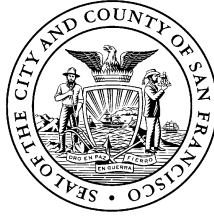


City & County of San Francisco
London N. Breed, Mayor



Office of the City Administrator
Carmen Chu, City Administrator
Nicole Bohn, Director,
Mayor's Office on Disability

April 14, 2023

To: Mayor London N. Breed

From: Nicole Bohn, Director
Mayor's Office on Disability


Re: Transmittal Letter: *Housing Delivery Assessment and Improvement Plan in Response to Mayoral Executive Directive 23-01: Housing for All*

Dear Mayor Breed:

The Mayor's Office on Disability is pleased to submit our responsive process improvements in support of Executive Directive 23-01: Housing for All.

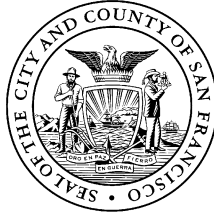
Please let me know if I may assist in answering any questions you may have.

Respectfully Submitted,


Nicole Bohn, Director
nicole.bohn@sfgov.org
415 554-6785 (direct)

Cc: Carmen Chu, City Administrator
Jennifer Johnston, Deputy City Administrator
Judson True, Director of Housing Delivery, Mayor's Office

City & County of San Francisco
London N. Breed, Mayor



Office of the City Administrator
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Mayor's Office on Disability



Housing Delivery Assessment and Improvement Plan in Response to Mayoral Executive Directive 23-01: Housing for All

Mayor's Office on Disability

Submitted by: Nicole Bohn, Director
Supported by: Joseph Ospital, Housing Coordinator Liaison
April 28, 2023

The following outlines the Mayor's Office on Disability (MOD) Housing Delivery Assessment and Improvement Plan which, when implemented, will assist in meeting the deliverables outlined in Executive Directive 23-01: Housing for All.

I. **Role of the Mayor's Office on Disability:**

The [Mayor's Office on Disability](#) serves as the overall Americans with Disabilities Act (ADA) coordinator for the City and County of San Francisco. As such, MOD's primary charge is to oversee compliance with the ADA (as amended) and other state and local accessibility laws, as aligned with [Section 2A.22 of the San Francisco Administrative Code](#). Non-adherence to these access laws places the City at risk for litigation, and, given the overlay of people of color within San Francisco's disability community (64%), is counter to Citywide racial equity initiatives.

Specific to affordable housing, MOD's oversight role includes, but is not limited to:

1. Mitigation of grievances filed by persons with disabilities living in affordable housing settings;
2. Architectural barrier removal;
3. Department-level capacity building and training related to implementation of access laws related to affordable housing, reasonable modifications, and non-discrimination practices; and
4. Proactive Citywide accessibility coordination, in order to:
 - a. promote adherence to accessibility laws and effective best practices within local legislation sponsored by the Board of Supervisors or the Mayor;
 - b. meet or exceed Citywide obligations via the ADA related to annual and ongoing architectural and programmatic accessibility self-assessment and remediation obligations;
 - c. purchase or lease accessible and barrier-free City real estate (including affordable housing where applicable); and
 - d. solve longstanding accessibility conflicts between departments that may slow interagency projects, as well as Citywide architectural or programmatic accessibility progress as a whole.

In addition to these responsibilities, during our tenure as a housing delivery agency, MOD provided affordable housing accessibility plan review and inspection services on behalf of the Department of Building Inspection (DBI). While this work resulted in exceptional provision of accessible features for people with disabilities living within our Citywide Affordable Housing portfolio, lack of available funding to support DBI's work made meeting MOD's other oversight

responsibilities difficult to achieve. In addition, this resulted in a bifurcated permitting process wherein contractors and other housing representatives did not have opportunity to receive expedited services directly at the Permit Center.

Beginning July 1, 2023, MOD will return accessibility plan review and inspection services for Affordable Housing projects to DBI. MOD's role as an Affordable Housing Coordination Department intends to continue, as support to all applicable matters pertaining to MOD's role as defined above, and as convenor and primary driver of the proposals identified in Section VI: Process Improvements: Proposed

II. **Current Performance Assessment:**

While MOD's role as a direct Affordable Housing delivery agency expects to change as of July 1, 2023, accessibility plan review and approval for projects submitted to MOD from July 1, 2021 through June 30, 2022 averaged 85% completion within target, meeting our annual Controller's Office Performance Metric of 85% of all accessibility plan reviews completed within 20 days.

Plan review staff spent an average 3-6 hours a week communicating with the project applicant discussing the California Building Code, Universal Federal Accessibility Standards, 2010 ADA Standards and other applicable standards for their project through the 20-day plan review process.

Regarding MOD inspection services from July 1, 2021 through June 30, 2022, MOD exceeded our annual Controller's Office Performance Metric of 95% of all requests for inspection scheduled within 7 days.

III. **Housing Coordinator:**

During our tenure as a Housing Delivery Agency, MOD's Housing Coordinator has served as a critical liaison in order to highlight, elevate and resolve accessibility-related conflicts as quickly as possible. Beginning July 1, 2023, the MOD Housing Coordinator Role will participate specifically to oversee the Proposals identified in Section VI, below, continuing our efforts to streamline affordable housing so that accessibility for people with disabilities remains prioritized, but is never a bottleneck.

IV. **Process Improvements: Achieved**

Through our tenure as a housing delivery agency, MOD made significant progress in response to process improvements outlined in ED 17-02. Our highlighted accomplishments include:

1. Internal collaboration with MOD Architectural Access Staff to identify and apply consistent interpretation and application of state and federal disability access laws, resulting in more efficient plan review and inspection processes and fewer exchanges of plan sets and need for corrective actions.

2. Developed and implemented procedures for no cost MOD Pre-Application meetings with development teams, to discuss specific code questions and other project-specific issues which may trigger State or Federal accessibility requirements.
3. Created, implemented and distributed [MOD Information Bulletins](#), addressing the most common features within Affordable Housing where questions in access code applications arise:
 - a. MOD-01 - Storage Comparability for Mobility Units
 - b. MOD-02 - Calculation Methods for Kitchen Storage in Mobility Units
 - c. MOD-03 - Removable Cabinetry at Mobility Units
 - d. MOD-04 - Emergency Two-Way Communication Call Stations
 - e. MOD-05 - Residential Two-Way Voice Communication Systems
 - f. MOD-06 - Residential Dwelling Units with Communication Features
 - g. MOD-07 - Reinforcement and Clearances for Grab Bars and Shower Seats in Residential Dwelling Units
 - h. MOD-08 - Reach Ranges to Operable Parts
 - i. MOD-09 - Doors, Doorways, and Gates (CBC Chapter 11B)
 - j. MOD-10 – Passenger Loading Zones
4. Updated the [MOD Architectural Access website](#) to provide clear, direct access to Accessibility Codes and Standards for Affordable Housing providers, and the general public.
5. Created, implemented and distributed Citywide Standards for [Accessible Passenger Loading Zones](#) in partnership with Public Works and the San Francisco Municipal Transportation Agency (SFMTA), for faster, streamlined implementation at affordable housing sites and within the public right of way.
6. Received access to the Department of Building Inspection Permit Tracking System, allowing MOD to update Plan Review comments issued or completed in real time.

V. **Process Improvements: Proposed**

Specific to MOD's role as defined in Section I items 1-4, above, MOD will:

1. Develop and provide training for Plan Review staff and for Building Inspectors and Disabled Access Coordinators at SFDBI, PORT, SFDPW, SFMTA, SFRPD and SFPUC, reviewing all applicable accessibility codes and standards (UFAS, FHA, 2010 ADAS, ABA, ANSI 117). **Proposed Timeline: Begin responsive training development Q1 2023 and Ongoing. First training provided no later than Q2 2023.**
2. Develop and provide housing-related training for Departmental ADA and Affordable Housing Providers throughout CCSF, highlighting all applicable accessibility codes and standards. **Development of training for Housing Providers is underway and is expected to be provided in May 2023. Development of training for Departmental ADA Coordinators (to include relevant**

programmatic and architectural information) to begin no later than Q1 2023, concurrent and congruent with proposal 1, above.

3. Provide support with disability access grant research, in partnership with OEWD and OCII for developers and stakeholders. **Proposed Timeline: Begin Q1 2023 and Ongoing, Initial support provided no later than Q3 2023.**
5. Assist with architectural barrier removal and real estate accessibility assessments, where appropriate. **Proposed Timeline: Begin Q1 2023 and Ongoing. Implementable Process Plan developed no later than Q2 2023.**
6. Regularly convene workgroups to resolve housing specific accessibility conflicts as elevated through the Housing Coordinator monthly meetings, collaboratively developing procedures and/or design standards for application where appropriate. **Proposed Timeline: This is an ongoing charge that happens now and will continue to be prioritized in real time as accessibility issues arise within the Affordable Housing portfolio.**
7. Continue to proactively work with DPW, SFMTA, PUC, RPD and the PORT to resolve differing interpretations specific to Affordable Housing Projects and the accessibility requirements within the public right of way, collaboratively developing standards for implementation where appropriate. **Proposed Timeline: This is an ongoing charge that will be prioritized in real time as accessibility issues arise within the Affordable Housing portfolio. Current monthly and quarterly meetings regarding the public right of way are underway bi-monthly as of December 2022.**
8. Memorialize the Importance of maintaining Disabled Access standards within Affordable Housing, through a MOD-DBI Transition Memo. Upon transition, convene quarterly check-ins with DBI leadership and the Mayor's Director of Housing Delivery to ensure this importance is maintained. **Proposed timeline: Underway, to be completed no later than May 31, 2023.**
9. In collaboration with DBI, update relevant public communications, including but not limited to information hosted on the MOD website, to reflect the Citywide Affordable Housing accessibility plan review and inspection process workflow in effect as of July 1, 2023. **Proposed timeline: To be completed no later than June 30, 2023.**

VI. **Capacity Assessment Plan:**

In MOD's continuing role as the City's overall ADA Coordinator, it is anticipated that the staffing structure proposed to be in effect as of July 1, 2023 will be sufficient to be responsive to this Directive, and to continue in our Housing Coordinator Role as proposed.