

Marin County Affordable Housing Trust Fund: Disability-Forward Recommendations



Executive Summary

The Marin County Affordable Housing Trust ("Trust Fund") was established to increase and preserve permanently affordable housing throughout Marin County by providing local financial and technical assistance that leverages state and federal resources. This memo provides recommendations for how the Trust Fund can increase the supply of disability-forward housing; housing that is affordable, accessible, and inclusive for people with and without disabilities.

The Trust Fund's goals of affordable housing production, promoting fair housing choice, and expanding access to housing for low-, very low-, and extremely low-income households, offer a strong foundation for advancing disability-forward housing. Yet, such housing can only be achieved by updating program guidelines and criteria.

Marin County can strengthen the impact and long-term value of the Trust Fund by embedding accessibility, inclusive design, and disability inclusion throughout its guidelines, application process, funding decisions, and implementation supports. Disability-forward housing should not be treated solely as a specialized housing type for a discrete population. It is an approach to design, affordability, and community that expands housing choice for people with disabilities, families, and older adults, while creating homes that are more usable, adaptable, and welcoming for residents of all ages, abilities, and changing needs.

To achieve these goals, the Trust Fund should explicitly name disability as an included population in those served by the fund and within affordable housing. In addition to this, specific programmatic changes can be implemented to directly serve that population:

- Establish Disability-Forward or Disability Inclusive as a recognized project type (Section: Types of Projects)
- Provide maximum per-unit subsidy to projects that include deep affordability and inclusive design (Section: Funding Amounts)
- Permit funded activities to include rental subsidy and resident services reserves (Section: Funded Activities/Activities Eligible for Funding)



- Require technical assistance to ensure inclusive design elements are embedded in every funded project

Together, these changes would allow the Trust Fund to generate greater public value by expanding fair housing choice, supporting deeper affordability and resident stability, and creating homes that can better serve Marin residents over time. Rather than establishing a separate disability program, these recommendations would strengthen the equity, quality, and long-term effectiveness of the Trust Fund's entire affordable housing portfolio.

Naming Disability Within the Goals and Guidelines

The Trust Fund goals emphasize increasing affordable housing opportunities, supporting a diversity of housing types, expanding housing opportunities for people with special needs, and promoting fair housing choice. Collectively, these goals align with disability-forward housing. Yet without explicitly including disability-forward housing or people with disabilities or inclusive housing as a priority, a crucial segment of Marin's population will continue to be left behind, and the Trust Fund will not be able to unlock its full potential of serving all residents with and without disabilities.

The Trust Fund should explicitly recognize accessibility and disability inclusion as essential components of affordable housing in implementing the existing goals. While the current language supports equitable housing opportunities, more explicit recognition of disability-forward housing would reinforce that access and inclusion are fundamental to achieving the Trust Fund's objectives of affordability, fair housing, and housing choice.

Programmatic Recommendations

Establish Disability-Forward or Disability Inclusive as a recognized project type

Explicitly include inclusive housing for people with and without disabilities in the types of projects eligible. The recommended terms to use can include:

- Disability Inclusive housing that is integrated for people with and without disabilities
- Disability-forward housing: affordable, accessible, and inclusive housing for people with and without disabilities



Even though housing for people with disabilities can be categorized as supportive housing or in the “any other” category, it is important to explicitly name this typology to help socialize it as a housing type that must be prioritized. Moreover, “supportive and transitional” housing can often be interpreted as housing for 100% people with disabilities. The Trust Fund should be increasing investments in integrated, inclusive housing for people with and without disabilities.

[Provide maximum per-unit subsidy to projects that include deep affordability and inclusive design](#)

The Trust Fund can establish an automatic maximum subsidy of \$100,000 allocation for units designated as extremely low-income (ELI). People with disabilities must often remain on SSI in order to access the health care and supportive services they need to remain in their homes and communities and live at or below 30% of AMI. These ELI homes can be difficult to include in affordable projects without subsidies to support that deep affordability.

The Trust Fund can also provide an automatic \$100,000 per-unit subsidy if the project implements enhanced accessibility. This could include linking per-unit subsidy to projects that integrate the [Inclusive Design Standards](#) at the Gold, Silver, or Platinum levels, or adopt other inclusive or universal design guidelines. This will incentivize the developer to embed a range of disability-forward, inclusive design features into the project, benefiting not just people with disabilities and older adults, but all residents.

[Permit funded activities to include rental subsidies and resident services reserves](#)

In addition to the current allowable uses of housing development and construction, there is an allowance of open-ended “any other activity.” Since many elements of accessibility and inclusion come after a building has opened, the Trust Fund can directly support uses, including:

- Capitalized Operating Subsidy Reserve (COSR): The Trust Fund can fund developers to capitalize an operating subsidy reserve within their projects to bridge the gap between a unit's restricted rent and what extremely low-income residents (including residents with disabilities on fixed incomes such as SSI) can actually afford to pay. To remain financially viable over the life of the affordability covenant, COSRs should be targeted to a limited share of units, with developers required to demonstrate a viable long-term funding plan for the reserve as part of their proposal.



- Resident Services Operating Funds: The Trust Fund can fund the creation of project operating funds for supportive services throughout the life of the development. Eligible uses of these funds should include 20-year capitalized operating subsidy reserves and supportive services reserves, thereby ensuring long-term sustainability of service provision. These funds can be available for projects that reserve units for people with disabilities who use or are eligible for Medicaid home and community-based services.

Require technical assistance to ensure inclusive design elements are embedded in every funded project

To support the successful implementation of disability-forward project types, funding activities, and the overall inclusion of people with disabilities in Trust Fund projects, all award recipients should be required to receive technical assistance. The goal is for all awarded developer(s) to receive some level of assistance in embedding inclusive design elements into their projects, regardless of the target population or project type. The Trust Fund can offer tiered technical assistance options:

- Tier 1: Recorded Webinar (Lowest Touch): This option involves a recorded training session that project teams are required to watch once they receive a funding award from the Trust Fund
- Tier 2: Annual Live Training and Office Hours: This tier would feature a live annual training session with an opportunity for Q&A. It would be supplemented by "office hours" where awardees can have more in-depth time with experts to discuss their specific projects
- Tier 3: Formal Plan Reviews (Most In-depth): The most robust option includes recorded training combined with a formal contract for plan reviews. Under this tier, an organization like The Kelsey, or an inclusive design or disability-forward architecture firm, would conduct a detailed review of development plans and provide project-specific recommendations to make the development more accessible and inclusive for people with all types of disabilities.

Conclusion

Marin County has an opportunity to increase affordable housing that better meets the needs of all residents, including people with disabilities and older adults. In fact, implementing the recommendations will allow the Trust Fund to:



- Prioritize integrated living by formally recognizing "disability inclusive housing" and "disability-forward housing" as essential project typologies
- Address extreme rent burdens for those on fixed federal benefits by maximizing subsidies for units restricted to households earning below 30% AMI
- Incentivize high-quality, accessible design through dedicated funding for projects that embed inclusive, more accessible design
- Ensure long-term sustainability by permitting flexible funding for internal rental subsidies and resident services operating reserves
- Guarantee successful implementation by requiring developers to engage in tiered technical assistance.

Ultimately, these recommendations do not replace the Trust Fund's core mission but rather strengthen its ability to fulfill existing goals of affordability, equity, and fair housing choice.