



The Ability Center

August 13, 2021

Attn: 2021 Design & Architectural Standards
Ohio Housing Finance Agency
57 E. Main St.
Columbus, Ohio 43215

SENT VIA E-MAIL TO: QAP@ohiohome.org.

To Whom it May Concern:

I am writing on behalf of The Ability Center of Greater Toledo to offer comment on the Ohio Housing Finance Agency recently published 2021 Design and Architectural Standards.

The Ability Center of Greater Toledo is a Center for Independent Living that serves Northwest Ohio. Our mission is to assist people with disabilities to live, work, and socialize within a fully accessible community. Thus, we have great interest in making sure that design and architectural plans are optimal in assisting people with disabilities, so that they may reside and participate in activities in the setting of their choosing and have full supports in place for them to live independently outside of an institutionalized setting.

We urge that, in order remain compliant with the Fair Housing Act, Section 504 obligations, the state of Ohio remain vigilant and put procedures in place to ensure that people with disabilities have equitable access to housing.

Comments on Site and Exterior Requirements:

As detailed under section 2.1 of the community integration requirements, developers are to create the most integrated setting possible for residents. We applaud this decision.

We urge that you consider the following:

- Under section 4.1, there is no mention of accessible entry; we recommend that entrances should be accessible to wheelchair users and other mobility devices.
- All accessible entrances should connect to municipal sidewalks that are on a public transit line. This will create optimal independence for residents who have a mobile disability and follow guidelines of community integration as described in section 2.2. If possible, seating should be offered.
- Under section 5.1, parking should comply with 2010 Standards for accessible design under the American with Disabilities Act.¹
- For Outdoor Recreational Features, under section 8.1, recreation areas should be on an accessible route from the entrance and site arrival points.

¹ **U.S. Department of Justice.** Civil Rights Division. *Disability Rights Section*
https://www.ada.gov/restriping_parking/restriping2015.html



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Comments on Interior Requirements:

We urge that you consider the following:

- Section 4.2.1 states that requirements for elevators do not apply to single family homes, 1, 2, or 3-family dwellings, or townhouses. We recommend that all buildings that exceed two stories should have elevators available.

Comments on Appendix A:

Historic Preservations:

Historic buildings are not an exception to accessibility requirements. We recommend that OHFA should require an application for exceptions even in historic buildings to ensure accessibility requirements are met.

Comments on Appendix B:

We recommend that Universal Design should be encouraged for all housing units. The list provided under Appendix B, which is currently considered listed as a way to gain incentive points, includes several items that are mandated for all new, multi-family buildings under the Fair Housing Act, and therefore should not be listed as optional. We have also attached a Visitability checklist that The Ability Center uses for universal design projects.

Thank you for this opportunity to comment, and please feel free to reach out with any questions.

Sincerely,

Katie Hunt Thomas
Disability Rights Attorney

Veralucia Mendoza
Disability Rights Advocate