

Accessibility Barriers for Students with Disabilities Navigating Housing Insecurity



california
homeless
youthproject

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INTRODUCTION

The objective of this publication is to highlight accessibility barriers for students with disabilities who have experienced homelessness or housing instability. This publication includes terminology and key legislation, a high-level overview of housing and educational accessibility issues, and conclusions and recommendations to better understand and support this community.

TERMINOLOGY & KEY LEGISLATION

This section contains definitions of terminology and overviews of key legislation to help stakeholders better understand discussions surrounding accessibility barriers. Each term contains a brief description below.

The Americans with Disabilities Act (ADA) of 1990

The Americans with Disabilities Act prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public places. The civil rights granted under the ADA are the same as those granted to individuals based on sex, age, race, religion, and national origin. Under Title III of the ADA, colleges must provide equal access to all students, including those with disabilities. The ADA defines an individual with a disability as “a person who has a physical or mental impairment that substantially limits one or more major life activities.” This includes people who may have a disability, but no record of such impairment, meaning people who experience living with a disability but might not have a diagnosis, medical, or legal record being disabled.¹

Rehabilitation Act of 1973, Section 504

Section 504 prohibits discrimination against individuals with disabilities. It ensures that children with disabilities have equal access to education and housing, including accommodations and modifications. Institutions that receive federal funding must adhere to Section 504. (Regardless of whether a school receives federal funding, it must abide by the ADA). Section 504 mandates that 5% of housing units be accessible for mobility disabilities and 2% be accessible for visual and hearing disabilities² despite 14% and 6% living with these disabilities, respectively. Section 504 prevents institutions from excluding or denying individuals with disabilities by providing an equal opportunity to receive program benefits and services.³ For example, Section 504 requires schools to provide audio transcripts and video captioning for people who are deaf or hard of hearing. Additionally, postsecondary schools must adhere to the Web Content Accessibility Guidelines (WCAG) to make their digital environments fully accessible.

Reasonable Accommodations

Reasonable Accommodations are adjustments or modifications provided to individuals with a disability, enabling participation in education, financial aid, housing, employment, transportation, counseling, and medical services. Institutions are mandated to provide reasonable accommodations following the U.S. standards and regulations for accessibility addressed in the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973.⁴

Fair Employment and Housing Act (FEHA)

The Fair Employment and Housing Act is a California law that protects people from housing discrimination and some sources of income based on categories including race, color, national origin, religion, disability, sex, gender identity, familial status, and sexual orientation. The latest amendment to the law regarding source of income protections adds people using a federal, state, or local housing subsidy to this list of protected groups. This means, as of January 1, 2020, housing providers, such as landlords, cannot refuse to rent to someone or otherwise discriminate against them because they have a housing subsidy to help them to afford their rent.⁵

The World Wide Web Consortium's WCAG

WCAG is the universally accepted technical guidelines for web accessibility broken into three levels: level A, AA, and AAA. Level AA is the recommended level for most institutions' standards and regulations⁶, with requirements including web page specified color contrast, alt text images descriptions that convey meaning, site consistent navigation elements form fields with accurate labels, screen reader accessible status updates, and headings used logically.

Fair Housing Amendments Act of 1988

The Fair Housing Act of 1988 prohibits discrimination by direct providers of housing (such as landlords and real estate companies, municipalities, banks or other lending institutions, homeowners, and insurance companies) based on race or color, religion, sex, national origin, familial status, or disability. It is important to note that the Fair Housing Act does not pertain to housing structures built prior to 1991. In very limited circumstances, the Fair Housing Act exempts owner-occupied buildings with no more than four units, single-family houses sold or rented privately by the owner, and housing operated by religious organizations and private clubs that limit occupancy to members.⁷

Homelessness

We recognize homelessness to be defined as children, youth, students, individuals, and families who lack a fixed, regular, and adequate nighttime residence. This definition is inclusive of those sharing the housing of other persons due to loss of housing or economic hardship, those living in motels, hotels, trailer parks, or shelters, those whose primary nighttime residence is a place not designed for or ordinarily used as a regular sleeping accommodation for human beings, and those who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings. Table 1 below highlights the qualifiers of homelessness for the U.S. Department of Housing and Urban Development (HUD),⁸ Homeless Management and Information System (HMIS),⁹ and McKinney-Vento Act.¹⁰ Green check marks indicate the situation listed is included in the correlating definition, gray x's indicate the situation is excluded from the correlating definition, and the yellow check mark indicates the inclusion is situational.

Table 1: Qualifiers of Homelessness

	HUD (PIT/HIC)	HMIS	McKinney-Vento
Residing in a Place not Meant for Human Habitation			
- Street, Bus/Train Station, Abandoned Building	✓	✓	✓
- RV/Shelter with No Plumbing or Electricity	x	✓	✓
- Substandard Housing	x	x	✓
- Tent, Car, Encampment	✓	✓	✓
Temporary Housing			
- Emergency/Congregate Shelter and Safe Haven	✓	✓	✓
- Transitional Housing Hotels/Motels Paid by Programs	✓	✓	✓
- Exiting Institution (e.g., jail, hospital)	✓	✓	✓
- Abandoned in Hospital	x	x	✓
Permanent Housing Projects			
- Permanent Supportive Housing	x	✓	(✓)
- Housing Only	x	✓	✓
- Rapid Rehousing	x	✓	✓
Shared Housing			
- Doubled or Tripled Up	x	x	✓
- Couch Surfing	x	x	✓



Accessibility Issues for Disabled Students

Those who find themselves at the intersection of homelessness and disability face a myriad of compounding obstacles in finding affordable housing. Additionally, there are financial constraints of income and asset limits, barriers to accessing health insurance and jobs that pay a living wage. For this demographic, the design and construction of indoor and outdoor facilities can prevent access to school, medical treatment, shopping, and finding or keeping a job.¹¹ Footpaths, parks, sidewalks, and public transportation may also be inaccessible, preventing some people with disabilities from engaging in the most basic elements of everyday life.

In an effort to learn from lived experiences, the California Homeless Youth Project hosted virtual surveys, focus groups, and individual interviews with a total of 124 California students who identified as having a disability and had experienced housing insecurity. Students were asked questions regarding the services and support available to them. The survey and focus group addressed issues of food security, housing, employment, safety, and financial security.

The word cloud below displays the 20 most frequent keywords sourced from the participants, noting that barriers to accessibility and housing were prominently mentioned by the students when asked about their experiences. Feedback was organized into four categories: Education, Housing, Income and Services. Lived experiences from each category are defined below.

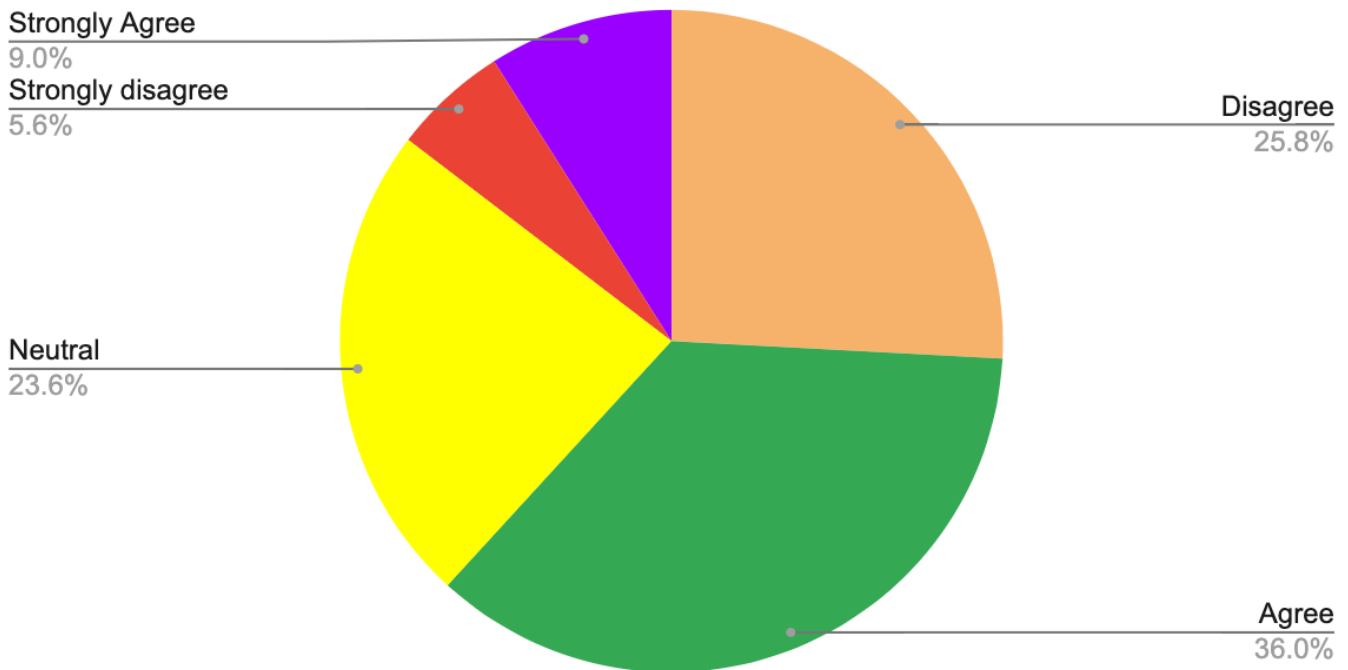


EDUCATION

Students with disabilities noted systemic challenges while navigating educational attainment. A few barriers reported within the survey and focus groups were application processes, lack of diversity in staffing, limited provider capacity, and discrimination. The presence and combination of these issues increase the difficulty in students being able to both request and obtain accommodations.

Barriers to accommodations were found in the lack of student knowledge or awareness of campus resources, the inability to provide “appropriate” documentation of a disability, the inability to receive accommodations students found useful, and the negative reactions of peers and faculty members that students experienced upon their disclosure of a disability or their request to implement accommodations. When asked if they were aware of the necessary documentation needed for receiving disability-related accommodations, less than half of the students identified affirmatively. Additionally, almost 40% of respondents indicated they are unsure of where they could obtain support for a diagnosis or accommodations off campus if necessary.

I am aware of the necessary documentation needed for receiving disability related accommodations



Samantha Nickles, a graduate of Humboldt State University and a youth coordinator at Tri County Independent Living, shared her experience with accessibility barriers for students that required accommodations related to transportation. In her interview she stated:

“If you have a disability that limits your mobility, for example, there are a lot of buildings here [at Humboldt State University] that are not retrofitted with elevators or ramps. They are not ADA accessible. Cal Poly Humboldt itself doesn’t have an entirely accessible campus. Their solution is to just shuttle students around in a van, which is impractical and very difficult for students to use.”

Accessibility barriers at college campuses are not just limited to mobility and transportation-related issues. In terms of learning accommodations, some students with disabilities who require pragmatic solutions in order to have the same opportunities as their peers, such as documents printed in larger text or more time to complete assignments and tests, are not accommodated by their university and instructors.



HOUSING

In addition to barriers related to education, youth and students who are disabled and experiencing houselessness or housing instability also encounter obstacles related to housing. These obstacles include, but are not limited to high rent, low availability, competitive housing market, and inaccessibility. The average fair market rent (FMR) for a studio apartment in California is \$1,205 a month, with FMR in the San Francisco Bay Area reaching over \$2,100 a month,¹² while the maximum Supplemental Security Income (SSI) payment is only \$1,040.21 a month.¹³

Across California, housing markets are strained by upward pressure on prices due to high demand.¹⁴ Even though only 55.3% of California homes were occupied in 2020,¹⁵ there is still a significant housing deficit for low-income families and individuals. In terms of overcrowded homes, meaning a living space where there are more occupants than there are rooms, California has the highest rate of any state with 13.6% of renter-occupied homes qualifying as overcrowded.¹⁶ The high instance of overcrowding in California is a byproduct of the lack of affordability in the housing market, resulting in residents needing to make accommodations by renting spaces that are already at capacity or sharing spaces to afford the cost.



Individuals with disabilities seeking housing experience additional disadvantages due to the competitiveness of the housing market. Landlords are not incentivized to renovate their spaces to comply with ADA accessibility laws. Retrofitting buildings to meet ADA compliance is often expensive and can be a long process. Instead of attempting to meet the ADA's standards, landlords are able to lean into the competitive housing market and avoid spending the time and money to make their living spaces accessible to those with disabilities. Emphasized throughout the survey, focus groups, and interviews was the difficulty that exists for people with disabilities to find affordable and accessible housing. It was reported in one interview that young adults with a disability (visible or not, diagnosed, or undiagnosed) in the San Luis Obispo, Santa Barbara, and Ventura counties, or Tri-County Area, rarely find independent housing that is within their price range.

Dormitories and student housing are available for a percentage of enrolled students at all 10 University of California campuses, all 23 California State University campuses, and at 11 of the 115 California Community Colleges. For those students navigating homelessness, limited emergency housing opportunities are available at 6 University of California campuses, 19 California State University campuses, and 1 California Community College with 14 additional campuses receiving grant funding in 2020 to create rapid rehousing opportunities.¹⁷ On average, California has enough dedicated housing for only 1 out of every 7 youth experiencing homelessness,¹⁸ with no indication as to the percentage that are actually accessible. In order to make resources more accessible, our 2020 publication [Emergency Housing, Food, & Financial Resources for Undergraduates at California's Public Colleges and Universities](#) compiled lists of basic needs resources offered to undergraduates.

INCOME

Stable and robust income is vital for education and housing in California. While California’s minimum wage is \$15 an hour, employees with disabilities can be paid less than \$2 an hour under the subminimum wage umbrella. Additionally, the majority of working-class people with disabilities are in need of employment that provides reasonable accommodations, flexible scheduling, and is easily accessible via public transportation. Over 70% of students who participated in our survey stated that they were working for equal to or less than \$10 per hour. However, new wage regulations were signed into California law under SB 639 in September 2021. SB 639 requires workers with disabilities to be “paid at least the state’s minimum wage by 2025,” and mandates the creation of a state plan identifying how to help workers with disabilities get the services and support needed to obtain jobs that pay a wage that allows them to become financially independent.¹⁹



Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) are additional potentials for individuals and students with disabilities. As briefly mentioned above, the maximum SSI payment is \$1,040.21 a month. However, the average monthly SSI payment for recipients in March 2022 was only \$625.50.²⁰ SSI benefit payments are calculated by subtracting countable income (employment or other income) from the maximum benefit. Working students under age 22 can take some of their income out of the countable income calculation under the Student Earned Income Exclusion (SEIE). This exclusion allows students to keep the first \$2,040 in earnings each month without affecting the countable earned income calculation with an annual

cap of \$8,230.²¹ However, it is important to note that this potential income takes anywhere from three months to over two years for a final disability determination with only a 20% rate of initial approval and a 2% rate of approval by reconsideration or appeal.²²

Social Security Disability Insurance (SSDI) is a federal program that gives monthly cash benefits to people who have worked, paid Social Security taxes, and now have disabilities that prevent them from working.²³ An important distinction from SSI is that SSDI is a Medicare-based insurance program that has qualifiers based solely on disability determination by the Social Security Administration and the candidate's work history. A candidate for SSDI must have worked long enough to qualify for these benefits. There are exceptions to this if they have not worked because of a disability occurring before the age of 22, are the child of a deceased parent that received benefits²⁴ or are the spouse or ex-spouse of someone who qualified prior to their death. If utilized concurrently, SSDI benefits can reduce the SSI payment, or cause ineligibility



SERVICES

Service access and delivery can have unintentional programmatic barriers for individuals with disabilities. These barriers persist when physical, hearing, speaking, reading, writing, and/or comprehension accessibility is not fully considered. Examples of persistent barriers include, but are not limited to, materials using small print, materials with no Braille or screen reader versions, videos/virtual meetings absent of captioning/transcripts, oral communications without interpreters, use of technical language and long/compound sentences, inconvenient scheduling, lack of accessible equipment/tools/supplies, insufficient time set aside for appointments/meetings, steps or stairs to enter a building or room, and narrow door or hallway passages.²⁵

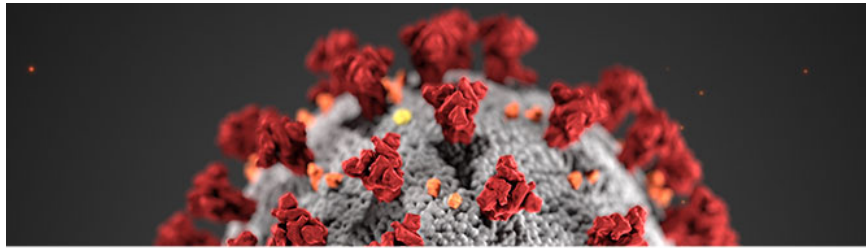


Food security requires physical and financial access to food that meets daily nutritional needs. Research has shown that food insecurity contributes to chronic illness, anxiety, depression, and long-term emotional dysregulation.²⁶ Over 70% of respondents stated that they often could not afford to eat balanced meals in the last month, while 50% reported they are never or rarely sure where their next meal is coming from.

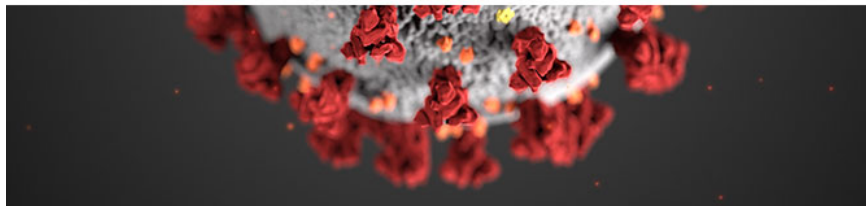
Access to public transportation is essential for disabled students. Almost 80% of respondents required public transportation to access one or more essential services (such as housing, meals, or disability-related resources). Student respondents identified that public transportation must have accessible and safe boarding and deboarding locations, with trained staff to assist with securing the safety of riders with disabilities.

When accessible public transportation is not available either due to location or lack of disability-related accommodation, students with disabilities report utilizing services such as Paratransit. However, Paratransit trips must often be reserved one to two days in advance.²⁷ Even when Paratransit services might operate at peak efficiency, they require planning and scheduling rather than on-demand service. Moreover, not all people with disabilities are eligible as Paratransit is reserved only for those unable to use fixed-route services. The application process can further deter some potential Paratransit riders from applying, especially youth, as youth advocate workers report it being difficult and frustrating. Vanessa Acain, a youth advocate worker for ILRU Ventura, said: “Youth are stuck at home and don’t have PCA (personal care assistant) access due to quarantine. [Nor do they have access to] vaccines, or resources for housing—nobody specializes in accessible housing.” This lack of access to housing and personal care assistants in conjunction with Covid-19 created a larger gap in support for youth needing access to transportation.

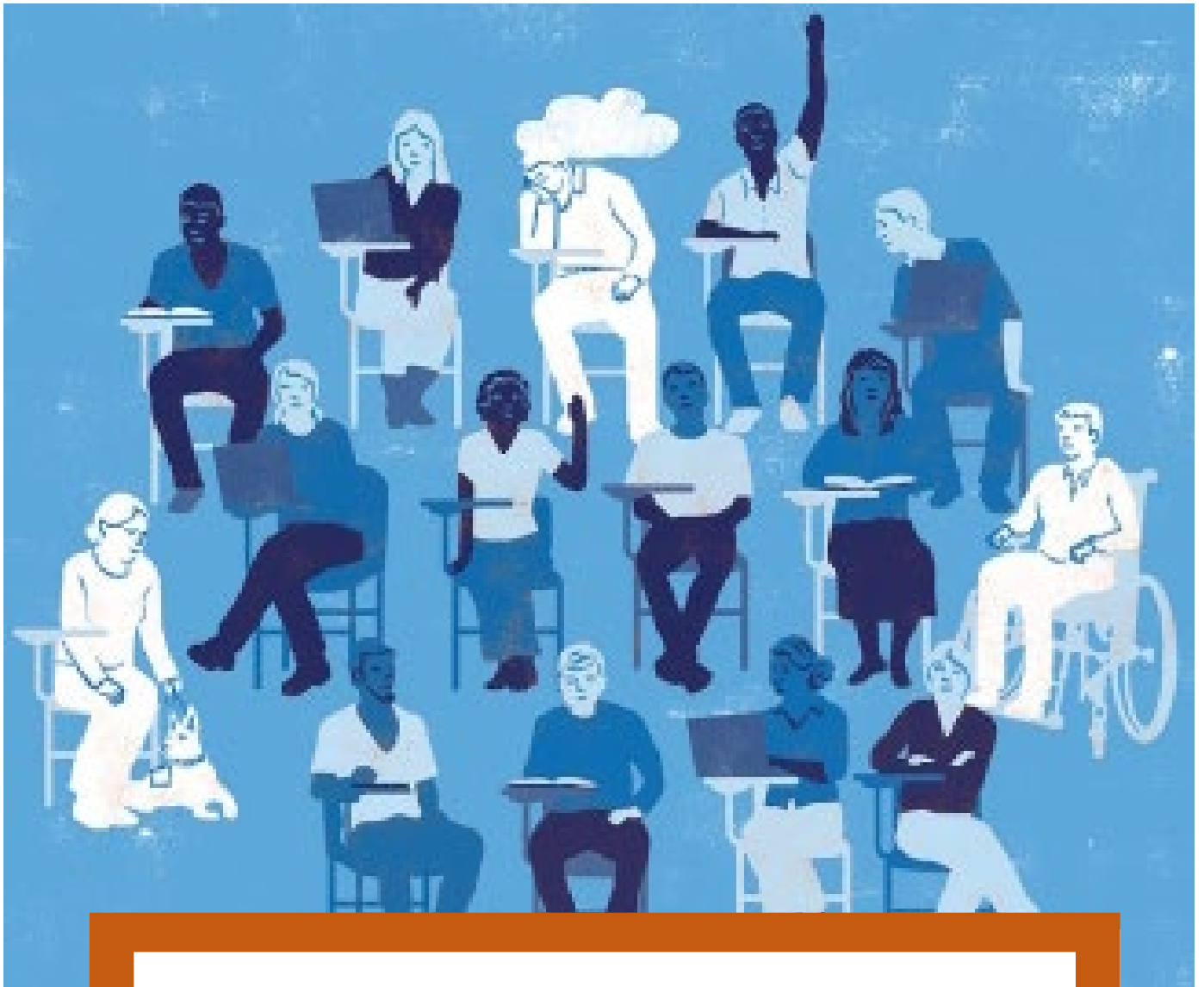
The Covid-19 pandemic had a substantial effect on the ability of the California Homeless Youth Project to research the intersection of disability, homelessness, and higher education. Existing accessibility barriers have been exacerbated and new ones have surfaced as a result of the pandemic.



LIBRARY FACILITIES CLOSED
DUE TO COVID-19 PRECAUTIONS



For example, in March 2020, 99% of public libraries in California were closed to comply with stay-at-home orders.²⁸ Public libraries are sometimes the only source of electricity, computer, and/or internet access for individuals and students experiencing homelessness, housing instability, or financial insecurity. Public libraries closing left many individuals unable to access online resources that are aimed at providing support for people experiencing homelessness or housing instability. For the California Homeless Youth Project, this barrier limited our capacity to recruit participants and conduct research on an individual basis. Oftentimes, individuals were not able to attend online meetings intended for furthering this intersectional research effort.



Recommendations

The recommendations of this publication emphasize that the intersectional problems of unmet basic needs for students with disabilities require equally intersectional solutions. These solutions must be guided by further work to highlight the lack of accessibility, equity, and support for students with disabilities facing housing insecurity. These recommendations are amplified from youth/students, provider, and community voices.

As a main foundation, intentionally include people with disabilities throughout policy creation and processes that impact them. “Nothing about us, without us” has been a focal concept in the disability rights movement since the 1960s, echoing the sentiments of people with disabilities who demand community-led efforts for autonomy in decision-making and access to services.²⁹

Education

- Institute “Education Transition Liaisons” to assist in the transition from K-12 to higher education:
 - Ensure liaisons are trained and/or connected in accessibility accommodations and housing services.
- Partner with students with disabilities to train disability services staff to understand and develop appropriate accommodations and compensate for their time and expertise.
- Ensure that students know about the existence of disability services staff, and the staff are available to support students with navigating the disability accommodations process.
- Create alternatives to medical documentation of mental health disabilities due to structural barriers that prevent many students from accessing mental health resources.
- Train professors on disabilities and accommodations, including on how to support students requesting accommodations.
- Ensure learning and testing accommodations for students are readily available and easily obtained through clearly defined instructions on where and how to apply for accommodations.
- Make all classes physically accessible through ADA compliant classrooms and lecture halls, as well as offering ongoing hybrid online course options.
- Partner with community service organizations and allocated funding sources to support accessible low-income student housing.
- Establish and maintain internships that pay a living wage and are readily offered and available to students.

Employment

- Implement reasonable accommodations for employees to access their workspace physically through reserved accessible parking and accessible workspaces (for mobility aids as well as any assistive technology).
- Create flexible work schedules to accommodate employees with frequent doctor’s appointments, fatigue, or schedules that are dependent on care support workers.
- Foster an inclusive work environment through training programs, mentorship, and connection opportunities for employees to engage with one another to ensure success.
- Ensure compliance of removing subminimum wage pay for employees with disabilities.

Services and Housing

- Establish affordable, accessible, inclusive, and equitable housing options for people with a wide range of impairments.
- Eliminate asset limits for public assistance, which keep disabled people in poverty.³⁰
- Increase SSI benefits overall and include home health aide pay as part of the necessary cost of keeping people housed and independent.
- Ensure buildings, offices, and rooms are accessible:
 - Access to places of public accommodation from public sidewalks, parking, or public transportation by, for example, installing an entrance ramp, widening an entrance, or creating accessible parking.³¹
 - Make services available by, for example, changing the layout of displays, moving furniture, or using Braille or raised character signage.³²
 - Make public restrooms accessible through accessible hardware and widening partitions.³³
 - Any other measures necessary to make public places accessible.³⁴
- Ensure access to interpreters, TTY (TeleTYpe), TDD (Telecommunications Device for the Deaf), TT (Text Telephone), and/or Video Relay Service for D/deaf or Hard of Hearing individuals.
- Ensure materials (both print and electronic) are accessible to visually impaired individuals through utilization of screen reader-friendly pages, raised character signage, and/or Braille.

CONCLUSION

This publication sought to highlight accessibility barriers by capturing the experiences of 124 California students who identified as having a disability and had experienced housing insecurity, while also capturing accounts from service providers. Students with disabilities who have experienced homelessness and housing instability prior to and throughout the pandemic are expected to navigate and overcome immense barriers. Decreased access to education, accommodations, health care, employment, financial security, and housing stability significantly impedes their safety and ultimately their success. Youth and students should not be ignored, punished, or seen as less than regardless of their ability, gender, orientation, housing status, or race/ethnicity. This is a pivotal time to educate ourselves, lawmakers, higher education system leaders, campus leaders, program staff, faculty, and community organizations on the interwoven disparities affecting youth at the intersection of disability, homelessness, and education, and to work together to strategically dismantle present barriers.

Resources

This section contains resources for those navigating the intersection of disability and homelessness, as well as general information for those wanting to learn more about available services.

- [Independent Locator - Welcome | California State Independent Living Council](#) - find a Center for Independent Living in California.
- [Disabled Student Programs and Services \(DSPS\) Coordinators Directory](#) | - find support and services for students with disabilities.
- [California Community Colleges Chancellor's Office](#) - find support with student affairs in California's community colleges.
- [Services for Students with Disabilities | California State University](#) - find support and services for students with disabilities.
- [Students with Disabilities Services | University of California Office of the President](#) - find support and services for students with disabilities.
- [Disability Benefits | SSA](#) - learn about federal supplemental income and insurance programs for people with disabilities.
- [Disability Rights California](#) - learn about legal rights as well as service access for Californians with disabilities.
- [Housing and Disability Advocacy Program](#) - assist people with disabilities who may be eligible for benefits and housing supports



END NOTES

- ¹ ADA National Network. (2022). [Information, Guidance and Training on the Americans with Disabilities Act](#).
- ² Lake, J., Novack, V., & Ives-Ruble, M. (2021). [Recognizing and Addressing Housing Insecurity for Disabled Renters](#). Center for American Progress.
- ³ U.S. Department of Housing and Urban Development. (n.d.). [Section 504: Frequently Asked Questions](#).
- ⁴ Disability Rights Education & Defense Fund. (2018). [Section 504 of the Rehabilitation Act of 1973](#).
- ⁵ Department of Fair Employment and Housing. (2020). [Source of Income FAQ](#).
- ⁶ W3C Web Accessibility Initiative. (2019). [Accessibility Principles](#).
- ⁷ The United States Department of Justice. (2022). [The Fair Housing Act](#).
- ⁸ Housing and Urban Development Exchange. (n.d.). [Point-in-Time Count and Housing Inventory Count](#).
- ⁹ State of California Business, Consumer Services, and Housing Agency. (n.d.). [Homeless Data Integration System](#).
- ¹⁰ National Center for Homeless Education. (n.d.). [McKinney-Vento Definition of Homeless](#).
- ¹¹ United Nations. (2018). [Persons with Disabilities: Breaking Down Barriers](#).
- ¹² Housing and Urban Development. (2022). [Fair Market Rent](#).
- ¹³ World Institute on Disability. (n.d.). [Disability Benefits 101: California Supplemental Security Income](#).
- ¹⁴ Next 10. (2016). [Current State of the California Housing Market](#).
- ¹⁵ United States Census Bureau. (2021). [Quick Facts: California](#).
- ¹⁶ Next 10. (2016). [Current State of the California Housing Market](#).
- ¹⁷ California Community Colleges. (n.d.). [College Dormitories & Housing](#).
- ¹⁸ California Homeless Youth Project. (2022). [You Count: California Youth Homelessness Dashboard](#).
- ¹⁹ California State Council on Developmental Disabilities. (2022). [SB 639: Ending the Subminimum Wage](#).
- ²⁰ Social Security Administration. (2022). [Monthly Statistical Snapshot](#).
- ²¹ World Institute on Disability. (n.d.). [Disability Benefits 101: California Supplemental Security Income](#).
- ²² Social Security Administration Office of Retirement and Disability. (2018). [Annual Statistical Report on the Social Security Disability Insurance Program, 2018](#).
- ²³ World Institute on Disability. (n.d.). [Disability Benefits 101: California Supplemental Security Income](#).

- ²⁴ World Institute on Disability. (n.d.). [Disability Benefits 101: California Supplemental Security Income](#).
- ²⁵ Centers for Disease Control and Prevention. (2020). [Common Barriers to Participation Experienced by People with Disabilities](#).
- ²⁶ Feeding America. (2022). [Importance of Nutrition on Health](#).
- ²⁷ RTS Access. (n.d.). [What is Paratransit?](#)
- ²⁸ American Library Association. (2021). [The State of America's Libraries 2021: A Report from the American Library Association](#). Steve Zalusky.
- ²⁹ Carmel, J. (2020). [Nothing About Us, Without Us, 16 Moments in the Fight for Disability Rights](#). NY Times.
- ³⁰ Altiraifi, A. (2020). [A Deadly Poverty Trap: Asset Limits in the Time of the Coronavirus](#). The Center for American Progress.
- ³¹ California Commission on Disability Access. (2021). [ADA Compliance - Existing Facilities](#).
- ³² California Commission on Disability Access. (2021). [ADA Compliance - Existing Facilities](#).
- ³³ California Commission on Disability Access. (2021). [ADA Compliance - Existing Facilities](#).
- ³⁴ California Commission on Disability Access. (2021). [ADA Compliance - Existing Facilities](#).



ABOUT THE CALIFORNIA HOMELESS YOUTH PROJECT

The California Homeless Youth Project (CHYP) is a multi-year research and policy initiative of the California Research Bureau at the California State Library. CHYP highlights the experiences of youth experiencing homelessness or housing insecurity in California, engaging directly in research and policy discussions. CHYP amplifies youth experiences and recommendations as well as those of researchers, practitioners, and policy experts. CHYP is supported by the California State Library and receives additional funding and support from The California Wellness Foundation, the Walter S. Johnson Foundation, and Schoolhouse Connection.