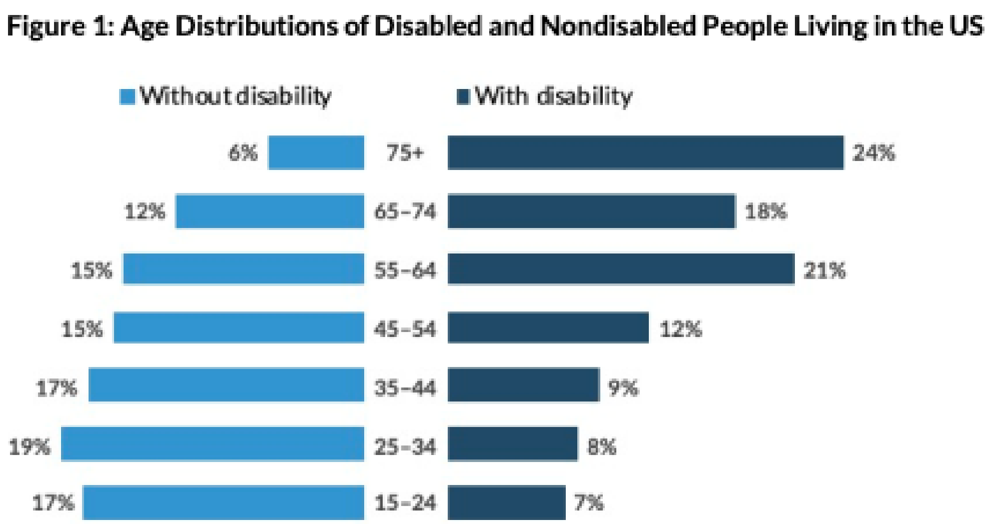


FIGURE 4: Age Distribution of Disabled and Nondisabled People Living in the US **(**Popkin et al., 2022).

Race: People with disabilities are more likely to be people of color and have lower incomes and poorer outcomes compared to white people with disabilities (Morris et al., 2019). Financial instability among the disabled population is felt more acutely in communities of color, and these disparities widen across the lifespan (Goodman et al., 2019). Racialized outcomes are especially evident for Black communities that see the highest prevalence of disability, a wider employment gap between disabled and nondisabled populations (Morris et al., 2019). In Washington, disability status is overrepresented among Native American, Latino, and Asian American and

Pacific Islander communities, while the representation of these communities is not well understood in the State's affordable housing projects (CDC, 2026).

Homelessness: Those with disabilities experience homelessness at over double the rate of nondisabled populations (Henry et al., 2020). About half of all individuals experiencing homelessness also live with a disability (Henry et al., 2020). People experiencing homelessness are also more likely to have higher complex behavioral health needs that can relate to underdiagnosed or undertreated disability. Disability correlates with higher rates of mental distress, and Washington State has the highest proportion of people with disabilities experiencing frequent mental distress (Buckley et al., 2020; Aller et al., 2024).

HOUSING NEED IN WASHINGTON STATE

Washington State faces a rental housing crisis that uniquely and disproportionately impacts people with disabilities. Challenges faced by people with disabilities can be broadly understood as falling into three intersecting categories of affordability, integration, and accessibility.

Affordability

In contemporary housing literature and policy development, affordability is defined as a relationship between income and housing costs that is used in administrative criteria to define housing worst case needs and eligibility for supportive programs (Hulchanski, 1995; HUD, 2025). Housing affordability challenges have persisted and worsened for low income renters across many different groups, including people with disabilities (HUD, 2025). While pervasive across the private and publicly subsidized housing stock, affordability concerns uniquely impact people with disabilities, who disproportionately face income constraints and higher costs for quality of life and accessible housing.

It is well understood that people with disabilities often face income constraints that impede housing affordability, both nationally and in Washington State. Housing service providers observe that some individuals are forced to live in cost-burdened housing units, falling behind on rent payments and facing eviction due to the lack of affordable rents or alternative supports (King, 2023). Some scholarship suggests that lack of housing affordability has a worsening effect on mental health for people with disabilities (Kavanagh et al., 2016).

One of the largest affordability concerns that have been identified by advocates is the reliance on Social Security Income (SSI). People with disabilities are among the populations that are more likely to rely on SSI as their sole source of income than nondisabled populations (Schaak, 2017; Popkin et al., 2017). Analysis of national market trends demonstrates that across the nation there is no rental market that is affordable to households solely reliant on SSI (Schaak, 2017). In Washington State, the rental rate for a one-bedroom apartment is nearly double the monthly SSI payment, a cost burden that is most exacerbated in major urbanized areas such as the Seattle-Bellevue metro area, the Olympia-Tumwater area, Bremerton-Silverdale and Tacoma (See Figure 5) (Schaak, 2017).

HOUSING MARKET AREA	SSI MONTHLY PAYMENT	SSI AS % OF MEDIAN INCOME	% SSI FOR 1-BEDROOM APT.	% SSI FOR EFFICIENCY APT.
Bellingham	$1,005.25	16.30%	137%	134%
Bremerton-Silverdale	$1,005.25	14.40%	156%	140%
Kennewick-Richland	$1,005.25	17.20%	123%	110%
Lewiston*	$1,005.25	20.40%	92%	91%
Longview	$1,005.25	19.10%	118%	96%
Mount Vernon-Anacortes	$1,005.25	17.20%	129%	116%
Olympia-Tumwater	$1,005.25	15.30%	158%	139%
Portland-Vancouver-Hillsboro*	$1,005.25	14.60%	177%	164%
Seattle-Bellevue	$1,005.25	11.40%	228%	223%
Spokane	$1,005.25	17.60%	112%	99%
Stevens County	$1,005.25	19.10%	82%	82%
Tacoma	$1,005.25	14.90%	166%	147%
Walla Walla	$1,005.25	19.10%	113%	101%
Wenatchee	$1,005.25	18.60%	113%	101%
Yakima	$1,005.25	19.10%	101%	101%
Statewide Non-MSA	$1,005.25	19.10%	97%	89%
Statewide	$1,005.25	14.90%	178%	169%
National	$1,009.24	17.70%	145%	135%

FIGURE 5: 2025 Housing Rental Market Rates and SSI Analysis (Schaak et. al., 2021)

SSI requirements have specific limitations regarding assets and income, requiring individuals to own no more than $2,000 in assets, and no more than $3,000 for couples (King, 2023; Heard, 2023). In 2014, Achieving A Better Life Experience (ABLE) bank accounts were created to support wealth and finance outside of asset limitations, but these accounts also come with restrictions on age of disability onset (Heard, 2023). Placing conditions and limits on additional income while housing costs exceed benefits contributes to systematic impoverishment and limited choices for individuals who face additional barriers to finding housing (King, 2023).

While other populations also rely on SSI as a critical income source and face similar affordability challenges, such as older adults and very low income renters, renters with disabilities face even more costs associated with the realities of living with a disability. Some academic works identify the hidden costs that are entangled with income constraints for individuals with disabilities, such as unpaid household labor or spending substitutes for household labor that can reduce a household's budget capacity (Merchant, Troland, & Weber, 2025) Households containing one adult with a workforce participation-preventing disability pay 29% more than households without a disabled family member to secure the same standards of living (Morris et al., 2021). The reliance on SSI as a sole source of income demonstrates the need for rental assistance through capital funds.

Accessibility

In addition to income constraints and hidden costs of living with a disability, it is well established nationally and in Washington that renters with disabilities have fewer options and face higher costs for finding rental units that meet a variety of physical access needs. Some scholarship has confirmed what disability scholars have posed about the physical exclusion and disadvantage that is embedded in the built environment (Clark & George, 2005; Wahl et al., 2009). Measures of disability that capture self care and independent living disabilities have suggested that the built environment, within and beyond housing, can have a disabling effect on individuals with disabilities, at a prevalence rate of 33% of the disabled population (Annual Disability Statistics Compendium, 2025). There is a wealth of empirical evidence and academic works that pose the built environment as an intervening factor that can exacerbate the prevalence of disability and disparities in socioeconomic outcomes such as housing tenure (Clark & George, 2005; Wahl et al., 2009).

As disability prevalence is also associated with aging, physical accessibility needs are expected to increase alongside an overall aging population (Scheckler, Molinsky, & Airgood-Obrycki, 2022). The most frequent housing concerns among older adults with disabilities, based on available measures, were entering the home and navigating to the bathroom (Scheckler, Molinsky, & Airgood-Obrycki, 2022).

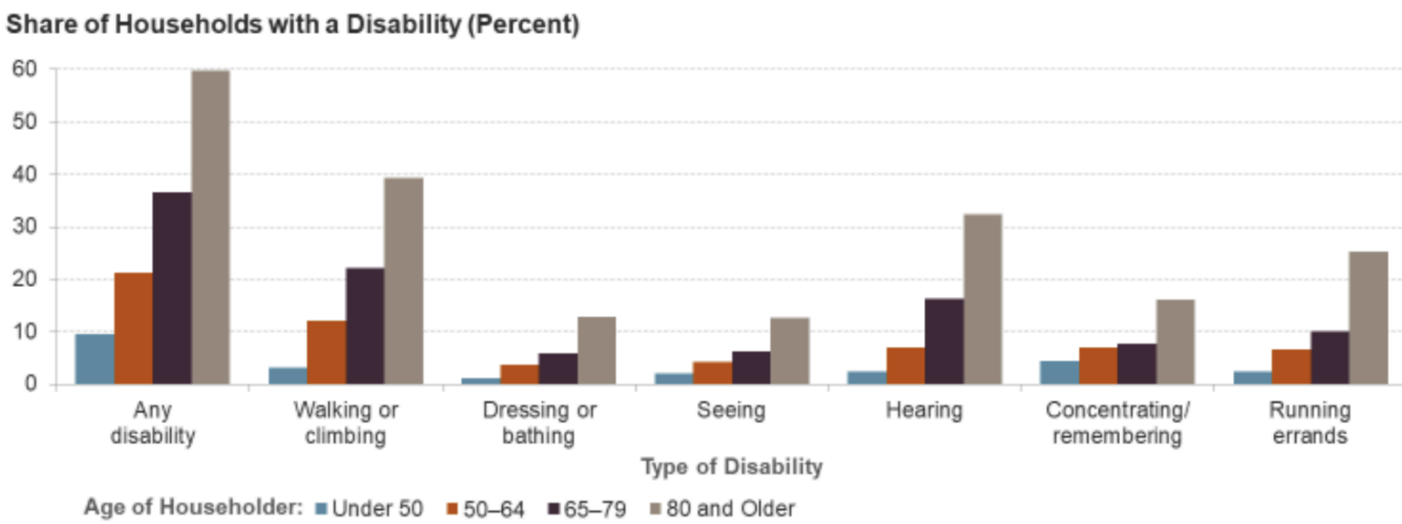


FIGURE 6: Share of Households with a Disability (Scheckler, Molinsky, & Airgood-Obrycki, 2022)

In Washington State, individuals with disabilities describe challenges in finding housing that is both physically accessible, affordable, and accepting of housing assistance (Disability Rights Washington, 2023). Housing specifications and higher housing costs are among the direct costs associated with living with a disability (Goodman & Morris, 2020). In Washington State, survey respondents describe that already expensive housing is even more expensive to accommodate their accessibility needs (Affordable Housing Advisory Board Housing Advisory Plan, 2023). Physical access needs include a two-pronged consideration of both physical accessibility design considerations within housing units, and proximity to transportation and essential neighborhood services and amenities.

Physical Accessibility: In housing units, people with disabilities may require a specific and diverse range of physical access considerations that span across different types of ability needs. Nearly a third of adults with disabilities live in housing built after 1990, when the Americans with Disabilities Act and design standards were implemented, and nearly 40% in Washington State (Annual Disability Statistics Compendium, 2025). Despite federal requirements that establish baseline accessibility requirements, there is a consensus among disability advocates that these minimum standards do not enable accessibility across different types of disabilities (Clarke, 2005; Oliver et al., 2025). Most standards, and related existing analyses, consider accessibility for some established categories of disability but not others, with an emphasis on physical mobility and a relative scarcity of standardization and evaluation of physical access for people with cognitive, sensory, visual, self care, independent living, or hearing disabilities.

Physical inaccessibility is a major barrier for people with disabilities when choosing a living situation. Nationwide, 6% of households, or 6.9 million people, reported a family member with at least one accessibility challenge at home such as accessing and using entrances, kitchens, or bathrooms (SP Group LLC, 2021). Regarding mobility accessibility, 2011 American Housing Survey data suggests that less than 5% of the US housing stock is accessible for individuals with moderate mobility difficulties, less than 1% is accessible for wheelchair users (Bo'sher et al., 2015). Only about a third of all housing options are potentially modifiable (Bo'sher et al., 2015). Data from the 2019 American Housing Survey demonstrates that of the households that would find an entry level bathroom and bedroom beneficial, only 4 in 10 households have a feature (SP Group LLC, 2021).

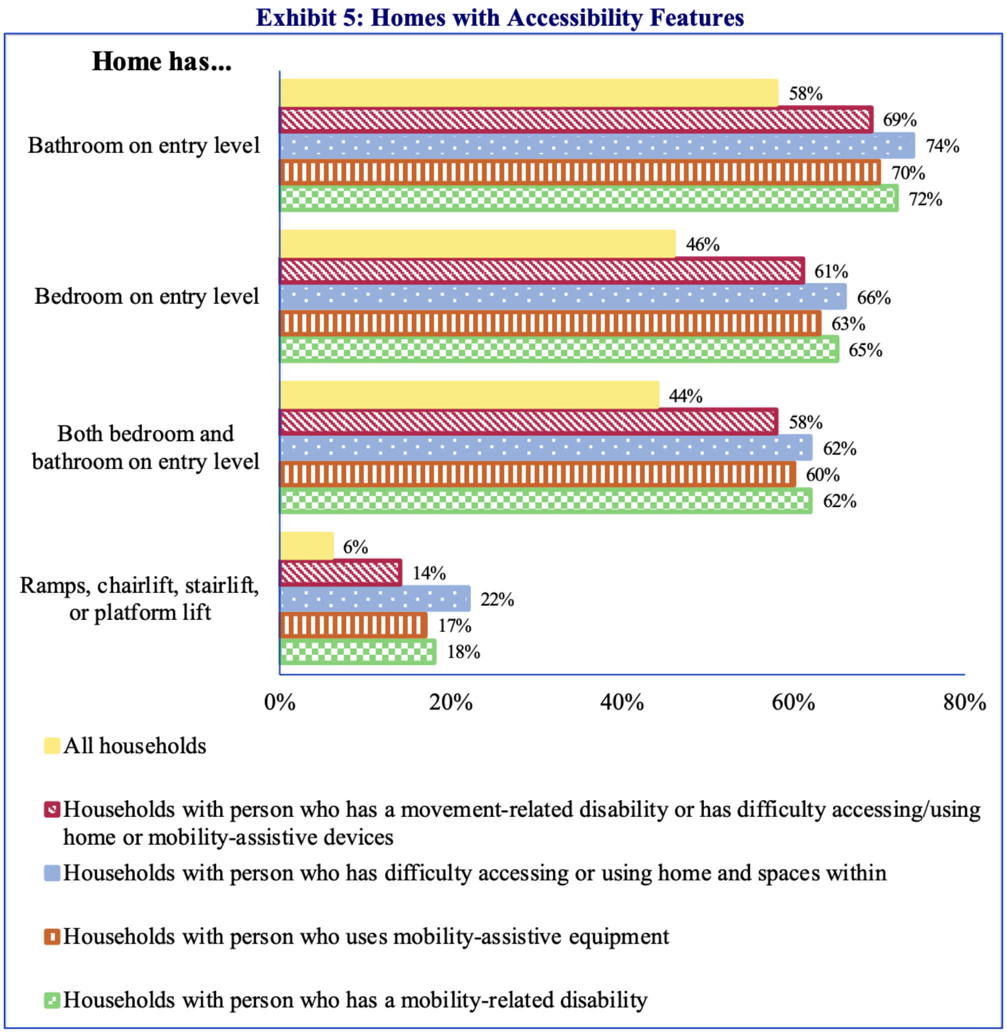


FIGURE 7: Homes with Accessibility Features (SP Group LLC, 2021)

The accessibility features collected in the AHS survey dataset consider aspects of physical mobility in the rental market, demonstrating that some features least prevalent include widened doors and hallways, ramps, door handles, raised toilets, built-in shower seats, and elevators (Figure 4) (Bo'sher et al., 2015). Only about a third of all housing options are potentially modifiable due to permanent limitations; for example, an unspecified portion of the housing stock is impossible to physically modify because the layout fails to enable a turn radius for users of mobility aids such as wheelchairs and walkers (Bo'sher et al., 2015).

Table 5. Prevalence of Accessibility Features

Accessibility Features Present in Home	All Housing Units (Including Vacant Units)	All Renter-Occupied Units	All Owner-Occupied Units	All Multifamily Units[2]	Multifamily Units Built Before 1990	Multifamily Units Built In 1990 or Later
Original Accessibility Features						
Can Enter Unit Without Steps	42.0%	38.6%	44.4%	38.8%	36.1%	49.3%
Extra-Wide Doors/Hallways	7.9%	6.5%	8.8%	8.0%	5.5%	17.4%
No Steps Between Rooms	65.5%	72.1%	61.5%	77.3%	77.0%	78.6%
Ramps In Home	1.0%	0.7%	1.1%	0.7%	0.7%	0.9%
Hand Rails/Grab Bars In Home	25.9%	15.0%	32.4%	11.1%	10.7%	13.0%
Handrails/Grab Bars In Bathroom	17.8%	15.9%	19.4%	17.8%	16.0%	24.5%
Handrails/Grab Bars In Other Areas	2.5%	1.5%	2.9%	1.6%	1.4%	2.4%
Door Handles Instead of Knobs	11.0%	8.4%	12.7%	11.1%	7.4%	25.4%
Sink Handles/Levers	27.9%	20.6%	33.0%	21.5%	17.9%	35.2%
Built-In Shower Seats	8.3%	4.0%	11.0%	4.1%	3.3%	7.0%
Raised Toilets	6.7%	3.7%	8.6%	4.1%	3.4%	6.8%
Kitchen Trays/Lazy Susans	18.5%	7.9%	25.3%	7.2%	5.9%	11.9%
Wheelchair Accessible Electrical Outlets	62.9%	59.5%	66.6%	58.8%	56.4%	68.4%
Wheelchair Accessible Electrical Switches	64.2%	60.3%	68.3%	59.6%	57.2%	68.7%
Wheelchair Accessible Climate Controls	47.0%	44.0%	50.2%	43.8%	40.6%	56.1%
Wheelchair Accessible Kitchen Cabinets	15.8%	15.0%	17.1%	14.5%	14.0%	16.4%
Wheelchair Accessible Countertops	51.0%	47.9%	54.9%	46.8%	44.7%	55.0%
Wheelchair Accessible Other Kitchen Features	29.9%	28.2%	32.5%	26.8%	25.4%	32.1%
Wheelchair Accessible Bathroom	39.3%	37.3%	42.5%	37.8%	34.5%	50.3%
Elevators In Home	0.4%	0.4%	0.4%	0.6%	0.6%	0.6%
Bedroom On Entry Level	76.3%	78.8%	73.5%	77.9%	77.5%	79.4%
Full Bathroom On Entry Level	87.7%	85.0%	88.8%	82.8%	82.3%	84.8%

FIGURE 8: Prevalence of Accessibility Features (Bo'sher et al., 2015).

Transportation Accessibility: Scholarship on disability justice advocates that accessibility considerations related to housing outcomes go beyond in-unit design considerations, also emphasizing the critical importance of proximity to essential needs that can enable people with disabilities to access appropriate transportation options and services. Disability justice advocates also link housing affordability to transportation equity and accessibility (Stacy et al., 2020). Compared to non-disabled populations, people with disabilities are twice as likely to lack adequate access to transportation. People with disabilities experience indirect social costs of transportation inequity more acutely, outcomes which also overlap with racial inequity (Sanchez

& Brenman, 2018). In Washington, community members with disabilities describe a struggle to find housing that is affordable in places with reliable and timely public transportation, adequate infrastructure, which is also close to services, necessities, and desired amenities (Disability Rights Washington, 2023).

Integration and Service Provision

In addition to affordability and accessibility concerns, the ability of people with disabilities to access appropriate and desired housing settings is uniquely constrained by the legacy of institutionalization and a systematic failure to promote the mandate of community integration. Since the *Olmstead v. LC* Supreme Court ruling of 1999, housing opportunities must reflect the right of people with disabilities to live in community settings among nondisabled populations and State governments are mandated to plan for and deliver adequate housing that serves a mix of people with and without disabilities, including the provision of medical and social services that live in community based settings to the fullest extent possible (Olmstead v. LC, 1999).

There is a tension between the entitlements guaranteed in the Olmstead Mandate and the scarcity of institutional resources to provide the necessary services and support to ensure these entitlements. Inadequate funding, caregiving shortages, and a lack of adequate accommodations for service needs for people with disabilities can create significant barriers to accessing the level of integrated, independent housing that would otherwise be possible and desired by people with disabilities on top of already challenging supply shortages and constraints in affordability and accessibility. Results from the National Core Indicators survey from developmental disabilities agencies indicate that individuals with disabilities who lived in their own homes had the highest rates of self-reported choice compared to people living in institutional settings (Bradley, 1997).

The largest public programs to promote integration are employed federally through Medicaid Home and Community Based Services (HCBS) and Long Term Supportive Services (LTSS). HCBS provides a variety of medical and person-centered services for at-home care through waivers, including (Murad et al., 2022). States are required under the Affordable Care Act to develop systems that support independence, but 4 in 5 program users describe unmet needs with caregiving, daily activities, housing modifications, and transportation (Caldwell et al., 2026). HCBS includes a wide range of supports, such as personal assistance, day services, employment supports, transportation, home modifications and enabling technologies, family caregiver supports, health and behavioral supports, and service coordination and navigation. Nearly 700,000 people with disabilities nationwide remain on waiting lists for Home and Community-Based Service programs (KFF, 2025). Washington ranks 41st in the nation in the extent of Home and Community-Based Services waivers for people with IDD (Braddock et al., 2017).

Scarce resources make it difficult and uncommon to access the care that is needed to live independently. Some housing and social service professionals in the field note that it is "very rare" for people with developmental and other disabilities to find housing options without public and community-based navigators to connect the appropriate resources (King, 2023). When faced with housing and caregiving service shortages, individuals are often placed in group homes or institutions against their wishes (King, 2023). Nationwide, over 1.2 million people with disabilities who expressed interest in living independently as mandated under the *Olmstead* ruling remain in institutionalized settings due to the lack of housing that includes supportive services (KFF, 2025). Institutionalized care settings can fail to address the needs and promote autonomy for people with disabilities, eroding self advocacy and negatively impacting mental health (King, 2023). People with disabilities tend to live alone at higher rates than nondisabled people, but many adults with disabilities live with a caregiver or family member and may be more vulnerable to housing insecurity as their caregiver ages (Popkin et al., 2021). There is a lack of qualitative data on housing choice and preferences among people with disabilities, but some reports suggest that many individuals with disabilities would prefer to live independently from caregivers or group home settings but face access barriers and limited options (Popkin et al., 2021).. The State mandate of community integration and promotion of self-determination in housing options face significant barriers in affordability, accessibility, and service provision.

THE LIHTC PROGRAM IN WASHINGTON STATE

The affordable rental housing crisis is predominantly caused by both a lack of overall supply and a lack of targeted subsidy for specific populations, the market failures of which are addressed by the public sector through the provision and coordination of numerous programs that expand the stock of affordable housing. Most of these strategies include tax credits, bonds, vouchers, incentives, deregulation, and public-private partnerships, in addition to the related supportive services, income assistance programs, and rental subsidies mentioned above that support targeted affordability for specific populations. Many types of public, private, and partnered interventions are layered to produce, preserve, and subsidize affordable housing. Among the most prevalent of these programs in the United States is the Low Income Housing Tax Credit (LIHTC) program.

The LIHTC has financed over 3 million units nationwide since its creation in 1986, and over 57,000 units in Washington State (HUD, 2026). It is often considered the predominant program for developing affordable housing in the United States, introduced by the Reagan Administration in the Tax Reform Act of 1986 as part of a larger trend of neoliberal disinvestment in public housing services and the commodification of housing provision by private institutions (Tax Reform Act, 1986; Reid, 2025; Jacobs, 2019). In essence, the tax credit incentivizes for-profit, private sector investment in low income housing by providing them with a dollar-for-dollar reduction in their federal tax liability in exchange for providing financing to develop affordable rental housing. The highly complex tax incentive is associated with private equity firms, large private and public financial institutions, and a professionalized industry of public and private implementers who work in specialized roles to administer the allocation and compliance requirements that govern the tax credit. Units in a LIHTC-financed project are guaranteed at a level of relative affordability based on the Area Median Income (AMI), determined by HUD using census data, for 15-30 years (Freemark & Scally, 2023). Affordability levels in LIHTC projects start at 80% of AMI, and are subsidized as low as 30% of AMI using respective tax credit equity from a 4% tax credit and a 9% tax credit with different tests aimed at ensuring that at least 40% of the units are restricted to household earning 60% AMI or less, 20% at 50% or less and an average income below 60% AMI. The 4% tax credit equity is paired with tax exempt private activity bonds, and 9% tax credit equity is often paired with vouchers and other federal and state rental assistance programs to deliver permanent supportive housing.

Affordable housing developers must assemble a complex, piecemeal capital stack of private, public, and philanthropic funds along with debt to demonstrate the feasibility of a project before applying for tax credits. The program's highly complex nature and numerous funding sources is an established topic for discussion in the literature but not discussed at length in this thesis, although it is noteworthy that people with disabilities are among special needs populations that tend to incorporate more than three additional funding sources to a given project (Reid, 2025). Equity from tax credits on their own cannot develop affordable housing, but instead projects funded by tax credits rely on an average of 7 total funding sources (Reid, 2025). 76% of LIHTC projects funded from 2020-2023 involved at least two additional public funding sources including HUD HOME funding and Community Development Block Grants, 32% of projects involving at least two state level funding sources (Reid, 2025). The typical development timeline for an affordable housing project ranges from 4-7 years, but projects serving disability face a more variable timeline of 3-10 years (The Kelsey, 2026). Each additional funding source adds time, cost, and requirements to the development process, demonstrating the particular challenge of piecing together funding that is tailored to the deeper affordability needs of renters with disabilities.

One notable feature of bond/4% LIHTC projects is the “50% test,” an IRS funding eligibility requirement that requires projects using tax-exempt sources to be funded through tax exempt funding sources (Abbott, 2025). If tax-exempt bonds are part of the capital stack of the project, then they must comprise at least 50% of the cost of the project elements that are included in the calculations for the tax credit (Abbott, 2025). This requirement adds complexity and cost to projects, especially when bond financing is limited. In 2025, the One Big Beautiful Bill Act lowered this requirement to 25%, easing this funding constraint by allowing public funders to spread available bond financing resources across more projects (Abbott, 2025). In a scarce public funding environment, however, there will be a higher need for more alternative sources of funding to assemble the necessary capital stack (Abbott, 2025).

People with disabilities are underrepresented within LIHTC tenants (making up about 14% of the national population but represented in about 8% of LIHTC households), although they face barriers to housing and are likely to be income qualified, suggesting a gap in understanding and action for how best to include and prioritize renters with disabilities (HUD

2026). Disabled renters are represented in about 8% of LIHTC households Federal tax credits are administered by State Housing Finance Agencies (HFAs), who determine priorities through Qualified Allocation Plans (QAPs). Under federal constraints, State QAPs are required to determine how tax credits are allocated with consideration of low income tenants and qualified census tracts. Other priorities are set in QAPs through threshold requirements, set-asides, and competitive point incentives, based on policymaking processes that vary by state and program.

While the challenges and inefficiencies of this housing provision strategy are well-documented and manifold, the program's prevalence and the priorities of the Trump Administration indicate that not only is the program not going anywhere anytime soon, but its influence will likely continue to grow among the deprioritization of other public sector housing affordability strategies. This thesis identifies the most relevant issues of the LIHTC program as they relate to housing provision for people with disabilities. A review of existing literature and advocacy from disability scholars has identified three most pressing challenges, where there is either little data or few pathways for action: affordability, disability-focused prioritization, and designing for physical accessibility.

Affordability in LIHTC Developments

LIHTC programs, and other programs frequently used to subsidize LIHTC-funded units, are rent restricted based on AMI limits set by HUD, which are often mismatched to local needs and the realities of tenants. LIHTC units are often set as a mix of 30-80% AMI based on operations needs, available assistance, and unit mixes. The rent does not change based on a person's income, as in other programs, but many tenants earn much lower incomes than the designated threshold of units, resulting in rent burdens (Emmanuel, 2020). A 2026 analysis of Washington State's 9% tax credit portfolio revealed a significant mismatch between income restrictions and actual incomes among tenants, with subsidies playing a critical role in addressing rent burden (WSHFC, 2026).

Properties funded through the LIHTC program are eligible to apply for Section 811 vouchers and capital funding programs, and some projects also set-aside units to receive project-based vouchers as the predominant strategy for ensuring deeper affordability (Northrup et al., 2018). The Section 811 program in Washington State is administered across 3 regions by housing authorities and private entities, each managing their own waitlist. Some benefits, such as SSI income, can prevent prospective renters from qualifying for affordable units and public assistance programs, although this income is still insufficient to find affordable and accessible options elsewhere. Washington is among 17 States where the cost of a market rate 1-bedroom is higher than monthly SSI payments, although there is a lack of analysis specific to the cost burdens of rent restrictions across the spectrum of AMI ratios used in affordable units (Cooper et al., 2015). Despite the prevalence of the LIHTC program as a tool for developing low income housing, people with disabilities are underrepresented in LIHTC building tenancy, and there is a gap in the literature on how the unique needs and wants of people with disabilities are reflected in LIHTC priorities (HUD, 2026).

Disability Priorities in LIHTC

In Washington State, the QAP is allocated by the Washington State Housing Finance Commission (WSHFC) and includes a statement that it will give weight to projects that, "set aside units for special needs populations, such as large households, the elderly, the homeless and/or the disabled" (WSHFC, 2012). However, according to an expert at the state HFA interviewed as part of this project, the Washington State Housing Finance Commission, the QAP approval process is administratively burdensome to the agency since policy updates require sign off from the Governor. Instead of updating the 2012 QAP to reflect development and population priorities, the WSHFC codifies its priorities in its program policies, which are approved as needed by the Board of Commissioners, enabling more responsive and distinct priorities between the 4% and 9% tax credit programs.

For the 9% tax credit, 10 additional points are awarded to projects that set aside 20% of the total housing units for people with disabilities. For projects with a mix of both affordable and market-rate units, projects are allowed to set aside both market rate and affordable units. For the 4% tax credit, the program requires a minimum 10% population set aside for either people with disabilities or large households. In the bond/4% tax credit program, a 10% set aside for people with disabilities is a threshold requirement of all projects. Neither the QAP nor the program policies for either tax credit include an incentive or requirement for physical accessibility standards.

Among advocates for inclusive, accessible housing, there is a growing understanding of the significance of the LIHTC as an unaddressed policy tool to implement a targeted prioritization for the needs and wants of renters with disabilities. The call for more stable funding and targeted housing solutions has sounded across many predominant disability housing advocacy organizations. In 2010, the National Council on Disability advocated for point incentives for targeting low income housing units for people with disabilities earning incomes below 30% of the local area median income; including visitability features, universal design features, and ensuring integration with non-disabled populations by placing a cap on the proportion of unit set-asides (National Council on Disability, 2010). Researchers at the Urban Institute advocated for deeper subsidies and incentives that more specifically target people with disabilities (Popkin et al., 2022).

Physical Accessibility in Federally Funded Buildings

Overlapping federal policies place minimum design standard requirements, including the ADA and Section 504 of the Rehabilitation Act, and vary in their application depending on building use and federal funds involved (Figure 5) (Bo'sher et al., 2015). Under Section 504, at least 5% of all units built using federal funds are required to be accessible to people with mobility disabilities, and at least 2% are required to be accessible for individuals with visual and hearing disabilities (HUD, 2010). Accessibility standards are related to the ADA provisions. These figures are not proportional to need, nor does existing policy mandate uses real time demographic information about the diversity and prevalence of disability to inform priorities for developing new housing that aligns with ADA congruent accessibility standards.

As multiple federal policies intersect to impose accessibility standards, it is not immediately apparent how these regulations impact the LIHTC program. Section 504 of the Rehabilitation Act prohibits discrimination against people with disabilities in any program, service, or activity, and imposes specific accessibility requirements on federally funded buildings (Rehabilitation Act, 1973). Both public and private housing providers are required to provide reasonable accommodations and modifications and cannot discriminate. Public housing providers are required to pay for reasonable modifications, promote affirmative marketing to the public, and provide housing that is as integrated as is appropriate (Cowing, 2010). Section 504 includes a specific set aside requirement for buildings to have 5% of units set aside for people with mobility disabilities, and 2% of units set aside for people with visual and auditory disabilities. As a federal tax credit and not a direct federal subsidy, the LIHTC program is not technically subject to the non-discrimination and accessibility requirements of the FHA Section 504, meaning that only common spaces, rather than units, are subject to the physical requirements of the ADA (Cowing, 2010; Johnson, 2025). When paired with any other source of public funds such as rental assistance or vouchers, LIHTC units are required to comply with Section 504 requirements (Johnson, 2025). Federal and state loan programs are also considered federal financial assistance, subjecting housing projects to these requirements (Cowing, 2010). Figure 9 includes a matrix that further defines which housing types are required to comply between the ADA, Section 504, and the Architectural Barriers Act, and how each of these requirements are enforced.

	Americans with Disability Act	Fair Housing Act	Architectural Barriers Act
Applies to	Public housing, student and faculty housing, employee housing, nursing homes, temporary housing provided in emergencies, and social service facilities, such as homeless shelters and halfway houses.	"Covered multifamily buildings," which are defined as buildings with four or more dwelling units constructed for first occupancy on or after March 13, 1991. Includes both public and private dwellings.	Facilities built, altered, or leased with certain federal funds, including public housing and prisons.
Does not apply to	Privately owned or leased housing, including single-family homes, condominiums, or apartments.	Single-family, two-family, and three-family homes.	Developments which are not financed using federal funds.
Guidance documents	The ADA Accessibility Guidelines (ADAAG) are legal requirements imposed on all parties responsible for housing that is covered by the Act. <u>Other guidance:</u> ADA Checklist for Readily Achievable Barrier Removal by the Institute for Human Centered Design.	The FHA Guidelines are legal requirements imposed on all parties responsible for housing that is covered by the Act. <u>Other guidance</u>: Equal Right Center's Fair Housing Act Checklist: A Guide to Accessible Design and Construction Compliance.	ABA Accessibility Standards are legal requirements imposed on all parties responsible for housing that is covered by the Act. <u>Other guidance:</u> HUD USFA accessibility checklist.
Enforcement	ADA standards are enforced only by the U.S. Department of Justice (DOJ) Disability Rights Section litigation. State and local governments are not authorized to receive or address complaints about ADA compliance. Entities covered by the ADA are responsible for their own compliance. The DOJ has responded to around a dozen requests from States to certify that their state codes full meet or exceed the ADA which reduces compliance burdens for builders.	FHA standards are enforced only by the Department of Housing and Urban Development (HUD) which receives complaints and engage in litigation. 38 states are recognized as having "substantially similar" laws to the FHA and HUD provides funding to agencies in these states to investigate and resolve FHA complaints in the first instance.	The United States Access Board investigates complaints about the ABA.

FIGURE 9: Summary of United States Federal Housing Regulations (Bo'sher et al., 2015).

It is not well understood how LIHTC QAPs incentivize accessible design considerations for people with disabilities beyond minimum requirements. Some state and local funders can have higher design standards and population set-asides than the state-level tax credit policies which must be adhered to by LIHTC projects in these jurisdictions, although there is a lack of comprehensive literature that explores the extent of these requirements below the national level (Herrera-Mcfarland, 2025). While a variety of literature exists on elements of inclusive and accessible design in residential units, little literature has explored the extent to which LIHTC-funded units and common spaces comply with, or go beyond, accessibility requirements (Müller et al., 2022). Beyond a high level comparison of the requirements as they relate to Section 504, there is little literature or standardized criterion for evaluating the QAP priorities among states as they relate to serving people with accessibility needs (Gustafson & Walker, 2002; California Tax Credit Allocation Committee, 2019).

According to one report from The Kelsey, 19 state HFAs lack any requirement or incentive for accessible design and only 7 states include requirements that are less than what Section 504 requires, including Washington (Herrera-Mcfarland, 2025). Of the states that include requirements, 9 provide non-mandatory incentives and 13 states include requirements exceeding the minimum requirements as established within Section 504 of the Fair Housing Act (Herrera-Mcfarland, 2025). California and Illinois are the only two states to include accessibility requirements that go beyond the Section 504 requirements. In this analysis, some states are identified as having requirements below the Section 504 requirements due to unclear language in the QAPs, including Washington State (Herrera-Mcfarland, 2025). The QAP in Washington State does not explicitly include the mobility and sensory unit set aside requirements included in Section 504 (Washington State Housing Finance Commission, 2012). Figure 9 visualizes which States include specific language regarding the accessibility requirements.

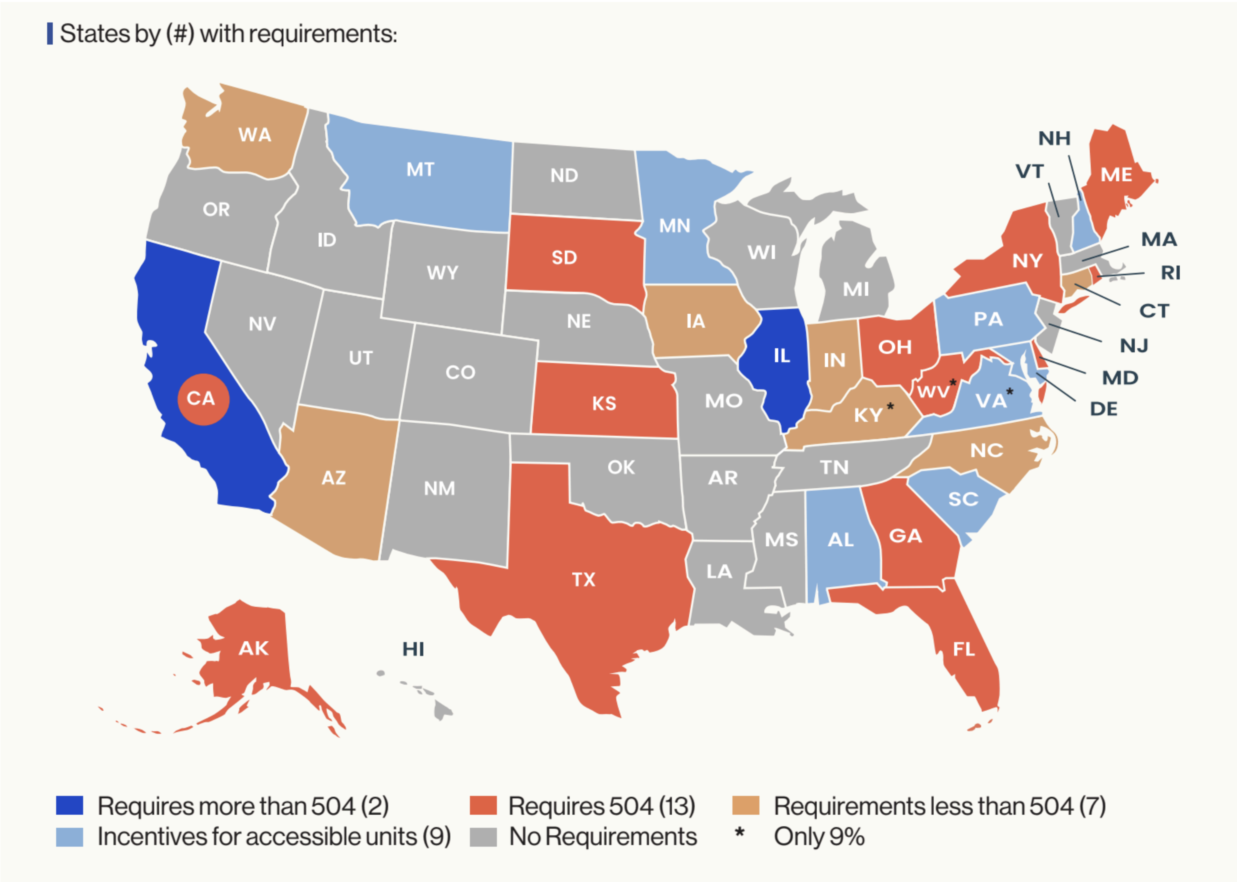


FIGURE 10: States with Accessibility Requirements in Qualified Allocation Plans (Herrera-Macfarland, 2025)

BY AND FOR: THE ROLE OF CBOs

Community-Based Organizations have been critical advocates and service providers since the inception of the Independent Living movement of the 1960s and continue to influence policy decisions. Advocates for affordable housing development across community groups have increasingly called for policymakers to consider, uplift, and share power with individuals who have lived experience in communities affected by past and present policies. The importance of centering and recognizing the pivotal role of individuals with disabilities in policy development and decision making has been among the core principles of the Disability Justice Movement (Hill O'Connor & Bennet, 2025). Lived experience among individuals with disabilities can encompass individual experiences of social and systemic settings as well as common understandings and collective knowledge. In policymaking, lived experience is often defined as targeting marginalized perspectives, in this context calling to attention the explicit and implicit impacts of structural ableism as a hierarchy of body and mind. This hierarchy prevails in existing systems of social policy and understandings of how the built environment is intended to function (Bernandino, 2025).

The role of CBOs in policymaking is well-established in literature, and CBOs are increasingly centered in housing development as frontline service providers and trusted messengers that can contribute to responsive and effective policymaking. Disability-focused CBOs are also gaining recognition for the pivotal role they can play in establishing and promoting an evolving cultural understanding of disability diversity (Bernandino, 2025). These organizations demonstrate how to implement cross-disability approaches and promote inclusive socioeconomic policy (Bernandino, 2025). As concepts of participatory policymaking have gained momentum in Washington State, multiple public agencies have sought to promote the role of CBOs, or "By and For" organizations, such as the State Department of Commerce, Snohomish County, and the Washington State Housing Finance Commission (WSHFC). By and For organizations (interchangeably referred to as CBOs) are defined as organizations that are operated and substantially led by marginalized groups whom they serve, embodying the cultural values of the communities they are based in. These definitions include people with disabilities as one of the intended marginalized groups that should qualify for and benefit from "By and For" centered policy strategies, which can include targeted funding, preference, or mandated inclusion. The Commission program policies define that a CBO serves a specific geographic community or identity-based community.

Within the tax credit programs, there is a requirement that 10% of tax credits be awarded to nonprofit developers to ensure that a baseline amount of tax credit equity is accessible, can be beneficial to a proportion of community-based entities whose missions involve housing development, ownership, and operations. Beyond this federal requirement, there is a scarcity of available aggregated literature on trends in state-level requirements or incentives for promoting the involvement of community members, or community-based entities, in developing or implementing the priorities in the tax credit programs to better meet community needs. Washington state, as one apparent example, has recently implemented a set of policies with this aim. In response to advocacy from "By and For" Community-Based Organizations in housing development, the WSHFC amended the points system for one of its LIHTC programs to incentivize partnership, ownership, and engagement with organizations that qualify as a CBO. This definition includes substantial lived experience from CBO leadership, but does not mandate nonprofit status.

The pivotal role of CBOs as housing and service providers is well documented an integral part of the affordable housing, public health, and social policy sectors as effectively administering state and federal programs, establishing innovating housing alternatives, and creating pathways to engage directly with community members, there is little literature that specifically considers the role of "By and For" organizations within LIHTC programs and policy development.

METHODS & ANALYSIS

As disability housing advocates identify opportunities for expanded inclusivity in Washington State's tax credit program policies, there is a gap in the literature on how these proposed policy revisions compare to those resulting from comparable measures in other states. Among a nuanced and intricate network of regulations, associated public programs, and incentives, there is also a lack of understanding of the influential factors that shape the physical built environment outcomes at the building level that empirically facilitate the expansion of accessible, affordable units for people with disabilities. To inform a more targeted analysis of accessibility reform in Washington State's tax credit programs, this thesis conducts a qualitative comparative case study using document review and semi-structured interviews to gain policy, development, and design insights from comparable affordable housing developments that were developed in states with differing HFA structures and QFA priorities: Connection Angle Lake project in Washington State; and The Kelsey Ayer Station in California.

The case studies are evaluated on the basis of the regulatory and funding landscape, including tax credit program policies and other major sources that are part of the capital stack of each project. A review of state and local funding sources are compared with the national and state trends discussed in the literature review to explore any additional insights through comparison. These projects also explore the involvement of a disability-centered CBO disabilities in the project partnership; the partnership structure, the mission of the CBO, and aspects of the project where the CBO played a role. Secondary interviews with development staff were used to supplement textual sources to help understand priorities, tradeoffs, and opportunities for reform. Case study findings explore the influential role that each of the regulatory, funding, and partnership structures play in facilitating the resulting outcomes of each project. The resulting project elements, such as services, design elements and affordability will be considered as they relate to the regulatory landscape, funding provisions, and involvement of a CBO partner.

The projects that were selected are the Connection Angle Lake project in SeaTac, WA; and The Kelsey Ayer Station (referred to as Ayer Station) in San Jose, CA.

FIGURE 11: Connection Angle Lake Aerial Photograph (Runberg Architecture Group, 2026)

Washington State *Connection at Angle Lake* in SeaTac, WA was selected due to the strong partnership between the nonprofit developer, Mercy Housing Northwest, and a community-based disability service and advocacy organization, the Arc of King County (referred to as The Arc). The partnership terms included The Arc's role in design review for the building, the facilitation of design charrettes with potential residents and community members, and The Arc's ownership of the ground floor space as a facility for housing case management and supportive services for people with ID/DD. The study design, outlined in the methodology section below, will seek to glean perceptions from implementers of this project to inform potential policy implications of the engaged design process for future policymakers and planners.

FIGURE 12: The Kelsey Ayer Station Aerial Photograph (The Kelsey, 2024)

California State: *The Kelsey at Ayer Station* in San Jose, California (hereby Ayer Station) was selected as the first project developed by The Kelsey in partnership with a development partner Sares Regis Group of Northern California (SRGNC) and Devine and Gong, Inc (DGI). The Kelsey is a California-based "disability-forward" housing developer and policy advocacy organization founded in 2018. The project is a 115-unit mixed affordability development designed with Inclusive Design standards developed by The Kelsey as a result of community engagement with, and leadership by, people with disabilities in the development process.

Overlapping Elements for Comparison: both housing developments were developed through a partnership between a private developer and a CBO who promotes housing advocacy as one part of a two-pronged mission. A mission-driven partnership of both projects is attributed to the inclusion of accessible design elements that go beyond state and federal accessibility requirements in each state. The projects are financed mostly by bond/4% tax credits, among a network of competitive local, regional, and state, and federal funds, including transit-oriented development funding. Each project includes a minimum of 20-25% of units set aside for people with disabilities, provides services for residents, and formed a development partnership between a disability advocacy organization and a private developer that conducted community engagement to inform accessibility considerations for each respective site. The projects went through the same development conditions, comparable 5-6 year project timelines around the same timeframe, meaning that the projects were broadly navigating a comparable national market contexts in terms of development costs and tax credit value. As transit-oriented developments, both projects are located near major public transit stops and community services. Onsite services and referral resources are present in both projects.

The projects were also chosen because of the structure of the development teams; each project including a traditional development entity partnered with a Community-Based Organization (CBO) that is led by and serves people with disabilities that played a substantial role in the design, services, and community engagement processes included in the projects and the resulting building features. The organizations included in the case study projects are distinct in their organizational structures, missions, and roles played in the project ownership, development, and service provision. The organizations involved in each project also serve as policy advocates at the state and national levels, participating in coalitions and advocacy that relate to housing issues of affordability, accessibility, integration, and service provision for people with disabilities. To varying levels of specificity, each CBO has participated in policy advocacy that relates to the LIHTC program as it serves people with disabilities. Figure 8 visualizes the overlapping and distinct elements that will be considered as part of the multiple case study approach.

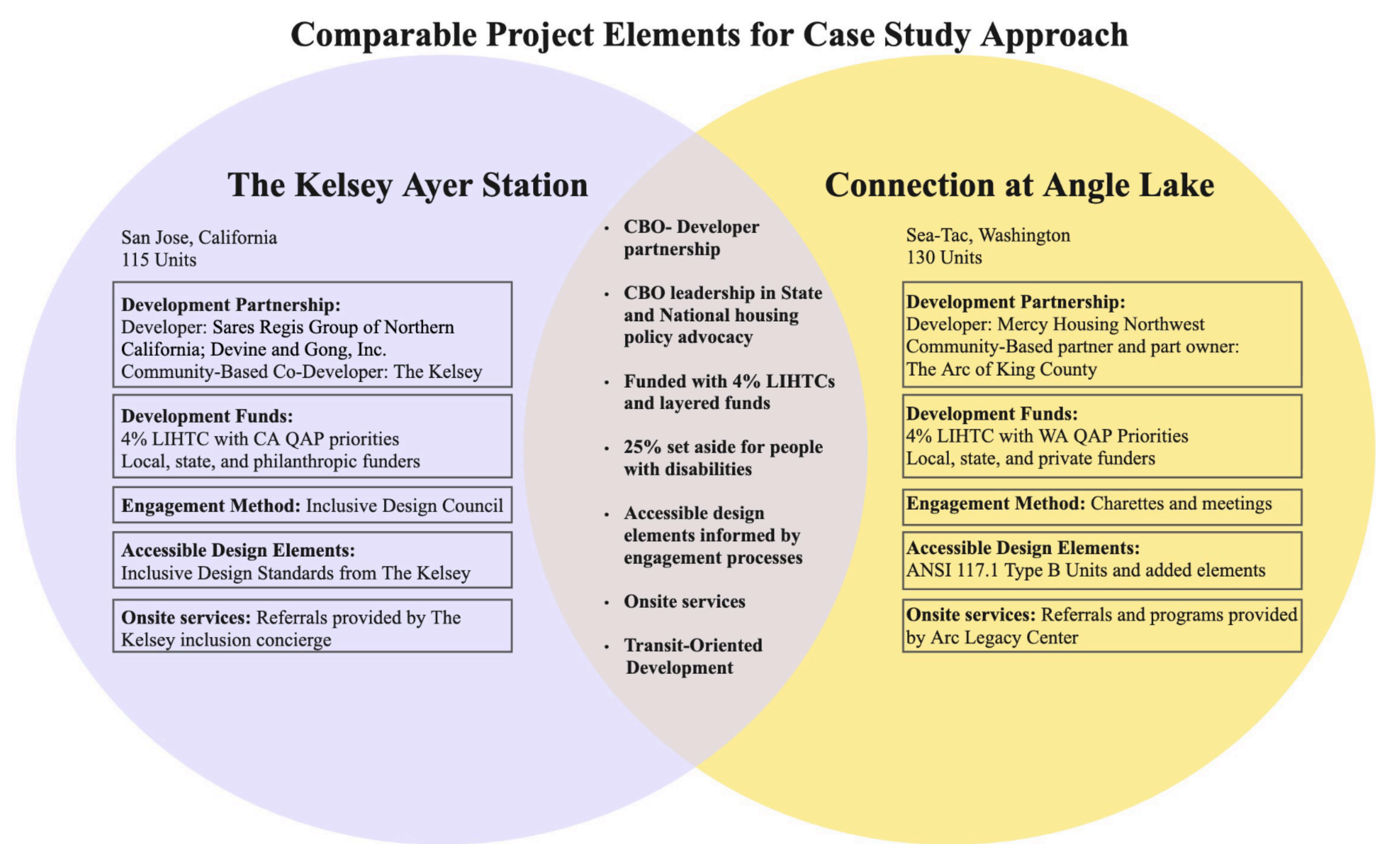


FIGURE 13: Comparable Project Elements for Case Study Approach

A pervasive challenge for scalable, effective social policy is that both the target population and the public programs intended to serve this population are varied and nuanced. The experiences, desires, and needs of people with disabilities are diverse, and the predominant framework of universal design in the built environment discourse increasingly fails to consider that diverse needs can vary, conflict, or contribute to discrimination against different abilities (Nielsen, 2024). Adding to this complexity is the increasing reliance of the public sector on alternative methods for providing affordable housing options under market scarcity and uncertain federal resources, which leads to competing priorities and additional nuances in assessing existing programs to determine truly effective, scalable outcomes for meeting community needs (Popkin, 2024). Case studies can be a valuable policymaking method to bridge academic discourse and normative approaches to policymaking with the realities experienced by policy implementers and intended beneficiaries (Mills & Wiebe, 2010).

As a critical program whose priorities are determined at the State level, a comparative case study approach is beneficial for examining the variation among actors and their priorities within the LIHTC program. According to 2025 comparative demographics from the Center for Budget and Policy Priorities, Washington and California demonstrate comparable rates of people with disabilities receiving federal housing assistance (30% and 33% in Washington and California, respectively) as well as similar trends in overall rental cost and income increases. The HFAs and other public entities in each state vary significantly in their structure and priorities, which creates a useful basis for state-level comparisons. The use of a multiple-case study approach between two development projects in two states will help to distinguish localized contextual factors from cross-sector, State-level themes, enabling a more in-depth analysis.

Comparative case study methods include the compilation and a qualitative deductive review of textual sources. Based on the complexities of public service and housing provision outlined in the literature review, and the influential role of CBOs as advocates and project partners, the deductive approach will be based on a content analysis that will explore insights as so how these factors influence the case study projects. Content analysis of sources will include the direct QAP and tax credit policy language that is available from both States, as well as any other financing report documents from the state HFA or other funding sources that are publicly available or used with permission. The Kelsey includes an open source case study of the financing and development timeline for the Ayer Station project, which will be cross–referenced to other sources, and other documents regarding its community engagement, policy advocacy, and inclusive design standards development processes. The Connection at Angle Lake project will also draw upon any publicly available information about the project, as well as a community engagement response form and accessibility matrix that were included in their application materials for the Bond/4% tax credit program.

Textual content analysis is the primary analytical source for this case study, and interviews will be a secondary source. In addition to textual review, this analysis validates content from text sources by gaining insights from semi-structured interviews with professionals from the development partner organizations to verify and clarify information. These interviews will also triangulate the data to generate a descriptive presentation of insights as they may be applicable to the Washington State policy context. The structure and documentation of these methods follows sector best practices and predominant design tactics used for the application of a case study methodology for policy analysis, which include the use of multiple data sources to triangulate insights, maintaining a chain of descriptive evidence from research questions to conclusions, and inviting key informants to review the case study report in order to clarify and confirm data, and employing a replication logic in the analysis to determine the conditions that factor into generalizability across the cases (Dinour et al., 2017).

Textual resources include available policy language, application materials, community engagement documentation, and any other relevant studies or documents pertaining to the development process of each project. (See Appendix B for a complete list of textual sources.) Additionally, interview subjects are selected using a purposive and snowball sampling approach to provide supplemental insight into the development context. Interviews focus on role typologies categorized as HFA staff, development staff, and policy development staff, and design standards staff members (See Appendix C for Role Typologies of Interviewees). The textual and visual resources resulting from semi-structured interviews with project implementers are analyzed through an inductive theory approach to generate new insights on the policy revisions and support future iterations of physically accessible design elements. In a complex web of regulatory and funding frameworks that govern housing provision, these methodologies focus on the unique development contexts of each site and enable a systematic comparison between projects across regulatory factors at the state, local, and site-levels, with a focus on assessing the extent to which the overlapping and distinct factors of each case study generate any generalizable insights to inform Washington State policy recommendations.

FINDINGS

STATE COMPARISONS

This section presents comparable elements between California and Washington across categories of design standards, public funding landscape, and tax credit policy priorities.

CALIFORNIA

Design Standards: California

California has more stringent and complex standards than Washington and many other States. California developed its own design standards prior to the passage of the ADA in 1990, with some added requirements. These standards include Section 11B which pertains to federally funded buildings. Some elements where California is stricter include tighter restroom turning clearances, signage specifications, and mandatory braille lettering, door closing force, lower mounting heights for mirrors, and parking lot access specifications. Disability-related complaints comprised the majority of fair housing complaints from 2015-2019, related to disability discrimination (19%), physical accessibility (17%) and Section 504 accommodation (24%).

	California	**Washington**
Building Code	2024 IBC 2022 CBC	2021 IBC ANSI 117.1
Mobility design feature set-aside	15%	Not specified
Hearing and vision design feature set-aside	10%	2%

FIGURE 14: Building Code and Design Feature Set-Asides by State

Public Funding Landscape: California

California's state-level funding landscape for developing and subsidizing affordable housing is complex, managed between the offices of the Treasurer and the Governor in the form of six state agencies. While many programs across these agencies are tailored to different affordable housing investments, only two programs provide permanent, ongoing sources of funding to supplement the tax credit programs: The Affordable Housing and Sustainable Communities program and SB 2 Building Homes and Jobs Act funding. The Affordable Housing and Sustainable Communities program invested nearly $750 million into affordable multifamily rental housing. SB 2 Building Homes and Jobs Act funds were voter approved in 2017 and are generated through real estate transaction and recording fees, and 15% of these funds are earmarked for low and middle income multifamily housing development.

Other funding sources that are tailored to people with disabilities include the California Section 811 Rental Assistance Demonstration Project, California Community Transitions Money Follows the Person (MFP) program, Medi-Cal long-term home and HCBS waivers. Waivers for supportive residential services are administered through a regional system. The Section 811 program funds included $8 million to fund 56 units in 2024. The California Community Transitions program and the Medi-Cal managed care program are mutually exclusive programs that enable the provision of funds for transition from assisted living facilities, transitional services, and other community-based services. The programs have each experienced funding cuts and changes to program requirements that limit access for people with disabilities, and a lack of affordable housing options continues to be attributed to accessibility limitations for individuals with disabilities who are eligible to use these services.

Tax Credit Policies in California

The LIHTC program in California is administered by the California Tax Credit Allocation Committee (CTAC). California's QAP applies to both the 4% and 9% tax credit programs. California is among the states, followed by Illinois, that go beyond the minimum Section 504 requirements, requiring setting aside 10% of units as sensory units and 15% as mobility units. QAP states a goal of targeting 40% of their allocations to special needs populations. To promote this prioritization, the program includes a 10 point set-aside for "Special Needs" populations, which is defined as individuals with disabilities alongside other populations such as people exiting institutional settings, at risk of or experiencing homelessness, fleeing domestic violence, experiencing substance use disorders, homeless youths, and older adults in need of supportive services. The QAP also includes a definition and point incentives for supportive services that relate to any project that includes a Special Needs set-aside. Five points each are specifically awarded, on the basis of a full time equivalency that is proportional to the unit count, for service coordinators, specialists, and case managers, respectively. See figure 15 for thresholds, set-asides, and point incentives, and Appendix E for side-by-side comparison with Washington State.

California Bond/4% Tax Credit Program Policies	
Points required to achieve threshold	50 points
Threshold Population Set-Aside	None
Population Set-Aside Point Incentives	10 points: "Special Needs" Population set-aside
Related point incentives	• 3 points: Site located near a facility that operates to serve the population in the development • 5 points: FTE service coordinator • 5 points: FTE service specialist • 5 points: FTE case manager

FIGURE 15: California State Bond/4% LIHTC Program Set-Aside by State

WASHINGTON

Design Standards: Washington

Washington adopted the 2021 International Building Code and the American National Standards Institute ANSI 117.1 design standards, which are both in alignment with the ADA 2010 Design Standards and Section 504. The IBC is an independent accredited organization whose standards categorize design standards for units as Accessible or as Type A, B, and C units, ranging from relatively more accessibility considerations to fewer.

Washington and California both adopted comparable design standards in the International Building Code (IBC) and the American National Standards Institute (ANSI) that comply with the ADA 2010 Standards (See Appendix D for relevant design standards as they relate to each state and case study). The Uniform Federal Accessibility Standards (UFAS) are included in policy documents for both states as an alternative that meets the requirements of Section 504.

Feature	Accessible	Type A	Type B	Type C
Minimum Door Width	32"	32"	31.75"	31.75"
Bathroom Grab Bars	Installed	Ready for install	Ready for install	Ready for install
Kitchen Counters	All accessible	Adaptable	Standard height	Standard height
Overall Flexibility	Fully accessible	Highly adaptable	Somewhat adaptable	Visitable

FIGURE 16: Overview of Differences Between Dwelling Unit Types (Vessel Architecture, 2024)

Public Funding Landscape: Washington

In addition to contributions from private equity investments and financial institutions, LIHTC funding is layered with other funds that are administered at the state level. In Washington State, the Washington State Housing Finance Commission and the Department of Commerce are the largest entities that manage affordable housing programs. The Housing Trust Fund (HTF) managed by the State Department of Commerce Multifamily Housing Unit, is the major source of publicly provided state-level funding in Washington State, investing nearly $240 million in 2025 and $181 million in the 2026 in various types of multifamily housing development, preservation, and continuing affordability. HTF funds were included in half of projects that received tax credit allocations in 2025. These funds include federal resources from the HOME block grant and National Housing Trust Fund programs. $29 million in 2025 and $19 million in state funds was earmarked for housing for people with intellectual and developmental disabilities.

2026 Funding Cycle:

Program	Amount	Source	NOFA Release Date *minimum of 90 days after Leg Session	Applications Due Date	Award Announcement Date
HOME & NHTF	$6,120,000*	Federal	June 22, 2026	Sept 10, 2026	Jan, 2027
HTF (Traditional)	$74,820,000**	State	June 22, 2026	Sept 10, 2026	Jan, 2027
AHAH Capital	$38,800,000**	State	June 22, 2026	Sept 10, 2026	Jan, 2027
IDD	$19,400,000**	State	June 22, 2026	Sept 10, 2026	Jan, 2027
Tribal Housing Set-aside* **	$21,500,000*	State	TBD	TBD	TBD
HTF Housing Preservation Program (HPP)	$19,400,000**	State	December, 2026	February, 2026	March, 2027
HTF Pre-development	$1,164,000**	State	Mid Oct, 2026	January, 2027	March, 2027
TOTAL	**$181,204,000**				

FIGURE 17: Washington State Housing Trust Fund 2026 Funding Cycle (2025-27 Biennial Investment Strategy, 2025)

QAP and Tax Credit Policies: Washington

Washington's program policies are divided between the Bond/4% and 9% tax credit programs which promote different thresholds and priorities. The 4% program requires a 10% unit set-aside for people with disabilities as a threshold requirement, and offers no additional point incentives for further set-asides. Relevant to the needs of this population, the program awards a spectrum of 1-8 points for the ownership, inclusion, and engagement contract of a Community-Based Organization as a partner. Points are awarded for projects that can demonstrate how engagement with potential or existing tenants was implemented to prioritize project elements and service partnerships.

Policy Element	Washington
Points required to achieve threshold	36 points
Threshold Population Set-Aside	10% set-aside for either large families and 10% people with disabilities OR; 20% disability set-aside
Population Set-Aside Point Incentives	None
Related point incentives	● 8 points: CBO is sole or part owner ● 8 points: CBO is included in a project as a service provider ● 2 Points: CBO is contracted to conduct potential tenant engagement ● 2 points: Engagement results are implemented into project ● 1 point: Engagement results in a service provider partnership

FIGURE 18: Washington State Bond/4% LIHTC Program Policies

Washington's 9% LIHTC QAP does not establish a threshold requirement for unit set-asides for people with disabilities, but awards 10 points for projects that include a 20% set aside for people with disabilities, alongside other populations such as older adults, people experiencing homelessness, farmworkers, and large families. Notably, the program also awards a spectrum of up to 3 additional points based on the proportion of units that have secured funding for Project-Based Rental Assistance, which includes Section 811 vouchers.

Washington State 9% Tax Credit Program Policies	
Points required to achieve threshold	164 points: King County 158 points: Metro County 154 points: Non-metro County
Threshold Population Set-Aside	None
Population Set-Aside Point Incentives	10 points: 20% set aside for disabled tenants
Related point incentives	Project-Based Rental Assistance (PBRA) ● 2 points: 10-15% of units ● 3 points: 26-49% of units ● 4 points: 50% or more units

FIGURE 19: Washington State 9% LIHTC Program Policies

CASE STUDY: AYER STATION

Site and Building Context: San Jose, California

The Ayer Station affordable housing project is a 6-story building located near downtown San Jose, CA. The project includes a mix of studio and 2 bedroom units that offer rents between 20-80% AMI. Of the 115 units in the project, 26 are set aside for individuals who use HCBS. The project received over 7,000 applications, over 1,000 for the subsidized disability set-aside units, and currently manages an extensive waitlist for these units through an open lottery system. The project is located on a site a few blocks north of downtown San Jose, which was originally zoned for commercial use and rezoned for mixed-use residential use after The Kelsey entered into a ground lease agreement with the City of San Jose to acquire the site.

Project Specifications	**Ayer Station (CA)**
Address	447 North 1st Street, San Jose, CA 95112
Total Units	115
Unit mix	Studio, 2 Bed
AMI Range	20-80% AMI
Disability Set-Aside	28 units
Place-based Vouchers	22 units (Section 811)
Place-based Supportive Services	6 units (San Andreas Regional Center clients)
Amenities	Lobby Fitness Room Maker Space Rooftop Terrace Sensory Garden Pet Relief Area Bike Parking Transit Passes Pet-Friendly Units

FIGURE 20: Ayer Station Case Study Project Specifications

Transit-Oriented Development Context

The project is centrally located in downtown San Jose near a variety of multimodal transit options, blocks away from the Diridon Station, which is served by the Valley Transit Authority (VTA) lite rail station, Amtrak, Caltrain, and Altamont Corridor Express train as well as major bus lines. The site was deemed eligible for a $10 million grant from the Affordable Housing Project as part of VTA Transit-Oriented Development program, which requires buildings situated near transit to include affordable housing. Under these requirements, one fifth of affordable units must be affordable to residents earning up to 60% AMI, and half of all affordable units should be affordable to households earning below 50% AMI.

Development Partnership: The Kelsey, DGI, and SRGNC

DGI and SRGNC: The project was developed as a joint venture partnership between The Kelsey and Sares Regis Group of Northern California (SRGNC) and Devine and Gong (DGI). The development partners are the for-profit co-developer entities that coordinated the financing and underwriting for the project. Sares Regis Group of Northern California is one of the top five largest for-profit real estate developers in California, and has developed over 19,000 residential housing units. Devine and Gong (DGI) is an affordable housing finance consulting firm led by women of color. In addition to leveraging their established networks and technical expertise, the partnership enabled the project to score competitively in California's tax credit application process. The California QAP gives additional point incentives for developers who have a track record of successful LIHTC projects, and who promote racial and gender diversity in the development team.

The Kelsey: Founded in 2018 as a nonprofit entity, The Kelsey takes a dual-mission approach of both advocating for disability-forward housing solutions and building their own housing to demonstrate the feasibility and replicability of their approach. The national nonprofit was co-founded by Micaela Connery and her cousin Kelsey Flynn O'Connor, a community advocate and individual with multiple disabilities, for whom the organization is named. In April of 2018, The Kelsey conducted a "Together We Can Do More" community organizing initiative to convene over 300 cross-sectoral groups from the San Francisco Bay Area for 3 workshop sessions that sought to scope housing challenges, align resources, and generate inclusive solutions for people with disabilities. One intervention that resulted from this initiative was to pilot an affordable housing project that centered on inclusivity and mixed affordability. As a result of the workshop, The Kelsey acquired an infill site in downtown San Jose that was rezoned from commercial to residential and designated as a Transit-Oriented Development project.

Development Funding

Several policy changes and cross-sectoral actors contributed to the project capital stack and gap funding, many of which are relatively new tools for affordable housing development. The project secured $7 million in funding from Google's predevelopment program, $10 million from California State TOD funding. The project initially received $34 million in tax exempt bond financing, but needed to request an additional $2 million of bond financing to accommodate cost increases during the construction phase of the project while meeting the requirements of the 50% percent test in order to access tax credit financing. It is unclear whether this additional bond request added extra time or cost to the development phase of the project. Additionally, $2 million from two philanthropic sources were sourced as predevelopment and gap financing. According to the project case study, early philanthropic support enabled The Kelsey to purchase the land that attracted other predevelopment and construction funds that made the project viable for tax credit applications. The Kelsey's project was the first project to receive Google predevelopment funds, and was able to utilize SB 35, a 2018 policy provision that streamlined the permitting process. Development staff at The Kelsey described the critical importance of accessing HCBS funds to secure the level of subsidy that was needed for the units set aside for people with disabilities.

Funding Sources	Ayer Station (CA)
Pre-development funding	$7 million (Google Housing Fund and Weinberg Foundation)
Tax-exempt bonds	None
4% Tax Credit Equity	$34 million
Transit-Oriented Development funding	$10 million (VTA)
Permanent debt	$16 million (Cal HFA Permanent loan guaranteed by HUD)
City funding	$3 million (San Jose loan) $14 million (San Jose land acquisition)
Other funding	$4.6 million

FIGURE 21: Ayer Station Case Study Funding Sources

Disability Set-Asides

The project includes 22 units set aside for people with disabilities, which are paired with Section 811 vouchers. A portion of the set-aside units are filled through referrals, while a portion are filled through the lottery system. 6 additional units are set aside for people who have IDD who are also established clients of the San Andreas Regional Center. The San Andreas Regional Center uses Medicaid HCBS waivers to provide community-based services to residents among other supportive services. Regional centers for IDD service provision are funded and coordinated in California through the Lanterman Developmental Disabilities Act of 1977, which is California law that expands regional center services for people with IDD, predating the Olmstead mandate, to require the provision of services to appropriately meet the needs and choices of people with IDD (Lanterman Developmental Disabilities Act, 1977; Zuraw, Hite, and Morantz, 2019)

Accessibility Using Inclusive Design Standards

The Ayer Station project was developed by The Kelsey as the first “prototype” of the organization’s Inclusive Design Standards (IDS), a design framework that was developed iteratively to complement existing codes with more expanded and specific design standards using a cross-disability approach. (See Appendix D for a visualization of how applicable codes relate to each state and case study context). The standards emerged alongside the development of the Ayer Station project, as The Kelsey sought to create a comprehensive and implementable resource for multifamily development.

In interviews, The Kelsey design and development staff drew a distinction between a universal design approach, often used in defining and promoting inclusive design, and a cross-disability approach. Staffers stated that, "There is no universal design... we try not to use that term, because we believe that access is individual, and so there is no ideal way to build a unit that will accommodate everyone's access needs." A cross-disability approach establishes design standards across a design typology of different impact areas, such as mobility and height, hearing and acoustics, vision impact areas, health and wellness, cognitive access, and support needs (The Kelsey, 2026). Where a universal design approach is often considered a “one size fits all” approach to built environments and programs, whose impacts are intended to extend beyond a target group, a cross-disability approach builds upon these principles to take a targeted approach. Cross-disability design can more comprehensively consider how different types of accessibility can vary across different access needs (The Kelsey, 2026). As federal housing standards originally focused on physical and mobility access, subsequent standards from regulatory agencies and community-based organizations have evolved to consider more specific guidelines for other types of disabilities. The IDS was developed through compiling these specific standards, researching international standards, and soliciting feedback from community members with lived experience. A comprehensive set of design specifications is nested within a larger series of design categories that outline choices throughout the project development process, including the design process, site selection, building components, interior spaces, dwelling units, and operations and amenities.

The IDS intended to create legible and actionable resources that can build on previous iterations, including over 800 design elements across different impact areas. The IDS were developed by a cross-sectoral inclusive design council composed of architects and development professionals, later growing into a group of over 300 development professionals and leaders in accessible design and inclusive development advocacy. Pivotal to this work was Erik Mikiten from Mikiten architecture, a LEED-certified universal design professional and hard-of-hearing wheelchair user. Mikiten also sits on the board of the California Building Standards Commission that creates the State Building Code. Informed by Micaten's technical expertise and lived experience, the Inclusive Design Standards were developed alongside a certification system modeled after the Leadership in Energy and Environmental Design Certification program. A self-certification tool is made available on The Kelsey's website to developers to assess their accessibility standards, ranging from silver to platinum standards. The Ayer Station project achieved a gold standard certification, demonstrating that there were even further considerations that could be potentially incorporated to projects.

Efficiency and Cost Savings of Early Accessibility Considerations

According to the Inclusive Design Standards lead at The Kelsey, many of the enhanced accessibility elements do not differ significantly in cost or complexity from what typically gets built, but these small considerations can make a big difference in resident experiences. Development cost totals from the Ayer Station project demonstrated that the overall construction cost of the project was lower than the area average for the Bay Area. Team members at the Kelsey described that the two biggest concerns that they hear from the development community is that accessibility features are costly, visually unappealing, and burdensome. Staff from The Kelsey shared: "The biggest pushback is ‘This is going to cost us more money. We don't have the funds to do all of these little extra things. We're already meeting code. Why do we have to do something extra?’" In response to this, a strong point in The Kelsey’s design advocacy is to demonstrate the visual appeal of inclusive design and to exemplify the cost and administrative savings that can be gained from anticipating accommodation needs.

An example that was repeatedly shared by interviewees at The Kelsey was the maintenance cost savings of including reinforcements to walls that often require grab bars. This consideration is relatively low cost in terms of upfront construction materials and labor while eliminating the need to rip out walls for future accommodation needs. Another no-cost, high-impact example was adding pegboard walls to allow residents to add modular shelving and hooks based on their needs and preferences, or placing consideration into planning a kitchen layout that enabled people using mobility assistive devices to navigate around and open fridges. Small considerations like lowered mirrors and lights, and including dimmers, emerged from community engagement as low-hanging fruit that helped community members feel like their experience was thoughtfully considered. Anticipating accommodations can also reduce liability and administrative costs for fair housing violations. The Kelsey staff is currently working on a cost analysis of the Ayer Station development to further demonstrate the potential cost savings benefits of anticipatory, inclusive design.

In alignment with the principles of universal design, many cross-disability considerations also benefit other groups. One example brought up by staff at The Kelsey were wayfinding elements like hieroglyphic symbols and color coded floors that are not only beneficial to people with cognitive disabilities, but can also support children, people with dementia, people with varying levels of literacy, or people whose first language is not included in the project signage. Inclusive community-based approaches to disability housing alongside cross-disability design also align with policy and design goals of senior housing and aging-in-place. Buildings that are designed for people with disabilities across the lifespan include many elements that are relevant to the needs of older adults who age into different disabilities and access needs and who also rely on overlapping housing subsidy programs, enabling a multigenerational, inclusive, affordable housing model where these communities can co-exist and mutually benefit.

One team member from The Kelsey described how developers and policymakers have described their hesitation regarding the costs and curb appeal of accessible design. These people changed their minds upon visiting the Ayer Station project. Once people see what it really looks like to have an inclusive community, according to the staff member, it will “click” with them: “you could just see the click happen. Like, oh, this is what it means to be in an inclusive environment. This is lovely and it clearly didn't cost an arm and a leg extra to do so." The Ayer Station project provide a tangible example of successful, appealing inclusive design to individuals who may have negative associations.

Engagement methods and services

In addition to the insights from the Together We Can Do More initiative, The Kelsey staff spent over a year dedicated to recruiting community support for the project through one-on-one meetings and community advisory groups. Priorities that emerged from engagement included outdoor amenities, flexible spaces that promote socialization and connection, and universally designed spaces. The Ayer Station project has pioneered a service coordinator role titled the Inclusion Concierge whose role is to connect residents with services and promote programming. The title was chosen with an intention to promote inclusive language. Residents in 26 units receiving HCBS waivers will receive additional case management services that may be coordinated onsite with the Inclusion Concierge.

Disability set-asides

Project staff at The Kelsey described differing priorities and constraints as they related to the maximum proportion of disability set-asides required by different public funding sources, and how this related to their advocacy approach to integration. The State of California promotes a 35% disability set aside, which was higher than some interviewees considered appropriate to ensure that individuals with disabilities can live equitably among other populations, according to one staff member at The Kelsey. In alignment with federal mandates, the Section 811 program requires a 25% set-aside, which one Kelsey development team member described as a low proportion, instead preferring 35-40%. When asked to clarify the organization's position about set-asides, one staff member shared: "The Kelsey's stance as an organization is that 25% is pretty much the ideal, as this amount encourages integration and helps prevent the accidental creation of segregated communities." A present tension between choice and access policy approaches to disability centered housing policymaking is the siloed impact of integration set asides, which promote independent living by infusing housing intended for people with disabilities into other physical developments. While situated in the same physical location, this policy approach does not embody the intent of integration in an inclusive way. Implementing meaningful inclusion requires an evolution of housing provision models to promote more intentional mixes of different types of abilities, access needs, and service needs alongside other nondisabled community members. (The Kelsey, 2023).

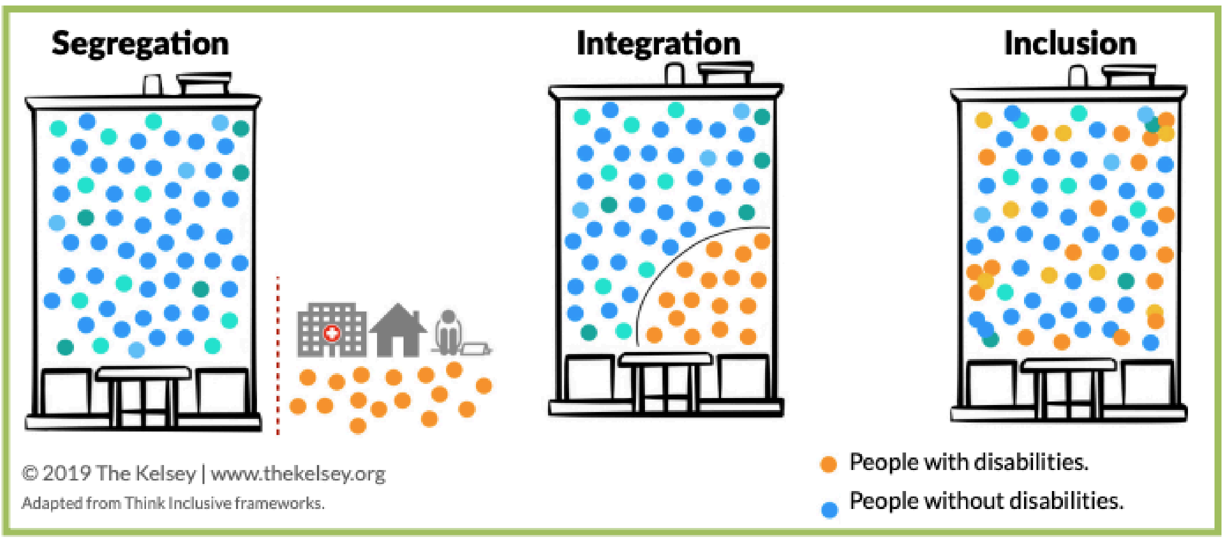


FIGURE 21: Segregation, Integration, and Inclusion Housing Impacts in Disability Housing (The Kelsey, 2023)

Lessons learned

In 2025, The Kelsey conducted a Post-Occupancy Evaluation which included a survey, focus groups, meetings with Inclusion Concierge staff, and an interview with staff from The Kelsey. The results demonstrated positive feedback from residents about the unit design considerations, unit finishes, wayfinding, pet friendly considerations, staff support, and communal spaces (The Kelsey, 2026). Specific issues that were identified included unreachably high cabinets. A design-related safety concern that arose was the depth of stairs was not deep enough to allow for a wheelchair user to descend backwards in an emergency (The Kelsey, 2026). One design mistake that became apparent was the placement of the sensory garden next to a designated pet relief area. The biggest design issue that arose from tenant feedback was the inaccessibly small design and lack of ventilation of the laundry facilities (The Kelsey, 2026).

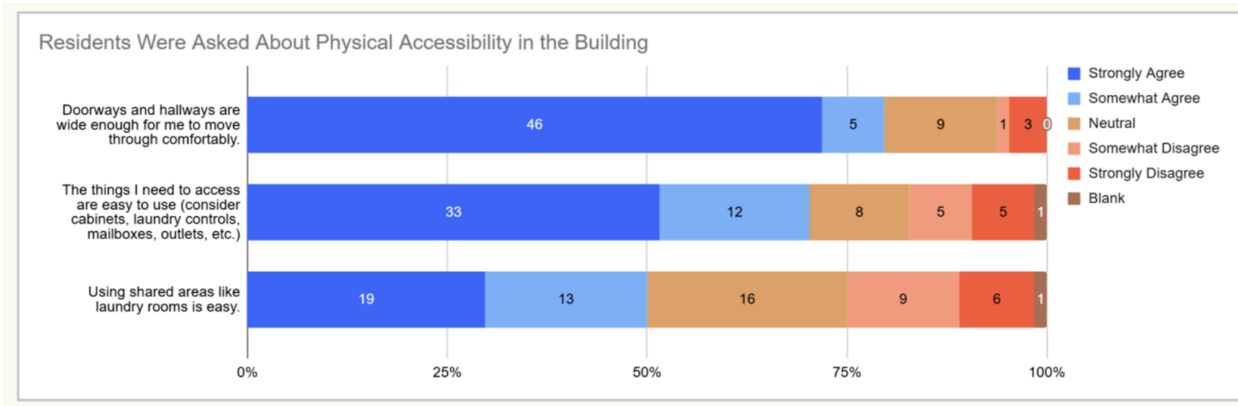


FIGURE 22: Ayer Station Survey Responses Regarding Physical Accessibility (The Kelsey, 2026)

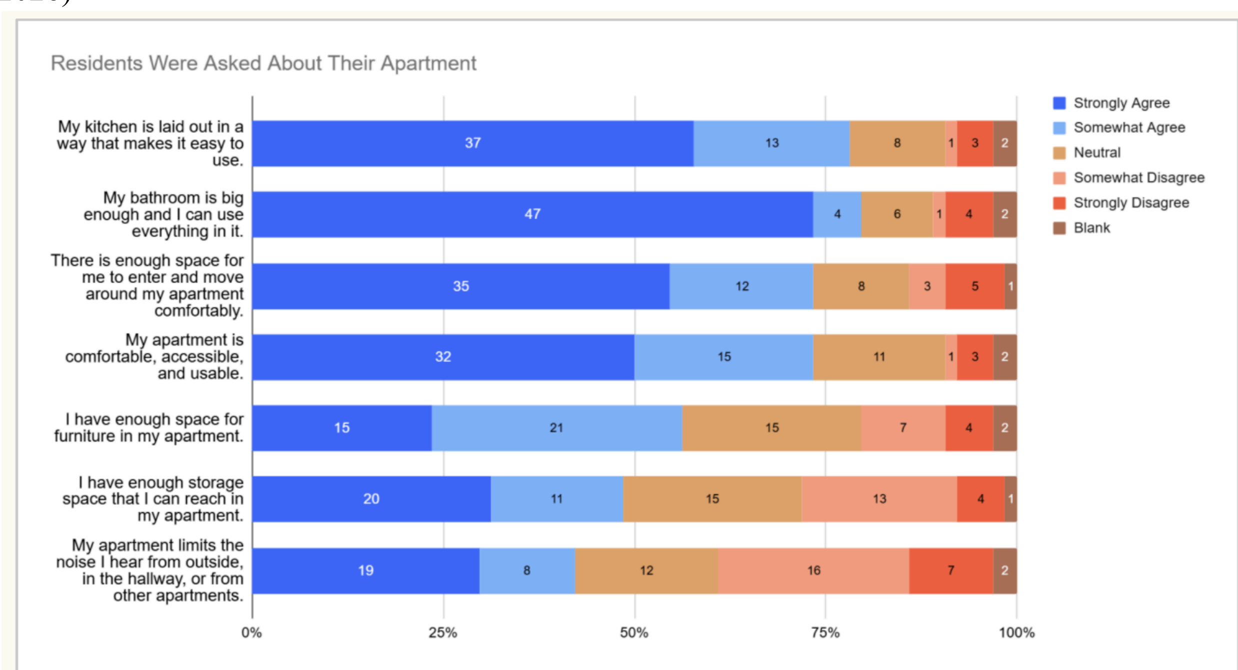


FIGURE 23: Ayer Station Survey Responses Regarding Apartment Accessibility (The Kelsey, 2026)

Housing Policy Advocacy Promoted by The Kelsey

Leaders from The Kelsey convene with other CBOs across multiple coalitions to influence policy on a national scale. Staff from the Kelsey sit on national committees such as the Consortium for Constituents with Disabilities to progress advocacy on HUD LIHTC disability data collection, and collaborate with major research institutions such as the Urban Institute to report on national demographic trends for people with disabilities. They have pushed for national congressional LIHTC reforms through advocacy with national tax credit industry firms such as Novogradac. In 2024, The Kelsey supported the introduction of Senate Bill 3925 Boosting Tax Credits for Affordable Housing Act, which would incentivize disability-centered housing by boosting the tax credit eligibility if they meet specific standards. The standards include projects located adjacent to walkable and wheelable areas, and whose design also meet Uniform Federal Accessibility Standards (UFAS), which are the minimum standards established for federally funded buildings.

While leading the charge for minimum standards at the federal level, The Kelsey is also an influential advocate for deeper incentives and standards at the state and local levels. Advocates are encouraged to participate in public comment periods to urge their HFAs to require more accessible units, promote affordability under the limitations of the LIHTC program, and to incentivize additional affordable housing models tailored to the needs and interests of renters with disablities. As a relatively small organization, staff from the Kelsey described that they were not well positioned to urge for HFA action across the country, so their strategy involves playing a “backbone” role to support advocates in each state to take on the work. Across the three methods of prioritization in QAPs, including points, thresholds, and set-asides, The Kelsey has developed specific recommendations for HFAs. Major advocacy topics included in the Kelsey QAP advocacy guide for state HFAs and housing advocates include:

ANSI Type A accessibility standards as a baseline requirement: The Kelsey is an advocate for HFAs to codify the adoption of American National Standards Institute (ANSI) Type A design standards into state QAPs. ANSI design standards are interpreted by the State of California and HUD as in compliance with FHA Section 504, but Type A requirements are an additional consideration (United States Department of Justice Civil Rights Division, 2013). Specific design features of ANSI Type that go beyond Section 504 and the UFAS include turn radiuses, lower shelving, lever handles for door hardware, lower kitchen work stations, lower bathroom facilities, and accessible threshold throughout units. Advocates urge for State HFAs to include these design standards as a threshold requirement in LIHTC QAPs.

Incentivize units that build beyond minimum accessibility requirements

Alternative to, or in addition to, a threshold requirement for accessibility standards, The Kelsey advocates for projects to include a point incentive structure for including additional accessibility features. In a competitive tax credit allocation process, points for additional building features or improvements create opportunities for developers to incorporate elements that further HFA-identified priorities such as promoting sustainable energy systems, serving higher numbers of target populations such as seniors or people experiencing homelessness, or including Community-Based Organizations in project development.

Developers often describe the need to navigate challenging or potentially costly tradeoffs when determining point priorities while also meeting other affordability and compliance requirements that govern the LIHTC program. The prevailing argument against accessibility requirements in the real estate development sector is that the added cost of incorporating accessibility features makes projects financially infeasible. In response to this resistance, The Kelsey asserts that there are overall cost-savings associated with enabling residents to age-in place, avoiding ADA noncompliance complaints and violations, and reducing the costs of some types of accommodations later on in the project lifespan. For example, new construction projects can build in reinforcements in areas where grab bars are commonly installed, overall saving costs associated with labor, construction, and administrative burden needed to meet required and necessary accommodations. There is a lack of market-based research unique to the affordable housing sector demonstrating the current administrative and material costs of fair housing accommodation or scalable cost savings associated with accessible design standards. The Kelsey is currently working with a consultant to determine cost data for the Ayer Station project, and meanwhile emphasizes a narrative change approach that centers on how the lived experience of tenants is impacted by design.

Visitable Inclusive Tax Credits for Accessible Living Act (VITAL): In 2023, The Kelsey endorsed the introduction of the VITAL Act to the US Senate, which is an expansion of tax credit funding for the LIHTC Program that includes incentives for housing developments that are inclusively designed and located in well connected neighborhood settings. The act proposes a threshold requirement of 40% of LIHTC units to be adaptable and accessible, and allocates $150,000 to the establishment of tax credit resource centers that promote new developers. The bill did not pass out of the senate during the legislative session, but received support from a broad coalition of disability-led organizations.

Affordable Housing Credit Improvement Act (AHCIA): In 2025, The Kelsey joined over 2,400 other organizations in a campaign to endorse the reintroduction of the AHCIA to the US Senate, which was first introduced in 2016 as a comprehensive set of revisions to the LIHTC program.

These revisions would restore previous cuts to the program and increase credit allocations. Among other revisions, the bill originally pushed to lower the 50% test to 25%, which has now been implemented through other legislation.

Create a rental subsidy fund for accessible units: In an existing affordable housing market where many "affordable" rental units burden very low income renters without subsidy assistance, The Kelsey urges HFAs to create and sustain a fund for disability-specific rental subsidies, citing Pennsylvania as an exemplar. In the real estate industry, a developer fee is what the development firm charges in exchange for managing the funding, permitting, and construction processes and for taking on the real estate risk for a housing project. A varying portion of the developer fee is paid when the project financing is completed, but some agreed upon portion is deferred to cover ongoing costs and then repaid to the developer over the lifespan of the project.

In Pennsylvania's QAP, developers are incentivized to set aside a portion of their developer fee to a subsidy fund in exchange for increasing their allowable developer fees. This funding set-aside is used to directly subsidize rents for tenants whose income falls below the target rent. Internal subsidies can be more reliable and scalable than other public subsidies or vouchers. There are currently no available reports from the Pennsylvania HFA about the process and outcomes of this subsidy strategy.

Plain language advocacy**:** In addition to specific priorities and incentives in QAP requirements, The Kelsey has urged for the requirement that all lease-up documents be put in plain language, or language that can be easily understood on the first read-through by people who are not familiar with the renting process. Not only is plain language helpful for people with different literacy levels or cognitive processing abilities, which can also promote accessibility for individuals who do not speak American English as a first language. The Kelsey promotes a plain language advocacy guide for HFAs, development teams, and property managers to address administrative burdens and accessibility barriers for renters of all abilities. One development partner, Mercy Housing, included in the case studies of this thesis partnered with The Kelsey to update the lease-up documents across its regional affordable housing divisions. There are currently no available reports about the process and outcomes of the plain language modifications to the lease-up documents.

Incentivizing and Operationalizing the Inclusive Design Standards: To scale the momentum of each project's success, The Kelsey promotes the IDS as an adaptive tool that private and public entities can use and benefit from. Alongside the design categories and elements that are compiled and simplified in plain language, the IDS also includes point incentives and a self-scoring certification system that can be partly or fully embraced by private and public actors. The point system includes a baseline requirement of essential elements, and then a tier from silver to platinum for projects across its design categories. Project factors that earn points include many elements that are reflected in the case studies: incentives that involve people with disabilities in the design process, plan for neighborhood mobility such as transit-oriented development, include additional services, and contain specific building elements can all score points.

Essential
60 Total Elements

Silver
95 Total Elements

Gold
145 Total Elements

Platinum
236 Total Elements

Category	Essential	Silver Certified	Gold Certified	Platinum Certified	Max Available
1. Design Process	6	8	11	16	22
2. Site	12	23	35	58	86
3. Building Components	12	18	28	47	67
4. Interior Spaces	11	16	25	40	62
5. Dwelling Units	9	17	29	50	77
6. Operations and Amenities	10	13	17	25	34
TOTAL	**60**	**95**	**145**	**236**	**343**

FIGURE 24: Inclusive Design Standard Certification Tiers and Point Categories (The Kelsey, 2026).

Development partners can become committed firms who embed a variety of IDS elements into their professional practice, or The Kelsey also provides technical expertise to projects and municipalities to codify IDS standards and incentives into their programs. After the construction of Ayer Station, the City of San Jose included incentives to include focus groups with people with disabilities into the City's housing programs, and doubled its requirements for mobility and sensory units. Other public entities have consulted with The Kelsey to implement their own standards, such as multifamily design standards in San Antonio, Texas and workforce housing standards in Teton County, Wyoming. The Housing Finance Agency for Washington D.C. included the IDS standards in its tax credit policy point incentives, providing maximum points in its housing-related points category for achieving a certification based on the IDS self-certification tool.

The advocacy topics presented by The Kelsey reflect their organizational positionality as a disability-centered nonprofit with two pronged roles as both developer and policy advocate. Their advocacy focuses on revisions to baseline accessibility standards and technical changes to tax credit policies across local, state, and national scales, as well as the introduction of a tool for implementing systematic design standards. In addition to their role in incorporating disability-centered project priorities into the Ayer Station project, this presents an example of the potential role that CBOs can play in leveraging their proximity to lived experience to promote policy solutions that reflect the needs of the communities they serve.

CASE STUDY: CONNECTION ANGLE LAKE

Site and Building Context

Connection at Angle Lake opened in 2023 adjacent to the Angle Lake light rail station in SeaTac, Washington. The 130 units include a total of 211 bedrooms that are a mix of 30%, 40% and 50% AMI, and 26 units are set aside for people with intellectual and developmental disabilities and families with children. SeaTac has an older and relatively less accessible housing stock, according to the Comprehensive Plan Housing Inventory and Assessment Report, which states that about 87% of the housing stock was built before 1990 and the passage of the ADA Accessibility Guidelines.

Project Specifications	Connection Angle Lake (WA)
Address	2660 S 200th St, SeaTac, WA 98198
Total Units	130
Unit mix	Studio, 1 Bed, 2 Bed, 3 Bed
AMI Range	50-60% AMI
Disability Set-Aside	26 units
Place-based Vouchers	Mainstream vouchers
Place-based Supportive Services	None
Amenities	Laundry Centers Outdoor Playground Green Space Bike Storage Limited Garage Parking On-Site Resident Programming On-Site Management Controlled-Access Building Close to Parks

FIGURE 25: Connection Angle Lake Case Study Project Specifications

Reduced Parking Requirements

One noted element that supported the feasibility of the project was the reduction in required parking spots. The City of Seatac reduced the parking requirements from a ratio of .9 parking spots for every available unit to .6, which made the project more feasible to develop. Project documents described that easing the parking requirements enabled a 32% increase in the number of affordable units that were added to the project.

Transit-Oriented Development Context

According to application documents, the total development cost for the project was $71 million, about $6 million of which was for the non-residential costs of the development. The land was purchased at a discount as part of a regional TOD incentive to promote affordable housing near Sound Transit lite rail stations. Using voter-approved tax revenue funds, Sound Transit discounted the property value, originally valued over $2.4 million, by over $300,000 as part of an Equitable Transit-Oriented Development policy approach to promote dense, affordable housing developments near the expanded light rail stations. The site was partially selected due to the opportunity for transit-oriented development funding and density bonuses.

Development Funds

Other funding sources include $17 million from the Amazon Housing Equity Fund and $2 million in predevelopment funding from the Amazon Housing Equity Fund, which funded the project as part of a funding partnership with Sound Transit, contributing $25,000 in predevelopment funding and $75,000 for construction. The project received about $42 million in tax-exempt bond financing alongside the 4% tax credit allocation, the specific amount was not specified in project documents. Of state and local funds, the project received $3.2 million from the State Housing Trust Fund and $950,000 from King County. The project also secured HUD Mainstream project-based vouchers for a portion of the IDD units.

Funding Sources	**Connection Angle Lake (WA)**
Pre-development funding	$25 million (SoundTransit TOD)
Housing Trust Fund	$3.2 million
King County	$950 thousand
Tax-exempt bonds	$38.2 million
4% Tax Credit Equity	$24 million
Transit-Oriented Development funding	$75 million (SoundTransit)
Permanent debt	$16.5 million
City funding	None
Other funding	$2 million grant (Amazon Housing Fund) $17 million low interest loan (Amazon Housing Fund)

FIGURE 26: Connection Angle Lake Case Study Funding Sources

Partnership Context

Mercy Housing Northwest (MHNW) is a nonprofit affordable real estate developer that develops and manages 50 properties in Washington State. MHNW prioritizes a service-driven approach to affordable housing provision and incorporates healing-centered design elements into its projects. A 2019 analysis of resident participation in services across the organization's national housing portfolio found that residents participating across a spectrum of services such as financial stability, health, housing stability, and after school childcare had longer residencies and lower risk of eviction or abandonment outcomes. Staff from Mercy said that their organization has a reputation for taking on complex developments and that Mercy Housing was selected for partnership because the organization “loves a hard project,” over other nonprofit and for-profit developers in the local area.

The Arc of King County is a national organization with state and local chapters that works to promote and protect the human rights of people with intellectual and developmental disabilities, including housing advocacy and support services. Nationally, the organization works among a coalition of disability-centered organizations on a broad spectrum of policy topics related to people with IDD. The Washington State Chapter leads state-level legislative advocacy in addition to supporting local chapters, which provide services, supports, and advocacy. In addition to advocacy, the Arc of Washington manages the Developmental Disabilities Endowment Trust Fund (DDETF) which supports savings accounts for recipients of SSI, SNAP, and housing benefits to grow financial stability without jeopardizing their program eligibility. The local chapter can be characterized as a community-based organization due to its geographic roots, established relationships with the community, and coordination with public agencies to promote service provision. The local to national network of agencies enables localized service provision while drawing from the localized realities of disability needs to promote informed policy advocacy. The organization provides disability competency training, skills workshops, and facilitates supported living services for people with IDD using state funds.

The relationship between the entities developed when Arc of King County had supported with providing referrals for individuals with intellectual and developmental disabilities to other Mercy projects, and a partnership slowly formed in anticipation of the procurement of the sound transit adjacent land. The relationship began with meetings that included MHNW and Arc board members and leadership, including individuals with disabilities and their family members to share organizational backgrounds and to identify any goals and concerns that related to a service partnership in a new housing project. The Arc's previous headquarters were purchased by another developer and slated for redevelopment, creating an opportunity for the organization to consider ownership and design of a new space. This organizational need aligned with Mercy housing's funding development goals, which aligned with the point incentives in the Bond/4% tax credit funding that awarded an additional 10 points in total to the project for including a CBO in the project ownership structure and engagement process.

The partnership secured a Memorandum of Understanding that outlined partnership teams. Mercy would lead the development, lease up and operations management, while the Arc would co-develop and own the commercial space, from which it would expand its programming and provide services for the residents of the 26 IDD set-aside units. The partnership also specified that the Arc would be included in the design team, conduct engagement for design elements, and play an influential role in determining what features to prioritize in the project.

As part of the partnership development and inclusive design process, Mercy staff held an internal staff retreat that focused on identifying the benefits that could be addressed from a top-down versus side by side partnership development model. Afterwards, an interdisciplinary team was assembled to tour the Arc offices, including development and contracting staff as well as an architect, Karen Braitmayer at Studio Pacifica, who lives with a disability and is a leader in promoting accessibility in development work in the Pacific Northwest. Studio Pacifica prepared a MHNW Accessibility Best Practices Study as part of the contract with the project team. The team toured Othello Plaza, another Mercy-developed affordable housing project to assess the accessibility tradeoffs in the project and identify opportunities for serving people with disabilities. The Arc generated a document of accessibility priority elements that was delivered to Mercy to incorporate into designs and budget processes. The project budgeted $250,000 to incorporate the additional design element. The list and priority elements were used to generate an accessibility matrix over the course of three iterative meetings throughout the 18-month predevelopment phase of the project, which determined a breakdown between units with Type A accessibility features.

Part of the benefit agreement to the Arc was the condo ownership of the ground floor commercial space that was co-developed by the project partners. The Arc assumed a permanent loan to acquire the commercial space. Mercy Housing delivered the financing and the guarantees for assuming debt for the construction of the project and supported the Arc in applying for additional capital grant applications from state and local sources. As part of the partnership agreement, both partners agreed to engage in a capital campaign to acquire more financial support in an effort to reduce the permanent debt assumed by the Arc for the headquarters.

Engagement Method and Design Elements

The Arc-owned commercial space was designated the new organizational headquarters and titled the Arc Legacy Center, which will house programming, services, and administrative staff. In addition to a service contract and condo ownership of the commercial space, the Arc was compensated $15,000 for conducting engagement to determine project elements. The design team leveraged the community relationships fostered by the Arc to conduct a design charrette with people with disabilities and their families. The project utilized the accessibility matrix generated from the community engagement to include additional ANSI Type A units, included in Figure 28. Of the 130 units, 7 were required under ADA to include the additional accessibility features. The other 19 units set-aside for residents with IDD, across a range of bedroom sizes, were designated as Type B+ units that include a wider range of specifications.

Expanded Unit Accessibility Elements

The chart below illustrates the Type A and Type B+ elements as well as the standard Type B unit elements.

	TYPE A	TYPE B+	TYPE B
34" HIGH KITCHEN COUNTERS (WITH 6" DEEP SINK)	✓		
33" WIDE REMOVEABLE KITCHEN SINK CABINET	✓		
33" WIDE ACCESSIBLE KITCHEN WORK SURFACE	✓		
RANGE HOOD WITH ACCESSIBLE CONTROLS	✓		
ROLL-IN SHOWER (IN 75% OF EACH UNIT TYPE)	✓	✓	
BATHROOM DOOR SWINGS OUT	✓	✓	
REMOVABLE VANITY CASEWORK	✓	✓	
GRAB BAR BLOCKING PROVIDED	✓	✓	✓
GRAB BARS INSTALLED	✓	✓	
AUTO UNIT ENTRY DOOR WIRING	✓	✓	
LOWER WINDOWSILLS (18")	✓	✓	✓
CRANK WINDOW HARDWARE	✓	✓	✓
LONG WANDS ON WINDOW BLINDS	✓	✓	✓
SIDE-BY-SIDE REFRIGERATORS	✓		
DIMMER LIGHT SWITCHES IN LIVING AND BEDROOMS	✓*	✓*	

- Subject to code and acceptable product availability

FIGURE 27: Walsh Construction Accessible Elements for Connection at Angle Lake

Interviewees described how Type B unit accessibility was an important baseline for the set-aside units due to their adaptability. Some of the Type A accessibility elements impact the unit layout or add costs, and not all housing needs require the breadth and depth of accessibility elements included in these unit types. Since it can be difficult to match residents with specific accessibility needs to a unit, Type B units can be a cost-effective design option because they can be adapted to include some Type A unit considerations, as shown in Figure 27, without much additional cost relative to converting a standard unit.

Accessible Unit Types

The twenty-six units set aside for persons with IDD will be allocated as follows:

	Studio	One	Two	Three	Total
Type A Units	2	2	1	2	7
Type B+ Units	5	5	4	5	19
Total	7	7	5	7	26

FIGURE 28: Walsh Construction Accessible set-aside unit types for Connection at Angle Lake

Other important elements that resulted from the reserved accessible parking spaces for Arc visitors, and flexible features for a common area space. Notable features included adaptable workspaces, door sensors, and lowered switches. The restrooms in the main floor also include a Hoyer lift, adult changing table, and an additional wheelchair accessible stall. The added construction costs for the accessibility elements in the project amounted to about $300,000, about $50,000 more than originally budgeted during the engagement and design processes. Across 26 units, this reflects an average cost of $11,500 per unit.

Services

The partner organizations collaborated to develop an integrated services model that includes elements and values from each organization's service approach: Mercy Housing Northwest's resident services approach, and The Arc of King County's supportive services delivery model, to develop a model tailored to IDD specific housing. Mercy Housing provides onsite property management to all residents with specific housing services tailored to the IDD residents in partnership with the Arc.

Lessons Learned

Project development team members described an iterative process to expand physical accessibility in new projects. Mercy Housing staff described how lessons learned from previous projects continued to shape considerations for future projects in the project pipeline, stating that "Honestly, a lot of this stuff is just good design." Beyond design standards, the organization has committed to considering other ways to address the needs of residents with disabilities, including new opportunities to integrate an IDD centered service model into service provision as well as considering other types of disability services. Mercy Housing worked with The Kelsey to adapt all of its leasing documents into plain language, or language that is easy to understand on the first read-through.

Housing Policy Advocacy Supported by The Arc of King County

In Washington State, the Arc of King County is a member of the Washington Low Income Housing Alliance (WLIHA), a statewide housing coalition that spearheads policy development through education and legislative advocacy. Relevant topics included in the WLIHA Roadmap to Housing Justice are the importance of updating regulation to promote "common and plentiful" accessibility features in new housing developments, as well as the importance of coupling investments in affordable housing with operational and service funding to promote sustainability. The Arc of King County along with other chapters across the state is a member of the Community Advocacy Coalition for Developmental Disabilities (CAC) that engages with state entities on legislative and budget priorities. The Arc publishes a position statement across a variety of topic areas including housing. At the State level, the Arc has focused its housing development advocacy efforts on the Department of Commerce Housing Trust Fund, and its major advocacy topics are to promote inclusive and accessible housing through set-aside funding for people with IDD and to establish a long term fund for housing development for this population. The Arc does not appear to be involved in any advocacy efforts regarding the LIHTC program. Relevant advocacy topics regarding affordable housing and services from the state and national chapters of The Arc include:

Expand critical Medicaid programs: the Arc's state advocacy has promoted for the expansion of Medicaid program. These expansions include, and are not limited to, the Long Term Supports and Services funds, Home and Community-Based Services funds, and the re-establishment of the Katie Beckett waiver, a medicaid waiver that enables children with medical needs to access streamlined, community-based care as an alternative to institutionalized settings.

Coordination of housing with community-based housing services: The Arc is advocating for a stable funding source in Washington State that isn't subject to uncertain cuts or shortages. Engagement and policy documents describe that the Arc calls for a link between housing and service provision to promote the ability of individuals to get necessary services and live in appropriate housing settings.

Adopt Universal design and visitability standards in all new housing developments: In their position statement in support of people with IDD, the Arc advocates that all new and significantly rehabilitated multifamily housing include a proportion of fully accessible units that reflects the existing proportion of people with disabilities.

Establish Progressive Revenue Sources: The Arc of King County published a resolution in 2021 calling for a revision of Washington State's tax code to promote more progressive revenue sources. In the resolution, the Arc leadership claims that the State's regressive tax structure disproportionately harms people with IDD and people of color who are more likely to be reliant on chronically underfunded public support systems.

Center Disability Voices in Housing Design: The Arc of Washington holds an annual disability symposium that brings together leaders from a variety of public sectors to discuss topics relating to DD. During the 2025 Washington State DD Symposium, where leaders in an Advocacy Caucus called for more active involvement of people with disabilities in policymaking and design processes, citing that "nothing about us without us" should be a guiding policy approach. A key distinction is made between consultation and genuine partnership in this approach to establish sustainable and meaningful relationships between the IDD community and public actors.

The advocacy topics presented by the Arc reflect their organizational positionality as a disability-centered nonprofit with two pronged roles as both developer and policy advocate across state and national scales that focuses on the IDD community. Their advocacy focuses on coordinating and expanding funding for services associated with people with intellectual disabilities and involving people with disabilities in decision making. In addition to their role in incorporating disability-centered project priorities into the Connection Angle Lake project, this presents an example of the potential role that CBOs can play in leveraging their proximity to lived experience to promote policy solutions that reflect the needs of the communities they serve.

DISCUSSION

CASE STUDY INSIGHTS

The case studies were shaped to varying degrees by an interrelating landscape of regulatory and financial factors and by the shared vision of the development partnerships. Regulatory frameworks included different considerations and incentives, regional transit-oriented development programs, and state adopted building codes. Financially, the capital stacks varied in their use of state, local, and philanthropic support. The success of each project to achieving funding, services, and inclusive design as desired was facilitated by the partnership structure of each project. The structure of each partnership was critical to its success, but the variations in projects differed in how they reflected the goals of each partner organization, and how these partnerships were incentivized through tax credit points. In distinct ways, the projects were motivated by tax credit policies that incentivized the nature of the partnerships, services, and engagement approach in each case study.

FACTORS PROMOTING FUNDING AND DEVELOPMENT

The case studies demonstrate a handful of parallels and distinctions that exist in the regulatory and funding landscapes of each state. Parallels between the projects include the importance of private sector and transit-oriented development funding. The mechanism of funding was slightly distinct for transit-oriented development funds, between discounted land that was proportional to land value costs in Washington, and direct grant funding that was capped at a specific amount in California. Each regional incentive to promote affordable housing near planned transit projects limited competition for other uses such as commercial ventures, enabling both projects to feasibly select a centrally located site that could guarantee the transit accessibility for their target population. Both projects also relied on private sector predevelopment funding from the housing development funding divisions of major corporate entities with a strong economic presence in each area. Alongside a scarcity of other local funds, this parallel may suggest that there is a lack of publicly provided predevelopment sources, and that a critical resource gap is being filled by private actors.

The case studies also highlighted several ways that California's regulatory landscape diverges from the federal mandates that shape Washington's regulatory landscape. Some of California's regulations predate federal policies. The regional center system facilitated by the Lanterman Act of 1977 established a funding and service stream that ultimately enabled the Ayer Station project to set-aside additional units with guaranteed funding for supportive services. It is not apparent that the Washington State service provision system is readily able to leverage available Medicaid waivers and pair them with units, which may be due to supply shortages.

Notably, the Ayer Station project faced a potential delay by requiring an additional bond to meet the requirements of the 50% test, which likely required additional time and cost to line up the appropriate resources to qualify for funding. This element of the tax credit and bond funding landscape is an important consideration that adds complexity to projects and is also changing in real time at the time this thesis is published in 2026. As the Big Beautiful Bill is implemented, the new 25% bond financing requirement is taking effect.

Additionally, the California Building Code predates the ADA and Section 504 regulations and the State QAP specifies expanded design standards for sensory and mobility set-asides in LIHTC developments. California's heightened requirements promote the systematic inclusion of additional accessibility features in all LIHTC developments. Meanwhile, all the accessibility features in the Washington project were not mandated but instead driven by the shared vision of an intentional, mission-driven partnership that was unique to the project. Accessible, inclusive design is not otherwise required or incentivized beyond compliance with federal requirements in Washington State.

The most variation between the projects is apparent in the state local funding landscape of each case study. The projects used varying degrees of funds from state entities, demonstrating the importance of state level capital funding to support projects. The Ayer Station project received a mix of loans and bonds from state entities, while the Connection Angle Lake project received direct funds from the Housing Trust Fund. At the local level, the Ayer Station project received early funding support from the City of San Jose and attributes the success of the project to a strong relationship with the City. The City of San Jose has an established housing funding program that supplied both grant funds and a substantial loan for land acquisition, suggesting that the City has a relatively robust set of funding programs to support multiple aspects of the housing financing process. Connection Angle Lake relied on state funds from the Housing Trust Fund and local funds from King County. Outside of Seattle and King County, there are relatively few funding sources for projects at the city and county level. SeaTac, Washington did not have the same resources to support the project, but instead supported the project's success by reducing parking requirements. This demonstrates the intervening role that flexible local land use policies play among a constrained development environment.

Role of Development Partnerships and Incentives

The highly professionalized and complex nature of the tax credit industry creates barriers to entry for new affordable housing developers, particularly mission-driven community-based organizations whose expertise stems not from real estate development but from promoting the needs of communities the housing projects are intended to serve. Both projects involved a partnership with experienced developers who were established in applying for, receiving, and complying with the highly complex tax credit allocation process. It is exceedingly difficult, or impossible, in the case of California's point threshold, for a developer with no previous projects to successfully receive a tax credit allocation. Partnerships between experienced housing developers and newer housing developers, both nonprofit and for-profit, are a necessary stepping stone for enabling newer development organizations to establish a track record and industry expertise to successfully receive tax credit allocations. Partnerships can also promote the involvement of an organization whose mission is not centered around solely developing or owning their own housing, but focusing on mission-driven and resident-centered outcomes within the housing projects.

The role of cross-sector partnerships is critical to overcoming barriers to accessibility to critical funding for housing development, and incentives within program policies are necessary to facilitate and promote these partnerships. In the Connection at Angle Lake project, additional points in the tax credit policies for project ownership allowed the project to score competitively, which created an appealing opportunity for Mercy Housing Northwest to negotiate a condo ownership structure that would expand the Arc's organizational capacity and allow both organizations to promote their service-centered missions. While there is no specific point incentive for accessible design elements, the additional points for CBO partner-led engagement enabled the partnership to benefit from promoting ownership stake and involving the Arc more comprehensively in the design process. In the Ayer Station project, The Kelsey achieved success through partnering with racially diverse and established developers under the tax credit incentives, and by prioritizing the onsite presence of Inclusion Concierge staff members. The organization was not successful in its first tax credit application without a development partner, which further illustrates how the partnership was critical to the project's ability to score competitively in the tax credit allocation process.

Role of CBO Partnerships and Incentives

Partnership with established development entities was critical for these projects to access the needed resources and expertise to receive competitive tax credit funding. The community-based organizations provided equally critical operational and strategic insights into how the projects can effectively meet the needs of the communities they intend to serve. Partnerships with community-based organizations who are led by and serving the geographic or identity-based communities that are served by the housing project are well positioned as a trusted, permanent entity that can garner local support for affordable housing projects, resolve conflicts, and facilitate sustainable, appropriate onsite services and programming. Community-based organizations, led by people who are part of the communities that they serve, are able to make decisions that are most relevant and effective to their communities.

The case studies present two projects that leveraged the expertise and relationships of community-based organizations to inform the spatial and service elements of these projects. The partnership between private development entities and mission-driven, community-led entities enabled each entity to leverage their skillsets to successfully create developments that were responsive to the populations they intended to serve. The partnerships varied in their goals, roles, and ownership structure, and the structures of these partnerships were facilitated in part by tax credit policy incentives.

In the Connection project, the Arc was involved in a lease-to-own arrangement to assume eventual ownership over the commercial space as their permanent organization headquarters, establishing a permanent presence onsite in a service and referral provider role. The Arc did not take on direct development or funding responsibilities, but played an influential role in the design process in partnership with the development and design team. Both projects also consulted with architects who had lived experience. Conversely, The Kelsey played an owner and co-developer role in the partnership and leveraged the expertise of their experienced developer partners to gain industry expertise and participate in the public funding and design processes.

Both project partnerships identified accessibility as a desired spatial and programmatic priority area of the project. The Connection at Angle Lake project prioritized the relatively more comprehensive type A units for population set aside from the existing building code in addition to common area considerations that resulted from engagement, while the Ayer Station project prioritized a set of elements that went beyond the federal and state building codes in California. The variety of design elements that were included reflect how the organizations leveraged their expertise and partner role, as a design consultant and emerging developer, respectively, in each partnership to identify feasible project elements under the design and budget constraints of tax credit funded multifamily housing.The Connection at Angle Lake houses the Arc's service and programming hub, which includes programs that involve non-residents who may or may not have disabilities, while The Kelsey is engaged onsite through a resident-focused Inclusion Concierge that serves to connect with other public and community-based providers. The different structures of these partnerships enabled the unique ways that the CBOs participate in these projects to further their distinct missions in service of the same housing and service outcomes for people with disabilities.

FACTORS MOTIVATING ACCESSIBLE DESIGN

Several themes emerged across the case studies regarding the important elements to consider in disability-centered design. A disability-centered design approach in affordable housing development promotes six elements: inclusive design, diverse, adaptable, iterative, intersectional, and practical solutions.

Inclusive design: Both partnerships were motivated by a core value that inclusive projects start with an inclusive process. This process centers lived experience and leadership of the people who are members of the community and intended to live in the building. Both projects drew upon lived experience to inform project design, in different ways. Connection at Angle Lake used the highest standards that currently exist in major design guidelines, as directed by the leaders with lived experience at The Arc. The Ayer Station project prototyped a different series of design standards that were directly compiled from an in-depth process led by professionals with lived experience. It was through the structure and function of each Community-Based Organization as a mission-driven partner that these leaders leveraged their experiences and community connections, relationships, and missions to drive accessibility outcomes of each project.

Diverse: Many similar elements emerged from the engagement and design processes of each project, such as mobility considerations and sensory elements, but they varied in the scope of their implementation across individual units, common space amenities, and site elements. Some differences in elements can be attributed to distinct site and budget constraints and partnership approaches to the design process. Other differences reflect not only a diversity of needs and use cases for each building, but also a diversity of design approaches that consider a variety of abilities. The Connection at Angle Lake project was tailored towards an IDD design and service model, while the Ayer Station project attempted to incorporate a cross-disability design approach. Despite their different emphases on a disability design approach, both projects included a spectrum of accessibility elements across a variety of abilities. Some of the differences, such as light switch heights or door handle selection, are accessibility choices that not only comply with federal and state regulations, but also reflect two distinct outcomes from two distinct engagement processes with leaders and community members within a diverse community. These distinctions reflect the attitudes of disability advocates that there is not a singular design standard that can comprehensively consider many different types of physical, visual, sensory, cognitive, and auditory needs. The design outcomes that resulted from these projects demonstrate how a diversity of needs is not solely met through a universal design approach, but may instead be further addressed through an inclusive, community-engaged approach.

Adaptable: The case study projects considered how individual units, common spaces, and site elements should be strategically planned to consider how needs can vary widely between individuals, but also how built elements of these projects may anticipate that these needs will change over time. Movable and flexible elements were included in common spaces in both projects to promote different uses from everyday socialization and recreation to special programming and events. In the units, both projects emphasized adaptability as a baseline standard for their residents with disabilities. In the Connection at Angle Lake building set-aside units, the ANSI Type B+ standards not only expanded accessibility for residents but enabled cost effective and simplified modifications for new residents, or for residents whose needs may change over time. As housing projects are intended to have long lifespans, involving at least a minimum 15 year period of affordability under tax credit requirements, centering adaptability during the planning and design phases of the project enables more flexibility and expands opportunities for people with disabilities to modify their living spaces as needed and use common spaces as desired.

Iterative: Both project teams described design priorities in their projects, and their organizational approach to accessibility and inclusivity, as an evolving practice that continued to build upon lessons learned from previous projects and community input. The case studies produced several important takeaways for each project partner to carry forward into future projects. Mercy Housing, across its Northwestern and other national branches, continues to enhance its accessibility considerations in design and administrative processes and refine its understanding of how to navigate tradeoffs between inclusive design and cost-effective development. The Kelsey intends to pursue more tax credit projects in partnership with other developers, and has identified several physical elements in its buildings that it has carried forward into future developments. Project team members described how there was still room for including more and more elements, exemplified by the gold standard certification in its own Inclusive Design Standards certification process. While each project identified specific takeaways, both described their overall approach to promoting accessibility not as a fixed achievement in a project, but as an ongoing process of learning and improving in partnership with community members.

Intersectional: Just as the housing disparities faced by people with disabilities intersect with the disparities observed among other marginalized communities, an inclusive approach can recognize and center these intersections to promote more equitable housing outcomes. Considering intersectionality among these communities creates opportunities for promoting integration of people with disabilities, both as a social policy approach and as a means of understanding how different communities are uniquely impacted by experiences of multiple marginalization between disability status and other identities. In alignment with a universal design approach, there are also ripple effects to accessibility and inclusion approaches that impact other communities whose needs and identities intersect with disability. The sites of both case studies were selected and funded in part as transit-oriented developments near major bus, train, and light rail stations. Access and transit-oriented multifamily development interrelates with other disparities in socioeconomic equity to opportunity and transit. The promotion of inclusive design and disability-centered developments in two transit-centered areas is

Practical: Project implementers across both case studies described how accessibility considerations are a common sense consideration that will simplify operations and improve resident outcomes in the future. These considerations can reduce the cost and administrative burdens on disabled renters to seek out accessible units and request accommodations and modifications, and can also potentially ease the anticipated burdens on operating and maintenance staff to implement modifications and accommodations. Anticipating renters with a variety of abilities enables housing providers to anticipate the increasing accessibility needs of an overall aging population of renters and be prepared to carry out modifications.

INDUSTRY PERSPECTIVES ON INCLUSIVE DESIGN

There is a scarcity of literature that reflects the impressions and attitudes regarding accessibility within the development industry, but multiple interviewees across the development, funding, and design typologies for each case study described a prevailing attitude in the development sector that accessibility considerations can impact project feasibility and add burdens to development. The two largest concerns identified in the case studies were the perception that accessibility standards are costly to implement and aesthetically unattractive. Ramps and lifts were the most specific repeated examples brought up in interviews as costly and aesthetically unappealing, but no other accessibility features were specifically identified. It is unclear, both in terms of available cost data and perceived outcomes, whether there are other particular types of accessibility considerations that are perceived as appealing or more cost effective to implement than others.

While it is unclear whether these attitudes exist in other sectors of real estate development, interviewees described that a logical source of the pushback to accessibility enhancements among the developer community in multifamily, tax credit funded housing development is a burden concern. Developers navigate already complex and stringent requirements for subsidy layering, additional incentives, and tax credit compliance. For developers, the perceived burden of accessibility features can present as one more layer of complexity that must be accounted for in planning and construction costs. This attitude is underaddressed in existing literature and advocacy.

CBO-DRIVEN POLICY RECOMMENDATIONS

Policy advocacy for affordable, integrated, and accessible multifamily housing was among the multi-pronged missions of both Community-Based Organizations involved in each case study. The Arc's advocacy topics emphasize breadth across a broad spectrum of considerations while The Kelsey's advocacy topics emphasize depth regarding technical considerations that relate to the LIHTC program. This reflects the organizational contexts of each respective organization and their topic areas. As an organization that seeks to promote a disability-forward housing model, The Kelsey is well positioned to focus on a narrow topic area in detail, while the Arc's multi-scale structure focuses on summarizing a broader array of advocacy topics. Given its specific focus within the disability community on individuals with IDD, much of the Arc's advocacy also places a higher emphasis on the many programmatic aspects that are necessary to promote integration for people with IDD and their care systems.

Recommendations for Policymakers, Researchers, and Advocates

While this research considers the factors that influence housing provision for people with disabilities through a state and project-level qualitative comparative case study, there are several topics that emerged from the literature, case study insights, and CBO advocacy that should be considered by cross-sector actors interested in furthering disability housing outcomes. The literature review illustrates the current landscape, and the case studies affirm how projects that serve people with disabilities face a patchwork of services driven by an imbalance policy approach. Using the insights from this research, this section highlights areas for further research, advocacy, and policy focus.

Center a diversity of people with disabilities in policy and housing development processes

Throughout the development process, decision makers should include people with a variety of disabilities in a meaningful, compensated role. In housing development, policymakers should consider requiring or incentivizing the inclusion of people with disabilities on project and design teams. Considering the high barriers to literacy of the LIHTC program, policymakers should consider the establishment of ongoing work groups and committees made up of disabled advocates that are centered around lowering barriers to understanding the LIHTC program and identifying participatory design approaches to better understanding the accessibility of the housing stock and how to better develop inclusive housing options. This recommendation includes expanding the capacity of Community-Based Organizations to participate in the housing development sector as development partners, service providers, and advocates through additional targeted funding, training, and incentives. Using a cross-disability lens, interested parties should be represented on behalf of a multitude of disabilities across categories such as mobility, IDD, hearing, vision, and independent living disabilities. The best methods of engaging and sustaining relationships with renters with disabilities should be determined in partnership with CBOs who are rooted in housing development, disability services, and advocacy.

Participatory design to analyze the housing stock accessibility

The literature review highlighted a knowledge and data collection gap in the state of the nation's affordable housing stock in terms of physical accessibility. The current understanding of accessibility is through national scale data collection tools, like the American Housing Survey, tends to emphasize mobility-related housing elements, with little systematic understanding of how housing elements are currently experienced by people with visual and hearing impairments, sensory needs, intellectual and developmental disabilities, mental illness, and other types of disability. This recommendation emphasizes the need for expanding this understanding to evaluate how the housing stock currently meets these needs to better evaluate and implement impactful development standards. These needs are best assessed through the active involvement of people with a variety of disabilities through a participatory research design process. Evaluative tools for assessing the housing stock should be developed through the active involvement of residents, advocates, design professionals, and policymakers who have lived experience with multiple dimensions of disability. The best methods of evaluating the housing stock should be determined in partnership with CBOs who are rooted in housing development, disability services, and advocacy.

Participatory design to promote and evaluate design standard reform

Accessibility is a core barrier to housing outcomes for disabled tenants, driven by incomprehensive federal design standards. This comparative analysis revealed that there is a network of relatively interchangeable design standards, in compliance with federal mandates, that fail to meet the spatial and geographic needs of a variety of abilities, an understanding which is limited by a lack of cross-disability evaluation. While federal policies play a pivotal role in determining the baseline spatial and geographic form of these developments. The expanded features in these projects were driven by commitment of partners, external incentives, and inclusive design processes. Policymakers, developers, and researchers should consider a more stringent set of design standards that consider a broader range of abilities, including the promotion of ANSI Type A standards as a baseline requirement. The Kelsey's engagement-informed design process has the most expansive, and scalable design guideline potential to date. Policymakers should consider incentivizing or requiring these standards using the self-certification tool developed by The Kelsey. The development of new design standards should be based on a participatory design process in partnership with disabled cross-sector actors. The case studies informed that best practices for disability-centered housing are driven by an inclusive design process, diversity, adaptability, iteration, intersectionality, and practicality. The impacts of these design approach dimensions should be further analyzed and incentivized among cross-sector development teams.

The literature review and case studies also suggest a lack of understanding among the policy and development sectors about the costs and benefits of designing for inclusion and accessibility. Cross sector actors including researchers, policymakers, and advocates should consider developing a cost-benefit analysis evaluation tool for learning about accessibility standards across a variety of design typologies ranging from in-unit and building elements, to better understand how they may impact project feasibility and resident experiences. Advocates should urge for additional development data collection to drive policy reform, and for stronger partnerships between development professionals and disability-led CBOs to identify ways that inclusive design elements and processes can be more widely adopted.

Promote LIHTC policy for partnerships, set-asides, services, and standards

The literature review and case studies emphasize the critical role that tax credit funds play in building new multifamily affordable housing, and the influential role of HFA priorities in serving disabled tenants. The findings from this research echo what CBO advocates have been calling for: the LIHTC program presents an impactful opportunity for reform through promoting priorities at the state level that benefit priority populations and target tenants with disabilities. As demonstrated by the case studies, HFAs should consider point incentives that promote partnerships between traditional developers, emerging developers from underrepresented communities, and CBOs. These incentives serve to address barriers to housing development among marginalized communities by promoting opportunities to gain development expertise. Development partners benefit from leveraging CBOs whose perspectives reflect the lived experience necessary to create sustainable housing outcomes for residents.

To better meet the growing housing needs of people with disabilities and the other priority populations that intersect with the disability community, policymakers of HFAs should also consider developing a minimum disability-set-asides as threshold requirement for all projects. Insights from the literature review and case studies demonstrate that determining the most inclusive and appropriate set-asides for people with disabilities requires deeper analysis and ongoing engagement. Set-asides in affordable housing that are too low or too high may fail to meet the mandate of integration in community-based settings. Insights from disability housing advocates in these case studies did not result in an ideal set-aside range, although outcomes are often determined through the 25% set-aside determined by the Section 811 program or the ability to coordinate other service funds with units intended for disabled tenants. Echoing staff from the Kelsey, 25% is a reasonable target set-aside, but there may be cases where higher set-asides could be appropriate depending on target population, location, and project size. Future research should examine current trends in set-aside housing requirements across HFAs in every state, and conversations about prioritizing disabled tenants in affordable housing should be driven through ongoing processes of cross-sectoral engagement that centers tenants with lived experiences of disability.

Cross-sector actors should also conduct additional research across other HFAs and engage with disability housing advocates to learn more about other incentives or requirements that can promote outcomes for people with disabilities. Policymakers and researchers should also consider awarding additional points for projects that include accessible design standards beyond the minimum requirements, center people with disabilities in the design process, or conduct a meaningful engagement process to develop onsite programs and amenities that reflect community desires. Other incentives demonstrated in the case studies are incentives to promote projects that are located near relevant services, or that include onsite service providers, or that have secured funding sources for additional subsidies or programs.

Establish and expand stable funding sources for disability services and housing

The literature review established that a patchwork of funding sources currently exists to subsidize the development and operating costs in the LIHTC program, particularly for low income tenants, and with additional funding needs to provide medical and social services for people with disabilities. This variable funding network makes housing for disabilities increasingly difficult in an already complex system. As people with disabilities are often earning lower incomes or relying on SSI as a sole source of income, there is a clear need for rental assistance and operating subsidy through public capital funding to support this population. This recommendation includes expanding existing project-based voucher programs and considering additional capital funds for population-specific rental assistance.

The case studies demonstrate that set-asides and services are driven by funding available for additional subsidies and services, which can vary by state and local resources. This analysis found that existing federal and state funders, in addition to transit-oriented development programs, played a pivotal role in securing funding to promote affordability mechanisms as they exist now. The variations in services and patchwork funds are a reflection of the scarcity of vouchers and rental assistance sources. This comparison affirms that sources of development funds, tax credits, vouchers, and service funds such as Medicaid are critical to successful projects. Policy reform efforts should promote the continuation and expansion of these programs in addition to promoting deeper operating subsidies and service funds. Researchers and policymakers should explore fund development through progressive revenue, fees, and innovation to develop stable funding sources that are earmarked for development of affordable housing. There is also a lack of systematic analysis at the national, state, and local level that explores the extent to which the availability of service funds interrelate with affordable housing development trends and housing outcomes for people with disabilities. Further analysis is needed to understand how the current trends in service coordination and affordable housing development are supporting the mandate of integration.

CONCLUSION

This research explores the cross-sectoral factors that influence housing outcomes for people with disabilities in Washington State. The unique, disproportionate housing outcomes faced by renters with disabilities are the result of an imbalanced, patchwork policy approach that is driven by choice, most prevalent in the Low Income Housing Tax Credit Program and the intricate web of programs that it interrelates with to develop affordable housing. As the LIHTC program presents a reform opportunity to improve housing outcomes for disabled renters, there is a lack of understanding of how this complex program interrelates with other factors, and how CBOs can be leveraged to promote inclusive housing development. To better understand the current landscape, and a path forward is driven by lived experience of disability, this research used a qualitative comparative case study between two disability-centered LIHTC projects.

The case studies findings generated valuable insights about the current funding and regulatory landscape as it currently confronts the challenges of affordability, accessibility, and integration for disabled renters. The Washington and California contexts revealed a shared reliance on tax credits, transit-oriented development funds, and private predevelopment funding, with differences in local and state level funding and building standards. These projects were shaped by available resources, building regulations, and a disability-focused partnership, and lend insight into influential factors across dimensions of funding, policy, and partnerships. Within the existing funding and policy landscape, involving CBOs as partners and trusted policy advocates demonstrate an equitable path forward. This research concludes with key topic areas for cross-sector actors to consider research, reform, and inclusive practices in housing development. As CBO advocates have emphasized, all future efforts that impact people with disabilities should be centered around the expertise of lived experience.

APPENDICES

APPENDIX A: Timeline of Relevant Policies and Programs

YEAR	Legislation, Program, or Ruling	Overview
1935	Social Security Act (SSA)	Retirement benefits for workers and their families, with provisions for people with specifically defined disabilities.
1937	Wagner-Steagall Act (Housing Act of 1937)	Established public housing to promote post-war economic recovery. Later amended in 1974 to establish the Housing Choice Voucher program.
1950	Amendments to SSA of 1950	Federal funding distributed through State governments for people with disabilities established under Title XIV of the 1935 SSA.
1956	Social Security Disability Insurance (SSDI) Program	Social security benefits ensured for people who pay into social security but become unable to work due to disability, ensured under Title II of the 1935 SSA.
1959	Section 202: Supportive Housing for the Elderly	Project-based funding for nonprofit organizations to provide housing for senior populations. Non-elderly people with disabilities were eligible for some properties prior to the program conversion to Section 811 in 1992.
1968	Fair Housing Act	
1968	Architectural Barriers Act (ABA)	Requires access to federally-funded facilities. Considered the first federal disability policy.
1971	*Wyatt v. Stickney*	Ruling pertaining to the rights and care standards for individuals in mental health facilities, contributed to the de-institutionalization movement.
1972	Supplemental Security Income (SSI)	Provision of funds for people unable to work due to age or defined disability, established under Title XVI of the 1935 SSA.
1973	Rehabilitation Act	Section 504 prohibits discrimination on the basis of a disability in federally funded programs.
1974	Housing and Community Development Act	Creation of the Section 8 Housing Choice Voucher program.
1980	Civil Rights of Institutionalized Persons Act (CRIPA)	Investigate conditions of state and local institutions.
1986	Tax Reform Act	Established the Low Income Housing Tax Credit Program
1988	Fair Housing Amendments Act	Includes disability as a protected class under Fair Housing Act and establishes minimum adaptability and access standards for multifamily

		housing.
1990	Americans with Disabilities Act (ADA)	Five titles pertaining to employment, public provision of services, public accommodations, telecommunications, and miscellaneous provisions that are required across local, state and federal governments. Title III pertains to physical accessibility standards in federally funded spaces.
1991	Fair Housing Act (FHA)	Amendment to expand 1968 FHA to prohibit discrimination on the basis of disability
1992	Section 811 Supportive Housing for People with Disabilities	Project-based funding for housing for people with disabilities. Adapted from the 1959 Section 202
1995	HCBS Medicaid Waivers	Waivers are included to allow reimbursement through Medicaid funds outside of institutional settings.
1998	Quality Housing and Work Responsibility Act (QHWRA)	Consolidation of Section 8 certificate and voucher programs.
1999	*Olmstead v. L.C.*	Prohibited inappropriate segregation of adults with disabilities and determined guidelines for promoting community-based services. These guidelines are used for the provision of Medicaid Home and Community-Based Services.
2000	Developmental Disabilities Assistance and Bill of Rights Act	Provides federal funds to community-based services that promote integration for persons with developmental disabilities.
2010	Frank Melville Supportive Housing Investment Act	Reforms to Section 811 program to promote integrated, community-based supportive housing services. The program initially started with 13 states, including California and Washington.
2010	Affordable Care Act (ACA)	Expanded Medicaid eligibility for people with disabilities and "Community First Choice" enabling long term supportive services in home settings.
2014	Achieving a Better Life Experience Act (ABLE Act)	Promotes saving private funds to support individuals with developmental disabilities to supplement federal benefits.

Table Sources: Connery (2016), Pelka (2023), and the Department of Housing and Urban Development (2025).

APPENDIX B: Textual Sources for Case Study Materials

Name	Source	Data Type	Source Typology	Jurisdiction or Case Study
The Kelsey Ayer Station Case Study	The Kelsey	Textual	Project Context	California- The Kelsey
SLC Final Staff Report for: Kelsey Ayer Station	The Kelsey	Textual	Project Context	California- The Kelsey
The Kelsey Inclusive Design Standards	The Kelsey	Textual	Design Standards	California- The Kelsey
Inclusive Design Council	The Kelsey	Textual	Design Standards	California- The Kelsey
Inclusive Design Standards- A Tool to Advance Housing for Municipalities	The Kelsey	Textual	Design Standards	California- The Kelsey
California Building Code Chapter 11B Accessibility to Public Buildings, Public Accommodations, Commercial Buildings and Public Housing	California Building Standards Commission	Textual	Design Standards	California- The Kelsey
Title 24 vs ADA: Key Accessibility Differences California Owners Must Know	CA Building Inspectors	Web	Design Standards	California
Proposed Regulation Changes with Initial Statement of Reasons	California Tax Credit Allocation Committee	Textual	Housing Policy	California
CalHFA Staff Report and Request for Loan Approval for Kelsey Ayer Station	Cal HFA	Textual	Project Context	California
Califonia QAP: Implementing the Federal and State Low Income Housing Tax Credits	California Tax Credit Allocation Committee Regulations	Textual	Housing Policy	California
Projects with HUD Section 811 Rental Subsidy (State Program) Process for Informing TCAC of Changes in an Owner's Tenant Selection Plan	California Tax Credit Allocation Committee	Textual	Housing Policy	California
$500 Million State Tax Credit for 4% Credit New Construction Multifamily Housing Frequently Asked Questions	California Tax Credit Allocation Committee	Textual	Housing Policy	California
Rent Overburden for Unsubsidized Units	California Tax Credit	Textual	Housing	California

	Allocation Committee		Policy	
Legal Rights of Persons with Disabilities	California Office of the Attorney General	Textual	Design Standards; Housing Policy	California
Final 2020 Analysis of Impediments to Fair Housing Choice	California Department of Housing and Community Development	Textual	Housing Policy	California
Affordable Housing Finance and Overview of State Programs	Cal HFA	Textual	Project Context	California
ADA in Details: Interpreting the Americans with Disabilities Act, 2nd edition	Janis Kent	Textual	Design Standards	Washington
HUD Awards Nearly $140 Million to Support Housing for People with Disabilities	Housing Finance	Textual	Housing Policy	Washington
Simplifying Accessibility Standards: A Guide to Dwelling Unit Types	Vessel Architecture	Textual	Design Standards	Washington
Accessibility Matrix	Runrberg Architecture Group	Textual	Project Context	Washington- Connection at Angle Lake
2021 International Building Code	Washington State Building Code Council	Textual	Design Standards	Washington- Connection at Angle Lake
The Arc Legacy Center- Case Statement for Support	The Arc of King County	Textual	Project Context	Washington- Connection at Angle Lake
Accessibility and Inclusion Hub- The Arc Legacy Center	The Arc of King County	Web-Based	Project Context	Washington- Connection at Angle Lake
2023 Community Engagement Response Form	Mercy Housing Northwest	Textual	Project Context; Design Standards	Washington- Connection at Angle Lake
Mercy Housing Northwest-The Arc	Mercy Housing	Textual	Project	Washington-

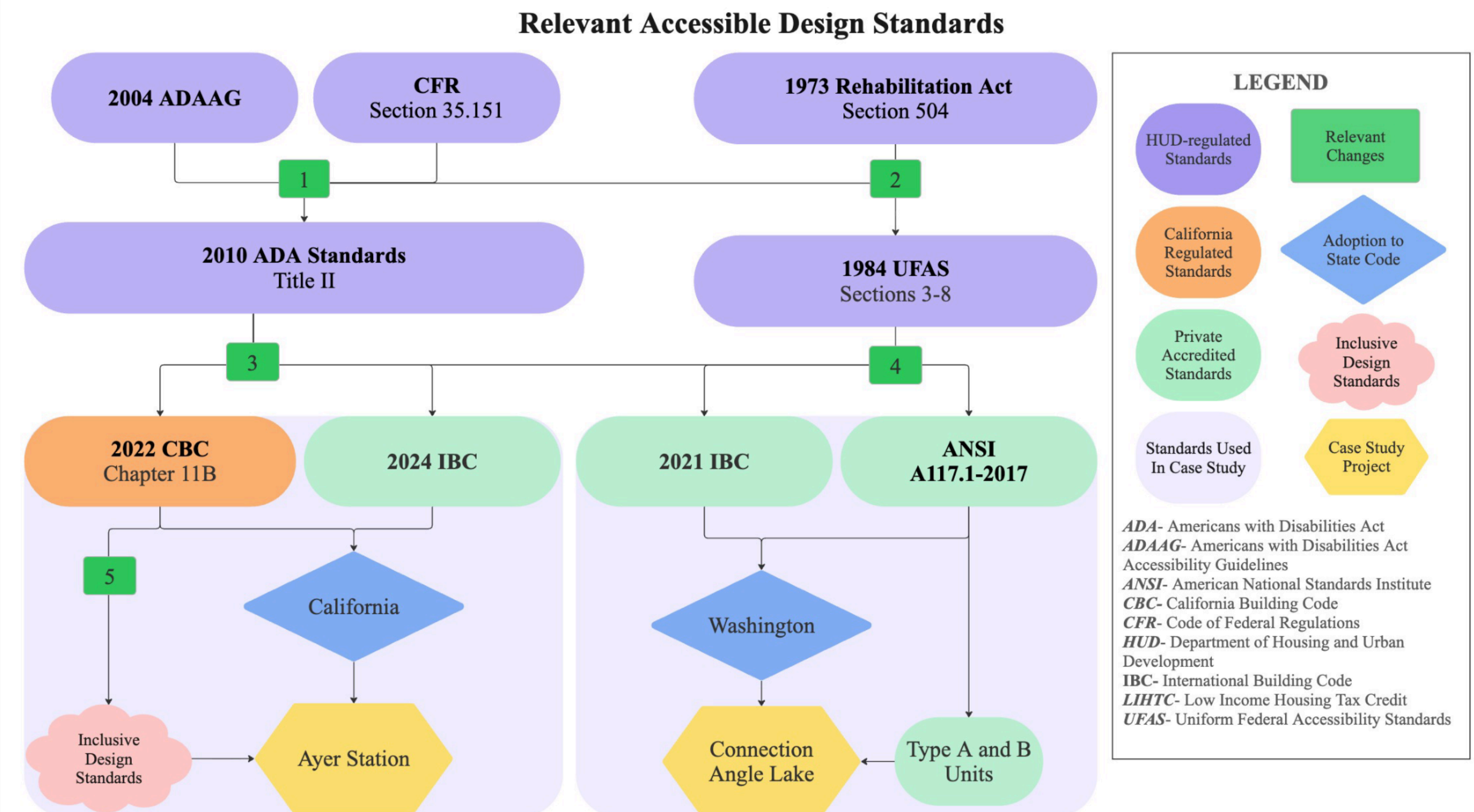
Benefit Agreement	Northwest		Context	Connection at Angle Lake
Low Income Housing Tax Credit Program Qualified Allocation plan	Washington State Housing Finance Commission	Textual	Housing Policy	Washington
2026 9% Tax Credit Program Policies	Washington State Housing Finance Commission	Textual	Housing Policy	Washington
2026 Bond/Tax Credit Program Policies	Washington State Housing Finance Commission	Textual	Housing Policy	Washington
2025-27 Biennial Investment Strategy	Washington State Department of Commerce	Textual	Housing Policy	Washington

Note: Source links are archived using the Wayback Machine.

APPENDIX C: Interview Subject Typology

Role	Number of Interviews Conducted
Housing Finance Agency Staff	1
Project Development Staff	2
Policy Development Staff	1
Design Standards Staff	1

APPENDIX D: Relevant Accessible Design Standards



1 In 2010, the 2004 ADA Standards Accessibility Guidelines were revised to include additional requirements in the federal code, which are both included in the revised 2010 ADA Standards. Projects building under the 2004 Standards must abide by the additional requirements in the CFR.

2 In 2011, the 2010 ADA Standards were permitted as an alternative to the UFAS, with certain provisions to comply with Section 504 requirements.

3 In 2023, California adopted a the 2024 IBC and a state-specific code that includes more stringent requirements than ADA Standards.

4 In 2023, Washington adopted a the 2021 IBC and ANSI codes which comply with ADA Standards.

5 The Inclusive Design Standards were created alongside the development of the Ayer Station project and include additional elements beyond the state and federal requirements.

(1)*Nondiscrimination on the Basis of Disability in Federally Assisted Programs and Activities* (p. 29671). (2014). Office of the Federal Register. https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/FR-2014-05-23.pdf
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APPENDIX E: Bond/4% Tax Credit Program Policies Side-by-Side Comparison

Policy Element	**Washington**	**California**
Points required to achieve threshold	36 points	50 points
Threshold Population Set-Aside	10% set-aside for either large families and 10% people with disabilities OR; 20% disability set-aside	None
Population Set-Aside Point Incentives	None	10 points: “Special Needs” Population set-aside
Related point incentives	● 8 points: CBO is sole or part owner ● 8 points: CBO is included in a project as a service provider ● 2 Points: CBO is contracted to conduct potential tenant engagement ● 2 points: Engagement results are implemented into project ● 1 point: Engagement results in a service provider partnership	● 3 points: Site located near a facility that operates to serve the population in the development ● 5 points: FTE service coordinator ● 5 points: FTE service specialist ● 5 points: FTE case manager

APPENDIX F: 9% Tax Credit Program Policies Side-by-Side Comparison

Policy Element	Washington	California
Points required to achieve threshold	164 points: King County 158 points: Metro County 154 points: Non-metro County	93 points
Threshold Population Set-Aside	None	None
Population Set-Aside Point Incentives	10 points: 20% set aside for disabled tenants	10 points: "Special Needs" Population set-aside
Related point incentives	Project-Based Rental Assistance (PBRA) ● 2 points: 10-15% of units ● 3 points: 26-49% of units ● 4 points: 50% or more units	● 3 points: Site located near a facility that operates to serve the population in the development ● 5 points: FTE service coordinator ● 5 points: FTE service specialist ● 5 points: FTE case manager

APPENDIX G: Case Study Funding Sources Side-by-Side Comparison

Funding Sources	**Connection Angle Lake (WA)**	**Ayer Station (CA)**
Pre-development funding	$25 million (SoundTransit TOD)	$7 million (Google Housing Fund and Weinberg Foundation)
Tax-exempt bonds	$38.2 million	$34 million
4% Tax Credit Equity	Unspecified	Unspecified
Transit-Oriented Development funding	$75 million (SoundTransit)	$10 million (VTA)
Permanent debt	None	$16 million (Cal HFA Permanent loan guaranteed by HUD)
City and County funding	$950 million (King County)	$3 million (San Jose loan) $14 million (San Jose land acquisition)
Other funding	$2 million grant (Amazon Housing Fund) $17 million low interest loan (Amazon Housing Fund)	$4.6 million

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