



Senior Housing

Providing Affordable Homes for Older Adults in Housing Credit Properties

2025

Households of older adults, many of whom are on a fixed income, face not only a crisis of affordable housing, but also a lack of housing that accommodates their needs as they age. According to the Harvard University Joint Center for Housing Studies 2025 *State of the Nation's Housing* report, 58% of older adult renters or 4.5 million households were cost burdened in 2023.¹ At the same time, according to the American Community Survey, the number of senior households is expected to increase in the coming two decades. Those that are considered severely cost burdened, defined as those that are spending more than half of their income on housing will also continue to grow, having already nearly doubled, from 5.2 to 11.7 million households between 2000 and 2020². These trends will further intensify the future demand for affordable and accessible housing.

Housing Finance Agencies (HFAs), which offer key financing programs such as the Low Income Housing Tax Credit program (Housing Credit), provide a vital capital subsidy that encourages developers to build and renovate affordable and accessible rental housing for this growing cohort of older adults with limited income.

The following analysis, which examined 53³ Qualified Allocation Plans (QAPs) released before July 2025, reveals how HFAs are providing affordable and accessible housing for older adults through the Housing Credit program. Our findings show that HFAs are utilizing the flexibility of the Qualified Allocation Plan to encourage or require certain accessible design requirements, on-site services, and access to nearby amenities for older adults.

Defining Housing for Older Adults

Research, policies, programs, and HFAs all vary on how they define older adults. These differences can impact who is counted, who is eligible to receive benefits and who has access to affordable housing. **28 HFAs explicitly use the Fair Housing Act (FHA) definition⁴ of senior housing in their QAPs.**

28 OUT OF 53 HFAs

use the Fair Housing Act definition of Housing for Older Persons.

¹ Older renters defined as those age 65 and older. <https://www.jchs.harvard.edu/blog/one-three-older-households-cost-burdened>

² According to American Community Survey data 2019

³ All 50 states, plus DC, New York City and Chicago

⁴ The Housing for Older Persons Act of 1995, amends the Fair Housing Act (FHA) of 1968, and defines housing for older persons as:

- a) provided under any State or Federal program that the Secretary determines is specifically designed and operated to assist elderly persons (as defined in the State or Federal program); or
- b) intended for, and solely occupied by, persons 62 years of age or older; or
- c) intended and operated for occupancy by persons 55 years of age or older, and—
 - (i) at least 80 percent of the occupied units are occupied by at least one person who is 55 years of age or older....

Accessibility in Housing Credit Properties

To offer a safe home for older adults to age in place, affordable housing must be accessible.⁷ **Forty-two HFAs include some reference to accessible design elements in their QAP**, either by requiring or incentivizing accessible housing for older adult residents. Of the 42 HFAs that reference accessible design elements in the QAP, 19 HFAs include a general statement to encourage or require accessibility requirements in their QAP, whereas 23 HFAs have included specific building or unit design elements such as grab bars, roll-under counters, bathrooms with roll-in or seated shower stalls or tubs, clearance areas within various common and individual rooms as well as accessible signage throughout the property.

42 OUT OF
53 HFAs

explicitly reference
accessible design
elements in the QAP.

Several HFAs rely on third-party design standards to accommodate accessible home construction that may offer more comprehensive or detailed accessibility requirements than those in the Fair Housing Act. For example, the American National Standards Institute (ANSI) for *Accessible and Usable Buildings and Facilities* is voluntary, yet it has become the foundation for many state and local building codes and is referenced by the American Disabilities Act. **Eight HFAs explicitly reference the ANSI accessibility standards for Housing Credit property production or preservation in their jurisdiction.** Twelve HFAs reference other accessibility standards such as The Kelsey Inclusive Design Standards in Washington, D.C. or the 7 Principles of Universal Design in South Dakota. Ten HFAs mention the Uniform Federal Accessibility Standards (UFAS) with further references to the Fair Housing Act guidelines or design manual.

8 OUT OF
53 HFAs

reference the ANSI
standards for accessible and
usable building design.

The Fair Housing Act requires a minimum 5% of accessible units that must be made accessible for those with mobility disabilities as well as an additional 2% of units that must be made accessible for those with communication disabilities in multifamily housing.⁸ **HFAs across 23 states and localities make explicit mention of these minimum requirements with:**

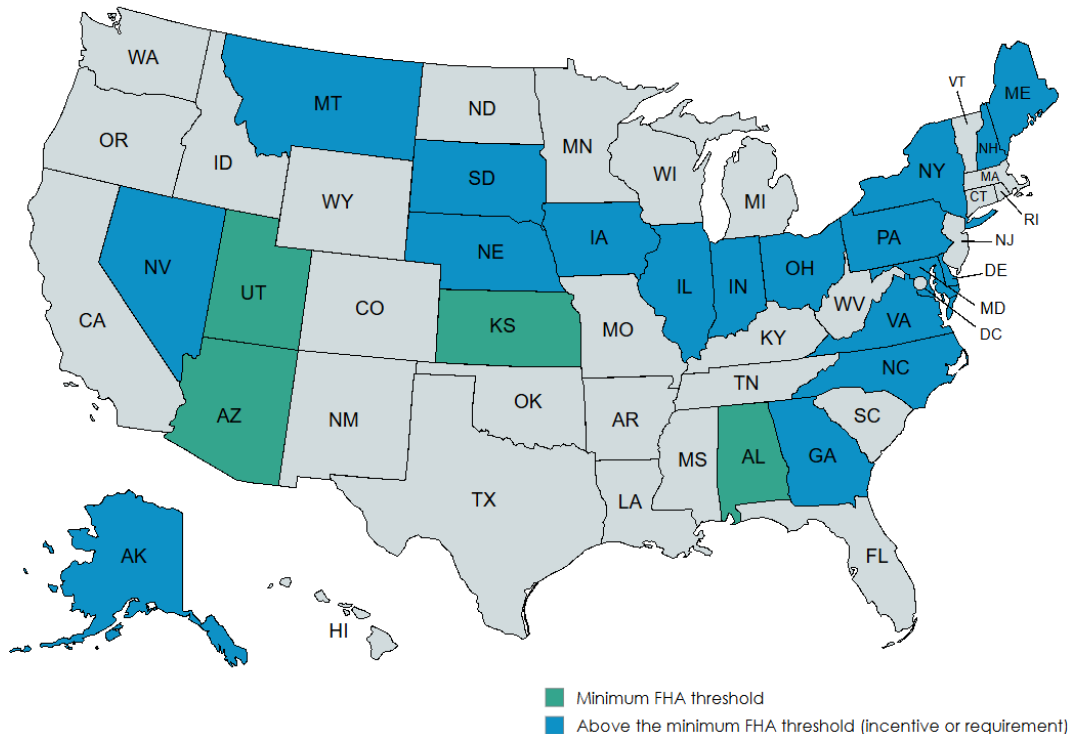
- Alabama and South Dakota awarding points for meeting the minimum requirements;
- Six states (Alaska, Arizona, Georgia, Iowa, Kansas and Utah) explicitly mentioning the minimum requirements as part of the threshold criteria;

⁷ The FHA proactively establishes seven design and construction requirements for new construction multifamily housing, such as Housing Credit properties, built for first occupancy after March 13, 1991. These design and construction requirements are to ensure public spaces and individual apartments or homes are accessible to people with disabilities. Learn more at: Accessibility Requirements, Department of Housing and Urban Development (<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-additional-requirements/fair-housing-and-equal-access/accessibility-requirements/>) Accessed September 10, 2025.

⁸ Accessibility Requirements, Department of Housing and Urban Development (<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-additional-requirements/fair-housing-and-equal-access/accessibility-requirements/>) Accessed September 10, 2025.

- Twelve states (Alaska, Delaware, Illinois, Indiana, Maine, Nebraska, Nevada, New Hampshire, New York, Pennsylvania, South Dakota and Virginia) offering points for applicants who achieve a greater percentage of accessible units for those with mobility and communications disabilities; and
- Eight states (Georgia, Illinois, Iowa, Maryland, Montana, Nebraska, North Carolina and Ohio) implementing a threshold requirement of accessible units greater than the minimum requirements set forth in the Fair Housing Act.

FIGURE 2: HFAs that Meet or Exceed Accessible Unit Requirements



Some HFAs not only require accessible units, rather, Mississippi, Missouri, Montana and Rhode Island also require Housing Credit applicants to provide adaptable homes for older adults to age in place. These homes, as the name suggests, can have different features adapted or modified, based on the ongoing and changing needs of the resident. For example, walls may need to be reinforced in the bathroom during initial construction to allow for grab bars, but the grab bars themselves do not need to be installed prior to occupancy. Maryland, Massachusetts and Michigan also require homes that are visitable to those with mobility limitations, but not necessarily for day-to-day living, in addition to accessible unit requirements. Illinois requires accessible, adaptable, and visitable Housing Credit properties.

Supporting Disabled and Veteran Populations

HFAs not only meet or exceed the minimum accessibility requirements as laid out in the Fair Housing Act and their respective QAPs, but also target units for populations with special needs, special populations or service-enriched housing. These terms encompass several populations, including but not limited, to older adults, disabled, veteran or at-risk of homelessness. Each state incentivizes the provision of Housing Credit units towards these populations differently, with Arizona, Arkansas, Mississippi, New Hampshire, South Carolina and Utah offering points for a minimum percentage of units set aside for disabled populations. Minnesota, Pennsylvania and Washington, D.C. offer points for project serving disabled populations and Florida implements a 5% set aside of the total Housing Credit authority towards projects that offer affordable housing to disabled populations.

Five states (Arizona, Nevada, New Hampshire, Utah and Wisconsin) offer points for a minimum percentage of units set aside for veterans. Illinois has a mandatory preference for veteran populations on the waiting list, while Alaska offers points if applicants provide a written commitment to preferencing veterans in their tenant selection criteria.

Delaware has a minimum threshold of 5% of units set aside for special populations, whereas Hawaii offers points for projects providing housing for tenant populations with special needs. Louisiana has a similar minimum threshold of 5% of units for special needs populations, in addition to points. Maine, Maryland, Massachusetts and West Virginia offer points for meeting the minimum 20% set aside for special needs. Missouri offers a basis boost, and South Dakota offers points, for service-enriched housing, including senior housing.

On-Site Services for Older Adults

On-site services offer older adults convenience as well as access to programming tailored to the specific needs or desires of the resident population. Off-site services may allow residents to meet others in the community but may be challenging to access for some older adults. Advocates for affordable housing for older adults do encourage operators to provide on-site services for residents in a community room or similar area.

Twenty-two HFAs incentivize a range of services targeted towards older adults, with 12 HFAs specifying on-site health-related services. New Hampshire requires a health clinic that provides a minimum number of hours of service per unit. This may include flu shots, blood pressure, cholesterol and diabetes screening and foot care. Missouri, Nebraska, New Jersey and New Mexico also incentivize regular home health visits with a similar range of health screenings. California, Georgia, Indiana, Tennessee, Texas, Washington, D.C and West Virginia also encourage the provision of on-site health related services for the older adult resident population. Texas also encourages

12 OUT OF
53 HFAs

provide on-site health services to older adult resident populations.

Housing Credit property owners to offer weekly in-home chore services for older adults.

Recognizing the limitations of providing on-site services and amenities, Arizona, Delaware, Kansas, Missouri, Michigan, Nebraska, New Jersey, Texas and Utah also require Housing Credit owners to provide dedicated transportation to older adult residents to services such as:

- Grocery stores and pharmacies;
- Community / social events; and
- Senior Centers.

9
OUT OF
53 HFAs

require additional transportation services for older adult resident populations to access nearby amenities and services.

Conclusion

As our population of older adults continues to grow, those who are on fixed incomes and are unable to pay market rate prices for rental homes will require affordable and accessible homes. Housing Finance Agencies, through the Housing Credit program, can require and incentivize sufficient and accessible housing for older adults in addition to providing valuable supportive services to allow residents to thrive in their twilight years.

Learn more about how QAPs can accelerate affordability, expand opportunity, and encourage the resilience of affordable housing on our [QAP analysis home page](#).