

February 14, 2022

Housing Stability Fund Oversight Board
PO Box 330338
San Francisco, CA 94133
Email: Shanti.Singh@sfgov.org

RE: **Equitable access to affordable housing for seniors and people with disabilities**

Dear Chair Singh and Board Members:

Our organizations represent and serve low-income seniors and people with disabilities across San Francisco. We present this proposal to urge the Board to recommend support for programs and projects that begin to break down the barriers that prevent too many seniors and people with disabilities from finding decent, accessible, and affordable housing in this City now and in the future.

Proposal summary: Today, thousands of seniors and people with disabilities survive in substandard and precarious housing. A vast majority are on fixed incomes and are unable to afford market rate rents. Those who have been in rent-controlled units for many years are especially a prime target for real estate speculators. Displacement whether because of unstable existing housing, rising unaffordable rents, or evictions is resulting in growing numbers of housing insecure or homeless seniors.¹

Despite these urgent needs the today's City's affordable housing system excludes most seniors and people with disabilities from the housing they need. Even as hundreds of senior and accessible units are being built, most vulnerable seniors and people with disabilities are unable to qualify for those units because program rules determine these low income tenants make *too little* income.

Given this acute unmet need, San Francisco's existing affordable housing system must be changed. The Housing Stability Fund can advance that change by: (a) supporting the expansion of the Senior Operating Subsidy (SOS) in this coming Fiscal Year to additional senior housing projects and to expand the program to make accessible units affordable for people with disabilities; and (b) supporting the acquisition of sites for the development of new social housing that is truly affordable for all people including seniors and people with disabilities.

Project goals/Advancing racial, social and geographic equity: This proposal seeks to address and correct fundamental biases embedded in the City's own housing system that result in disqualifying some of the poorest tenants that are disproportionately people of color.²

With the exception of federally subsidized housing developments or HSH supported housing units, rents in City's affordable housing programs are set based upon a set of income categories associated with the median

¹ According to the Department of Homelessness and Supportive Housing, persons over 65 is the fastest growing homeless population. Presentation by HSH at the Board of Supervisors' Public Safety and Neighborhood Services Committee, January 27, 2022.

² Department of Aging and Disability Services (formerly DAAS), [Assessment of the Needs of San Francisco Seniors and Adults with Disabilities](#), (2017), p.15.

incomes of the general population. For a majority of the City’s senior and accessible units the *lowest* rents are designed to be affordable for households earning 50% of the area’s median income (AMI). But the *median* incomes for San Francisco’s tenants who are seniors or persons with disabilities are substantially *below* 50% AMI. The consequence is that a most seniors and persons with disabilities cannot meet the minimum income requirements³ to apply for the City’s affordable housing.

50% AMI monthly income for all persons living alone in the metro area	Rent charged for all 50% AMI studios (including senior and accessible units)	Minimum monthly income required to qualify for a 50% AMI studio	Median monthly income of a SF senior living alone ⁴	Median monthly income of San Franciscan with disabilities living alone
\$3887	\$1166	\$2332	\$2246	\$1143

By failing to set affordable rents based upon the actual median incomes of seniors and persons with disabilities, the City in effect excludes a majority of each population from senior and accessible units.

Breaking down the barriers to senior and accessible housing: In order to lower the barriers to senior and accessible housing, the Housing Stability Fund should commit to extending the thus far successful Senior Operating Subsidy (SOS) to future permanently affordable senior housing and accessible housing in non-senior housing.

The SOS program was authored in 2019 by President Norman Yee with the support of senior and disability rights organizations. SOS transforms 50% AMI housing affordable for extremely low income seniors by creating additional tiers of rents at 15% AMI and 25% AMI levels in designated senior housing developments in the pipeline.⁵ In its first year, SOS changed a new 94 unit 50% AMI senior housing development in the Mission District into housing accessible to both extremely low-income and very low income seniors by lowering rents for 40 units to 15 and 25% AMI levels.

SOS was adopted with the community’s expectation that it would be integrated into all future affordable senior housing. However, MOHCD reports it only plans to expand the program by a total of 150 senior units housing spread over the next five years, only 16% of the 925 senior units in MOHCD’s pipeline.⁶ Such a target falls far short of providing proportional access for the seniors who need SOS. Equity should require that SOS or equivalent programs make at least half of new senior units accessible to the majority of senior tenants whose incomes fall below 50% AMI.

At present there is no comparable SOS program for extremely low-income people with disabilities who are not seniors. Thus even if building codes require a designing and constructing a percentage of units physically accessible to persons with disabilities, it is impossible for many people with mobility disabilities to even apply

³ Typically the minimum income to apply for affordable housing is 200% the rent that is charged.
⁴ Department of Aging and Disability Services, [2021 Overview Report on Affordable Housing for Seniors and People with Disabilities](#). (SFDAS Overview Report), p. 7. Compounding the barriers, median tenant incomes are substantially lower than the median income of all seniors.
⁵ Affordable rents are adjusted annually. For the SF area as of March 2021, 15% AMI rent for a studio is \$350; 25% AMI rent is \$583.
⁶ SFDAS Overview Report, p. 17.

for those accessible units because they have extremely low incomes such as SSI (monthly benefit is \$1040). Because of the lack of such a program the paradoxical result is that newly built fully accessible units are frequently assigned to non-disabled tenants. Equity and fairness should compel our City to adopt and fund an equivalent SOS program for people with disabilities to be able to access accessible units with rents affordable for tenants with incomes at 15% and 25% AMI levels.

We therefore urge the Housing Stability Fund Board to establish as a principle that all social housing programs provide equitable access for extremely low-income seniors and people of disabilities. Putting that principle into practice in FY2022-23 we urge the Board to recommend that the City fully fund SOS subsidies for senior housing and to extend SOS to people with disabilities applying for accessible housing in non-senior buildings. With several hundred new senior and accessible units expected to open for service next year, now is the time to start making San Francisco's housing developments accessible to all income levels.⁷

We need more sites to build senior housing in all neighborhoods that need such housing:

As San Francisco's population ages the need for more senior housing will grow. SFDAS has predicted the senior population may reach 30 % of the total population by 2030. And there are already high concentrations of existing vulnerable senior tenants in many neighborhoods where the City has disproportionately few senior housing in the present housing pipeline.

When the City departments have been asked where new senior housing may be located beyond the present pipeline, officials have responded that new developments are dependent upon where there is surplus public land or where land is made available by development agreements.⁸ In other words there is no (or very limited) present City capacity to intentionally locate new senior housing to achieve geographic equity or to address existing unmet need.

Therefore, in order to equitably increase the supply of affordable senior housing the City must secure and acquire more properties to develop where we need the sites. Given the absence of any federal, state, or local program to acquire sites for senior housing, the Housing Stability Fund can and should support the creation of such a program.

Building toward equity in FY2022-23 and beyond

The path towards a more equitable affordable housing system will be a long one. Certainly we will not accomplish all our goals in FY2022-23. But unless our City and the HSF builds concrete steps forward into this coming budget year we will lose ground. Housing units coming on-line next year will become further socially segregated and sites without action this year. And failure to fund a social housing acquisition program now will certainly mean permanent loss of sites to unaffordable market rate development. As we noted above, the new SOS program in its first year demonstrated meaningful change is possible in a single fiscal year. The time to act is now.

⁷ With respects to all our proposals for affordable housing we only intend them to apply to 'social housing' within the definition of the Housing Stability Fund ordinance definition, i.e., permanently affordable housing owned by the City, a nonprofit, etc.

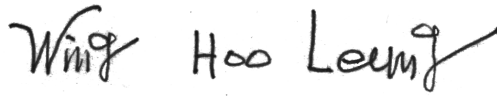
⁸ E.g., Testimony by MOHCD at Neighborhood Services Committee, January 27, 2022.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anni Chung", with a long, sweeping horizontal stroke extending to the right.

Anni Chung
President and CEO
Self Help for the Elderly

Jessica Lehman
Executive Director
Senior and Disability Action

A handwritten signature in black ink, appearing to read "Wing Hoo Leung", with a long, sweeping horizontal stroke extending to the right.

Wing Hoo Leung
President
Community Tenants Association