

THE HOUSING AUTHORITY OF THE TOWN OF VERNON

FRANKLIN PARK WEST
NEW ELDERLY-ONLY DESIGNATED HOUSING PLAN

Submitted to:

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Introduction

The 1974 Housing and Community Development Act (HCDA) codified the definition of an elderly family to include disabled heads of household. This legislation allowed non-elderly, disabled families to reside in buildings that were once exclusively available to low-income elderly. Previously the Housing Authority of the Town of Vernon submitted a Designated Housing Plan for the Franklin Park West and Court Towers Apartments to the U.S Department of Housing and Urban Development (HUD). This designated housing plan requested designation of the Franklin Park West and Court Towers Apartments for elderly-only. In July, 2000 the Designation was approved by the U.S. Department of Housing and Urban Development, Special Application Center. The designation of Franklin Park West and Court Towers Apartments as elderly-only lapsed and at that time the Vernon Housing Authority failed to request renewal therefore the Apartments returned to allowing elderly and disabled residents. After discussions with HUD, the Housing Authority of the Town of Vernon is requesting approval of a “New” designated housing plan with Franklin Park West Apartments as an elderly-only development.

The Housing Authority of the Town of Vernon’s “New” designated housing plan for elderly-only residents has been prepared in accordance with Section 7 of the U.S. Housing Act of 1937 which was amended by Section 10 (a) of the Housing Opportunity Extension Act of 1996 and with the U.S. Department of Housing and Urban Development (HUD) PIH Notice 2005-2 (HA) issued on January 5, 2005 and extended through PIH Notice 2010-28 (HA) issued on July 30, 2010. Item II of this notice states “A PHA must submit a designated plan for HUD’s approval in order to formally designate a project for elderly families only ...”.

Furthermore, this Designated Housing Plan for Elderly-Only is also prepared pursuant to 24 CFR, Part 945 – Designated Housing – Public Housing Designated for Occupancy By Disabled, Elderly, or Disabled and Elderly Families. Subpart B – Application and Approval Procedures. Note that Section 945.201 (a), Designated Housing for Elderly Families does not preclude a PHA from providing a designated housing plan for elderly-only housing. It is a recognized best practice to submit a formal Designated

Housing Plan for Elderly-Only if the Housing Authority wishes to designate housing with an elderly-only population. This practice is most recently re-affirmed by the Notice of Proposed Information Collection for Public Comment concerning requirements for Designated Housing, issued on August 26, 2010. This notice describes the need for this information to be collected due to the requirement to submit a plan to designate a project or portion of a project for elderly and/or disabled families.

In accordance with Section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e), as amended; and in compliance with 24 CFR 945.203(c) and in response to the housing needs and goals established by the Housing Authority of the Town of Vernon the Housing Authority is submitting an application requesting designation of Franklin Park West (64 unit project located at 114 Franklin Park West, Vernon, CT) Apartments, as housing for Elderly residents only.

A. Justification for Designating Franklin Park West Apartments as Elderly Only

The Franklin Park West Apartments, along with Court Towers Apartments, was previously designated as elderly-only in July 2000. Due to the Housing Authority of the Town of Vernon not making a timely request to extend elderly-only designation both properties reverted back to allowing elderly and non-elderly disabled tenants.

1. Presently the Housing Authority of the Town of Vernon would like to pursue elderly-only housing designation for Franklin Park West Apartments. Pursuant to 24 CFR, Part 945, Subpart B., Section 945.203 the Housing Authority has addressed the following under consultation in “new” plan development:
 - a. State or unit of general local government.
Consulted with Mayor of Vernon – The Mayor supports the “New” Elderly-Only Designated Housing Plan for Franklin Park West Apartments. No negative comments were received.
 - b. Public and private service providers/Advocacy groups.
As part of the development process public and private service providers /advocacy groups were contacted by letter informing them of the proposed “new” designation

plan. The letter briefly explained the plan and solicited their comments. No comments were received. The following private and public service providers and advocacy organizations are consulted on a regular schedule or as needed by residents of all housing authority properties:

Community Health Resources

Genesis Health Care

AARP Connecticut

CT Department of Social Services

Vernon Senior Center

Vernon Social Service Department

Community Renewal Team

Hockanum Valley Community Council

Corporation for Independent Living

North Central Area Agency on Aging

Vernon Manor Health Care Center

Visiting Nurses and Health Services of CT, Inc.

c. Resident/Public Comments.

As part of the development process residents of the Franklin Park West Apartments were contacted by letter informing them of the proposed “new” designation plan. The letter briefly explained the plan and solicited their comments. Forty (40) out of sixty-four (64) units responded all with favorable responses.

d. Resident councils/Resident management corporations.

No resident councils or resident management corporations exist at the Vernon Housing Authority properties.

Copies of letters sent to the above groups notifying them of the “New” Elderly-Only Designated Housing Plan are attached. The Housing Authority will issue a public notice and make the “New” Elderly-Only Designated Housing Plan available for public comment and will conduct at least one (1) public hearing concerning the “new” plan. All comments received, whether in writing or verbally at the public hearing, will become part of the “New” Elderly-Only Designated Housing Plan submitted to the U.S. Department of Housing and Urban Development.

The Housing Authority has determined that the Designated Housing Plan for Elderly-Only at the Franklin Park West Apartments is consistent with the 2010-2015 State of Connecticut Consolidated Plan for Housing and Community Development and Elderly Housing Demands and Market Growth Patterns.

OVERVIEW

As required by, Title 24, Part 91, Section 91.315 of the Code of Federal Regulations (CFR), the 2010 – 2015 State of Connecticut Consolidated Plan for Housing and Community Development describes the state’s strategic goals and objectives and proposed actions to address issues related to:

- affordable housing;
- public housing;
- homelessness;
- other special needs; and
- non-housing community development needs.

In addition, this section of the State’s Consolidated Plan addresses issues related to:

- community revitalization;
- barriers to affordable housing;
- lead-based paint hazards;
- the state’s anti-poverty strategy;
- the state’s institutional structure;
- coordination among state agencies and with other interested parties, both public and private; and
- low-income housing tax credit use.

Elderly and Frail Elderly

Objective 1: Create a continuum of affordable housing with support services and increase the supply of permanent supportive housing so that people with disabilities can live independently within their community of choice.

Output:

- The number of support services provided to client populations is increased and the accessibility of services by client populations is increased.

- The number of supportive housing units in the state is increased.

GEOGRAPHIC DISTRIBUTION & RELATIVE PRIORITY			
Objective	Funding Source	Targeted Population	Geographic Target
Objective 1	State	Low-Mod Income	State-Wide
Objective 2	State	Low-Mod Income	State-Wide
Objective 3	State	Low-Mod Income	State-Wide

Outcome:

- New/Improved Affordability.
- Elderly and frail elderly persons are able to live within their community of choice in quality, accessible, affordable housing.

Indicator(s):

- Number of support services provided to client population.
- Number of clients being served by each program.
- Number of clients receiving multiple services.
- Year over year change in number of clients being served.

Objective 2: Increase the number of elderly and frail elderly clients served by DSS.

Output: Increase client caseload by ten per year.

Outcome: More elderly and frail elderly state residents will receive assistance and be able to live independently longer with a higher quality of life.

Indicator(s): Number of new client cases managed.

Priority Rationale

Connecticut has an aging population. In 2008, the number of homeowners 65 years old and older totaled almost 220,000 and there

were almost 73,000 renters. The elderly population faces many challenges; the greatest is living independently and on a fixed income after retirement. This demographic is typically income-constrained, yet is forced to absorb increases in taxes, housing prices, and medical care costs. Demographic projections predict an astronomical increase in the elderly population in decades to come. The Connecticut State Data Center predicts a 72% increase in the population age 65 and older, compared to a 3% *decline* in the population ages 20-64 from 2005 to 2030.

Obstacles to Meeting Underserved Need

A major obstacle is keeping up with the demand for elderly housing as the eligible population increases. One of the greatest obstacles to elderly housing and services is the limited availability of state and federal resources. Unfortunately the need for elderly housing and services far exceeds the state and federal financial resources available to address them.

1. The 2010-2015 State of Connecticut Consolidated Plan for Housing and Community Development identifies the following relating to Elderly and Frail Elderly

Objective: Create a continuum of affordable housing with support services and increase the supply of permanent supportive housing so that people with disabilities can live independently within their community of choice.

Projected Outcomes;

- New/Improved Affordability
- Elderly and frail elderly persons are able to live within their community of choice in quality, accessible, affordable housing
- More elderly and frail elderly state residents will receive assistance and be able to live independently longer with a higher quality of life.

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2. The 2010-2015 State of Connecticut Consolidated Plan for Housing and Community Development identifies the following related to Elderly.

- A. As Connecticut's elderly population continues to grow there will be a need for increased attention to the special housing circumstances and needs of the elderly. The State's elderly population is tremendously diverse in its housing preferences, financial characteristics, and health status. What census data shows is that the elderly who are most in need of housing assistance are the low-income renter households. Elderly renters, many of whom are on fixed incomes, find that they cannot keep pace with the escalating rental rates. This results in an increasing cost burden, which reduces disposable income that could be targeted towards other necessary living expenses. These households are concentrated in the State's larger urban areas. Low-income elderly persons are drawn to more developed areas of the state opposed to more rural settings for several reasons. These areas contain more accessible services such as medical care, pharmacies, food stores, and public transportation systems.

The needs of the disabled population are much the same as the general population, but because housing options and the supportive services necessary to establish and maintain independence are in such short supply, many citizens languish in institutional settings. Basic needs include:

- a decent, affordable, safe place to live, with the choice of where and with whom to live made by the individual.
- a residence which is truly a home (i.e. a house or apartment which either belongs to the individual, his/her family, or to a landlord to whom rent is paid).
- the opportunity to develop relationships with other community members (i.e. to be not just physically present in the community but to be truly a part of the community).

Additional needs relating specifically to individuals with disabilities include:

- Transportation: Many individuals do not own automobiles and so accessible bus service as well as paratransit services (demand-response) is needed.
- Access to education, training, and employment opportunities.

Specific needs of individuals with mobility impairments are identified as follows:

- Accessible homes. Some individuals will need full accessibility (i.e. sufficient clear floor space, openings under sinks and lavatories, grab bars around toilet and bathtubs/showers, roll in showers, lowered switches, appliances, etc.).
- Support services. Many individuals with severe mobility impairments will need support services to be successful in the living arrangements they choose; for example personal assistance services (i.e. help with dressing, bathing, meal preparation, etc.) may be required two to four hours a day, or in the case of an individual with a very severe disability, virtually 24/7.

This “new” designation of 64 elderly units as “elderly only” is being submitted to HUD and indicates they are addressing the rental needs of extremely low and very low income renters as well as complying with the housing goal set forth in the State Consolidated Plan by giving non-elderly disabled tenants additional options (section 8 vouchers upon availability) while addressing the housing needs of the elderly. The strategies identified

in the State Consolidated Plan will be addressed by this submittal along with the availability of Section 8 Housing Vouchers.

- B. The Housing Authority of the Town of Vernon through its allocation of Section 8 Housing Vouchers increased the number of assisted units in Vernon and assisted with the total low-income population. These vouchers have allowed non-elderly disabled individuals to find comparable housing, including appropriate services and design features while the rental assistance was comparable to that applicable to the original unit vacated.

3. Elderly Housing Demands and Market Growth Patterns

National Trend – Americans are living longer.

- a. The Center for Disease Control reported that life expectancy in the United States reached a new high 77.2 years of age.
- b. According to the new U.S. Census Report prepared for the National Institute on Aging, Americans are living longer and are experiencing a lower rate of disabilities.
- c. The United States population age 65 and older is expected to double in size within the next 25 years.
- d. By 2030, almost 1 out of every five Americans will be 65 years or older...the age group of 85 or older is now the fastest growing segment of the U.S. population.¹
- e. The first “baby boomers” will turn 65 in 2011 and are projected to represent 20 percent of the U.S. population by 2030. This projected population growth, coupled with rising housing costs, has increased demand for affordable senior citizen housing.

B. Project Description

The Franklin Park West Apartments are located at 114 Franklin Park West in Vernon, Connecticut. This is a federally-funded complex consisting of one-bedroom garden-style apartments located in a beautiful park setting. This complex contains 16 single-level buildings, 4 apartments per building, for a total of 64 units and the Housing Authority of the Town of Vernon is requesting designation of all 64 units as elderly only.

The Franklin Park West Apartments, in conjunction with Court Towers Apartments, were designated as Elderly Only in July, 2000. The designation

expired when the Housing Authority failed to request an extension of the Designated Housing Plan. At this point in time the Vernon Housing Authority is submitting a “New” Elderly-Only Designated Housing Plan for Franklin Park West Apartments. Presently, there are 64 occupied units in the Franklin Park West Apartments and of these units, sixty-one (61) are occupied by elderly tenants and three (3) are occupied by non-elderly disabled tenants. The Housing Authority does not have site-based waiting lists therefore disabled individuals are on the general waiting list. The Housing Authority of the Town of Vernon anticipates grandfathering in the non-elderly disabled residents and if they leave they will be replaced with age and income eligible elderly tenants.

C. Alternative Resources

Presently the Housing Authority of the Town of Vernon administers a Housing Choice Voucher Program. Although the Housing Authority considers these vouchers as general resources the relocation of tenants is not anticipated and non-elderly disabled residents will be grandfathered in. Figures derived from the Consolidated Plan and the Authority’s experience with the Section 8 Housing Voucher program indicate sufficient one-bedroom units available meeting Housing Quality Standards throughout the Town.

The Housing Authority of the Town of Vernon has the following additional federal developments available to both elderly and non-elderly disabled individuals: Franklin Park East - 40 occupied units; Court Towers – 72 occupied units; and Windermere – 40 occupied units;

In addition, the Town of Vernon Housing Authority owns the following rental properties: 75 scattered site properties - 9 family units (federally funded and subsidized); Grove Court – 54 elderly units (state funded development); Francis J. Pitkat Congregate Center – 43 frail elderly units (state funded congregate facility).

The Housing Authority of the Town of Vernon presently has a total of thirteen (13) handicap accessible units and four (4) units with special equipment for individuals who are sight and hearing impaired

The following is the breakdown of the Housing at Franklin Park West Apartments:

- Current number of families in occupancy:
FPW – 64
- Current number of families that are elderly:
FPW – 61
- Current number of families that are not elderly:
FPW – 3 (Non-elderly disabled adults)
- Current waiting list:
All elderly – 0 Bedroom: 96
1 Bedroom: 145
Total: 241
- Accessible units needed:
FPW – 0 - Units are made adaptable and retrofitted as needed with ramps, grab-bars, etc. and if wheelchair necessary resident is put on the waiting list for the next accessible unit at the Housing Authority.
- Units that became vacant during 12 mo. Period 1/1/14 – 12/31/14:
FPW – 7
- Average length of vacancy for a dwelling unit:
FPW – 15 -30 days
- Estimate of expected vacancies during next 2 years:
FPW – 15
- Average length of time elderly have to wait for a dwelling unit:
FPW – 3 years without preferences applied.
- Average length of time non-elderly/disabled have to wait for a dwelling unit:
Approximately 3 years
- Non-elderly/disabled vouchers for disabled only: 15 NED Vouchers
- Access to supportive services:
CRT meal site for neighborhood at FPW and Court Towers
Resident Service Coordinator – VHA Staff
- Housing resources needed to provide housing to same number of non-elderly disabled as before designation:
Easy access, emergency pull strings, grab bars in bathrooms
- Incentives to non-elderly disabled to move out of the designated developments:
Tenant offered transfer, when units available, to other Elderly/Disabled housing at Franklin Park East, Court

Towers, Windermere and Grove Court projects - Housing Authority will move tenant.

- Incentive to elderly to move into designated developments:
None other than a nice, quiet place to live.
- Success rate placing Handicapped/Disabled in Vernon (all programs):
100%
- Overall Section 8 placement rate: 90%
- List of Elderly Developments at the Vernon Housing Authority:
The Vernon Housing Authority does not calculate their vacancy rate by site and has an overall vacancy rate of 1% at the following sites, Franklin Park West/64 units, Franklin Park East/40 units, Court Towers/72 units, Windermere/40 units, Grove Court/54 units.

The information below shows related 2010 Census Data: Population, Demographics and Stats for the Town of Vernon.

CENSUS

POPULATION BY AGE

Total 2010 Census Population:	29,179
62 years and over:	5,570 (19.1%)
65 years and over:	4,553 (15.6%)
Male population:	13,951 (47.8%)
62 years and over:	2,383 (8.2%)
65 years and over:	1,909 (6.5%)
Female population:	15,228 (52.2%)
62 years and over:	3,187 (10.9%)
65 years and over:	2,644 (9.1%)

HOUSEHOLDS BY TYPE

Total households:	12,976
	(28,814 pop. In households)
Family households:	2,363 (56.7%)
Nonfamily households	5,613 (43.3%)
Householder living alone	4,452 (34.3%)
Male:	1,943 (15.0%)
65 years and over:	407 (3.1%)

62-64 years of age:	N/A
Female:	2,509 (19.3%)
65 years and over:	1,057 (8.1%)
62-64 years of age:	N/A
Households with individuals 65 years and over:	3,248 (25.0%)

HOUSING OCCUPANCY

Total housing units:	13,896
Occupied housing units:	12,976 (93.4%)
Vacant housing units:	920 (6.6%)

The Census numbers show the level of near-elderly and elderly population in the Town of Vernon.

If non-elderly disabled tenants chose to move out of any of the Housing Authority of the Town of Vernon apartments and need a 504 compliant unit the Corporation for Independent Living can provide financial assistance in the form of grants to eligible families and individuals who wish to install fixtures and improvements necessary to improve the accessibility and usability of residential dwellings by a person with disabilities. The tenant must have the landlords’ written consent to make the accessibility renovations.

The current services available to elderly tenants of Franklin Park West Apartments will continue to be available to all tenants. The types of services currently available, by outside providers, include counseling, transportation, meal preparation, and recreational activities. The Resident Service Coordinator will continue to assist residents with obtaining services.

D. No Eviction or Lease Termination Due to Designation

There will be no evictions or lease terminations at Franklin Park West Apartments due to the designation as an elderly building. Any tenant lawfully residing in a dwelling unit in a public housing project may not be evicted or otherwise required to vacate because of the designation. Non-elderly disabled tenants will be grandfathered in and if they leave on their own accord they will be replaced with an elderly tenant.

E. Voluntary Relocation Because of Designation

Any tenant wishing to relocate because of the designation must do so on a voluntary basis. When an individual or family agrees to be relocated because of the designation, the Housing Authority of the Town of Vernon will replace that tenant with an elderly tenant and will provide the following:

1. Notice of the designation and an explanation of available relocation benefits, as soon as is practicable for the Housing Authority and the person or family.
2. Access to comparable housing (including appropriate services and design features) which is comparable to that applicable to the unit from which the person or family was vacated.
3. Payment of actual, reasonable moving expenses including utility hookups.

The Housing Authority of the Town of Vernon intends to offer any non-elderly disabled tenant the option of relocating at one of the other developments owned by the VHA. Currently there are three (3) non-elderly disabled families residing at Franklin Park West Apartments. Based on program guidelines there will be no rent differential for these tenants if they choose to move. The cost associated with utility hookups and moving may be assumed by the Housing Authority (for non-elderly disabled tenants moving from Franklin Park West Apartments under the Plan only). There will be no additional costs to the non-elderly disabled tenants.

F. Inapplicability of Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970.

No tenant of a public housing authority shall be considered to be displaced for purposes of the Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970 because of the designation of any existing project or building or portion thereof.

G. Eligibility or near-Elderly Families

Owing to the fact that this Plan, for Franklin Park West Apartments, is for Elderly-Only Designation the Housing Authority of the Town of Vernon has determined to adhere to age (62 and older) and income eligibility and therefore will not provide admittance to near elderly individuals or families.