



Housing Accessibility: Needs & Opportunities in Detroit

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**Housing & Revitalization Department
Policy Development & Implementation Division**



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I. INTRODUCTION

Approximately 1 in 5 Detroit residents live with a disability. Of those living with a disability, 43% of these Detroiters lived below the poverty level in the last year, according to 2023 federal estimates. Residents and advocates report an insufficient supply of housing that is affordable and accessible in Detroit. As more residents age, this scarcity will pose an even larger challenge to overcome.

The Detroit City Council requested the City of Detroit Housing and Revitalization Department (HRD) to conduct a study evaluating accessible housing needs in Detroit. HRD contracted with Detroit Disability Power, a local advocacy organization, and The Kelsey, a national non-profit organization advancing disability-forward housing, to conduct resident outreach, housing stakeholder engagement, and national best practice research.

This report includes:

- Population statistics for residents with disabilities in Detroit and a summary of accessible housing needs in Detroit and Michigan
- Definitions of accessible housing and designing housing opportunities for all abilities
- An inventory analysis of accessible housing in Detroit
- A summary of how accessibility is promoted through federal, state and local law and practices
- Insights from residents, service providers, developers, and property managers that reveal accessible housing gaps
- Potential solutions to enhance accessible housing options in Detroit

The intended use of this report is to inform the City's strategy to ensure adequate, quality housing for residents with disabilities through a combination of programmatic and policy approaches.

HRD staff give special thanks to The Kelsey and Detroit Disability Power for their efforts and leadership on this project and to the many residents, service providers, property managers, developers, and community organizations who dedicated their time, expertise, and assistance to this study.

II. DISABILITY POPULATION DATA

Federal estimates show that an estimated 123,795 Detroit residents have some form of disability. As shown in the table below, disability is present in several age brackets,

illustrating how present and future housing stock and infrastructure must be designed to fit these needs.¹

Figure 1: Residents with a Disability by Age Group

Age Range	Number of Residents in Detroit Within This Age Range	% of Residents in this Age Range with a Disability
Under 5 years old	43,597	0.9%
5 to 17 years old	115,305	8%
18 to 34 years old	157,288	12%
35 to 64 years old	223,357	25%
65 to 74 years old	56,758	36%
75 years and older	35,319	53%

The top three most common disabilities among Detroiters, in order, are:

- **Ambulatory difficulties:** Having serious difficulty walking or climbing stairs
- **Cognitive difficulties:** Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions
- **Independent living difficulties:** Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping.²

More information on the types of disabilities present among Detroiters can be found in Figure 2. Notably, federal data shows that 68,957 Detroiters live with two types of disability or more.³

Figure 2: Count of Residents with a Disability by Disability Type

Disability Type	Number of Residents
With a hearing difficulty	17,972
With a vision difficulty	25,214
With a cognitive difficulty	54,415
With an ambulatory difficulty	69,796
With a self-care difficulty	32,272
With an independent living difficulty	52,632

¹ <https://data.census.gov/table?q=detroit%20disability>

² <https://data.census.gov/table/ACSST5Y2023.S1810?q=detroit%20disability>

³ <https://data.census.gov/table/ACSDT1Y2023.B18108?q=detroit%20disability>

Of those 16 years and older with a disability in Detroit, 19% are employed and 76% are not in the labor force, meaning they are not working and not actively looking for work.⁴ Of those without a disability, 56% are employed and 35% are not in the labor force.

Latest federal data from 2013 shows that among working-age Detroiters, stark employment differences existed between those with disabilities and those without disabilities. Of the 97,956 Detroiters ages 16-64 living with a disability in Detroit at that time, 77% had not worked in the past 12 months.⁵ Of the 351,917 Detroiters ages 16-64 who did not live with a disability, 39% had not worked in the past 12 months.

Chronically low wages and significant economic insecurity levels impact both disabled and nondisabled residents in Detroit. Median earnings for a resident with a disability in 2023 were \$23,405, while the median earnings for a nondisabled resident were \$32,712.⁶ Poverty statuses across Detroit's population can be found in Figure 3.

Figure 3: Intersection of Poverty and Disability		
Poverty Status in the Past 12 Months	Percent of Population 16+ with a disability	Percent of Population 16+ with no disability
Below 100% of the poverty level	38.1%	24.6%
100 to 149% of the poverty level	14.2%	11.2%
At or above 150% of the poverty level	47.7%	64.2%

Nationally, in 2024, the unemployment rate for persons with disabilities ages 16-64 was 8.1%, approximately double the unemployment rate for people without a disability ages 16-64, which was 3.9%.⁷ That year, the labor force participation rate for those with disabilities ages 16-64 was 40.7%, while the participation rate for those without disabilities in the same age range was 77.9%.⁸

III. DEFINING ACCESSIBLE HOUSING

A plethora of housing elements can be incorporated into housing units to make them more accessible for residents with differing abilities or health care needs. Common features include:

1. **Zero-step entrances:** Eliminates steps at home or unit entrances, which is more accessible for those with mobility disabilities or who use mobility devices.

⁴ <https://data.census.gov/table/ACSST5Y2023.S1811?q=detroit+disability>

⁵ <https://data.census.gov/table/ACSST5Y2013.C23023?q=disability+detroit+employment>

⁶ <https://data.census.gov/table/ACSST5Y2023.S1811?q=detroit+disability>

⁷ <https://www.dol.gov/agencies/odep/research-evaluation/statistics>

⁸ <https://www.dol.gov/agencies/odep/research-evaluation/statistics>

2. **Wider doorways and hallways:** Provides additional room for residents who use wheelchairs to easily navigate living spaces.
3. **Grab bars:** Often installed in bathrooms to provide additional support and stability for residents.
4. **Roll-in shower:** Showers that have flat or low thresholds so residents who use wheelchairs can easily roll into the shower. Roll-in showers are also helpful for those with mobility challenges who find taking high steps difficult.
5. **Lowered countertops:** Countertops lower than standard countertops so that they reduce the need to bend or reach over the counter, creating better living experiences for residents with mobility needs.
6. **Lever-style handles:** A more accessible handle option than knobs because they only require a simple pushdown/pull-up motion versus a twist. Lever-style handles can be easier to use for residents with limited dexterity.

Several federal laws and building codes inform the accessibility requirements of housing units. These are *minimum* standards, and often only target those with mobility and sensory disabilities and may exclude a range of other differing abilities residents may possess.

Some common unit types for units with accessible housing features are:

Type	Unit Features
Type A	Designed to provide accessibility for individuals who use wheelchairs throughout the unit. While some features are constructed for immediate accessibility, such as wider doors with maneuvering clearances for a wheelchair, other features are provided with the necessary infrastructure to be made accessible later if needed.
Type B	Designed to be more accessible than standard units but not as comprehensively accessible as Type A units. These units are designed to be easily modified to fit the needs of residents who may need more accessible features.
Type C	Known as visitable units, visitable homes have three core features: a zero-step home entrance on an accessible path of travel from a street, sidewalk, or roadway; wider ground-floor doorways and hallways; and access to a ground-floor bathroom.

Moving beyond the minimum requirements prescribed by law or code, an alternative approach to housing construction is designing for “universal accessibility” where architects focus “on creating spaces that cater to the needs of everyone, rather than just people with very specific access requirements.”⁹ This type of design can be cross-disability, meaning it

⁹ <https://directaccessgp.com/us/news/how-inclusive-and-accessible-design-leads-to-future-proof-housing-developments/>

addresses a wide range of abilities, and can create environments that can be easily used by people with varying needs and backgrounds.¹⁰

This type of design approach expands on the known concept of “universal design;” some practitioners state a universal design is difficult to obtain since there is no singular design that can meet all people’s needs and abilities.

FEDERAL LAWS FOR HOUSING ACCESSIBILITY

Contrary to public perception, the Americans with Disabilities Act (ADA) is not the federal rule that exclusively governs accessibility requirements in housing. The ADA outlines accessibility requirements for public facilities, such as restaurants, hotels, and parks.¹¹ Regarding housing, its rules apply to units provided by state and local governments (including the public housing operated by the Detroit Housing Commission). It also requires accessibility for public and common use areas in housing developments.

Two federal laws that prescribe accessibility requirements in housing are (1) the Fair Housing Act and (2) Section 504 of the Rehabilitation Act. Accessibility standards also are reflected in state and local building code, which help guide the design of affordable housing developments.

Fair Housing Act

As one of the premier civil rights laws in the country, the Fair Housing Act prohibits housing discrimination on the basis of race, color, religion, sex, disability, familial status, and national origin. The legislation prohibits discrimination in both publicly funded and privately-owned housing.¹² The Act also maintains that housing providers must provide equal access to housing opportunities for residents with disabilities by allowing for reasonable accommodations and reasonable modifications. Reasonable accommodations are changes to policies and procedures and modifications are changes to the structure of a unit or property to enhance access for those with disabilities.

The Fair Housing Act also outlines basic accessibility requirements for buildings with four or more units that were built for first occupancy after March 13, 1991.¹³ If a building has an elevator, all units must have the basic accessibility requirements. If the building does not

¹⁰ <https://www.nlc.org/article/2025/01/27/disability-forward-design-across-multiple-cities/>

¹¹ https://www.hud.gov/program_offices/fair_housing_equal_opp/disabilities/accessibilityR

¹² <https://www.ada.gov/resources/disability-rights-guide/#rehabilitation-act>

¹³ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-I/part-100/subpart-D/section-100.205>

have an elevator, only the ground floor units must have these minimum features.¹⁴ Basic accessibility requirements under the Fair Housing Act include:¹⁵

- Public and common areas are accessible
- Property entrances are accessible to those using wheelchairs
- All units that must meet accessibility requirements must have:
 - Accessible routes into and through the units
 - Light switches, electrical outlets, thermostats, and other environmental controls must be placed in accessible locations
 - Bathroom walls must be reinforced to allow for installation of grab bars
 - Kitchens/bathrooms must allow wheelchair users to move around the space

Section 504 of the Rehabilitation Act

Section 504 of the Rehabilitation Act says that no one with a disability can be excluded from or denied the benefits of programs or activities that receive federal financial assistance, such as housing developments that receive federal affordable housing funding. For a federally-assisted new construction housing project, Section 504 requires 5% of the dwelling units, or at least one unit, whichever is greater, to be accessible for persons with mobility disabilities. An additional 2% of the dwelling units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities.¹⁶ For example, in a publicly assisted new housing development with 40 units, only two units need to be accessible for those with mobility disabilities.

Limitations of Law

Despite federal law protecting some level of accessibility in housing developments, the prescribed accessible housing features represent a minimum standard and may not provide enough accessibility for all residents with disabilities to guarantee full ease of use.

More accessibility requirements are also afforded to buildings with public funding, meaning the majority of Detroit's housing stock – privately-owned, single-family housing – is not required to include this minimum level of accessibility.¹⁷ Affordable housing preservation projects that include building rehabs do not need to meet the maximum

¹⁴

https://www.hud.gov/program_offices/fair_housing_equal_opportunity/faq_accessibility_first#:~:text=No%2C%20the%20Fair%20Housing%20Act's%20design%20and%20construction%20requirements%20only,ground%20floor%20units%20are%20covered.

¹⁵ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-I/part-100/subpart-D/section-100.205>

¹⁶

https://www.hud.gov/program_offices/fair_housing_equal_opportunity/disabilities/sect504faq#Physical_Accessibility

¹⁷ <https://www.nahb.org/advocacy/legal-issues/accessibility/ada-and-accessibility-whats-the-difference>

Section 504 accessible housing requirements if they have fewer than 15 units and/or the cost of rehab is less than 75% of the replacement cost of the completed facility.¹⁸

THE IMPORTANCE OF DESIGNING FOR ALL

Originally developed by a team at the Center for Universal Design at North Carolina State University, the concept of “universal design” is guided by seven principles, including that the design provides the same means of use for all users, users are not segregated, the design accommodates a wide range of preferences and abilities, and the design is easy to understand.¹⁹

While universal design aims to increase access to the greatest number of people, this framework can be limiting because it “enforces a single design solution without need for adaptations or specialized design.”²⁰ Although the alternative concept of designing for all has been used more broadly in the technology sector, this kind of concept can be a helpful methodology to apply to architecture, the built environment, and housing design.

When creating housing for residents of all needs, design should consider the full range of human characteristics with respect to identities like ability, language, culture, age, and other forms of human difference.²¹ This design principle also acknowledges that constructing housing in this way does not just benefit residents with specific disabilities; it helps residents of all backgrounds and needs live more comfortably in their homes. This design model also “incorporates concerns beyond physical access, recognizing the need for environments that are not only accessible, but also welcoming, dignified, and reflective of occupants’ identities and needs.”²²

Broadly speaking, to enhance accessibility and ease of use in housing, the following principles should be considered in housing design and the development process:

1. Development and design processes should incorporate the input and decision-making of a wide pool of residents. Assumptions should not be made about what users want or need.

¹⁸

https://www.hud.gov/program_offices/fair_housing_equal_opp/disabilities/sect504faq#:~:text=Answer%20Section%20504%20of%20the,part%208.

¹⁹ <https://universaldesign.org/definition>

²⁰ <https://www.nngroup.com/articles/inclusive-design/#:~:text=Universal%20design%20aims%20to%20create,for%20adaptations%20or%20specialized%20design.>

²¹ <https://legacy.idrc.ocadu.ca/about-the-idrc/49-resources/online-resources/articles-and-papers/443-whatisinclusivedesign>

²² <https://www.dbarchitect.com/blogs/accessibility-inclusion-housing-design>

2. Design should recognize and respond to the uniqueness of each individual across a range of identities and abilities. Flexible and adaptable designs can meet this wide range of needs, versus forcing a one-size-fits-all approach on residents.
3. Most accessibility-related laws only consider a very narrow range of disabilities; housing design should acknowledge and responds to the wide spectrum of abilities and access needs among all residents.

The Kelsey, a development and advocacy organization whose work in affordable housing lies at the intersection of disability justice and trauma-informed design, has published a set of Design Standards that follow these goals, which aim to equip designers, builders, and developers with guidelines and frameworks for disability-forward housing creation.²³ These standards include design elements for buildings, common spaces, dwelling units, and operations and amenities.

Examples of design features that follow the philosophy above are described below:



*Exterior guide strips can provide wayfinding systems for people with vision challenges. It can also help orient people to where they are in the space, and help visitors easily navigate a residential property.
Photo courtesy of The Kelsey.*

²³ <https://thekelsey.org/design/>



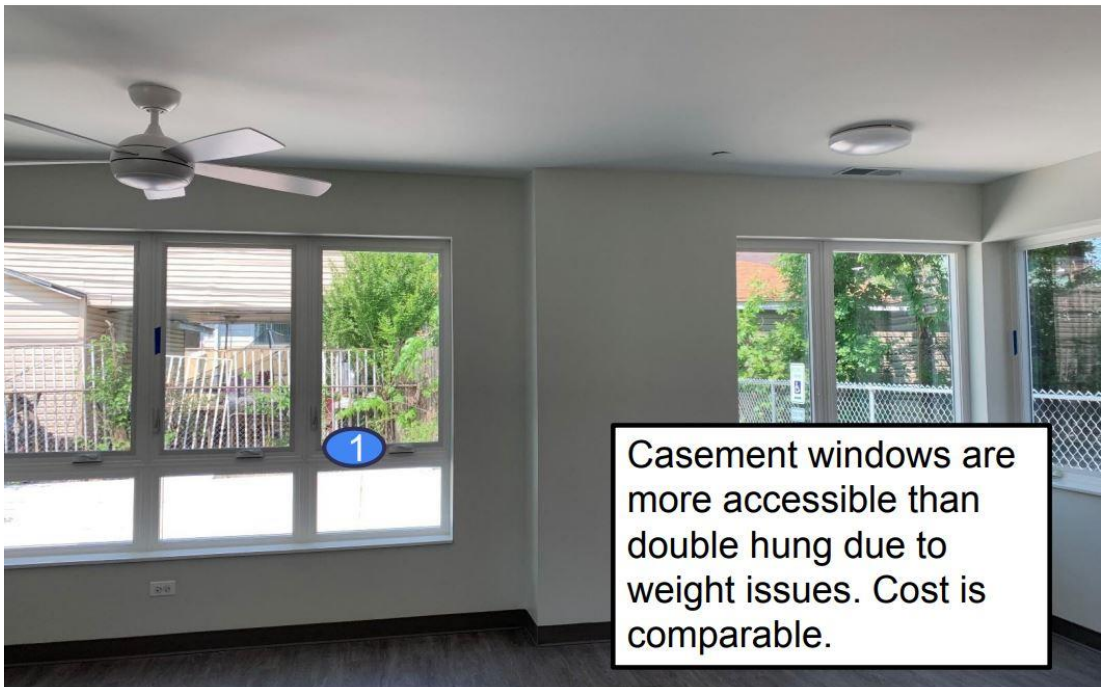
Handrails can help those who need support while navigating hallways in common areas. Photo courtesy of David Baker Architects.



Implementing materials to address acoustics can help those with sensitive hearing and provide a better hearing experience. Photo courtesy of David Baker Architects.



Accessible property entrances should require zero steps to enter the property. Photo courtesy of Illinois Facilities Fund.



Casement windows are less heavy than double hung windows, which can then be used more easily by those with less strength in their upper body. Photo courtesy of Illinois Facilities Fund.



Windows with low sills offer an equal viewing experience to shorter or seated residents. Photo courtesy of The Kelsey.

IV. ESTIMATED ACCESSIBLE HOUSING INVENTORY

In Detroit, there is no official centralized database of accessible housing units across the city. HRD recently begun documenting the specific unit numbers of accessible units located in buildings receiving public affordable housing funding and are in the development pipeline or under construction.

The extent to which residential properties in Detroit contain accessible units is dependent on several factors, including:

- If the property received public funding
- The date of first occupancy/age of property
- If the property has undergone extensive rehab that triggered additional accessibility requirements
- If landlords voluntarily chose to install accessibility features in their properties

In part due to these variances, it is difficult to calculate exactly how many accessible units exist in Detroit and get information on their exact unit features, unit layout, affordability levels, etc.

Accessible Units in City-Funded Portfolio

For the purposes of this study, HRD calculated an estimate of the number of accessible units that could exist in the regulated affordable housing portfolio across the city built or under construction after 1991. Roughly 10,216 units exist in regulated affordable housing built for first occupancy after 1991. Using the accessibility requirements under the Fair Housing Act, this means an estimated 511 of these units could be accessible to those with mobility disabilities, and 204 units could be accessible to those with hearing or visual

disabilities. More research must be conducted to determine the exact number of accessible units in the regulated affordable housing portfolio across Detroit.

Units Covered by the Fair Housing Act

HRD also estimated the potential inventory of accessible housing by examining the applicability of the Fair Housing Act to housing in Detroit. The Fair Housing Act requires all "covered multifamily dwellings" designed and constructed for first occupancy after March 13, 1991 to be accessible to and usable by people with disabilities. Covered multifamily dwellings are all dwelling units in buildings containing four or more units with one or more elevators, and all ground floor units in buildings containing four or more units, without an elevator.

The majority of housing units in Detroit were built prior to the enactment of requirements under the Fair Housing Act:

Figure 4: Housing Units in Detroit by Applicability of the Fair Housing Act		
Time Frame	# of Housing Units Built	Approx % of Housing Units Built Under Fair Housing Act
1990 or Later	17,168	6.7%
Before 1990	238,689	93.3%

More than 93% of housing units were built prior to 1990 and therefore were not required comply with the accessibility requirement of the Fair Housing Act. Further, only a portion of units built after March 1991 are accessible. The Fair Housing Act only applies to development with 4+ units and only requires accessibility of ground floor units in buildings without elevators. The Act also does not require full accessibility of units, as accessibility requirements are modest and focus on ease of adaptability.

U.S Supply Gaps and Housing Barriers

The shortage of affordable, accessible housing stock is a significant challenge across the United States. According to 2011 data, the last year for which data were available from the American Housing Survey, fewer than 4% of homes offered three core features of accessible housing: single-floor living, no-step entries, and wide hallways and doorways.²⁴

A 2023 survey by Freddie Mac showed that nearly half of renters with disabilities say their homes are minimally or not at all accessible.²⁵ In that survey, residents most often reported

²⁴

https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_Housing_Americas_Older_Adults_2023_Revised_040424.pdf

²⁵

https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_Americas_Rental_Housing_2024.pdf

needing bathroom mobility aids, home security systems, no-step entries, and accessible electrical outlets.

V. RESIDENT & STAKEHOLDER EXPERIENCE

HRD commissioned Detroit Disability Power and The Kelsey to:

- Conduct a qualitative study about accessible housing needs and challenges among residents, property managers, developers, and service providers.
- Conduct a learning series about accessible housing practices open to the public and housing practitioners.
- Create materials for residents, property managers, and developers to inform stakeholders about the housing rights of residents with disabilities and best practices in creating accessible housing.

For the study, The Kelsey:

- Conducted six listening sessions with disabled residents, caregivers and service providers
- Conducted 1:1 interviews with property managers
- Organized two roundtables in partnership with the Urban Land Institute Michigan for developers, designers and planners
- Launched a public survey for residents with disabilities and their caretakers to share their perspectives on accessible housing

Community Engagement Activity	Number of Participants
1:1 Interviews with Property Managers	12
Developer, Planner, & Designer Roundtables (2)	54
Listening Sessions w/ Disabled Residents (5)	25
Service Provider Listening Session	14
Larson Center Fellows Roundtable	26
Survey for Disabled Residents	166
Survey for Caretakers	45
Total Unique Individuals Engaged:	332

Key findings per stakeholder group are summarized below.

RESIDENTS WITH DISABILITIES & CAREGIVERS

Of the residents who responded to the survey, respondents represented 67% of the city's zip codes. Respondents skewed older, with women more likely to respond than men. Around 60% of respondents reported owning single-family homes.

Because of the characteristics of respondents mentioned above, additional research must be conducted to better understand the needs of renters with disabilities living in single-family and multi-family settings.

Key findings from the survey to residents with disabilities include:

1. **Residents have multiple access needs, underlining the need for accessible housing that is designed to accommodate a variety of health needs.** Roughly 60% of respondents reported having more than one disability. The most common multi-disability diagnosis (where a person has two or more disabilities simultaneously) included a mobility disability paired with asthma or chronic illnesses such as diabetes, epilepsy, arthritis, or long COVID.
2. **Residents' housing accessibility needs are widely unmet and surveyed residents report accessible bathroom features as highest priority:** More than 50% of respondents stated their home does not meet their accessibility needs. The most needed features included roll-in showers, grab bars, and comfort height toilets. Roughly 33% and 16% of respondents indicated a need for stair gliders and ramps, respectively. Of 112 respondents:
 - About 48% said reaching and opening kitchen cabinets or the refrigerator was difficult because of their disability
 - Nearly 70% said getting in and out of the bathtub or shower was difficult because of their disability
 - Roughly 30% said getting in and out of bed was difficult because of their disability
3. **Cost is a barrier to securing housing that meets residents' needs:** Of those who indicated they did not rent or own a place that had the accessible housing features they need, 70% indicated they could not afford the place they wanted to rent or own. Besides an inability to afford available housing, other challenges experienced by residents when looking for housing that meets their needs include long waitlists, application fees they cannot afford, and property denials because their credit scores are too low.
4. **About half of respondents with disabilities indicated they did not live alone.** Of those who don't live alone, the majority indicated they live with family. The data in

this survey shows accessibility needs exist across housing types and there is a need for a variety of unit sizes to accommodate households of different sizes.

5. **More than half of caregivers reported feeling either very or somewhat unsupported in their roles as caretakers.** The top resources respondents said would make them feel more supported as caretakers were home modifications and assistive technology and financial assistance.

PROPERTY MANAGERS

The Kelsey interviewed 12 property management stakeholders, who managed properties ranging from small portfolios of six units across three duplexes to senior managers overseeing 14,000 units. Most managed primarily subsidized units with some market-rate units mixed in, with some providers housing specific populations such as seniors and veterans. Their developments used a range of funding sources, including Low-Income Housing Tax Credits (LIHTC), HOME affordable housing funds, and Rental Assistance Demonstration (RAD) funds. Key Insights include:

1. **Accessible units in housing developments are not always occupied by residents with disabilities:** Interviews revealed that accessible units are at times occupied by residents who do not require the accessible features. Reasons varied: some property managers noted low demand for these units from disabled residents, while others pointed to processes that fail to prioritize disabled tenants. Although some property management companies have internal transfer policies to relocate non-disabled tenants if a disabled resident needs the unit, this can result in delays for disabled residents to be placed in accessible units. A Michigan Housing Council memo to the Michigan State Housing Development Authority states that data “from some of the largest member organizations of the Michigan Housing Council demonstrate that among the nearly 15,000 represented units, approximately 5.9% are Type A units, yet fewer than half of those ADA units are occupied by ADA households (households requiring ADA accommodations).”²⁶ This misallocation showcases the need to explore how to better match residents with disabilities to accessible units as well as determine if the current housing supply matches the needs of residents with disabling conditions and market demand for these units.
2. **Inconsistent responses to requests for reasonable accommodations or modifications were observed across property managers:** The Kelsey observed significant differences in how property managers handle requests for accessibility changes. Some managers had specific, standardized forms/processes for residents to send accommodation/modification requests. Others deployed more flexible processes responsive to individual cases, but there is often a lack of clear guidance

²⁶ MHC Comments for MSHDA 6-30-23.pdf

for residents on how to request these changes. In these cases, the instruction is simply, "Come into the office and let us know what you need, and we'll figure it out from there," indicating a potential need for a more structured and standardized approach. Smaller property management firms (managing 20 or fewer scattered sites) expressed financial constraints that limit their ability to make necessary changes for accessibility and a lack of understanding of their legal obligations to do so. None of the property managers interviewed voluntarily shared their resident-facing documentation used for the reasonable accommodation/modification process when requested.

3. **Complex application processes pose an additional challenge for residents:**

Property managers interviewed recognized that the rental application process presents challenges for potential residents, including those with disabilities, due to extensive documentation requirements for income verification and leases that are lengthy and filled with legal jargon, making comprehension more difficult. Property managers acknowledged that some procedures, such as annual income verification, are required by the funding source for affordable housing properties.

In response to some of these findings, HRD contracted with Detroit Disability Power to create best practices guides for property managers on how to effectively market units to residents with disabilities and set up systems for reasonable accommodations and modifications. These materials will be distributed to property managers in 2025.

DEVELOPERS, ARCHITECTS & PLANNERS

Partnering with the Urban Land Institute (ULI) Michigan, The Kelsey hosted two roundtables for housing practitioners to discuss accessible housing. There were 44 unique participants in the roundtables. Key insights included:

1. **Practitioners believe there needs to be more adaptability in housing:** Participants at the roundtables and resident listening sessions emphasized the need for more adaptability and diversity of accessible housing features, recognizing that not all disabled individuals require or desire "Type A" units. Residents and developers alike noted demand for simpler, cost-effective modifications, such as grab bars, universal toilets, and the removal of cabinets beneath sinks. Many residents expressed a preference for units that could be customized to meet their specific needs, rather than the "one size fits all" design of "Type A" units.
2. **Housing practitioners are concerned about the perceived costs of accessible housing features:** Noting the market return for housing developments in Detroit is significantly below average, participants indicated this reality creates hesitation to add costs associated with accessibility. One developer noted, "If we can get out of doing elevators and save a project \$100K, that cost saving could make a project

work.” Developers requested support for increased pre-development funding to support expertise in designing for accessibility from the start of the development to ensure long-term cost savings.

3. **Roundtable participants emphasized the importance of educational resources on accessibility:** Key priorities included understanding what accessibility looks like (definitions, terms, visuals); learning appropriate language and sensitivity when talking to or about people with disabilities; connecting better with the disability community; showcasing successful projects and the modifications made; and leveraging existing funding sources for accessibility. They also requested a list of cost differentials for accessibility modifications to inform their planning and budgeting processes. Developers expressed interest in a universal application system for accessible units, which could streamline the process and make it easier to match units with those in need. Developers suggested partnering with the Michigan State Housing Development Authority (MSHDA) on a universal application system for accessible units. Developers also emphasized the need for an easy-to-understand resource guide or webpage provided by a local government entity on tools to increase residential accessibility.

VI. LOCAL ACCESSIBILITY STRATEGIES

The City of Detroit and the State of Michigan have identified affordable housing strategies that aim to increase the amount of accessible housing within affordable housing portfolios. A summary of accessibility strategies and the estimated cost implications for new construction, rehabilitation, and modification follows below.

CITY OF DETROIT

HRD invests federal entitlement funds from the U.S. Dept. of Housing & Urban Development into affordable housing development and preservation projects. HRD has set minimum accessibility requirements that double the federal requirement under Section 504 of the Rehab Act, increasing the required percentage of accessible units from 5% to 10%. HRD gives added preference in the form of points awarded in the competitive application process to developments that offer at least 15% of units as accessible units. The excerpted HRD standards and preference is as follows:

New construction projects receiving funding from this NOFA must have 10% of the units meet the accessibility requirements under Section 504 and an additional 2% of the units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities. Rehabilitation projects receiving funding from this NOFA must have 5% of the units meet accessibility requirements under Section 504 and an additional 2% of the units, or at least one unit, whichever is greater, must be accessible for persons

with hearing or visual disabilities. New construction projects that have 15% and rehabilitation projects that have 10% of the units meet the accessibility requirements under Section 504 will be eligible to receive 2 additional points in the NOFA scoring process.

STATE OF MICHIGAN

Michigan's state housing finance agency, the Michigan State Housing Development Authority (MSHDA), includes accessible housing requirements in its Qualified Allocation Plan, the instrument for allocating Low Income Housing Tax Credits. The 2024-25 QAP states that projects that commit to building a minimum of 15% of the total units as "Type A" units will receive an additional three points to their application scoring for affordable housing funding.²⁷ The remaining units with first floor entry or accessible by an elevator must be Visitable (Type C dwelling units). Type A units are designed for those with a wheelchair. Visitable or Type C units typically have fewer accessible features than Type A units and include a zero-step entrance, wider ground-floor doorways for mobility devices, and basic access to a ground-floor bathroom.

In Michigan's Statewide Housing Plan, it includes strategies to create more accessible housing in the state, including:²⁸

- Promote universal and barrier-free design accessibility, while considering additional space for special needs and equipment and contextual factors (e.g., access to transit and amenities) that influence accessibility and visitability.
- Incentivize increased numbers of accessible units, including for extremely low incomes, in new development projects.
- Increase the accessibility of units for those who are deaf and hard of hearing by providing resources for visual alerts for appliances and smoke alarms, access to high-speed internet service for videophones, renter interpretation services, etc.
- Expand funding opportunities that would allow older adult homeowners and landlords to make modifications to units to support accessibility.

COST IMPLICATIONS OF ACCESSIBLE HOUSING REQUIREMENTS

For the purpose of this study, HRD staff used national construction data and research to estimate the costs of accessible housing features. These cost estimates can be found in the table below.

²⁷ Michigan 2024-25 QAP

²⁸ https://www.michigan.gov/mshda/-/media/Project/Websites/mshda/developers/Statewide-Housing-Plan/MI-Statewide-Housing-Plan_Final-112723.pdf?rev=4f844882abac481faa8f3361138ec189&hash=9C67A0D64FF2CB5AAED6AE607F3B0689

Feature or Unit Type	Estimated Cost
New Construction/Built to comply with Section 504	\$3,000 – \$7,500 per unit for meeting accessibility standards in a new multifamily development. Includes door width adjustments, and accessible kitchens, bathrooms, and common areas
Ramps & Entrance Adjustments	\$5,000-\$30,000
Elevator Installation	\$50,000 – \$150,000+
Accessible Parking & Pathways	\$10,000 – \$50,000
Substantial Building Rehabilitation (75% or More of Replacement Cost)	\$15,000 – \$50,000 per unit, depending on the extent of work required. Costs increase if major structural modifications are needed, such as installing elevators or reconfiguring layouts.
Minor Accessibility Modifications (Non-Substantial Rehab)	\$2,500 – \$15,000 per unit, depending on modifications. Includes adding grab bars, ramps, accessible door hardware, widening doorways, and lowering countertops.
Major Structural Modifications (Historic or Older Buildings)	\$25,000 – \$100,000 per unit for extensive structural work. Costs are higher for elevator retrofits, extensive bathroom/kitchen reconfigurations, or significant path-of-travel alterations.

VII. POLICIES AND PROGRAMS TO ENHANCE ACCESSIBLE HOUSING

Like Detroit, communities across the country are grappling with the question of how to effectively enhance housing options for residents with disabilities. Below are summaries and examples of local strategies to (1) enhance accessibility and design in new housing development and (2) increase accessibility of existing housing stock. HRD will be studying policies and programs across the country to determine their effectiveness in increasing the accessibility of housing supply.

ENHANCING ACCESSIBLE DESIGN IN NEW DEVELOPMENT

1. **Re-evaluate design requirements and potential developer incentives to increase accessible housing in new development.**

Many communities are redesigning and updating standards for accessible housing in housing developments. This includes creating more specific standards for housing projects than what was previously prescribed and integrating these standards into city-wide policies and procedures. Communities are considering how to incentivize and lower the costs of this kind of development, as well as how

to educate and train developers on how to comply with these standards. Communities that have pursued these strategies include the following, however it is notable that many of these are higher cost housing markets where projects may be able to absorb additional costs associated with accessible housing:

- **Los Angeles:** The Los Angeles Housing Department awards significant points in their funding applications for housing projects that incorporate more accessibility. In the Enhanced Accessibility Program, developers get 10 bonus points for their applications.²⁹ Developers must incorporate design elements from a list of identified features.
- **Toronto:** In 2024, the Toronto City Council approved updating the City's Affordable Rental Housing Design Guidelines to include a new set of universal design standards for affordable rental units and a new standard of accessibility for barrier-free units.³⁰ Research conducted to inform these standards showed that it cost 7.7 times more to modify existing properties than to incorporate accessibility and adaptability features during the design stage of developments.³¹
- **Alameda, CA:** The City of Alameda passed a "Universal Design" ordinance, which applies to all new Alameda developments with more than five units and requires 100% of newly constructed units to be universally "visitable" by all and 30% to be universally habitable.³² What this means is that 100% of these units must allow a person with mobility challenges to be able to enter the unit and access a bathroom.³³ Meanwhile, 30% of the units must have an accessible front door leading to an accessible living room, kitchen, bedroom, bathroom, and laundry area on the ground floor.
- **San Antonio, TX:** The San Antonio Housing Trust is a fund established with a \$10 million corpus by the City of San Antonio, governed by a Board of Trustees appointed by the San Antonio City Council, and tasked with creating and preserving affordable housing.³⁴ The Trust recently created Multi-Family Universal Design standards, which applies to all multi-family housing developed in partnership with the Trust.³⁵

²⁹ <https://housing.lacity.gov/enhanced-accessibility-program-eap> and https://housing.lacity.gov/wp-content/uploads/2022/08/Exh_08_LAHD-EAP-Clarification.pdf

³⁰ <https://secure.toronto.ca/council/agenda-item.do?item=2024.PH15.6>

³¹ <https://www.toronto.ca/legdocs/mmis/2024/ph/bgrd/backgroundfile-248678.pdf> and <https://www.toronto.ca/legdocs/mmis/2024/ph/bgrd/backgroundfile-248679.pdf>

³² <https://www.nlc.org/article/2023/08/17/housing-for-individuals-with-disabilities/>

³³ <https://oaklandside.org/2023/06/01/oakland-housing-element-universal-design-accessibility/>

³⁴ <https://sahousingtrust.org/about-us/>

³⁵ <https://sahousingtrust.org/wp-content/uploads/2024/06/SAHT-Universal-Design-Standards-2024.V1.pdf>

2. **Alter zoning code and streamline administrative and legislative procedures to reduce barriers to affordable, accessible housing preservation and production efforts.**

Many communities across the country are focusing on changes to local zoning codes as a response to housing cost, housing affordability, and NIMBY challenges. Zoning changes can remove barriers to housing construction that is accessible to residents with disabilities, such as relaxing setback requirements to allow for ramps.³⁶ It can also expedite the construction of more accessible housing since rehabbing existing structures to enhance accessibility can be more costly and infeasible, depending on the structure.

- **Grand Rapids:** To meet goals to add more than 14,000 new housing units by 2027, the Grand Rapids City Commission passed several zoning reforms last year.³⁷ The zoning changes in part now:
 - Allow accessory dwelling units to be permitted alongside single- or two-family homes, regardless of if those homes are owner-occupied or rentals
 - Allow small-scale single-room occupancy homes in residential districts
 - Reduce requirements for lot area/width for homes with two to six units
 - Eliminate parking requirements for developments of six or fewer units on certain streets in traditional neighborhoods

3. **Leverage public land for innovative incubator initiatives for accessible housing.**

Request for Proposals (RFPs) are used to attract developers to develop targeted parcels of publicly owned land into affordable housing. To enhance accessible housing, some communities have used RFPs to promote universal/inclusive design practices and provide land for innovative accessible housing developments. Through these RFPs, cities can award additional points to proposals that meet specific criteria for accessibility and affordability, or provide basis boosts, which are increases in the eligible basis for LIHTC (allowing developers to claim more tax credits).

- **Boston:** In 2024, the City of Boston released two RFPs totaling \$40 million for affordable housing projects. Through these initiatives, the City encouraged developers to apply universal design principles in their projects.³⁸

³⁶ <https://ada-update.com/2021/02/04/do-zoning-laws-discriminate-against-people-with-disabilities/>

³⁷ <https://www.woodtv.com/news/grand-rapids/gr-makes-significant-changes-to-housing-rules-heres-what-they-mean/>

³⁸ <https://www.boston.gov/news/mayor-wu-announces-40-million-grant-funding-available-affordable-housing>

4. **Offer accessible housing/inclusive design training programs and recognition programs for housing practitioners.**

To help build capacity around accessible housing practices, training and/or recognition programs have been deployed by communities to enhance disability-forward practices. HRD's work with Detroit Disability Power to create public educational materials on this subject for housing practitioners is one way to help build capacity around accessible housing practices.

- **Ferndale, MI:** Ferndale operates a similar awards program for local businesses.³⁹ The Ferndale Accessibility and Inclusion Advisory Commission (FAIAC) awards community leaders who have made noticeable strides to accessibility and inclusion and have gone above and beyond ADA requirements.

ENHANCING ACCESSIBILITY IN EXISTING HOUSING STOCK

1. **Improve data management practices to understand full inventory of accessible housing stock in Detroit.**

To better inform policies and programs to enhance accessible housing, communities have intentionally improved data management practices to compile data on the accessible units that exist in their housing ecosystems. Metrics that are critical to compile include address/unit number of accessible units, the features in each unit, the affordability of accessible units, the time it takes to lease up these units, and if these units are occupied by residents with disabilities. The City of Detroit's affordable housing website, Detroit Home Connect, asks properties to indicate if they possess accessible units.

- **Philadelphia:** The City of Philadelphia's online database of affordable housing units shows where units for residents with disabilities are located.⁴⁰

2. **Enhance standardized practices across the affordable housing portfolio to prioritize accessible units for residents with disabilities.**

The U.S. Department of Housing and Urban Development states that housing developers who receive federal funds must "adopt suitable means" to make sure that information on available accessible units reaches individuals with disabilities. Recipients of funds must first offer accessible units that become available to qualified individuals with disabilities currently residing in a non-accessible unit in

³⁹ <https://d2kbkoa27fdvtw.cloudfront.net/ferndalemi/6db32013f95bdee498d4a0ba1ebdf5cd0.pdf>

⁴⁰ <https://cityofphiladelphia.carto.com/u/phl/builder/79eae9d-e0da-471f-9a41-4272ea5056a2/embed?state=%7B%22map%22%3A%7B%22ne%22%3A%5B40.007894530893125%2C-75.27711868286134%5D%2C%22sw%22%3A%5B40.0792535651165%2C-75.06975173950197%5D%2C%22center%22%3A%5B40.04358338419327%2C-75.17343521118165%5D%2C%22zoom%22%3A13%7D%7D>

the same project. They then should offer the unit to individuals with disabilities on the recipient's waitlist. To ensure residents with disabilities are matched to accessible units, communities can enforce standardized marketing and lease-up guidelines for accessible units that increase access for residents with disabilities when accessible units come online. These guidelines should include partnering with service providers and disability organizations to better understand disabled residents' needs and connect to potential tenants.

- **New York:** NYC Housing Connect operates a separate housing lottery for accessible units with only disabled residents receiving a “ticket”/number for the accessible unit lottery. This ensures accessible units are primarily occupied by residents with disabilities.⁴¹

3. Launch a City fund to support reasonable modifications for residents who rent and cannot afford accessibility alterations for their units.

Since not all housing has accessible housing features, residents with disabilities who rent can ask housing providers for reasonable accommodations or modifications to make their homes easier to use. Reasonable accommodations are changes to policies and procedures, such as giving more time to residents with disabilities to move out. Reasonable modifications are changes to the structure of the housing unit or property, such as asking a housing provider to install a wheelchair ramp at the entrance of the building, installing grab bars in the bathroom, or installing a visual alarm for someone with a hearing disability. Because reasonable modifications involve structural alterations, they tend to be more expensive than accommodations.

Although residents have the right to ask for reasonable modifications, residents often have to pay for the cost of that modification. This can be financially burdensome for residents, especially those with disabilities who are on fixed incomes. One way communities and community organizations address this gap is by creating funds to help pay for those modifications. These programs can especially be impactful because they can assist homeowners and renters, as well as residents who live in publicly funded housing and those who live in private landlord-owned housing. HRD will be launching a fund for resident modifications in the next year. Examples of this type of program include:

- **New York:** The Fair Housing Justice Center, a civil rights nonprofit, provides financial assistance to low- and moderate-income renters with disabilities who need reasonable modifications made to the housing they occupy to make it accessible.⁴² The Fund can be used to pay qualified contractors to make the

⁴¹ <https://housingconnect.nyc.gov/PublicWeb/>

⁴² <https://fairhousingjustice.org/our-work/afhaf/>

requested modifications, or to compensate architects, contractors, and experts who evaluate reasonable modification requests made by clients, inspect housing units, and obtain related cost estimates.

- **Chicago:** Chicago's HomeMod Program provides accessibility modifications for low-income Chicagoans with disabilities.⁴³ Renters and homeowners can both apply, but landlord permission is required for renters.
- **Pittsburgh:** The Urban Redevelopment Authority of Pittsburgh provides grants to assist homeowners with permanent disabilities make accessibility modifications for their homes.⁴⁴ Landlords can also receive assistance. A URA construction advisor conducts home inspections and can send work out to bid.

4. Standardize reasonable accommodation/modification processes across housing developments so resident experience does not differ widely across properties.

Standardizing the accommodation/modification request process across publicly-funded properties is key to ensuring residents are informed of their rights and procedures are clear. One way to standardize this process is to require properties to proactively offer accessibility modifications to all incoming residents, which can remove the burden from individuals who may otherwise need to navigate a complex modification request process. The Kelsey uses an Inclusive Modification approach, where all residents are asked if any accessibility modifications should be added or changed, without the need to submit a formal Reasonable Accommodation/Modification request.

5. Improve the fair housing complaints system and public education efforts about fair housing.

While programs and policies can be created to guide practices of landlords and other property owners, fair housing violations are still likely to occur across a variety of identities, including disability status. To protect residents' rights to housing free of discrimination, fair housing complaints systems and public education campaigns about fair housing should be evaluated for potential improvements.

6. Continue accessibility repair programs for homeowners.

The City of Detroit used some of its American Rescue Plan Act Plan allocation to launch a Detroit Home Accessibility Program in partnership with CHN Housing Partners and Detroit Disability Power. This program provides eligible Detroit residents with grant-funded modifications to the entries and exits of their homes to

⁴³ https://www.chicago.gov/city/en/depts/mopd/provdrs/hous/svcs/accessible_home_modificationprogram-ages0-5911.html

⁴⁴ <https://www.ura.org/pages/home-accessibility-program-for-independence>

make them safer to access.⁴⁵ The City's forthcoming Critical Home Repair Program will also cover accessibility-related repairs for homes that have emergency health and safety issues.

VIII. CONCLUSION & NEXT STEPS

Through the analysis and engagement conducted in the production of this report, it is evident that there continues to be a large population—in both number and percentage—of Detroit residents that have one or more disability. Resident experience and limited available housing accessibility data indicate that residents' housing accessibility needs are not being met by the current housing stock.

Federal laws such as the Fair Housing Act and Section 504 of the Rehabilitation Act have been instrumental in increasing housing accessibility in the United States, however since most of the Detroit's housing was built prior to these laws and the laws are limited in scope, local action is needed to close the accessible housing gap. Addressing accessible housing needs in Detroit will require a combination of improving accessibility of existing housing units and encouraging heightened accessibility in new housing developments. Engagement with residents and housing developers emphasized that efforts to encourage accessibility must be done thoughtfully and deliberately so as not to drive up costs that reduce affordability or mandate accessibility features that do not align with resident needs.

There are many local advocates and housing stakeholders that have expressed desire to advance accessible housing practices in Detroit, drawing on both best practices from other communities and locally derived solutions. HRD and collaborating City departments will seek to encourage and support accessible housing practices in 2025-2026 through the following actions:

- Continue to require accessible housing units in developments receiving Federal pass-through funds at percentages double what is required by law and awarding preference to housing developments that further exceed these targets.
- Distribute accessible housing educational materials to residents, developers, and property managers to promote adherence to accessibility laws and best practices.
- Design and launch a program for renters to fund accessibility modifications to their rental units.
- Design and launch a Critical Home Repair Program that will in part provide accessibility-related repairs to homeowners with critical health and safety needs.
- Improve the availability and quality of accessible housing unit data.
- Conduct best practices and policy research to reevaluate accessible design standards for housing developments in Detroit.

⁴⁵ <https://chnhousingpartners.org/detroit/dhap/>