



CHA

CHICAGO HOUSING
AUTHORITY™

FY2020 SENIOR DESIGNATED HOUSING PLAN



**CHICAGO HOUSING AUTHORITY - FY2020 SENIOR DESIGNATED HOUSING PLAN
TABLE OF CONTENTS**

	<u>PAGE</u>
I. OVERVIEW: THE CHICAGO HOUSING AUTHORITY’S PROPOSAL TO EXTEND AND AMEND ITS SENIOR DESIGNATED HOUSING PLAN	3
A. Reasons for Parameters of the FY2020 Designation	3
B. Providing Notice	3
C. Approval	4
II. REASONS FOR AMENDMENTS TO THE FY2020 SENIOR DESIGNATED HOUSING PLAN	5
A. Key reasons for maintaining the minimum age requirement at senior designated housing properties with high vacancy rates	5
B. Key reasons for maintaining the minimum age requirement for units with accessible features	6
III. SUCCESSFUL IMPLEMENTATION OF THE 2020 SENIOR DESIGNATED HOUSING PLAN	7
A. Policies that Support the FY2020 Senior Designated Housing Plan	7
B. Procedures for Implementation of the FY2020 Senior Designated Housing Plan	8
C. Services to Support the FY2020 Senior Designated Housing Plan	11
IV. DEFINITIONS	13
V. APPENDICES	17
A. List of Senior Designated Properties and Addresses	17
B. Occupancy and Demographic Data for Senior Designated Properties	20
C. Leasing Data for Senior Designated Properties	21
D. Map of CHA Senior Designated Properties in Chicago	22



CHICAGO HOUSING AUTHORITY

FY2020 SENIOR DESIGNATED HOUSING PLAN

I. OVERVIEW: THE CHICAGO HOUSING AUTHORITY’S PROPOSAL TO AMEND ITS SENIOR DESIGNATED HOUSING PLAN (SDHP)

Currently, the Chicago Housing Authority (CHA) has 52 senior designated developments, comprised of 65 buildings (Ravenswood Senior Living has closed on funding as of December 2019). The CHA seeks to extend the parameters of the designation established in FY2010 to increase leasing at senior designated properties with historic high vacancy rates and ensure accessible units continue to provide housing opportunities for residents with disabilities who may benefit from the features.

A. Reasons for Parameters of the FY2020 Designation and Impacted Population

With the Department of Housing and Urban Development’s (HUD’s) approval, CHA lowered the minimum age from age 62 years to age 55 years in 2010 for admission into select senior designated properties. CHA seeks to maintain the minimum age of admission for senior designated properties for several reasons. First, some of CHA’s senior designated properties have vacant units available for lease; second, the population of near elderly individuals continues to grow and the CHA would like to offer the opportunity for this population to live in senior designated properties. Per the latest Census Bureau American Community Survey data, the City of Chicago has demonstrated over 10% growth in its near-elderly population over the past five years. At the same time, the number of housing units available in Chicago has only increased by less than 1%.

In order to meet the demanding housing needs of an aging population, the CHA will strategically lease all of its available units, thus increasing the number of senior households the CHA is able to assist. By lowering the age eligibility for accessible units at select properties that have accessible units¹, the CHA will be able to more quickly house applicants and residents with disabilities who require the accessible features to accommodate their disabilities.

B. Providing Notice

The CHA held a 30-day public comment period from 8 a.m. January 21, 2020 through 5 p.m. February 20, 2020.

The CHA encourages comments during the public comment period on the Draft FY2020 Senior Designated Housing Plan from disability advocates and organizations such as Access Living, Equip for Equality, and the Mayor’s Office for People with Disabilities. These stakeholders are also welcome to attend the public comment hearing during which the CHA will also garner input from residents and resident representatives, the Senior Housing Advisory Council, waitlist applicants and the general public on the Draft FY2020 Senior Designated Housing Plan. All stakeholders will be notified of the public comment period and hearings with advertisements in *Chicago Reader*, *Chicago Sun-Times* and *Fin de Semana*.

¹ While senior designated properties that are CHA-owned public housing and former public housing converted to RAD1 portfolios that include accessible units can offer lower age eligibility to applicants and residents with disabilities who require the accessible features to accommodate their disabilities, other senior designated properties that are not CHA-owned do not provide for this policy. These properties include Independence Apartments, Northtown Apartments and Ravenswood Senior Living.



Finally, copies of the SDHP will be available during the public comment period at the following locations:

- CHA and HCV Administrative Offices 60 E Van Buren St
- Family Investment Center (FIC) 4859 S Wabash St
- Central Advisory Council Office 243 E 32nd St
- HCV Regional Office – South 10 W 35th St
- HCV Regional Office – West 1852 S Albany Av
- Erie Neighborhood House:
 - Little Village* 4225 W 25th St
 - West Town* 1347 W Erie St
- Spanish Coalition for Housing:
 - North Office* 1922 N Pulaski Rd
 - South Office* 1915 S Blue Island
 - SE Office* 9010 S Commercial
- www.thecha.org

Pending approval from the CHA Board of Commissioners the CHA will submit the SDHP to the Department of Housing and Urban Development (HUD).

C. Approval

1. CHA Board of Commissioners – approval of the FY2020 Senior Designated Housing Plan will be sought from the CHA Board of Commissioners on March 17, 2020. The FY2015 Senior Designated Housing Plan was approved by the CHA Board of Commissioners on March 25, 2016.
2. HUD – The approved FY2020 Senior Designated Housing Plan will be submitted to HUD for final authorization and will be valid until December 31, 2025.



II. REASONS FOR AMENDMENTS TO THE FY2020 SENIOR DESIGNATED HOUSING PLAN

With the implementation of the FY2000 Senior Designated Housing Plan (SDHP), CHA established properties for Chicago's elderly population. The commitment to providing seniors with viable low-income housing options was evidenced not only by the numerous agreements between HUD and the City of Chicago, but also by the establishment and subsequent renewal of CHA's Senior Designated Housing Plan.

In FY2010, the CHA sought to build upon these initial efforts by amending the parameters of the senior designation so that, moving forward, the CHA may lower the age requirement to 55 years at select buildings with high vacancies, as well as lease accessible senior units to applicants and residents with disabilities who require the accessibility features.

In FY2020, the CHA seeks an extension of the Designation and the previous amendments to the parameters of the SDHP.

A. Key reasons for extending the minimum age requirement at senior designated housing properties with high vacancy rates and modifying the implementation of the SDHP to return properties back to traditional senior building status:

1. Historically, several CHA senior designated properties have maintained high vacancy rates, meaning these buildings had less than 90% occupied units for six or more consecutive months. Though CHA increased marketing and leasing strategies, buildings maintained higher vacancy rates in some cases due to general market conditions. Reducing the minimum age of applicants to 55 years was identified as a strategy to lease these vacant units. Increased inquiries from the local near elderly population demonstrated an interested population that would benefit from the lower age and increased occupancy rates demonstrated the need to house the near elderly population.

The increasing need of the near elderly for low income housing is evident as described in Section I.A. Reasons for Parameters of the FY2020 Designation and Impacted Population, for Chicago's population citywide.

B. Key reasons for extending the minimum age requirement for senior designated units with accessible features:

1. The CHA has rehabbed units throughout its senior designated properties to include units with accessible features per Federal regulations. Mobility accessible features include wider doorways for wheelchair access, handles on doors and cabinets that do not require grasping, all living spaces to have turning radii, higher toilet seats, lowered sinks and cabinets, a work space in the kitchen, and grab bars in bathrooms. Sensory accessible units have audio and visual alarms in the bedroom(s), living room, kitchen, and bathroom(s).
2. If there is a vacant unit with accessible features and all options in the Federal regulations for tenanting accessible units and the leasing policy are exhausted, the accessible unit is then leased to a non-disabled eligible applicant. The policy states that CHA will require the non-disabled applicant or resident to execute a lease addendum that requires them to move, at the CHA's expense, to a non-accessible unit within thirty calendar days of notice by the CHA if there is an eligible applicant or existing resident with disabilities who requires the



accessibility features of the unit.

3. By maintaining the lower age requirement for select senior designated units with accessible features, the CHA can broaden the applicant base to include more applicants or residents with disabilities, including veterans, who require units with accessible features and avoid leasing accessible units to those who would not benefit from its features.



III. SUCCESSFUL IMPLEMENTATION OF THE 2020 SENIOR DESIGNATED HOUSING PLAN

A. Policies that Support the FY2020 Senior Designated Housing Plan

1. Policies – The CHA will uphold the provisions of the Admissions and Continued Occupancy (ACOP) and Housing Choice Voucher Program Administrative Plan policies pertaining to seniors. These policies include: non-discrimination, reasonable accommodations policy, and accessible units policy for traditional public housing as well as rental assistance demonstration (RAD) housing.

- a. Non-Discrimination

It is the policy of the CHA to comply with all equal opportunity requirements and nondiscrimination laws, rules, ordinances, and regulations imposed by local, state, and federal governments. Applicable Fair Housing and Equal Opportunity laws and regulations provides that no person shall, on the grounds of race, color, sex, age, familial status, religion, disability, national origin, ancestry, sexual orientation (including gender identity), marital status, housing status, order of protection status, military discharge status or source of income be excluded from participation in, or denied the benefits of, or be otherwise subjected to discrimination under the public housing program. The Age Discrimination Act of 1975 provides that no one shall be discriminated against on the basis of age and outlines certain rights of the elderly (24 CFR § 146). The provisions in federal, state and local laws regarding familial status do not apply to housing under any Federal or State program that the Secretary determines is specifically designed and operated to assist elderly persons, as defined in the State or Federal program. (24 CFR § 100.302)

Developers and third-party contractors must design and construct each development in accordance with the Fair Housing Act (FHA), Section 504 Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act (ADA), the Architectural Barriers Act of 1968 (ABA), and the Illinois Accessibility Code (IAC), as well as all other laws prohibiting discrimination on the basis of disability.

- b. Reasonable Accommodations Policy

CHA's Reasonable Accommodations Policy, outlined in Section I.B. of the Admissions and Continued Occupancy Policy as well as Section 2-II.C. of the Housing Choice Voucher Administrative Plan, confirms that CHA and its agents will make reasonable accommodations for residents and applicants if they or a family member have a disability and the individual requests and qualifies for a reasonable accommodation, unless it creates an undue financial or administrative burden on the CHA or requires the fundamental alteration or structural modification of a CHA housing unit. Reasonable accommodations include making modifications or changes to CHA's units, buildings, policies or procedures that will assist applicants and residents with a disability to take full advantage of and use CHA programs or programs operated by other agencies on CHA property.

Residents who request an accessible unit during relocation are offered an accessible unit once it is complete. Additionally, CHA established a preference in the ACOP for offering accessible units to qualified residents with disabilities before offering those units to other families. This preference applies as well in the Administrative Plan, Chapter 18 Policies for Rental Assistance Demonstration Properties. If CHA does offer an accessible or adaptable



unit to a non-disabled family, the family must sign a lease rider that establishes their willingness to move to another non-accessible unit within 30 days when a current resident or applicant with a disability needs the unit's accessible features.

c. Accessible Units Policy

1. Pursuant to eligibility requirements, the CHA will offer available accessible units in the following order:
 - a. First, to a current qualified resident with a disability living in the same development that requires the special features of the vacant accessible unit and occupying a unit not having those accessibility features;
 - b. Second, to a current qualified resident with a disability residing in another development that requires the accessibility features of the vacant accessible unit;
 - c. Third, to an eligible, qualified applicant with disabilities on the wait list who requires the accessibility features; and
 - d. Fourth, to a non-disabled eligible applicant or resident. The CHA will require the applicant or resident to execute a lease addendum that requires them to move, at the CHA's expense, to a non-accessible unit within 30 calendar days of notice by the CHA if there is an eligible applicant or existing resident with disabilities who requires the accessibility features of the unit. **24 CFR § 8.27.**
2. The CHA shall not prohibit a qualified eligible, disabled family from accepting a non-accessible unit for which the family is eligible, which may become available before an accessible unit. The CHA may modify a non-accessible unit as needed as a reasonable accommodation, unless the modification would result in an undue financial and/or an administrative burden or would require the fundamental alteration or structural modification of a CHA housing unit.

B. Procedures for Implementation of the FY2020 Senior Designated Housing Plan

1. Procedures for Implementation of Lowering the Age to 55 at Senior Designated Properties with high vacancy rates.²
 - a. The CHA will continue to conduct ongoing review to determine what senior designated properties are considered high vacancy buildings. The foundational criteria for determining whether the CHA will lower the age at a senior designated property is that the property must have an occupancy rate lower than 90% (determined by the CHA's housing management system) for six months or longer. Additional factors contributing to occupancy rate will also be evaluated for those buildings who have experienced less than a 90% occupancy rate for six months or longer prior to deeming the property eligible for near elderly leasing. Additional factors include, but are not limited to, initiatives affecting leasing, such as

² While senior designated properties that are CHA-owned public housing and former public housing converted to RAD1 portfolios will be subject to review associated with vacancy rates and lowering eligibility to near elderly, those in which age eligibility is governed by external tenant selection plans are not subject to this vacancy rate evaluation procedure. These include Independence Apartments, Northtown Apartments, Ravenswood Senior Living and Rosenwald Courts Apartments.

maintenance and redevelopment work requiring floating unit vacancies in order to complete the work.

- b. When a building qualifies as a high vacancy building, the CHA will notify the property manager that the CHA is lowering the age for the head of household to 55 years old at that building. The Property Manager is responsible for updating all of their marketing materials and for informing potential applicants that anyone whose head of household is 55 years old and over is eligible to apply for a unit in that building.
 1. If the building increases its occupancy rate and maintains a 98% occupancy rate for 12 months or more, then the CHA will evaluate and transition that building back to an elderly building and will no longer consider the building a high vacancy building. If a building is transitioned back to an elderly building, the CHA will no longer screen or offer units to anyone that is categorized as a near elderly applicant. Those near elderly applicants who are in screening at the time of transition will complete the screening cycle, remaining eligible to be housed at the previously near elderly property within that screening cycle *only*.
- c. The Occupancy Department will maintain a list of all properties that qualify as high vacancy buildings. All potential applicants will be notified of the senior designated properties where the head of household is required to be 62 and over and the senior designated properties where the head of household is required to be 55 and over.
- d. The Occupancy Department will accept applications for all high vacancy buildings from applicants whose head of household is 55 years old and over.

If a near elderly applicant is applying for a high vacancy building's waitlist, or following screening, is returned to a high vacancy building's waitlist and that building is then removed from the high vacancy status, that applicant will be notified of the age-eligibility change and their ability to select any other site-based waitlist for which they are eligible, which includes family and near elderly waitlists, or remain on the existing site-based waitlist for the now traditional elderly property in a deferred status until they become age-eligible.

- e. All applicants will be placed on the senior site-based waitlist according to original date of application.
- f. At high vacancy buildings, the CHA has established three hierarchic ranking preferences for the site-based waitlists based on age eligibility in an effort to preserve the senior designation of the buildings. Within each hierarchic preference, applicants will be placed on the site-based waitlist according to original date of application.

The hierarchal ranking preferences are listed, in order, below:

1. First to applicants who are 62 and older
 2. Second to applicants who are 60-61 years old
 3. Third to applicants who are 55-59 years old
- g. The CHA's Work Requirement will continue to apply to all applicants and residents who are between the ages of 17-54. For more information on the work requirement, please consult the ACOP and Administrative Plan, Chapter 18 Policies for Rental Assistance Demonstration Properties.
2. Procedures for Implementation of Lowering the Age for Accessible Units in Senior Designated Housing at All Buildings (regardless of vacancy rates)

a. Applications for Units with Accessible Features³

Select senior site-based waitlists will accept applications from heads of households who are 55 years old and older who require units with accessible features. These individuals will be given a non-ranked preference for the site-based waitlist in the CHA's housing management system.

- b. In an effort to preserve the senior designation of the buildings, the CHA follows the hierarchal ranking preferences as listed, in order, below for elderly and near elderly applicants who require units with accessible features:

1. First to applicants who are 62 and older
2. Second to applicants who are 60-61 years old
3. Third to applicants who are 55-59 years old

c. Vacant Units with Accessible Features

Property managers at senior designated housing properties that have vacant units with accessible features will contact the Occupancy Department and let them know of the vacancy.

The CHA will follow the Accessible Unit Policy stated in Section III.A, subsection[a] and [b] of the Senior Designated Housing Plan to fill the vacant units prior to moving to the waitlist.

If there is no one in housing who requires the unit with the accessible features, the Occupancy Department will send the Property Manager a waitlist with the names of the applicants who have been given the preference because of their need for the accessible unit. The Property Manager will then begin the screening

³ While senior designated properties that are CHA-owned public housing and former public housing converted to RAD1 portfolios that include accessible units can offer lower age eligibility to applicants and residents with disabilities who require the accessible features to accommodate their disabilities, other senior designated properties that are not CHA-owned do not provide for this policy. These properties include Independence Apartments, Northtown Apartments and Ravenswood Senior Living.



process.

If there is no one on the wait list who requires the unit with accessible features, then the CHA will offer the units to a non-disabled eligible applicant or resident. Applicants or residents who lease an accessible unit and do not require the accessible features of the unit must sign a waiver that explains if a qualified disabled applicant or resident needs the accessible features of the leased unit, they must move.

d. Occupied Units with Accessible Features

The CHA will follow the Accessible Unit Policy stated in Section III.A of the Senior Designated Housing Plan.

C. Services to Support the FY2020 Senior Designated Housing Plan

CHA provides residents living in its senior designated properties with access to a variety of supportive services that support seniors' housing stability and quality of life through the Resident Service Coordination program or FamilyWorks program⁴. These services, which foster an environment conducive to aging in place that is welcoming to active seniors as well as those needing more support, will continue to be offered at the properties designated in this FY2020 Senior Designated Housing Plan, including:

1. Benefits Screening Contracted service providers, whether assigned through the Resident Service Coordination program or FamilyWorks program, will link residents to local, State, and Federal benefits. The contracted service providers determine what services the resident needs; identify programs and benefits that are available to residents who meet the eligibility criteria; and follow up with each resident after the screening.
2. Opportunities for activity - Contracted service providers coordinate and provide a variety of activities, (e.g.; social, recreational, cultural, educational, health and wellness) for residents in the senior buildings and facilitate resident participation in several citywide events such as holiday celebrations.
3. Assessment and Referral - Upon request from a resident, or lease compliance and/or social service referral from management, contracted service providers offer to meet with the resident to understand their needs and make appropriate referrals and linkages to services. A resident's acceptance of the contracted service provider's offer of an assessment and referral(s) is completely voluntary and requires the resident's signed consent.

⁴ Resident Service Coordinators are stationed at CHA-owned senior designated properties within the public housing and former public housing converted to RAD1 portfolios. Resident Service Coordinators are also accessible for newly-developed RAD1 senior designated properties, Independence Apartments, Northtown Apartments and Ravenswood Senior Living. FamilyWorks service providers are available for senior designated buildings that are part of family public housing properties, Bridgeport Elderly, Hilliard Senior and Ida Platt Apartments. FamilyWorks service providers are also available for all senior designated properties in need of emergency clinical services.

Rosenwald Courts Apartments is not CHA-owned and does not receive CHA supportive services. Services are provided by the owner, Mercy Housing.

4. Distribute information - Contracted service providers regularly distribute a variety of informational flyers and packets designed to help residents understand pressing health and educational issues and learn about resources.
5. Well-being checks - Contracted service providers perform Senior Home Visit Assessments at all senior designated properties where CHA has contracted service providers. Additionally, in the case of weather-related emergencies, property management perform well-being checks on residents and provide access to requisite services, as necessary, with the assistance of contracted service providers.

IV. Definitions

1. Accessible - When used with respect to the design, construction, or alteration of housing and non-housing programs, 'accessible', means that the program or portion of the program when designed, constructed, altered or adapted, can be approached, entered, and used by individuals with disabilities.
2. Accessible Unit - A unit that is designed, constructed, altered or adapted to be in compliance with the Uniform Federal Accessibility Standards (UFAS) meets the minimum standards for compliance and is accessible.
3. Admission – The point in which the family becomes a public housing resident. The date used for this purpose is the effective date of the HUD Form 50058 for the family.
4. Applicant - An individual or a family that has applied for admission to CHA public housing.
5. CHA: The Chicago Housing Authority. The definition includes the CHA, its contractors, agents, and assignees.
6. Co-head of household - is an individual in the household who is equally responsible with the head of household for ensuring that the family fulfills all of its responsibilities under the program. A family can have only one co-head.
7. Disabled Family - A family whose head, spouse, or sole member is a person with disabilities. (Person with disabilities is defined later in this section.) The term includes two or more persons with disabilities living together, or one or more persons with disabilities living with one or more live-in aides. **24 CFR § 5.403**
8. Elderly Family - A family whose head, spouse, or sole member is at least 62 years of age. It may include two or more elderly persons living together, or one or more elderly persons living with one or more non-elderly persons, including live-in aides, determined to be essential to the care and well-being of the elderly person(s). An elderly family may include elderly persons with disabilities and other family members who are not elderly. **24 CFR § 5.403.**
9. Elderly Person - A person who is at least 62 years of age. **42 USC § 1437a(b)(3).**
10. Family - Two or more persons (with or without children) regularly living together, related by blood, marriage, adoption, guardianship, or operation of law who will live together in CHA housing; **OR** two or more persons who are not so related, but are regularly living together, and can verify shared income or resources.

The term family also includes: Elderly family (Definition #8), near elderly family (Definition #14) disabled family (Definition #7), displaced person, single person, the remaining member of a resident family, or a kinship care arrangement. Other persons, including members temporarily absent (e.g. a child temporarily placed in foster care or a student temporarily away at college), may be considered a part of the applicant family's household if they are living or will live regularly with the family. **24 CFR § 5.403.**

Live-in Aides may also be considered part of the household. However, live-in aides are not family members and have no rights as remaining family members.

Foster Care Arrangements include situations in which the family is caring for a foster adult(s) or child(ren) in their home who have been placed there by a public adult or child placement agency. These individuals are household members but are not family members and have no rights as

remaining family members because they do not have the legal capacity to remain in the home without an authorized remaining family member who is eligible to assume the role of the head of household.

For purposes of continued occupancy, the term family also includes the remaining member of a resident family with the capacity to execute a lease.

11. Head of the Household - The adult member of the family who is considered the head for purposes of determining income eligibility and rent. However, the income of the head of household, spouse, and each additional family member is included in determining rent. The head of household is responsible for ensuring that the family fulfills all of its responsibilities under the program, alone or in conjunction with a co-head or spouse. **24 CFR 5.504(b)**

- a. The family may designate any qualified family member as the head of household.
- b. The head of household must have the legal capacity to enter into a lease under state and local law. A minor who is emancipated under state law may be designated as head of household.

12. Household – Is a broader term for family that includes additional people who, with the CHA’s permission, live in a unit, such as live-in aides, foster children, and foster adults. However, household members are not family members and do not qualify as remaining family members.

13. Individual with Disabilities - The definition of an individual with disabilities is for the purpose of determining if an individual may obtain a reasonable accommodation or physical modification.

The Section 504 of the Rehabilitation Act (Section 504), Fair Housing Act and Americans with Disabilities Act (ADA) definitions of Individual with Handicaps and Qualified Individual with Disabilities are not the definitions used to determine program eligibility. Instead, use the definition from 42 USC 1437a(b)(3) of “Person with Disabilities” as defined separately (#16) in this section.

The terms ‘handicapped person’ or ‘person with handicaps’ as defined in Section 504 and the Fair Housing Act are synonymous with the term ‘individual with disabilities’.

- a. A physical or mental impairment that:
 - i. Substantially limits one or more major life activities;
 - ii. Has a record of such an impairment; or
 - iii. Is regarded as having such impairment.
- b. For purposes of housing programs, the term does not include any individual who is an alcoholic or drug abuser whose current use of alcohol or drugs prevents the individual from participating in the program or activity in question, or whose participation, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others.

- c. Definitional elements:

“Physical or mental impairment” means any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: immune; normal cell growth; circulatory; neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness; and specific learning disabilities. The term “physical or mental impairment” includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral

palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.

“Major life activities” means functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working, eating, sleeping, standing, lifting, bending, reading, concentrating, thinking, and communicating.

“Has a record of such an impairment” means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

“Is regarded as having an impairment” means has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by a recipient as constituting such a limitation; or has a physical or mental impairment that substantially limits one or more major life activities only as result of the attitudes of others toward such impairment; or has none of the impairments defined in this section but is treated by a recipient as having such an impairment. **24 CFR § 8.3.**

14. Near-elderly Family - A family whose head, spouse, or sole member is a near-elderly person. The term includes two or more near-elderly persons living together, and one or more near-elderly persons living with one or more persons who are determined to be essential to the care or well-being of the near-elderly person or persons. A near-elderly family may include other family members who are not near-elderly. **24 CFR § 5.403.**
15. Near-elderly Person - A person who is at least age 50 but below age 62, who may be a person with a disability. **42 USC 1437a(b)(3).**
16. Person with Disabilities⁵ This is the definition used to determine program eligibility. Under **42 USC § 1437a(b)(3)**, means a person⁶ who:
 - a. Has a disability as defined in Section 223 of the Social Security Act **42 USC 423**;
 - b. Has a physical, mental or emotional impairment that:
 - i. Is expected to be of long continued and indefinite duration;
 - ii. Substantially impedes his/her ability to live independently; and
 - iii. Is of such nature that such disability could be improved by more suitable housing conditions.
 - c. Has a developmental disability as defined in Section 102 (5)(b) of the Developmental Disabilities Assistance and Bill of Rights Act **42 USC § 6001(5).**
17. Qualified Individual with Disabilities, An individual with disabilities who meets the essential eligibility requirements and who can achieve the purpose of the program or activity without modifications in the program or activity that the CHA can demonstrate would result in a fundamental alteration in its nature.

Essential eligibility requirements include stated eligibility requirements such as: income as well as other explicit or implicit requirements inherent in the nature of the program or activity, such as requirements that an occupant of multifamily housing be capable of meeting the recipient’s selection criteria and be capable of complying with all obligations of occupancy with or without supportive services provided by persons other than the CHA. **24 CFR § 8.3.**

⁵ This is the program definition for public housing. The 504 definition does not supersede this definition for eligibility or admission.

⁶ A person with disabilities may be a child.

18. Site-based Waitlists (all) - Lists of applicants based on their preferred location of housing. All current applicants should be given information about each site and an opportunity to select one development or spatially-clustered group of developments where they would accept a unit offer based on their head of household's age- and family size-eligibility. Developments for which site-based waitlists have been established include all of CHA's family, near elderly as well as elderly developments across both public housing and project-based voucher portfolios. Once the initial site-based lists have been established, all applicants will be informed of their estimated wait time and have an opportunity to change their site selection to any other site for which they are age- and family size-eligible. Ranking preferences establish the order of placement on the wait list but do not guarantee admission; **24 CFR § 903.7(b)(2)**.

19. Senior Designated Site-based Waitlists - Lists available to near elderly and elderly applicants based on their preferred location of housing. All current applicants should be given information about each site and an opportunity to select one development or spatially-clustered group of developments where they would accept a unit offer based on their head of household's age- and family size-eligibility. Once the initial senior designated site-based lists have been established, all applicants will be informed of their estimated wait time and have an opportunity to change their site selection to any other site for which they are age- and family size-eligible. Ranking preferences establish the order of placement on the waitlist but do not guarantee admission; **24 CFR § 903.7(b)(2)**.



V. APPENDICES

APPENDIX A: LIST OF SENIOR DESIGNATED PROPERTIES

The chart below is a list of senior designated properties.

Development Name	Development Address
Ada S. Dennison-McKinley Apts	661 E 69TH ST
Albany Terrace Apts	3030 W 21ST PL
Alfreda Barnett Duster Apts	150 S CAMPBELL AVE
Apartamentos Las Americas	1611 S RACINE AVE
Armour Square Apts & Annex	3120 S WENTWORTH AVE
Armour Square Apts & Annex	3146 S WENTWORTH AVE
Armour Square Apts & Annex	3216 S WENTWORTH AVE
Armour Square Apts & Annex	3250 S WENTWORTH AVE
Blake/Martinez/Wood Apts	2140 N CLARK ST
Blake/Martinez/Wood Apts	2111 N HALSTED ST
Blake/Martinez/Wood Apts	1845 N LARRABEE ST
Bousfield/Richardson-Jones Apts	4930 S LANGLEY AVE
Bousfield/Richardson-Jones Apts	4949 S COTTAGE GROVE AVE
Bridgeport Elderly **	841 W 32ND ST
Britton Budd Apts	501 W SURF ST
Caroline Hedger Apts	6400 N SHERIDAN RD
Castleman/Ella Flagg Young Apts	4645 N SHERIDAN RD
Castleman/Ella Flagg Young Apts	4945 N SHERIDAN RD
Crowder Place Apts	3801 N PINE GROVE AVE
Daniel Hudson Burnham Apts	1930 W LOYOLA AVE
Edith Spurlock Sampson Apts	2640 N SHEFFIELD AVE
Edith Spurlock Sampson Apts	2720 N SHEFFIELD AVE
Elizabeth Davis Apts	440 N DRAKE AVE
Fannie Emanuel Apts	3916 W WASHINGTON BL
Fisher Apts	5821 N BROADWAY ST

RAD1
Mixed Income

* Property not eligible for review associated with vacancy rate trends and lowering eligibility to near elderly.

** Property not eligible for CHA-provided supportive services via Resident Service Coordinators but can access FamilyWorks



Development Name	Development Address
Flannery Apts	1507 N CLYBOURN AVE
Flannery Apts	1531 N CLYBOURN AVE
Green/Harsh Apts	4227 S OAKENWALD AVE
Green/Harsh Apts	4030 S LAKE PARK AVE
Harry Schneider Apts	1750 W PETERSON AVE
Hattie Callner Apts	855 W ALDINE AVE
Hilliard Senior Phase 1 **	2111 S CLARK ST
Hilliard Senior Phase 2 **	30 W CERMAK RD
Ida Platt Senior Apts	10513-51 S YATES AVE
Ida Platt Senior Apts	2440-54 E 106TH ST
Independence Apts *	4022 N ELSTON AVE
Irene McCoy Gaines Apts	3700 W CONGRESS PKWY
Judge Slater Apts & Annex	4218 S COTTAGE GROVE AVE
Judge Slater Apts & Annex	740 E 43RD ST
Kenneth Campbell Apts	6360 S MINERVA AVE
Lidia Pucinska Apts	847 N GREENVIEW AVE
Lidia Pucinska Apts	838 N NOBLE ST
Lincoln Perry Apts and Annex	243 E 32ND ST
Lincoln Perry Apts and Annex	3245 S PRAIRIE AVE
Long Life Apts	344 W 28TH PL
Lorraine Hansberry Apts	5670 W LAKE ST
Mahalia Jackson Apts	9141 S SOUTH CHICAGO AVE
Mahalia Jackson Apts	9177 S SOUTH CHICAGO AVE
Major Lawrence Apts	655 W 65TH ST
Mary Hartwell Catherwood Apts	3920 N CLARK ST

RAD1
Mixed Income

* Property not eligible for review associated with vacancy rate trends and lowering eligibility to near elderly.

** Property not eligible for CHA-provided supportive services via Resident Service Coordinators but can access FamilyWorks



Development Name	Development Address
Mary Hartwell Catherwood Apts	3930 N CLARK ST
Mary Hartwell Catherwood Apts	3940 N CLARK ST
Minnie Riperton Apts	4250 S PRINCETON AVE
Mulvey Place Apts	416 W BARRY AVE
Northtown Apts *	2410 W PRATT BLVD
Patrick Sullivan Apts	1633 W MADISON ST
Ravenswood Senior Living *	4501 W WINCHESTER AVE
Rosenwald Courts Apartments *, ***	4642 S MICHIGAN AVE
The Kenmore	5040 N KENMORE
The Pomeroy	5650 N KENMORE AVE
Vivian Carter Apts	6401 S YALE AVE
Wicker Park Apts & Annex	1414 N DAMEN AVE
Wicker Park Apts & Annex	2020 W SCHILLER ST
William Jones Apts	1447 S ASHLAND AVE
Zelda Ormes Apts	116 W ELM ST

RAD1
Mixed Income

* Property not eligible for review associated with vacancy rate trends and lowering eligibility to near elderly.

** *Property not eligible for CHA-provided supportive services but receives supportive services via Mercy Housing.



APPENDIX B: DEMOGRAPHIC DATA FOR PROPOSED SENIOR DESIGNATED PROPERTIES

The chart below provides demographic data for properties proposed for senior designation in the FY2020 Senior Designated Housing Plan.

Senior Housing Demographics as of 9/30/19³	
Housing Stock & Occupancy	
Total Units	9,714
Occupied Units	8,918
Total Number of Residents	9,861
Average Household Size	1
Unit Size (All Units)	
0 Bedroom	1,176
1 Bedroom	8,508
2 Bedrooms	30
3 Bedrooms	0
4 Bedrooms	0
5 Bedrooms	0
6 Bedrooms	0
7+ Bedrooms	0
Gender (All Residents)	
Female	4,908
Male	4,953
Age (All Residents)	
0-17	11
18-54	143
55-61	414
62 and over	9,293
Race & Ethnicity (All Residents)	
African American, non-Hispanic	5,447
Asian, non-Hispanic	1,620
White, non-Hispanic	1,616
Hispanic, any race	1,076
Native Hawaiian/Other Pacific Islander, non-Hispanic	42
American Indian/Alaska Native, non-Hispanic	35
Other/Unknown Race	25

*Includes all Senior PH and RAD1 units

³ Demographic information is from CHA's Yardi database. Demographics in the Yardi database may contain inconsistencies due to data conversion and data entry.

APPENDIX C: LEASING DATA FOR SENIOR DESIGNATED PROPERTIES

Senior Designated Property	Site-Based Waitlist Code	Property Code - 2017	Reduced Age - 2019	YE2016				YE2017				YE2018				YE2019			
				Total Units	Occupied Units	Vacant Units	Non-Dwelling Units	Total Units	Occupied Units	Vacant Units	Non-Dwelling Units	Total Units	Occupied Units	Vacant Units	Non-Dwelling Units	Total Units	Occupied Units	Vacant Units	Non-Dwelling Units
Ada S. McKinley	sr69schg	a081000		125	118	4	3	125	120	2	3	125	113	9	3	125	115	8	2
Albany Terrace	sralbany	a061000	Reduced	350	316	27	7	350	301	26	23	350	255	48	47	350	242	45	63
Alfreda Duster Barnett	sr150cam	a042000		129	125	1	3	129	123	3	3	129	118	8	3	129	117	9	3
Armour Square	srarmour	a046000		392	367	11	14	392	377	1	14	392	377	1	14	392	364	14	14
Bridgeport Elderly	srbridge	a003000		129	115	4	10	129	115	4	10	129	119	0	10	129	112	8	9
Britton Budd	srbrtbud	a144000		173	171	1	1	173	169	3	1	173	167	5	1	173	161	12	0
Caroline Hedger	srserdvn	rd076000		450	0	268	182	450	303	144	3	454	404	50	0	450	444	5	1
Crowder Place	srpresby	a790100										63	38	16	9	71	47	15	9
Daniel Hudson Burnham	srloyola	rd075000		181	0	178	3	179	173	5	1	178	176	2	0	178	174	4	0
Edith Spurlock Sampson	srlnshf	a074000		394	372	12	10	394	377	7	10	394	373	11	10	394	361	24	9
Elizabeth Davis	srfrmdrk	rd050000		149	143	5	1	149	141	7	1	150	120	29	1	148	111	36	1
Castleman/Ella Flagg Young	srserfnd	a060000		436	412	17	7	436	420	9	7	436	425	2	9	436	418	16	2
Fannie Emanuel	srpkvkw	rd065000										181	178	2	1	181	178	2	1
Fisher	srfisher	rd057000		199	127	3	69	198	158	10	30	197	174	14	9	197	195	2	0
Flannery	srflann	a044000		252	244	5	3	252	247	2	3	252	243	8	1	252	239	21	1
Hattie Gallner	srallner	rd048000		147	136	6	5	147	141	1	5	147	139	3	5	146	136	8	2
Hilliard	srhillrd	a100000		94	92	2	0	94	93	1	0	94	91	3	0	94	92	2	0
Hilliard	srhillrd	a135000		94	90	4	0	94	93	1	0	96	91	5	0	94	94	0	0
Ida Platt	srmtmys	a098000		465	407	46	12	465	437	16	12	465	443	11	11	465	433	21	11
Independence	rd022005															30	30	0	0
Irene McCoy Gaines	srgrfld	a062000	Reduced	151	147	2	2	151	129	20	2	151	108	26	17	151	103	8	40
Green/Harsh*	srsgreen	rd083000		277	261	10	6	278	269	3	6	278	246	26	6				
Judge Green	rd083000															153	135	16	2
Judge Slater	srjslatr	rd084000	Reduced	46	0	29	17	402	393	9	0	402	387	15	0	402	354	48	0
Kenmore	srkenmor	a151000		100	98	1	1	100	99	0	1	100	98	2	0	100	100	0	0
Kenneth Campbell	srcambel	rd062000		165	159	4	2	165	162	1	2	164	159	5	0	165	150	15	0
Las Americas	sraccine	rd063000		212	201	8	3	212	209	0	3	211	201	8	2	211	197	12	2
Lidia Pucinska	srckhrt	a043000		378	370	5	3	378	369	6	3	378	371	4	3	378	373	4	1
Lincoln Perry	srlnprry	rd052100		450	0	369	81	442	366	9	67	444	357	40	47	442	332	75	35
Long Life	srshild	rd066000		116	110	3	3	116	113	0	3	114	113	0	1	114	112	1	1
Lorraine Hansberry	srpkside	rd064000		169	160	6	3	166	166	0	0	167	155	12	0	166	146	20	0
Mahalia Jackson	srsochgo	a041000		282	256	21	5	282	267	10	5	282	261	18	3	282	265	14	3
Blake/Martinez/Wood	srckbur	a072000		316	299	10	7	317	305	5	7	317	296	14	7	317	298	14	5
Mary Hartwell Catherwood	srckirv	a055000		357	351	3	3	357	349	5	3	358	354	1	3	358	341	15	2
Bousfield/Richardson-Jones	srflangj	rd079000	Reduced	266	253	8	5	266	255	6	5	266	240	21	5	267	237	29	1
Minnie Riperton	srpmctn	rd078000	Reduced	337	0	277	60	336	271	16	49	335	330	4	1	335	289	45	1
Mulvey Place	srpresby	a790100										63	38	16	9	71	47	15	9
Northtown	rd022004															30	30	0	0
Patrick Sullivan	srslulvn	rd067000	Reduced	482	466	12	4	482	461	13	8	482	435	42	5	479	434	45	0
Pomeroy	srpomroy	a152000		105	103	1	1	105	103	1	1	105	104	0	1	105	102	3	0
Robert Lawrence	srwrnce	rd086001	Reduced	181	0	0	181	191	174	7	10	191	182	7	2	191	167	22	2
Rosenwald Courts	srrosenw	a166000	Reduced Age*					60	60	0	0	60	57	3	0	60	59	1	0
Schneider	srshndr	rd059000		174	164	9	1	174	168	6	0	173	167	5	1	174	160	14	0
Vivian Carter	srlyale	rd080000	Reduced	224	203	18	3	224	215	6	3	221	205	16	0	221	208	13	0
Vivian Gordon Harsh	rd077000															123	105	16	2
Wicker Park	srwkpka	a069000		225	215	5	5	225	216	4	5	225	218	2	5	225	214	9	2
William Jones	srwmjone	rd070000		116	107	6	3	116	108	5	3	114	103	10	1	114	109	5	0
Zelda Ormes	srflsldv	a049000		269	255	8	6	269	252	11	6	269	249	14	6	269	244	20	5

*Green/Harsh property group converted to two RAD1 properties, Judge Green and Vivian Gordon Harsh in 2019.

APPENDIX D: MAP OF CHA SENIOR DESIGNATED PROPERTIES

