

To: The Ohio Housing Finance Agency
From: The Ability Center of Greater Toledo
Date: May 25, 2024

RE: OFHA's FY2024-2025 Annual Plan Draft.

To Whom it May Concern:

Thank you for the opportunity to provide public comment on the OFHA's FY2024-2025 annual plan draft. On behalf of The Ability Center of Greater Toledo, we ask that the OFHA consider our recommendations to be incorporated into OFHA's completed FY2024-2025 annual plan.

The Ability Center of Greater Toledo is a Center for Independent Living which serves 13 counties in NW Ohio. Our mission is to make Toledo the most disability friendly in the nation by increasing independence for people with disabilities, discovering true passions, and changing the community's perception of disability.

I. Background

Housing is a paradigmatic example of a social determinant of health, as it both influences and is influenced by various structural determinants, including social, macroeconomic, and public policies, politics, education, income, and ethnicity.¹ These factors intersect to shape the health and well-being of populations.² Recent housing trends in the United States highlight the long-term effects of unequal access to housing, creating barriers related to cost (housing affordability), conditions (housing quality and accessibility), consistency (residential stability), and context (neighborhood opportunity).³ Americans with disabilities are particularly affected by the severe affordable housing crisis. For this growing population, finding and retaining

¹ Mwoka, M., Biermann, O., Ettman, C. K., Abdalla, S. M., Ambuko, J., Pearson, M., Rashid, S. F., Zeinali, Z., Galea, S., Valladares, L. M., & Mberu, B. (2021b, August). *Housing as a social determinant of health: Evidence from Singapore, the UK, and Kenya: The 3-D commission*. Journal of urban health : bulletin of the New York Academy of Medicine. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8415197/#:~:text=Housing%20is%20a%20paradigmatic%20example,and%20well%20being%20of%20populations.>

² Mwoka, M., Biermann, O., Ettman, C. K., Abdalla, S. M., Ambuko, J., Pearson, M., Rashid, S. F., Zeinali, Z., Galea, S., Valladares, L. M., & Mberu, B. (2021b, August). *Housing as a social determinant of health: Evidence from Singapore, the UK, and Kenya: The 3-D commission*. Journal of urban health : bulletin of the New York Academy of Medicine. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8415197/#:~:text=Housing%20is%20a%20paradigmatic%20example,and%20well%20being%20of%20populations.>

³ Swope, C. B., & Hernández, D. (2019, December). *Housing as a determinant of health equity: A conceptual model*. Social science & medicine (1982). <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7146083/>

accessible and affordable community-based housing presents even greater challenges.⁴ In Ohio, as in the rest of the nation, people with disabilities face numerous barriers that impact their ability to secure adequate, accessible, safe, affordable, and community-based housing. These systemic issues include:⁵

1. *Limited Market Supply of Accessible Housing*
2. *Affordability*
3. *Income Restrictions*
4. *Discrimination*
5. *Lack of Support Services*
6. *Complex Application Processes*
7. *Geographic Disparities*
8. *Inadequate Legal Protections*

Among these, the most significant barriers are the limited supply of accessible housing, affordability, income restrictions, discrimination, and lack of support services. These issues are often the primary reasons individuals with disabilities become homeless, institutionalized, or forced to live in other inadequate environments.⁶

In 2023, The Ability Center of Greater Toledo presented testimony before the Senate Select Committee on Housing, highlighting alarming statistics related to the accessible housing crisis and proposing viable solutions. Despite the detailed report containing 23 recommendations for Ohio, it regrettably overlooked the critical need for more accessible housing options and new development of home and community-based housing for people with disabilities who need to live with supports. **This oversight is significant, as it perpetuates the ongoing crisis of accessible, affordable, and community-based housing for people with disabilities in Ohio and underscores the urgent need for agency support.** Without actionable recommendations leading to real solutions, Ohioans with disabilities will continue to face substantial barriers to securing housing that meets their diverse needs.

II. OHFA's Equity Focus: The Ability Center urges OHFA to ensure that disability is a class incorporated into every equity priority.

While the remainder of this document gives comments on OHFA's specific priorities for developing housing, The Ability Center would first urge OHFA to ensure that disability is a class incorporated into every aspect of their equity priorities. OHFA has laid out equity as a high priority for it this year. The OHFA Executive Director letter sets out OHFA's equity priority; ^[OBJ] OHFA lays out (race, religion, national origin, sex, disability, or familial status). a Housing Equity Statement; and OHFA incorporates a "Housing Equity Focus" throughout its Strategic Priorities.

⁴ *People with disabilities living in the US face urgent barriers to housing*. Urban Institute. (2022a, October 21). <https://www.urban.org/research/publication/people-disabilities-living-us-face-urgent-barriers-housing>

⁵ *People with disabilities living in the US face urgent barriers to housing*. Urban Institute. (2022, October 21). <https://www.urban.org/research/publication/people-disabilities-living-us-face-urgent-barriers-housing>

⁶ *People with disabilities living in the U.S. face urgent ...* (n.d.-d). [https://www.urban.org/sites/default/files/2022-10/People with Disabilities Living in the US Face Urgent Barriers to Housing_0.pdf](https://www.urban.org/sites/default/files/2022-10/People%20with%20Disabilities%20Living%20in%20the%20US%20Face%20Urgent%20Barriers%20to%20Housing_0.pdf)

The Ability Center applauds OHFA for placing housing equity front and center in its priorities across classes identified as having a history of discrimination under the Fair Housing Act (race, religion, national origin, sex, disability, or familial status).⁷

However, within the strategic “Housing Equity Focus” sections, disability is only mentioned once in the mention of the 811 program.⁸ Presumably, disability is also covered by the encouragement of “fair housing practices” though that section is broader and does not mention classes specifically.⁹

Within many housing advocacy circles, which often focus on economic development and homelessness, organizations often miss remedying discrimination on the basis of disability as a priority. Yet, the U.S. Congress has recognized that a history unequal laws and policies have kept people with disabilities from education, employment, and housing and kept them living isolated and in poverty. The findings of the Americans with Disabilities Act states that “historically, society has tended to isolate and segregate individuals with disabilities, and despite some improvements, such forms of discrimination against individuals with disabilities continue to be a serious and pervasive social problem.”¹⁰

In recognition of this fact, the U.S. has passed four major civil rights laws that seek to eliminate discrimination against individuals with disabilities education, employment, housing, government, and places of public accommodation. Most relevant to this discussion, Congress amended the Fair Housing Act in 1988 to outlaw discrimination on the basis of disability in housing. While landlords may not place out signs prohibiting people with disabilities from applying, we still, today, hear from landlords do not want to rent to a person because of their disability. As OHFA itself has recognized, about half of housing discrimination cases filed in Ohio were primarily based on disability discrimination.¹¹ However, the pervasive nature of U.S. laws and policies that discriminate against people with disabilities in every aspect of our society have also kept people with disabilities from economic self- sufficiency and independence.

Thus, we urge OHFA to ensure that every equity focus area ensures that “equity” means equity for individuals with disabilities as well as for all suspect classes identified in the Fair Housing Act.

III. Key Opportunities

⁷ 42 U.S.C. 3601, *et seq.*

⁸ *Id.* at 19-22.

⁹ *Id.* at 23.

¹⁰ 41 U.S.C. 12101(a)(2).

¹¹ Devin Keithley, Ohio Housing Finance Agency, “Fair Housing Discrimination in Ohio,” (April 14, 2021), available at <https://ohiohome.org/news/blog/april-2021/fairhousing.aspx#:~:text=In%202020%20the%20U.S.%20Department,the%20basis%20of%20disability%20discrimination.> (accessed 5/23/2024).

a. Single Family

In support of the OFHA’s 2024-2025 annual plan, we request that "key opportunity" #1 be expanded to include the goal of "increasing the supply of affordable and accessible single-family housing for potential Ohio homebuyers." Additionally, for every “Key Opportunity” in this area, single family housing should be accessible to those with disabilities.

Modular homes, constructed using advanced building systems, are built in a factory to about 80% completion before being transported to the final site for finishing touches.¹² Homebuyers can fully customize these homes to meet their specific needs, including making them fully accessible.¹³ According to Impresa Modular, a leading manufacturer of modular homes in America, "accessible modular homes offer a great solution to needed disability housing accommodations." This company allows clients to design rooms with features and functions that support diverse disability needs, ensuring homes are tailored to individual requirements.¹⁴

The OFHA has recognized this cost-effective single-family housing development model as a promising variable in the solution to Ohio's affordable housing crisis. Additionally, modular homes have significant potential to increase the supply of accessible housing. The affordable housing crisis is inherently linked to the accessible housing crisis; both must be addressed simultaneously to prevent Ohioans with disabilities from facing severe barriers to securing suitable housing. Without comprehensive solutions, individuals with disabilities are at risk of isolation, deteriorating health, institutionalization, or homelessness.

b. Multi Family

In support of the OFHA’s 2024-2025 annual plan, we urge OFHA to implement a requirement that new multifamily complexes built with LIHTC and OLIHTC funding include additional accessible units beyond the percentages in Section 504 of the Rehabilitation Act.

The Ability Center applauds OHFA’s consistent incorporation of accessible design and features into the housing developed with OHFA Tax Credits. However, we urge OHFA to require more than 5% of accessible units be mobility accessible. Instead, we urge OHFA to increase the percentage of accessible mobility units to 8%.

The Low-income Housing Tax Credit (LIHTC) program gives State and local LIHTC-allocating agencies the equivalent of approximately \$10 billion in annual budget authority to issue tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income individuals.

¹² *Manufactured or modular home - what's the difference?* Next Modular. (2023, January 25). <https://www.nextmodular.com/modular-manufactured-prefabricated-home/>

¹³ *Manufactured or modular home - what's the difference?* Next Modular. (2023, January 25). <https://www.nextmodular.com/modular-manufactured-prefabricated-home/>

¹⁴ *Accessible Modular Homes from Express Modular*. Impresa Modular. (2016, February 15). <https://impresamodular.com/accessible-modular-homes/#:~:text=Accessible%20Modular%20Homes%20Offer%20a,and%20functions%20that%20you%20need.>

In 2022, around 20.4% of persons with a disability in the United States were living below the federal poverty line.¹⁵ In Ohio, the number of people with disabilities who are of low or fixed income is 30%, higher than the national average by almost 10%.¹⁶ Though the LIHTC coupled with the Ohio Low-Income Housing Tax Credit Program (OLIHTC) will allow for the funding of hundreds of additional multifamily units in Ohio, this alone will not provide access to housing for people with disabilities who make up a majority of the population living beneath the poverty line. Without an increase in accessible units, people with disabilities will continue to face inadequate living environments that threaten risks of homelessness and institutionalization.

In support of the OFHA’s 2024-2025 annual plan, we ask the OFHA to include in “Key Opportunity” #7, “advancement of livability and accessibility standards.”

Accessible housing is critical to the wellbeing of people with disabilities because it provides health and social benefits whereas inaccessible housing leads to risks of greater harm, isolation, and worse health outcomes.¹⁷ Although appropriate accessible housing enables independent living, research shows that people with disabilities often lack suitable housing, are more likely to experience an increased likelihood of living in unaffordable, insecure and/or poor quality housing and are at a higher risk of experiencing homelessness or institutionalization.¹⁸

“Aging in Place” is a recent movement that formed on the same principles of the Independent Living Movement of the 1960’s. The principles of in-home supportive services, home accessibility, long term care benefits, and community support. There are various definitions of “Aging in Place,” but they all mostly encompass these principles and refer to the phenomenon of older adults remaining in their homes and communities as they age, rather than relocating or moving into an institutional setting.¹⁹

Enhancing “livability standards” for people with disabilities and those in the aging population inherently include enhancing some accessibility recommendations. However, it is important that the OFHA specifically state in their “Key Opportunity” section how livability enhancements will include robust enhancements for accessibility standards so that these populations of individuals can and will benefit from OFHA funded developments.

¹⁵ Published by Statista Research Department, & 3, N. (2023, November 3). *Persons with disability below the poverty line U.S. 2022*. Statista. <https://www.statista.com/statistics/1225870/us-disability-below-poverty-line/#:~:text=In%202022%2C%20around%2020.4%20percent,percent%20of%20the%20poverty%20level.>

¹⁶ Ohio. (n.d.-c). <https://dam.assets.ohio.gov/image/upload/medicaid.ohio.gov/Resources/Publications/Forms/ODM10113fillx.pdf>

¹⁷ Lindsay, S., Fuentes, K., Rangunathan, S., Li, Y., & Ross, T. (2024, January 25). *Accessible independent housing for people with disabilities: A scoping review of promising practices, policies and interventions*. PloS one. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10810508/#:~:text=Accessible%20housing%20is%20critical%20to,people%20with%20disabilities%20%5B12%5D.>

¹⁸ Lindsay, S., Fuentes, K., Rangunathan, S., Li, Y., & Ross, T. (2024, January 25). *Accessible independent housing for people with disabilities: A scoping review of promising practices, policies and interventions*. PloS one. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10810508/#:~:text=Accessible%20housing%20is%20critical%20to,people%20with%20disabilities%20%5B12%5D.>

¹⁹ *Overview of aging in place – rhibub aging in place toolkit.* – RHHub Aging in Place Toolkit. (n.d.). <https://www.ruralhealthinfo.org/toolkits/aging/1/overview>

IV. Key Challenges

a. Single Family

To enhance the OFHA’s 2024-2025 annual plan draft, we recommend specifying the distinction between low to moderate income and fixed income within the “key challenge” section that addresses the short supply of accessible and affordable housing options. This differentiation will help in better understanding and addressing the diverse needs of people with disabilities.

Individuals with disabilities may be of low to moderate income, but they are more likely to be on a *fixed* income due to limitations set forth by benefits they receive. In Ohio, the average monthly benefit from Social Security Disability Insurance is \$1,422.89.²⁰ In addition, in Ohio the average amount a homeowner pays on their mortgage is \$1,023.²¹ These numbers are staggering but reflect the reality. A person with a disability relying solely on SSDI income cannot qualify for a single-family home. Even if they did, they would have just over \$400 left after paying the monthly mortgage, making it incredibly difficult or impossible to sustain homeownership on a fixed income in Ohio. Therefore, we urge the OFHA to include “fixed income” as a category in their analysis, as it presents unique challenges to homeownership in Ohio distinct from those faced by individuals with low to moderate incomes.

In support of the OFHA’s 2024-2025 annual plan draft, we urge OFHA to include people with disabilities as a population affected by discriminatory practices that result in significant gaps concerning access to homeownership, quality education, and employment.

According to the Ohio Department of Development, in 2021 statistics demonstrated that there were more than 30,000 housing discrimination complaints filled annually.²² More than fifty percent of those complaints alleged discrimination based on disabilities.²³

Although people with disabilities come from all national origins and ethnicities, failing to specifically address and identify the disparities between people with and without disabilities will lead OFHA to overlook or mischaracterize crucial data on disability-related discriminatory practices. These practices are significant contributors to the systemic barriers that marginalized communities face in achieving homeownership.

Therefore, it is essential for the OFHA to address the specific disparities faced by people with disabilities in their 2024-2025 annual plan. By highlighting and accurately identifying disability-

²⁰ Vandiver, W. (2024, February 29). *How much does disability pay in 2023 and 2024?*. NerdWallet. <https://www.nerdwallet.com/article/investing/social-security/how-much-does-disability-pay>

²¹ Writers, S. (2024, January 18). *Ohio Mortgage Calculator: Estimate your monthly payment*. MoneyGeek.com. <https://www.moneygeek.com/mortgage/ohio/calculator/>

²² Know your rights: A summary of fair housing laws. (n.d.-b).

<https://dam.assets.ohio.gov/image/upload/development.ohio.gov/individual/energyassistance/20240304-Know-Your-Rights-Fair-Housing.pdf>

²³ Know your rights: A summary of fair housing laws. (n.d.-b).

<https://dam.assets.ohio.gov/image/upload/development.ohio.gov/individual/energyassistance/20240304-Know-Your-Rights-Fair-Housing.pdf>

related discrimination in housing, OFHA can better tackle the systemic barriers that hinder marginalized communities from achieving homeownership. Recognizing and addressing these challenges will ensure more equitable and inclusive housing options and policies for all of Ohio's community members.

b. Multi Family

To improve the 2024-2025 annual plan draft, we request that the OFHA acknowledge and address the insufficient percentage of required accessible units in subsidized housing. This shortfall fails to meet the housing needs of the disability population adequately and significantly contributes to barriers that limit access to accessible and affordable housing for Ohioans with disabilities.

Subsidized multifamily complexes are legally required to have 2% of their units accessible to individuals who are blind or deaf, and 5% accessible to those with mobility disabilities.²⁴ . In a complex with 100 units or fewer, this translates to just one unit for people with mobility disabilities and one for those who are blind or deaf. Meanwhile, Ohio's population of people with disabilities is estimated to be between 28% and 36%.²⁵ The disparity between the number of required accessible units and the growing demand for such housing is stark. Since the passing of the ADA, the demand for accessible housing has increased due to economic shifts and deinstitutionalization practices that support independence for people with disabilities. However, true independence cannot be achieved without addressing the foundational social determinant of health: housing. Therefore, it is crucial to increase the required number of accessible units in subsidized multifamily housing to meet the rising needs of the disability community.

In support of the OFHA's 2024-2025 annual plan draft, we ask the OFHA to expand their definition from "persons with illness or developmental disabilities," to "persons with illness and people with mobility, developmental, intellectual, sensory, or mental health disabilities."

The term "Persons with illness or developmental disabilities" is inadequate. Many different types of disabilities create various barriers to accessing affordable and accessible multifamily units. People with mobility disabilities, for instance, face different challenges than those with developmental disabilities. Therefore, it is important to use language that is both inclusive and respectful.

The word "illness" is too vague and can be interpreted in various ways. While "persons with illness" is technically accurate, it does not distinguish between physical illness and mental health disabilities. To represent individuals with psychiatric disabilities more accurately, the

²⁴ *Ada requirements for apartment buildings*. ADA Solutions - Tactile Warning Surfaces. (2023, October 17). <https://adatile.com/ada-requirements-for-apartment-buildings/#:~:text=ADA%20Apartment%20Requirements&text=Those%20built%20later%20must%20have,units%20must%20be%20fully%20accessible>.

²⁵ Centers for Disease Control and Prevention. (2023, May 12). *Disability & Health U.S. State Profile Data: Ohio*. Centers for Disease Control and Prevention. <https://www.cdc.gov/ncbddd/disabilityandhealth/impacts/ohio.html>

OFHA should use the term “mental health disability” alongside “persons with illness.” This distinction is crucial for understanding and addressing the diverse challenges faced by different populations of people with disabilities in accessing housing.

V. Priority Recommendations

a. Single Family

In support of the OFHA’s 2024-2025 annual plan, we ask OFHA to include the distinction between low to moderate income Ohioans and those on a *fixed* income in priority recommendation #1.1.

Individuals with disabilities may be of low to moderate income, but they are more likely to be on a *fixed* income due to limitations set forth by benefits they receive. In Ohio, the average monthly benefit from Social Security Disability Insurance is \$1,422.89.²⁶ In addition, in Ohio the average amount a homeowner pays on their mortgage is \$1,023.²⁷ These numbers are staggering but reflect reality. A person with a disability relying solely on SSDI income cannot qualify for a single-family home. Even if they did, they would have just over \$400 left after paying the monthly mortgage, making it incredibly difficult or impossible to sustain homeownership on a fixed income in Ohio. Therefore, we urge the OFHA to include “fixed income” as a category in their analysis, as it presents unique challenges to homeownership in Ohio distinct from those faced by individuals with low to moderate incomes.

In support of the OFHA’s 2024-2025 annual plan, we would like to commend OFHA on their inclusion of initiative 1.5 in their 2024-2025 annual plan, which aims to boost the availability of accessible and affordable housing for homeownership by constructing new single-family homes for low to moderate income homebuyers. In addition, we urge OFHA to consider a minor amendment to this recommendation by incorporating “fixed income.”

People with disabilities in Ohio face significant challenges in becoming homeowners due to the longstanding shortage of accessible and affordable housing. This crisis has persisted for a long time but is now more evident as increasing numbers of people with disabilities choose and desire to live independently in the community. By adding this as a priority recommendation, OFHA is acknowledging its commitment to the disability community by not only identifying the shortage as a crisis, but also by advocating for solutions in their recommendations. **Our only request is that OFHA also include the distinction between *Fixed* income and low to moderate income in the priority recommendation #1.5 as requested among other recommendations in previous sections.**

²⁶ Vandiver, W. (2024, February 29). *How much does disability pay in 2023 and 2024?*. NerdWallet. <https://www.nerdwallet.com/article/investing/social-security/how-much-does-disability-pay>

²⁷ Writers, S. (2024, January 18). *Ohio Mortgage Calculator: Estimate your monthly payment*. MoneyGeek.com. <https://www.moneygeek.com/mortgage/ohio/calculator/>

In support of OFHA's 2024-2025 annual plan, we ask OFHA to include the mention of accessible homes in priority recommendation #1.7.

Priority Recommendation #1.7 states: Work towards the creation of a Housing Impact and Innovation Fund that helps to support pilot programs that increase the supply of affordable homes for purchased by socially disadvantaged homebuyers.

People with disabilities would count as "socially disadvantaged" homebuyers, but with a program that only increases access to affordable housing, people with disabilities will still be unable to find housing that fits their needs. Therefore, OFHA needs to add to the priority recommendation "accessible and affordable homes" so Ohioans with disabilities can have fair and equal access to take advantage of such a program.

b. Multifamily

In support of OFHA's 2024-2025 annual plan, we ask OFHA to include in priority recommendation #2.6 the distinction between "extremely low income" and "fixed" income.

One of the major financial barriers for people with disabilities is a result of the limit on how much income one can earn before losing disability benefits.²⁸ In addition, many individuals with disabilities on a fixed income receive a set amount of benefits each month that rarely ever increases in value and has little or no inflation protection. Limited or no inflation protection means if prices of goods and commodities increase because inflation increases, it "eats" into the gains of fixed-income securities.²⁹

This scenario is especially problematic in our economy today, as prices of homes and rental properties have skyrocketed. According to *Rent Report Lists*, the average rent price of a one bathroom/one bedroom apartment in Columbus, Ohio is \$1,130 a month.³⁰ In Ohio, the average amount of income a person with a disability receives from Social Security Disability Insurance is around \$1,422.89 a month.³¹ This means that by earning this income alone, people with disabilities who intend to rent in Columbus, Ohio are already priced out of the market before even investigating what is available.

The current limitations on income thresholds for disability benefits exacerbate the challenges these individuals encounter, particularly concerning housing affordability. With many relying on fixed incomes that offer minimal or no inflation protection, the soaring costs of housing pose a formidable obstacle to accessing suitable accommodations. By prioritizing the distinction between "extremely low income" and "fixed" income within its recommendations, OFHA can

²⁸ Devendorf, John. "A Guide to Investing with Limited Income." LawInfo, 4 May 2021, <https://www.lawinfo.com/resources/social-security-disability/a-guide-to-investing-with-limited-income.html>.

²⁹ "Fixed Income." Investopedia, <https://www.investopedia.com/terms/f/fixedincome.asp>. Accessed 21 May 2024.

³⁰ Columbus Among U.S. Cities with Highest Rent Increase Over Past Year, Report Says." NBC4 WCMH-TV, 14 Mar. 2024, <https://www.nbc4i.com/news/data-desk-ohio/columbus-among-u-s-cities-with-highest-rent-increase-over-past-year-report-says>. Accessed 21 May 2024.

³¹ Vandiver, W. (2024a, February 29). *How much does disability pay in 2023 and 2024?*. NerdWallet. <https://www.nerdwallet.com/article/investing/social-security/how-much-does-disability-pay>

take a significant step towards addressing this pressing issue. Providing tailored support and assistance to those on fixed incomes, particularly in regions with inflated housing costs, is essential for fostering inclusive and equitable housing opportunities. **Therefore, it is imperative that OFHA recognizes and responds to the unique financial challenges faced by individuals with disabilities, ensuring that their housing needs are not overlooked or marginalized within broader policy initiatives.**

VI. Operations

In support of OFHA’s 2024-2025 annual plan, we ask the OFHA to include in the “Operations” section an amendment to #3.6 that would include “approaches to increasing affordable and accessible housing.”

In OFHA’s 2024-2025 annual plan draft section denoted “Priority Recommendations—single family,” OFHA included a new recommendation that would: “Increase the supply of accessible and affordable housing for homeownership through the development of new single-family homes for low-to moderate income homebuyers.” This recommendation must be backed up by an operation which would act as the mechanism for accomplishing it.

As stated previously, the affordable housing crisis is also an accessible housing crisis, as a significant population of people with low or fixed incomes are people with disabilities in Ohio.³² The OFHA must recognize that addressing both affordability and accessibility simultaneously is crucial to resolving the housing crisis. To enhance OFHA’s recommendation to increase affordable and accessible single-family homes, we urge the agency to explicitly integrate accessibility into their operational plans.

VII. Conclusion

The Ability Center of Greater Toledo appreciates the opportunity to provide input on the OFHA’s FY2024-2025 annual plan draft. Addressing the severe affordable housing crisis necessitates a dual focus on both affordability and accessibility. People with disabilities face unique and significant barriers that require targeted solutions. Therefore, we urge the OFHA to incorporate our recommendations, specifically to

- **Increase Accessible Housing Supply:** Ensure the inclusion of accessible homes in new single-family and multifamily developments to meet the diverse needs of Ohioans with disabilities.

³² Centers for Disease Control and Prevention. (2023a, May 12). *Disability & Health U.S. State Profile Data: Ohio*. Centers for Disease Control and Prevention. <https://www.cdc.gov/ncbddd/disabilityandhealth/impacts/ohio.html>

- **Consider Fixed Incomes:** Recognize distinct challenges faced by individuals on fixed incomes, particularly in regions with high housing costs, and adjust policies accordingly.
- **Enhance livability and Accessibility Standards:** Explicitly state how livability enhancements will include robust accessibility standards to benefit both the people with disabilities and the aging population.
- **Address Discriminatory Practices:** Identify and address disparities in housing access for people with disabilities to ensure equitable opportunities for homeownership.
- **Ensure that OHFA's focus on Equity Includes Disability:** People with disabilities have been historically discriminated against, resulting in low levels of education, income, and employment. This discrimination has specifically included housing discrimination where accessible, community-based housing and homeownership has traditionally been unavailable to individuals with disabilities.

By implementing these strategies, the OFHA can make significant strides towards creating inclusive, affordable, and accessible housing options for all Ohioans, promoting independence and quality of life for individuals with disabilities.

If any questions or concerns arise, please do not hesitate to contact: sfish@abilitycenter.org

Sincerely,

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