

The Kelsey

Housing Accessibility Study

Created for Jackson/Teton County Affordable Housing Department, Wyoming



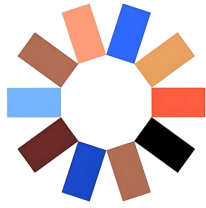


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SECTION 1:

Introduction

In 2024, the Jackson/Teton County Housing Department launched a groundbreaking collaboration with The Kelsey, a national non-profit organization advancing disability-forward housing. This partnership aims to address the accessible housing needs of Teton County, with a focus on developing housing for older adults and people with disabilities, as directed by the Jackson Town Council and Teton County Board of Commissioners.

The Kelsey brings its unique skill set of advocating for and developing disability-forward communities. Through this approach, we bring our lived experiences as disabled people and allies to everything we do. We seek to create spaces where disability is a valued part of human identity and communities. We center access, practice interdependence, and value diversity. This disability-forward lens was brought to the study to not only serve the more than 1,500 Teton County residents living with disabilities and over 3,600 residents aged 65 or older¹ but to serve the entire county by creating a more inclusive community.

When conducting this study and crafting policy recommendations, we centered the experience of 61 million people in the US living with a disability and 53% of the population impacted as a disabled person, caregiver, or family member of a person with disabilities; the individuals who rely on Supplemental Security Income and are priced out of every US housing market; the young adult with intellectual disabilities who participated in inclusive programming throughout childhood, only to find that their options to live in a community are now limited and may force them into segregated housing; and the parent dealing with end-of-life care plans considering what will happen to their middle-aged child with developmental disabilities who they've lived with their entire life.

This report aims to equip Teton County with the resources needed to create a community where housing is designed to meet these individuals' access needs. A community intentionally built to include people who have diverse access needs where one can find buildings that have features that make it possible for all people to live in an integrated, mixed income community. A community that has a network of affordable, accessible, inclusive living options—what we define as disability-forward housing.

¹ American Community Survey. (2021). 2021 American Community Survey 1-Year Estimates. U.S. Census Bureau



Acknowledgements

This study was made possible through the investment and leadership of the Community Foundation of Jackson Hole, the Jackson/Teton County Affordable Housing Department, and the many residents of Teton County who contributed their voices to the research process by participating in listening sessions, webinars, and in-depth interviews. We owe these individuals and organizations a tremendous debt of gratitude for their support and engagement.

We also extend a special thanks to the Jackson Town Council and Teton County Commissioners who initiated this work and provided essential guidance throughout the process, helping to ensure that Jackson and Teton County take a leading role in advancing inclusive community living.



SECTION 2:

Executive Summary

This report presents the findings and recommendations from a comprehensive housing accessibility study conducted in Jackson/Teton County, Wyoming. Led by The Kelsey, in collaboration with community members and technical experts, the study aims to present options to enhance the inclusivity, affordability, and accessibility of local housing for people with disabilities and older adults.

Through our research, we heard from stakeholders about the numerous barriers that older adults and adults with disabilities face in finding and retaining housing. The study included input from residents with disabilities, housing industry professionals, designers, caregivers, advocates, and service providers. This report identifies key themes that emerged consistently across these groups. We also performed an accessibility assessment of the current stock of deed-restricted units.

Inspired by these engagements, assessments, and national best practices, we have assembled recommended interventions to address the challenges identified. These recommendations focus on operational, design, and financing strategies, as well as adjustments to land use regulations to support more inclusive housing development.

Overall, this study provides a roadmap for advancing accessible and affordable housing in Jackson/Teton County, promoting a more inclusive community for all residents.





SECTION 3:

Affordability and Accessibility of Affordable and Workforce Homes

The housing stock being assessed and discussed in this report are the units with deed restrictions enforced by Teton County and the Town of Jackson via the joint Housing Department and Planning Departments, as well as those managed by Habitat for Humanity, Jackson Hole Community Housing Trust, and State/Federal entities in Low-Income Housing Tax Credit or USDA programs. Throughout the report we refer to these units as “deed-restricted units”.

Below is an inventory of all deed-restricted units built and restricted through December 31, 2023, and the pipeline of deed restricted units with anticipated completion dates in 2024 and 2025. Units owned by employers for employee housing without permanent deed restrictions not included in these numbers. “Affordable” units are those that have income and asset limits; “Workforce” units are those that require the household to earn 75% of their income locally and do not have an income limit. Both Affordable and Workforce units require that at least one adult living in the home work full-time for a local business. In the chart we identify the deeply affordable rental levels available to people on fixed incomes, like seniors or people with disabilities. State and Federal program funding housing usually incentivize deeply affordable units.

Total Units	1542	Studio	1-bed	2-bed	3-bed	4+bed	Other
Rental Units	932	139	203	196	32	3	359
<50% MFI	6	0	4	1	1	0	
50-80% MFI	19	1	10	8	0	0	
80-120% MFI	244	60	97	60	21	3	3 RV Sites
Workforce	307	78	92	127	10	0	
LDR Restricted (non-res ARUs w/o deed rest.)	177*						177
State/Federal Programs (USDA, LIHTC)	179**						179
Ownership Units	610	1	88	238	268	15	
<50% MFI	2	0	2	0	0	0	
50-80% MFI	139	0	24	47	67	1	
80-120% MFI	360	1	44	144	163	8	
Workforce	109	0	18	47	38	6	
Total Dorm Beds	257						

* from 2023 Annual Indicator Report Databook
 ** from the 2015 Workforce Housing Action Plan

Town/ Country Managed deeply affordable rentals
 Additional rentals that may be deeply affordable

Source: 2024-2025 Housing Supply Plan



Pipeline of Planned Department-Managed Units and other Deed-Restricted Units:

Estimated for Completion in 2024

Total Affordable & Workforce Restricted Units: 149 Units

- **Completed: Jackson Street Apartments Phases I & II: 57 Rental Units (48 Affordable, 9 Workforce)**, Public-Private Partnership with Teton County, the Cumming Foundation, and the Community Foundation of Jackson Hole
- **Completed: Parkside at Benson-Brown Station Phase I: 6 Ownership Units (6 Affordable)**, Public-Private Partnership with Teton County and Habitat for Humanity
- **Completed Veronica Lane Apartments: 31 Rental Units (9 Workforce)**
- **Completed: Rusty Parrot: 2 Rental Units (2 Affordable)**
- **Completed: 625, 645, 675 Powderhorn (JHMR Employee Housing): 30 Rental Units (24 Workforce)**
- **Completed: Flat Creek Apartments: 48 Rental Units (48 Affordable)**, Public-Private Partnership with the Town of Jackson, Blueline Development, and Flat Creek Partners
- **Completed: 80 E Karns: 12 Rental Units (3 Workforce)** - employee housing developed by St. John's Health

Estimated for Completion in 2025

Total Affordable & Workforce Restricted Units: 99 Units

- **Under Construction: Tract H-1: 3 Rental Units (2 Affordable, 1 Workforce)**
- **Under Construction: 3965 Antelope Lane: 3 Rental Units (1 Affordable, 2 Workforce)** -
- **Under Construction: The Glenwood Phase II: 2 Ownership Units (2 Workforce)**
- **Under Construction: Parkside at Benson-Brown Station Phase II: 6 Ownership Units (6 Affordable)**, Public-Private Partnership with Teton County and Habitat for Humanity
- **Under Construction: Astoria Park Conservancy: 2 Rental Units**
- **Under Construction: Legacy Lodge: 57 Rental Units (57 Workforce)**
- **Under Construction: Hoback Mini-Storage ARUs: 4 Rental Units (1 Affordable, 3 Workforce)**
- **Under Construction: 620 E. Hansen Ave: 20 Ownership Units (20 Affordable)** - project developed by Jackson Hole Community Housing Trust
- **Under Construction: 3555 South Park: 2 Rental Units (2 Workforce)**



Accessibility Analysis of Deed-Restricted Units:

Accurate data on the number of accessible homes in a town is often scarce. To address this gap and complement the above data on affordability levels of the deed-restricted housing stock, The Kelsey conducted an accessibility assessment of the deed-restricted housing in Jackson/Teton County. Using available data, we evaluated various housing types (townhomes, duplexes, single-family homes, and elevator buildings) and categorized them based on their likely accessibility, and infused their Walk Scores into the assessment. The categories—"Likely Accessible," "Age-In-Place Possible," and "Not Accessible"—provide a clearer understanding of how well deed-restricted housing aligns with both affordability and accessibility needs, and informs areas for future improvement.

Category Explanation:

- **Likely Accessible:** These are units that were built after the adoption of the Fair Housing Act Amendment ("FHAA") on ground floors or in elevator buildings. These units are likely to have accessible routes, doors that are at least 32 inches wide, and appropriate reach ranges for light switches and other controls.
- **Age-In-Place-Possible:** These are exempt from FHAA (e.g. townhomes, single family homes, duplexes) but only have several steps and are assumed to have a bathroom/bedroom on the ground floor.
- **Not Accessible:** Small lot townhomes, second story of garden apartments and duplexes, condos with internal staircases, accessory dwelling units (apartments) on top of commercial uses.

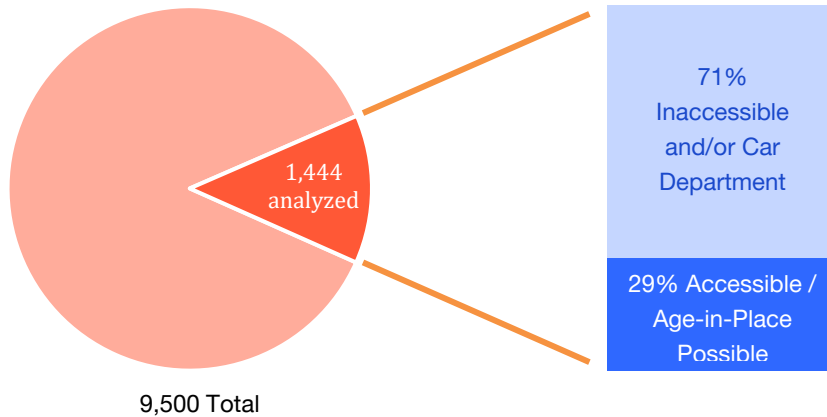
Of the data that the Jackson/Teton County Housing Department has on file for housing units, which includes both permanently deed-restricted and formerly deed-restricted, **it's estimated that 29% are Likely Accessible or Age-In-Place Possible** and located in walking distance to at least some daily errands.





Number of Occupied Housing Units in Jackson County

Share of Accessible/
Age-in-Place Possible



Detailed Data:

Total Deed Restricted Homes					
Home Type	Car Dependent	Somewhat Walkable	Very Walkable	Walker's Paradise	Total
Likely Accessible	28	156	185	14	383
Age-in-Place Possible	351	42	21		414
Not Accessible	246	272	125	4	647
Total	625	470	331	18	1,444





SECTION 4:

Themes and Perceptions from Community Engagement

The Kelsey conducted two identity-based virtual listening sessions with 15 individuals who identify as disabled, older adults, service provider, and/or a caretaker. We also conducted seven one-on-one meetings with industry professionals, self-advocates, and family advocates. These engagements provided valuable insights into the challenges and perceptions surrounding affordable, inclusive, and accessible housing in the community. This section summarizes the key community perceptions that emerged from these discussions, including the lack of deeply affordable units, the fragility of support systems, and the need for greater community integration and awareness. These findings are crucial in shaping the report's recommendations for creating a more inclusive and supportive housing environment.

Community Perception: Lack of Deeply Affordable Units to Match the Income Levels of Low-Income Disabled and Older Adult Populations and the Workforce that Supports Them

- 1. Perception that some populations are disqualified from all deed restricted affordable rental units*:** Low-income disabled and older adult populations and workers that support them need more access to deeply affordable units. Populations working limited hours and/or reliant on government assistance feel they don't meet qualification standards for deed-restricted units. However, the Housing Department does offer reasonable accommodations upon request to exempt those that cannot work full-time or income qualify for units through social insurance programs such as Supplemental Security Income (see point #3 below on increasing awareness of potential housing options).
- 2. Perception that housing is only a tool for retaining workforce:** Housing programs designed primarily to retain the workforce overlook the inherent value of housing as a fundamental need, which disproportionately affects people with disabilities and older adults on fixed incomes. In December 2024 the Housing Department amended its rules to allow retirees who worked full-time locally for 10 years prior to retirement to apply for their Affordable Rental Housing Program; this and future amendments to the program should be shared through dedicated outreach to target populations.



- 3. Disabled and older adults seeking very low-income units have experienced significant wait times.** Very low-income is defined as earning below 50% of area median income (AMI). In 2024 this equates to making below \$46,500 a year for a single-person household.
- 4. Formal support systems for disabled and older adults are fragile:** Those working in supportive fields such as assisted living, in-home support, and social services also struggle with housing affordability. Median salaries for these occupations would put Teton County residents at less than 50% of AMI².

Community Perception: Need for Integrated, Supportive and Accessible Housing Development

- 1. There is a lack of community and professional understanding of disability housing:** Listening session participants polled said the number one problem to address in local disability-inclusive housing is the lack of community awareness around disability housing and related issues.
- 2. Feelings of Isolation:** Disabled and older adults often feel isolated due to transit challenges, and live in segregated communities perceived as an invisible population amidst high rates of seasonal residents and guests. Increasing the visibility and understanding of older adults and people with disabilities can help raise awareness and support for inclusive and accessible housing.
- 3. Community Integration:** A desire for inclusive housing that blends various demographics, fostering a supportive and integrated community. This can prevent the segregation of disabled individuals and promote an interdependent neighborhood feel.
- 4. Supportive Living:** There is a need for supportive living and group homes that are not all congregated in one area. Housing should include natural supports like caregivers or community members living in proximity.
- 5. Normalizing Inclusion:** Reduce stigma by normalizing the presence and inclusion of individuals with various disabilities in integrated housing settings through intentional residential programming. For more information on intentional residential programming see the Inclusion Concierge description in the appendix.

² Assumes nationwide median hourly wage of Nursing Assistants and Home and Health Personal Care Aides at \$17.25/hour based on Bureau of Labor Statistics and a Teton County AMI of \$93K for a single individual.



Community Perception: Increasing Awareness and Access to Deed-Restricted Units

- 1. Awareness and Suitability:** Many residents are unaware of available deed-restricted accessible units and that priority for placement is given to disabled applicants when these units become available. Those that are aware stated that the units are not priced to meet the needs of families and individuals they are intended for, such as disabled residents.
- 2. Application Process:** The application process is perceived as burdensome. Disabled residents that have navigated the process have required substantial family support and knowledge.
- 3. Understanding Housing Department Policies and Approachability:** There is a misconception about the accessibility and openness of the Housing Department, which has an open-door policy that many residents are unaware of. Improved communication and education about available resources and support can help residents better navigate housing challenges.





SECTION 5:

Suggestions and Recommendations

To improve housing accessibility, affordability, and inclusivity for older adults and people with disabilities in Jackson/Teton County, we have identified several strategic and actionable interventions. These targeted steps address the specific challenges highlighted through community engagement, an analysis of current housing stock, and broader national trends. By focusing on practical, evidence-based solutions, our goal is to help Teton County implement and scale initiatives that will create meaningful change.

Our interventions are organized into three key phases of housing development: Operations, Design, and Financing.

A. Operations Interventions

This section contains recommendations that the Jackson/Teton County Housing Department can implement to create more inclusive and accessible housing program qualifications for older adults and people with disabilities. Some of the recommendations directly target disabled and older adult residents of Teton County. Other recommendations are broader but will still directly benefit these populations, as disabled and older adult residents are disproportionately excluded from affordable housing systems.

Qualifications of Residents:

- 1. The Affordable Rental and Affordable Ownership programs should be available to all applicants who income-qualify, regardless of employment status.**

All housing programs require those whose primary income is Social Security Disability Insurance (SSDI) to apply for reasonable accommodation to qualify for units. The Housing Department can instead update the Rules & Regulations to create an automatic exception to the workforce requirement for people relying on SSDI, thereby eliminating the step of applying for reasonable accommodation. This would reduce the administrative burden for the applicant and the housing program. Due to the acute housing barriers that [disabled](#) and [older adult](#) recipients of SSDI experience, it is essential that Teton County's housing programs decrease barriers for this population.



2. The Workforce Housing Programs can create more inclusive qualifications for people with disabilities of all ages who work part-time.

Jackson/Teton County can strengthen the workforce qualification to be more inclusive to those with disabilities and older adults who contribute to the local economy through part-time work but cannot earn a minimum of 75% of their income through the local economy [due to SSI asset limits](#). Changes can include adding an exemption in the Rules and Regulations that if an applicant receives SSI because of a disability and contributes to the local economy through part-time employment, they can still qualify for the Workforce Housing programs rather than applying for a reasonable accommodation.

3. Affordable and Workforce Housing Programs' weighted drawing process threshold should undergo the following improvements:

- Allow Part-Time Work to Qualify: People with disabilities on SSI should still be able to qualify for the weighted points related to employment. Many people with disabilities on SSI can and do contribute to local economies through part-time work; full time work is not always possible because of their disability, access needs, and federal limits on assets. Jackson/Teton County can consider adding “full-time or the equivalent of full-time employment,” to the weighting to be inclusive of people with disabilities who are only able to work part-time.
- Allow onset of disability or illness to qualify as “interruption of work”: In addition to the Department’s allowance of interrupted employment to care for a sick or disabled immediate family member or hospitalization, the Department can add “experiencing disability or illness” to the list of reasons a household’s employment can be interrupted. This addition can ensure that people who experience onsets of disability or illness but may not be hospitalized still have an accepted reason for “interruption of employment.”

4. For the Affordable and Workforce Housing programs, the Housing Department can enact a presumptive eligibility policy to accept weighted drawing entries marked incomplete due to delayed receipt of disability or income-related documentation.

- The Department can implement presumptive disability eligibility. Because medical providers are understaffed, receiving documentation can take substantial time. Sometimes, you must wait for an appointment with your medical provider to request the documentation, which can take months. Presumptive eligibility should also be given in these scenarios, therefore the weighted drawing entry can be marked complete.
- The Department can also implement presumptive financial eligibility for disabled people seeking to transition or actively transition from institutional settings. For individuals seeking to leave institutional settings and navigating multiple disability service systems,



securing the necessary documentation for income verification is extremely challenging and results in delays in obtaining permanent, supportive housing. Additionally, the department can provide presumptive financial eligibility for people whose sole source of income is SSDI or SSI.

- Presumptive eligibility has been successfully piloted in Los Angeles through the city’s [“Los Angeles Regional Initiative for Social Enterprise” \(LA:RISE\) Community Development Block Grant \(CDBG\)-COVID contracts](#). This program determined upfront that specific groups, including “elderly 62+ and severely disabled”, amongst others, were presumed eligible for low income housing and did not need to certify their income.

5. All housing programs can decrease the burden of credit checks on prospective residents.

It continues to disproportionately hinder housing access for disabled people, immigrant communities, and Black, Indigenous, and people of color due to systematic financial inequality. Moreover, as HUD recommends in [Guidance on Application of the Fair Housing Act to the Screening of Applicants for Rental Housing](#), “Waiving or adjusting credit screening may also be required as a reasonable accommodation if an applicant’s poor credit history is related to their disability. For example, poor credit could be caused by a gap between a loss of employment income and receipt of disability benefits.”

The Jackson/Teton County Housing Department has already made significant strides in reducing the burden of credit checks. Prospective residents can provide their own credit reports, potentially obtaining them for free. Additionally, the Department offers probationary periods that allow tenants to demonstrate their ability to pay, even if their credit score falls below the Department's preferred threshold. Finally, the Department connects prospective residents to free credit counseling services, helping them improve their credit scores to qualify for housing.

6. All Affordable and Workforce Housing Programs can create an exception to the occupancy requirements to ensure that a live-in aid does not count against the tenant's income qualifications or required household composition.

7. All Affordable Housing Programs should allow co-signers for units, which is allowable for Workforce Housing Program units.

Allowing co-signers upfront will reduce the administrative burden on the applicant and the Housing Department instead of making co-signers an exception. This will reduce barriers that extremely low—and low-income people with and without disabilities face when qualifying for housing.



8. To increase the affordability of future Workforce Housing Program units, at least 25% of future units should apply income restrictions.

Continue the trend of 2024: 149 permanently deed-restricted homes in production, including 94 units serving 80% AMI households and below. Future developments should continue to include income restrictions for 0-50% AMI and 50-80% AMI. Continue to utilize funds that allowed for the 2024 units including low income housing tax credits (LIHTC), HOME, National Housing Trust Fund (NHTF), private philanthropy, and public subsidy.

On the federal level these can be done through encouraging local developers to use income averaging for 4% and 9% LIHTC which can apply to housing units ranging from 20% to 80% AMI and averaging at 60% AMI. On the local level this can be through capital subsidies that will bring down permanent debt needed from projects to deed restrict the lowest rents for long periods of time.

B. Leasing and Property Management Interventions

1. Establish a more inclusive definition of the populations served within Teton County housing programs.

Expand the stated goal of the Housing Department from “The general goal of all housing programs covered by the Housing Department Rules and Regulations is to provide and maintain housing affordable to persons and families who make a living primarily from employment located in Teton County, Wyoming” to “The general goal... is to provide and maintain housing affordable to persons and families who make a living primarily from employment in Teton County, Wyoming, as well as to low-income adults living with disabilities and older adults on fixed incomes residing in the county.” Expand the mission statement of the Housing Department from, “The Housing Department works to create healthy housing solutions so that our workforce can live, spend, and volunteer locally, maintaining the community character we all cherish” to “The Housing Department works to create healthy housing solutions so that people who call Teton County ‘home’ can live, spend, and volunteer locally, maintaining the community character we all cherish”.

2. Increase web and app accessibility for housing programs, including the online Interest Application, which will advance Teton County’s readiness for the 2027 deadline for implementing the Title II ADA website accessibility rule.

Web and app improvements should be paired with user testing by older adults and people with disabilities.



3. Improve the Reasonable Accommodation policy to create an efficient and person-centered approach.

Make publicly available a standardized Request for Accommodation form that all property managers are encouraged to use. This standardized form should make clear that accommodation requests related to apparent impairments do not require documentation from medical professionals. For example, someone who uses a wheelchair, cane, or other auxiliary aids should not need documentation to prove that they use said visible assistive devices and, therefore, do not need documentation to prove a need for accommodation (e.g. a change in unit or parking assignment). The form should add a time period for when the Housing Department or Property Manager must respond to the request. The department should also consider offering training to ensure local property managers and other relevant staff are educated to understand the process and implementation clearly.

4. Continue your commitment to prioritizing accessible units in the weighted drawing process by expanding household member(s) who are sensory impaired, in addition to mobility impaired.

We commend the department for including the question “Is anyone in your household mobility impaired?” in the Interest Application. However, we do recommend consistent language use. The above question does not match the disclaimer when the end-user hovers over that question with their mouse. The disclaimer says: “Does anyone in your household need accessible housing because of reduced mobility or any other disability qualified under the ADA.” We strongly support this more expansive definition. However, what you are asking at the outset must correspond with the accessibility features you include in your inventory so that the system can effectively match the units.

5. Across all Affordable and Workforce housing programs, make the Verification Form for Accessible Unit Preference publicly available in all formats.

The form should share as many accessibility features as are available in the current stock. We recommend that service providers and any property management involved in deed-restricted units be educated about this form and said process.

6. Increase and/or create flexible notification and application timelines across the Department to ensure that people with disabilities and older adults who may experience accessibility-related barriers don’t miss their opportunity to obtain the unit once selected and notified. For instance, Teton County can add a question upfront to the housing applications about whether applicants will need extended time to respond due to disability-related reasons. If the applicant requests such an extension, the County can work with that applicant to identify a more accessible timeline for when the applicant



must respond. Another option is for the notification emails to include a disclaimer stating that if someone needs an extension due to disability-related reasons, they can contact XYZ to request accommodation. *Notification timelines include Housing Rules & Regulations Section 5. Weighted Drawing 5-4. Notice to Selected Households; Section 6. Purchase and Sale Standards and Procedures 6-6. Viewing of Unit & 8. Complete Application*

- 7. For the Department's Affordable and Workforce homeownership programs, create greater clarity to ensure that “approved capital improvements” can be used to fund home modifications for older adults and people with disabilities.**

- 8. Create partnerships with local service providers to increase deed-restricted unit applications from disabled and older adults.**

Partnerships with service providers can decrease common barriers that older adults and people with disabilities face when applying for units.

- 9. Require and guide property managers in publicizing open unit information,** including accessibility features, on the county website and any other applicable platforms. For even more effective use, create an internal process enabling property managers to update and advertise open units via the county website. The Department can require property managers to adopt the process over a period of 12-18 months. Unit information that is updated and advertised should include accessibility and adaptability features.

- 10. Simplify the income compliance and certification process for tenant and property management by partnering with a technology platform.**

The Housing Department can work with [Pronto Housing](#), or similar vendors, to set up the forms that they would like to accept and that property managers can easily implement.

- 11. Consider using plain language in all leasing documents, lease riders, and all resident-centered communication.**

Most leases used today are written at a graduate school level which creates a barrier for people to understand their rights and responsibilities related to their housing. Plain language is geared toward audiences with cognitive disabilities but also benefits English language learners and people with low educational attainment. To learn more about plain language in housing, visit [The Kelsey’s Plain Language Initiative](#).



C. Design Interventions

This section contains a menu of Inclusive Design recommendations that the Jackson/Teton County Housing Department can include in the [Livability Standards](#) to create a more inclusive and usable environment for people with and without disabilities. The majority of the recommendations in this document are low- to no-cost options. The Kelsey understands it may not be feasible to implement all of the recommendations, so each item has been marked with an impact identifier of high or medium (no low impact recommendations were made).

1. Kitchens (Section D.1 of Livability Standards)

A recent poll found the average American spends over 1,000 hours in the kitchen each year. The Livability Standards' superb cabinet storage requirements go a long way to ensuring residents have enough space to store their items. It is especially laudable that these requirements scale with unit type. Additionally, stating no more than two cabinets can be less than 12 inches wide ensures the actual usability of cabinets. The following recommendations allow for greater ease of use of the kitchen by people with and without disabilities.

Provide more usable cabinets and/or shelving. Adequate storage is important for a functional home, and Teton County and the Town of Jackson have done a great job ensuring space is dedicated to storage needs. To better enable the functional use of casework in kitchens, the Livability Standards can recommend the following:

- **Drawers or roll-out shelves in 50-75% of base cabinets. (Impact: High)** Replace typical drawer/door base cabinets with stacked-drawer base cabinets. This provides more usable storage space that is easier to access for someone who cannot stoop down to reach the back of base cabinets. When supplying stacked-drawer base cabinets, ensure some of the drawers are deep enough to accommodate larger items such as pots or other cookware.
- **Provide an additional shelf at the backsplash. (Impact: Medium)** Placing a shallow shelf above the countertop creates additional reachable storage. Use selectively to maintain countertop space for a microwave, toaster oven, or coffee maker. Shelves should not exceed 8 inches in depth, and should be mounted no higher than 46 inches from the finished floor.

Require sink hardware that is easier to manipulate. The right sink hardware can increase the usability of sinks in kitchens. The Livability Standards can specify feature requirements for sink faucets to create a better user experience for everyone.



- **Faucets should have a single lever for water flow and temperature control. (Impact: High)** Levers are easier to control for people with less dexterity, and a single lever system allows for better manipulation of flow and temperature.
- **Include a pull-out faucet at kitchen sinks. (Impact: Medium)** This provides more flexible cleaning options for people with limited reach. Pull-out faucets also make it easier to clean the sink and larger dishes like pots and pans.

Specify appliance location requirements. The location of an appliance can directly impact the usability of a kitchen. Ensuring appliances are appropriately placed will make a kitchen more functional for people with and without disabilities.

- **If a dishwasher is provided, position it for easier use and to avoid obstructing traffic when open. (Impact: High)** Place dishwashers next to a sink and avoid corner placement that blocks access for putting away clean dishes and cutlery. If placing dishwashers in islands, avoid placing ovens or refrigerators directly across from them so there is no conflict when doors are open.
- **Locate refrigerators so the door can swing open 180 degrees. (Impact: High)** A refrigerator door open at 90 degrees is an impediment to positioning a mobility device for a user to access refrigerator contents. Additionally, many refrigerators require the door to open more than 90 degrees to remove trays for cleaning. Requiring a 180-degree door swing ensures maximum usability.

2. Bathrooms (Section D.2 of Livability Standards)

There are many very specific requirements already in place that make a bathroom accessible; the recommendations below are ways to make a bathroom more inclusive, outside of codes and regulations.

Require grab bar backing for toilets, tubs, and showers in all bathrooms, not just accessible bathrooms. (Impact: High) Including backing during the initial construction saves time and money when grab bars need to be installed at a later date. Specify backing to be from 2x10 material to provide more flexibility in installation heights for future tenant needs that may differ from standard heights.

Position toilets in a corner. (Impact: Medium) Corner placement allows side and rear fixed grab bars to be installed, rather than flip-down or floor-mounted grab bars when toilets are between a vanity and a tub or shower. If grab bars need to be removed after installation, it is less expensive to patch a wall than to replace flooring from a floor-mounted grab bar. Positioning a toilet in a corner may also provide more maneuvering clearance for people in mobility devices.



Specify accessible toilets. (Impact: High) Trip levers should be on the front of the tank and on the side of the toilet that is away from the wall for easier reach and approach. The trip lever's default position should be horizontal for easier use and for people who may need to use an elbow to flush. Do not allow push-button flushers as these require more dexterity and force than lever flushers.

Require sink hardware that is easier to manipulate. The right sink hardware can increase the usability of sinks in bathrooms. The Livability Standards can specify feature requirements for sink faucets that will create a better user experience for everyone.

- **Faucets should have a single lever for water flow and temperature control. (Impact: High)** Levers are easier to control for people with less dexterity, and a single lever system allows for better manipulation of flow and temperature.
- **Select longer spouts at bathroom faucets. (Impact: Medium)** This brings the water closer to the user. A longer spout makes it easier for people who are seated or who have limited reach to use the sink.

Specify textured or non-slip flooring. (Impact: High) People with mobility aids or other instability are more likely to slip on a wet bathroom floor. Textured/non-slip flooring safeguards everyone on a wet floor or with wet feet getting out of a bathtub or shower.

3. Closet and Storage Areas (Section D.3 of Livability Standards)

Storage is often an afterthought during the design process, but it directly affects the functionality of a home. By including minimum storage requirements, Teton County and the Town of Jackson are ensuring residents can have a place for everything and avoid clutter; clutter can be detrimental to mobility. Having minimum closet depth and width requirements ensures the unit closets are actually usable and can store an adequate amount of clothing, linens, or other items. Requiring the different types of closets also ensures residents have adequate storage in important areas, like the unit entry. The requirement for mechanical equipment to be separate from storage space is especially commendable. The recommendations below are intended to enhance the outstanding requirements already in place.

Provide accessible closet storage within the unit. (Impact: High) Closet door openings should be a minimum of 32 inches clear width for a forward approach. This allows a person using a mobility device to enter the closet. Additionally, include closet rods or shelves that are adjustable between 36 and 60 inches from the finished floor for flexible use by people with different reach abilities. For a closet shelf/rod to be considered



adjustable, it must be able to be moved by a maintenance person using a screwdriver or other hand tool. This does not apply to linen closets as they are not typically designed to allow entry.

Wardrobes have adjustable rods and shelves. (Impact: High) Some developers prefer to use wardrobes in lieu of closets because they are easy to replace. If wardrobes are used, ensure they have pre-drilled holes to allow the hanging rods and shelves to be adjusted to different heights.

4. Floor Coverings (Section D.4 of Livability Standards)

Selecting the right flooring for units can be a complex process. Developers and architects will want to consider durability, ease of maintenance, cleaning, and suitability for the spaces within a dwelling unit. The recommendations below aim to help narrow down the choices during the decision-making process.

Use hard surfaces rather than carpet. (Impact: High) Hard surfaces are easier to clean and maintain, are more durable than carpet, and typically do not need to be replaced between leases. Hard surfaces allow people in mobility devices to move around the unit more easily, and with less exertion. Hard surfaces also harbor fewer allergens, which is better for people with allergies or compromised immune systems.

Specify low- or no-VOC materials. (Impact: High) Volatile Organic Compounds (VOCs) are a large group of chemical compounds that can vaporize into the air and dissolve in water. Many people with disabilities have underlying health conditions that are exacerbated by chemicals in their environment. Low- and no-VOC materials emit fewer dangerous chemicals, which can reduce the risk of headaches, dizziness, and respiratory problems. Requiring low- or no-VOC flooring reduces environmental hazards to all residents and visitors. (Note: this recommendation may come with a higher cost associated as low- to no-VOC products tend to be more expensive.)

5. Room Sizes and Shapes (Section D.5 of Livability Standards)

The Livability Standards' room size and functional layout requirements ensure units have enough space for a person to comfortably move in and around the area. Additionally, requiring realistic and functional floor plans is an excellent way to ensure a person's mobility throughout the unit. The recommendations below aim to secure enough space for someone in a mobility device to move around in entrances and hallways.



Require additional turning space. (Impact: Medium) Provide a 67-inch minimum diameter circle for turning, connected to a path of travel from the door. The ADA requires a 60-inch turnaround, but The Kelsey recommends adding an additional 7 inches to this figure. This ensures adequate space for a mobility device to enter, turn around in, and exit rooms.

Unit hallways are a minimum of 42 inches wide. (Impact: High) This allows for easier turns through doors perpendicular to the hallway for people with mobility devices vs. the standard 36-inch hallways. In narrow hallways, a 90-degree turn into bedrooms and bathrooms is difficult to accomplish without scraping doors and wall surfaces.

6. Standards (Section F.1 of Livability Standards)

The Livability Standards' section on Standards for Conversions of Existing Housing Stock identifies many requirements to ensure new tenants will move into clean, up-to-date units. The recommendation below may add additional costs, but will create a safer, healthier environment.

Paints and Flooring: Specify low- or no-VOC materials. (Impact: High) Volatile Organic Compounds (VOCs) are a large group of chemical compounds that can vaporize into the air and dissolve in water. Many people with disabilities have underlying health conditions that are exacerbated by chemicals in their environment. Low- and no-VOC materials emit fewer dangerous chemicals, which can reduce the risk of headaches, dizziness, and respiratory problems. Requiring low- or no-VOC materials reduces environmental hazards to all residents and visitors. (Note: this recommendation may come with a higher cost associated as low- to no-VOC products tend to be more expensive.)

In addition to the above design interventions the Jackson/Teton County Housing Department can embed disability-forward design incentives within housing-related funding efforts. Incentives can be added to future Teton County housing-related Requests for Proposals for development partners to encourage applicants to go beyond minimum levels of accessibility, including tying funding sources to the use of guidelines such as the [Inclusive Design Standards](#). The incentives are most effective when a point or tie-breaker structure is established.



D. Financing Interventions

This section outlines the financial interventions needed to bring supportive, affordable, disability inclusive housing to Jackson/Teton County. These interventions are hypothetically if they were applied to one affordable housing project of around 100 units with average rents at 60% AMI. All subsidies listed are *in addition* to any subsidy already needed to make the 100% affordable housing project feasible. It also assumes the project is an elevator-equipped apartment building or another building type that is accessible by design.

This analysis covers costs associated with hiring resident services staff, setting aside units for on-site staff, designing disability-forward amenities, and bringing down rents to levels that are affordable to people on SSI. In aggregate these would require \$225,000 per unit additional subsidy for 25 permanent affordable homes with sustainable funding for supportive services coordination; these 25 homes would be for residents with disabilities who otherwise would not be able to live independently. The table below ranks each recommendation by priority and details how they affect project finances, including changes in operating income, rental income, and needed subsidies.

Recommendation	How it Would Impact an affordable Tax Credit Project Financially	Cumulative Additional Support Needed
Hiring 2 Full-time Resident Services Staff	Total increase of operating income by \$180K; reduction of mortgage by \$2.3M	\$2,300,000
Set aside 1 unit for on-site staff	Total decrease of rental income of \$20K; reduction of mortgage by \$225K	\$2,525,000
Designing amenity space to be more disability-forward	Increase construction costs by \$200K; increase in subsidy needed	\$2,725,000
Reducing rents of 25 apartments affordable for people on SSI	Total annual decrease in rental income of \$224K reducing rents from 60% AMI to 30% AMI; reduction of mortgage by \$2.9M	\$5,625,000



The Housing Department and local developers should explore these federal subsidies to evaluate whether they could be combined with local affordable housing subsidies to make an affordable, supportive and disability inclusive project possible.

- Explore **HUD Section 811** for capital advance for the 25 units set aside for people with disabilities; this could bring an additional subsidy of \$214K per unit. We understand that HUD will issue a Notice of Funding Availability soon to which a developer can apply directly next year.
- Explore **HUD Section 202** for the senior units in a specific building. This is an annual application, and with the use of this subsidy you can create age-restricted units for seniors without having to set aside 80% of a building to 55+.
- Explore creating an inter-municipal agreement with Rock Springs or other Wyoming-based housing authority to apply and administer vouchers on Teton County's behalf. **HUD Mainstream Vouchers**, available to non-elderly people with disabilities, may become available in 2025.
- Explore the **Capital Magnet** program administered by the Community Development Financial Institutions (CDFI) Fund. In 2024, Wyoming was a preferred location for these funds. Applications will open again in Q1 of 2025.

To see how the above financing approaches can be implemented in a real-life housing development, please refer to The Kelsey Ayer Station (San Jose, CA) case study. This case study provides detailed information on the funding sources used to support resident services staff, on-site living for staff, and disability-forward design. The case study can be found [here](#).



E. Land Use Interventions

1. Incentive accessibility by creating a local density bonus program for accessible or age-in-place housing.

Allow for higher density if the developer commits to increasing accessibility beyond the minimum standards and implementing guidelines such as the Inclusive Design Standards or by deed restricting units to prioritized populations.

2. Educate stakeholders on encouraging accessible by design

- Collaborate with the development community to identify and implement cost-effective measures for improving accessibility.
- Educate the Design Review Committee (DRC) on the types of designs that are accessible. This education effort may help resolve design preferences that discourage large buildings and decrease the rate of elevator accessibility. Larger buildings can financially support elevators and lead to more options for people with disabilities and people looking to age-in-place. Rather than banning large buildings, a more design-forward approach to breaking up the buildings can include:
 - Recessions and projections to break up massing
 - Materials vary with changes in building plane
 - Façades are divided into proportions that include a top, middle, and base
 - The use of awnings, juliet balconies, and other design features to soften façades; enable developers to keep these as design elements to manage construction costs
 - Intentional landscaping such as trees complimented with low-lying bushes
 - Side elevations are consistent with front; materials do not change at the vertex of a corner

Cloudveil Hotel Example - 76,000 square ft. and 3 total elevators



West Elevation
SCALE: 1/8" = 1' - 0"



3. Encourage the adoption of housing types that are inherently more accessible.

Pre-approve diverse, accessible form-based neighborhood housing types for easy implementation within existing height and bulk requirements. Table below outlines how zoning should be adapted to allow encourage more accessible housing types

Type	Detached House	Cottage Court	Duplex/ Small Multiplex	Medium to Large Multiplex
Number of Units	1 Unit (typical 55 x 100 lot)	4-8 Units (typical 100 x 100 lot)	2-4 units (typical 55 x 100 lot)	5-10+ units on (typical 80 x 100+ lot)
Considerations	ADUs should be encouraged through pre-approved plans create more multi-generational housing opportunities	Parking should be encouraged within side setbacks to maintain shared courtyard	Units should be encouraged to be stacked to increase number of accessible homes	Elevators should be encouraged for any building over 3 stories; massing break-ups that create smaller buildings of 4 and fewer units should be discouraged
Where it should be allowed	Encouraged at the edges of residential and rural zones	Across all residential zones	Across all residential zones; has appearance of large home	Where height limits allow (density limits should be removed)



Appendix

Definitions of Key Terms³

Accessibility:

Accessibility is the idea that people with disabilities can easily use something. Housing is accessible when disabled people can easily use their home, such as they can move around their home with ease because of wider doorways for wheelchair/power chair users, use their appliances with ease, or understand their leasing agreements and home/building rules.

Accessible Unit:

In the context of residential dwelling units, the term “accessible” is a catchall term for unit types with varying accessibility features; in this report, “accessible units” are best understood as representing a spectrum of accessibility for people with disabilities.

There are three types of accessibility features required in publicly-funded or affordable housing under International Code Council (ICC) requirements • Mobility features: An accessible dwelling unit constructed for a person using a wheelchair which provides a higher level of accessibility than an adaptable unit. • Communication features: An accessible dwelling unit constructed with audible and visual elements such as visual doorbell alarms, visual fire alarm pre-wiring, and TTY features. • Adaptable units: An accessible dwelling unit within a covered multifamily building as designed with elements and spaces allowing the dwelling unit to be adapted or adjusted to accommodate the user.

Accessibility Standards:

The Americans with Disabilities Act (ADA) is a civil rights law that prohibits discrimination against individuals with disabilities and aims at achieving equal access to community life. It gives people with disabilities the right to file lawsuits in Federal court and obtain Federal court orders to stop ADA violations. In multifamily housing, regardless of the source of funding, common areas that are open to the public are covered under ADA protections.

³ Sources include: [Shelterforce, "Alphabet Soup: Breaking Down All Those Housing and Community Development Terms" \(accessed September 2024\)](#) and [The Kelsey " Housing and Disability Glossary of Terms" \(Accessed September 2024\)](#).



The U.S. Fair Housing Amendments Act (FHAA), while not a building code, prohibits discrimination in housing, and it includes design and construction requirements for multifamily housing to ensure housing is “readily adaptable” for individuals with disabilities. Readily adaptable means that unit features are such that they can easily be made accessible. FHAA applies to all multi-family residential buildings, regardless of funding source, built or significantly rehabilitated since 1991.

Section 504 of the Rehabilitation Act: All Federally assisted new construction housing developments with 5 or more units must design and construct 5 percent of the dwelling units, or at least one unit, whichever is greater, to be accessible for persons with mobility disabilities. These units must be constructed in accordance with the Uniform Federal Accessibility Standards (UFAS) or a standard that is equivalent or stricter. An additional 2 percent of the dwelling units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities.

Area Median Income (AMI):

Income thresholds that are set relative to the area median income, e.g., 20% AMI, 50%, 80% AMI—to identify household eligibility in income-restricted housing units. 100% AMI is the midpoint of a region’s income distribution—half of families in a region earn more than the median and half earn less than the median. Teton County AMI levels [are available here](#) and are locally referred to as Median Family Incomes or MFI.

Deed Restricted Units:

Deed-restricted units are housing units that have specific legal restrictions placed on them to ensure they remain designated for certain uses or ownership statuses over a set period. These restrictions are typically recorded in the property's deed and can limit the property's sale price, rental price, or who is eligible to purchase or rent the unit.

The goal of deed restrictions is to maintain a designated use or ownership status of the housing, which might include restrictions related to income levels, occupancy, or other criteria as determined by local governments, nonprofit organizations, or private developers. These units are often part of programs aimed at supporting particular community needs, and the restrictions can last for decades or even in perpetuity.

Deeply Affordable:

Typically, this means the rent for the unit is set at a level that is affordable for households earning 30% or less of the area median income (AMI). Deeply affordable units are often targeted at people who are experiencing homelessness, seniors and people with disabilities on fixed incomes, or individuals and families relying on public assistance.

**Developmental Disability:**

A term that refers to a significant and chronic disability that is attributable to a mental or physical impairment that begins before an individual reaches adulthood. These disabilities include but are not limited to intellectual disability, cerebral palsy, down syndrome, epilepsy, autism, and other disabilities closely related to or requiring similar treatment.

Disability:

A term that is part of human diversity, like any other aspect of a person's identity, such as race, ethnicity, sexual orientation, gender identity, or religion. Disability does not change the right of individuals with disabilities to live independently or in a community, enjoy self-determination, make choices, be included in and belong in society, and experience inclusion in the economic, political, social, cultural, and educational areas of society.

Disability-Forward:

A term that centers on the perspective of people with disabilities and the recognition of designing spaces, policies, and programs for disability access and inclusion to advance opportunities for everyone. Disability-forward recognizes disability as an identity that is valued and visible, and creates spaces where people of all identities are seen, welcomed, and supported. A disability-forward approach advances inclusion and creates access not to solve or downplay disability, but to include and embrace it.

Fair Market Rent:

Fair Market Rents (FMRs) are determined by HUD to determine payment standard amounts for the Housing Choice Voucher program, initial renewal rents for some expiring project-based Section 8 contracts, initial rents for housing assistance payment (HAP) contracts in the Moderate Rehabilitation Single Room Occupancy program (Mod Rehab), rent ceilings for rental units in both the HOME Investment Partnerships program and the Emergency Solutions Grants program, maximum award amounts for Continuum of Care recipients and the maximum amount of rent a recipient may pay for property leased with Continuum of Care funds, and flat rents in Public Housing units.

Fair market rents are available [on the Housing Department's website](#) with utilities (water/sewer, electricity, gas and trash removal) included. Dorm rooms are 75% of Studio.

Housing Choice Voucher/ Section 8:

A federal rent-subsidy program under Section 8 of the U.S. Housing Act, which issues rent vouchers to eligible households. The voucher payment subsidizes the difference between the gross rent and the tenant's contribution of 30% of adjusted income, (or 10% of gross income,



whichever is greater). Housing Choice Vouchers do not fall under the Section 504 of the Rehabilitation Act.

Low-Income Housing Tax Credit (LIHTC) (often pronounced “lie-tech”):

A program within the U.S. Treasury Department that provides tax credits for investing in the construction or renovation of affordable housing.

Multifamily Housing:

Multifamily housing means a building or group of buildings where many families live in separate homes under one roof. It could be apartments, condos, or townhouses, where each family has its own space, but they all share the same building or complex.

PBRA – Project-Based Rental Assistance (commonly known as project-based Section 8 or Section 811):

Federal assistance for privately owned housing that stays with a given unit, rather than a given tenant.

Reasonable Accommodations:

Reasonable accommodations for renters with disabilities involve modifications or adjustments to a rental unit or policies, ensuring equal access and enjoyment of housing unless the modification causes undue financial hardship or a fundamental change in operations. These accommodations address barriers such as physical modifications, policy adjustments, communication accessibility, assistive technology, flexible lease terms, and prioritizing accessible units, made for the individual's needs. Landlords typically must provide such accommodations under fair housing laws, like the Fair Housing Act in the United States.

Type A Unit:

Is a category of accessible housing designed to meet stringent accessibility standards, ensuring that the living environment is usable by individuals with physical disabilities. These units are typically mandated by local, state, or federal building codes and are more comprehensively equipped than Type B units.

Key features of a Type A unit include:

- **Enhanced Maneuverability:** These units provide greater space in rooms and corridors to accommodate wheelchairs. This includes wider doorways, hallways, and turning radii in rooms such as kitchens and bathrooms.



- **Accessible Kitchen:** Kitchens in Type A units are designed to be fully usable by individuals with disabilities. This includes features like lower countertops, accessible appliances, and clear floor space to allow for wheelchair maneuverability.
- **Accessible Bathroom:** Bathrooms feature roll-in showers or accessible bathtubs, grab bars, and clear floor space for wheelchair access. Fixtures like sinks and toilets are also designed to be accessible.
- **Usable Controls:** Light switches, electrical outlets, thermostats, and other controls are placed within accessible reach ranges, generally between 15 inches and 48 inches from the floor.
- **Accessible Routes:** There are accessible routes throughout the unit and to essential areas outside the unit, such as parking spaces, mailboxes, and community amenities.

Type A units are designed to comply with the standards set by the Americans with Disabilities Act (ADA), the Fair Housing Act (FHA), and other local accessibility codes. They are intended to accommodate individuals who have significant mobility impairments and require a living space that is fully functional and accessible.

Type B Unit:

A Type B unit is a category of housing designed to be more accessible than standard units but not as comprehensively accessible as Type A units. These units are intended to provide a basic level of accessibility for individuals who do not have significant mobility impairments but may still require some accessible features.

Key features of a Type B unit include:

- **Accessible Entrances:** At least one entrance to the unit is accessible, typically featuring no-step entries or ramps.
- **Basic Maneuverability:** The unit provides enough space for a wheelchair to navigate the main living areas, but the maneuverability and clear floor space requirements are less stringent than in Type A units.
- **Accessible Bathroom:** Bathrooms in Type B units typically include basic accessibility features such as reinforced walls for future grab bar installation, lower light switches, and accessible sinks and toilets.



- Accessible Kitchen: Kitchens have basic accessibility features, such as lower countertops and accessible appliances, but do not necessarily include the extensive modifications found in Type A units.
- Usable Controls: Light switches, electrical outlets, thermostats, and other controls are placed within accessible reach ranges, generally between 15 inches and 48 inches from the floor.

Type B units are designed to comply with the Fair Housing Act (FHA) requirements for accessibility but are generally intended to provide a more affordable and less intensive level of accessibility compared to Type A units. These units are suitable for individuals who need some accessibility features but do not require the extensive accommodations found in Type A units.





Inclusion Concierge and Housing Related Services Overview

The Kelsey (“TK”) is a non-profit, 501(c)(3) housing organization, dedicated to building disability-forward housing communities that are affordable, accessible, and inclusive. People with disabilities have historically struggled to obtain and maintain quality, appropriate, community-based housing opportunities. Housing providers have been challenged to effectively house them, due to the fact that many disabled individuals require some level of accommodation and support in conjunction with provision of housing units in order to live safely and thrive in a community-based setting. Part of the challenge stems from the fact that the disability community is not homogenous. While individuals with mobility and sensory disabilities may be able to have their living experience accommodated through structural alterations in specific building features, that is only a portion of the population. There are individuals with intellectual and/or developmental disabilities experiencing life with increased cognitive access and support needs, people with self-care related disabilities, people who are medically fragile, and people with co-occurring disabilities including mental health needs. These individuals require coordinated support to access, navigate, and retain housing. These individuals are also considered to have among the most acute needs of disabled individuals, and often the most underserved in housing in an already underserved population. TK has explicitly identified these individuals as a target population who will be specifically marketed to and served in our inclusive communities.

TK approaches provision of such support through our Inclusion Concierge (“IC”) program. Based on focus groups with disabled individuals and their caretakers, best-practices from federal regulations and policies, and case-studies from existing and historic disability-serving and other ‘special needs’ housing models, ICs are a fundamental element to keeping people with disabilities housed and supporting a thriving community life. The program supports housing retention, sustained and quality service delivery, enhances inclusivity, and allows people with and without disabilities to share an interconnected community. It has been shown to lead to decreased unit turnover and better health outcomes. ICs are not direct service providers, but rather serve as an essential bridge between housing and services and also support residents in accessing activities, supports, and relationships that support their personal goals and passions.

The lessons learned from outcomes at our test case site have demonstrated strong ICs support connection to greater housing retention rates. Given the urgent and important needs of our resident population and considering market needs, we believe our model would function best with at least two IC staff at each of our properties. This memorandum provides some background and details on the functioning of the IC program as envisioned, and demonstrates the threshold need for staffing.



The Inclusion Concierge Program

The Inclusion Concierge (“IC”) is staff designed with and for people with disabilities who plays a daily role in a resident's housing experience, fosters inclusion, supports quality community services, and promotes connections between neighbors and the surrounding community. The IC creates a welcoming environment, runs programs for inclusion, and supports service delivery and coordination. The IC team plays a key role in partnering with the property management and maintenance teams to facilitate housing related services in the case of an interruption in or failure of in-home services, issues that could result in eviction or housing loss, and crisis stabilization.

Our communities target people with disabilities who use Medicaid Home and Community Based Services (HCBS), including but not limited to IHSS, Regional Center, Services, and Self-Determined programs and among this population target those with moderate to significant support needs who are extremely low income with emphasis on individuals from marginalized communities. These individuals are individuals who would have historically been institutionalized, served in congregate settings, or unhoused. These individuals who are low income and/or from multiply-marginalized communities generally lack parent or other natural support systems that higher income and white individuals supplement their service systems with. The IC program focuses on housing navigation and service linkages to specifically address the gaps in existing systems for this historically under or un-housed group to ensure they access and maintain housing success alongside positive community outcomes.

The IC concept is innovative and based on years of research, including focus groups and human centered design workshops, visits to existing communities, and input from people with lived experience as people with disabilities, service providers, and family members. The concept fits within The TK’s team-based “Triangle of Community Living,” which is coordinated by the IC and places the resident at the center:

Program Mechanics and Offerings

The IC program involves coordination between property management and maintenance staff, natural supports, and partner agencies through regular “stand-ups,” and easy, engaging

information-sharing tools managed by TK. This team-based approach allows participants to lean into each other’s expertise to deliver the best possible, inclusive and connected resident experience, with high quality and efficient services, while avoiding burnout and missed opportunities and missteps. TK’s IC program prioritizes a resident-centered approach, culture of interconnectivity, and pursuit of a robust services infrastructure, offering support to residents in different capacities across the stages of residency at TK’s properties. These stages include from pre-lease-up and move-in, to ongoing resident support and emergency services supplements.

All IC team members receive disability inclusion training, and work to translate TK’s IC principles to the resident experience through established pathways, including: monthly check-ins on residents with disabilities; staff coordination and proactive response around residents



with support needs, front desk and community presence, programming and inclusion hours where social cohesion is thoughtfully promoted through classes, activities, film screenings, and discussions of current events in accessible community spaces; reviews of leasing agreements for inclusive language and approach, mitigating risk and liability of disability or other discrimination; maintenance of an up to date emergency services plan; coordination with community partners (Supportive Services Providers, Independent Living Centers, etc) to identify and form Circles of Support with formal and informal connections that help residents live independently; and managing a curated list of available and high quality community resources and service provider contacts (including employment, personal care services/respite care, translation services, advocacy support, healthcare needs, etc.) within the community.

Beyond supporting the needs of disabled residents, the IC also creates a culture of mutual support between all residents within the building, encouraging a natural ability and interest for residents to connect with each other and the surrounding community, furthering TK's vision to provide the best housing experience for all residents regardless of disability status and income. Mid-way through the initial lease term, the IC reaches out to every resident to understand feedback for the community and what could make their experience better.

Responding to Resident Needs and Changing Systems

Based on focus groups and interviews we have heard that residents feel property management across property-types can have reactive responses to resident challenges and dated approaches to community and experience programs. We also know property managers have significant and specific responsibilities around asset maintenance and compliance that do not always allow individualized supports, cognitive access modifications, and the specific supports required for people with those needs. The IC program is created to address these gaps.

Additionally, with the broader implementation of the Medicaid HCBS Settings Rule and increased federal and state emphasis on transition to community-based living for people with disabilities, new models are needed to both decouple housing and services so that people with disabilities can make choices about their housing and services independently, but also ensure people with support needs, especially acute, are able to maintain housing success. The IC program is specifically designed to address this existing gap in housing and services as is being tracked as a national pilot model by federal agencies as part of broader efforts to increase housing outcomes and available subsidies to support people with disabilities.