

**Report on the Response of the  
Virginia Housing Development Authority  
to the Impact of the Aging  
of Virginia's Population**

November 13, 2014



Pursuant to Code of Virginia §§ 2.2-5510 and 51.5-136, the Virginia Housing Development Authority submits this report of its progress in addressing the impact of the aging of Virginia's population.

The designated agency official responsible for reviewing policy and programs and accommodating the interests of older adults and adults with disabilities under Code of Virginia § 2.2-604.1:

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1. If your agency has undertaken any actions to respond to the current and future impact of an aging population, such as needs assessments, strategic planning, or use of best practices, please briefly describe those actions. Please indicate what assistance from DARS could help your agency as it prepares to serve an aging Virginia population.

A decade ago, VHDA made the housing needs of low-income seniors one of its core strategic priorities, and created a position in VHDA's Outreach Division focused on liaison with senior housing stakeholders and assistance to VHDA's program staff in better serving senior needs. However, the severity and breadth of the subsequent housing recession significantly altered near-term housing demand and, consequently, VHDA's short-term strategic focus. In regards to senior needs, these market changes impacted VHDA's rental housing programs by significantly weakening senior demand. Many occupants of new senior housing developments are previous homeowners who have reached an age and health status where maintaining a house has become physically and/or financially burdensome. For these seniors, moving into a senior rental housing development is dependent on the sale of their home at a sufficient price to provide a pool of income to cover future rent payments. Depressed home prices and difficult local housing market conditions have caused many seniors to postpone a move to senior housing. Consequently, development of new senior rental housing has lagged other affordable housing investments since 2008.

Now that the housing market is returning to more normal conditions, VHDA has initiated an updated assessment of housing needs and a new multi-year strategic planning effort. In 2013, VHDA prepared regional forecasts of housing demand by age and tenure as part of the initial phase of an updated housing needs analysis. Those forecasts and related analyses documented a number of significant impacts that an aging population will have on VHDA programs and the challenges they will entail. These include:

- The rapid aging of Virginia's rural areas as well as the urban areas in the southern and western regions of the state. This is causing slow or negative population growth and an overall weakness in housing demand. In declining rural regions, there is limited demand by younger homebuyers for the homes being vacated by aging adults, especially seniors of low and moderate income. This is resulting in high single-family home vacancy rates in many rural areas—especially on the Eastern Shore and in Southside—and is making needed residential transitions difficult for seniors and their families.
- The homeownership rate among seniors is the highest of any age group and continues to rise due to a strong preference to age in place. Consequently, much of the demand for new senior apartments is need-based and limited to households age 75 and older. While rental demand among older seniors is growing, the anticipated sharp increase in demand will not come until after 2020 when the oldest of the Baby Boomers reach age 75.
- Among long-term renters, seniors are mainly aging in place in their current rental residences, which were not specifically designed for older adults. Over time, this will lead to a growing number of “naturally occurring retirement communities” (NORCs), which will need to adapt to the needs of their aging residents.

- There is a substantial mismatch between the current location of senior rental housing developments and future demand, especially for rental units affordable to those with very low income. The current affordable senior apartment inventory, and especially units with rent subsidy assistance, is disproportionately located in central cities and rural areas where seniors were previously concentrated. Now, rural areas are undergoing population decline and central city populations are becoming younger as seniors die and their single-family homes turn over to younger homebuyers. In contrast, growing suburban localities are aging rapidly, but they lack a legacy inventory of senior housing and the new senior developments being built lack deep project-based rental subsidies, which are no longer available to new properties through federal housing assistance programs.

In 2015, VHDA will carry out intensive regional engagement sessions with stakeholders of its rental, outreach and homeownership programs to inform the development of a new multi-year strategic plan. The purpose of the engagement sessions will be to determine what is working well, what is not working/needs fixing, and what changes in VHDA programs, services and priorities will better serve VHDA's constituents. Input on senior housing needs will be solicited as part of these sessions and will be incorporated into VHDA's new strategic plan.

2. Briefly describe your agency's services that are used primarily by older Virginians and the funding streams (types and amounts) that support those services. If these particular services or funding streams are provided in conjunction with other state or local agencies or other for profit or non-profit organizations, please list them.

**Mortgage loans for the development of senior rental housing:** VHDA provides mortgage loans for the development or acquisition and rehabilitation of affordable rental housing specifically designed for and restricted to occupancy by low- and moderate-income seniors. Such housing may include independent-living apartments, as well as congregate care facilities and assisted living facilities. Mortgage loans are provided to both for-profit and nonprofit developers, and are funded through the sale of taxable bonds, tax-exempt AMT bonds, and REACH subsidies funded with net assets of VHDA. Senior housing funded with tax-exempt AMT bonds are eligible under federal regulations to receive 4% Low-Income Housing Tax Credits, which provide a development subsidy that enable rents to be affordable to households with income of 60% or less of the area median income.

VHDA mortgage financing serves two purposes. First, it increases the supply of affordable senior housing. Second, it preserves the physical and financial viability of the existing inventory of affordable senior housing including the retention of any federal rent subsidies assigned to those properties. In FYs 10-14, VHDA provided \$59,852,514 in mortgage loans to develop or preserve 22 senior housing developments containing 1,536 affordable rental units.

**Allocation of federal 9% Low Income Housing Tax Credits (LIHTCs):** VHDA administers the allocation of Virginia's annual allotment of federal 9% LIHTCs to support the development and preservation of affordable rental housing. Whereas 4% LIHTCs are automatically made available to developments financed with tax-exempt AMT bonds, higher 9% LIHTCs are competitively allocated to developers of affordable rental housing in accordance with an annual Qualified Allocation Plan (QAP) adopted by VHDA pursuant to federal regulations. Rental

housing developments designed for occupancy by low-income seniors are eligible to compete for 9% LIHTCs. VHDA provides significant incentives in the competitive allocation process for units designed to meet the needs of an aging population, especially those with very low incomes. Significant competitive scoring points are awarded for providing additional units beyond those minimally required that meet federal Section 504 accessibility standards. Significant scoring points are also awarded to developments incorporating Universal Design principles. In 2010-14, VHDA allocated \$13,768,801 in LIHTCs to 47 senior housing developments containing 2,212 affordable rental units.

**Administration of federal Housing Choice Vouchers (HCVs):** VHDA serves as the contract administrator for the federal HCV rent subsidy program in 75 mainly rural and suburban localities that lack the ability and/or willingness to independently administer the program with HUD. In other areas, HCVs are administered by local public housing agencies. Currently, VHDA administers approximately 20 percent of total federal HCV rent subsidy units in Virginia.

The HCV program serves extremely low-income households (75% of funds must be targeted to households with income of 30% or less of area median income) who are provided with a monthly subsidy that covers the difference between the amount of rent that they can afford and a federally set rent standard. Households are able to use the subsidy in any available rental unit where the rent is within federal guidelines and the landlord is willing to participate in the HCV program. VHDA administers HCVs in partnership with 32 local agents (primarily local government offices and nonprofit organizations), which exercise discretion as to whether to provide a waiting list preference for seniors. Currently, 13 of the 32 local agents have a waiting list preference for seniors. At the end of FY14, 1,987 (23%) of VHDA's HCV recipients were seniors.

**Administration of federal project-based rent subsidies:** VHDA administers federal rent subsidies for 5,860 senior residents of rental housing financed under HUD's Section 8 program—both senior-only housing developments (2,941 units) as well as housing designed for general occupancy whose occupants have aged in place (2,919 units). Those subsidies make up the difference between the full market rent for the apartment and the amount the tenant can afford based on 30% of their gross income. These project-based rental subsidies are funded through federal contracts that, initially, were co-terminus with a VHDA mortgage on the property. These residential properties were all developed during the late 1970s and early 1980s under federal subsidy programs that are no longer active. Therefore, while existing subsidy contracts continue to be maintained, new rent-subsidized units of this type are no longer being produced.

**Mortgage loans for home purchase:** VHDA provides mortgage loans for home purchase by low and moderate income borrowers. Such loans are mainly used by first-time home buyers whom federal regulations define as someone who has not owned a home in the prior three years. The large majority of home purchase loans are made to young buyers (average borrower age is 34). Nonetheless, the aggregate number of VHDA home purchase loans to seniors is significant. These loans are made to seniors who either meet the first-time buyer definition or who live in areas of economic distress where the first-time homebuyer restriction is waived. Many of VHDA's senior home purchase borrowers represent hardship situations—e.g., financing for replacement housing when the current home is substandard. In FYs 10-14, VHDA made \$96,087,192 in mortgage loans to support home purchase by 602 senior households.

**Funding for Housing Counseling:** VHDA administers federal funds received through competitive application under the HUD Housing Counseling Grant program and National Foreclosure Mitigation Counseling Grant (NFMC) program. VHDA supplements these federal funds with VHDA REACH subsidies which are funded through an allocation of VHDA’s net revenues. VHDA allocates all of these funds to local HUD-approved housing counseling agencies to support a variety of direct homeowner and rental counseling services including reverse mortgage counseling for seniors. VHDA administers a portion of the federal grant funds allocated to Virginia; there are other intermediaries that also allocate funds to counseling agencies throughout the state. The table below shows the amount of housing counseling funds administered by VHDA since FY 2010.

<b><u>Funding</u></b>	<b><u>FY 10</u></b>	<b><u>FY 11</u></b>	<b><u>FY 12</u></b>	<b><u>FY 13</u></b>	<b><u>FY 14</u></b>	<b><u>Total</u></b>
REACH	\$500,000	\$450,000	\$1,150,000	\$950,000	\$1,742,563	\$4,792,563
HUD	\$225,125	\$250,500	\$240,400	\$758,677	\$834,333	\$2,309,035
NFMC	\$191,643	\$237,363	\$260,985	\$200,978	\$181,166	\$1,072,135
<b>Total</b>	<b>\$916,768</b>	<b>\$937,863</b>	<b>\$1,651,385</b>	<b>\$1,909,655</b>	<b>\$2,758,062</b>	<b>\$8,173,733</b>

3. Identify current agency programs specifically designed to serve older Virginians that fall into any of the following eight categories:

- Health Care/Wellness  
N/A

- Education

**Funding of HECM Counseling:** VHDA’s provision of housing counseling funds to local HUD-approved counseling agencies supports Home Equity Conversion Mortgage (HECM) counseling, which is required by HUD as a pre-requisite for a senior who wishes to obtain a federally insured reverse mortgage loan. HECM loans provide seniors with a source of funds to meet an array of household financial obligations with no repayment required so long as the senior continues to use the home as their principal residence.

- Public Safety (including Adult Abuse Prevention)  
N/A

- Recreation  
N/A

- Housing

**Funding for the development of senior rental housing:** VHDA provides mortgage financing and allocates federal Low Income Housing Tax Credits for the development

of affordable rental housing specifically designed for and restricted to occupancy by low- and moderate-income seniors. Such housing may include independent-living apartments, as well as congregate care facilities and assisted living facilities. Funding is provided to both for-profit and nonprofit developers.

Senior housing developments funded through VHDA's SPARC program, which provides internally generated REACH capital subsidies, must serve "frail" seniors. These developments are required to provide geriatric case manager/service coordinator assistance either directly or through linkages with community-based service providers so that supportive services are available, as needed, to residents.

- Accessibility (including Livable Communities <http://www.vadrs.org/vblc/>)

**Accessibility/Universal Design in senior rental housing:** Through program incentives and training, VHDA actively promotes high levels of Section 504 accessibility compliance and the use of Universal Design in the senior housing it funds.

- Financial Security

(See **Funding for HECM Counseling** under Education above.)

- Transportation

N/A

4. Is your agency able to meet all of the service demands of older Virginians for the services listed above? If there are any instances where the demand for services exceeds your agency's ability to meet the demand, please indicate the service and the extent of the unmet demand. Also, if your agency maintains waiting lists for services, please provide this information, including the waiting list numbers for each service.

**Mortgage loans for the development of senior rental housing:** Several factors impact VHDA's ability to meet demand for rental housing affordable to low- and moderate-income seniors.

- First, is access to cost-effective mortgage capital to fund mortgage loan programs. Many of the senior housing developments VHDA finances rely on reduced interest rate financing provided with tax-exempt bonds. The issuance of those bonds is regulated by the federal government through the IRS Code, which governs the annual amount of bonds that each state can issue, the terms and conditions of those bonds, and the permitted uses of bond proceeds. Presently, VHDA has adequate annual tax-exempt bond issuance authority to fully meet demand for mortgage loans. However, changes in federal tax law could alter this situation at any time including: 1) any curtailment in state volume caps on bond issuance; and 2) federal tax reform. In addition, since the financial market crisis in 2008, the federal government has dominated the mortgage capital markets in a manner that has made it very difficult for state housing finance agencies, including VHDA, to issue tax-exempt housing bonds on a cost-effective basis. Until the national mortgage

capital markets recover, VHDA continues to explore and make use of alternative capital strategies and opportunities in order to meet the needs of affordable rental developments.

- Second, is local land use and zoning restrictions, which impact whether developers of affordable senior rental housing are able to secure building sites and necessary local government approval. While VHDA has sufficient loan capital to meet current demand for mortgage loans by developers, future increases in loan demand resulting from an increased ability of developers to bring multifamily projects forward to the financing stage, will require greater access to capital.
- Finally, although, VHDA mortgage loans may be used to finance congregate and assisted living facilities serving low- and moderate-income seniors, the cost of providing supportive services and the lack of adequate subsidy programs in Virginia to write down the cost of those services, make it extremely difficult to structure economically viable affordable congregate or assisted living facilities. Facilities serving low-income seniors are mainly dependent on capital grants rather than debt financing provided by VHDA or through other government loan programs. [See 2000 House Document No. 44: "Study of Financing for Affordable Assisted Living Options Pursuant to HJR 749"]

**Allocation of federal 9% Low Income Housing Tax Credits (LIHTCs):** Most senior housing developments that use sources of financing other than tax-exempt bonds also depend on 9% federal LIHTC subsidies for feasibility. Demand for 9% LIHTCs by developers exceeds the available supply. Therefore, credits are allocated on a competitive basis. Currently, the most underserved need within the LIHTC program is for affordable rental units serving non-elderly, low-income families due to the greater difficulty in gaining site approvals for low-income family housing. Therefore, VHDA has capped the share of credits that are available for allocation to senior developments. The continuing need for such a cap will be reevaluated each year in the redrafting of the Qualified Allocation Plan (QAP). In 2014, 73 percent of the senior developments requesting tax credits were approved. In contrast, 75 percent of other types of rental housing request tax credits were approved.

**Administration of federal Housing Choice Vouchers (HCVs):** Demand for rent subsidy assistance through the federal Voucher program greatly exceeds supply. Currently, on a statewide basis, only one in four income-eligible renter households is able to obtain voucher assistance. Consequently, wait lists are extremely long. VHDA's current local waiting lists have 15,355 applicants of whom 889 (6%) are seniors. Of the 889 seniors on VHDA local wait lists, 441 are age 60-64, 341 are age 65-74, 88 are age 75-84 and 19 are age 85+. However, wait list numbers understate unmet need, since wait lists remain closed except for infrequent brief openings. For example, VHDA's HCV program in Manassas opened its wait list on one day in October 2014. Over 4,000 names were added to the waiting during the three hours it was open for the 18 anticipated vouchers expected to become available in the coming fiscal year. The shortage of federal rent subsidies relative to demand is expected to become even worse in coming years as Congress attempts to control the rising costs of this program in the face of shrinking HUD budget resources.

**Administration of federal project-based Section 8 rent subsidies:** The federal project-based rent subsidy contracts administered by VHDA are co-terminus with the 30-year or 40-year term

of the VHDA mortgage loan on the rental development to which the rent subsidies are assigned. All of these senior housing properties were developed during the middle 1970s and early 1980s. Therefore, their contracts have reached or are nearing expiration. Upon the expiration of the original long-term contracts, the federal government has been providing ongoing rental assistance to tenants pursuant to new year-to-year contracts administered by an independent HUD contractor. These annual contracts are intended to avoid tenant displacement. However, there is no guarantee that federal funding will continue in future years.

5. Provide the number of persons, by gender if available, who received services from the agency in each of the past five state fiscal years (FY 2010 through FY2014) who fell into the following age ranges: 60-64; 65-74; 75-84; and 85 and older. If your agency lacks specific information about the numbers of older Virginians it serves but has other evidence indicating that it is serving more or fewer older Virginians than it has in the past, please describe the basis for that estimation.

**Number of seniors residing in VHDA-funded rental developments** (i.e., developments receiving mortgage loans, federal Low Income Housing Tax Credit assistance and/or have rent subsidy contracts administered by VHDA):

Age 60-64: 6,691 of whom 3,119 (46.6%) receive federal rent subsidy assistance

Age 65-74: 11,144 of whom 5,614 (50.4%) receive federal rent subsidy assistance

Age 75-84: 7,397 of whom 4,068 (55.0%) receive federal rent subsidy assistance

Age 85+: 3,199 of whom 1,563 (48.9%) receive federal rent subsidy assistance

Total Age 60+: 28,431 of whom 14,364 (50.5%) receive federal rent subsidy assistance

These numbers are as of the end of FY14. They are not available for prior fiscal years. However, they have grown and will continue to grow as VHDA's portfolio of senior housing developments increases (see production numbers below) and as the tenant population in other VHDA funded rental developments continues to age in place.

**Number of senior rental housing developments/units funded:**

FY 2010: 4 developments / 163 units

FY 2011: 5 developments / 202 units

FY 2012: 6 developments / 339 units

FY 2013: 6 developments / 627 units

FY 2014: 1 development / 205 units

**Number of senior Housing Choice Voucher recipients:**

	<u>FY10</u>	<u>FY11</u>	<u>FY12</u>	<u>FY13</u>	<u>FY14</u>
Total HCV Recipients:	8,808	9,080	8,984	9,092	8,901
Total Age 60+:	2,339	2,302	2,230	2,104	1,987
Share of Total Recipients:	27%	25%	25%	23%	23%
Share Female:	82%	82%	81%	81%	81%
Age 60-64:	709	711	715	687	670
Age 65-74:	944	950	939	895	836
Age 75-84:	486	471	431	397	380
Age 85+:	200	170	145	125	101

**Number of senior home purchase loan recipients:**

	<u>FY10</u>	<u>FY11</u>	<u>FY12</u>	<u>FY13</u>	<u>FY14</u>
Age 60-64:	91	76	57	62	49
Age 65-74:	67	40	47	40	36
Age 75-84:	15	4	5	5	3
Age 85+:	3	0	2	0	0
Total Age 60+	176	120	111	107	88

**Number of seniors receiving housing counseling assistance:**

Data on persons served through federal housing counseling grants is reported by counseling agencies to NeighborWorks and HUD, which do not track the age/date of birth of housing counseling recipients. However, some HUD-approved housing counseling agencies provide services that exclusively serve seniors—i.e., HECM/Reverse Mortgage counseling to individuals age 62 and older. In order to provide a state perspective, VHDA requested NeighborWorks and HUD's Office of Housing Counseling to provide state level data on recipients of HECM/Reverse Mortgage counseling. The data below reflects individuals receiving this service by federal fiscal year (October to September).

Federal FY 2010: 3,419

Federal FY 2011: 946

Federal FY 2012: 834

Federal FY 2013: 673

Federal FY 2014: 308

Note: The sharp fall-off after 2010 reflects the impact of the drop in home values during the early stages of the housing downturn that significantly reduced the ability of seniors to benefit from reverse mortgages.

6. Referring to the services or funding you described in item two, describe any services or funding provided to older Virginians for which the accessibility or availability varies considerably in different parts of the Commonwealth.

**Administration of federal Housing Choice Vouchers (HCVs):** Local HCV programs have been established and expanded incrementally over time since the program's inception in the mid-1970s. Programs in different localities started up at different times depending on local interest in establishing a program and the availability of new incremental federal funding. Consequently, current HCV funding is not evenly distributed geographically relative to need. Incremental increases in federal funding have not kept pace with the increase in needy households. Therefore, localities that have entered the program the most recently, and those experiencing the highest rates of population growth, generally have lower accessibility to HCV subsidies than other areas. Currently, localities served by VHDA in the northern part of Virginia (i.e., the northern Shenandoah Valley, North Piedmont, Manassas, and Fredericksburg area), which have been experiencing both the most rapid population growth and the greatest rise in housing costs relative to incomes, have the largest shortage of HCV rent subsidies relative to need.

7. Over the next five to 10 years, in what ways do you anticipate that an aging population will impact your agency's services, funding streams, or policies? Consider the impact from an increase in the number of older Virginians and whether the needs of older Virginians will differ from those of today's older adults. Please include any anticipated impacts upon the cost of services, changes in type of services or the manner of service delivery, or modifications to agency policies, staffing needs, or procedures.

VHDA currently has financing programs in place to meet the need for affordable senior rental housing providing independent living accommodations. As demand for senior housing increases relative to demand for affordable rental housing serving non-elderly populations, then VHDA anticipates incrementally reallocating loan capital and related subsidies (i.e., federal LIHTCs) to senior housing developments.

The most serious challenge going forward will be the provision of rent subsidies to very low income seniors who cannot otherwise afford quality rental housing. Rent subsidy assistance is dependent on federal funding, which has failed to keep pace with rising housing costs and need. On average, only one in four Virginians who is eligible for rent subsidy assistance is able to receive it. Consequently, rental households with severe housing cost burdens (i.e., rent greater than 50 percent of income) continue to increase at a steady rate. As the number of seniors on fixed incomes grows in coming years, along with the movement out of institutions and into community settings of other needy populations—e.g., non-elderly people with disabilities—the number of seniors with severe housing cost burdens is expected to grow.

Federal rent subsidy assistance is already prioritized to the neediest households—i.e., those with extremely low income (less than 30 percent of area median)—who make up 72 percent of current

subsidy recipients. These households include seniors, non-elderly people with disabilities, homeless populations, and families with children. Consequently, program preferences for the neediest populations are ceasing to be effective means for avoiding hardship. For example, currently, senior participation in the Housing Choice Voucher program is being negatively impacted by the rapid expansion of need and demand among non-elderly high-priority extremely low-income populations—especially non-elderly people with disabilities. While seniors represented 23 percent of voucher recipients in VHDA's HCV program in FY14, they represented just 6 percent of people on local wait lists. This explains the sharp drop in senior HCV participants between 2010 and 2014, especially among those age 85+ whose numbers dropped by half (see data in response to question 5). As older seniors die or leave the program due to a need for institutional care, they are being replaced by non-senior households who now make up 94 percent of local waiting lists.

Another serious challenge will be the provision of affordable assisted living. For the reasons cited in the response to question 4, VHDA will continue to be challenged in addressing the need for affordable assisted living facilities. New program models will be needed in order to bring sufficient service subsidies and housing subsidies together to achieve project feasibility. Development of these models will require new state resources and significant inter-agency time and effort.

The homeownership rate for seniors continues to rise. By and large, the mortgage needs of seniors are being met by private lenders through home equity loans or reverse mortgages. Senior homeowners who are unable to use private lending resources to address their needs mainly require grant assistance for home modifications or repairs, and are being assisted through federal programs (e.g., HOME and CDBG block grants) administered either locally or by DHCD. VHDA is actively promoting the use of Universal Design and the provision of accessible units in new residential construction in order to reduce future demand for subsidies to pay for costly home retro-fits.

8. Please describe the primary steps that should be taken at the federal, state, or local levels to meet the future demands of older Virginians and to make services delivery more effective and efficient.

First, there need to be organizational structures at all levels of government that facilitate, provide incentives for, and support coordination between human service agencies/ providers, and housing agencies/providers. Where such structures exist—e.g., in Fairfax and Arlington Counties where local housing agencies and Area Agencies on Aging are both part of county government; and in the Northern Neck-Middle Peninsula and Richmond areas where the Area Agencies on Aging have nonprofit affiliate housing development organizations—innovative models for providing housing in coordination with residential services are occurring. In areas where structures for bringing aging services and housing organizations together are lacking, the track record is spotty.

Second, federal and state governments must maintain adequate funding for the housing and residential service subsidies upon which low-income seniors depend, including:

- continued federal support in the IRS Code for the issuance of private activity housing bonds and Low-Income Housing Tax Credits;
- federal funding for Housing Choice Vouchers, and rent subsidies to replace expiring Section 8 and Rural Housing Services project-based subsidy contracts;
- federal funding of development subsidies such as the HOME program;
- federal and state funding for service coordination and senior residential services provided through Area Agencies on Aging and other senior service providers; and
- development by federal and state governments of new, cost-effective, and workable service subsidies to support the development of quality affordable assisted living facilities affordable to low- and moderate-income seniors.

9. Identify the extent to which your agency provides “customer-oriented” publications and websites that are designed to be “senior-friendly.” If the information you currently provide is not readily accessible to older Virginians, please identify any steps your agency is taking to improve their access to this information.

VHDA’s website, [vhda.com](http://vhda.com), is designed to conform to the WAI Level A accessibility criteria. That criteria includes, but is not limited to, the following.

- All images, form image buttons, and image map hot spots have appropriate, equivalent alternative text. Alternative text provides a textual alternative to non-text content in web pages.
- All functionality is available from a keyboard and any shortcut keys do not conflict with existing browser and screen reader shortcuts.
- Content is not designed in a way that is known to cause seizures.
- The site is navigable; there are ways for users to find content and determine where they are on the site.
- Web pages appear and operate in predictable ways.
- The content can be used reliably by a wide variety of assistive technologies.

VHDA’s printed publications are designed to be user friendly, easy to read and understand, regardless of age.

10. Describe any other services or programs that your agency plans to implement in the future to address the impact of the aging of Virginia’s population.

In 2015, VHDA will review senior program and service needs as part of the strategic planning efforts described in the response to question 1, and will make program and service changes as appropriate as part of the implementation of strategies developed through that process.

11. Please indicate if your agency is experiencing an increase in employees retiring later and describe any actions your agency is taking or plans to take to accommodate its aging workforce with innovative practices.

VHDA is not a member of the Virginia Retirement System. VHDA's average retirement age is 65. Prior to 2009 the average retirement age was 62. VHDA believes the main drivers for retirement age are Social Security and Medicare. VHDA offers a 401 (k) savings plan and a 457 deferred compensation plan for associates to save for retirement.

VHDA is taking a number of steps to address succession planning and accommodate employees wishing to extend their working years. These include phasing out employees (cutting back on work hours prior to retirement), double filling roles prior to retirement to encourage mentoring and data transfer and allowing retirees to function in new roles. To address a major concern of talent and historical knowledge walking out the door, VHDA instituted a policy where if employees give management one year's notice, then VHDA will pay a bonus when they retire.