

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

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# PHA Plans

5 Year Plan for Fiscal Years 2003 - 2007  
Annual Plan for Fiscal Year 2003

**NOTE: THIS PHA PLANS TEMPLATE (HUD 50075) IS TO BE COMPLETED IN  
ACCORDANCE WITH INSTRUCTIONS LOCATED IN APPLICABLE PIH NOTICES**

## PHA Plan Agency Identification

**PHA Name:** Housing Authority of the City of Boulder

**PHA Number:** CO016

**PHA Fiscal Year Beginning: (mm/yyyy)** 01/2003

### Public Access to Information

Information regarding any activities outlined in this plan can be obtained by contacting: (select all that apply)

- Main administrative office of the PHA
- PHA development management offices (**PHA senior/disabled developments: Walnut Place, Northport, Canyon Pointe and Housing Authority website at [www.boulderhousing.org](http://www.boulderhousing.org)**)
- PHA local offices

### Display Locations For PHA Plans and Supporting Documents

The PHA Plans (including attachments) are available for public inspection at: (select all that apply)

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices
- Main administrative office of the local government
- Main administrative office of the County government
- Main administrative office of the State government
- Public library
- PHA website
- Other (list below)

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

- Main business office of the PHA
- PHA development management offices
- Other (list below)



**5-YEAR PLAN**  
**PHA FISCAL YEARS 2001 - 2005**  
[24 CFR Part 903.5]

**A. Mission**

State the PHA's mission for serving the needs of low-income, very low income, and extremely low-income families in the PHA's jurisdiction. (select one of the choices below)

- The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.
- The PHA's mission is: (state mission here)

The mission of the Housing Authority of the City of Boulder (HACB) is to develop and manage affordable housing for people of low and moderate incomes; to add to both affordability and sustainability of the HACB portfolio by building and/or acquiring new housing; and to seek out service partnerships to contribute to a healthy quality of life and a sense of community at each of our properties.

**B. Goals**

The goals and objectives listed below are derived from HUD's strategic Goals and Objectives and those emphasized in recent legislation. PHAs may select any of these goals and objectives as their own, or identify other goals and/or objectives. Whether selecting the HUD-suggested objectives or their own, **PHAS ARE STRONGLY ENCOURAGED TO IDENTIFY QUANTIFIABLE MEASURES OF SUCCESS IN REACHING THEIR OBJECTIVES OVER THE COURSE OF THE 5 YEARS.** (Quantifiable measures would include targets such as: numbers of families served or PHAS scores achieved.) PHAs should identify these measures in the spaces to the right of or below the stated objectives.

**HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.**

- PHA Goal: Expand the supply of assisted housing  
Objectives:
- Apply for additional rental vouchers:
  - Reduce public housing vacancies:
  - Leverage private or other public funds to create additional housing opportunities:
  - Acquire or build units or developments
  - Other (list below)
- PHA Goal: Improve the quality of assisted housing  
Objectives:

- Improve public housing management: (PHAS score)
- Improve voucher management: (SEMAP score)
- Increase customer satisfaction:
- Concentrate on efforts to improve specific management functions:  
(list; e.g., public housing finance; voucher unit inspections)
- Renovate or modernize public housing units:
- Demolish or dispose of obsolete public housing:
- Provide replacement public housing:
- Provide replacement vouchers:
- Other: (list below)

PHA Goal: Increase assisted housing choices

Objectives:

- Provide voucher mobility counseling:
- Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards
- Implement voucher homeownership program:
- Implement public housing or other homeownership programs:
- Implement public housing site-based waiting lists:
- Convert public housing to vouchers:
- Other: (list below)

**HUD Strategic Goal: Improve community quality of life and economic vitality**

PHA Goal: Provide an improved living environment

Objectives:

- Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:
- Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:
- Implement public housing security improvements:
- Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
- Other: (list below)

**HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals**

PHA Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- Increase the number and percentage of employed persons in assisted families:
- Provide or attract supportive services to improve assistance recipients' employability:
- Provide or attract supportive services to increase independence for the elderly or families with disabilities.
- Other: (list below)

**HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans**

- PHA Goal: Ensure equal opportunity and affirmatively further fair housing Objectives:
  - Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
  - Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
  - Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
  - Other: (list below)

**Other PHA Goals and Objectives: (list below)**

*"The Mission of HACB is to develop---*

**Goal 1 Acquire and develop new housing which responds to identified community affordable housing needs.**

*---and manage---*

**Goal 2 Effectively manage current operations and future growth.**

**Goal 3 Maintain a portfolio of a minimum of 1,000 units which are affordable to very low-income people.**

*---and seek our service partnerships to contribute to a healthy quality of life and a sense of community."*

**Goal 4 Strive to create a sense of community in all properties HACB builds, owns, and manages.**

**Goal 5 Be responsive to housing and welfare reform initiatives and seek program opportunities that encourage self-sufficiency.**



## Goals, Objectives and Timeline 2002 - 2006

HACB's goals and objectives support the Mission: "*--- to develop and manage affordable housing for people of low and moderate incomes; add to both affordability and sustainability of its portfolio by building and/or acquiring new housing; and seek out service partnerships to contribute to a healthy quality of life and a sense of community at each of its properties.*"

### **GOAL 1: ACQUIRE AND DEVELOP NEW HOUSING WHICH RESPONDS TO IDENTIFIED COMMUNITY HOUSING NEEDS.**

#### **GUIDING PRINCIPLES:**

- Pursue a mixed-income strategy in which at least 20% of new development will provide housing for households earning < 60% of AMI.
- Evaluate every development for the opportunity to provide the maximum number of units affordable to households earning < 30% AMI.
- Work in partnership with the private sector, non-profits and service agencies to develop housing that is affordable and appropriate for the community.
- Work collaboratively with the larger Boulder community, and utilize existing information sources, to identify housing needs.
- Continue to provide housing that is affordable to entry level and service workers.

#### **ACTION OBJECTIVES:**

##### **Years 2002 - 2003**

- a) Develop the Drive-In-Theater (4650 Broadway) so that 35% of the units are permanently affordable to low and moderate income households.
- b) Develop the Foothills property so that 40% of the units are permanently affordable to low- and moderate-income households.
- c) When possible, acquire properties in geographic areas within the city of Boulder where there are a limited number of affordable units, and where services, shopping, public transit, schools and employment are in close proximity. **20 Units or more per year**

##### **Year 2002+**

- d) Evaluate the feasibility of acquiring temporary housing units for families at the top of HACB's waiting list to facilitate a more rapid turn over of units in the public housing portfolio.

## **GOAL 2: EFFECTIVELY MANAGE CURRENT OPERATIONS AND FUTURE GROWTH.**

### **GUIDING PRINCIPLES:**

- Enhance asset management and capital improvement-planning strategies.
- Increase and maintain staff development opportunities.
- Selectively invest operating reserves in current and new development and current operations.

### **ACTION OBJECTIVES:**

#### **Years 2002 - 2003**

- a) Refinance properties to enhance the short- and long-term financial position of the HACB.
- b) Understand the most effective organizational role for Diversified Properties.
- c) Develop a strategy to fund all properties with sufficient replacement and operating reserves.
- d) Pursue new office space to consolidate operations into one location.
- e) Develop a public relations and marketing strategy designed to support current partners and HACB's primary objectives.

#### **Year 2002+**

- f) Achieve new efficiencies through reorganization of management systems and employment of current technologies, while continuing to meet the goals of HUD's management assessment instruments, including but not limited to:
  - Complete computerized budget process
  - Complete records storage project
  - Complete conversion to integrated software
  - Adjust HUD accounting procedures to be fully GAAP compliant
- g) Evaluate the opportunity to redevelop public housing properties consistent with a mixed-income strategy, assuring, however, that redevelopment will not result in a loss of housing that is affordable to the current households served by the public housing program.
- h) Establish a non-profit organization to provide HACB with more flexibility in shifting its reliance on the federal government to the greater community.

**GOAL 3: MAINTAIN A PORTFOLIO OF A MINIMUM OF 1,000 UNITS WHICH ARE AFFORDABLE TO VERY LOW-INCOME PEOPLE.**

**GUIDING PRINCIPLES:**

- Pursue rent strategies in which rents are set as low as possible and can sustain operations with or without HUD subsidy.
- Structure new development so it breaks even in the first three years of operation and generates cash flow that can be used to provide financial support to those properties whose rental income is insufficient to sustain operations.
- Evaluate entrepreneurial activities that would support the continued provision of quality, community-based housing for people of low incomes and would also create employment opportunities for our residents.
- Enhance the partnership with the City of Boulder so that policies become more favorable toward the production and retention of housing that is affordable to low-to- moderate-income households, and to the increase of the land supply and resources devoted to housing.

**ACTION OBJECTIVES:**

Evaluate a strategy in which assisted units and moderate units are mixed and distributed across the entire portfolio.

**GOAL 4: STRIVE TO CREATE A SENSE OF COMMUNITY IN ALL PROPERTIES HACB BUILDS, OWNS, AND MANAGES.**

**GUIDING PRINCIPLES:**

- Enhance management strategies which recognize a respectful relationship between residents, their community, and HACB staff.
- Through design, provide opportunities to create and sustain a sense of community so that residents of Housing Authority properties can become an integral part of the neighborhood.

**ACTION OBJECTIVES:**

**Years 2002 - 2003**

- a) Successfully implement a site-based management model and integrate operations at the property level.
- b) Implement initiatives that encourage collaboration among residents, staff, neighborhoods, and the greater community to create healthier HACB communities.

**Years 2002+**

- a) In response to the results of the 2000 RASS Customer Service and Satisfaction Survey, the Housing Authority will work with the Housing Authority communities and the Boulder Police Department to facilitate the implementation of Neighborhood Watch programs.
- b) In response to the 2000 results of the RASS Customer Service and Satisfaction Survey, the Housing Authority will work to continue the Adopt-A-Site partnership with the Boulder Police Department to further ensure police presence on Housing Authority properties.
- c) In response to the results of the 2000 RASS Customer Service and Satisfaction Survey, the Housing Authority will continue to work on upgrading and increasing lighting on sites and identifying and implementing environmental design techniques that will help reduce the likelihood of crime.
- d) In response to the results of the 2000 Customer Service and Satisfaction Survey, the Housing Authority will strive in 2002 to increase its communications with residents through the quarterly newsletter and site notices. Construction and maintenance work will also be communicated through notices in both English and Spanish.

**GOAL 5: BE RESPONSIVE TO HOUSING AND WELFARE REFORM INITIATIVES AND SEEK PROGRAM OPPORTUNITIES THAT ENCOURAGE SELF-SUFFICIENCY.**

**ACTION OBJECTIVES:**

**Years 2002 - 2003**

- a) Develop partnerships with service agencies so that a response framework is established that provides a maximum of choice and responsibility to residents while they live with HACB. In partnership with these agencies, HACB will provide access to:
  - 1. Information
  - 2. Advocacy
  - 3. Mediation
  - 4. Facilitation
  - 5. Referral
  - 6. Enrichment
  - 7. Education
- b) Facilitate partnerships that provide access to economic development and other service opportunities for HACB residents.

**Year 2002**

- d) Seek long-term funding to fully staff and support resident self-sufficiency programs that are implemented by the Housing Authority of the City of Boulder in partnership with other community-based organizations and employers

**Year 2003**

- e) Create new community and supportive service programs that are designed to promote upward mobility, independence and improved quality of life at targeted housing developments.



**Annual PHA Plan  
PHA Fiscal Year 2003**

[24 CFR Part 903.7]

**i. Annual Plan Type:**

Select which type of Annual Plan the PHA will submit.

**Standard Plan**

**Streamlined Plan:**

- High Performing PHA**
- Small Agency (<250 Public Housing Units)**
- Administering Section 8 Only**

**Troubled Agency Plan**

**ii. Executive Summary of the Annual PHA Plan**

[24 CFR Part 903.7 9 (r)]

**Executive Summary**

This Annual Plan covers the period January 1, 2003 through December 31, 2003. It is written in eighteen sections, as described in the Table of Contents. All sections are included in this submittal.

Our preparation of this Plan began in 1998 with a strategic planning process. The result of that process was both a Business Plan and a Strategic Plan. The Strategic Plan is submitted in its entirety as the "Five Year Plan".

Our Annual Plan says that Boulder will continue to be an expensive housing market, requiring family incomes greater than \$100,000 to purchase a home and greater than \$35,000 to rent a two-bedroom apartment. The Housing Authority will continue to effectively manage our existing inventory of 505 assisted housing units, 360 reduced rent and market units and 606 Section 8 vouchers, while continuing to apply for additional vouchers to take advantage of a soft rental market. At the same time, we will actively contribute to the City's goal of making 10% of its housing stock affordable by acquiring and developing new property.

The Public Hearing on this plan was held on October 10, 2002 at 6:30 pm at 700 Walnut, Canyon Pointe Apartments.

**iii. Annual Plan Table of Contents**

[24 CFR Part 903.7 9 (r)]

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**Attachments**

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

**Required Attachments:**

- Admissions Policy for De-concentration
- FY 2002 Capital Fund Program Annual Statement
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

**Optional Attachments:**

- PHA Management Organizational Chart
- FY 2002 Capital Fund Program 5 Year Action Plan
- Public Housing Drug Elimination Program (PHDEP) Plan
- Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text)
- Other (List below, providing each attachment name)

**Supporting Documents Available for Review**

Indicate which documents are available for public review by placing a mark in the "Applicable & On Display" column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
<b>HMO</b>	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
<b>HMO</b>	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
<b>HMO</b>	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions' initiatives to affirmatively further fair housing that require the PHA's involvement. Affirmative Fair Housing Market Plan.	5 Year and Annual Plans

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
<b>HMO</b>	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
<b>HMO</b>	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
<b>HMO</b>	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
<b>HMO</b>	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
<b>HMO</b>	Public Housing Deconcentration and Income Mixing Documentation: 1. PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 2. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
<b>HMO</b>	Public housing rent determination policies, including the methodology for setting public housing flat rents <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
<b>HMO</b>	Schedule of flat rents offered at each public housing development <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
<b>HMO</b>	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
<b>HMO/Maintenance Office</b>	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
<b>HMO</b>	Public housing grievance procedures <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
<b>HMO</b>	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
<b>HMO</b>	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
	Most recent CIAP Budget/Progress Report (HUD 52825) for	Annual Plan: Capital Needs

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
	any active CIAP grant	
<b>HMO</b>	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	N/A
	Approved or submitted applications for demolition and/or disposition of public housing	N/A
<b>HMO</b>	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	N/A
	Approved or submitted public housing homeownership programs/plans	
	Policies governing any Section 8 Homeownership program <input type="checkbox"/> check here if included in the Section 8 Administrative Plan	
	Any cooperative agreement between the PHA and the TANF agency	
<b>HMO</b>	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & SH -Sufficiency
	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	
<b>HMO</b>	The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
<b>HMO</b>	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
	Troubled PHAs: MOA/Recovery Plan	
	Other supporting documents (optional) (list individually; use as many lines as necessary)	

## **1. Statement of Housing Needs**

[24 CFR Part 903.7 9 (a)]

### **A. Housing Needs of Families in the Jurisdiction/s Served by the PHA**

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the "Overall" Needs column, provide the estimated number of renter

families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being “no impact” and 5 being “severe impact.” Use N/A to indicate that no information is available upon which the PHA can make this assessment.

<b>Housing Needs of Families in the Jurisdiction by Family Type</b>							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	4,989	5	5	5	5	5	2
Income >30% but <=50% of AMI	3,606	5	5	3	4	2	2
Income >50% but <80% of AMI	5,574	3	5	3	3	2	2
Elderly	6,532	5	2	2	2	0	2
Families with Disabilities	n/a	5	5	3	5	0	4
African Americans	Informa-tion not availabl-e						
Hispanic	Info not availabl-e						
Asian/Pacific Islander	Info not availabl-e						

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

- Consolidated Plan of the Jurisdiction/s  
Indicate year: 1997
- U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset
- American Housing Survey data  
Indicate year:
- Other housing market study  
Indicate year: 1999
- Other sources: (list and indicate year of information)

## B. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input type="checkbox"/> Public Housing			
<input checked="" type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	1947		140
Extremely low income <=30% AMI	1927	99%	
Very low income (>30% but <=50% AMI)	20	1%	
Low income (>50% but <80% AMI)	0%	0%	
Families with children	875	45%	
Elderly families	237	12%	
Families with Disabilities	614	32%	
Hispanic	553	28%	
Caucasian	1275	66%	
African American	83	4%	
Asian/American Indian	36	2%	
Characteristics by			

<b>Housing Needs of Families on the Waiting List</b>			
Bedroom Size (Public Housing Only)			
1BR	759	39%	
2 BR	818	42%	
3 BR	312	16%	
4 BR	78	4%	
5 BR	0		
5+ BR	0		
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)?			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes			

### **C. Strategy for Addressing Needs**

Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list **IN THE UPCOMING YEAR**, and the Agency's reasons for choosing this strategy.

#### **(1) Strategies**

**Need: Shortage of affordable housing for all eligible populations**

**Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:**

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required

- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

**Strategy 2: Increase the number of affordable housing units by:**

Select all that apply

- Apply for additional section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed - finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- Other: (list below)

**Need: Specific Family Types: Families at or below 30% of median**

**Strategy 1: Target available assistance to families at or below 30 % of AMI**

Select all that apply

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- Employ admissions preferences aimed at families with economic hardships
- Adopt rent policies to support and encourage work
- Other: (list below)

**Need: Specific Family Types: Families at or below 50% of median**

**Strategy 1: Target available assistance to families at or below 50% of AMI**

Select all that apply

- Employ admissions preferences aimed at families who are working
- Adopt rent policies to support and encourage work
- Other: (list below)

**Need: Specific Family Types: The Elderly**

**Strategy 1: Target available assistance to the elderly:**

Select all that apply

- Seek designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become available
- Other: (list below)

**Need: Specific Family Types: Families with Disabilities**

**Strategy 1: Target available assistance to Families with Disabilities:**

Select all that apply

- Seek designation of public housing for families with disabilities
- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- Affirmatively market to local non-profit agencies that assist families with disabilities
- Other: (list below)

**Need: Specific Family Types: Races or ethnicities with disproportionate housing needs**

**Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:**

Select if applicable

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- Other: (list below)

**Strategy 2: Conduct activities to affirmatively further fair housing**

Select all that apply

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority concentrations
- Other: (list below)

**Other Housing Needs & Strategies: (list needs and strategies below)**

**(2) Reasons for Selecting Strategies**

Of the factors listed below, select all that influenced the PHA’s selection of the strategies it will pursue:

- Funding constraints
- Staffing constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence of the housing market on PHA programs
- Community priorities regarding housing assistance
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board
- Results of consultation with advocacy groups
- Other: (list below)

**2. Statement of Financial Resources**

[24 CFR Part 903.7 9 (b)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2002 grants)</b>		
a) Public Housing Operating Fund	\$188,352	
b) Public Housing Capital Fund	\$540,000	
c) HOPE VI Revitalization	0	
d) HOPE VI Demolition	0	
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$4,579,529.70	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	\$94,100	
g) Resident Opportunity and Self-Sufficiency Grants	0	

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
h) Community Development Block Grant	\$130,000	
i) HOME		
Other Federal Grants (list below)		
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>	0	
Capital Fund	\$120,000	Public Housing Renovation
Public Housing Drug Elimination Grant	\$0	Crime Prevention
CDBG	\$0	Fire Protection Installation
<b>3. Public Housing Dwelling Rental Income</b>	\$1,338,935	
<b>4. Other income (list below)</b>	\$32,700—laundry \$17,400--maintenance income	
Laundry, maintenance, interest etc. . .	\$21,095—interest	
	\$2,644.00—misc.	
<b>4. Non-federal sources (list below)</b>		
<b>CHAP—Community Housing Assistance Program</b>	\$50,000	Fire Protection Installation
<b>Total resources</b>	\$7,114,755.70	

### **3. PHA Policies Governing Eligibility, Selection, and Admissions**

[24 CFR Part 903.7 9 (c)]

#### **A. Public Housing**

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

**(1) Eligibility**

a. When does the PHA verify eligibility for admission to public housing? (select all that apply)

- When families are within a certain number of being offered a unit: (state number): 20
- When families are within a certain time of being offered a unit: (state time)
- Other: (describe)

b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?

- Criminal or Drug-related activity
- Rental history
- Housekeeping
- Other (describe)

c.  Yes  No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

d.  Yes  No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?

e.  Yes  No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)

**(2)Waiting List Organization**

a. Which methods does the PHA plan to use to organize its public housing waiting list (select all that apply)

- Community-wide list
- Sub-jurisdictional lists
- Site-based waiting lists
- Other (describe)

b. Where may interested persons apply for admission to public housing?

- PHA main administrative office
- PHA development site management office
- Other (list below)

c. If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection **(3) Assignment**

1. How many site-based waiting lists will the PHA operate in the coming year?0

2.  Yes  No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?  
If yes, how many lists?
3.  Yes  No: May families be on more than one list simultaneously  
If yes, how many lists?
4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?
- PHA main administrative office
  - All PHA development management offices
  - Management offices at developments with site-based waiting lists
  - At the development to which they would like to apply
  - Other (list below)

**(3) Assignment**

- a. How many vacant unit choices are applicants ordinarily given before they fall to the bottom of or are removed from the waiting list? (select one)
- One
  - Two
  - Three or More
- b.  Yes  No: Is this policy consistent across all waiting list types?
- c. If answer to b is no, list variations for any other than the primary public housing waiting list/s for the PHA:

**(4) Admissions Preferences**

- a. Income targeting:
- Yes  No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of median area income?
- b. Transfer policies:  
In what circumstances will transfers take precedence over new admissions? (list below)
- Emergencies
  - Overhoused

- Underhoused
  - Medical justification
  - Administrative reasons determined by the PHA (e.g., to permit modernization work)
  - Resident choice: (state circumstances below)
  - Other: (list below)
- Safety and Reasonable Accommodation

c. Preferences

1.  Yes  No: Has the PHA established preferences for admission to public housing (other than date and time of application)? (If “no” is selected, skip to subsection **(5) Occupancy**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences: (select below)

- Working families and those unable to work because of age or disability
  - Veterans and veterans’ families
  - Residents who live and/or work in the jurisdiction
  - Those enrolled currently in educational, training, or upward mobility programs
  - Households that contribute to meeting income goals (broad range of incomes)
  - Households that contribute to meeting income requirements (targeting)
  - Those previously enrolled in educational, training, or upward mobility programs
  - Victims of reprisals or hate crimes
  - Other preference(s) (list below)
- The Housing Authority works with local service providers and accepts limited referrals for housing programs from a group called Community Outreach Resource Effort.***

3. If the PHA will employ admissions preferences, please prioritize by placing a “1” in the space that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either

through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

## 1 Date and Time

Former Federal preferences:

- 1 Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

***The Housing Authority works with local service providers and accepts limited referrals for housing programs from a group called Community Outreach Resource Effort.***

4. Relationship of preferences to income targeting requirements:

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

## **(5) Occupancy**

a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)

- The PHA-resident lease
- The PHA's Admissions and (Continued) Occupancy policy
- PHA briefing seminars or written materials
- Other source (list) Resident Handbook, Resident Newsletter

b. How often must residents notify the PHA of changes in family composition?

(select all that apply)

- At an annual reexamination and lease renewal

- Any time family composition changes
- At family request for revision
- Other (list)

**(6) Deconcentration and Income Mixing**

a.  Yes  No: Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

b.  Yes  No: Did the PHA adopt any changes to its **admissions policies** based on the results of the required analysis of the need to promote deconcentration of poverty or to assure income mixing?

c. If the answer to b was yes, what changes were adopted? (select all that apply)

Adoption of site based waiting lists  
If selected, list targeted developments below:

Employing waiting list "skipping" to achieve deconcentration of poverty or income mixing goals at targeted developments  
If selected, list targeted developments below:

Employing new admission preferences at targeted developments  
If selected, list targeted developments below:

Other (list policies and developments targeted below)

d.  Yes  No: Did the PHA adopt any changes to **other** policies based on the results of the required analysis of the need for deconcentration of poverty and income mixing?

e. If the answer to d was yes, how would you describe these changes? (select all that apply)

- Additional affirmative marketing
- Actions to improve the marketability of certain developments
- Adoption or adjustment of ceiling rents for certain developments
- Adoption of rent incentives to encourage deconcentration of poverty and income-mixing

Other (list below)

f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)

Not applicable: results of analysis did not indicate a need for such efforts

List (any applicable) developments below:

g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)

Not applicable: results of analysis did not indicate a need for such efforts

List (any applicable) developments below:

## B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B. Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).

### (1) Eligibility

a. What is the extent of screening conducted by the PHA? (select all that apply)

Criminal or drug-related activity only to the extent required by law or regulation

Criminal and drug-related activity, more extensively than required by law or regulation

More general screening than criminal and drug-related activity (list factors below)

Other (list below)

b.  Yes  No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

c.  Yes  No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?

d.  Yes  No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)

e. Indicate what kinds of information you share with prospective landlords? (select all that apply)

Criminal or drug-related activity

Other (describe below)--Address of last known address for applicant.

**(2) Waiting List Organization**

a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)

- None
- Federal public housing
- Federal moderate rehabilitation
- Federal project-based certificate program
- Other federal or local program (list below)

b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)

- PHA main administrative office
- Other (list below)

**(3) Search Time**

a.  Yes  No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below:

To accommodate a disability, for a hard-to-house family, verified medical reason.

**(4) Admissions Preferences**

a. Income targeting

Yes  No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

b. Preferences

1.  Yes  No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

***Limited referrals from Community Outreach Resource Group (CORE) comprised of our partners in the community—Boulder County SafeHouse, Boulder County Project Self-Sufficiency, Center for People with Disabilities, Emergency Family Assistance, and Diversified Properties.***

3. If the PHA will employ admissions preferences, please prioritize by placing a “1” in the space that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

1            Date and Time

Former Federal preferences

- 1        Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families

- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

***Limited referrals from Community Outreach Resource Group (CORE) comprised of our partners in the community—Boulder County SafeHouse, Boulder County Project Self-Sufficiency, Center for People with Disabilities, Emergency Family Assistance, and Diversified Properties.***

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (select one)

- Date and time of application
- Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for “residents who live and/or work in the jurisdiction” (select one)

- This preference has previously been reviewed and approved by HUD
- The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

**(5) Special Purpose Section 8 Assistance Programs**

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

- The Section 8 Administrative Plan
- Briefing sessions and written materials
- Other (list below)

b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

- Through published notices  
 Other (list below)

#### **4. PHA Rent Determination Policies**

[24 CFR Part 903.7 9 (d)]

##### **A. Public Housing**

Exemptions: PHAs that do not administer public housing are not required to complete sub-component 4A.

##### **(1) Income Based Rent Policies**

Describe the PHA's income based rent setting policy/ies for public housing using, including discretionary (that is, not required by statute or regulation) income disregards and exclusions, in the appropriate spaces below.

a. Use of discretionary policies: (select one)

- The PHA will not employ any discretionary rent-setting policies for income based rent in public housing. Income-based rents are set at the higher of 30% of adjusted monthly income, 10% of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions). (If selected, skip to sub-component (2))

---or---

- The PHA employs discretionary policies for determining income based rent (If selected, continue to question b.)

b. Minimum Rent

1. What amount best reflects the PHA's minimum rent? (select one)

- \$0  
 \$1-\$25  
 \$26-\$50

2.  Yes  No: Has the PHA adopted any discretionary minimum rent hardship exemption policies?

3. If yes to question 2, list these policies below:

c. Rents set at less than 30% than adjusted income

1.  Yes  No: Does the PHA plan to charge rents at a fixed amount or percentage less than 30% of adjusted income?

2. If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below:

d. Which of the discretionary (optional) deductions and/or exclusions policies does the PHA plan to employ (select all that apply)

For the earned income of a previously unemployed household member

For increases in earned income

Fixed amount (other than general rent-setting policy)

If yes, state amount/s and circumstances below:

***If the family's income increases less than \$250 gross income per month, the Housing Authority will not process a rent increase.***

Fixed percentage (other than general rent-setting policy)

If yes, state percentage/s and circumstances below:

For household heads

For other family members

For transportation expenses

For the non-reimbursed medical expenses of non-disabled or non-elderly families

Other (describe below)

e. Ceiling rents

1. Do you have ceiling rents? (rents set at a level lower than 30% of adjusted income) (select one)

Yes for all developments

Yes but only for some developments

No

2. For which kinds of developments are ceiling rents in place? (select all that apply)

- For all developments
- For all general occupancy developments (not elderly or disabled or elderly only)
- For specified general occupancy developments
- For certain parts of developments; e.g., the high-rise portion
- For certain size units; e.g., larger bedroom sizes
- Other (list below)

3. Select the space or spaces that best describe how you arrive at ceiling rents (select all that apply)

- Market comparability study
- Fair market rents (FMR)
- 95<sup>th</sup> percentile rents
- 75 percent of operating costs
- 100 percent of operating costs for general occupancy (family) developments
- Operating costs plus debt service
- The “rental value” of the unit
- Other (list below)

f. Rent re-determinations:

1. Between income reexaminations, how often must tenants report changes in income or family composition to the PHA such that the changes result in an adjustment to rent? (select all that apply)

- Never
- At family option
- Any time the family experiences an income increase
- Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold): More than \$250/month gross income
- Other (list below)

***If the family's income decreases, the Housing Authority will adjust the rent for the 1<sup>st</sup> of the following month if the change was reported by the 20<sup>th</sup> of the month.***

g.  Yes  No: Does the PHA plan to implement individual savings accounts for residents (ISAs) as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases in the next year?

**(2) Flat Rents**

1. In setting the market-based flat rents, what sources of information did the PHA use to establish comparability? (select all that apply.)

- The section 8 rent reasonableness study of comparable housing
- Survey of rents listed in local newspaper
- Survey of similar unassisted units in the neighborhood
- Other (list/describe below)

*Flat rents are based on Area Median Income levels and established to be affordable at 50% of AMI.*

**B. Section 8 Tenant-Based Assistance**

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete sub-component 4B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

**(1) Payment Standards**

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard? (select the category that best describes your standard)

- At or above 90% but below 100% of FMR
- 100% of FMR
- Above 100% but at or below 110% of FMR
- Above 110% of FMR (if HUD approved; describe circumstances below)

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply)

- FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- The PHA has chosen to serve additional families by lowering the payment standard
- Reflects market or submarket
- Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)

- FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- Reflects market or submarket
- To increase housing options for families

Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)

Annually

Other (list below)

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)

Success rates of assisted families

Rent burdens of assisted families

Other (list below)

## **(2) Minimum Rent**

a. What amount best reflects the PHA's minimum rent? (select one)

\$0

\$1-\$25

\$26-\$50

b.  Yes  No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

## **5. Operations and Management**

[24 CFR Part 903.7 9 (e)]

Exemptions from Component 5: High performing and small PHAs are not required to complete this section. Section 8 only PHAs must complete parts A, B, and C(2)

### **A. PHA Management Structure**

Describe the PHA's management structure and organization.

(select one)

An organization chart showing the PHA's management structure and organization is attached.

A brief description of the management structure and organization of the PHA follows:

### **B. HUD Programs Under PHA Management**

List Federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year, and expected turnover in each. (Use "NA" to indicate that the PHA does not operate any of the programs listed below.)

<b>Program Name</b>	<b>Units or Families Served at Year Beginning</b>	<b>Expected Turnover</b>
Public Housing	383	50
Section 8 Vouchers	606	120
Section 8 Certificates	0	0
Section 8 Mod Rehab	124	25
Special Purpose Section 8 Certificates/Vouchers:	0	0
Public Housing Drug Elimination Program (PHDEP)	200	
Other Federal Programs(list individually)		

### **C. Management and Maintenance Policies**

List the PHA's public housing management and maintenance policy documents, manuals and handbooks that contain the Agency's rules, standards, and policies that govern maintenance and management of public housing, including a description of any measures necessary for the prevention or eradication of pest infestation (which includes cockroach infestation) and the policies governing Section 8 management.

(1) Public Housing Maintenance and Management: (list below)

1. Maintenance Policy and Operations Manual

(2) Section 8 Management: (list below)

1. Administrative Plan for the Section 8 Program

### **6. PHA Grievance Procedures**

[24 CFR Part 903.7 9 (f)]

Exemptions from component 6: High performing PHAs are not required to complete component 6. Section 8-Only PHAs are exempt from sub-component 6A.

**A. Public Housing**

1.  Yes  No: Has the PHA established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing?

If yes, list additions to federal requirements below:

2. Which PHA office should residents or applicants to public housing contact to initiate the PHA grievance process? (select all that apply)

- PHA main administrative office  
 PHA development management offices  
 Other (list below)

**B. Section 8 Tenant-Based Assistance**

1.  Yes  No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

If yes, list additions to federal requirements below:

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (select all that apply)

- PHA main administrative office  
 Other (list below)

**7. Capital Improvement Needs**

[24 CFR Part 903.7 9 (g)]

Exemptions from Component 7: Section 8 only PHAs are not required to complete this component and may skip to Component 8.

**A. Capital Fund Activities**

Exemptions from sub-component 7A: PHAs that will not participate in the Capital Fund Program may skip to component 7B. All other PHAs must complete 7A as instructed.

**(1) Capital Fund Program Annual Statement**

Using parts I, II, and III of the Annual Statement for the Capital Fund Program (CFP), identify capital activities the PHA is proposing for the upcoming year to ensure long-term physical and social viability of its public housing developments. This statement can be completed by using the CFP Annual Statement tables provided in the table library at the end of the PHA Plan template **OR**, at the PHA's option, by completing and attaching a properly updated HUD-52837.

Select one:

The Capital Fund Program Annual Statement is provided as an attachment to the PHA Plan at Attachment (state name) 1

-or-

The Capital Fund Program Annual Statement is provided below: (if selected, copy the CFP Annual Statement from the Table Library and insert here)

## **(2) Optional 5-Year Action Plan**

Agencies are encouraged to include a 5-Year Action Plan covering capital work items. This statement can be completed by using the 5 Year Action Plan table provided in the table library at the end of the PHA Plan template **OR** by completing and attaching a properly updated HUD-52834.

a.  Yes  No: Is the PHA providing an optional 5-Year Action Plan for the Capital Fund? (if no, skip to sub-component 7B)

b. If yes to question a, select one:

The Capital Fund Program 5-Year Action Plan is provided as an attachment to the PHA Plan at Attachment (state name)

-or-

The Capital Fund Program 5-Year Action Plan is provided below: (if selected, copy the CFP optional 5 Year Action Plan from the Table Library and insert here)

## **B. HOPE VI and Public Housing Development and Replacement Activities (Non-Capital Fund)**

Applicability of sub-component 7B: All PHAs administering public housing. Identify any approved HOPE VI and/or public housing development or replacement activities not described in the Capital Fund Program Annual Statement.

Yes  No: a) Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c; if yes, provide responses to question b for each grant, copying and completing as many times as necessary)

b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name:
2. Development (project) number:
3. Status of grant: (select the statement that best describes the current status)

- Revitalization Plan under development
- Revitalization Plan submitted, pending approval
- Revitalization Plan approved
- Activities pursuant to an approved Revitalization Plan underway

Yes  No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?  
If yes, list development name/s below:

Yes  No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?  
If yes, list developments or activities below:

Yes  No: e) Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?  
If yes, list developments or activities below:

## **8. Demolition and Disposition**

[24 CFR Part 903.7 9 (h)]

Applicability of component 8: Section 8 only PHAs are not required to complete this section.

1.  Yes  No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If “No”, skip to component 9; if “yes”, complete one activity description for each development.)

### 2. Activity Description

Yes  No: Has the PHA provided the activities description information in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 9. If “No”, complete the Activity Description table below.)

<b>Demolition/Disposition Activity Description</b>	
1a. Development name:	Broadway
1b. Development (project) number:	Management Office
2. Activity type:	Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one)	Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission:	<u>01/01/2003 or later</u>
5. Number of units affected:	0
6. Coverage of action (select one)	<input checked="" type="checkbox"/> Part of the development: Housing Management Office Only <input type="checkbox"/> Total development
7. Timeline for activity:	a. Actual or projected start date of activity: January 2003 b. Projected end date of activity: March 2003

## **9. Designation of Public Housing for Occupancy by Elderly Families or Families with Disabilities or Elderly Families and Families with Disabilities**

[24 CFR Part 903.7 9 (i)]

Exemptions from Component 9; Section 8 only PHAs are not required to complete this section.

1.  Yes  No: Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year? (If “No”, skip to component 10. If “yes”, complete one activity description for each development, unless the PHA is eligible to complete a streamlined submission; PHAs completing streamlined submissions may skip to component 10.)

### 2. Activity Description

- Yes  No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing

Asset Management Table? If “yes”, skip to component 10. If “No”, complete the Activity Description table below.

<b>Designation of Public Housing Activity Description</b>	
1a. Development name: Walnut Place	
1b. Development (project) number: C006P016003	
2. Designation type:	
Occupancy by only the elderly	<input checked="" type="checkbox"/>
Occupancy by families with disabilities	<input type="checkbox"/>
Occupancy by only elderly families and families with disabilities	<input type="checkbox"/>
3. Application status (select one)	
Approved; included in the PHA’s Designation Plan	<input checked="" type="checkbox"/>
Submitted, pending approval	<input type="checkbox"/>
Planned application	<input type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: (DD/MM/YY)	
9/9/97 Approved; 08/01/2002 Approval Extended	
5. If approved, will this designation constitute a (select one)	
<input type="checkbox"/> New Designation Plan	
<input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?	
6. Number of units affected: 95	
7. Coverage of action (select one)	
<input type="checkbox"/> Part of the development	
<input checked="" type="checkbox"/> Total development	

**10. Conversion of Public Housing to Tenant-Based Assistance**

[24 CFR Part 903.7 9 (j)]

Exemptions from Component 10; Section 8 only PHAs are not required to complete this section.

**A. Assessments of Reasonable Revitalization Pursuant to section 202 of the HUD FY 1996 HUD Appropriations Act**

1.  Yes  No: Have any of the PHA’s developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act? (If “No”, skip to component 11; if “yes”, complete one activity description for each identified development, unless eligible to complete a streamlined submission. PHAs completing streamlined submissions may skip to component 11.)

2. Activity Description

Yes  No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to component 11. If “No”, complete the Activity Description table below.

<b>Conversion of Public Housing Activity Description</b>	
1a. Development name:	
1b. Development (project) number:	
2. What is the status of the required assessment?	<input type="checkbox"/> Assessment underway <input type="checkbox"/> Assessment results submitted to HUD <input type="checkbox"/> Assessment results approved by HUD (if marked, proceed to next question) <input type="checkbox"/> Other (explain below)
3. <input type="checkbox"/> Yes <input type="checkbox"/> No: Is a Conversion Plan required? (If yes, go to block 4; if no, go to block 5.)	
4. Status of Conversion Plan (select the statement that best describes the current status)	<input type="checkbox"/> Conversion Plan in development <input type="checkbox"/> Conversion Plan submitted to HUD on: (DD/MM/YYYY) <input type="checkbox"/> Conversion Plan approved by HUD on: (DD/MM/YYYY) <input type="checkbox"/> Activities pursuant to HUD-approved Conversion Plan underway
5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one)	<input type="checkbox"/> Units addressed in a pending or approved demolition application (date submitted or approved: _____) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved: _____) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI Revitalization Plan (date submitted or approved: _____) <input type="checkbox"/> Requirements no longer applicable: vacancy rates are less than 10 percent <input type="checkbox"/> Requirements no longer applicable: site now has less than 300 units <input type="checkbox"/> Other: (describe below)

**B. Reserved for Conversions pursuant to Section 22 of the U.S. Housing Act of 1937**

**C. Reserved for Conversions pursuant to Section 33 of the U.S. Housing Act of 1937**

## 11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 9 (k)]

### **A. Public Housing**

Exemptions from Component 11A: Section 8 only PHAs are not required to complete 11A.

1.  Yes  No: Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to component 11B; if “yes”, complete one activity description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing PHA** status. PHAs completing streamlined submissions may skip to component 11B.)

#### 2. Activity Description

- Yes  No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 12. If “No”, complete the Activity Description table below.)

<b>Public Housing Homeownership Activity Description (Complete one for each development affected)</b>
1a. Development name: 1b. Development (project) number:
2. Federal Program authority: <input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one) <input type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (DD/MM/YYYY)

5. Number of units affected:
6. Coverage of action: (select one)
- Part of the development
- Total development

## B. Section 8 Tenant Based Assistance

1.  Yes  No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If “No”, skip to component 12; if “yes”, describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. **High performing PHAs** may skip to component 12.)

### 2. Program Description:

#### a. Size of Program

- Yes  No: Will the PHA limit the number of families participating in the section 8 homeownership option?

If the answer to the question above was yes, which statement best describes the number of participants? (select one)

- 25 or fewer participants
- 26 - 50 participants
- 51 to 100 participants
- more than 100 participants

#### b. PHA-established eligibility criteria

- Yes  No: Will the PHA’s program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria?

If yes, list criteria below:

## **12. PHA Community Service and Self-sufficiency Programs**

[24 CFR Part 903.7 9 (1)]

Exemptions from Component 12: High performing and small PHAs are not required to complete this component. Section 8-Only PHAs are not required to complete sub-component C.

### A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

- Yes  No: Has the PHA entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

If yes, what was the date that agreement was signed? DD/MM/YY

2. Other coordination efforts between the PHA and TANF agency (select all that apply)

- Client referrals  
 Information sharing regarding mutual clients (for rent determinations and otherwise)  
 Coordinate the provision of specific social and self-sufficiency services and programs to eligible families  
 Jointly administer programs  
 Partner to administer a HUD Welfare-to-Work voucher program  
 Joint administration of other demonstration program  
 Other (describe)

**B. Services and programs offered to residents and participants**

**(1) General**

a. Self-Sufficiency Policies

Which, if any of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families in the following areas? (select all that apply)

- Public housing rent determination policies  
 Public housing admissions policies  
 Section 8 admissions policies  
 Preference in admission to section 8 for certain public housing families  
 Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA  
 Preference/eligibility for public housing homeownership option participation  
 Preference/eligibility for section 8 homeownership option participation  
 Other policies (list below):

- Policy creating our Healthy Communities Initiative

b. Economic and Social self-sufficiency programs

Yes  No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If “yes”, complete the following table; if “no” skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use. )

Program Name & Description (including location, if appropriate)	Estimated Size	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Job training	45	FSS	both
Life skills training	45	FSS	both
College planning	45	FSS	both
Case management services	45	FSS	both
Computer Lab	45	FSS	both
Career Closet	45	FSS	both
Counseling	45	FSS	both
Mentoring	45	FSS	both
FSS Escrow	45	FSS	Section 8

**(2) Family Self Sufficiency program/s**

a. Participation Description

<b>Family Self Sufficiency (FSS) Participation</b>		
Program	Required Number of Participants (start of FY 2000 Estimate)	Actual Number of Participants (As of: DD/MM/YY)
Public Housing	0	0
Section 8	84	34 as of 08/28/2002

b.  Yes  No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size?

If no, list steps the PHA will take below:

1. *More information provided at Section 8 briefings.*
2. *Work with our partner-provider to meet the minimum program size.*

3. *Additional information provided at all annual recertification.*

**C. Welfare Benefit Reductions**

1. The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)

- Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies
- Informing residents of new policy on admission and reexamination
- Actively notifying residents of new policy at times in addition to admission and reexamination.
- Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
- Establishing a protocol for exchange of information with all appropriate TANF agencies
- Other: (list below)

**D. Reserved for Community Service Requirement pursuant to section 12(c) of the U.S. Housing Act of 1937**

**13. PHA Safety and Crime Prevention Measures**

[24 CFR Part 903.7 9 (m)]

Exemptions from Component 13: High performing and small PHAs not participating in PHDEP and Section 8 Only PHAs may skip to component 15. High Performing and small PHAs that are participating in PHDEP and are submitting a PHDEP Plan with this PHA Plan may skip to sub-component D.

**A. Need for measures to ensure the safety of public housing residents**

1. Describe the need for measures to ensure the safety of public housing residents (select all that apply)

- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- Residents fearful for their safety and/or the safety of their children
- Observed lower-level crime, vandalism and/or graffiti
- People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- Other (describe below)

2. What information or data did the PHA use to determine the need for PHA actions to improve safety of residents (select all that apply).

- Safety and security survey of residents
- Analysis of crime statistics over time for crimes committed "in and around" public housing authority
- Analysis of cost trends over time for repair of vandalism and removal of graffiti
- Resident reports
- PHA employee reports
- Police reports
- Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
- Other (describe below)

3. Which developments are most affected? (list below)

**Broadway, Kalmia, Iris/Hawthorne, Madison, Diagonal Court**

**B. Crime and Drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year**

1. List the crime prevention activities the PHA has undertaken or plans to undertake: (select all that apply)

- Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities
- Crime Prevention Through Environmental Design
- Activities targeted to at-risk youth, adults, or seniors
- Volunteer Resident Patrol/Block Watchers Program
- Other (describe below)

2. Which developments are most affected? (list below)

***Broadway, Kalmia, Iris/Hawthorne, Madison, Diagonal Court***

**C. Coordination between PHA and the police**

1. Describe the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities: (select all that apply)

- Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan
- Police provide crime data to housing authority staff for analysis and action

- Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)
- Police regularly testify in and otherwise support eviction cases
- Police regularly meet with the PHA management and residents
- Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services
- Other activities (list below)

*The HACB has been approved to provide one unit at each of its public housing properties for an officer-in-residence program. The program began with the properties identified as part of our PHDEP/Healthy Communities program, and based on those results, expand or contract. Officers' rent shall be determined based on our actual cost to operate a unit of that size. The HACB currently houses 10 officers and their families.*

2. Which developments are most affected? (list below)

*Broadway, Kalmia, Iris/Hawthorne, Madison, Diagonal Court*

#### **D. Additional information as required by PHDEP/PHDEP Plan**

PHAs eligible for FY 2000 PHDEP funds must provide a PHDEP Plan meeting specified requirements prior to receipt of PHDEP funds.

- Yes  No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?
- Yes  No: Has the PHA included the PHDEP Plan for FY 2003 in this PHA Plan?
- Yes  No: This PHDEP Plan is an Attachment. (Attachment Filename: 2003 PHDEP Plan)

### **14. RESERVED FOR PET POLICY**

[24 CFR Part 903.7 9 (n)]

*Attached*

### **15. Civil Rights Certifications**

[24 CFR Part 903.7 9 (o)]

Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.

### **16. Fiscal Audit**

[24 CFR Part 903.7 9 (p)]

1.  Yes  No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))? If no, skip to component 17.)
2.  Yes  No: Was the most recent fiscal audit submitted to HUD?
3.  Yes  No: Were there any findings as the result of that audit?
4.  Yes  No: If there were any findings, do any remain unresolved?  
If yes, how many unresolved findings remain? \_\_\_\_\_
5.  Yes  No: Have responses to any unresolved findings been submitted to HUD?  
If not, when are they due (state below)?

## **17. PHA Asset Management**

[24 CFR Part 903.7 9 (q)]

Exemptions from component 17: Section 8 Only PHAs are not required to complete this component. High performing and small PHAs are not required to complete this component.

1.  Yes  No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock , including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?
2. What types of asset management activities will the PHA undertake? (select all that apply)
  - Not applicable
  - Private management
  - Development-based accounting
  - Comprehensive stock assessment
  - Other: (list below)  
*20 Year Capital Improvement Plan completed*
3.  Yes  No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

## **18. Other Information**

[24 CFR Part 903.7 9 (r)]

### **A. Resident Advisory Board Recommendations**

1.  Yes  No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?

2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)

Attached at Attachment (File name) Resident comments

Provided below:

***We received comments to have the comment period extended. Some residents stated at the public hearing that they did not receive adequate time to review the Agency Plan.***

***Boulder Housing Partners extended the comment period for three weeks.***

3. In what manner did the PHA address those comments? (select all that apply)

Considered comments, but determined that no changes to the PHA Plan were necessary.

The PHA changed portions of the PHA Plan in response to comments  
List changes below:

Other: (list below)

### **B. Description of Election process for Residents on the PHA Board**

1.  Yes  No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)

2.  Yes  No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.)

### 3. Description of Resident Election Process

a. Nomination of candidates for place on the ballot: (select all that apply)

Candidates were nominated by resident and assisted family organizations

Candidates could be nominated by any adult recipient of PHA assistance

Self-nomination: Candidates registered with the PHA and requested a place on ballot

Other: (describe)

The Housing Authority will send out notification to all lease holders about the board appointment process.

- Each site owned and managed by Boulder Housing Partners elects a resident to serve on the Resident Representative Council (RRC).
- The RRC then elects, from its membership, the President of the RRC.

- The President of the RRC then serves on Boulder Housing Partner’s Board of Commissioners. The Mayor appoints the RRC President for a two year term. The Boulder City Council passed an ordinance in 2002 stating that it will support the appointment of the RRC President to the Board of Commissioners and make this appointment in an expeditious manner.

b. Eligible candidates: (select one)

- Any recipient of PHA assistance
- Any head of household receiving PHA assistance
- Any adult recipient of PHA assistance
- Any adult member of a resident or assisted family organization
- Other (list)

c. Eligible voters: (select all that apply)

- All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
- Representatives of all PHA resident and assisted family organizations
- Other (list)

**C. Statement of Consistency with the Consolidated Plan**

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

1. Consolidated Plan jurisdiction: (provide name here) City of Boulder

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

**D. Other Information Required by HUD**

Use this section to provide any additional information requested by HUD.

## **Attachments**

Use this section to provide any additional attachments referenced in the Plans.

# PHA Plan Table Library

## Component 7 Capital Fund Program Annual Statement Parts I, II, and II

### Annual Statement--Attached Capital Fund Program (CFP) Part I: Summary

Capital Fund Grant Number                      FFY of Grant Approval: 08/2002

Original Annual Statement

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	
2	1406 Operations	
3	1408 Management Improvements	
4	1410 Administration	
5	1411 Audit	
6	1415 Liquidated Damages	
7	1430 Fees and Costs	
8	1440 Site Acquisition	
9	1450 Site Improvement	
10	1460 Dwelling Structures	
11	1465.1 Dwelling Equipment-Nonexpendable	
12	1470 Nondwelling Structures	
13	1475 Nondwelling Equipment	
14	1485 Demolition	
15	1490 Replacement Reserve	
16	1492 Moving to Work Demonstration	
17	1495.1 Relocation Costs	
18	1498 Mod Used for Development	
19	1502 Contingency	
20	<b>Amount of Annual Grant (Sum of lines 2-19)</b>	
21	Amount of line 20 Related to LBP Activities	
22	Amount of line 20 Related to Section 504 Compliance	
23	Amount of line 20 Related to Security	
24	Amount of line 20 Related to Energy Conservation Measures	

**Annual Statement**  
**Capital Fund Program (CFP) Part II: Supporting Table**

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost

**Annual Statement**

**Capital Fund Program (CFP) Part III: Implementation Schedule**

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date) <b>Optional Table for 5-Year</b>	All Funds Expended (Quarter Ending Date)

## Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

Complete one table for each development in which work is planned in the next 5 PHA fiscal years. Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal years. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

<b>Optional 5-Year Action Plan Tables</b>				
<b>Development Number</b>	<b>Development Name (or indicate PHA wide)</b>	<b>Number Vacant Units</b>	<b>% Vacancies in Development</b>	
CO-16-5	ARAPAHOE	-0-	0%	
<b>Description of Needed Physical Improvements or Management Improvements</b>			<b>Estimated Cost</b>	<b>Planned Start Date (HA Fiscal Year)</b>
Replace soffit on 951 building			\$ 1,000	2003
Replace roof on 951 building			\$18,032	2003
Paint fence along Arapahoe			\$ 3,000	2003
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 1,000	2003
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 3,000	2004
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 3,000	2005
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 3,000	2006
Building Exterior			\$28,100	2006
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 3,000	2007
Replace finned tube elements			\$ 8,150	2007

<b>Total estimated cost over next 5 years</b>	<b>\$71,282</b>	
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## Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

Complete one table for each development in which work is planned in the next 5 PHA fiscal years. Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal years. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
CO-16-7	BROADWAY	1	2%	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Site: Repaint exterior			\$75,000	2003
Site: New gutters and downspouts			\$22,000	2003
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 2,000	2003
Dwelling Units: Doors replacement			\$ 9,000	2004
Non-routine vacancy prep. (rehab.)			\$ 8,000	2004
Dwelling Units: Replace Interior Sliding/Folding Doors with more substantial doors			\$ 8,894	2005
Non-routine vacancy prep. (rehab.)			\$ 8,000	2005
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 8,000	2006
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 8,000	2007
Site: Landscaping				

<b>Dwelling Units: Repairs to walls/ceiling and paint-interior</b>	<b>\$ 1,471</b>	<b>2007</b>
	<b>\$161,014</b>	<b>2007</b>
<b>Total estimated cost over next 5 years</b>	<b>\$311,379</b>	

## Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

Complete one table for each development in which work is planned in the next 5 PHA fiscal years. Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal years. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

<b>Optional 5-Year Action Plan Tables</b>				
<b>Development Number</b>	<b>Development Name (or indicate PHA wide)</b>	<b>Number Vacant Units</b>	<b>% Vacancies in Development</b>	
CO-16-6	DIAGONAL CT.	-0-	0%	
<b>Description of Needed Physical Improvements or Management Improvements</b>			<b>Estimated Cost</b>	<b>Planned Start Date (HA Fiscal Year)</b>
Site: Add lighting in parking lot			\$10,000	2003
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 2,000	2003
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 6,000	2004
Dwelling Units: Rehabilitate laundry room			\$ 5,740	2004
Site: Repair & seal patios to prevent water leaking into crawl space			\$18,000	2005
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 6,000	2005
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 6,000	2006
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 6,000	2007
Dwelling Units: Replace domestic water heater			\$ 900	2007
Dwelling Units: Repairs to walls/ceilings and paint interior			\$115,081	2007
<b>Total estimated cost over next 5 years</b>			<b>\$175,721</b>	

**Table Library**

## Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

Complete one table for each development in which work is planned in the next 5 PHA fiscal years. Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal years. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
C0-16-4	IRIS/HAWTHORN	-0-	0%	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Dwelling Units:				
Window Replacement			\$ 6,000	2003
Siding/Paint			-0-	2003
Add light fixture near mailboxes			\$ 2,500	2003
Non-routine vacancy prep. (rehab.)			\$ 2,000	2003
Site: Landscaping			\$ 4,000	2004
Dwelling Units:				
Structural enhancement			\$ 70,000	2004
Non-routine vacancy prep. (rehab.)			\$ 9,000	2004
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 8,000	2005
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 8,000	2006
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 8,000	2007
Total estimated cost over next 5 years			\$117,500	

## Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

Complete one table for each development in which work is planned in the next 5 PHA fiscal years. Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal years. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

<b>Optional 5-Year Action Plan Tables</b>				
<b>Development Number</b>	<b>Development Name (or indicate PHA wide)</b>	<b>Number Vacant Units</b>	<b>% Vacancies in Development</b>	
CO-16-2	KALMIA, MADISON, MANHATTAN, NORTHPORT	2	1.15%	
<b>Description of Needed Physical Improvements or Management Improvements</b>			<b>Estimated Cost</b>	<b>Planned Start Date (HA Fiscal Year)</b>
<b>KALMIA</b>				
Site: South fence replacement			\$ 14,500	2003
Site: Lights over mailboxes/sidewalks			\$ 2,500	2003
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 3,000	2003
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 8,000	2004
Exterior: Partial Replacement of Siding			\$ 8,000	2005
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 8,000	2005
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 8,000	2006
Exterior: Partial Replacement of Siding			\$ 70,000	2006
Dwelling Units: Replace sliding doors and frames			\$ 37,000	2006
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 8,000	2007
Dwelling Units: Replace water heater w/ high efficiency Water heaters			\$ 40,400	2007

<b>Dwelling Units: Repair around windows and caulk</b>	<b>\$ 1,500</b>	<b>2007</b>
<b>MADISON</b>		
<b>Site: Replace/repair/repaint fence along Colorado</b>	<b>\$ 11,000</b>	<b>2003</b>
<b>Site: Lighting in parking lot and driveways</b>	<b>\$ 10,000</b>	<b>2003</b>
<b>Site: Repair siding and paint</b>	<b>-0-</b>	<b>2003</b>
<b>Dwelling Units: Rehab kitchens or baths (1190 bldg.)</b>	<b>\$ 41,221</b>	<b>2003</b>
<b>Dwelling Units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 2,000</b>	<b>2003</b>
<b>Site: Parking lot and concrete walkway renovation</b>	<b>\$ 30,000</b>	<b>2004</b>
<b>Dwelling Units:</b>		
<b>Replacement of siding</b>	<b>\$129,676</b>	<b>2004</b>
<b>Non-routine vacancy prep. (rehab.)</b>	<b>\$ 6,000</b>	<b>2004</b>
<b>Dwelling Units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 6,000</b>	<b>2005</b>
<b>Dwelling Units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 6,000</b>	<b>2006</b>
<b>Dwelling Units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 6,000</b>	<b>2007</b>
<b>Exterior: Steam clean and point bricks</b>	<b>\$113,313</b>	<b>2007</b>
<b>Dwelling Units: replace sliding doors &amp; frames</b>	<b>\$ 17,200</b>	<b>2007</b>
<b>MANHATTAN</b>		
<b>Site: Replace or replace back fence</b>	<b>\$ 2,000</b>	<b>2003</b>
<b>Dwelling units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 3,000</b>	<b>2003</b>

**Table Library**

<b>Site: Parking lot and concrete walkway renovation</b>	<b>\$ 14,200</b>	<b>2004</b>
<b>Dwelling Units: Sand and refinish hardwood floors</b>	<b>\$ 82,000</b>	<b>2004</b>
<b>Dwelling Units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 6,000</b>	<b>2004</b>
<b>Exterior: Replacement of siding</b>	<b>\$156,704</b>	<b>2005</b>
<b>Dwelling Units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 6,000</b>	<b>2005</b>
<b>Dwelling Units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 6,000</b>	<b>2006</b>
<b>Dwelling Units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 6,000</b>	<b>2007</b>
<b>Exterior: Steam clean and point bricks</b>	<b>\$144,000</b>	<b>2007</b>
<b>Dwelling Units: Replace sliding doors and frames</b>	<b>\$ 20,300</b>	<b>2007</b>
<b>NORTHPORT</b>		
<b>Rehab community kitchen</b>	<b>\$ 9,000</b>	<b>2003</b>
<b>Replace boilers</b>	<b>\$ 30,000</b>	<b>2003</b>
<b>Dwelling Units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 2,000</b>	<b>2003</b>
<b>Dwelling Units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 10,000</b>	<b>2004</b>
<b>Dwelling Units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 11,000</b>	<b>2005</b>
<b>Dwelling Units: Non-routine vacancy prep. (rehab.)</b>	<b>\$ 11,000</b>	<b>2006</b>
<b>Exterior: Repair exterior siding (south bldg.)</b>	<b>\$ 4,450</b>	<b>2006</b>
<b>Site: Replace dumpster enclosure with concrete enclosure</b>	<b>\$ 7,000</b>	<b>2006</b>

**Table Library**

<b>Dwelling Units: Non-routine vacancy prep. (rehab)</b>	<b>\$ 11,000</b>	<b>2007</b>
<b>Total estimated cost over next 5 years</b>	<b>\$1,128,964</b>	

## Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

Complete one table for each development in which work is planned in the next 5 PHA fiscal years. Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal years. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
CO-16-3	WALNUT PL.	1	1.05%	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Dwelling units: Replace boilers			\$100,000	2003
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 3,000	2003
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 12,000	2004
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 6,000	2005
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 6,000	2006
Dwelling Units: Replace closet and bathroom doors			\$ 80,032	2006
Minor repairs to walls and ceilings			\$145,131	2006
Dwelling Units: Non-routine vacancy prep. (rehab.)			\$ 6,000	2007
<b>Total estimated cost over next 5 years</b>			<b>\$358,163</b>	

## Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

Complete one table for each development in which work is planned in the next 5 PHA fiscal years. Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal years. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

<b>Optional 5-Year Action Plan Tables</b>			
<b>Development Number</b>	<b>Development Name (or indicate PHA wide)</b>	<b>Number Vacant Units</b>	<b>% Vacancies in Development</b>
	<b>PHA Wide</b>	<b>N/A</b>	<b>N/A</b>
<b>Description of Needed Physical Improvements or Management Improvements</b>		<b>Estimated Cost</b>	<b>Planned Start Date (HA Fiscal Year)</b>
<b>Dwelling units: Replace sliding glass doors</b>		<b>\$ 10,000</b>	<b>2003</b>
<b>Dwelling Units: Re-finish/install oak floors</b>		<b>\$ -0-</b>	<b>2003</b>
<b>Dwelling Units: Replace cabinets</b>		<b>\$ 20,000</b>	<b>2003</b>
<b>Dwelling Units: Replace sliding glass doors</b>		<b>\$ 10,000</b>	<b>2004</b>
<b>Dwelling Units: Replace cabinets</b>		<b>\$ 20,000</b>	<b>2004</b>
<b>Dwelling Units: Non-routine PM repairs</b>		<b>\$ 20,000</b>	<b>2004</b>
<b>Site: Landscaping upgrade/repairs</b>		<b>\$ 5,000</b>	<b>2004</b>
<b>Dwelling Units: Non-routine PM repairs</b>		<b>\$ 20,000</b>	<b>2005</b>
<b>Dwelling Units: Replace sliding glass doors</b>		<b>\$ 10,000</b>	<b>2005</b>
<b>Dwelling Units: Non-routine PM repairs</b>		<b>\$ 20,000</b>	<b>2006</b>
<b>Site: Landscaping upgrade/repairs</b>		<b>\$ 5,000</b>	<b>2006</b>

<b>Dwelling Units: Non-routine PM repairs</b>	<b>\$ 20,000</b>	<b>2007</b>
<b>Site: Landscaping upgrade/repairs</b>	<b>\$ 5,000</b>	<b>2007</b>
<b>Total estimated cost over next 5 years</b>	<b>\$165,000</b>	



# **Pet Policy for the Housing Authority of the City of Boulder**

## **I. SELECTION CRITERIA**

### **A. Approval**

Pets are permitted in elderly/disabled housing and in public housing.<sup>1</sup> The pet owner understands that he/she must follow the Pet Policy guidelines listed below as established by the Housing Authority.

Prior to accepting a pet for residency at the housing site (exception made for auxiliary aid/service animals), the resident must provide to the property manager or the resident manager proof of the pet's good health and suitability as outlined in "Basic Guidelines" listed below. Proof of the animal's (cat or dog) licensing and vaccination record must be presented on an annual basis. Proof of spaying or neutering (for cat or dog) is also required.

### **B. Basic Guidelines**

1. The following types of common household pets will be permitted under the following criteria:
  - a. Dogs
    - (1) Maximum number—one
    - (2) Maximum weight—20 pounds (does not apply to animals that assist the disabled)
    - (3) Must be housebroken
    - (4) Must be licensed with the city of Boulder
    - (5) Must have proof of spay or neuter
    - (6) Must have proof of all required vaccinations
    - (7) The following breeds are not permitted:  
Rottweilers, Pit bulls, Doberman Pinsers including miniatures, German Shepards.

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<sup>1</sup> Elderly/Disabled Sites: Canyon Pointe; Walnut Place; Northport; Arapahoe; and portions of Kalmia, Madison, and Manhattan

- b. Cats
    - (1) Maximum number—one
    - (2) Must have proof of spay or neuter
    - (3) Must have proof of all required vaccinations
    - (4) Must be trained to the litter box
  - c. Birds
    - (1) Maximum number—two
    - (2) Must be maintained inside of cage at all times
2. No other types of pets may be kept by tenants on the premises of this project without prior written permission of landlord. Small caged animals such as rodents are excepted.
  3. No more than one dog **or** cat permitted in a unit.

## II. NON-REFUNDABLE DAMAGE FEES AND PET DEPOSITS

- A. *The total cost for having a pet is \$300. This cost is comprised of the following:*
  1. A non-refundable damage fee of \$50 will be charged for ownership of a cat or a dog; and (This does not apply to auxiliary aid or service animals.)
  2. A pet deposit of \$250 is required for all dogs and cats (this does not apply to auxiliary aid or service animals). Management reserves the right to change this deposit amount consistent with federal guidelines at any time.
    - a. Resident's liability for damages caused by their pet is not limited to the amount of the pet deposit. Resident will be required to reimburse the Housing Authority for the actual cost of any and all damages caused by their pet.
    - b. Pet owner is responsible for all expenses incurred should an infestation in their unit and/or adjacent units or common areas be present which is attributable to his/her pet.  
  
Resident will be charged for actual expenses incurred to eliminate offensive pet odors.
    - c. Individuals with disabilities who have approved auxiliary aid or service animal must comply with the HACB Pet

Policy, except when noted, and assumes responsibility for any damages incurred by their animal.

3. A pet deposit of \$250 must be paid upon admission to a property (except for auxiliary aid or service animals). A \$50 minimum down payment and up to four payments of \$50 per month thereafter until the balance is paid.
4. The non-refundable damage fee will be due and payable prior to the resident bringing home a pet. (Does not apply for auxiliary aid or service animals.) The HACB requires that this fee be paid in full. No repayment agreements will be negotiated regarding this fee.

### III. PET RULES

#### A. Dogs and Cats

1. Dogs and cats shall be maintained within the resident pet owner's unit. When outside, the pet shall be kept on a leash and under the control of the resident at all times. Under no circumstances shall any cat or dog be permitted to roam free in any common area (includes both buildings and grounds). No resident shall be allowed to walk his/her pet through common areas during times of parties, potlucks, or other social gatherings.
2. All animal waste or litter from cat litter boxes shall be picked up immediately by the pet owner and disposed of in sealed plastic trash bags and placed in trash bins. Residents shall be responsible for mitigating any pet odors and disposal of pet waste.  
  
Cat litter shall not be disposed of by flushing down toilets. Charges for unclogging toilets or clean-up of common areas required and attributable to pet nuisance shall be billed to and paid by the resident pet owner.
3. Resident pet owners agree to be responsible for immediately cleaning up any dirt tracked through the common area lobby or hallways by their pet.
4. Pet owners shall keep their pets under control at all times. Pet owners shall assume sole responsibility for liability arising from any injury sustained by any person attributable to their pet and agree to hold the owner and management harmless in such proceedings.

5. Resident pet owners agree to control the noise of their pet such that it does not constitute a nuisance to other tenants. Failure to control pet noise can result in the removal of the pet from the premises and/or eviction of the resident.

Management reserves the right to determine if a pet must be immediately and permanently removed from the premises due to aggressive behavior which causes threat or bodily injury to any tenant, guest, or staff member.

6. No pet shall be left unattended in any unit for longer than 12 hours.
7. All resident pet owners shall provide adequate care, nutrition, exercise, and medical attention for their pet. Pets which appear to be poorly cared for or which are left unattended for longer than 12 hours will be reported to the humane society or other appropriate authority and will be removed from the premises at the pet owner's expense.
8. In the event of a resident's sudden illness, the resident pet owner agrees that management shall use discretion with respect to the provision of care for the pet. These provisions will be consistent with federal guidelines unless written instructions by the resident with respect to this area are provided to the project office in advance. All expenses relating to the care of the pet will be the responsibility of the resident.
9. In the event of the death of a resident, the resident pet owner agrees that management shall have discretion to determine appropriate provision of care of the pet consistent with federal guidelines unless written instructions with respect to accommodation are provided in advance by the resident to the Housing Authority.
10. Unwillingness on the part of named caretakers of a pet per items #8 and #9 of this section to assume custody of the pet shall relieve the Housing Authority of any requirement to adhere to any written instructions with respect to the care or disposal of a pet and shall be considered as authorization to management to exercise discretion in such regard consistent with federal guidelines.
11. Resident pet owners acknowledge that other residents may have chemical sensitivities or allergies related to pets or are easily frightened by such animals. The resident, therefore, agrees to

exercise common sense and common courtesy with respect to other resident's right to peaceful and quiet enjoyment of the premises.

12. Management reserves the right to require the removal of a pet from the premises on a temporary or permanent basis for the following causes:
  - a. Creation of a nuisance after proper notification.
  - b. Excessive pet noise or odor with proper notification.
  - c. Unruly or dangerous behavior
  - d. Excessive damage to the resident's apartment unit and/or housing common areas.
  - e. Repeated problems with vermin or flea infestation.
  - f. Failure of the resident to provide adequate and appropriate vaccination of the pet.
  - g. Leaving a pet unattended for more than 12 hours.
  - h. Failure of the resident to provide adequate care of their pet.
  - i. Resident death and/or serious illness.
  - j. Failure to observe any other rule contained in this section and not here listed, upon proper notification.
13. Visitors with pets are strictly prohibited. (Exception to this rule is made for animals that assist the disabled.)

B. Birds

1. Must be kept caged at all times.
2. Waste must be disposed of in sealed plastic trash bag and placed in trash bin.
3. Excessive noise is not permitted.

**PET POLICY AFFIDAVIT**

“I have read and understand the above pet policies of the Housing Authority of the city of Boulder and agree to comply fully with their provisions. I understand that failure to comply may constitute reason for removal of my pet. Where required by management to remove my pet from the premises, I agree to affect such removal and understand that my failure to do so shall constitute grounds for eviction.”

The Pet Policy and Affidavit become part of the lease.

Resident Name: \_\_\_\_\_

Date: \_\_\_\_\_

Housing Site Name and Unit #: \_\_\_\_\_

Pet deposit of \$250 will be paid by: \_\_\_\_\_

**THE FOLLOWING PERSON IS AUTHORIZED TO CARE AND/OR REMOVE MY PET FROM MY UNIT IN THE EVENT OF AN EMERGENCY:**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

I have read or have had explained to me the Pet Policy and understand and agree to abide by all of the rules as indicated in the policy.

Resident’s Name: \_\_\_\_\_

Resident’s Signature: \_\_\_\_\_

Date: \_\_\_\_\_

The above named resident has read and signed these rules in my presence:

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**PET INFORMATION CARD  
TELEPHONE NUMBER**

RESIDENT'S NAME: \_\_\_\_\_

UNIT NUMBER: \_\_\_\_\_

PET'S NAME: \_\_\_\_\_

PET'S AGE: \_\_\_\_\_

DESCRIPTION: \_\_\_\_\_

VET'S NAME: \_\_\_\_\_

PHONE: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

HOW LONG HAVE YOU HAD THIS PET? \_\_\_\_\_

LICENSE NUMBER: \_\_\_\_\_

DATE AND EVIDENCE OF:

TYPE: \_\_\_\_\_ WEIGHT: \_\_\_\_\_ CERT OF GOOD HEALTH: \_\_\_\_\_

RABIES: \_\_\_\_\_ DISTEMPER: \_\_\_\_\_ SPAYED/NEUTERED: \_\_\_\_\_

## Voluntary Conversion of Boulder Housing Partners Public Housing—Initial Assessment

<b>Property</b>	<b>Status of Assessment</b>	<b>Expense</b>	<b>Resident Benefit</b>	<b>Community Impact</b>	<b>Recommendation</b>
Arapahoe	Complete	Due to rental market, conversion would cost the agency more in monthly HAP expenses than it costs us to operate public housing. Average monthly HAP expense is \$545 vs. an expected average monthly operating expense of \$381 for a public housing unit in 2002.	Conversion may benefit some residents but not others. Depends on skill level of residents.	Loss of permanently affordable units for persons and families earning less than 30% of AMI, additional strain on rental market, difficulty leasing with Section 8 assistance.	Disabled elderly housing—not recommended
Broadway	Complete	Same—more expensive to convert	More than 62% of residents of Hispanic ethnicity with pro-rated assistance, families would have difficulty leasing units of equal quality in the community.	Loss of permanently affordable units for persons and families earning less than 30% of AMI, additional strain on rental market, difficulty leasing with Section 8 assistance.	Conversion not recommended due to cost and impact on residents
Diagonal Court	Complete	Same—more expensive to convert	More than 52% of residents of Hispanic ethnicity with pro-rated assistance, families would have difficulty leasing units of equal quality in the community.	Loss of permanently affordable units for persons and families earning less than 30% of AMI, additional strain on rental market, difficulty leasing with Section 8 assistance.	Conversion not recommended due to cost and impact on residents
Iris/Hawthorne	Complete	Same—more expensive to convert	More than 62% of residents of Hispanic ethnicity with pro-rated assistance, families would have difficulty leasing units of equal quality in the community.	Loss of permanently affordable units for persons and families earning less than 30% of AMI, additional strain on rental market, difficulty leasing with Section 8 assistance.	Conversion not recommended due to cost and impact on residents
Kalmia	Complete	Same—more expensive to convert	More than 60% of residents of Hispanic ethnicity with	Loss of permanently affordable units for persons	Conversion not recommended due to cost

			pro-rated assistance, families would have difficulty leasing units of equal quality in the community.	and families earning less than 30% of AMI, additional strain on rental market, difficulty leasing with Section 8 assistance.	and impact on residents
Madison	Complete	Same—more expensive to convert	More than 52% of residents of Hispanic ethnicity with pro-rated assistance, families would have difficulty leasing units of equal quality in the community.	Loss of permanently affordable units for persons and families earning less than 30% of AMI, additional strain on rental market, difficulty leasing with Section 8 assistance.	Conversion not recommended due to cost and impact on residents
Manhattan	Complete	Same—more expensive to convert	More than 41% of residents of Hispanic ethnicity with pro-rated assistance, families would have difficulty leasing units of equal quality in the community.	Loss of permanently affordable units for persons and families earning less than 30% of AMI, additional strain on rental market, difficulty leasing with Section 8 assistance.	Conversion not recommended due to cost and impact on residents
Northport	Complete	Same—more expensive to convert	Difficult for elderly residents to move, central Boulder location next to hospital, not many units of equal quality available in same location.	Loss of permanently affordable units for persons and families earning less than 30% of AMI, additional strain on rental market, difficulty leasing with Section 8 assistance.	Elderly/disabled housing—conversion not recommended
Walnut Place	Complete	Same—more expensive to convert	Difficult for elderly residents to move, community already established, safe building w/ good location in central Boulder.	Loss of permanently affordable units for persons and families earning less than 30% of AMI, additional strain on rental market, difficulty leasing with Section 8 assistance.	Elderly housing—conversion not recommended
Glen Willow	N/A—Project based Sect 8				
Canyon Pointe	N/A—Project based Sect 8				
North Haven	N/A—Project based Sect 8				

**BOULDER HOUSING PARTNERS**

**ADMISSIONS AND CONTINUED OCCUPANCY PLAN**

**FOR THE**

**PUBLIC HOUSING PROGRAM**

**Board Approved: June 1, 1998**  
**Revised and Approved: March 1, 1999**  
**Revised July 1999**  
**Board Approved: September 27, 1999**  
**Revised July 2000**  
**Board Approved: August 1, 2000**  
**Revised July 2001**  
**Board Approved: July 30, 2001**  
**Revised October 2002**  
**Board Approved November 4, 2002**

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## **PURPOSE**

This document is established to set the Administrative Policies for the Public Housing Program of Boulder Housing Partners (BHP). The purpose of the document is to establish policies for providing housing in a manner that is consistent with the Department of Housing and Urban Development (HUD) requirements but which are not a mere restatement of HUD-mandated policies and procedures.

This policy covers both admissions and continued occupancy for Boulder Housing Partners Public Housing properties. These properties are Arapahoe, Broadway, Diagonal Court, Iris/Hawthorne, Kalmia, Madison, Manhattan, Northport, and Walnut Place. Changes in the plan will be approved by the BHP's Board of Commissioners and submitted to HUD.

BHP is responsible for complying with all changes in HUD regulations pertaining to BHP's Public Housing properties. If such changes conflict with this Administrative Policy, HUD regulations will have precedence.

## **NONDISCRIMINATION/504 POLICY**

Boulder Housing Partners will conduct the admissions and continued occupancy processes in a manner in which all persons interested in admissions to Public Housing are treated fairly and consistently.

BHP will not discriminate because of race, color, national origin, religion, sex, age, handicap, or familial status. BHP is bound by the nondiscrimination requirements of Federal, State, and local law. We will abide by the nondiscrimination requirements of:

- A. Title VI of the Civil Rights Act of 1964**, which prohibits discrimination based on race, color, creed, sex, religion, national origin, familial status or disability in programs receiving Federal financial assistance;
- B. Section 504 of the Rehabilitation Act of 1973**, which prohibits discrimination based on handicap in programs receiving Federal financial assistance.
- C. The Age Discrimination Act of 1975**, which prohibits discrimination based on age in programs receiving Federal financial assistance; and
- D. Executive Order 11063**, which requires HUD to take whatever action is necessary to prohibit discrimination based on race, color, national origin, religion (creed), or sex in housing receiving Federal financial assistance.
- E. Fair Housing Amendments Act of 1988**, which prohibits security deposits that are based on age or handicap except in cases with elderly persons where such practices will not discriminate against families with children. A tenant must obtain the landlord's permission to modify a dwelling and the landlord may withhold permission until a responsible contractor is obtained. There can be no discrimination against families. The rule permits landlords to reject handicapped persons as tenants if they pose a social risk but not on the grounds of their handicap.

## **SPECIAL ASSISTANCE**

It is the policy of Boulder Housing Partners to provide assistance to all its clients and residents allowing equal dissemination of all information relating to its programs and activities. Upon request, communicative services are available to all individuals with special needs.

For assistance or information, individuals who are deaf or hearing impaired may contact BHP during normal business hours by calling the TDD phone number, **(303) 441-3150**, which is located in the Administration Office.

In the event of an after-business hours emergency, BHP residents who are TDD/TTY users may contact **Colorado Relay Service** which is a communication service provided free of charge. By dialing **1-800-659-2656**, TDD/TTY users may contact their Resident Manager, Assistant Resident Manager, or Maintenance Department via a trained TDD/TTY operator who will relay messages to and from the party which is being contacted.

If staff personnel are unable to communicate information relating to the programs or activities offered by BHP or meet the needs of a client or resident, alternative communicative resources can be requested. All BHP policies, forms, lease agreements, house rules etc. are available in large print upon request. If requested via BHP's reasonable accommodation policy, information relating to policies and activities of BHP can be tape recorded or transcribed in Braille.

## **PRIVACY RIGHTS**

Applicants and participants will be required to sign the Federal Privacy Act and HUD Authorization for Release of Information, Form 9886, in conjunction with the HUD 50058 form which states under what conditions HUD will release tenant and owner information. BHP's policy regarding release of information is in accordance with these documents.

All information provided to BHP by an applicant or resident is confidential. Requests for information must be accompanied by a written release request in order for BHP to release any information involving an applicant or participant, unless disclosure is authorized under Federal or State law.

## **REASONABLE ACCOMMODATION POLICY AND PROCEDURES**

### **A. POLICY**

BHP complies with the Department of Housing and Urban Developments (HUD) regulations implementing Section 504 (24 CFR Part 8, dated June 2, 1988). Any resident with a disability has an opportunity to request a reasonable accommodation which will ensure the resident's full use and enjoyment of their unit and allow equal opportunity to participate in, and enjoy the benefits of, a program or activity receiving Federal financial assistance. BHP will review each reasonable accommodation request on a case by case basis. BHP however, is not required to take any action that would result in a fundamental alteration in the nature of a program or activity or in undue financial and administrative burdens. Forms for reasonable accommodations may be obtained from BHP Management Office. BHP reserves the right to verify any claimed disability.

### **B. GUIDING PRINCIPLES**

1. The person requesting the reasonable accommodation is usually an expert in regard to his or her own disability and the accommodations that may be appropriate. Generally, BHP presumes that the information the person provides concerning his or her own needs is accurate and the method proposed for accommodating those needs is the most appropriate.
2. This procedure for evaluation and responding to requests for a reasonable accommodation relies on a cooperative relationship between BHP and the applicant/resident. The process is not adversarial.
3. The form "Request for Reasonable Accommodation" is designed to help BHP staff and applicants/residents. If an applicant/resident cannot complete the form due to his/her disability, BHP will still respond to the request for an accommodation.
4. If the accommodation is reasonable (see procedure 3 below), BHP will grant the accommodation.
5. When the reasonable accommodation is requested by an applicant in order to overcome information that disqualifies the applicant from participating in BHP's housing policy, or by a resident in order to overcome a lease violation, BHP will utilize the Tenant Assistance Program Model. (Attachment A)

If the accommodation is reasonable and produces a reasonable expectation of success, BHP will grant the request.

6. Reasonable accommodations will be focused on the individual and designed to address each person's situation.
7. Communications under this policy will be in plain language, in a format appropriate to meet the communication needs of the person with disabilities.
8. If a tenant needs a physical modification to a unit as a reasonable accommodation, BHP will normally pay for the modification unless it causes an undue financial and administrative burden.

**C. PROCEDURE 1—Communication with Applicants and Residents**

1. All applicants will be provided information regarding the reasonable accommodation policy of BHP at the time of application.
2. All residents will be provided information regarding the reasonable accommodation policy of BHP at the time of recertification, upon notice of a lease violation, and upon request.
3. All decisions to grant or to deny reasonable accommodations will be communicated in writing and in the form requested by the individual.

**D. PROCEDURE 2—Sequence for Making Decisions**

1. Is the applicant/resident a qualified person with a disability?
  - a. If NO, BHP is not obliged to make a reasonable accommodation and may deny the request.
  - b. If YES, go to step 2.
  - c. If more information is needed, BHP will request additional information either in writing or through a request for a meeting.
2. Is the requested accommodation related to the disability?  
If necessary, request information with a written request for information letter.

3. Is the requested accommodation reasonable? BHP will make this determination by following Policy 3—Guidelines for Determining Reasonableness.
  - a. If YES, BHP will approve the request for reasonable accommodation. A written description of the accommodation will be prepared and included in the approval letter.
  - b. If NO, BHP may deny the request. Denial will be made in writing.
  - c. If more information is needed, BHP will either write for more information or request a meeting.

**E. PROCEDURE 3—Guidelines for Determining Reasonableness**

1. In accordance with Principle #1, in most instances BHP will accept the judgement of the person with a disability that an accommodation is needed. However, BHP retains the option to require the person with disabilities to verify the need for an accommodation to enable him/her to access and use the housing program. Verifying documentation must be current within sixty days, must verify the need for the accommodation and explain how the accommodation will satisfy the stated disability. Verification provided by any certified practitioner familiar with the resident's disability will be accepted.
2. In accordance with principle #1, in most instances BHP will accept the judgement of the person with disabilities that the requested accommodation is the most appropriate for him or her. However, BHP retains the option to investigate equally effective alternatives to the requested accommodation, and/or alternative methods of providing the requested accommodation.
3. If a number of potential accommodations would clearly satisfy the needs of the person with disabilities, BHP retains the option to select the accommodation that is most convenient and cost-effective for the organization. This includes the option to select a change in procedure or policy, rather than to make a structural change, when the procedure change would be equally effective.

The following steps refer to requested accommodations which are needed, and which represent the most appropriate means of accommodating the disability:

4. Does the requested accommodation constitute a fundamental alteration. If so, BHP will deny the request.
5. Does the requested accommodation create undue financial and administrative burdens for BHP? If so, BHP will comply with the request only up to the extent that we can do so without creating undue burdens. BHP reserves the right to have outside counsel assist in the determination of administrative or financial burden.

**I. ELIGIBILITY FOR ADMISSION**

To be eligible for admission an applicant must meet the following conditions:

**FAMILY:**

- A. A "family" may be a single person or a group of persons.
- B. A "family" may or may not include children.
- C. A group of persons consisting of two or more elderly persons or disabled persons living together, or one or more elderly or disabled persons living with one or more live-in aides is a family.

**ELDERLY FAMILY:**

A family whose head of household or spouse:

- A. at least 62 years old; **or**
- B. handicapped; **or**
- C. disabled.

**Handicapped Person:**

A person who has a physical or mental impairment which is expected to be of long-continued duration; which substantially impedes his/her ability to live independently, and is of such nature that the disability could be improved by suitable housing conditions. (Section 3(b)(3), United States Housing act of 1937, as amended: Lower-Income Public Housing; and section 8, U.S. Housing Act of 1937, Housing Assistance Payments Program).

**Disabled Person:**

A person disabled within the meaning of Section 223 of the Social Security Act or Section 102(b)(5) of the Development Disabilities Services and Facilities Construction Amendments of 1970. As stated in Section 223 of the Social

Security Act or 102(b) (5) of the Developmental Disabilities; Inability to engage in any substantial, gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period

### **CONTINUALLY ASSISTED FAMILIES**

It is the policy of BHP to remove a family's application from all waiting lists once the family has received housing assistance through the Housing Authority. Upon lease signing or upon HAP Contract execution for the Section 8 program, an applicant will be removed from all other waiting lists. Families that want to remain on a different waiting list may do so, but the family must inform BHP at the time of lease signing. Preference will be granted and families will be given the opportunity to transfer assistance when and after (Refer to Transfer Policy—Section VIII):

- A. The family's application gets to the top of the waiting list; and
- B. The family satisfies any and all debt to Boulder Housing Partners or files a written request for an informal hearing regarding any outstanding debt, follows through the informal hearing review and satisfies any requirements made by the informal or legal hearing; and
- C. There is a suitable size unit or subsidy available for transfer.
- D. The family has been in the first program for 12 months.

If a family transfers to another unit, transfers to the Section 8 program, or moves out, the family must relinquish the current unit to BHP. Remaining family members who were not a part of the original lease and who have been a part of the household for less than one year, may not remain in the unit. The lease may not be transferred to a remaining family member who meets the above definition.

### **ELIGIBLE IMMIGRATION STATUS**

In order for an applicant to be eligible to receive housing assistance, at least one family member must be a United States citizen, national, or a certain category of eligible non-citizens. Once an applicant reaches the top of the waiting list, the initial screening of the applicant and his/her family will include declaration or verification of citizenship or eligible immigration status. Eligible immigration status categories are available in the July 26, 1995 Non Citizen Rule Federal Register. Documentation to prove citizenship consists of the following: 1) a signed declaration of eligible immigration status; 2)

applicable Immigration and Naturalization Service (INS) documents; and 3) a signed verification consent form.

To qualify under this requirement, an applicant must declare citizenship or submit evidence of citizenship or eligible immigration status to Boulder Housing Partners once the applicant reaches the top of the waiting list. If an applicant family does not declare citizenship, provide proof of eligible immigration status, or be in the process of receiving eligible status for at least one family member, housing assistance will be denied to that applicant. If there are members of the family who do not contend to be citizens or have eligible immigration status, then that family's housing assistance payment will be pro-rated.

At any time in the future that the family composition changes, proof of citizenship or eligible immigration status must be provided for that individual to be added to the lease and subsidized. (See rent calculation chapter for pro-rated rent calculation instructions.)

**ADMISSION RESTRICTIONS INCLUDE DENIAL OF PARTICIPATION FOR:**

- A. Failing to repay previous debt to BHP or any other housing agency.
- B. Committing fraud in connection with any HUD program, or failing to disclose previously committed fraud in connection with any HUD program.
- C. Providing false information on the application.
- D. Unsuitability. Taking into consideration past performance such as previous eviction for non-payment of rent, breach of lease or use of assisted unit for illegal purposes.
- E. A history of criminality. History of criminality or other acts which will adversely affect the health, safety or welfare of other residents.
- F. Applicant non-cooperation. Refusing or failing to complete required forms or to supply requested information.
- G. Applicants who appear on HUD's List of Suspensions, Debarments, and Limited Denials of Participation.

- H. Any applicant arrested or convicted for pedophilia at any time in his/her life will be denied admission.
- I. Any applicant or family member who is required to register as a sex offender will be denied admission. This includes lease additions of family members. Children under the age of 18 who are registered sex offenders will not be permitted to live in properties owned by BHP.

**INCOME FOR ADMISSION**

- A. Annual gross income cannot exceed the applicable Area Median Income (AMI) limits as published by HUD at the time of admission.

Applicable income limits are posted and available upon request.

- B. Definitions:

Extremely Low Income Limit: 30 % of AMI  
 Very-Low Income Limit: 50% of AMI  
 Low-Income Limit: 80% of AMI

- C. Applicants otherwise eligible must have annual income below the current HUD published income limits. Public housing sites may accept applicants earning up to 80% of Area Median Income.

<b><u>Housing Site</u></b>	<b><u>Average Median Income Limit (%)</u></b>
Public Housing	
Arapahoe	80%
Broadway	80%
Diagonal	80%
Kalmia	80%
Manhattan	80%
Madison	80%
Northport	80%
Iris/Hawthorne	80%
Walnut Place	80%

D. Income Targeting

BHP will administer the Public Housing program so that 40% of new admissions to the program earn less than the extremely low income limit (30% of AMI). BHP will determine the number of admissions at less than 30% of AMI based on the number of admissions from the previous calendar year. This number will be determined annually in January.

**ADDITIONAL ADMISSION CRITERIA FOR NORTHPORT AND WALNUT PLACE**

A. Northport: Eligible applicants must be 62 years or older or disabled.

B. Walnut Place: Eligible applicants must be 50 years or older. Applicants who are between 50 and 61 years who are disabled will be provided a priority over applicants who are between 50 and 61 years and not disabled. All tenants placed at the Walnut Place Apartments must be 50 years or older due to the building's designation as Elderly Only. (Designation applicable September 1997 through September 2002, and extended until September 2004.)

**II. MANAGING THE WAITING LIST**

**A. Order of Applicants on the Waiting List:**

1. Local Preferences

a. Residency Preference

Applicants who are residents or work in the city of Boulder receive priority on the waiting list. To be eligible for this preference by working, an applicant must be regularly employed in the city of Boulder. To qualify for living in the city of Boulder, an applicant must be able to document residency in the city of Boulder. Students receiving work study income are not considered employed for this priority.

b. Singles Preference

A single person who is elderly (62 years of age), disabled or displaced will be admitted before other single person(s).

2. All other things being equal, applicants will be placed on the waiting list by date and time of application.
3. Points will be awarded on the waiting list in the following manner. Those applicants with the most points will reach the top of the waiting list first:
  - a. 50 pts—families, elderly, disabled, or persons displaced by a natural disaster as defined by the Federal Emergency Management Agency who live or work in the City of Boulder.
  - b. 40 pts—elderly or disabled individuals who do not live or work in the city of Boulder.
  - c. 30 pts—families who do not live or work in the City of Boulder
  - d. 20 pts—single persons (not elderly, disabled, or displaced) who live or work in the City of Boulder
  - e. 10 pts—single persons (not elderly, disabled, or displaced) who do not live or work in the City of Boulder.
4. Current residents who need to transfer to another unit within the owned and managed portfolio due to family composition or reasonable accommodation will be given priority over applicants on the waiting list.

B. Special Admissions—Non Waiting List

BHP has memorandums of understandings or contracts with the following service agencies in Boulder County for the provision of housing to targeted populations in need: Boulder County SafeHouse, Boulder County Project Self-Sufficiency, Center for People with Disabilities, and the Community Outreach Effort (CORE). (CORE participants are Boulder County Mental Health Center, Boulder County Social Services, Center for People with Disabilities, and Emergency Family Assistance.) BHP accepts limited referrals from these agencies for apartments within its Public Housing program in order to facilitate housing accessibility to families who require the support of social service agencies.

- C. To the extent possible due to availability, BHP will provide housing to those families or individuals who have been displaced due to a natural disaster in an area declared a Federal disaster area.

- D. Within the public housing program, applicants will be selected on the basis outlined in Section 1 - Eligibility For Admission. Elderly and disabled persons will be selected for units designed and/or designated for their use.
- E. BHP maintains separate waiting lists for Canyon Pointe, Glen Willow, and North Haven due to separate funding sources.
- F. Qualification and Verification
  - 1. No information recorded on an application is verified until a unit will be available within 60 days. BHP takes, at face value, family certification, and places them on the waiting list according to the information provided on their application.
  - 2. Before the family is provided assistance, the family's eligibility will be verified.
- G. Deconcentration of Income and Ethnicity Policy

Consistent with the regulations described by HUD, BHP tracks income and ethnicity concentrations at its housing sites. Updates are completed twice annually. The objectives are to assure that each of BHP's housing sites include families that are generally representative of the range of income of low income families in the City of Boulder and also that there is not a concentration of ethnicity at any one particular housing site. The goal of BHP is to meet the objectives and provisions of the Broad Range of Income Policy while following the waiting list ranking mechanisms established by the Housing Authority. (Deconcentration and Ethnicity spreadsheets and targets are available at BHP upon request.)

### **III. APPLYING FOR ADMISSION**

- A. How to Apply for Housing
  - 1. Any person requesting an application for housing assistance will be provided the opportunity to fill out an application as long as the waiting

list is open. If the waiting list is open, applications may be mailed or made in person at the main office of BHP.

2. The application will be reviewed for completeness, dated, time-stamped, and initialed by staff as to the time the application is received.
3. Individuals who have a disability that would prevent them from making application may contact BHP to make special arrangements to complete their application.
4. The applicant is responsible for updating BHP with any change of address or change in family composition within ten days. Failure to do so may result in applicant's removal from the waiting list.

B. Notification of Applicant Status

1. Each applicant will be notified either verbally or in writing when his or her application has been received and placed on the waiting list.
2. Each applicant determined to be ineligible shall be promptly notified by BHP in writing of the reasons for the determination. This notice shall state his/her right, upon request within a reasonable time, to an informal review. For this purpose BHP may use a form letter, filling in appropriate information described in the preceding sentence. The following describes the procedures for Applicant Denial and the Informal Review Process.

a. Applicant Denial Procedure

- Eligibility Coordinator makes initial determination regarding eligibility of an applicant.
- If the eligibility is clear-cut--either clearly eligible or clearly not eligible--Eligibility Coordinator will make final decision regarding eligibility.
- If the eligibility is not clear cut, the Eligibility Coordinator will assemble two other persons as the "Applicant Review Team" to review the file and assist in making the eligibility decision. The two other reviewers will be somehow related either to the property, program, or the resident manager function. This will be conducted in an informal manner--either by phone call or by

impromptu meeting. Reviewers could be from occupancy staff, maintenance staff, or Healthy Communities staff.

- A decision will be made by group consensus or by majority vote if consensus is not possible.

b. Informal Review Procedure

- If an applicant is denied and requests an informal review, the Director of Housing Services will organize an Informal Review Team to hear the applicant's case. This will be a more formal meeting with a set date and time of the meeting.
- The Informal Review Team must be comprised of three persons who were not involved in the original decision to deny the applicant. The Director of Housing Services will select two persons associated with the program or property in question but not involved with original decision.
- A decision regarding the informal review will be made by group consensus or by majority vote if consensus is not possible.

3. BHP's communication with the applicant will in no way lead applicants to believe that the estimated date of housing assistance availability is exact. All communication will stress that the estimated date of housing assistance availability is subject to factors that are beyond BHP's control such as turnover, additional funding etc. . .

C. Final Determination and Notification of Eligibility

1. Applicants on the waiting list will be requested to fill out a personal declaration form when BHP estimates that housing assistance will be available in 60 days. This form will be completed in the applicant's handwriting whenever possible.
2. It is the responsibility of the applicant to provide documentation to verify the information placed on the original application.
3. An applicant's misrepresentation of any information on the application will be sufficient reason for denial of admission.

D. Removal from Waiting List and Purging

1. BHP will update the waiting list annually through the Purge Process to ensure that the waiting list is current and accurate.
2. BHP will mail a letter to the applicant's last known address, requesting information regarding the applicant's continued interest in maintaining a place on the waiting list. If the applicant did not notify BHP of a move, as required, BHP will not be responsible for the applicant's failure to receive the updated request.
3. The update request letter will include a deadline date by which applicants must contact BHP of their continued interest, by mail or in person. If BHP fails to receive the applicant's notice of continued interest by the deadline date, the applicant's name will be removed from the waiting list.
4. If the letter is returned by the Post Office, with the forwarding address noted, BHP will re-send the letter.
5. Applicants will be given 15 business days to return the notice of continued interest. BHP does not accept responsibility for mail delays.
6. If there is no response within 15 business days, BHP will send a termination notice to the applicant at the last known address with an opportunity for an informal review.

**IV. TENANT SELECTION AND ASSIGNMENT**

A. Resident Screening Criteria:

The screening process applies to all potential residents of BHP Public Housing properties. Once eligibility has been determined based on the criteria set forth by regulation, BHP shall evaluate each applicant to determine eligibility utilizing the Screening Criteria.

Staff Safety:

BHP will refuse service and housing to any applicant that violates BHP’s “Policy on Personal Safety” and the “Violence Free Zone Policy”.

BHP staff may deny admission to any otherwise eligible applicant whose behavior as an applicant or behavior in present or prior housing interfered with other residents or staff by diminishing their enjoyment of the premises by adversely affecting their health, safety, or welfare, or by adversely affecting the physical environment or financial stability of the property. Relevant information regarding behavior to be considered may include, but is not limited to, the following criteria:

1. FINANCIAL OBLIGATIONS—An applicant’s past performance in meeting financial obligations:
  - a. Rental Payment History—Obtain continuous landlord references, current within the past two years that addresses the frequency of late payments and any monies due at time of move-out. (Absence of rental history for the past two years, refer to Paragraph 1.b.)
  - b. Leasing/Credit History—Qualified applicants who have no prior leasing experience or stable employment history shall be given all due consideration with regard to personal references from three reliable sources other than relatives or friends (ie—clergyman, teachers, police, employer, medical provider, etc.) However, it is the applicant’s responsibility to verify their living arrangements for the past two years.
2. CAPACITY TO COMPLY—BHP may deny admission to an applicant (including applicants who wish to join an existing household within the apartment community) for one or more of the following conditions:
  - a. Not of legal age (18 years or older) or legally emancipated, or legally competent to enter into a rental agreement.
  - b. Serious or repeated (one or more) violations of prior lease agreements within the past two years, as verified by prior landlords, which served as a basis for termination of the lease by the landlord.
  - c. Arrest or conviction of the applicant or member of the applicant’s household in the past five years for a felony (ie—murder, rape, burglary, child abuse, controlled substance possession/distribution/manufacturing)

- d. Arrest or conviction of three or more misdemeanors in the past five years
- e. The applicant will have the opportunity to remove said convicted household member from the application to determine eligibility.

*NOTE: If the applicant is housed, the convicted household member will not be allowed to reside with the applicant.*

- f. An applicant's unwillingness to cooperate with management as verified by past rental history.
- g. BHP will deny housing assistance if it believes that the applicant's or household member's abuse or pattern of abuse of alcohol interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.

3. Sex Offender Policy

It is the policy of BHP to not allow any person convicted of a sex offense to live on HACB properties. Any applicant required to register as a sex offender will be denied admission. This policy also applies to minors.

4. Willingness to Care for the Apartment

Management may deny admission to applicants (including applicants who wish to join an existing household within the apartment community) who have demonstrated an unwillingness to care for the apartment as verified by current and previous landlord references.

5. Exceptions to Capacity to Comply

The following are exceptions to the capacity to comply noted in Subsection 2 of this section.

- a. Live-In Aides are not required to comply with the above capacity to comply with one exception. Live-in aides with a record of criminal activity, as previously described, will not be admitted to the household. A criminal background check will be run on any potential live-in aide.
- b. Move-in of the Live-In Aide must not result in overcrowding. A live-in Aide is not listed on the Rental Agreement and has no right to the apartment as a remaining member of a household.

- c. One remaining household member must be of legal age (18 years or older or an emancipated minor), legally competent, agree to accept full financial responsibility of the apartment and be capable of full compliance with the rental agreement. The Remaining Household Member(s) must notify the management staff within fifteen (15) days after the absence or removal of the Head of Household of their desire to remain in possession of the apartment as a Remaining Household Member(s).

*NOTE: The remaining household member(s) must transfer to the appropriate size apartment according to BHP's occupancy standards and transfer policy.*

C. Tenant Assignment:

1. Each applicant will be offered a unit of suitable type and size. If the applicant refuses a public housing unit, the applicant's name will go to the bottom of the public housing waiting list
2. An applicant would not be considered to have been offered a unit if:
  - a. The unit is not of the proper size and type and the applicant would be able to reside there only temporarily (e.g., a specially designed unit that is awaiting a disabled applicant needing such a unit.)
  - b. The applicant is unable to move at the time of the offer and presents clear evidence that substantiates this to BHP's satisfaction. Examples:
    - A doctor verifies that the applicant has undergone surgery and needs a time to recuperate;
    - A court verifies that the applicant is serving on a jury which has been sequestered.
  - c. Accepting the offer would result in undue hardship to the applicant not related to consideration of race, color, national origin, or language, such as making employment or day care facilities

inaccessible, the applicant presents clear evidence which substantiates this to BHP's satisfaction.

3. BHP will maintain a record of the units offered, including location, date, and circumstances of each offer, and each rejection or acceptance. BHP will note the reasons for any rejection.

V. **ANNUAL INCOME/ADJUSTED INCOME/TOTAL TENANT PAYMENT (Applicable to both Applicants and Residents of all HACB Owned and Managed Properties)**

A. Definition of Total Family Income and Assets

1. Includes anticipated total income from all sources received by the family head and spouse (even if temporarily absent), and by each additional member of the family, including all net income derived from assets income anticipated for the twelve (12) month period following the effective date of the initial determination or reexamination.

a. Income includes, but is not limited to the following:

- (1) Gross amount of wages and salaries, overtime pay, commissions, fees, tips, and bonuses, and other compensation for personal services;
- (2) Net income from operation of a business or profession;
- (3) Interest, dividends and other net income of any kind from real or personal property (where net Family Assets exceed \$5,000 annually, see paragraph 3 below);
- (4) Full amount of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits;

- (5) Unemployment, disability compensation, worker's compensation and severance pay;
- (6) Welfare Assistance;
- (7) Alimony, child support payments and regular contributions or gifts received from persons not residing in the dwelling;
- (8) All regular pay, special pay and allowances of a member of the Armed Forces (whether or not living in the unit, who is head or spouse or other person whose dependents are residing in the unit);

2. Annual Income does not include:

- a. Sporadic income that is temporary, or of a non-recurring nature includes the following:
  - (1) Sporadic gifts;
  - (2) Amounts reimbursed for the cost of medical expenses;
  - (3) Lump sum assets such as inheritances, insurance payments, one time lottery winnings, or SS or SSI delayed payments;
  - (4) Portions of educational scholarships provided for tuition, fees, books, equipment, materials, supplies, transportation and miscellaneous personal expenses
  - (5) Hazardous duty pay of a family member in the Armed Forces;
  - (6) Hostile Fire/Imminent Danger Pay;
  - (7) Holocaust reparation payments;
  - (8) Earnings in excess of \$480 for each full-time student;
  - (9) Adoption assistance payments in excess of \$480 per adopted child;

- (10) Earnings/benefits from public funded employment training and supportive services;
- (11) Refunds or rebates for property taxes on dwelling units;
- (12) Amounts paid by the State to offset costs of keeping a developmentally disabled member at home.

b. Other income not used in determining Annual Income:

- (1) Income from employed children (including foster children) under the age of 18 years;
- (2) Payment received for care of foster children;
- (3) Relocation payments paid under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970;
- (4) Allotments received for coupons under the Food Stamp Act;
- (5) Payments to volunteers under the Domestic Volunteer Service Act of 1973;
- (6) Payments received under the Alaskan Native Claim Act;
- (7) Income from land in trust for certain Indian Tribes;
- (8) Payment of allowances for Federal Energy Assistance Program;
- (9) Amounts received from programs funded in whole or in part under the Job Training Partnership Act;
- (10) Settlement claim funds of the Grand River Band of Ottawa Indians;
- (11) The first \$2,000 of per capita share awarded from Court of Claim or Indian Tribes;

- (12) Amounts received from training programs funded by HUD;
- (13) Amounts received by a disabled person that are disregarded in determining supplemental security income eligibility and benefits because they are set aside under a plan to achieve self-support (PASS programs);
- (14) Amounts received to cover out-of-pocket expense necessary to participate in a publicly-assisted program;
- (15) Income of a live-in aide;
- (16) Payments made to individuals under Title V of the Older Americans Act;
- (17) Earned Income Tax Credit Refunds;
- (18) Reimbursement costs under the Child Care and Development Block Grant Act of 1990;
- (19) Agent Orange Settlement Fund payments;
- (20) Grants/Scholarships under Title IV of the Higher Education Act of 1965;
- (21) Maine Indian Claim Settlement of 1980.

3. Net Family Assets include cash, stocks, bonds, savings, trusts, value of equity in real property, and other forms of capital investments excluding the cost that would be incurred in disposing of the assets.

- a. Any income distributed from a trust fund shall be included in determining annual income (excluding personal automobile and household furnishings).
- b. Any assets disposed of for less than fair market value will be included if disposed of two (2) years preceding the date of application or reexamination.

- c. When the family has Net Family Assets in excess of \$5,000 Annual Income shall include the greater of the actual income derived from all Net Family Assets or a percentage of the value of such assets based upon current passbook savings rates as determined by HUD.
- d. Applicants or residents who have assigned, conveyed, transferred or otherwise disposed of any asset and retained any legal interest therein, shall have the value of such assets based upon current passbook savings rates as determined by HUD.
- e. In all cases it shall be the responsibility of the applicant or tenant to provide the necessary documentation to establish the legal ownership of equity in any assets.

B. Adjusted Income

Adjusted income means Total Family Income minus the following:

- 1. \$480 for each member of the family residing in the household, (other than the head of household or spouse) who is under 18 years of age or who is 18 years of age or older and is disabled, handicapped or a full-time student;
- 2. \$400 for any elderly family;
- 3. Medical expenses in excess of 3 percent of annual family income for any family with an elderly head of household;
- 4. Non-reimbursed child care expenses to the extent necessary to enable another member of the family to be employed or to further their education. The amount deducted shall not exceed the amount of income received from such employment. (This provision applies only to child care for children under 13 years of age.)
- 5. Handicapped assistance expense in excess of 3 percent of annual family income to the extent it is required for apparatus or attendant care for a handicapped member of the family, the combined medical expense and

handicapped assistance expense in excess of 3 percent of annual family income will be deducted.

6. Unreimbursed medical expenses for non-disabled/non-elderly families who have a handicapped family member if the deduction enables the handicapped person to be employed.
7. Child support payments of up to \$480 per child per year who do not reside in the assisted household.
8. Alimony payments of up to \$550 per year.

C. Total Tenant Payment

1. Total Tenant Payment is the monthly rent amount determined by the following:
  - a. Total Tenant Payment shall be the highest of the following:
    - (1) 30 percent of monthly adjusted income (1/12 of annual adjusted income); or
    - (2) 10 percent of monthly gross income; or
    - (3) \$50 Minimum Rent.
    - (4) Flat Rent
    - (5) Pro-Rated rent due to the Non-Citizen Rule.

2. Flat Rent

- a. Flat Rent:

Flat rent is a rent that is not based on income. BHP has chosen to set flat rents for the public housing program as equal to a payment of 50% of Area Median Income. Current Flat Rents are available upon request from BHP.

- b. **Tenant Choice**  
All public housing residents may choose to pay either the income based rent (the greater of C, 1, a, (1), (2), (3)) or the flat rent. BHP will assume that the resident shall always choose to pay the lowest amount of rent possible and the lease amendment will reflect this amount.
- c. **Flat Rent Applicable for Failure to Recertify**  
Resident rent shall be set at the flat rent if the resident fails to recertify by the annual recertification date.
- d. **Switching Rent Method Due to Financial Hardship**  
If a tenant selected to pay the flat rent, the resident may have the rent switched to an income based calculation under the following circumstances:
  - (1) Reduction in income due to the unanticipated loss of a job.
  - (2) Death of a wage earner in the household.
  - (3) Extraordinary or unanticipated<sup>1</sup> expenses due to medical costs, child care, transportation, education.

Once the tenant switches to an income based rent calculation, BHP will not switch rent back to flat rent until the next annual recertification.

- 3. **Procedure for Pro-Rating Rental Assistance for Mixed Eligible and non-Eligible families**
  - a. Determine Total Tenant Payment (include income from all family members--including those who do not have eligible immigration status.)
  - b. Subtract the TTP from the Flat Rent (Section 8 Payment Standard per the bedroom size). This number equals the "Family Maximum Subsidy" the family is eligible for IF all of the family members have eligible immigration status.

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<sup>1</sup> Extraordinary or Unanticipated expenses must be verified and approved by BHP.

- c. Divide the Family Maximum Subsidy by the number of persons in the family who have eligible immigration status. This number equals the family "member maximum subsidy."
- d. Multiple the Member Maximum Subsidy by the number of eligible family members. This equals the family's "eligible subsidy."
- e. The family's rent equals the Flat Rent minus the amount of eligible subsidy.

**Example**

6 Family Members  
 4 are eligible, 2 are not eligible  
 Occupy a 3 bedroom unit.

TTP = \$200  
 Flat Rent = \$927

Step 1: Subtract the TTP from the Flat Rent ( $\$927 - \$200 = \$727$ )  
 \$952 equals the Family Maximum Subsidy

Step 2: Divide the Family Maximum Subsidy by the total number in the family ( $\$727/6 = \$121$ ) \$121 equals the Member Maximum Subsidy

Step 3: Multiply the Member Maximum Subsidy by the number of eligible family members ( $\$121 \times 4 = \$484$ ) \$484 equals the family's eligible subsidy

Step 4: Subtract the Flat Rent minus the Eligible Subsidy. Equals family's rent ( $\$927 - 484 = \$443$ )

Pro-Rated Rent equals \$443.

- 4. Minimum Rent Hardship Exemption  
 BHP will work with residents paying minimum rent to avoid eviction if the family experiences a short or long-term hardship due to the following circumstances:
  - a. Reduction in income due to the unanticipated loss of a job.
  - b. Death of a wage earner in the household.

- c. Extraordinary or unanticipated<sup>2</sup> expenses due to medical costs, child care, transportation, education.

5. Disallowance of Earned Income

Per HUD regulation, BHP will not increase a resident's rent for a period of 12 months if the increase occurs under the following circumstances:

- a. The increase in income is attributable to a family member who had been previously unemployed for the past twelve months.
- b. The increase in income is attributable to a family member who had been participating in a self-sufficiency program during the past twelve months.
- c. The increase in income is attributable to a family member who had been receiving welfare during the past six months.

If the rent increase is due to the above circumstances, the rent will not increase during the first twelve months. The rent will increase by 50% during the second twelve months. The rent will increase to its correct amount at the beginning of the third twelve months.

**VI. VERIFICATIONS (Applicable to both Applicants and Residents)**

A. Family Composition and Family Type

- 1. At initial eligibility, the applicant must provide copies of birth certificates as proof of family composition. (Colorado Driver's License or State ID card also acceptable.)
- 2. Verification of a disability may be required in order to determine if an applicant's disability is in accordance with definitions of handicapped and disabled as provided in Section I.
- 3. Full-Time Student verification is required from a school official in order to qualify for the dependent deduction for those dependents who are 18 years of age or older.

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<sup>2</sup> Extraordinary or Unanticipated expenses must be verified and approved by BHP.

4. If an applicant or a resident loses custody of the minor child, BHP will determine the unit size based on the following: At the time of the recertification, if the child (or children) have been absent from the household for six consecutive months, then BHP will require that the applicant or resident move into or transfer into an appropriate unit size.
5. If an applicant or resident does not have full custody of the child, the individual caring for the child or children the “majority of the time” will be eligible for counting that child (or children) in the family composition. “Majority of the time” may also be determined by where the child (or children) are enrolled in school.
6. A family member who is enrolled in school or college and not living with the family a majority of the year, will not be considered to be a part of the household for determination of household size. Majority of the time is further defined as more than 6 months in a one year period.

B. Income and Assets

1. All income, asset information, and residency status information necessary for admission and continued occupancy will be verified by BHP. Written inquiries will include a statement of the purpose of the inquiry and a statement by the applicant to permit the source to release information.
2. When an applicant or tenant reports annual income that appears to be less than adequate for the family's needs, or if the family appears to be eligible for income that is not reported to be received, (i.e., AFDC, Welfare, unemployment compensation, child support, etc.) the absence of such income will be verified.

C. Medical Expenses

1. To receive a medical deduction, the applicant must verify the deduction by a qualified professional. Medical deductions may include (but are not limited to) the out-of-pocket expenses that is not paid or reimbursed by medical insurance of
  - a. On-going therapy or treatment.
  - b. On-going prescriptions or over-the counter medications or supplements that are prescribed by a physician.

c. The balance of any medical bill that the applicant or resident anticipates they will pay during the next 12 month period.

2. Medicare costs may be verified by the Department of Social Security. Homecare costs may be verified by the provider, the Department of Social Services, or a paid receipt.

D. Child Support and Alimony Payments

Child support and alimony payments must be verified via cancelled checks, direct deposit statements etc. . . Court orders are not acceptable forms of documentation.

E. Preferred Method and Form of Verifications

1. All verification will be obtained prior to initial lease date. For all subsequent reexaminations the verification process will begin 120 days prior to the initial lease date to ensure that current and accurate data are being used in calculating rents.

2. All increases and decreases in income which affect rent between admission and reexamination will be verified in accordance with the above provisions.

E. File Documentation

1. Applicant/Tenant must furnish verification or provide authorization for BHP to obtain verification from a third party of all statements regarding income, assets and allowances. Certification by signing the Application for Admission or the Recertification Application will normally be considered sufficient verification of family composition.

2. All income, assets, and each applicable deduction or exemption will be verified at the time of admission and at each subsequent reexamination. If written third party verification is not possible, a review of documentation provided by the family may be accepted. (ie--benefit checks, income tax returns, benefit award letters, savings and checking account statements, estimated market value of real estate from tax statements, United States Savings Bond redemption values, and other supporting documents.)

3. BHP will request additional information prior to determining eligibility, such as, but not limited to the following:
  - a. The verification of past rental history;
  - b. Written personal reference letters.
4. Minors under the age of 18 will not be allowed to sign a lease unless the minor has been legally emancipated.

**VII. OCCUPANCY STANDARDS**

- A. The following standards will determine the number of bedrooms required to accommodate a family of a given size, except that such standards may be waived for legitimate reasons on a case by case basis and as necessary to achieve or maintain full occupancy:

<u>Number of Bedrooms</u>	<u>Number of Persons</u>	
	<u>Minimum</u>	<u>Maximum</u>
<b>0</b>	<b>1</b>	<b>1</b>
<b>1</b>	<b>1</b>	<b>2</b>
<b>2</b>	<b>2</b>	<b>4</b>
<b>3</b>	<b>3</b>	<b>6</b>
<b>4</b>	<b>6</b>	<b>8</b>
<b>5</b>	<b>8</b>	<b>10</b>

- B. Two children of opposite sex under six years of age may be permitted to occupy the same bedroom. At admission, one child under two years of age may be permitted to occupy parent's bedroom.
- C. Every family member, regardless of age, is to be counted as a person. A mother and an unborn child will be placed on a two bedroom waiting list.
- D. BHP must be told immediately and in writing when guests will live in the unit for seven days or longer. Per the lease agreement, a guest may not stay for two (2) fourteen consecutive day periods in a six month period of time. A visitor or additional family member added to the lease will be screened and must be approved by the Eligibility Coordinator.

- F. An empty unit is considered abandoned and in violation of the lease if unoccupied for over 30 days, unless otherwise approved by BHP.
- F. The unit is to be the primary residence of the tenants and no one else unless approved by BHP. The unit may not be sublet by the tenant.
- G. Live In Aide  
A live-in aide who is not a member of the family will not be listed on the lease as a household member. The income of the aide will be not be counted as income for the household. When the family requests a live-in aide, the transfer to accommodate the live-in aide will be done in accordance with the transfer policy.

When the lease is terminated, the live-in aide will have no rights to the unit.

## **VIII. TRANSFERS**

BHP strives to provide appropriate housing to current residents before placing applicants from the waiting list. BHP will attempt to offer residents in need of a transfer, a unit of appropriate size within their current site and within their current program. If no unit is available, then another site or program may be offered.

- A. Transfers will only be made in the following situations:
  - 1. Family composition does not match BHP occupancy standards.
  - 2. There is a need to reasonably accommodate the needs of a disabled family.
  - 3. There is a documented safety issue that necessitates a new unit.
- B. The following criteria will also be applied for a unit transfer:
  - 1. To be eligible for a unit transfer, one year of tenancy must have been completed.
  - 2. Families must be suitable for the size of available units based on the Housing Authority of the City of Boulder Occupancy Standards.

3. A new lease will be executed for the new residence at the time of transfer. A resident has one right of refusal for a transfer unit. The 2<sup>nd</sup> available unit of the appropriate size, type, etc. . . must be accepted.
4. The tenant has seven (7) days to move from the first unit to the transfer unit. Each additional day that the first unit is occupied over the seven days, the tenant will be charged a daily pro-rated rent for occupying the initial unit. A tenant has a total of fourteen (14) days to occupy both units. Occupying both units for longer than two weeks provides BHP with the ability to pursue eviction from both units.
5. Deposit must be made in full for the new residence. The existing deposit will be refunded within 30 days of move-out minus any tenant charges.
6. Screening as described in this policy will be conducted.
7. If a unit, which has been modified to accommodate disabled individuals, is occupied or offered for occupancy to a resident not requiring such accommodations, resident herein agrees to be relocated to a similar unit, upon availability, in order to accommodate resident/applicant requiring such accommodations. BHP will incur only utility connection fee expense for gas and electric. Further, BHP will not be responsible for security deposits that may be required.
8. If an appropriate unit does not become available within six months of the need for a transfer being documented, or if BHP is not able to accommodate the reason for the transfer request, then BHP may offer Section 8 assistance.
9. If a resident declines the first available unit of appropriate size, then the next available unit of the appropriate size must be accepted.
10. If a resident declines the offer of a transfer, the resident's name will be placed at the bottom of the transfer list.
11. A resident will be transferred only once because of a request for reasonable accommodation. After the first transfer request, the Boulder Housing Partners will approve the resident for the Section 8 program. More than one transfer will be considered a financial burden.

## **IX. LEASING**

- A. Prior to admission, the lease shall be signed by all adult family members (over the age of 18 or an emancipated minor) and subsequently executed by BHP.
- B. After the lease is signed, a physical move-in inspection of the unit will be made by the prospective tenant and HACB staff to note any deficiencies.
- C. The lease is to be current at all times and must be compatible with BHP policies as well as State and Federal Law. At annual recertification, residents will be required to sign a lease amendment or new lease agreement.
- D. Notices of rent adjustments that are issued to amend the dwelling lease shall be signed by BHP and the tenant.
- E. If, through any cause, the signer of the lease ceases to be a member of the tenant family, the lease is to be voided and a new lease agreement executed and signed by the new head of household provided the family remains eligible.
- F. If at any time during the life of the lease agreement, there is a change in the resident's family composition that results in the need to amend provisions of the lease, one of the following will be undertaken.
  - 1. The existing lease will be canceled and a new lease executed, or
  - 2. An appropriate rider will be prepared and made a part of the existing lease; or
  - 3. Appropriate insertions are to be made within the instrument; and
  - 4. All copies of riders and insertions are to be signed by all parties involved and a copy maintained in the tenant file.
- G. A Security Deposit will be required and shall be payable at the time the lease is signed. The amount of security deposit will be that amount as approved by the Authority's Board or as regulated by specific HUD regulations. (For all owned

and managed properties, the security deposit is \$300 for families and \$200 for elderly and disabled persons. Refer to Attachment B).

1. Security deposits must be paid in full at the time of move-in.
2. Security Deposits will be deposited in the General Fund and will be used for all tenant charges, unless otherwise deemed by HUD.
3. Interest will be paid to the tenant on the Security Deposit within 30 days of lease termination. Where not regulated, interest on Security Deposits will be paid to the Resident's Organization (if one exists) in the complex where the resident lives.
4. At the time a tenant vacates a leased unit, BHP will conduct a physical move-out inspection of the unit to determine the condition of the unit. Reference will be made to the original move-in inspection notes. If the unit is clean and without damage and all tenant accounts paid, the check will be issued to the tenant at his or her forwarding address within 60 days. It shall be the responsibility of the tenant to advise BHP of his/her new address.
5. If the unit is not clean or is damaged, BHP has the authority to clean and/or make repairs. The tenant charges will be deducted from the Security Deposit. Any balance due the tenant will be refunded within 60 days.
6. Any expense for cleaning and/or damage or other tenant charges in excess of the amount of the Security Deposit must be paid at once by the tenant. If not paid within one month BHP will take appropriate action to collect back payments and charges. If the tenant passes away, tenant charges will be assessed to the security deposit. If the tenant charges exceed the security deposit, the tenant's family will not be held accountable for the deceased debts.
7. When relocation or transfer is required to comply with occupancy standards, the following will apply:

- a. A physical move-out inspection will be made by BHP, referring to the original physical inspection notes, made at the time of the move-in.
- b. If it is found that tenant damages exist, the damages will be corrected by either the tenant or BHP. When appropriate; the charges will be applied to the tenant's security deposit.
- c. If the deposit is not adequate to cover the damages the tenant will make immediate arrangements to reimburse BHP for the difference.
- d. This policy in no way alters BHP to proceed with eviction when the tenant has clearly violated the lease requirements.

H. Inspections:

BHP shall perform a physical, preventive maintenance inspection of all dwelling units no less frequently than once per year. Copies of the inspection shall be maintained in the unit file at the maintenance office.

**IX. RECERTIFICATION**

Annually, from the first of the same month in which the lease was signed, and at interim periods as circumstances may prescribe, the tenant will furnish information and certifications to BHP as to family income, employment, and family composition, for use by BHP. The annual recertification date will be used for determining if the rent should be changed and if the dwelling unit size is still appropriate for the tenant's needs.

A. Rent Adjustments

Rent as fixed at time of move-in will remain in effect for the one year unless any of the following occur:

1. A change of income occurs which results in a decrease in rent. All changes must be reported to BHP in writing within ten (10) days of its occurrence.

2. A change in family composition must be reported in writing within ten (10) days of the date of the change.
3. If it is found that the tenant has misrepresented the facts upon which rent is based, and the tenant is paying less than they should have been charged, then the increase in rent will be made retroactive to the time the increase should have occurred. Payment arrangements must be made with BHP or lease termination may occur.
4. If at the time of admission or reexamination, due to unusual circumstances, projected annual income cannot be determined with any reasonable degree of accuracy, a temporary rent for a specified period not to exceed 90 days may be established. At the expiration of the specified period, or such earlier time that the income becomes stable, a new rent will be established.

**B. Interim Re-Examinations and Cut-Off Dates**

**1. Rent Decreases**

In the case of an interim reexamination that result in a rent decrease, the adjustment will become effective the first of the following month after the month it is reported if the change is reported by the 20<sup>th</sup> of the month. If the change is reported after the 20<sup>th</sup> of the month, then the decrease will take effect the first of the second following month.

If the rent decrease is due to welfare fraud or failure to comply with welfare requirements, then BHP will not adjust the rent lower.

**2. Rent Increases**

In the event of rent increases, BHP will provide the tenant with a 30 day notice of the increase, unless the rent increase results from a finding of intentional misrepresentation under subsection **A(3)** of this section.

BHP will only adjust a rent increase if the family has an increase in income totaling more than \$250 gross income/month.

**C. Changes in rent resulting from a scheduled reexamination are to be effective on the anniversary date of the lease.**

**XI. MISREPRESENTATIONS**

The tenant is to be notified, in writing, of any misrepresentations or lease violations revealed through reexamination, rent review, or other occurrences.

The applicant/tenant certifies that accurate information has been provided on family composition, income, net family assets, allowances and deductions. Any misrepresentation is considered to be a violation of Federal regulations and may result in lease termination, applicant denial and/or punishment under Federal Law.

Allegations, complaints, or other observations that indicate a family is receiving more benefits than it is entitled to receive will be investigated by BHP. False statements that result in the tenant paying less rent, or BHP's overpaying of rental assistance will be vigorously pursued by BHP. After verification of these misrepresentations, BHP will take all necessary steps to recover the un-entitled payments including administrative actions, or civil or criminal court actions, as it deems appropriate.

**XII. RENT ACCEPTANCE AND REPAYMENT POLICY**

A. Rent Acceptance Policy

A resident may request the Late Payment Team to review his or her individual situation when seeking exceptions to the rent acceptance policy.

<b>Time</b>	<b>Action</b>
Before the 5 <sup>th</sup> at 5:00 pm	Accept any payment made by resident.
After the 5 <sup>th</sup> at 5:00 pm, before 14 Day Notice Mailed	Accept ONLY full rent payment from the resident. Rent accepted by money order only.
After 14 Day Notices Mailed	Accept ONLY full payment plus a late fee. Rent accepted by money order only.
After 3 Day Notice Posted	Accept ONLY full payment plus a late fee. Rent accepted by money order only.

After 3 Day Notice Expired	No payments accepted for rent. Housing Authority will be going to court for non-payment eviction. (If the resident just owes a late fee, then accept late fee.)
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1. If the rent has been late three times in six months, BHP will require the resident to sign a lease amendment stating that they understand that if they pay late one more time in the next year, the Housing Authority will move to evict them.
2. BHP will include a copy of Resolution 23 with the fourteen day notices.

**B. Current Rent Repayment Agreements**

1. BHP will not enter into repayment agreements with a resident who is not able to pay their current rent.
2. If a resident has an emergency situation, the Property Manager or Resident Manager may enter into a repayment agreement for the current month's rent. The following conditions apply:
  - The resident must provide written 3<sup>rd</sup> party verification from a professional, service provider, or advocate prior to 5:00 pm on the 5<sup>th</sup> of the month regarding the emergency. The emergency must be of a safety or health concern. The verification must state why the resident had to use money set aside for rent for other health or safety expenses.
  - The repayment agreement may be for a period of time not to exceed three months.
3. BHP will only enter into one repayment agreement for current rent per year.
4. If the resident provides written third party verification about the emergency situation prior to the 5:00 pm on the 5<sup>th</sup>, BHP will waive the late fee.
5. A Resident Manager or Property Manager may waive the late fee after the 5<sup>th</sup> of the month, if a resident provides written documentation regarding

why the rent was late and why it was not under his/her control. This includes late benefit checks due to a problem with the originating agency.

C. Repayment Agreement Policy:

1. A written agreement shall/will be executed between BHP and tenant stating amount owed by tenant and the monthly payment for retro rent and work order charges.
2. If one payment is not paid, then the entire amount of the repayment agreement is due. BHP will pursue eviction for non-payment of rent or non-payment of monies owed under a repayment agreement. BHP will only sign two payback agreements for non-reporting of income changes.

**XIII. TENANT COOPERATION AND COMMUNITY SERVICE RESPONSIBILITIES**

- A. All applicants or tenants must complete required forms and supply requested information in a timely fashion.
- B. Applicants and tenants are responsible for supplying complete and accurate information.
- C. Failure or refusal to do either of the above is grounds for eviction or a rent increase to the flat rent.
- D. Community Service Responsibility  
Non-Exempt residents of public housing units are required to perform eight (8) hours of community service per month. BHP will verify at annual recertification that any non-exempt family members have completed 8 hours of community service per month. Tenants must provide written third party documentation of the volunteer activity. The following categories of residents are exempt:
  1. Any tenant 62 or older;
  2. Any tenant with a verified disability;
  3. Any tenant engaged in work activities;
  4. Any tenant participating in a welfare to work program;

5. Any tenant attending school. (Note: 18 year old and older students are not exempted when not attending school.)

#### **XIV. COMPLAINT PROCEDURE**

##### **A. Procedure for a Written Complaint**

The complaint procedure is not always a linear process and the steps may not always follow this progression depending on the situation and depending on to whom the resident communicates his/her complaint.

1. Resident or a Section 8 participant (Resident) submits a written complaint.
2. Resident delivers written the complaint to Property Manager or Resident Manager or Section 8 Specialist (Staff).
3. Staff logs the complaint in the site's complaint log.
4. Staff may investigate or research the complaint depending on the type of complaint received. Please review the descriptions of complaint types as listed below.
5. If the resident requests a written response to the complaint, staff acknowledges to the resident that the complaint was received and that staff will be following-up with appropriate action as necessary. Staff is not required to share the details of the BHP response with the complainant, particularly if confidentiality is of concern. This response is typically in written letter format.
6. Staff addresses the complaint as necessary. Typical responses may be a work order, lease violation letter, adverse action letter, verbal reminder, referral to mediation, or referral to Resident Services staff for a service evaluation.
7. If the complaint is about another resident, the complaint form and any communication about the complaint is placed in the file of the family that the complaint was about. A copy of the follow-up letter to the complainant goes in the complainant's file.

##### **B. When Complaint Goes to Supervisor, Co-Executive Director, or the Board of Commissioners**

1. Supervisor/Co-Executive Director first forwards the complaint to the appropriate staff person. If necessary or if requested, the supervisor/Co-Executive Director assists in whatever follow-up necessary per the above outlined steps.
2. The staff person logs the complaint in the complaint log.
3. If the complaint is not satisfied at the staff level, the complainant may request that the complaint be forwarded to a supervisor then to the Executive Director and then finally to the Board of Commissioners.

4. If the Board receives a complaint that has been fully reviewed by staff, the chair may appoint a sub-committee of the Board to hear the complaint.

**C. Types of Complaints and Responses**

**1. Neighbor to Neighbor Complaints**

These are our most frequent types of complaints. Neighbor to neighbor complaints are challenging to handle since it is often difficult to determine if there is a lease violation involved or if it is simply a personality conflict. If staff is able to determine that a lease violation has occurred, staff will follow-up as necessary to enforce the lease. If the complaint is a personality conflict then staff will ask the residents to try and resolve the issue. If this is not possible, staff refers the residents to outside resources such as mediation. Staff does not mediate neighbor to neighbor conflicts that do not involve a lease violation. For example, the Housing Authority may receive a complaint that Neighbor A said something derogatory under her breath to Neighbor B. Neighbor B denies even having seen Neighbor A on that day. These types of complaints are very difficult to resolve since staff did not witness the interaction.

**Policy or Procedure Complaints**

If a resident has been adversely impacted by a Boulder Housing Partner's policy or procedure, staff will let the resident know that they may request a grievance hearing. A grievance hearing officer would be called in to make a decision on whether the Housing Authority's proposed action was in accordance with our established policy and procedure. Hearing officers may also use discretion to help find a middle ground in these cases. For example, if a resident does not agree with his/her rent calculation, the resident could request a grievance hearing over the calculation. Grievance hearing officers are interviewed and appointed by the Resident Representative Council.

**Complaints about Employees**

Residents will complain about staff. These are the most challenging complaints to handle. The supervisor will investigate the complaint and seek first to understand all the information available. Depending on the results of the investigation and the nature of the complaint, staff will follow-up as is appropriate with the employee and the resident. If necessary, Human Resources staff will be involved as counsel if reprimands or other behavioral correction action is necessary for the employee.

**Building/Environmental Complaints**

These types of complaints often involve problems on the sites. For example, there is an icy patch by the laundry room, or there is a dead tree limb hanging beside apartment 3b. These complaints are addressed by a work order or having the situation remedied by a manager. Staff typically does not write a follow-up because the resolution to the complaint is obvious.

**D. Options Available to Residents**

Residents have access to due process outside of Boulder Housing Partner's internal complaint procedure. Residents may utilize resources if they feel that their complaints are not being addressed in an adequate manner. Staff will assist residents in identifying the resources that may be available to them.

**1. Grievance Hearing**

If a resident believes that they have been adversely impacted by a decision or action of Boulder Housing Partners, the resident has the right to request a grievance hearing regarding the issue. A grievance hearing is a meeting where the resident explains his or her situation to an objective third party grievance hearing officer. The grievance officer listens to the resident's issues and reviews the actions take by Boulder Housing Partners. The grievance officer makes a decision as to whether the actions taken by BHP are in accordance with policies and procedures and takes into account additional circumstances as described by the resident. The decision of the grievance officer is binding to the staff of BHP (unless an overturn of the decision is sought from the Board of Commissioners) and not binding to the resident. If the resident does not agree with the decision of the hearing officer, the resident may follow any and all legal remedies available to them.

The grievance officers are volunteer attorneys who are interviewed and appointed by the Resident Representative Council. Grievance hearings are also available to any resident/participant who does not agree with his/her rent calculation, reasonable accommodation decision, letter or adverse action, eviction notice, and/or termination notice.

**2. HUD Complaint with Office of Fair Housing**

The resident may also file a Housing Discrimination Complaint with HUD. BHP staff has HUD complaint forms available for residents upon request. This form is also included in the Section 8 briefing packet.

**3. Landlord Tenant Mediation**

Boulder Housing Partners receives many phone calls from private sector renters requesting assistance with a problem them have with their landlord. We refer these calls to the City's Community Mediation service.

**4. Reasonable Accommodation Process**

If a resident is disabled and one of Boulder Housing Partner's policies or procedures does not enable them to enjoy fully their housing assistance, the resident may request a reasonable accommodation.

**5. Mediation**

Staff will refer residents who are having difficult neighbor to neighbor problems to the City's Mediation services. Both parties need to agree to attend mediation.

**6. Legal Services/Legal Aid**

Staff will refer residents who feel they need legal representation to Boulder County Legal Services.

**XV. LEASE COMPLIANCE AND LEASE TERMINATION**

BHP will pursue lease compliance first, and eviction only when all avenues to cure the problem are explored and expended. If BHP is forced to pursue eviction, the full procedural guidelines outlined in the Eviction Notebook will be followed. The following represents BHP's policies regarding lease compliance and termination.

**A Grounds for Eviction**

1. The basis for eviction is the lease agreement between BHP and the tenant. All other rules and regulations of BHP are incorporated into the lease agreement by reference.
2. Grounds for lease termination may include, but not be limited to, any of the following:
  - a. The tenant must refrain from engaging in and to cause any member of the household, a guest, or any other person under Resident's control to refrain from engaging in any criminal activity or any alcohol abuse that **threatens the health or safety of other residents or of BHA employees** or the other **resident's right to peaceful enjoyment** of HACB's housing facilities and grounds.
  - b. Any drug-related criminal activity whether **on or off** BHP's housing facilities and grounds. A drug-related criminal activity means the illegal manufacture, sale, distribution, use, possession with intent to manufacture, sell distribute, or use a controlled

substance as defined in Section 102 for the United States Controlled Substances Act (21 U.S.C. 802).

- c. Failure to pay rent;
- d. Repeated failure to pay rent in a timely manner; (HACB policy establishes a repeated failure as late payment of 3 times or more in a six month period of time (Refer to Resolution 23)).
- e. Failure to furnish information to BHP for purposes of rent or dwelling unit redetermination;
- f. Misrepresentations of facts upon which rent or dwelling size is based;
- g. Repeated failure to meet with BHP after prior, written requests concerning redetermination of rent, dwelling unit size, or lease compliance;
- h. Failure to comply with any of resident's obligations under the Lease. Refer to Section 7 of the Lease for Resident's Obligations and Right to Use which sets forth tenant obligations such as:
  - Not assigning or subletting;
  - Notifying BHP in writing of any guests expected to occupy the premises for more than 7 consecutive days;
  - Acquiring written consent if using the dwelling for purposes other than a private dwelling;
  - Abiding by BHP's regulations;
  - Physically occupy the dwelling unit (except for reasonable absences);
  - Disposing of all garbage from the dwelling unit

### **C. Types of Eviction Notices and Documentation Needed**

1. HACB shall give written notice prior to termination of the Lease as follows:
  - a. 14-Day Notice/3-Day Notice combination in the case of failure to pay rent;
  - b. 3-Day only in the case of a substantial violation or criminal activity that falls under the *One Strike Policy* and threatens the health or safety of other Residents or HACB employees. Pursuit of the One Strike Policy eviction will be based on current HUD direction and consultation with BHP's eviction attorney.
  - c. Adverse Action/30-Day/3-Day combination in all other cases.

2. **Non-Payment of Rent**

**Policy**

- a. Rent is due on the first, and late if not paid by 5:00 pm on the 5<sup>th</sup> (unless otherwise posted).  
If rent is not received by 5:00 pm on the 5<sup>th</sup>, then the tenant is given a 14 Day Notice and assessed a \$25.00 Late Fee-- NO Exceptions.
- b. If BHP receives payment of some rent, but the tenant owes more than \$25.00, then the tenant is given a 14 Day Notice and assessed a \$25.00 late fee.
- c. If BHP receives most of the rent, but the tenant owes less than \$25.00, then BHP will send a reminder letter to the tenant.  
Note--If the tenant's rent is less than \$25.00 and tenant does not pay, then BHP sends 14 Day Notice and a Late Fee.
- d. Work Order Charges  
If the tenant is assessed work order charges over \$25.00 and does not pay, then BHP sends a 14 Day Notice and \$25.00 Late Fee  
If the work order charge is less than \$25.00, then BHP will send a reminder letter.

**Procedure**

- a. Late Payment meeting held 7<sup>th</sup>-9<sup>th</sup> of the month.

- b. Finance sends out 14 Day Notices and Grievance Procedures. Notices signed by Director of Housing Services or other occupancy staff.
- c. If BHP does not receive payment after 11 days, then BHP posts a 3 day notice to run concurrently with last 3 days of the 14 day notice
- d. If still no payment is received; BHP forwards both the 14 day and 3 day notices to BHP's eviction attorney. The eviction attorney files with the courts a non-payment of rent eviction.

### **3. Lease Compliance Evictions**

#### **Information Gathering Procedure**

- a. BHP must gather documentation or accrue information to document lease violations. Sources of information-- complaint forms from other residents, police reports, eye witness reports from staff, photos etc. . .
- b. BHP utilizes the Tenant Assistance Program (TAP) model if elderly or disabled involved. Team members to be involved if at a senior site.
- c. All lease violation letters **MUST** include reasonable accommodation language.

**Procedure** (Assuming BHP has documentation to pursue eviction):

- a. Adverse Action Letter Sent to Tenant  
Letter requests the tenant to come in for a meeting.
- b. If BHP decides to pursue eviction after the meeting, 30 day notice posted for tenant. Grievance Hearing information included with 30 Day Notice.  
Managers or property managers post notice.
- c. If tenant requests a grievance hearing, then the clock stops on the 30 day notice. Manager or property manager puts together file for grievance hearing.  
Choice of hearing officer sent to tenant. Hearing scheduled.

- d. Hearing held, and BHP waits for decision of the Hearing Officer.
- e. If Hearing Officer decides against BHP, BHP drops 30 day notice and abides by ruling (typically). Usually, there are recommendations from Hearing Officer on how this situation could be resolved without an eviction.
- f. If Hearing Officer decides for BHP, BHP posts a 3 Day notice.
- g. With 3 Day Notice, tenant has the ability to "Quit" which means vacate the apartment within the 3 days. If the tenant does not quit, then BHP pursues the eviction with the courts.
- h. If tenant does not vacate, BHP forwards the notices and hearing decision to BHP's eviction attorney.
- i. The eviction attorney files the eviction with the courts.
- j. If eviction upheld, BHP files immediately after court with Sheriff's department to have an officer supervise the removal of belongings.
- k. BHP notifies the local post office serving the dwelling unit that the individual or family is no longer residing in the unit.

## **XVI. PET POLICY**

BHP shall enforce a Pet Policy in accordance with HUD and Fair Housing provisions. This document is on file at BHP Administration Office and available to the public. (Attachment C)

## **XVII. HOUSEKEEPING POLICY**

Boulder Housing Partners enforces a housekeeping policy that is concurrent with our lease agreement. If a resident fails three housekeeping inspections in a six month period of time, BHP will initiate eviction proceedings. BHP will be work with the resident to resolve the problem if the resident signs a lease addendum stating that he/she will not fail another housekeeping inspection in the next six months.

**ATTACHMENT A--TENANT ASSISTANCE PROGRAM**  
**Framework for Problem Solving for Complaints**

**1. Identify the Problem:**

**Four Point Framework:**

\_\_\_\_\_ I. Violations of financial responsibility, fraud, or contract obligations.

\_\_\_\_\_ II. Violations of the quiet and peaceful enjoyment of others.

\_\_\_\_\_ III. Threatening Behavior/Damage to the property.

\_\_\_\_\_ IV. Criminal or Illegal Activity—Substantial Violations

**Action Initiating Response:**

\_\_\_\_\_ Non Payment

\_\_\_\_\_ Complaint from Resident

\_\_\_\_\_ Incident Form

\_\_\_\_\_ Referral for Service

\_\_\_\_\_ Notation to File

**2. Review the Situation:**

\_\_\_\_\_ Is this the first incident?

\_\_\_\_\_ Need for a letter?

\_\_\_\_\_ Notify of right to reasonable accommodation?

\_\_\_\_\_ Impact on other residents, staff and financial stability of property?

\_\_\_\_\_ Thoughts on the cause of the problem?

**3. Identify Your Own Feelings About the Issue:**

\_\_\_\_\_ Utilize Site Team Meetings to explore the strong feelings the resident's behavior evokes.

4. **Clarify Your Role as Manager:**

\_\_\_\_\_ Identify any resident resource or support

\_\_\_\_\_ Identify Staff involved, ie—occupancy, resident manager, resident services, management

5. **Take Necessary Action:**

Four Point Framework/Lease Violation Course of Action

1. \_\_\_\_\_ Letter?

\_\_\_\_\_ Notify of Accommodation Rights

\_\_\_\_\_ Referral for Assistance

\_\_\_\_\_ Lease Violation Warning

2. \_\_\_\_\_ Meeting?

\_\_\_\_\_ Invite Advocate

\_\_\_\_\_ Notify of Accommodation Rights

\_\_\_\_\_ Referral for Assistance

\_\_\_\_\_ Written Agreement for Behavior Change

\_\_\_\_\_ Follow-up

3. \_\_\_\_\_ Referral?

\_\_\_\_\_ Referral Form Completed

\_\_\_\_\_ Resident Service Contract

\_\_\_\_\_ Follow-up

4. \_\_\_\_\_ Non-Lease Issue

\_\_\_\_\_ Spoke with Resident

\_\_\_\_\_ Spoke with Complainant

**ATTACHMENT B**

**REQUIRED SECURITY DEPOSITS**

	<u><b>Non-Elderly</b></u>	<u><b>Elderly/Disabled</b></u>
<b>Public Housing</b>	<b>\$300</b>	<b>\$200</b>
<b>Pet Deposit</b>	<b>\$250</b> <b>+ \$50 non-refundable</b> <b>deposit</b>	<b>\$250**</b>

**\*\*Pet deposit is waived if pet is a companion animal as described in the Pet Policy**

### **Policy on Installation of Satellite Dishes**

- 1. Satellite dishes may not exceed one meter in diameter. You may not install any satellite dish larger than one meter (three feet three inches), measured across its widest part.**
- 2. Dishes may be installed only inside units or on residents' own patios or balconies. Satellite dishes may not be installed in locations other than your own leased space. This means that satellite dishes must be installed inside your unit, or on your patio or balcony. Also, no satellite dishes may be mounted on exterior walls, in common areas, on roofs, or at any other location outside of residents' own units.**
- 3. Satellite dishes may not be installed in ways that would enable them to fall on people from above. Satellite dishes may extend beyond the edge of a patio or balcony. Also, satellite dishes may not be mounted in windows or on window frames.**
- 4. Satellite dishes may not be installed in ways that damage units or buildings. No holes may be drilled in railings or exterior walls during the installation of satellite dishes (clamp-type mountings are permitted). Mounting satellite dishes in this way harms building weatherproofing and poses a risk to electrical wiring, water pipes, etc. . .**
- 5. Residents may not install satellite dishes themselves. Residents may have satellite dishes professionally installed with a member of the site maintenance staff present. To arrange for an installation, residents may call (303) 443-8330.**
- 6. Any improperly mounted or unsupervised installations of satellite dishes will be removed by the maintenance staff, and residents will be charged for the maintenance staff's time.**

**BOULDER HOUSING PARTNERS OF THE CITY OF BOULDER**  
**ADMINISTRATIVE PLAN**  
**FOR THE SECTION 8 PROGRAM**

**Revised October 1998**  
**Board Approved: November 10, 1998**  
**Revised July 1999**  
**Board Approved: September 27, 1999**  
**Revised July 2000**  
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**Board Approved November 4, 2002**

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## **PURPOSE OF THE ADMINISTRATIVE PLAN**

The purpose of Boulder Housing Partner's Section 8 Administrative Plan is to establish policies for carrying out the Section 8 Certificate and Voucher Programs in a manner which is consistent with HUD requirements but which are not a mere restatement of HUD-mandated policies and procedures. The plan covers admission, continued participation, and termination of assistance procedures in the Section 8 program. Policies are the same for the certificate, voucher, and over-FMR tenancy programs unless otherwise noted. The Administrative Plan will be approved by BHP's Board of Commissioners and submitted to the Department of Housing and Urban Development (HUD). Subsequent changes will also be approved and submitted to HUD.

BHP is responsible for complying with all subsequent changes in HUD regulations that pertain to these programs. If such changes conflict with this Plan, HUD regulations will have precedence.

## NON-DISCRIMINATION/504 POLICY

The Boulder Housing Partners of the City of Boulder (HACB) will administer the Section 8 program in a manner in which all are treated fairly and consistently.

BHP will not discriminate because of race, color, national origin, religion, creed, sex, age, disability, or familial status. BHP is bound by the nondiscrimination requirements of Federal, State, and local law. BHP will abide by the nondiscrimination requirements of:

- A. **Title VI of the Civil Rights Act of 1964**, which prohibits discrimination based on race, color, creed, sex, religion, national origin, familial status or disability in programs receiving Federal financial assistance;
- B. **Section 504 of the Rehabilitation Act of 1973**, which prohibits discrimination based on handicap in programs receiving Federal financial assistance;
- C. **The Age Discrimination Act of 1975**, which prohibits discrimination based on age in programs receiving Federal financial assistance; and
- D. **Executive Order 11603**, which requires HUD to take whatever action is necessary to prohibit discrimination based on race, color, national origin, religion (creed), or sex in housing receiving Federal financial assistance.
- E. **Fair Housing Amendments Act of 1988**, which prohibits security deposits that are based on age or handicap except in cases with elderly persons where such practices will not discriminate against families with children. A tenant must obtain the landlord's permission to modify a dwelling and the landlord may withhold permission until a responsible contractor is obtained. There can be no discrimination against families. The rule permits landlords to reject handicapped persons as tenants if they pose a social risk but not on the grounds of their handicap.

Staff will assist Section 8 participants who believe that they have been discriminated against in the private market. Staff will work to educate landlords as necessary to help Section 8 participants lease housing. If this

does not work, then staff will recommend that the Section 8 participant file a discrimination complaint with the Office of Fair Housing. These forms are provided both at the Section 8 briefing and are also available at the front desk of the agency.

### **SPECIAL ASSISTANCE**

It is the policy of the Boulder Housing Partners of the City of Boulder (HACB) to provide assistance to all its clients by allowing equal dissemination of all information relating to its programs and activities. Upon request, communicative services are available to all individuals with special needs.

For assistance or information, individuals who are deaf or hearing impaired may contact BHP during normal business hours by calling the TDD phone number, **(303) 441-3150**, which is located in the Administration Office.

In the event of an after-business hours emergency, Section 8 applicants/participants who are TDD/TTY users may contact **Colorado Relay Service** which is a communication service provided free of charge. By dialing **1-800-659-2656**, TDD/TTY users may contact their Occupancy Specialist via a trained TDD/TTY operator who will relay messages to and from the party which is being contacted.

If staff personnel are unable to communicate information relating to the programs or activities offered by BHP or meet the needs of a client or resident, alternative communicative resources can be requested. All HACB policies, forms, lease agreement, house rules etc. may be made available in large print upon request. If requested via BHP's reasonable accommodation policy, information relating to policies and activities of BHP may be tape recorded or transcribed in Braille.

The Boulder Housing Partners corresponds and requests information in writing, but an applicant/participant has the right to request alternative formats as a reasonable accommodation to a disability.

### **PRIVACY RIGHTS**

Applicants and participants will be required to sign the Federal Privacy Act and HUD Authorization for Release of Information, Form 9886, in conjunction with the HUD

50058 form which states under what conditions HUD will release Section 8 participant and owner information. BHP's policy regarding release of information is in accordance with these documents.

Requests for information must be accompanied by a written release request signed by the applicant/participant in order for BHP to release any information involving an applicant or participant, unless disclosure is authorized under Federal or State law.

## **REASONABLE ACCOMMODATION POLICY AND PROCEDURES**

### **A. POLICY**

BHP complies with the Department of Housing and Urban Developments (HUD) regulations implementing Section 504 (24 CFR Part 8, dated June 2, 1988). Any Section 8 participant with a disability has an opportunity to request a reasonable accommodation which will ensure the participant's full use and enjoyment of the program and allow equal opportunity to participate in, and enjoy the benefits of, a program or activity receiving Federal financial assistance. BHP will review each reasonable accommodation request on a case by case basis. BHP however, is not required to take any action that would result in a fundamental alteration in the nature of a program or activity or in undue financial and administrative burdens. Requests for reasonable accommodations may be obtained from BHP Administrative Office. BHP reserves the right to verify any claimed disability.

### **B. GUIDING PRINCIPLES**

1. The person requesting the reasonable accommodation is usually an expert in regard to his or her own disability and the accommodations that may be appropriate. Generally, BHP presumes that the information the person provides concerning his or her own needs is accurate and the method proposed for accommodating those needs is the most appropriate.
2. This procedure for evaluation and responding to requests for a reasonable accommodation relies on a cooperative relationship between BHP and the applicant/participant. The process is not adversarial.
3. The form "Request for Reasonable Accommodation" is designed to help applicants/participants and BHP. If an applicant/participant does not, or cannot, use the Request for Reasonable Accommodation Form, BHP will still respond to the request for an accommodation.

4. If the accommodation is reasonable (see procedure 3 below), BHP will grant the accommodation.
5. When the reasonable accommodation is requested by an applicant in order to overcome negative information, or by a resident in order to overcome a lease violation, BHP will utilize the Tenant Assistance Program Model.

If the accommodation is reasonable and produces a reasonable expectation of success, BHP will grant the request.

6. Reasonable accommodations will be focused on the individual and designed to address each person's situation.
7. Communications under this policy will be in plain language, in a format appropriate to meet the communication needs of the person with disabilities. Where the following procedures refer to written documents this plain language directive shall apply and alternative formats will be used in order to communicate information and decisions to the applicant or resident.

**C. PROCEDURE 1—Communication with Applicants and Participants**

1. All applicants will be informed of the reasonable accommodation policy at the time of application.
2. All participants will be notified of the reasonable accommodation policy of BHP at the time of recertification, upon notice of program violation, and upon request.
3. All decisions to grant or to deny reasonable accommodations will be communicated in writing and in the form requested by the individual.

**D. PROCEDURE 2—Sequence for Making Decisions**

1. Is the applicant/participant a qualified person with disability?

- a. If NO, BHP is not obliged to make a reasonable accommodation and may deny the request.
  - b. If YES, go to step 2.
  - c. If more information is needed, BHP will request additional information either in writing or through a request for a meeting.
2. Is the requested accommodation related to the disability?  
If necessary, request information with a written request for information letter.
3. Is the requested accommodation reasonable? BHP will make this determination by following Policy 3—Guidelines for Determining Reasonableness.
- a. If YES, BHP will approve the request for reasonable accommodation. A written description of the accommodation will be prepared and included in the approval letter.
  - b. If NO, BHP may deny the request. Denial will be made in writing.
  - c. If more information is needed, BHP will either write for more information or request a meeting.

**E. PROCEDURE 3—Guidelines for Determining Reasonableness**

- 1. In accordance with Principle #1, in most instances BHP will accept the judgement of the person with a disability that an accommodation is needed. However, BHP retains the option to require the person with disabilities to show the need for an accommodation to enable him/her to access and use of the housing program.
- 2. In accordance with principle #1, in most instances BHP will accept the judgement of the person with disabilities that the requested

accommodation is the most appropriate for him or her. However, BHP retains the option to investigate equally effective alternatives to the requested accommodation, and/or alternative methods of providing the requested accommodation.

3. If a number of potential accommodations would clearly satisfy the needs of the person with disabilities, BHP retains the option to select the accommodation which is most convenient and cost-effective for BHP.

The following steps refer to requested accommodations which are needed, and which represent the most appropriate means of accommodating the disability:

- a. Does the requested accommodation constitute a fundamental alteration to the scope of the Section 8 program? If so, BHP will deny the request.
- b. Does the requested accommodation create undue financial and administrative burdens for BHP? If so, BHP will comply with the request only up to the extent that we can do so without creating undue burdens. BHP reserves the right to have outside counsel assist in the determination of administrative or financial burden.

## **I. ELIGIBILITY FOR ADMISSION**

To be eligible for admission to the Section 8 program an applicant must qualify per the following conditions:

### **A. Family:**

1. A "family" may be a single person or a group of persons.
2. A "family" may or may not include children.
3. A "family" may be a group of persons consisting of two or more elderly persons or disabled persons living together, or one or more elderly or disabled persons living with one or more live-in aides is a family.

### **B. Elderly Family:**

A family whose head of household or spouse is:

1. at least 62 years old; **or**
2. handicapped; **or**
3. disabled.

### **C. Handicapped Person:**

A person who has a physical or mental impairment which is expected to be of long-continued duration; which substantially impedes his/her ability to live independently, and is of such nature that the disability could be improved by suitable housing conditions. (Section 3(b)(3), United States Housing act of 1937, as amended: Lower-Income Public Housing; and section 8, U.S. Housing Act of 1937, Housing Assistance Payments Program).

### **D. Disabled Person:**

A person disabled within the meaning of Section 223 of the Social Security Act or Section 102(b)(5) of the Development Disabilities Services

and Facilities Construction Amendments of 1970 is unable to engage in any substantial, gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period

**E. Continually Assisted Families**

It is the policy of BHP to remove a family's application from all waiting lists once the family has received housing assistance through the Boulder Housing Partners. Upon lease signing or upon HAP Contract execution for the Section 8 program, an applicant will be removed from all other waiting lists. Families that want to remain on a different waiting list may do so, but the family must inform BHP at the time of lease signing. Preference will be granted and families will be given the opportunity to transfer assistance when and after:

1. The family's application gets to the top of the waiting list; and
2. The family satisfies any and all debt to the Boulder Housing Partners or files a written request for an informal hearing regarding any outstanding debt, follows through the informal hearing review and satisfies any requirements made by the informal or legal hearing; and
3. The family has been in the initial program for 12 months.
4. The policy regarding inter-program (public housing, Sect. 8 Mod-Rehab, Sect. 8 New Construction, Sect. 8 Set Aside) transfers due to changes in family composition, medical or safety reasons, or as an accommodation to a disability is in BHP Statement of Policies for Owned and Managed Units

**F. Eligible Immigration Status**

In order for an applicant to be eligible to receive housing assistance, at least one family member must be a United States citizen, national, or a

certain category of eligible non-citizens. Once an applicant reaches the top of the waiting list, the initial screening of the applicant and his/her family will include declaration or verification of citizenship or eligible immigration status. Eligible immigration status categories are available in the July 26, 1995 Non Citizen Rule Federal Register. Documentation to prove citizenship consists of the following: 1) a signed declaration of eligible immigration status; 2) applicable Immigration and Naturalization Service (INS) documents; and 3) a signed verification consent form.

To qualify under this requirement, an applicant must declare citizenship or submit evidence of citizenship or eligible immigration status to the Boulder Housing Partners once the applicant reaches the top of the waiting list. If an applicant family does not declare citizenship, provide proof of eligible immigration status, or be in the process of receiving eligible status, housing assistance will be denied to that applicant. If there are members of the family who do not contend to be citizens or have eligible immigration status, then that family's housing assistance payment will be pro-rated.

At any time in the future that the family composition changes, proof of citizenship or eligible immigration status must be provided for that individual to be added to the lease and subsidized.

**G. Admission Restrictions Include the Denial of Participation for:**

1. Failing to repay previous debt to BHP or any other Boulder Housing Partners.
2. Committing fraud in connection with any HUD program, or failing to disclose previously committed fraud in connection with any HUD program.
3. Providing false information on the application.
4. A history of criminality, defined by the following:

- a. The applicant has been arrested or convicted of a felony against person or property in the past five years.
- b. The applicant has been arrested or convicted of three or more misdemeanors in the past five years.

BHP will utilize criminal background checks for all family members over the age of 18 in order to screen for past criminal history.

- 5. Applicant non-cooperation. Refusing or failing to complete required forms by the deadline, to supply requested information, and rudeness or incivility to staff of BHP. BHP will refuse service and housing to any applicant that violates BHP's "Policy on Personal Safety" and the "Violence Free Zone Policy."
- 6. Applicants who appear on HUD's List of Suspensions, Debarments, and Limited Denials of Participation.
- 7. Any applicant or applicant family member who is a registered sex offender will be denied admission to the Section 8 program. This includes sex offenders who are minors.

**H. Income for Admission**

- 1. Annual gross income cannot exceed the very-low income limits most recently published by HUD at the time of admission.

Very low income limits are 50% of Area Median Income. Income limits are posted and available upon request.

- 2. Per regulation, BHP must ensure that 75% of new admissions to the Section 8 program do not exceed the extremely-low income limits. Extremely low income limits are 30% of Area Median Income.

**II. MANAGING THE WAITING LIST**

**A. Order of Applicants on the Waiting List:**

1. Local Preferences
  - a. Residency Preference

Applicants who are residents or work in the city of Boulder receive priority on the waiting list. To be eligible for this preference by working, an applicant must be regularly employed in the city of Boulder. To qualify for living in the city of Boulder, an applicant must be able to document residency in the city of Boulder. Students receiving work study income are not considered employed for this priority.
  - b. Singles Preference

A single person who is elderly (62 years of age), disabled or displaced will be admitted before other single person(s).
2. All other things being equal, applicants will be placed on the waiting list by date and time of application.
3. Points will be awarded on the waiting list in the following manner. Those applicants with the least points will reach the top of the waiting list first:
  - a. 5 pts—families, elderly, disabled, or persons displaced by a natural disaster as defined by the Federal Emergency Management Agency who live or work in the City of Boulder.
  - b. 10 pts—elderly or disabled individuals who do not live or work in the city of Boulder.
  - c. 15 pts—families who do not live or work in the City of Boulder
  - d. 20 pts—single persons (not elderly, disabled, or displaced) who live or work in the City of Boulder
  - e. 25 pts—single persons (not elderly, disabled, or displaced) who do not live or work in the City of Boulder.

**B. Income Targeting**

BHP will administer the Section 8 waiting list so that 75% of new admissions to the Section 8 program earn less than 30% of Area Median Income (AMI). BHP will determine the number of admissions at less than 30% of AMI based on the number of admissions from the previous calendar year. This number will be determined once per year in January.

**C. Special Admissions—Non Waiting List**

BHP has memorandums of understandings or contracts with the following service agencies in Boulder County for the provision of housing to targeted populations in need: Boulder County SafeHouse, Boulder County Project Self-Sufficiency, Center for People with Disabilities, and the Community Outreach Effort (CORE). (CORE participants are Boulder County Mental Health Center, Boulder County Social Services, Center for People with Disabilities, and Emergency Family Assistance.) BHP accepts limited referrals from these agencies for Section 8 housing subsidies in order to facilitate housing accessibility to families who require the support of social service agencies.

D. BHP will provide priority to those families being transferred to the Section 8 program from the Owned and Managed portfolio due to reasonable accommodation.

E. To the extent possible due to availability, BHP will provide housing to those families or individuals who have been displaced due to a natural disaster in an area declared a federal disaster area.

**F. Qualification and Verification**

1. No information recorded on an application is verified until a Section 8 subsidy will be available within 60 days. BHP takes, at face value, family certification, and places the applicant on the waiting list according to the information provided.

2. Before the applicant is provided assistance, the applicant's eligibility will be verified.

### **III. APPLYING FOR ADMISSION**

#### **A. How to Apply for Housing**

1. Any person requesting an application for housing assistance will be provided the opportunity to fill out an application as long as the waiting list is open. If the waiting list is open, applications may be mailed or made in person at the main office of BHP.
2. The application will be reviewed for completeness, dated, time-stamped, and initialed by staff when the application is received.
3. Individuals who have a disability that would prevent them from making application may contact BHP to make special arrangements to complete their application.
4. The applicant is responsible for updating BHP with any change of address or change in family composition within ten days. Failure to do so may result in applicant's removal from the waiting list.

#### **B. Notification of Applicant Status**

1. Each applicant will be notified either verbally or in writing when his or her application has been received and placed on the waiting list.
2. Each applicant determined to be ineligible shall be promptly notified by BHP in writing of the reasons for the determination. This notice shall state his/her right, upon request within a reasonable time, to an informal review. For this purpose BHP may use a form letter, filling in appropriate information described in the preceding sentence.
3. BHP's communication with the applicant will in no way lead applicants to believe that the estimated date of housing assistance

availability is exact. All communication will stress that the estimated date of housing assistance availability is subject to factors that are beyond BHP's control such as turnover of assistance, additional funding etc. . .

4. Procedures for Applicant Denial

- a. Eligibility Coordinator makes initial determination regarding eligibility of an applicant.
- b. If the eligibility is clear-cut--either clearly eligible or clearly not eligible--Eligibility Coordinator will make final decision regarding eligibility.
- c. If the eligibility is not clear cut, the Eligibility Coordinator will assemble two other persons as the "Applicant Review Team" to review the file and assist in making the eligibility decision. The two other reviewers will be somehow related either to the property, program, or the resident manager function. This will be conducted in an informal manner--either by phone call or by impromptu meeting. Reviewers could be from occupancy staff, maintenance staff, or Healthy Communities staff.
- d. A decision will be made by group consensus or by majority vote if consensus is not possible.

5. **Informal Review**

- a. If an applicant is denied and requests an informal review, the Director of Housing Services will organize an Informal Review Team to hear the applicant's case. This will be a more formal meeting with a set date and time of the meeting.
- b. The Informal Review Team must be comprised of three persons who were not involved in the original decision to deny the applicant. The Director of Housing Services will select two persons associated with the program or property in question but not involved with original decision.
- c. A decision regarding the informal review will be made by group consensus or by majority vote if consensus is not possible.

### **C. Final Determination and Notification of Eligibility**

1. Applicants on the waiting list will be requested to fill out a personal declaration form when BHP estimates that housing assistance will be available in 60 days. This form will be completed in the applicant's handwriting whenever possible.
2. It is the responsibility of the applicant to provide documentation to verify the information placed on the original application.

An applicant's misrepresentation of any information on the application will be sufficient reason for denial of **Procedures for Applicant Denial and Informal Review Process**

#### **Applicant Denial**

- Eligibility Coordinator makes initial determination regarding eligibility of an applicant.
- d. If the eligibility is clear-cut--either clearly eligible or clearly not eligible--Eligibility Coordinator will make final decision regarding eligibility.
- e. If the eligibility is not clear cut, the Eligibility Coordinator will assemble two other persons as the "Applicant Review Team" to review the file and assist in making the eligibility decision. The two other reviewers will be somehow related either to the property, program, or the resident manager function. This will be conducted in an informal manner--either by phone call or by impromptu meeting. Reviewers could be from occupancy staff, maintenance staff, or Healthy Communities staff.
- f. A decision will be made by group consensus or by majority vote if consensus is not possible.

#### **Informal Review**

- If an applicant is denied and requests an informal review, the Director of Housing Services will organize an Informal Review Team to hear the applicant's case. This will be a more formal meeting with a set date and time of the meeting.
- g. The Informal Review Team must be comprised of three persons who were not

involved in the original decision to deny the applicant. The Director of Housing Services will select two persons associated with the program or property in question but not involved with original decision.

- h. A decision regarding the informal review will be made by group consensus or by majority vote if consensus is not possible.

**D. Removal from Waiting List and Purging**

1. BHP will update the waiting list annually through the Purge Process to ensure that the waiting list is current and accurate.
2. BHP will mail a letter to the applicant's last known address, requesting information regarding the applicant's continued interest in maintaining a place on the waiting list. If the applicant did not notify BHP of a move, as required, BHP will not be responsible for the applicant's failure to receive the update request.
3. The update request letter will include a deadline date by which applicants must contact BHP of their continued interest, by mail or in person. If BHP fails to receive the applicant's notice of continued interest by the deadline date, the applicant's name will be removed from the waiting list.
4. If the letter is returned by the Post Office, with the forwarding address noted, BHP will re-send the letter.
5. Applicants will be given 15 business days to return the notice of continued interest. BHP does not accept responsibility for mail delays.
6. If there is no response within 15 business days, BHP will send a termination notice to the applicant at the last known address with

an opportunity for an informal review.

7. Applicants will be removed from all wait lists on the date they are issued a Section 8 Certificate or Voucher. The applicant can request, in writing, to remain on any other program waiting list.

#### **IV. RECORD-KEEPING**

BHP will keep records of the following information for all applicants for the Section 8 Program:

- A. The date and time of receipt of original application;
- B. The determination of BHP as to eligibility or non-eligibility of the applicant;
- C. When eligible, the subsidy size for which the applicant is eligible;
- D. Date of contact once the applicant reaches the top of the waiting list;
- E. The date of offer of a certificate or voucher (as applicable) and whether it was accepted or rejected.

#### **V. ELIGIBILITY FOR PARTICIPATION IN THE SECTION 8 PROGRAM**

- A. The applicant is responsible for producing sufficient credible information to satisfy BHP that they meet all of the eligibility standards. BHP shall require the applicant to obtain and submit to it the documentation which it deems to be necessary.
- B. Information relative to the acceptance or rejection of an applicant shall be documented and placed in the applicant's file. Such documentation may include reports of interviews, letters, or telephone conversations with sources. Such reports shall indicate the date, the source of the information, including the name and title of the individual contacted, and a summary of the information received.
- C. BHP will not establish eligibility criteria on the basis of an applicant's

suitability as a tenant or expected behavior as a tenant. BHP's determination of eligibility does not mitigate a landlord's/owner's responsibility for selection or screening of tenants for his/her unit. BHP in no way guarantees the suitability or behavior of the Section 8 participants as tenants.

- D. If the applicant falsifies, misrepresents, or gives any incomplete information required in the application process, or if the applicant is found to have falsified information supplied during the past two years in connection with any other Federally subsidized housing program, the applicant shall be disqualified from participating in the Section 8 program. BHP may deny housing assistance until such time as the applicant has demonstrated that he/she meets BHP eligibility criteria.
- E. If the applicant is declined eligibility, the applicant will be notified in writing of their right to an informal review.

#### **Ineligibility Due to Drug-Related Criminal Activity**

- A. Families/individuals evicted from housing assistance under the U.S. Housing Act of 1937 for drug-related criminal activity (this would include the manufacture, sale, use or possession of an illegal substance) will be ineligible for admission three (3) years from the date of the eviction.
- B. HACB may prohibit admitting any person to the Section 8 program in cases where BHP determines that there is reasonable cause to believe that a person's abuse of alcohol or pattern of illegal use of a controlled substance may interfere with the health or safety of staff.

BHP may use discretion in applying these policies prohibiting admission if the person demonstrates to BHP's satisfaction that the person is no longer engaging in illegal use of a controlled substance or abuse of alcohol and:

- a. Has successfully completed a supervised drug or alcohol rehabilitation program;
- b. Has otherwise been rehabilitated successfully; or
- c. Is participating in a supervised drug or alcohol rehabilitation program.

## NOTIFICATION TO APPLICANTS AND INITIAL PARTICIPATION

### A. Notification of Eligibility

BHP shall promptly notify eligible applicants of their eligibility. At this time, BHP will schedule the eligible applicant for the Section 8 Briefing.

### B. Notification of Ineligibility

Applicants determined to be ineligible will be notified in writing within ten (10) calendar days of such determination. BHP shall provide the applicant the opportunity for an Informal Review upon written request. The applicant must request such a hearing in writing within 10 days of the notification.

BHP shall schedule the Informal Review within 15 working days of the applicant's written request. At an Informal Review, the applicant may present factual information which might lead to reconsideration of the determination.

An Informal Review may be conducted by the Director of Housing Services or any HACB staff or non-staff person, (i.e. a hearing examiner) other than the person who made the determination, as directed by the Director of Housing Services or the Deputy Director.

## VI. SUBSIDY STANDARDS

- A. An applicant will be assigned a subsidy size appropriate for his/her family size and composition. The following standards guide the decision on the number of bedrooms appropriate to accommodate a family of given size and composition:

No. of Bedrooms	No. of Persons	
	Minimum	Maximum
0	1	2
1	1	2
2	2	4
3	3	6

B. The size of the subsidy will be assigned so that:

1. Spouses will be assigned the same bedroom; single heads of households will be assigned their own bedroom; co-applicants of the same sex may occupy the same bedroom.
2. Children under two years of age may occupy the same bedroom with parent(s).
3. Other than spouses (co-applicants), persons of the opposite sex over six years of age will not occupy the same bedroom, but two persons of opposite sex under six years of age may occupy the same bedroom.
4. For reasons of health (old age, disability, etc.) a separate bedroom may be provided for an individual family member if the reasons are plausible, are verified, and are supported by credible, expert opinion accepted by BHP.
5. Whenever possible the maximum limit per bedroom will prevail with funding available through BHP's current ACC (except in the situations listed above).
5. If the Head of Household loses custody of the minor children, the subsidy size will be determined in the following manner: At the time of recertification, if the children have been absent from the household for six consecutive months, then BHP will reduce the subsidy size to reflect the current household composition.
8. If more than one family member has custody of the children, the individual caring for the majority of the children or for a majority of the time will receive the benefit of being able to count the children towards the family's subsidy size. "Majority of the time" may also be determined by where the children are enrolled in the school.

9. A family member who is enrolled in school or college and not living with the family a majority of the year, will not be considered to be a part of the household for determination of subsidy size. "Majority of the time" is defined as more than six months in a year.
  
- C. Subsidy standards included in this plan are for Housing Choice Voucher issuance purposes. A family may rent a smaller size unit than stated on the Housing Choice Voucher as long as the unit complies with minimum housing quality standards. The family may rent a larger size unit as long as the unit complies with minimum housing quality standards and the rent limitations of the Housing Choice Voucher Program. The utility allowance, fair market rent limit, and voucher payment standard will match the actual bedroom size of the unit, not the bedroom size of the certificate or voucher.
  
- D. Participating families needing a different subsidy size in order to be in compliance with these subsidy standards will be given preference for the appropriate size over families on the waiting list. Participating families needing a different subsidy size will be given the appropriate size at the next annual reexamination or at the time the family moves.

## **VII. ISSUANCE OF SUBSIDY**

- A. **Issuance:**
  1. Eligible applicants will be issued a Housing Choice Voucher in a non-discriminatory fashion as their names come up on the waiting list. (See Attachment C for sample Certificate, Voucher, and Housing Choice Voucher documents.)
  2. Effective August 12 1999, all eligible applicants will be issued a Housing Choice Voucher.
  3. If the applicant refuses the offer of a Housing Choice Voucher, his/her name will be removed from the waiting list.
  4. Families will be notified by mail that a briefing will be conducted and that if they wish to participate in the program they must attend. The

families will be advised that if they do not attend the scheduled briefing and fail to contact the office regarding the missed appointment, their name will be removed from the waiting list.

**B. Briefings:**

After being determined eligible, applicants are required to attend a Section 8 briefing. At this briefing applicants will be issued the Housing Choice Voucher. Briefings will be conducted in a group setting whenever possible, depending upon the number of vacant subsidies available. The purpose of the briefing is:

- To acquaint the families with the operation of the Housing Choice Voucher programs.
- To provide the eligible applicant with the tools necessary to successfully become participants.
- To give the eligible families a Housing Choice Voucher packet containing all the required information and documents.
- To provide a full explanation of the program and program requirements by an occupancy specialist.
- It will be made clear to all applicants that the Housing Choice Voucher will expire at the end of 60 days and that they must successfully complete their housing search within that time.
- HACB is required to provide prospective landlords with the name and phone number of an applicant's current and previous landlord, if known. BHP chooses to not provide any additional information.

**C. HACB Jurisdiction**

The jurisdiction of the Section 8 program for BHP is the city of Boulder. An intergovernmental agreement executed on May 29, 1987, among BHP, the Boulder County Boulder Housing Partners and the Longmont Boulder Housing Partners allows each agency reciprocal authority to enter into

contracts with owners and/or managers of rental units within each other's jurisdictions. Therefore, BHP may work with any landlord in Boulder County.

Portability procedures do not apply within the shared jurisdiction.

**D. Submission of the Request for Lease Approval**

1. Only one request for lease approval may be submitted to BHP at a time.

**E. Extensions**

An eligible applicant will have 60 days to locate suitable housing with the Section 8 programs. A Housing Choice Voucher will only be extended under the following circumstances:

1. If the family can verify extenuating circumstances.  
Examples of extenuating circumstances:
  - a. To accommodate a disability
  - b. For a hard-to-house family
  - c. Verified medical reason - i.e. hospitalization
  - d. Other documentation that demonstrates that they have made every effort to secure a suitable unit, based on contact with Section 8 staff.
2. The family has not refused a suitable unit without good cause.
3. There is a reasonable possibility that an extension of the Housing Choice Voucher will result in the execution of a Housing Assistance Payments (HAP) Contract.
4. BHP has discretion as to what constitutes acceptable verification of the extenuating circumstances, good cause, and the reasonable possibility of the family locating an approvable unit resulting in a signed HAP Contract.

**G. Exception Rents**

BHP will approve exception rents as a reasonable accommodation for persons with disabilities on a case-by-case basis. BHP can approve an exception rent for up to 20% over the Boulder County FMR.

#### **H. Certificate Fair Market Rents and Voucher Payment Standard**

1. Fair Market Rent: The Fair Market Rent (FMR) applies to the Section 8 certificate program. The FMR is established by HUD every year at the beginning of the federal fiscal year (October 1). As of December 31, 2001, the certificate program will no longer be administered due to the switch to the Housing Choice Voucher program.
2. Payment Standard: The payment standard applies to the voucher program and the Housing Choice Voucher program. The payment standard may equal the current FMR. The payment standard will be established between 90%-110% of the FMR. The payment standards will be reviewed annually upon release of the FMR and updated if necessary.

Review Procedures: HACB staff will compare the rent burden being paid by all participants of the Section 8 program. If the average of the rent burden is greater than 30%, then BHP will determine to raise the payment standard to equal the FMR.

3. A new payment standard will be utilized for purposes of rent calculation upon annual recertification.
4. The annual adjustment factor, published by HUD and effective October 1<sup>st</sup> of each year will be utilized to adjust the rental amounts for any remaining certificate program participants.

### **VIII. LEASING OF DWELLING UNITS**

#### **A. Security Deposits:**

All HAP contracts executed on or after December 1, 1995 will require that

participants pay the owner's normal and reasonable security deposit. There will not be any damage/vacancy reimbursements for contracts signed after December 1, 1995. All old contracts will be honored as long as they are in effect. A separate Pet Deposit may be collected at the owner's discretion.

**B. Lease Term:**

The initial lease term for a participant must be for a minimum of 12 months. The initial lease term applies any time a resident moves. There is no longer an endless lease requirement to the Section 8 program.

**C. Lease Form and Content:**

BHP approves all leases and screens the lease to ensure that the lease does not contain language that is not consistent with state and local law, and that apply generally to unassisted tenants in the same property. The HAP contract and the lease must contain the HUD prescribed tenancy addendum.

**D. Rent Burden**

A Section 8 participant may not lease a unit that would cause the participant to bear a rent burden of more than 40% of his/her monthly income. This applies only at initial lease up of a unit and if the participant moves to a new unit.

**E. Types of Housing:**

1. Eligible Housing

Almost any type of existing rental housing may be utilized under all of the Section 8 Programs provided it meets Housing Quality Standards, the Contract Rent is reasonable, and the Gross Rent (except for Vouchers) falls within the appropriate FMR limitations. FMR's, Payment Standards and utility allowances will be adjusted according to HUD regulations by special housing type.

2. Limited Housing Options

Limitations as described below, are placed on the use of the following types of housing to be utilized by Section 8 programs:

- a. Congregate housing, if utilized by the elderly/disabled.

- b. Independent Group Residences, if utilized by elderly/disabled. Must be state approved. No more than 12 occupants.
  - c. Single Room Occupancy (SRO), if utilized by elderly/disabled and supportive services are provided by an agency partner. May not be owner occupied. BHP will use the 0 bedroom payment standard to determine unit subsidy.
  - d. Space Rent for Manufactured Housing, if program requirements are met.
3. Ineligible Housing
- a. BHP will not allow a participant to rent shared or cooperative housing unless it is necessary to accommodate a person's disability.
  - b. BHP may not provide assistance for nursing homes.
  - c. BHP may not provide assistance for a unit that is owned by a participant's family member, unless requested as a reasonable accommodation.
  - d. Refer to property requirements on page 29.

**F. Utility Allowances:**

BHP adopts the same utility allowances as established in Boulder County. The applicable schedule of allowances will be reviewed annually for any necessary adjustments. Adjustments will be made if any given utility (for example—electricity) has increased by more than 10% since the last adjustment.

The utility allowance reflects the cost of utilities according to the unit size, structure type, and fuel type. The allowances are based on energy consumption averages for the community as a whole. BHP will reimburse the family for Utility Allowances which are over and above the Tenant

Payment. A check will be issued jointly to the family and to the utility company.

**G. Property Requirements:**

1. Rental License

Rental property in the City of Boulder is required to have a rental license. In order to have a rental license, the property must be in compliance with the City of Boulder Housing code, which establishes minimum health, safety, and maintenance standards for housing in Boulder. Before executing a HAP Contract on behalf of a family, HACB staff will request rental license information from the landlord/owner and the City Rental License Department when necessary. This information will be documented in the file. (Per Board Resolution #16 of 1989.)

2. Housing Quality Standards:

Policy: BHP will follow the requirements for minimum housing quality standards as stated in the 24 Code of Federal Regulation and the Section 8 Administrative Practices Handbook, 7420.7. BHP Housing Assistance Payments will be *abated* for a unit which fails to meet HQS until the landlord/owner corrects the defects and BHP verifies the corrections.

Procedure: BHP will schedule HQS inspections within 15 days of receipt of the Request for Lease Approval. BHP may use contract inspection services to complete HQS inspections.

**H. Rent Reasonableness**

Rent reasonableness determinations are made when units are placed under HAP contract for the first time and when owners request annual or special contract rent adjustments.

Rent reasonableness is determined by researching current rental costs through contact with owners, property managers, from newspapers, realtors, professional associations, and apartment guide information. BHP will survey landlords annually to determine baseline information. Surveys will be

distributed with rent checks. Other sources of information for determining rent reasonable include, but are not limited to, the Denver Metro Apartment Guide and internet resources.

BHP will maintain a market comparability notebook for rent comparison testing. BHP will make a determination as to the reasonableness of the rent the owner is requesting in relation to comparable units on the private unassisted market.

The following items will be used for rent reasonableness documentation:

- Unit type
- Number of Bedrooms
- Location
- Quality
- Amenities
- Facilities

As a minimum, one comparable unit will be used for each new contract executed.

Shared Housing Rent Reasonableness will be determined by comparable "Rooms for Rent" in the newspaper.

**IX. Landlords and Owners**

- A. Housing Assistance Payments  
BHP will make HAP payments to owners and landlords the first of the month. BHP will pay late fees to the landlord or owner if a delay in payment is the fault of BHP.
- B. **Owner Screening**  
BHP may reject an owner with a history or practice of violating Section 8 HQS or applicable housing standards under the Section 8 program or other federal programs.
- C. The "Take-One, Take-All" requirement for owners has been eliminated.
- D. **Outreach**

BHP encourages landlords/owners to participate in the Section 8 program. BHP does outreach to new landlords through marketing brochures and targeted conversations with potential or interested landlords. BHP also sends periodic thank-you letters to current landlords. Staff considers all landlord questions and concerns as a high customer service priority.

**X. PORTABILITY**

**A. ~~Portability~~– ~~Out-Going~~**

Families moving in or out of BHP’s jurisdiction are considered portable families. BHP will allow families to move to another locality and continue their rental assistance as long as:

1. The family currently lives in the Contractor’s jurisdiction and holds a valid certificate or voucher.
2. The participant must lease up with his/her Certificate, Voucher, or Housing Choice Voucher in the city of Boulder for 12 months, if the family did not reside or work in the city of Boulder when the family got to the top of the waiting list.
3. The participant is income eligible in the area where the family wants to lease a unit.
4. The family has not violated the Family Obligations as listed in Addendum A.
5. The participant is current on any repayment agreements with BHP.

**B. ~~Portability~~– ~~In-Coming~~**

BHP will accept in-coming portable section 8 participants under the following circumstances:

1. The incoming portable participant must have a valid Section 8 subsidy from another jurisdiction and BHP has had contact with the initial PHA.

2. All incoming portable families will be given a copy of the briefing package. The briefing should be scheduled at the next group briefing or within 15 working days.
3. BHP may recertify the family composition and income of the family. In order not to delay the participant's assistance, BHP may use the initial PHA's 50058 Family Report for an initial income determination.
4. If the family's income exceeds the income limit for Boulder County, the participant will be denied assistance.
5. BHP will attempt to absorb incoming portables within six months of the participant signing a HAP contract in the city of Boulder.
6. HACB will only administer incoming portables that lease within the city of Boulder.

## **XI. METHODS OF VERIFICATION**

### **A. Family Composition:**

Copies of birth certificates will be required as proof of family composition. In addition, BHP may elect to ask the applicant/participant to provide copies of other documents such as Income Tax Returns, School Records, Marriage Certificates, Divorce Actions, VA Records, or Support Payment Records if BHP determines that there is reasonable doubt as to the family's composition.

### **B. Verification of Income and Assets:**

1. Written, third party verification will be BHP's preferred mode of verifying a family's income and assets for the purpose of determining or redetermining eligibility for the Section 8 program.
2. The second preferred form of verification will be oral, third party verification documented to file.

3. The third preference will be documents provided by the Applicant/Participant (i.e. copies of paycheck stubs, W-2 forms, income tax statements, award letters, or current bank statements). If all these methods fail, BHP may accept a notarized or signed statement provided by the Applicant/Participant.

In the cases of #2 and #3, a written, third party verification is still expected, but the processing of a certification or recertification can proceed with the information from the second and third preferred forms of verification.

4. In the case of fluctuating income or self-employment, verification procedure and rent calculations are outlined on page 39 Section C2, "Fluctuating Income".
5. In the case of a zero income household, the participant will be required to provide verification on a monthly basis of how basic household needs are met.

**C. Verification of Medical Expenses**

In order to receive a medical deduction, the treatment must first be verified by a qualified physician or therapist. Medical deductions may include, but are not limited to:

1. The cost (after insurance) of any ongoing therapy or treatment, the cost (after insurance) of any ongoing prescriptions or over-the-counter medications or supplements that are being prescribed by a physician.
2. The balance (after insurance has paid its portion) of any medical bill that the Applicant/Participant anticipates they will pay during the next twelve month period.
3. Copies of prescriptions and bills will be accepted to verify cost.
4. Medicare costs may be verified by the Department of Social Security.
5. Home care costs may be verified by the provider, the Department of Social Services, or paid receipt.

**D. Verification of Family Type:**

1. Disabled or handicapped applicants/participants must have the disability or handicap verified in accordance with HACB policies and federal regulations by a qualified physician or therapist, if appropriate.
2. Full time students over the age of 18 who are attending an educational institution with a diploma, certificate or degree program must obtain written verification from a school official in order to qualify for the dependent deduction.

**E. Verification of Social Security Numbers:**

1. Copy of social security cards.
2. Print out from SSA of social security number.
3. Third party verification from an agency paying benefits to the family.
4. Certification from client of the social security number they have been issued.

**XII. DETERMINATION OF RENTAL PAYMENTS (Applicable to both Applicants and Residents)**

**A. Definition of Total Family Income and Assets**

1. Total family income includes anticipated total income from all sources received by the family head and spouse (even if temporarily absent), and by each additional member of the family, including all net income derived from assets income anticipated for the twelve (12) month period following the effective date of the initial determination or reexamination.
  - a. Income includes, but is not limited to the following:
    - (1) Gross amount of wages and salaries, overtime pay, commissions, fees, tips, and bonuses, and other compensation for personal services;

- (2) Net income from operation of a business or profession;
- (3) Interest, dividends and other net income of any kind from real or personal property (where net Family Assets exceed \$5,000 annually, see paragraph 3 below);
- (4) Full amount of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits;
- (5) Unemployment, disability compensation, worker's compensation and severance pay;
- (6) Welfare Assistance;
- (7) Alimony, child support payments and regular contributions or gifts received from persons not residing in the dwelling;
- (8) All regular pay, special pay and allowances of a member of the Armed Forces (whether or not living in the unit, who is head or spouse or other person whose dependents are residing in the unit);

2. Annual Income does not include:

a. Sporadic income that is temporary, or of a non-recurring nature including the following:

- (1) Sporadic gifts;
- (2) Amounts reimbursed for the cost of medical expenses;
- (3) Lump sum assets such as inheritances, insurance payments, one time lottery winnings, or SS or SSI delayed payments;

- (4) Portions of educational scholarships provided for tuition, fees, books, equipment, materials, supplies, transportation and miscellaneous personal expenses
- (5) Hazardous duty pay of a family member in the Armed Forces;
- (6) Hostile Fire/Imminent Danger Pay;
- (7) Holocaust reparation payments;
- (8) Earnings in excess of \$480 for each full-time student who is not head of household or spouse;
- (9) Adoption assistance payments in excess of \$480 per adopted child;
- (10) Earnings/benefits from public funded employment training and supportive services;
- (11) Refunds or rebates for property taxes on dwelling units;
- (12) Amounts paid by the State to offset costs of keeping a developmentally disabled member at home.

b. Other income not used in determining Annual Income:

- (1) Income from employed children (including foster children) under the age of 18 years;
- (2) Payment received for care of foster children;
- (3) Relocation payments paid under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970;
- (4) Allotments received for coupons under the Food Stamp Act;

- (5) Payments to volunteers under the Domestic Volunteer Service Act of 1973;
- (6) Payments received under the Alaskan Native Claim Act;
- (7) Income from land in trust for certain Indian Tribes;
- (8) Payment of allowances for Federal Energy Assistance Program;
- (9) Amounts received from programs funded in whole or in part under the Job Training Partnership Act;
- (10) Settlement claim funds of the Grand River Band of Ottawa Indians;
- (11) The first \$2,000 of per capita share awarded from Court of Claim or Indian Tribes;
- (12) Amounts received from training programs funded by HUD;
- (13) Amounts received by a disabled person that are disregarded in determining supplemental security income eligibility and benefits because they are set aside under a plan to achieve self-support (PASS programs);
- (14) Amounts received to cover out-of-pocket expense necessary to participate in a publicly-assisted program;
- (15) Income of a live-in aide;
- (16) Payments made to individuals under Title V of the Older Americans Act;
- (17) Earned Income Tax Credit Refunds;
- (18) Reimbursement costs under the Child Care and

Development Block Grant Act of 1990;

(19) Agent Orange Settlement Fund payments;

(20) Grants/Scholarships under Title IV of the Higher Education Act of 1965;

(21) Maine Indian Claim Settlement of 1980.

2. Net Family Assets include: cash, stocks, bonds, savings, value of equity in real property, and other forms of capital investments excluding the cost that would be incurred in disposing of the assets (excluding personal automobile and household furnishings).

a. Any income distributed from a trust fund shall be included in determining annual income.

b. Any assets disposed of for less than fair market value will be included if disposed of two (2) years preceding the date of application or reexamination.

c. When the family has Net Family Assets in excess of \$5,000, Annual Income shall include the greater of the actual income derived from all Net Family Assets or a percentage of the value of such assets based upon current passbook savings rates as determined by HUD.

d. Applicants or residents who have assigned, conveyed, transferred or otherwise disposed of any asset and retained any legal interest therein, shall have the value of such assets based upon current passbook savings rates as determined by HUD.

e. In all cases it shall be the responsibility of the applicant or participant to provide the necessary documentation to establish the legal ownership of equity in any assets.

## **B. Adjusted Income**

Adjusted income means Total Family Income minus the following:

1. \$480 for each member of the family residing in the household, (other than the head of household or spouse) who is under 18 years of age or who is 18 years of age or older and is disabled, handicapped or a full-time student.
2. \$400 for any elderly head of household.
3. Medical expenses in excess of 3 percent of annual family income for any family with an elderly or disabled head of household.
4. Non-reimbursed child care expenses to the extent necessary to enable another member of the family to be employed or to further their education. The amount deducted shall not exceed the amount of income received from such employment. (This provision applies only to child care for children under 13 years of age.)
5. Handicapped assistance expense in excess of 3 percent of annual family income to the extent it is required for apparatus or attendant care for a handicapped member of the family, the combined medical expense and handicapped assistance expense in excess of 3 percent of annual family income will be deducted.
6. Un-reimbursed medical expenses for non-disabled/non-elderly families who have a handicapped family member if the deduction enables the handicapped person to be employed.
7. Child support payments of up to \$480 per child per year who do not reside in the assisted household.
8. Alimony payments of up to \$550 per year.

**C. Total Tenant Payment**

1. Total Tenant Payment is the monthly amount calculated

determined by the following:

- a. Total Tenant Payment shall be the highest of the following:
  - (1) 30 percent of monthly adjusted income (1/12 of annual adjusted income), or
  - (2) 10 percent of monthly gross income, or
  - (3) \$50 Minimum Rent.
  - (4) Pro-Rated Rent based on INS non-citizen rule
  
- b. Procedures for Pro-Rating assistance
  - (1) Determine Total Tenant Payment (TTP).
  - (2) Determine the Housing Assistance Payment (Contract Rent minus the TTP)
  - (3) Multiply the HAP amount by the fraction of eligible members in the family--the top number (numerator) is the number of eligible members and the bottom number (denominator) is the total number of family members.
  - (4) The result of #3 is the pro-rated HAP amount for the family.
  - (5) Subtract the pro-rated HAP from the Contract Rent to determine the family's rent.

**Example**

6 Family Members: 4 eligible, 2 not-eligible

TTP = \$200

Contract Rent = \$800

HAP = \$600

Step One: Multiply the HAP by the number of eligible family members/total family members. ( $\$600 \times 4/6 =$

\$400) \$400 equals the pro-rated HAP.

Step Two: Subtract the pro-rated HAP from the Contract Rent. ( $\$800 - \$400 = \$400$ )

**Pro-Rated Rent equals \$400.**

2. Fluctuating Income - When the family's income fluctuates or the family is self-employed, BHP will determine the Applicant/Participant's rent by estimating an average monthly income, projecting this amount for the ensuing 12 month period, and calculating the monthly rental payment based on the projected annual amount. When the Participant can provide acceptable verification of "net income from a business," this amount will be used to determine the applicant/participant's rent.
3. The Housing Choice Voucher eliminates the "shopping incentive" of the voucher program. If a Section 8 participant leases a unit at a rent less than the payment standard, rent for the participant is determined by Section #1, above.

D. Mobile Home Pad Calculation

As of August 12, 1999, BHP will use 30% of the 2 bedroom FMR to calculate the portion of the pad space rent to be paid by the participant. The rent calculation will not take the participant's mortgage payment into consideration.

### **XIII. RECERTIFICATION**

Annually, from the first of the same month in which the lease was signed, and at interim periods as circumstances may prescribe, the tenant will furnish information and certifications to BHP as to family income, employment, and family composition, for use by BHP. The annual recertification date will be used for determining if the rent should be changed and if the dwelling unit size is still appropriate for the tenant's needs.

- A. The income and continued eligibility of all families is to be reexamined at least every 12 months and the tenant's portion of the rent will be adjusted accordingly. As part of the reexamination process, or at any time during

occupancy it is deemed necessary, BHP will examine the following aspects of continued eligibility:

1. Participants shall complete an Application of Recertification for continued participation.
  2. If not already documented in resident file, families shall disclose and verify Social Security numbers for all family members who are at least six (6) years of age.
  3. Employment and income data will be verified, and all verified findings will be documented and placed in the participant's file.
  4. Families will be required to sign a certification that all information submitted for rent determination is true and accurate.
- B. Eligibility information will be verified and analyzed with respect to the following:
1. Size of unit required for the family.
  2. Rent that the family will pay.
- C. At the time of annual recertification the family must have not falsified any information supplied to BHP in the application process or falsified information supplied during any recertification process during the past two years in connection with any other federally subsidized housing program.
- D. If the family fails to meet its scheduled deadlines to submit the requested data or sign the recertification document(s), BHP will notify the family that BHP proposes termination of the family's assistance for failure to comply with the recertification process.
- E. Tenant rent as fixed at time of move-in will remain in effect unless any of the following occur:
1. A change of income occurs which results in a decrease in rent. All changes must be reported to BHP in writing within ten (10) days of its occurrence.

2. A change in family composition must be reported in writing within ten (10) days of the date of the change.
3. If it is found that the tenant has misrepresented the facts upon which rent is based, and the tenant is paying less than they should have been charged, then the increase in rent will be made retroactive to the time the increase should have occurred. Payment arrangements must be made with BHP or termination of assistance may occur.
4. If at the time of admission or reexamination, due to unusual circumstances, projected annual income cannot be determined with any reasonable degree of accuracy, a temporary rent for a specified period not to exceed 90 days may be established. At the expiration of the specified period, or such earlier time that the income becomes stable, a new rent will be established.

F. In the case of an interim reexamination and the rent decreases, the adjustment will become effective the first of the following month after the month it is reported if the change is reported by the 20<sup>th</sup> of the month. If the change is reported after the 20<sup>th</sup> of the month, then the decrease will take effect the first of the second following month.

In the event of an income increase of \$250 or more per month, an interim rent change will be processed.

#### **XIV. MISREPRESENTATION**

The participant is to be notified, in writing, of any misrepresentations or program violations revealed through reexamination, rent review, or other occurrences.

The applicant/tenant certifies that accurate information has been provided on family composition, income, net family assets, allowances and deductions. Any misrepresentation is considered to be a violation of Federal regulations and may result in program termination, applicant denial and/or punishment under Federal

Law.

Allegations, complaints, or other observations that indicate a family is receiving more benefits than it is entitled to receive will be investigated by BHP. After verification of these misrepresentations, BHP will take all necessary steps to recover the un-entitled payments including administrative actions, or civil or criminal court actions, as it deems appropriate

If it is found that the Participant has misrepresented to BHP the facts upon which their rent is based, or has failed to report an increase in income as required by this section, so that the rent they are paying is less than they should have been charged, then the increase in rent will be made retroactive to the effective date of the increased income.

BHP may also elect to terminate housing assistance for cases of substantial or repeated misrepresentation of income, fraud, or family composition. Furthermore, such cases may be turned over to the Office of the Inspector General at HUD for legal action.

## **XV. NOTIFICATION OF RENT ADJUSTMENT**

- A. In the event of any rent adjustment BHP will notify the participant by mail.
- B. In the case of rent decreases, the adjustment will become effective the first day of the month following the notice.
- C. In the case of rent increases, the adjustment will become effective the first day of the second month following the Notice. If the rent increase results from a finding of intentional or negligent representation, non-disclosure, or failure to supply requested information, BHP may give less than 30 days notice.
- D. When there is an overpayment of rental assistance, the full amount will be due to BHP and will be due after the Section 8 Notice is mailed to the tenant. A nine month pay-back agreement may be negotiated at BHP's discretion. Only one pay-back agreement will be offered to a participant. In a second

instance of overpayment of rental assistance, the total amount will be due. In a third instance of overpayment of rental assistance, BHP will propose termination of the tenant's participation in the Section 8 program and the total amount will be due.

- E. BHP will propose termination of participation in the Section 8 Program if a Participant misses 3 consecutive months of payments on the Payback Agreement.

## **XVI. UNIT TRANSFERS**

- A. Participants may move to a new unit if:
  - 1. The participant has completed the initial 12 month lease term.
  - 2. The assisted lease for the old unit has terminated because:
    - a. BHP has terminated the HAP contract because of an owner breach of contract.
    - b. The tenant has given notice of lease termination (if the tenant has the right to terminate the lease on notice to the owner).
- B. BHP requires the participant to give a 30 day prior written notice to BHP and the owner. The notice or mutual rescission of lease or lease termination must end tenancy on the last day of a month.
- C. The family will be required to attend a moving briefing meeting in order to receive updated information regarding program Fair Market Rents/Payment Standards, and a Request for Lease Approval form.
- D. Participants who owe BHP money or who are repaying money in accordance with a repayment agreement will not be allowed to exercise portability until the debt is paid in full.
- E. BHP prohibits any moves during the initial year of assisted occupancy; and prohibits more than one move by the Participant during any one year period.

This includes families outside the PHA jurisdiction under portability procedures.

- F. BHP may begin a new assisted lease during the month a family moves and may pay an overlap with the housing assistance payment.
- G. The family will have sixty (60) days to find a new unit. The certificate or voucher will be issued on the first day of the last month of the lease.
- H. The family may not be absent from the assisted unit for a period of more than 30 calendar days. Written requests for extensions of this limit due to hospitalization, attendance in a rehabilitation program, and family emergencies will be considered and require verification.
- I. BHP requires the family to notify BHP before it moves out of an assisted unit. BHP will use the following means to determine whether a family is actually living in, has moved out of, or is otherwise absent from the unit:
  - 1. Mailing letters to the unit
  - 2. Phone calls
  - 3. Scheduled Inspections
  - 4. Questions to the landlord or neighbors, and
  - 5. Missed appointments.
- J. When a participant moves to a new unit after August 12, 1999, the participant will be issued a Housing Choice Voucher. Once issued a HCV, the participant may not, by regulation, lease a unit that creates more than a 40% rent burden. In addition, the HCV eliminates the "shopping incentive" for Section 8 participants.

**XVII. INCLUSION OR EXCLUSION OF HOUSEHOLD MEMBERS OR MEMBERS AS PART OF A RESIDENT FAMILY**

**A. Approval of New Family Members**

- 1. Each Participant will notify BHP management in writing in advance of their desire to have a new family member reside with the Section 8 participant in its dwelling unit. For purposes of this regulation, "new

family member" means any person who is not listed as a household member in the lease and who plans to reside in the assisted unit.

2. Additions of new family members over 18 years of age –
  - a. Before the new family member may reside with the Participant family, the new family member must meet all the HUD eligibility requirements. If he/she meets these requirements, the rent will be appropriately adjusted to reflect the new family member's income, and the new family member will be added as a household member and may reside with the Participant family in its assisted dwelling unit. If the subsidy size is not appropriate, BHP will issue the family the appropriate size subsidy at the time of its next annual recertification if funds are available.

As a result of the reexamination of income due to the addition of a new family member, the family's rent will be adjusted only to the extent that the income and expenses or allowable deductions of the proposed new family member affects the family's Monthly Adjusted Income.

- c. If the proposed new family member fails to meet the eligibility/participant selection criteria, or fails to submit documentation for BHP to determine eligibility, the proposed new family member will not be added to the lease as a household member and may not reside in the assisted unit.
3. Live-In Aide and Foster Children
  - a. The family must obtain approval from BHP for occupancy by a live-in aide or a foster child.
  - b. In the case of a Live-In Aide when the aide is not a member of the family, the aide will not be listed on the lease as a

household member. The aide is considered an employee, and, therefore, the aide's income does not contribute to the household to be calculated as part of the rent. Approval is contingent on criminal history background check.

- c. When the assistance of the program participant terminates, the Live-In Aide and foster children have no further rights to remain in the unit or to retain the housing subsidy.

**B. Family Break Up/Family Composition Changes**

1. The family must promptly notify BHP if any family member no longer resides in the dwelling unit.
2. BHP will use the following criteria to determine who keeps the Section 8 subsidy after a family break up:
  - a. When minor children are involved, the family member with custody of the children will retain the assistance.
  - b. If the Head of Household loses custody of the minor children, the subsidy size will be determined in the following manner: At the time of recertification, if the children have been absent from the household for six consecutive months, then BHP will reduce the subsidy size to reflect the current household composition.
  - c. If more than one family member is awarded custody, the individual caring for the majority of the children or for a majority of the time will receive assistance. "Majority of the time" may also be determined by where the children are enrolled in the school.
  - d. A family member who is enrolled in school or college and not living with the family a majority of the year, will not be considered to be a part of the household for determination of subsidy size. "Majority of the time" is

defined as more than six months in a year.

- e. If joint custody is an equal venture, the family member listed on the application as the Head of Household will retain the assistance the Section 8 assistance.
- f. When no children are members of the household, the original Head of Household listed on the application for Section 8 assistance and keep the Section 8 assistance.
- g. When a court determines the disposition of property between members of the assisted family in a divorce or separation under a settlement or judicial decree, BHP is bound by the court's determination of which family member continues to receive assistance in the program.

#### **XVIII. DAMAGE CLAIMS (See Addendum A)**

#### **XIX. TERMINATION/DENIAL OF ASSISTANCE**

BHP reserves the right to propose denial or termination of program participation to any applicant or program participant for the following reasons

- A. Families who owe rent or fees to this or any other Boulder Housing Partners or assisted project.
- B. Families who willfully misrepresent income, assets or other important data which is required in the administration of federally assisted housing programs.
- C. Families who have not reimbursed claims paid on its behalf by BHP to a Section 8 landlord either for rent, damages or vacancy claim, and for families who have breached an agreement to repay BHP for such claims.
- D. Families who fail to fulfill their obligations under the Section 8 program's

Family Obligations.

- E. Former tenants of BHP or any other assisted housing program who have committed fraud or misrepresentation of income or other important data during the Certification and Recertification process and who fail to report changes (when such changes would result in a lower Housing Assistance Payment) in income or family composition during their tenancy.
- F. BHP may deny or terminate assistance if the family has engaged in or threatened abuse or violent behavior toward any member of BHP's staff or its contracted agents.
- G. The family may not be absent from the unit for more than 30 days without HACB approval. HACB approval of extended absences in excess of 30 days will only be given for extenuating circumstances, such as extended hospitalization or rehabilitation, medical treatment, or care of a family member. Requests will be reviewed on an individual basis.
- H. Failure to supply true and complete information for any initial, interim, or annual certification of eligibility.
- I. Unauthorized individuals living in the subsidized unit without HACB approval.
- J. Violation of any family obligation (Addendum B).
- K. Engaging in drug related or violent criminal activity as defined in 882.118(B)(4) or 887.401(B)(5) and illegal drug use and alcohol abuse per PIH 96-27. Specifically, BHP will deny access to the Section program if the family has been arrested or convicted of a felony in the past five years, or if the applicant has been arrested for three or misdemeanors in the past five years.
- L. The refusal to allow BHP to inspect the unit.
- M. Moving without giving BHP and the landlord a written 30 day notice.

- N. The family's failure to notify BHP of the birth, adoption or court awarded custody of a minor.
- O. Failure to notify BHP within 10 days if any family member no longer lives in the unit.
- P. Failure to give BHP a copy of any owner notice for compliance or possession, or any eviction notice.
- Q. Any serious or repeated violation of the lease that is documented by the landlord. (Including inadequate, unsanitary, or unsafe housekeeping practices.)
- R. Moving from the unit without fulfilling the initial 12 month lease term.
- S. No housing assistance payments are made for 180 days.
- T. The participant does not reside in the assisted unit, or does not use the assisted unit as the participant's only residence.
- U. The repeated failure to pay for any tenant supplied utilities.
- V. The participant's failure to notify HACB at the time of admission of any drug related criminal activity.

## **COLLECTION POLICIES**

In the interest of sound fiscal management and program integrity, BHP will make all efforts to collect amounts owed the agency as a result of unreported income or amounts paid to owners on behalf of participants. The following procedures will be followed to ensure maximum collection of applicant/participant debt:

### **A. Applicants:**

No applicant will be admitted to the Section 8 program until any/all debts owed BHP have been paid. The applicant's name may be placed on the waiting list as a potentially eligible applicant, but no Certificate/Voucher will be issued until all debts are paid in full.

B. Participants:

Participants in the Certificate/Voucher Program must agree to pay back any amounts owed BHP in order not to jeopardize their continued assistance. The following procedures will be followed to collect money due to BHP for Section 8 program participants.

1. Unreported income:  
A limited payback arrangement *may* be negotiated, once the amount of overpayment of housing assistance payments has been established. A payback agreement will be executed based upon the financial circumstances of the family. The agreement will ensure that the full amount of the overpayment is reimbursed to BHP within 12 months of the date the family was notified of the indebtedness.
2. Payments of Damages/Vacancy Loss (*applies only to HAP contracts executed prior to 12/1/95*):  
Every effort will be made to determine the extent of damages/vacancy loss before a new lease is approved or HAP Contract is executed on behalf of a participant. The following policies are established in order to reduce participant indebtedness:
  - a. It is the policy of BHP that owner claims for unpaid rent, damages and vacancy loss must be submitted to the office within 60 days of the date the family vacated the unit. Additionally, the owner must comply with the provisions of the lease and State and local law relative to the return of security deposits or the claim will be denied by BHP.
  - b. If a new HAP Contract has not yet been executed in the participant's behalf, a payback agreement will be negotiated with the family before a new contract is executed. If the family refused to negotiate a payback agreement, no new HAP contracts will be executed and assistance will be terminated in accordance with program regulations and this Administrative Plan.

- c. If a new Housing Assistance Payments Contract has been executed in the family's behalf, every effort will be made to negotiate a payback agreement. Should the participant refuse to negotiate a payback agreement, they will be refused a new Certificate/Voucher until the indebtedness is paid.
  - d. If the family is willing to execute a payback agreement, payments may be established to ensure that the entire debt is paid in full before the end of the initial term of the current contract. Should the family fail to make payments as agreed, BHP will propose termination of housing assistance.
  - e. If the family fails to make regular payments for 3 consecutive months without good cause, BHP will propose termination of the housing assistance.
  - f. Payments are due to BHP on the first of the month. The family will be charged a \$25.00 late fee if the payment is not received by 5:00 pm on the 5<sup>th</sup> of the month.
2. In addition to the action prescribed in this section, BHP will pursue collection of all debt through the judicial system in order to secure judgement and enhance the potential for collection. This action will be taken on a case-by-case basis when it is deemed most prudent.

## **XX. INFORMAL HEARINGS**

BHP is not required to grant a hearing for any discretionary administrative decisions or for general policy issues or class grievances. A hearing is not required to validate BHP's determination not to approve an extension or suspension of the certificate or voucher term.

The family possesses the right to a pre-hearing discovery of HACB documents, including records and regulations that are directly relevant to the hearing. The family reserves the right to request these documents at any time regardless of hearing status. BHP may devise appropriate procedures for inspection of documents, including provision for supervised inspection. BHP is not required to allow the family or

family's representative to remove documents or files from BHP offices. These documents will be made available for the fee of 25¢ for each page of each document copied.

**A. Informal Review Procedures for Applicants--Please Review to Applicant Selection Process**

**B. Informal Hearing Procedures for Participants**

BHP will provide the opportunity for an informal hearing for Participants on the following items:

1. Determination of the family's income.
  2. Determination of the family unit size for the family under HACB subsidy standards.
  3. Determination of appropriate utility allowances for the family from BHP utility allowance schedule. HACB is not required to grant a hearing on establishment or accuracy of BHP schedule of utility allowances for families in the program. BHP must grant a hearing on BHP determination, based on the individual family circumstances, of the appropriate utility allowance for the particular family from BHP utility allowance schedule
1. The determination to deny or terminate any assistance because of family actions that violate the family obligations.
  2. The determination that a participant's unit is too big for the current family size and continued assistance under the Section 8 Certificate Program BHP must grant an advance hearing before terminating payments under an outstanding HAP contract in these three cases:
    - a. A determination that a certificate program family is residing in a unit with a larger number of bedrooms than appropriate for the family unit size under BHP subsidy standards, or BHP determination to deny the family's request for an exception from the standards.

- b. A determination to terminate assistance because of the family's action or failure to act.
- c. A determination to terminate housing assistance payments because the participant family has been absent from the assisted unit for longer than the maximum period permitted under HACB policy and HUD rules.

**C. Hearing Officer**

A hearing may be conducted by any person or persons designated by BHP, other than a person who made or approved the decision under review or a subordinate of this person.

## **ADDENDUM A      FAMILY OBLIGATIONS**

### **SECTION 8 STATEMENT OF RESPONSIBILITIES AND OBLIGATIONS BOULDER HOUSING PARTNERS OF THE CITY OF BOULDER**

This information sheet has been created in order to help you avoid any program violations that could result in the termination of your housing assistance. Please read this information carefully and check with your Occupancy Specialist if you have questions.

I understand that I may risk losing my housing assistance or the Boulder Housing Partners City of Boulder, (HACB), may refuse to approve a new lease, or sign a new housing contract on my behalf if I or any household member fails to comply with the following:

#### **THE FAMILY MUST:**

- 1) Provide written third-party verification of any change in money that their household receives. The verification must be provided to BHP within 10 days of the change.
- 2) Provide notification of either employment status or student status when any child in the household turns 18 years of age.
- 3) Supply any information that BHP or HUD determines to be necessary, including evidence of citizenship or eligible immigration status, and information for use in a regularly scheduled annual reexamination or interim reexamination of family income and composition.
- 4) Disclose and verify social security numbers and sign and submit consent forms for obtaining information.
- 5) Supply any information requested by BHP to verify that the family is living in the unit or information related to family absence from the unit.
- 6) Promptly notify BHP in writing when the family is away from the unit for an extended period of time in accordance with HACB policies.
- 7) Allow BHP to inspect the unit at reasonable times and after reasonable notice.
- 8) Notify BHP and the owner in writing before moving out of the unit or terminating the lease with a written, 30 day notice.
- 9) Use the assisted unit for residence by the family. The unit must be the family's

only residence.

- 10) Promptly notify BHP in writing of the birth, adoption, or court-awarded custody of a child.
- 11) Request HACB written approval to add any other family member as an occupant of the unit.
- 12) Promptly notify BHP in writing if any family member no longer lives in the unit.
- 13) Give BHP a copy of any owner eviction notice.
- 14) Pay utility bills and supply appliances that the owner is not required to supply under the lease.
- 15) Not allow unauthorized individuals to live in the assisted unit. Any guest staying longer than 14 consecutive days, (unless your lease states less than 14 days is permitted), without the prior approval of BHP is considered an "unauthorized individual".
- 16) Not to engage or allow any household members (or guests) to engage in any alcohol abuse resulting in disturbances to others or in any drug-related or other criminal activity.
- 17) Not engage in or threaten abuse or display violent behavior towards BHP personnel. Any threat will be taken seriously, and the police may be contacted.
- 18) Any information the family supplies must be true and complete!

**All information provided in my housing application and pre-occupancy questionnaire are incorporated on this form by reference. ADDITIONAL INFORMATION:**

Initial leases must be for a minimum of 12 months. Certificate holders will no longer qualify for the Program when 30% of the household income equals the total rent on the unit plus the utility allowance. Voucher holders will no longer qualify when 30% of the household income equals the applicable payment standard.

If you feel you or your family have been discriminated against on the basis of age, race, color, creed, religion, sex, disability or national origin, you may contact your Occupancy Specialist for a HUD discrimination complaint form.

I have read, understood, and received a copy of this form and agree to all of its provisions. I also understand that if I have any questions it is my responsibility to ask my Occupancy Specialist for clarification. I further understand that any assumptions made on my part may cost me my housing assistance.

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

## **ADDENDUM B      DAMAGE CLAIM AND VACANCY LOSS INFORMATION**

**HAP Contracts signed after December 1, 1995 are not eligible for damage claims or vacancy loss.**

### **A.      Voucher Program**

Owners participating in the Voucher Program may not make claims against BHP for vacancy losses beyond the month in which the vacancy occurs. The owner may retain the entire Voucher payment for the month in which the family moves.

### **B.      Certificate Program**

Owners participating in the Certificate Program may claim a vacancy loss payment for a period not to exceed 60 days or the expiration of the lease, whichever comes first. The payment will not exceed eighty percent (80%) of the Contract Rent in force at the time the vacancy occurred multiplied by the number of days the unit remained vacant. If the owner collects any of the family's portion of the rent for this vacancy period which, when added to the 80% payment results in more than the Contract Rent, the excess is immediately payable to BHP.

Owners may not receive payments for periods which the owner is reimbursed from other sources, or where a security or utility deposit may be used to reimburse some or all of the Contract Rent owed. If the vacancy is the result of any of the following then the owner is not eligible to receive any payments for the vacancy period.

1. An action by the owner that violated the lease or eviction requirements of the program, or
2. If the vacancy is due to a mutual termination of the lease by the owner and tenant, or
3. If the tenant or owner provides the other with proper Notice of Intent to Terminate the Lease as provided in the lease,

### **C.      Owner Responsibility**

Owners are required by program rules to take certain actions whenever a family vacates a unit. These actions are prerequisites to the issuance of vacancy payments and include:

1. Notifying BHP immediately upon learning of the vacancy or prospective vacancy, **and**
2. Taking all feasible steps to fill the vacancy, particularly requesting BHP to refer Certificate/Voucher holders or other eligible persons and by advertising

the unit's availability.

**D. Unpaid Rent and Damage Claims:**

When BHP becomes aware that a family has vacated a unit, BHP will notify the family in writing that their entitlement to future benefits under any other low-income housing program will depend upon the disposition of any claims filed by the owner for the following:

1. Unpaid tenant rent.
2. The cost of cleaning the unit following the family's departure.
3. Damage caused by the family or their guests to the unit in excess of normal wear and tear.
4. Vacancy loss payments.

BHP will advise the family that if any such claims are filed, and if BHP authorizes payment, the family will be required to reimburse BHP for any amounts paid before the family's benefits are resumed. Finally, BHP will encourage the family to personally resolve any claims their former landlord may have against them.

An owner participating in the certificate program may claim reimbursement for unpaid rent not covered by the security deposit. This reimbursement however, must not exceed the lesser of the amount actually owed for two month's Contract Rent, minus the greater of:

1. The security deposit actually collected, **or**
2. The amount the owner could have collected under the program rules.

If an owner files a claim for damages, the owner must show an attempt to collect the damages from the tenant. The tenant must have been notified in writing and have been given a reasonable opportunity to respond in writing. This notification must include a copy of the owner's cost of cleaning or repair or copies of actual invoices for these services.

In processing a damage claim, BHP will consider the initial inspection report signed by the owner and tenant, the post vacancy inspection report performed by BHP, the owner's invoices for materials and labor, and any comments regarding the claim offered by the family. If BHP determines that it will pay all or any portion of the claim, BHP will notify the family in writing and allow the family a reasonable time to

repay the amount or be subject to termination from the program. The notice will state that the family has the right to an informal hearing on BHP's proposed action and that it may exercise this right by filing a written request for a hearing by a date specified in the notice. The notice will further advise the family that if BHP receives a request for a hearing, the family's termination from the program will be postponed pending the outcome of the appeal.



## Public Notice for Agency Plan

The Housing Authority of the City of Boulder (HACB) has created an "Agency Plan" as required by the Quality Housing and Work Responsibility Act (QHWRA) passed by Congress in October 1998. The Agency Plan is available for review at the main Housing Authority Office—3120 Broadway, Boulder, CO effective September 4, 2002. It is also available on the internet at [www.boulderhousing.org](http://www.boulderhousing.org). There will be a Public Hearing to review the Agency Plan on October 10, 2002 at 1:00 pm. The Public Hearing will be held at the Walnut Place Apartments; 1940 Walnut Street, Boulder, CO 80304. The HACB will review and incorporate public comment where appropriate. The Agency Plan will be reviewed by the HACB's Board of Commissioners on November 4, 2002 and submitted to HUD on November 5, 2002. If you have any questions, please contact Laura Norris at (303) 441-3150.

October 10, 2002

**Notice Regarding the Agency Plan**

**Dear Residents:**

**Please be advised that copies of Boulder Housing Partner's Agency Plan is available for your review in the Manager's Office. You may check out a copy of the plan or purchase a plan for \$.10/page. Copying charges are \$8.00.**

**The comment period for the Agency Plan has been extended until October 24, 2002 at 5:00 pm. Please address written comments to:**

**Laura Norris  
Director of Housing Services  
3120 Broadway  
Boulder, CO 80304**