Designated Housing Plan

Submitted to:
U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

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DHC
DETROIT HOUSING COMMISSION

Introduction

DHC is requesting to designate 9 Developments with 1,212 existing ACC units or 35.6% of DHC's portfolio as designated *Elderly Families Only* (Elderly is 62 yrs. and older). The Detroit Housing Commission (DHC) (MI001) is submitting this Designated Housing Plan (DHP) to the United States Department of Housing and Urban Development (HUD) pursuant to authorization by Section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) Authority to Provide Designated Housing and the requirements of HUD PIH Notice 97-12. PIH Notice 2005-2 (HA) explains the requirements by which a public housing agency (PHA) can, pursuant to Section 10(a) of the "Housing Opportunity Program Extension Act of 1996," designate public housing projects for elderly families only, disabled families only, or elderly and disabled families.

The information contained in this DHP provides justification that DHC's designations are necessary to achieve the housing goals/priorities identified by the City of Detroit (CoD) in their 2020-2025 Consolidated Plan for Housing and Community Development (CoD Consolidated Plan); and servicing the growing need for affordable, age-appropriate housing among Detroit's low-income, elderly population.

A few excerpts detailing the need and prioritization of elderly housing per the CoD Consolidated Plan are as follows:

- Section SP-25 Priority Needs - 91.215(a)(2) Priority Needs Summary, Priority 2 is the "Increase in affordable rental housing options" which is designated as "High" and identifies "Elderly" and "Frail Elderly" as target populations. It aims to "increase the availability of new, as well as the preservation of existing, single family and multi-family rental housing for low-to-moderate-income households."

- "Single person households, the **elderly**, and persons with disabilities have a need for affordable housing with cost burden one of the most common housing problems for residents. A significant need exists for renters and owner-occupied **affordable housing**, especially low and extremely low-income households. The low incomes translate directly into housing problems and poverty level are high and widespread."

- "Another group of households in need of housing assistance are seniors (65-years and older) of which there are 59,843 households. Additionally, seniors tend to live on fixed incomes, have a higher rate of disability, and higher healthcare costs."

- Currently, there are substantial unmet housing needs for elderly persons with disabilities in the City of Detroit. Per the CoD Consolidated Plan," 46% or 38,499 individuals over the age of 65 have a disability."

DHC's Plan is, therefore, designed to ensure that reasonable efforts are undertaken to address the needs of the elderly populations in a fair and equitable manner. While the Plan will designate certain developments for occupancy by elderly families only, there will still be significant housing opportunities available for non-elderly families.

II. Commitment to Non-Discrimination and Fair Housing

With the implementation of this Plan and the administration of all programs, DHC's application and operation of designated housing projects shall be in conformity with the regulations of 945.301 Subpart C, and the regulations applicable to DHC in 24 CFR Chapter IX, including 24 CFR parts 913, 960 and 966, and, in particular, the nondiscrimination requirements of 24 CFR 960.211 (b)(3), that includes but are not limited to section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), Fair Housing Act (42 U.S.C. 3601-3619), title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), Age Discrimination Act (42 U.S.C. 6101-6107), the American with disabilities Act (42 U.S.C. 12101-12213) and the implementation of these statutes and authorities; and other applicable Federal, State, and local laws prohibiting discrimination and promoting equal opportunity.

Based on a review of existing tenant and waiting list information, DHC has determined that the designations described herein will have no adverse impacts in terms of increasing concentrations of minorities in DHC housing developments.

III. Accessible Housing

Accessible units are defined as those housing units owned or managed by DHC which have been physically modified to meet the needs of persons with disabilities and which conforms to the physical requirements under Section 504 of the Rehabilitation Act of 1973. Within those developments which DHC designates for occupancy by elderly families only, accessible units shall be made available only to elderly families or elderly individuals on the waiting list.

IV. Priority for Occupancy

In the event that DHC determines there are insufficient Elderly families

V. Duration of Plan and Extensions

DHC Designated Housing Plan shall be in effect for a five-year period from the date of HUD's notification that the Plan has been approved. Per the statutory provisions (Section 7 (e) (1)) requires that HUD "...notify each public housing agency submitting a plan whether the plan complies...not later than 60 days after receiving the plan. If...(HUD)...does not notify the public housing agency..., the plan shall be considered...to comply...and...(HUD)...shall be considered to have notified the agency of such compliance upon the expiration of such 60-day period." DHC may amend its Plan before the expiration of the five-year period by submitting a revised Plan to HUD. DHC may submit a renewal “for additional two (2) year increments.” The DHC is requesting a five-year designation.

V. Sources of Information

In preparing this Plan, DHC conducted an investigation and analysis of housing data, community trends, community priorities, various needs assessments, and demographic data including:

- The City of Detroit's Consolidated Housing Plan.
- Characteristics of existing DHC public housing residents.
- Information on DHC current vacancies, unit assignments, turnover and transfers.

- An analysis of the ratio of elderly families in DHC housing compared to elderly families in need of housing.
- Characteristics of applicants on DHC's current public housing waiting lists, including an analysis of the number and percentages of persons with disabilities and near-elderly and elderly families on these lists.

In addition, DHC consults and collaborates on a regular basis with a wide range of advocacy groups and public and private agencies who work with elderly families and families with disabilities.

VI. Justification for Designation

DHC's Plan to designate certain developments for occupancy by elderly families only is in compliance with all applicable laws and HUD regulations and is justifiable given the continuous community needs and priorities.

Analysis of current and past waitlist trends has demonstrated that most Elderly and Near-Elderly applicants are requesting to be housed in a 1-bedroom unit. The vast majority of Non-Elderly Families applied for 2-bedroom or more units. This was reflected during the analysis of a January 2023 closed waitlist and more recently when DHC re-opened its waitlists. Per the data table below, please note the following:

- 69% of Elderly applicants requested a 1-bedroom unit,
- 68% of Near-Elderly applicants requested a 1-bedroom unit,
- 27% of Non-Elderly applicants requested a 1-bedroom unit, and
- Only 55 2-bedroom units and no 2, 3, 4, 5, or 6-bedroom units in the designated sites.

Bedrooms in Unit	Elderly	Near-Elderly	Non-Elderly
One	69%	68%	27%
Two	28%	29%	56%
Three	3%	3%	16%
Four	0%	0%	2%
Five	0%	0%	0%
Six	0%	0%	0%

Unit Size Requested - % of Applicants

On April 30, 2012, DHC's Board of Commissioners approved Resolution 2542 which authorized DHC to submit a DHP to HUD to designate the nine sites in this DPH as elderly only units. HUD approved that plan which expired in July 2017. DHC decided to amend and further expand the DHP and submitted Resolution 2899 on March 23,2017, to its Board; which the DHC Board of Commissioners approved. HUD approved this new and expanded DPH. That designation expired in 2022, but the developments continue to house elderly and near elderly households. The community continues to perceive the developments as senior serving communities.

- As a result of the 10 years of Elderly Families Only designation, the nine designated developments have become senior communities.

- The DHC Resident Services Department (RSD) tailors its services and programs to the demographics and needs of the residents at each development.

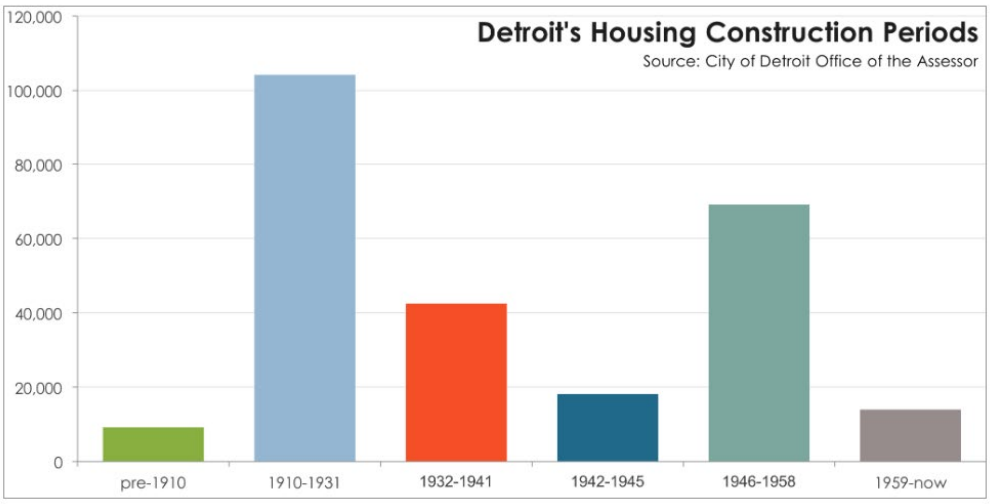
- As a result of the nine sites being previously designated Elderly Families Only, RSD has developed *a very robust senior-focused partnerships, services and programs.* Examples below:
    - Health and Wellness Programs and Services:
        - DAAA – (Elderly Only)
        - PACE– (Elderly Only)
        - St Patrick Senior Center– (Elderly Only)
    - Family and Community Supportive Services:
        - Focus Hope– (Elderly Only)
        - North American Senior Benefits – (Elderly Only)

DHC's current public housing resident population consists of a total of over 2,490 households, of which 43% are Elderly (age 62+), 22% Near-Elderly (age 50 – 61). Over 49% are disabled and most of the disabled residents are Elderly.

- The units at the nine sites are designed to accommodate senior individuals. Even the non-ADA units have features that enhance elderly residents' quality of life. For example,
    - Larger bathrooms, lower light switches, shower/bathtub bar handles, call cords, intercom systems, elevators, and onsite community centers.

According to the Census Bureau's 2022 *American Community Survey 1-year Estimates* approximately 15.4% of Detroiters are 65 years and older. The 2022 U.S. Census data reported that the citizens that DHC aims to serve represented 21% (age 60+) and 12% (age 50-59) of the total Detroit population. Furthermore, approximately 20% of the people living below the poverty line are aged 65 and over. The U.S. Census' 2000 Summary File titled *Household Population and Household Type by Tenure (Geographic Area: Detroit, MI)* indicates that: renter occupied housing units by residents 65 years or older (non-family household units) was 12,998 or 8.6%.

Approximately half of Detroit's housing stock is occupied by renters, thus proving affordable rental properties are imperative. In addition, according to Detroit Area Agency on Aging Senior Housing Report (DAAA): It was found that many of the housing needs of the elderly were related to having a high percentage of "older adults" living in a large urban area with a high percentage of "older" housing stock. The 2017 DHC DHP reported that in 2022, 85% of the City of Detroit housing stock is 40 years old compared to 51.7% for the nation). Data Driven Detroit reported that "By 1956, more than 95% of homes currently in the city had been built". The elderly are living in older homes that require extensive home repairs and a significant portion of this population is unable to make these repairs because of physical limitations and they report having limited financial resources to hire contractors to make the repairs.



A Community Need Assessment conducted by the DAAA and Wayne State University in 2020 further reported that "nearly one in five seniors overall (19.7%) reported that 'keeping up my home and apartment' was a 'very serious problem', and a roughly equal proportion (19.0%) reported that 'paying for utilities' was a 'very serious problem'." This assessment also found that " the second most noted trend is the need to create 'age friendly' livable communities that address caregiving and housing needs." Designated housing is still high necessity for the elderly and near-elderly population.

DHC has long housing request waiting lists, which is further indication of the need for housing that is affordable. Attached with this application is a snapshot of the DHC waiting lists. It is a snapshot because DHC is actively assessing applicants on the list and housing eligible applicants.

VII. Unit Breakdown of Designated Projects

Upon approval of this Plan, the following DHC developments are designated for occupancy by Elderly Families Only:

Development	AMP #	Program	ACC Units	1 BR	2 BR
Forest Park	MI001000003	LIPH	97	96	1
Riverbend	MI001000011	LIPH	95	90	5
Sheridan Place I & II	MI001000015	LIPH	409	407	2
Warren West	MI001000018	LIPH	143	116	27
Woodbridge Senior Village	MI001000019	LIPH	296	283	13
Gardenview Estates IIIC	MI001000085	Mixed-Finance	42	38	4
Gardenview Estates IIID	MI001000089	Mixed-Finance	41	38	3
Woodbridge Senior Enhanced	MI001000072	Mixed-Finance	50	50	0
Woodbridge Estates IX	MI001000020	Mixed-Finance	39	39	0
Current Developments Total			**1212**	**1157**	**55**

VIII. Supportive Services

A range of supportive services are available at all DHC developments. The services vary by site, and they are based primarily on the needs and desires of residents. DHC is continually working with residents and

community partners in developing an appropriate mix of supportive services at all sites. The sites to be designated under this Plan as for elderly families only have supportive services geared particularly to the needs of the elderly. A listing of supportive services by site is included as Attachment B.

IX. Treatment of Current residents of Designated Projects

Note - Currently the developments that are being requested to be designated were previously designated. DHC does not anticipate the need to relocate any current residents.

No resident who is lawfully residing in a DHC dwelling unit will be evicted or otherwise required to vacate because of the designations described in this Plan.

DHC residents may request or agree to be relocated in connection with this designation. In such cases, DHC will provide:

a. A notice of the designation and an explanation of relocation benefits,
b. DHC will work with the residents wishing to relocate to identify an appropriate unit within DHC general occupancy portfolio, and
c. Payment of actual, reasonable moving expenses as defined by DHC policy.

X. Eligibility of Near-Elderly Families

In the event that there are insufficient elderly applicants to fill all of the units in the elderly only designated developments listed above, DHC shall allow "Near-Elderly" families or individuals to occupy units in these developments. A "Near-Elderly" family is defined as a family whose head, spouse or sole member is at least 50 years but less than 62 years of age.

XI. Alternative Housing Resources

This Plan ensures that there will continue to be a broad range of alternative housing resources available for non-elderly disabled families. The developments designated for occupancy by elderly and near-elderly families represent 35.6% of existing DHC housing resources. Therefore, a majority of all DHC housing resources will be made available for occupancy by non-elderly persons.

- DHC is currently in the process of developing additional non-elderly designated housing units at two of its sites:
  - Gardenview: Up to 200 additional units, and
  - The Village of Parkside: Over 150 additional units.

- The DHC provides additional housing through project-based vouchers (PBVs):
  - DHC is actively pursuing additional housing through PBVs. There are currently multiple commitments to enter into Housing Assistance Payments Contract, Applications for Housing Assistance Payments Contracts, and Housing Assistance Payments Contracts

- DHC works collaboratively with the City of Detroit via an MOU through an emergency voucher program to house families in emergency situations.

- DHC has ACC units available through its Mixed-Finance relationships that are not designated. Only 20 out of the 24 developments are non-elderly designated.

Development	AMP Number	Program	Total ACC Units	0-BR	1-BR	2-BR	3-BR	4-BR	5-BR	6-BR
Emerald Springs 1A	MI001000041	Mixed-Finance	39	0	0	21	13	5	0	0
Emerald Springs 1B	MI001000042	Mixed-Finance	36	0	0	18	14	4	0	0
Emerald Springs II	MI001000043	Mixed-Finance	30	0	2	17	8	3	0	0
Cornerstone Estates 7A	MI001000051	Mixed-Finance	39	0	3	24	8	4	0	0
Cornerstone Estates 7B	MI001000052	Mixed-Finance	60	0	0	27	23	10	0	0
Cornerstone Estates 7C	MI001000053	Mixed-Finance	39	0	0	27	10	2	0	0
Woodbridge Estates IX	MI001000054	Mixed-Finance	39	0	39	0	0	0	0	0
Woodbridge X	MI001000055	Mixed-Finance	14	0	0	8	6	0	0	0
Woodbridge Estates II	MI001000071	Mixed-Finance	22	0	2	17	3	0	0	0
Woodbridge Estates III	MI001000073	Mixed-Finance	13	0	4	8	1	0	0	0
Woodbridge Estates IV	MI001000074	Mixed-Finance	15	0	6	7	2	0	0	0
Woodbridge Estates V	MI001000075	Mixed-Finance	20	0	6	13	1	0	0	0
Gardenview Estates I	MI001000077	Mixed-Finance	48	0	0	11	37	0	0	0
Gardenview Estates IIA	MI001000080	Mixed-Finance	22	0	8	5	9	0	0	0
Gardenview Estates IIB	MI001000081	Mixed-Finance	22	0	9	6	7	0	0	0
Gardenview Estates IIC	MI001000082	Mixed-Finance	24	0	5	11	8	0	0	0
Gardenview Estates IIIA	MI001000083	Mixed-Finance	27	0	0	11	15	1	0	0
Gardenview Estates IV	MI001000084	Mixed-Finance	27	0	5	16	6	0	0	0
Gardenview Estates V	MI001000086	Mixed-Finance	30	0	4	21	5	0	0	0
Gardenview Estates IIIB	MI001000087	Mixed-Finance	25	0	5	6	13	1	0	0
		Total	**591**	**0**	**98**	**274**	**189**	**30**	**0**	**0**

- Additional alternative housing information is in the attached Excel workbook.

XII. Commission Approval

A copy of the Resolution approving submittal of this Plan is enclosed (Attachment C).

XIII. Contact Person

The contact person at the Detroit Housing Commission for questions or additional information on this Designated Housing Plan is:

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Attachment A: Tables

TABLE 1: Unit Comparison (Designated vs General Occupancy Developments)

Designated DHC ACC Units		
Development	**DHC Units**	**Percentage**
Designated	1,212	35.6%
General Occupancy	2,191	64.4%
Current Developments Total	**3,403**	**100.0%**

TABLE 2: Bedroom Breakdown at Designated Developments

Development	AMP #	Program	ACC Units	1 BR	2 BR
Forest Park	MI001000003	LIPH	97	96	1
Riverbend	MI001000011	LIPH	95	90	5
Sheridan Place I & II	MI001000015	LIPH	409	407	2
Warren West	MI001000018	LIPH	143	116	27
Woodbridge Senior Village	MI001000019	LIPH	296	283	13
Gardenview Estates IIIC	MI001000085	Mixed-Finance	42	38	4
Gardenview Estates IIID	MI001000089	Mixed-Finance	41	38	3
Woodbridge Senior Enhanced	MI001000072	Mixed-Finance	50	50	0
Woodbridge Estates IX	MI001000020	Mixed-Finance	39	39	0
Current Developments Total			**1212**	**1157**	**55**

TABLE 3: Unit Breakdown at General Occupancy Developments

Development	AMP Number	Program	Total ACC Units	0-BR	1-BR	2-BR	3-BR	4-BR	5-BR	6-BR
Emerald Springs 1A	MI001000041	Mixed-Finance	39	0	0	21	13	5	0	0
Emerald Springs 1B	MI001000042	Mixed-Finance	36	0	0	18	14	4	0	0
Emerald Springs II	MI001000043	Mixed-Finance	30	0	2	17	8	3	0	0
Cornerstone Estates 7A	MI001000051	Mixed-Finance	39	0	3	24	8	4	0	0
Cornerstone Estates 7B	MI001000052	Mixed-Finance	60	0	0	27	23	10	0	0
Cornerstone Estates 7C	MI001000053	Mixed-Finance	39	0	0	27	10	2	0	0
Woodbridge Estates IX	MI001000054	Mixed-Finance	39	0	39	0	0	0	0	0
Woodbridge X	MI001000055	Mixed-Finance	14	0	0	8	6	0	0	0
Woodbridge Estates II	MI001000071	Mixed-Finance	22	0	2	17	3	0	0	0
Woodbridge Estates III	MI001000073	Mixed-Finance	13	0	4	8	1	0	0	0
Woodbridge Estates IV	MI001000074	Mixed-Finance	15	0	6	7	2	0	0	0
Woodbridge Estates V	MI001000075	Mixed-Finance	20	0	6	13	1	0	0	0
Gardenview Estates I	MI001000077	Mixed-Finance	48	0	0	11	37	0	0	0
Gardenview Estates IIA	MI001000080	Mixed-Finance	22	0	8	5	9	0	0	0
Gardenview Estates IIB	MI001000081	Mixed-Finance	22	0	9	6	7	0	0	0
Gardenview Estates IIC	MI001000082	Mixed-Finance	24	0	5	11	8	0	0	0
Gardenview Estates IIIA	MI001000083	Mixed-Finance	27	0	0	11	15	1	0	0
Gardenview Estates IV	MI001000084	Mixed-Finance	27	0	5	16	6	0	0	0
Gardenview Estates V	MI001000086	Mixed-Finance	30	0	4	21	5	0	0	0
Gardenview Estates IIIB	MI001000087	Mixed-Finance	25	0	5	6	13	1	0	0
		Total	**591**	**0**	**98**	**274**	**189**	**30**	**0**	**0**

DHC General Occupancy Developments		
Development	**AMP #**	**ACC Units**
Algonquin	MI001000028	12
Brewster Homes	MI001000001	250
Cornerstone Estates	MI001000051 MI001000052 MI001000053	138
Diggs Homes	MI001000052	104
Emerald Springs	MI001000041 MI001000042 MI001000043	105
Gardenview Estates	MI001000077 MI001000080 MI001000081 MI001000082 MI001000083 MI001000087 MI001000084 MI001000086	225
Greenbrooke Manor	MI001000029	32
Harriet Tubman	MI001000007	200
The Villages of Parkside	MI001000065 MI001000009	276
Scattered Sites West	MI001000012	77
Scattered Sites East	MI001000013	81
Scattered Sites Central	MI001000014	49
Smith Homes	MI001000016	156
Sojourner Truth	MI001000002	186
State Fair	MI001000017	200
Woodbridge Estates	MI001000020 MI001000071 MI001000073 MI001000074 MI001000054 MI001000075 MI001000055	100
Total		**2,191**

Attachment B: Supportive Services by Type of Development

The following services are provided by DHC Resident Services Department — Resident Opportunity Self Sufficiency (ROSS), Family Self Sufficiency (FSS), Jobs Plus (JP) & YouthBuild (YB). The below services are specified by Family and Elderly sites:

Family & Elderly Designated Site Services:

Health and Wellness Programs and Services: Family & Elderly Sites

- ABC Vision
- Aetna
- American Cancer Society
- Blue Cross Complete
- CARN
- CNS Healthcare
- Team Wellness
- Detroit Health Department
- Humana
- Gilda's Club
- GrindTime Fitness
- Karmanos Cancer Institute
- Oak Street Health
- Purpose 4 Life **– Family Only**
- Team Wellness Center
- United Healthcare Community Catalyst
- Detroit Community Care Network

Workforce Development Services: Family Sites

- The Youth Connection
- Emerging Industries Training Institute (EITI)
- MHT "M" Center Trade School
- Detroit Pizza Bar
- Computer Networking Center
- Express Employment Professionals
- Focus Hope
- Frog Tutoring
- CWA Local 4100
- Department of Labor (DOL)
- Detroit at Work
- Detroit Change Initiative
- Goodwill Industries
- Greening of Detroit
- Housing and Urban Development (HUD)
- Lakeshore Legal
- Michigan Rehabilitation Services (MRS)

- SER-Metro
- Street Court Democracy
- Wayne County Community College District

Family and Community Supportive Services: Family & Elderly Sites

- Genesis House
- The Youth Connection
- Detroit Champions for HOPE
- Gleaners
- Detroit Metropolitan Diaper Bank
- Detroit Police Department
- DTE
- Detroit Public Library
- Detroit Public School Community District (DPSCD)
- DSO
- Michigan State University Extension
- Mosaic Youth Theatre
- National Book Foundation
- Santa For A Day

Homeownership Program and Community Services: Family Sites

- City of Detroit
- Housing Revitalization Dept
- Planning and Development
- BSEED
- GSD
- DPW
- DLBA
- Huntington Bank
- Wayne Metro Community Action Agency Tax Prep/Fin Literacy/Homeownership Training
- MSHDA
- NACA – Homeownership Training

Community Internet and Digital Inclusion Services: Family & Elderly Sites

- Comcast-Xfinity
- Connect Homes USA
- Human IT
- Microsoft
- 123 Net

Elderly Designated Site Services:

Health and Wellness Programs and Services:

- DAAA – (Elderly Only)
- PACE– (Elderly Only)
- St Patrick Senior Center– (Elderly Only)

Family and Community Supportive Services:

- Focus Hope– (Elderly Only)
- North American Senior Benefits – (Elderly Only)