



# PARK CITY COMMUNITIES DISABILITY NEEDS ASSESSMENT



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## EXECUTIVE SUMMARY

Section 504 of the Rehabilitation Act of 1973 generally requires that 5% of housing units be made accessible for persons with mobility impairments, and that an additional 2% of units be accessible for persons with hearing or vision impairments. See 24 CFR §§ 8.22, 8.23. The purpose of this Needs Assessment is to determine if those percentages adequately meet the need of persons with disabilities within the City of Bridgeport and among those who participate in Park City Communities' housing programs, and to understand the demographic characters of those households. The Needs Assessment is not intended to collect information about *all* disabilities that household members may have, but only those disabilities involving mobility, hearing, and visual impairments that require accessible housing features covered by Section 504.

This study examines the housing needs of people with disabilities in the City of Bridgeport and its Housing Authority. It was undertaken by Gisela Vazquez, Disability Rights Coordinator on behalf of the Housing Authority City of Bridgeport d/b/a Park City Communities.

The aim of the study is to better understand how to meet the housing needs of people with physical disabilities, to better understand the means by which appropriate housing for disabled people can be delivered, and to obtain an evidence base to support the development of plans and strategies concerned with housing for disabled people in the community.

The methodology for the project is comprised of the following elements:

- A literature review of local research data, statistics, and existing demographic data.
- A survey instrument administered to participants, residents and applicants of Low-Income Public Housing and Housing Choice Voucher Programs.

The availability of accessible housing is critical to enable people with disabilities to live independent lives with a minimal amount of support. It is also essential to enable people with disabilities to participate in society by visiting the homes of friends and family. Housing that meets the needs of people with disabilities is increasingly important for the community as the population ages.

This report details Park City Communities Needs Assessment and recommendations prepared in accordance with 24 C.F.R. 8.25.

## Findings: Collection of Existing Demographic Data

1. **Within the City of Bridgeport, how many people have mobility, hearing, or visual impairments and need a housing unit with accessible features, and what are the characteristics of that population (such as age, household size, and household composition)?**

As shown in **Table 1**, in the City of Bridgeport, disabilities counted in this data include impairments associated with aging such as difficulties with vision, hearing, and self-care. The table also explains how many individuals have disabilities by category and age groups.

### Characteristics of the Disabled Population- City of Bridgeport

#### **A. Table 1- Persons with Disabilities - City of Bridgeport**

City of Bridgeport- Persons with Disabilities Characteristics						
Disability Type	Total	Under 18	18 to 34	35 to 64	65 and over	Percentage of the Population with Disabilities
Total civilian noninstitutionalized population	25,570	2,321	4,552	9,154	9,543	17.9%
With a Hearing Difficulty	5,437	472	701	1,685	2,579	3.8%
With a Vision Difficulty	4,814	398	459	1,636	2,321	3.4%
With a Cognitive Difficulty	13,702	1,733	2,796	5,060	4,113	10.4%
With an Ambulatory Difficulty	14,390	312	622	5,721	7,735	10.9%
With a Self-Care Difficulty	5,531	389	413	1,643	3,086	4.2%
With Independent Living Difficulty	11,650	N/A	1,770	4,028	5,852	10.9%

Source: U.S. Census Bureau- American Community Survey 2019

For this assessment, it is important to define each category of the disabilities listed in Table 1.

1. Hearing Impairment: Deafness or impaired ability to hear warning signals or communicate.
2. Vision Impairment: Blindness or impaired visual ability to perceive signals or dangerous situations.
3. Cognitive Disability: Limitations in mental functioning and in skills such as communication, self-help, and social skills.

4. Ambulatory Disability: Physical and permanent disability to such a degree that the person is unable to move from place to place without the aid of a wheelchair.
5. Self-Care Disability: A person with a physical, mental, or emotional condition lasting six months or more, who has difficulty in doing any of the activities such as getting dressed, bathing or getting around inside the home.
6. Independent Living Disability: A person with a physical, mental or emotional condition who has difficulty with basic daily living skills like personal hygiene, dressing and clothing care, health care, eating, cooking and nutrition, home management and home safety, financial management, personal growth, awareness and problem solving. These individuals may require assistance with even the most basic life skills.

**B. Table 2- Race of Residents- City of Bridgeport**

City of Bridgeport- Characteristics of Disabled Population		
RACE/ETHNICITY	With a Disability	Percent with a Disability
White alone	10,201	18.1%
Black or African American alone	9,157	19.3%
Asian alone	1,458	23.7%
Native Hawaiian and Other Pacific Islander alone	N/A	N/A
American Indian and Native Alaskan alone	N/A	N/A
Some other race alone	3,300	12.2%
Two or more races	1,454	26.1%
White alone, Not Hispanic or Latino	4,901	17.9%
Hispanic or Latino (of any race)	9,992	16.2%

Source: U.S. Census Bureau- American Community Survey 2019

### C. Table 3- Household Types- City of Bridgeport

HOUSEHOLDS BY TYPE	
Total households	50,103
Average household size	3
Average family size	4
RELATIONSHIP	
Population in households	140,095
Householder	35.8%
Spouse	10.9%
Unmarried partner	3.6%
Child	34.1%
Other relatives	11.0%
Other nonrelatives	4.7%
DISABILITY STATUS OF THE CIVILIAN NONINSTITUTIONALIZED POPULATION	
Total Civilian Noninstitutionalized Population	142,580
With a disability	17.9%
Under 18 years	35,306
With a disability	6.6%
18 to 64 years	89,957
With a disability	15.2%
65 years and over	17,317
With a disability	55.1%

Source: U.S. Census Bureau- American Community Survey 2019

Individuals with disabilities often require additional housing specifications or modifications to accommodate their disability. Due to these additional housing requirements, it can be exceedingly difficult for those with disabilities to find suitable housing, especially if they are low-income and/or looking for rental housing. Furthermore, providing housing that addresses the needs of individuals with disabilities can be difficult as the term “disability” encompasses a broad spectrum of disability types and socioeconomic situations that generate a correspondingly large variety of unique housing needs. Despite the broad-brush nature of the term, identifying persons in the city with disabilities is an important component to understand their housing needs. Identifying where the need is greatest can inform decisions about where to prioritize efforts going forward.

Citywide, approximately 17.9% of the population has at least one type of disability according to the 2019 American Community Survey. A closer look at the citywide numbers reveals that disabilities are more prevalent among older age groups. For example, just 6.6% of the city population aged 18 years and under has a disability whereas 55.1% of aged 65 years and over

has a disability. This is an expected phenomenon, as the disabilities counted in the data include impairments associated with aging such as difficulties with vision, hearing, and self-care. Among the younger age cohorts, a cognitive disability is the most common type of disability. An estimated 12.7% of the city population under the age of 18 has a cognitive disability.

**2. Among PCC's Low Income Public Housing residents, Housing Choice Voucher participants, and applicants on the waitlists for both programs, how many people have mobility, hearing, or visual impairments and need a housing unit with accessible features, and what are the characteristics of that population (such as age, household size, and household composition)?**

Park Cities Communities (PCC) is the local public housing authority in the City of Bridgeport. PCC's mission is to provide quality housing of choice, empower residents to their highest level of self-sufficiency, and form public and private partnerships to help revitalize the neighborhood. PCC administers Public Housing and the Housing Choice Vouchers (HCV) program in the city. There are currently over 2,300 families in public housing managed by PCC and over 3,000 participants of the HCV program, also called Section 8.

Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Public housing comes in all types and sizes from scattered single-family homes to high-rise apartment developments for elderly families.

The US Department of Housing and Urban Development (HUD) administers Federal aid to PCC to manage public housing for low-income families at affordable rates.

The Housing Choice Voucher Program (HCV) provides "tenant-based" rental assistance for assisting low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. A housing subsidy is paid to the landlord/management directly by the housing authority on behalf of the participating voucher holder family, then the family pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. HCV also authorizes a variety of "project-based" rental assistance programs, under which the owner reserves some or all of the units in a building for low-income tenants. A tenant who leaves a subsidized project will lose access to the project-based subsidy.

The following tables represent the program activity and characteristics of the housing community served by PCC:

#### D. Table 4- Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of unit/vouchers in use	0	0	2221	1873	200	1673	8	0	0
<b>*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year and Nursing Home Transition</b>									

Source: PIC (PIH Information Center)

#### E. Table 5- Characteristics of Residents

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	14,773	14,381	12,022	14,193	9,113	0	0
Average length of stay	0	0	8	10	1	10	5	0	0
Average Household size	0	0	2	2	2	2	2	0	0
# of Elderly Program Participants (>62)	0	0	516	469	41	428	3	0	0
# of Disabled Families	0	0	759	787	58	729	5	0	0

Data Source: PIC (PIH Information Center)



**F. Table 6- Race of Residents**

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	1172	1137	119	1034	3	0	0
Black/African American	0	0	900	807	89	718	5	0	0
Asian	0	0	0	0	0	0	0	0	0
American Indian/Alaskan Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	21	0	0	0	0	0	0
<b>*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year and Nursing Home Transition</b>									

Data Source: PIC (PIH Information Center)

**G. Table 7- Ethnicity of Residents- Park City Communities**

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	1130	823	89	946	1	0	0
Not Hispanic	0	0	963	1137	119	806	7	0	0
<b>*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year and Nursing Home Transition</b>									

Data Source: PIC (PIH Information Center)

**H. Table 8- Housing Needs and Characteristics of Families on the Waiting List LIPH  
- Park City Communities**

Housing Needs of Families on the Waiting List LIPH		
Public Housing		
	# of families	% total of families
Waiting list total	507	0.0%
Extremely low income <=30% AMI	0	0.0%
Very low income (>30% but <=50% AMI)	59	11.6%
Low income (>50% but <80% AMI)	331	65.3%
Families with children	225	44.4%
Elderly families	151	29.8%
Families with Disabilities	187	36.9%
Race/Ethnicity (White)	315	62.1%
Race/ethnicity (Black)	181	35.7%
Race/Ethnicity (Hispanic)	279	55.0%
Race/Ethnicity (Asian/other)	10	2.0%
Characteristics by Bedroom Size (PH Only)		
1 BR	262	57.7%
2 BR	122	24.1%
3 BR	94	18.5%
4 BR	24	4.7%
5 BR	4	0.8%
5+ BR	1	0.2%

Source: Yardi Voyager- PCC Waitlist: LIPH

**I. Table 9- Housing Needs and Characteristics of Families on the Waiting List HCV  
- Park City Communities**

Housing Needs of Families on the Waiting List HCV		
Public Housing		
	# of families	% total of families
Waiting list total	2288	0.0%
Extremely low income <=30% AMI	0	0.0%
Very low income (>30% but <=50% AMI)	0	0.0%
Low income (>50% but <80% AMI)	24	1.1%
Families with children	1058	46.2%
Elderly families	7	0.3%
Families with Disabilities	221	9.7%
Race/Ethnicity (White)	734	32.1%
Race/ethnicity (Black)	634	27.7%
Race/Ethnicity (Hispanic)	886	38.7%
Race/Ethnicity (Asian/other)	40	1.8%
Characteristics by Bedroom Size (PH Only)		
1 BR	NA	0.0%
2 BR	NA	0.0%
3 BR	NA	0.0%
4 BR	NA	0.0%
5 BR	NA	0.0%
5+ BR	NA	0.0%

*Source: Yardi Voyager- PCC Waitlist: HCV*

**I. Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

As a PHA receiving federal funding by HUD, PCC is by law, obligated to protect the rights of persons with disabilities. PCC is compliant with federal and state laws that provide protection to persons with disabilities, including Section 504 of the Rehabilitation Act of 1973 and in particular, 24 CFR Part 8 implementing Section 504, and 24 CFR Part 100 implementing the Fair Housing Act. Further, PCC will make any reasonable

accommodation to its public housing apartments when it is necessary to allow for a person with any disability to live and enjoy housing through PCC. PCC will also make reasonable accommodations to its policies, programs, and services, when they are necessary to allow persons with a disability to enjoy, participate or have access to the housing authority's programs and services.

For public housing, PCC uses a point system and preference for its waiting list. For HCV the waiting list is purged approximately every three years by a mailing to all applicants to ensure that the waiting list remains current. The mailings ask for confirmation of continued interest in the HCV program.

Admissions preferences include persons with disabilities, however as of now both waiting lists are closed. As of 11/23/2020 the waiting list for each program was:

Public Housing: 507 with 187 individuals or families with a disability (36.9%)

HCV: 2288 (although only 1873 vouchers are currently in use) with 221 individuals or families with a disability (9.7%)

## **II. Most immediate needs of disabled residents of Public Housing and Housing Choice voucher holders:**

The most immediate needs for disabled public housing residents with respect to accessibility issues are for accessible units. The increasing number of elderly and even younger disabled persons create additional need for accessible units.

The most immediate needs for Housing Choice Voucher holders are reasonable accommodations for disabled families; an increased number of landlord participation in the program; increased number of accessible units; and an increased number of housing units in the areas with low poverty rates that are accessible.

## **III. How do these needs compare to the housing needs of the population at large?**

There is a much greater and ongoing need for accessible units and accessible features for residents in public housing than in the general population. Residents in public housing are more likely to be very low-income and therefore more severely cost burdened than the general population. The elderly may require housing accommodations due to the nature of elderly persons being more likely to be disabled than the general population. The elderly are also more likely to be living on fixed incomes, which means any change in housing costs affects affordability to them more than the general population.

Based on ACS 2019 data it is estimated that 25,570 people, or 17.9%, in Bridgeport has a disability. Unsurprisingly age is closely related to the presence of a disability. Over 37% of residents over the age of 65 report dealing with a disability while 36% of residents aged 35-64 years old do. It is likely that all or nearly all the approximately 9,543 residents over the age of 65 and most residents in the 35-64 years age bracket with a disability need housing assistance.

#### IV. Reasonable Accommodations

Fair Housing Act makes it unlawful to refuse to make reasonable accommodations in rules, policies, practices, or services if necessary, to afford a person with handicaps equal opportunity to use and enjoy a dwelling. A housing provider is not required to provide supportive services, e.g.: counselling, medical or social services that fall outside the scope of the services. But a housing provider is required to make modifications to enable a qualified applicant with handicaps to live in the housing.

The following tables represent the approved reasonable accommodation requests of the housing community served by PCC:

**J. Table 10- LIPH Reasonable Accommodation Waitlist Needs (Current Residents)- PCC**

<b>Housing Needs of Families on the LIPH Reasonable Accommodation Waitlist (Current Residents)</b>		
	<b># of families</b>	<b>% of families</b>
Total of RA requests on LIPH waitlist	208	N/A
Unit Transfers	208	100%
One level Unit	66	32.6%
Hearing Impaired Features	3	1.5%
Vision Impaired Features	1	0.5%
Handicap Ramp	8	3.9%
Accommodation for a Live-in-Attendant	16	7.9%
1 <sup>st</sup> Floor Bedroom & Bathroom	41	20.3%
Fully Accessible Apartment	8	3.9%
Grab Bars	42	20.7%
Extra Bedroom	64	31.6%
Other (ground level, 1 <sup>st</sup> floor, PTSD, Anxiety, ESA, etc.)	46	22.7%

*Source: PCC's LIPH Reasonable Accommodation Waitlist*

**K. Table 11- LIPH Reasonable Accommodation Waitlist Needs (Applicants)- PCC**

<b>Housing Needs of Families on the LIPH Reasonable Accommodation Waitlist (Applicants)</b>		
	# of families	% of families
Total of RA requests on LIPH Waitlist	110	N/A
One level Unit	42	38%
Hearing Impaired Features	0	0.0%
Vision Impaired Features	0	0.0%
Handicap Ramp	8	8%
Accommodation for a Live-in-Attendant	5	5%
1 <sup>st</sup> Floor Bedroom & Bathroom	22	20%
Fully Accessible Apartment	5	5%
Grab Bars	48	44%
Extra Bedroom	30	27%
Other (ground level, 1st floor, PTSD, Anxiety, ESA, etc.)	46	42%

Source: PCC's LIPH Reasonable Accommodation Waitlist

**L. Table 12- HCV Reasonable Accommodations list (Current Participants)- PCC**

<b>Housing Needs of Families on the HCV Reasonable Accommodation list (Current Participants)</b>		
	# of families	% of families
Total of RA requests for HCV Program	30	N/A
Extra Bedroom	20	67%
Higher Rent	0	0%
Reinstatement on Waiting List	0	0%
Rent Unit from a Relative	0	0%
Assistance finding Accessible Unit	1	0.3%
Accommodation for a Live-in-Attendant	7	23%
Request to Move Within Initial 12 Months Lease	2	7%
Request to Move from Project-Based Voucher to Tenant-Based Voucher	0	0%
Other	5	17%

Source: PCC's HCV Reasonable Accommodations List

For active residents and participants in Public Housing and the HCV Program requesting reasonable accommodations, the current numbers of persons with disabilities on PCC's reasonable accommodations waitlists are:

Public Housing: 208 individuals or families have been approved for a reasonable accommodation.

HCV Program: 30 Individuals or families have been approved for a reasonable accommodation. \*

\* (please note that there is no tracking information available prior to 2019 for analysis.)

There is no current record of the HCV Program Applicant's reasonable accommodation requests available for analysis currently.

On the LIPH Reasonable Accommodations waitlist, 151 requests have been completed between current and previous approved requests. There are 208 individuals or families still pending to receive unit offers to accommodate their needs.

**3. What is the current inventory of units with accessible features for mobility, hearing, and vision impairments, and the occupants currently living in those units at Park City Communities?**

There are currently 7 units having UFAS compliant mobility, hearing, or vision accessible features in PCC's inventory. These units are located at the property known as Fireside Apartments, 655 Palisade Avenue, Bridgeport, CT 06610. This complex is designated for Elderly and Disabled Low Income Public Housing residents.

There are 7 additional units nearing completion and vacant, along with, 5 units currently under construction also located at Fireside Apartments.

**Findings: Survey**

**1. What is the need for current units that contain accessible features related to mobility, hearing, or visual impairments? What specific accessible features are needed? Do individuals have the accessible features they need in their homes and housing sites?**

Individuals with disabilities often require additional housing specifications or modifications to accommodate their disability. Due to these additional housing requirements, it can be exceedingly difficult for those with disabilities to find suitable housing, especially if they are low-income and/or looking for rental housing. Furthermore, providing housing that addresses the needs of individuals with disabilities can be difficult as the term "disability" encompasses a broad spectrum of disability types and socioeconomic situations that generate a correspondingly large variety of unique housing needs. Identifying where the need is greatest can inform decisions about where to prioritize efforts going forward.

For this study, a disability need questionnaire was administered to Park City Communities Low Income Public Housing residents, LIPH applicants on the waitlist, Housing Choice

Voucher participants, and HCV applicants on the waitlist. Survey questionnaires were received by mail.

This survey instrument was designed to collect information from current housing residents, participants, and applicants who have mobility, hearing, or visual disabilities and require housing units with accessible features.

The survey questionnaire was administered with the objective of getting answers to the following core questions:

- A. Does anyone in your household have a disability?
- B. What kind of accessible features, if any, do you need in your housing unit?  
(Mobility, Hearing or Visual)
- C. Is your home fully accessible to you considering your disability?
- D. Are the amenities of your public housing complex or housing site fully accessible to your disability?
- E. What accessible features, if any, are currently provided in your current housing?

Out of a total of approximately +/- 6000 questionnaires sent out for responses; 362 surveys were received with responses. Some of the responses received did not provide enough information to have an objective assessment of housing needs of disabled persons.

According to the received survey responses, the following analysis of the information collected will provide a synopsis of the current need for accessible features related to mobility, hearing, or visual impairments in their homes or housing sites:

1. Hearing Impairment Features: 11% of the 362 respondents indicated a need for hearing impairment features such as visual doorbells and visual fire alarms.
2. Vision Impairment Features: 7% of the 362 respondents indicated a need for vision impairment features such as accessible controls and signage.
3. Mobility Impairment Features: 33% of the 362 respondents indicated a need for mobility impairment features such as the need for grab bars, 1<sup>st</sup> floor units, 1<sup>st</sup> floor bedroom & bathroom, and/or a handicap ramp. 7% indicated a need for a fully accessible unit.

Out of the total responses, 52% of the respondents indicated some form of disability. 42% of the respondents indicated that their current unit is fully accessible considering their disability. 23% indicated that their current unit is not fully accessible considering their disability. 40% of persons reporting a disability were participants in the Housing Choice Voucher Program and Housing Choice Voucher Program applicants combined.

These percentages indicate that a substantial share of households with a disability live in housing potentially not matched well to their accessibility needs and/or live-in properties not designated for people with disabilities. These findings indicate unmet program needs for accessible housing.



For example, 25% of the respondents indicated in the open response category of the survey the need for a 1<sup>st</sup> floor unit, 1<sup>st</sup> floor bedroom & bathroom and grab bars. 16% of the respondents are participants or applicants of the Housing Choice Voucher Program. The remaining respondents were residents or applicants of Low-Income Public Housing. However, it should also be noted that 36% of the responders were not identifiable because they did not indicate their program type which made it complex to make an objective assessment of where the need is greater. However, with the collected information it can be surmised that more than half the survey responders have a need for accessible features and/or an accessible unit.

## **A. RECOMMENDATIONS**

### **I. Meet Accessibility Needs in Current Units**

It was observed that many of the Park City Communities financed section 8 housing units where persons with disabilities currently reside do not meet the accessibility needs. As the accessibility requirement of each disabled resident vary, an assessment was conducted via a survey instrument.

A significant number of responders indicated the need to have modifications especially for grab bars being the most requested modification followed by lowered cabinets, visual doorbells, and visual fire alarms. Accessibility needs of the severely handicapped residents is a priority and Park City Communities, in cooperation with the Property Management Companies, and/or landlords, can suggest programs to carry out these need-based cost-effective modifications to section 8 participants. For example, disabled participants can contact the city's local Independent Living Center where low-interest loans and grant money is available to allow seniors to modify their homes to make them safer and more accessible. Modifications include, installing ramps, stair glides, grab bars in bathrooms, widening doorways, and lowering counter heights or other necessary modifications. Often the program eligibility is based upon income. With the aging population, this can be a great resource to be able to meet some or most of their disability needs.

There are also programs administered by the Department of Aging and Disability Services who assist consumers to assess the accessibility of their homes or apartments and help them find the supplies and services needed to make modifications.

With respect to Low Income Public Housing, in the existing units, PCC must identify units to convert into accessible units and provide them as needed to disabled residents. Special funds from HUD may be requested for this purpose or utilization of The Community Block Grant Program (CDBG). Development of handicapped units in the future must meet the accessibility standards as provided in the Fair Housing Amendments Act. PCC must implement strategies to find cost effective ways of carrying out modifications in the existing units to meet the accessibility standards.

## **II. Prioritizing Reasonable Accommodations**

A tenant selection plan for approved reasonable accommodations is an effective way of providing housing to the handicapped persons both in the existing developments and future developments. Priorities in the selection of tenants may be given in the following order:

1. Severely disabled, requiring wheelchair.
2. Moderately disabled, requiring wheelchair.
3. Disabilities other than requiring wheelchair use.

More movement on PCC's reasonable accommodations waitlist can help to alleviate the needs of disabled persons in Low Income Public Housing as accessible units become available in accordance with PCC's Accessibility Conversion Plan.

There exists a large gap between those disabled persons who are in need of housing and the number of handicapped units available.

PCC is striving to solve the huge task of providing affordable housing to handicapped and elderly populations of the city.

The overall goal of Park City Communities is to integrate persons with disabilities with nondisabled communities. Adaptable housing is the best medium through which this could be achieved. Towards the goal of integration and independent living of disabled persons, Park City Communities should support the development of adaptable housing.

### **B. DESIGNATION OF RESPONSIBILITY**

In accordance with The Americans with Disabilities Act, (ADA) Section 504 of the Rehabilitation Act of 1973, (Section 504), the Housing Authority of the City of Bridgeport has designated the following person to serve as ADA Title II Administrator, to oversee the agencies policies, procedures, and approvals in relation to reasonable accommodations and equal access of all PCC federally assisted programs and services:

**Name:** Gisela Vazquez Job **Title:** Disabilities Rights Coordinator  
**Contact Information:** 203.337.8991; [gvazquez@parkcitycommunitites.org](mailto:gvazquez@parkcitycommunitites.org)

In accordance with The Americans with Disabilities Act, (ADA) Section 504 of the Rehabilitation Act of 1973, (Section 504), the Housing Authority of the City of Bridgeport has designated the following person to serve as Implementation Coordinator, to plan and implement property conversion, monitor plan progress, manage review and updates of this document and act as point of contact to interested parties:

**Name:** David Ghio Job **Title:** Director of Planning, Modernization & Development  
**Contact Information:** 203.337.8955; [dghio@parkcitycommunitites.org](mailto:dghio@parkcitycommunitites.org)

## **C. STRATEGIC PLANNING AND IMPLEMENTATION**

*Source: Park City Communities Accessibility Conversion Overview Plan*

PCC has completed a comprehensive accessibility evaluation of its properties in accordance with the requirements of 28 CFR Part 35 and City of Bridgeport Building Code sections related to accessibility. The conclusions and recommendations presented in this report are based on the evaluations of properties under the jurisdiction of the Bridgeport Housing Authority, associated documentation related to the properties and input from PCC staff. Accessibility evaluations were conducted by Rodriguez Associates and PCC Modernization and Asset Management staff during site visits to individual properties.

As required by 24 CFR 8.26 “accessible dwelling units required by § 8.22, 8.23, 8.24 or 8.25 shall, to the maximum extent feasible and subject to reasonable health and safety requirements, be distributed throughout projects and sites and shall be available in a sufficient range of sizes and amenities so that a qualified individual with handicaps' choice of living arrangements is, as a whole, comparable to that of other persons eligible for housing assistance under the same program.” Accordingly, and based upon review and analysis of PCC’s projected 2029 housing portfolio, it has been determined that 121 units are required to be UFAS compliant.

In alignment with guidance provided to PHA’s by the Department of Housing and Urban Development (HUD) in PIH Notice 2010-26 (HA) Section I, Subpart (B) Section 504/24 CFR 8 – Major Provisions, Calculating the Required 5% and 2%., “PHAs and all other HUD recipients must calculate and provide the proper number of accessible units consistent with the applicable requirements of Section 504.....24 CFR § 8.22 (b), requires a minimum of 5 percent of the total dwelling units be made accessible for persons with mobility impairments. An additional 2 percent of the total units must be made accessible for persons with hearing or vision impairments.” Agencies are instructed that any fraction of a whole number be rounded up to the next nearest whole to fully meet compliance requirements when calculating the required number of units. Consequently, using the round-up methodology, it has been determined that PCC must bring 129 units into UFAS-compliance.

The Capital Fund Program (CFP) provides financial assistance in the form of grants to public housing agencies (PHAs) to carry out capital and management activities including those listed in Section 9(d)(1). For the purposes of PCC’s Overview Plan, accessible when used with respect to the substantial alteration of a unit, or a portion of a facility other than an individual dwelling unit, means that the facility or portion of the facility when altered can be approached, entered, and used by individuals with physical handicaps and hearing and visual impairments. In addition, it means the unit is located on an accessible route and is otherwise in compliance with the standards set forth in 24 CFR 8.32.

PCC's has budgeted approximately \$7,350,000.00 in its 5-Year Capital Action Plan over the course of the next five years to address required accessibility conversion within our portfolio.

In conclusion, the overall goal for Park City Communities is to convert units to meet the required minimum of 5% of housing units needed to be made accessible for persons with mobility impairments, and, that an additional 2% of housing units are made accessible for persons with hearing or vision impairments in accordance with Section 504 of the Rehabilitation Act of 1973 and 24 CFR §§ 8.22, 8.23.

### **FIRESIDE APARTMENTS**

Fireside Apartments represents some of the oldest Public Housing Developments in the State of Connecticut. It consists of four (4) developments with shared borders, giving the appearance of a single planned community. There are 272 one (1) bedroom units which are masonry, wood framed, single story flat-type residences built as phased-in construction beginning in 1959 and spanning though 1961 and 1963. The building layout is quad style with groupings of 3, 4 or 5 units in each building with shared front and rear yards. A network of sidewalks and parking lots are strategically located in proximity of the residential units. Various sitting areas and gardens are located throughout the development and other amenities include a management office, community meeting rooms and laundry facilities.

Park City Communities (PCC) is currently involved in conversion efforts for UFAS compliance in this community. Upon project completion Fireside accessible units will number 20 units.

PCC, with the approval of the Department of Justice, has engaged the services of a certified UFAS neutral inspector. The neutral inspector will evaluate all aspects of the compliance requirements inclusive of unit interiors, signage public and private access, and all amenities. The neutral inspector will prepare a letter of certification that will be presented to the United States Department of Justice immediately upon receipt or as otherwise directed.

The first inspections are expected to begin on April 5, 2021 with Steven Winters & Associates as the neutral inspector.

### **TRUMBULL GARDENS**

Trumbull Gardens contains 414 units. The units are in two (2) 8 story hi-rise buildings and a series of Town-home style clusters spaced out along Trumbull Avenue in Bridgeport's north end of town.

The hi-rise buildings are constricted on concrete and masonry. The masonry (CMU) walls are both structural and demising/partition. Domestic plumbing, heating, mechanical and electrical systems are incased in the masonry structural walls as well as the party walls.

The location of these systems and the finite footprint of each unit represents a series of challenges when considering the required alteration for UFAS compliance. PCC has preliminary considered these two (2) building beyond a reasonable financial cost to modify regarding mobility-UFAS compliance. These building are very typical of public housing nationwide. Similar PCC developments also contain the building type/style.

These hi-rise building do not comply with modern public housing philosophies that consider defensible space. The hi-rise model is often compared to the “warehousing of people”. High density living quarters poor air and ventilation qualities, high crime associated with this style development has led PCC to consider these buildings financially and practically obsolescent. These hi-rise buildings are currently under strong consideration for RAD/Section 18 replaces.

The reasons stated above PCC will utilize the Town Home style units for UFAS and Hearing/Visual Impaired modification. The hi-rise unit and bedroom count will remain in the calculations for compliance until such time they are accepted into a HUD certified repositioning program. The town-home style units are mostly 2 story dwellings, for this reason no two-story dwelling can ever be made compliant without an elevator or certified personal lift. PCC has identified 17 of 21 single story units that had once been considered the developments ADA compliant units. Upon project completion Trumbull Gardens will contain 29 UFAS compliant units.

#### **P.T. BARNUM APARTMENTS**

Built in 1951 and modernized in 1995, they are considered non elevator walk up style. There are second floor units that contain stairways to the third floor consisting of bedrooms and bathrooms only. The 18 buildings also have first floor single level dwellings. These are the units targeted for UFAS modifications.

There are 18 residential buildings, each contain 20 living units of assorted bedroom counts totaling 360 apartments. In addition to the residential buildings, there is an admirative office building that also contains the laundry facility and mail room. Gary Crooks auxiliary building has a community room as well as PCC office space. Various community groups and associations regularly conduct meeting/gatherings at this location. The site is a former landfill. Over many years the site has shown severe ground settling, the settling has created uneven walk and parking surfaces that will be corrected with the UFAS compliance efforts in year 3 of the Overview Plan.

The buildings are constructed of concrete floors and brick masonry exterior walls. PT Barnum, although not a hi-rise, is also considered a hi-density development. PCC has marked PT Barnum as a candidate for RAD/Section 18, but the priority level will require UFAS modifications to be completed in accordance with the current plan.

Eighteen (18) UFAS units and eight (8) hearing & visual units are necessary for UFAS compliance. PCC has identified 12 of the minimum 18. PCC will instruct Architectural and Engineering firm of record to establish a series of options to achieve the minimum 18 and

8 units. Such options include the re-designing of one or more buildings. Building Number 8 was recently vacated due to a fire. Should 10 PCC best option be to re-design any building, building Number 8 would be the prime candidate, as it already has been vacated. Upon project completion, P.T. Barnum will contain 26 UFAS compliant units.

### **SCATTERED SITES I**

Scattered Sites I has 254 dwellings consisting of all bedroom sizes from 1 to 6. This development is comprised of many and varied building types and styles of construction and architecture. The vast majority are single-family homes from the 1940's that have been converted into multi-family homes.

Often of the Victorian style, large wood framed, steep pitch roof buildings with singular interior staircases and exterior porches and egress stairs. They are typically contained on a city building lot in well-developed neighborhoods. Unlike the larger family developments, A/E services for corrective action is expected to be a greater portion of the financial commitment to accommodate a small number of units. Scattered Sites I does include several smaller walk-up style buildings, and few have elevators. The elevator buildings would be the most likely candidates for conversion, however, they typically have only the smaller bedroom counts. PCC has committed to a large-scale repositioning and master development plan going forward. The re-positioning will include the enforcement of all newly built and or acquired properties to include the minimum standards for UFAS and hearing and visual unit compliance going forward. Upon project completion, Scattered Sites I will contain 19 UFAS compliant units.

### **SCATTERED SITES II**

Scattered Sites II has 309 dwellings consisting of all bedroom sizes from 1 to 6. This development is comprised of many and varied types and styles of construction and architecture. The vast majority are single-family homes from the 1940's that have been converted into multi-family homes. Often of the Victorian style, large wood framed, steep pitch roof buildings with singular interior staircases and exterior porches and egress stairs. They are typically contained on a city building lot in well-developed neighborhoods. Unlike the larger family developments, A/E services for corrective action is expected to be a greater portion of the financial commitment to accommodate a small number of units.

Like Scatter Sites I, Scattered Sites II does include several smaller walk-up style buildings, and few have elevators. The elevator buildings would be the most likely candidates for conversion, however, the elevator buildings typically have only the smaller bedroom counts. PCC has not yet considered all its options for UFAS conversion as it relates to the SSI inventories. PCC has committed to a large-scale repositioning and master development plan going forward. The re-positioning will include the enforcement of all newly built and or acquired properties to include the minimum standards for UFAS and hearing and visual compliance going forward.

## **ALBION APARTMENTS**

The Albion Apartments is a recent addition to the PCC portfolio. Completed in 2012-2013 the Albion is a mixed use LITCH Partnership. The Albion represents the future of public housing nation-wide. This is an attempt to include private money to support public housing. The Albion has 35 units of mixed bedroom sizes. Specific determination of the product mix was unavailable at time of this writing. The Albion is a 5-story elevator building. The common areas and access are typically in-line with modern building codes, Interior spaces will be confirmed in the coming months to define the likelihood of existing compliant or near compliant units.

## **FRANKLIN & ELEANOR APARTMENTS**

The Franklin and the Eleanor Apartments is a 24 unit converted hospital with wide hallways and an elevator which lends this property to excellent candidacy for conversion and compliance. PCC has a high level of confidence that the ACC units can be modified to comply with UFAS and may already meet the hearing and visual minimum standards.

## **MAPLEWOOD APARTMENTS**

This community is a converted school with 8 ACC units. Maplewood and PCC are currently engaged in a negotiation that would swap out delinquent properties for existing UFAS compliant units. The Maplewood units identified as PCC units have been negatively affected by hurricane Sandy and poor management. PCC has leveraged its units with current managements desire to refinance. The end goal would be to have more readily modified units exchanged for a better management plan and to bring this property and PCC in compliance with the minimum UFAS and H&VI standards.

## REFERENCES

1. City of Bridgeport Census of Disabled Persons 2019, United States Census Bureau
2. American Community Survey 2019 (ACS)
3. PIC PIH Information Center, U.S. Department of Housing and Urban Development
4. Yardi Voyager, PCC's Residential Property Management Software
5. Park City Communities Reasonable Accommodations waitlists, Low Income Public Housing and Housing Choice Voucher Programs.
6. Park City Communities Accessibility Conversion Overview Plan
7. Park City Communities Disability Needs Questionnaire, Survey