



Insights from the City of Los Angeles' Accessible Housing Program

As communities work to expand housing opportunities for persons with disabilities, effective implementation matters.

This policy brief highlights key insights from hundreds of compliance reviews, site visits, and stakeholder interviews conducted during an external audit of the City of Los Angeles' Accessible Housing Program.

Overview

Ensuring that affordable housing is accessible to people with disabilities requires more than constructing accessible units or adopting accessibility policies. It requires creating systems and procedures to identify residents' needs, matching those needs with available housing, supporting property staff, and monitoring implementation over time. Cities across the country are increasingly recognizing the importance of these efforts as they work to comply with fair housing laws and expand housing opportunities for people with disabilities.

Drawing on more than five years of experience supporting the City of Los Angeles' Accessible Housing Program, Abt Global has identified practical insights into what helps accessible housing programs succeed. These observations are based on hundreds of compliance reviews, site visits, and interviews with property owners, managers, and residents with disabilities. While every jurisdiction's program will differ, the implementation lessons described below may be useful for cities, housing providers, and advocates seeking to strengthen accessibility in affordable housing.

Background

In 2020, the City of Los Angeles retained Abt Global to serve as the external auditor for its Accessible Housing Program (AChP). The AChP was established as part of a settlement agreement to increase accessibility in publicly funded affordable housing.¹ The program covers more than 750 affordable housing developments throughout Los Angeles. Each covered housing development must follow the program requirements and submit quarterly reports that acknowledge their adoption of the AChP policies and provide information on how they are complying with them—including how they are managing wait lists, filling any accessible units, and handling any accessibility-related requests. The City has a team of managers and analysts who monitor properties' compliance and handle any grievances filed by tenants or applicants with disabilities. The parties to the



settlement agreement also remain involved in program oversight, with the City, Plaintiffs' counsel, and a Court Monitor participating in regular meetings of the Monitoring, Compliance, and Enforcement (MCE) Plan working group. Abt's work is thus framed within this larger effort to implement and monitor the City's AChP.

As part of its role, Abt conducts independent compliance reviews that include remote desk reviews of submitted documents and reports followed by site visits and interviews with owners, property management staff, and residents with disabilities and accessibility needs. To date, Abt has reviewed more than 280 housing developments, interviewed more than 300 owners and property managers, and spoken with more than 250 residents.

Five Years of Compliance Monitoring

- 280+ developments reviewed out of 750+ housing developments under AChP
- 300+ owner and property manager interviews
- 250+ resident interviews
- 50+ site visits completed

Through this work, Abt has observed how accessibility policies are implemented in property operations, where common challenges emerge, and which program practices appear most effective at supporting compliance and improving

housing access for people with disabilities. The insights presented in this paper reflect those observations, and they represent the opinions of Abt staff only and do not attempt to speak for the parties to the settlement agreement.

Earlier this year, the City of Chicago reached a settlement agreement with Access Living that will require the establishment of a program similar to the one in Los Angeles. The plaintiff's counsel noted that *"the outcomes of... two of the largest accessible affordable housing settlements in the nation's history... incentivize other large cities to take stock of their own accessibility compliance."*² Cities that do not invest now to voluntarily enforce compliance with fair housing laws may be forced to pay more later.³ The observations below are intended to inform efforts to implement accessibility programs in jurisdictions across the country.

Key Insights from Five Years of Monitoring Los Angeles' Accessible Housing Program

Based on five years of monitoring affordable housing developments' participation in the City of Los Angeles' AcHP, Abt has identified several factors that appear critical to promoting compliance with fair and accessible housing requirements. While every jurisdiction's approach will differ, these insights may be useful for public officials, advocates, and program administrators responsible for implementing and overseeing accessible housing programs.

1. Clear Program Expectations and Consistency are Key for Program Effectiveness

What we've learned

Programs are most effective when requirements are clearly defined early and remain consistent.

Why it matters

Accessible housing programs often cover properties that differ significantly in age, funding sources, physical accessibility, and operational

capacity. When requirements change or are not all applicable to every type of property, confusion can emerge among property owners and managers, making compliance more difficult.

What it looks like in practice

In Los Angeles, City staff and program stakeholders have spent considerable time revisiting how certain requirements should apply to different types of housing projects, such as older versus newer properties, projects with certified accessible units versus those with units designated as accessible but never formally certified, and projects without any accessible units. As programs mature, questions inevitably arise about whether all requirements make sense for all properties. Clear expectations early on can reduce confusion, improve credibility, and avoid the need to revisit major policy decisions later.

2. Training Builds Awareness, but Ongoing Support Drives Compliance

What we've learned

Training is a necessary foundation for compliance, but it is rarely sufficient on its own.

Why it matters

Property management staff experience turnover, manage multiple compliance obligations, and often encounter accessibility situations that require judgment and problem-solving. As a result, questions arise even among staff who have completed required training. Programs seem to work best when annual training is paired with ongoing technical assistance, practical guidance, and opportunities to ask questions.

What it looks like in practice

During our reviews, property staff generally provided positive feedback on the AcHP's regular training opportunities. However, they also reported needing more guidance on various topics, such as assistance animals, determining what accommodations are "reasonable" (particularly more costly requests), the management and reporting of waitlists, and how to apply accessibility requirements in unusual situations.

Property staff need somewhere to go when real-world questions come up—be it a City hotline or their assigned City analyst.

3. Relationship Building Ensures Effective Implementation

What we've learned

Compliance improves when property owners and managers view the program as a source of support rather than solely as an added reporting requirement.

Why it matters

Property managers are often balancing staffing shortages, resident needs, regulatory requirements, and multiple reporting systems. Accessibility requirements often involve complex situations that benefit from discussion, technical assistance, and collaborative problem-solving.

What it looks like in practice

Across our compliance monitoring, many implementation challenges were linked to turnover, capacity constraints, competing priorities, or uncertainty about requirements rather than resistance to accessibility goals. Property staff frequently cited responsive relationships with City staff as one of the most valuable aspects of the program because they helped mitigate property challenges. Managers often described relying on their assigned ACHP analyst for guidance on reporting, waitlists, accommodation requests, and other implementation questions. Having a designated point of contact who can answer questions and provide guidance helps build trust and encourages timely resolution of issues before they become compliance concerns.

4. Accessible Units Require Active Management to Reach the People Who Need Them

What we've learned

Creating or identifying accessible units is only one part of the challenge. Ensuring those units are occupied by households that need their unit's

Difficulty Matching Applicants to Vacant Accessible Units

Matching applicants to accessible units can be complex. Some accessible units are located in properties that serve specific populations or have additional eligibility requirements related to age, income, veteran status, disability type or medical condition, supportive housing programs, or referral systems. We repeatedly heard from property managers that finding someone who both qualifies for the property and needs the unit's accessibility features can be challenging, even when—and often *because*—the demand for affordable housing is high.

A citywide Accessible Housing Registry can facilitate searches for accessible housing and applications to property waitlists. It has proven difficult to implement initial eligibility checks of applicants within these registries, which leads to high volumes of ineligible applicants joining affordable housing waitlists. This issue has created burdens and inefficiencies in Los Angeles and other places.⁴

Centralized registries need to make it clear to applicants that they will only be placed in an accessible unit if they need the features of that unit. The registry should also clearly define mobility and hearing/vision unit features so that applicants know which kind of unit they need and can apply accordingly.

specific accessibility features requires ongoing attention and coordination.

Why it matters

Creating new accessible units can be expensive, time-consuming, and, in many cases, difficult to achieve within an existing housing portfolio. Given the scarcity and high demand for accessible units, it is critical to ensure that any vacant accessible units are properly occupied. When an accessible

unit remains vacant or is occupied by someone who does not need its accessibility features, an opportunity to meet the housing needs of a person with a disability may be lost.

What it looks like in practice

Our experience suggests that vacancies in accessible units represent one of the best opportunities to improve access to accessible housing. Once residents move into an affordable housing development, turnover is often limited. Timely notification and coordination between property and City staff on vacancies will help ensure accessible units are occupied by people who benefit from their features.

By contrast, efforts to relocate existing occupants who do not need the accessibility features of their unit can be difficult to implement in practice. Property managers often face challenges identifying comparable replacement units, and residents are frequently reluctant to move. As a result, these relocations occur infrequently.

5. Reporting Works Best When It Serves a Clear Purpose

What we've learned

The most effective reporting requirements focus on information that can be used to improve outcomes for residents with disabilities or other accessibility needs.

Why it matters

Property staff often participate in multiple housing programs and compliance systems simultaneously. Reporting requirements that are difficult to meet or that do not clearly inform decision-making can create administrative burden without generating meaningful program improvements.

What it looks like in practice

Our reviews have shown that property managers spend significant time screening applicants, maintaining waitlists, and navigating reporting systems. Many managers participate in multiple compliance programs simultaneously and described spending considerable time updating

reports and entering similar information across different systems. Reporting was viewed more positively when staff understood why information was being collected and how it would help improve housing outcomes for people with disabilities. User-friendly systems and reporting requirements that serve a clear purpose are more likely to get buy-in from property staff.

6. Clear Communication Is Critical for Both Property Staff and Residents

What we've learned

Residents cannot exercise rights they do not understand, and property staff cannot consistently implement requirements they find difficult to interpret.

Why it matters

Even well-designed policies can encounter challenges if property staff, applicants, or residents find accessibility program policies and procedures difficult to understand or use.

What it looks like in practice

Many residents learn about fair housing rights and available accommodations through conversations with property staff, community organizations, advocates, and peers rather than through written materials alone. Interviews with residents suggest that while many have a general awareness of their rights to accessible housing, fewer understand the specific processes for requesting reasonable modifications or accommodations or resolving concerns. Residents frequently cited case managers, healthcare providers, advocacy organizations, and neighbors as important sources of information and support. Written materials matter—and should use plain language—but they are rarely enough on their own. Programs are more successful when information is reinforced through ongoing outreach and opportunities for residents and staff to ask questions.

7. Residents Need Safe and Trusted Ways to Advocate for Their Needs

What we've learned

Many residents with accessibility needs do not request accommodations or raise concerns, even when their needs go unmet.

Why it matters

Accessible housing programs may assume that residents will advocate for themselves when barriers arise. In practice, that is not always the case. Some residents do not know their rights. Others are reluctant to make requests because they worry about being viewed as difficult, damaging their relationship with property staff, or jeopardizing their housing stability. Creating confidential opportunities for residents to share concerns can help surface issues that may not be visible through records, reports, or formal grievance processes.

What it looks like in practice

During our interviews, residents frequently described unmet accessibility needs that they had never formally reported. Some expressed concern that requests would be denied or ignored or would lead to conflict with management. Others described previous experiences where they felt their concerns were not addressed, making them less likely to raise future issues. Several residents explicitly stated that they did not want to "*cause problems*" or "*step on toes*," particularly in a housing market where affordable housing options are limited. These findings suggest that resident education alone is not enough. Programs are most effective when residents have trusted and accessible channels to ask questions, raise concerns, and seek assistance without fear of negative consequences.

8. Looking Beyond Paper Compliance Provides a More Complete Picture

What we've learned

Adopted policies, self-reported information, and administrative records provide important insights into program implementation, but they do not

always capture residents' experiences or how policies are functioning in practice. Some of the most important findings only emerge when you visit properties and talk directly with residents and staff.

Why it matters

Accessible housing programs ultimately exist to ensure that people with disabilities can access, use, and fully enjoy their housing. Understanding whether that goal is being achieved requires more than reviewing submitted documentation and reports. Program administrators need visibility into how policies are interpreted, implemented, and experienced on the ground.

What it looks like in practice

Site visits and conversations with residents and property staff frequently reveal information that cannot be identified through document review alone. Residents often describe accessibility challenges, unmet accommodation needs, elevator outages, communication barriers, or concerns about requesting assistance that are not reflected in administrative records. These conversations provide important context for understanding how housing programs affect residents' day-to-day lives.

Site visits also reveal things that are easy to miss in remote reviews. Across our reviews, in-person visits identified missing or outdated postings, policies that had been updated on-site but not uploaded to reporting systems, inconsistencies in how reasonable accommodation requests and waitlists were maintained, and questions about how accessible units were classified, occupied, or managed. In some cases, site visits identified new issues; in others, they resolved apparent compliance concerns when property staff provided additional documentation or context unavailable during the initial review.

Our experience suggests that document reviews, interviews, and site visits each provide a different perspective on program implementation. When used together, they offer a more complete understanding of both compliance and resident outcomes than any single method.

9. Independent Reviews Can Strengthen Program Performance Over Time

What we've learned

Compliance reviews do more than measure whether requirements are being followed. They also help properties better understand program expectations and identify areas for improvement.

Why it matters

Monitoring programs helps identify trends, clarify expectations, and provide opportunities for corrective action and learning.

What it looks like in practice

In Los Angeles, properties previously reviewed by Abt generally had fewer and less severe issues when reviewed again several years later. The review process allows staff to ask questions, clarify requirements, and discuss real-world implementation challenges. In that sense, reviews

serve both an accountability function and an educational one.

The benefits appear to extend beyond identifying individual compliance issues. Site visits and interviews often become opportunities for collaborative problem-solving, allowing program administrators and housing providers to develop a shared understanding of how policies should be implemented in real-world settings.

Our experience also suggests that recurring reviews can help identify broader trends across a housing portfolio. By examining findings over time, program administrators can distinguish between isolated property-level issues and system-wide challenges that may require changes to training, guidance, reporting requirements, or program design. In this way, monitoring serves both an accountability function and a learning function, helping programs improve not only compliance but also outcomes for residents with disabilities.

Contact Info for Further Information

For more information or details on these findings and Abt's role in the City of Los Angeles' Accessible Housing Program, please contact Eric Friedman (eric.friedman@abtglobal.com) or Soledad De Gregorio (Soledad.DeGregorio@abtglobal.com).

References

¹ The ACHP was created as part of the Settlement Agreement in the 2016 case *Independent Living Center of Southern California, et al v. the City of Los Angeles*.

² Relman Colfax PLLC, "Access Living of Metropolitan Chicago v. City of Chicago," accessed July 23, 2026, <https://www.relmanlaw.com/cases-access-living-chicago-il-fair-housing>

³ Shelterforce. "Courts to City Housing Depts: Pay for Accessibility Up Front or Pay More Later." *Shelterforce*, 6 Aug. 2026, <https://shelterforce.org/2026/08/06/courts-to-city-housing-depts-pay-for-accessibility-up-front-or-pay-more-later/>

⁴ Massachusetts experienced similar issues with floods of ineligible applicants applying for public housing via a centralized system as described in this article: <https://www.propublica.org/article/massachusetts-public-housing-units-vacant-despite-waitlists>.