HOME-ARP ALLOCATION PLAN DRAFT: FROM HOMELESSNESS TO HOUSING

COLORADO SPRINGS

2022

Prepared by the Community Development Division

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INTRODUCTION

On March 11, 2021, President Biden signed the American Rescue Plan Act (ARPA) into law, enabling over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses.

To address the critical need for homelessness assistance and supportive services across the country, Congress appropriated \$5 billion in ARPA funds to be administered by the U.S. Department of Housing and Urban Development (HUD) through the <u>HOME Investment Partnerships program</u> to carry out activities that *must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in* other vulnerable populations. These activities include:

- (1) development and support of affordable housing,
- (2) tenant-based rental assistance (TBRA),
- (3) provision of supportive services, and
- (4) acquisition and development of non-congregate shelter units.

As a HOME program participating jurisdiction (PJ), the City of Colorado Springs received \$5,741,978 to benefit our community's qualifying populations. The amount is in addition to the annual allocation of HOME funds that the City receives from HUD. This draft plan describes the City's intended use of the additional HOME funds as required in <u>HUD Notice CPD-21-10</u>.

CONSULTATION

The City of Colorado Springs recognizes the unique opportunity that the additional HOME program funding brings to the affordable housing landscape and the ability of local homeless service providers to reduce homelessness for many individuals and households. The City is working closely with the Colorado Springs Housing Authority (CSHA) and the Pikes Peak Continuum of Care (CoC) to coordinate efforts that serve our qualifying populations.

Consultation Process Summary

Community Development staff held a general consultation meeting on December 16, 2021, inviting nearly 60 individuals from 42 organizations. This initial meeting was to introduce the program basics to the stakeholder group, share basic data about our community's qualifying populations, and solicit feedback about the size and needs of the qualifying populations served by the meeting attendees.

The consultation process was a four-month, iterative process and was built upon gathering more current data and changing conditions. The process can be summarized to date as follows:

- (1) Virtual consultation via Microsoft Teams (12/16/21) with over 45 attendees
- (2) Follow-up one-on-one discussions with stakeholders who requested one (December-February 2021)
- (3) Consultation with the Pikes Peak Continuum of Care's ad hoc HOME Funds Committee (January 27, 2022)
- (4) Consultation with the Pikes Peak Continuum of Care's Governing Board (March 25, 2022)

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- (5) Share materials and Committee comments with all consultation stakeholders and invite feedback
- (6) Incorporate feedback into version for public review and comment

Table 1: Organizations Consulted

Agency/Organization	Org type	Method of consultation
Academy School District 20	Education	Virtual meeting
Apartment Association of Southern Colorado	Housing services	Virtual meeting
The Arc	Disability advocate	Virtual meeting
Brothers Redevelopment	Housing services	Invitation to virtual meeting
	Fair Housing	
	Civil rights	
Catholic Charities	Family services	Virtual meeting
Cheyenne Mountain School District 12	Education	Virtual meeting
CPCD/Head Start	Education	Virtual meeting
Colorado – Office of Homeless Initiatives	Local government	Invitation to virtual meeting
Colorado Springs Community Development Division	Local government	Virtual meeting
Colorado Springs Housing Authority	Public housing	Virtual meeting
Colorado Springs Fire Department	Local government	Virtual meeting
Colorado Springs Police Department	Local government	Invitation to virtual meeting
Colorado Springs School District 11	Education	Virtual meeting
Colorado Legal Services	Legal services	Virtual meeting
	Fair housing	
	Civil rights	
Community Health Partnership	Continuum of Care	Virtual meeting
District 49	Education	Virtual meeting
El Paso County Economic Development	Local government	Virtual meeting
Family Promise	Homeless services	Virtual meeting
Food to Power	Family services	Invitation to virtual meeting
Greccio Housing	Housing provider	Invitation to virtual meeting
Harrison School District 2	Education	Virtual meeting

Homeward Pikes Peak	Homeless services	Virtual meeting
Haseya	Domestic violence service provider	Invitation to virtual meeting
The Independence Center	Disability advocate	Invitation to virtual meeting
Joint Initiatives	Youth services	Virtual meeting
Kingdom Builders	Domestic violence service provider	Invitation to virtual meeting
Lewis-Palmer District 38	Education	Virtual meeting
Lutheran Family Services	Family services	Virtual meeting
Mary's Home	Domestic violence service provider	Virtual meeting
Mt. Carmel Veterans Service Center	Homeless services - veterans	Virtual meeting
National Alliance on Mental Health Colorado Springs	Health advocate	Invitation to virtual meeting
Partners in Housing	Family services	Invitation to virtual meeting
Pikes Peak Area Agency on Aging	Public housing	Virtual meeting
Pikes Peak Library District	Family services	Virtual meeting
The Place	Homeless services - youth	Virtual meeting
Rocky Mountain Human Services	Homeless services - veterans	Virtual meeting
Salvation Army	Homeless services	Virtual meeting
Servicios de la Raza	Family services	Invitation to virtual meeting
Silver Key	Senior services	Virtual meeting
Springs Rescue Mission	Homeless services	Virtual meeting
TESSA	Domestic violence service provider	Invitation to virtual meeting
Westside Cares	Family services	Virtual meeting

The Division posted notice of the 15-day review and comment period in the paper of record, The Gazette, as well as through various media channels, email newsletters, and partner platforms. A digital draft of the plan was available for review and comment on the City of Colorado Springs (City) website. Physical copies were also available at various public locations throughout the City.

The public notice was published in the Gazette on March 29, 2022. The public comment period goes from April 13-28, during which time two virtual public hearings will be held.

- Virtual HOME-ARP Public Hearing #1: Tuesday, April 19, 10-11am via Zoom
- Virtual HOME-ARP Public Hearing #2: Wednesday, April 20, 6-7pm via Zoom

The allocation plan draft also went through City Council review. It was introduced on April 11, 2022, during which time members of the public could see the plan presented. It was approved on consent on April 26, 2022.

Efforts to broaden participation

- 1. The City invited stakeholders outside of the Pikes Peak Continuum of Care to comment on homeless needs on multiple occasions.
- 2. The City uses social media outlets to solicit general feedback.
- 3. In addition to the one required public hearing on the allocation plan, the public had three different opportunities: 1) in front of City Council on 4/11/22 during citizen comment (the agenda and plan materials will have been published on Council calendar, 2) a daytime virtual hearing to best reach service providers, and 3) an evening hearing to best hear all neighbors and residents.
- 4. Plan draft will be sent to multiple local housing advocates serving diverse populations and neighborhoods.

Summary of all comments

All comments have been accepted to date; none have been rejected. A summary of all comments separated by meeting or opportunity is below:

December 2021 general consultation comments

- Mental Health (MH)
 - MH and substance abuse are significant obstacles for many people, especially unsheltered individuals
 - Trauma-informed mobile services and outreach critical in getting people off the street
 - \circ No MH services for youth; many parents sending kids in MH crisis out of state
- Perception
 - Shelter rules and expectations often misunderstood
 - Certain barriers to MH and addiction resources exist for many reasons
- Staff supports and operational capacity

- Geographic distribution of resources
 - Homeless resources are needed all over the city and not just downtown
 - Transportation logistics huge expense for school districts and families
- Housing affordability
 - Affordable housing is the main need
 - Permanent supportive housing needed in all parts of the city
 - Rising rents are complicating voucher utilization
- Data
 - o Official counts are usually an undercount
 - 2022 PIT count will be different this year car camping and geotags now part of strategy
 - Everyone expecting a big increase in homeless counts and need mid- and post-pandemic

January 2022 – CoC comment summary

Members of the CoC HOME Funds Committee reviewed an initial draft of the plan. All comments were accepted and incorporated into the next draft. Summary of committee comments:

- Address homeless subpopulations via HMIS data
- Add disability population housing issues
- Add Coordinated Entry score data for permanent supportive housing
- Address rental assistance programs in housing needs analysis
- Data merits no preference for qualifying populations

March 2022 – CoC comment summary

City staff will present draft at the March meeting of the CoC Governing Board.

Governing Board's questions:

- Eligible costs for nonprofit capacity building funding? Response: CDD will share HUD materials on each eligible activity to service provider community.
- Does housing count of multifamily buildings include LIHTC units? Response: Yes.
- Can the plan be amended down the road? Response: Yes
- What housing trends do you see down the road? Response: Rental assistance programs kept people housed during the pandemic and address acute needs, but permanent units still provide best outcomes. HUD's allowance of non-congregate shelter is an attempt to address public health needs while providing a flexible building type that can easily convert to permanent housing when necessary.
- Are building locations already determined? Response: No.

Comments:

• Concerns over adequate supportive service funding

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 Response: CDD can address needs among service providers and housing developers every year in the regular annual action planning process and adjust funding priorities accordingly.

No edits or suggestions for additional data

April 2022 – Public comment summary

Virtual public hearing #1:

- Are developers of these projects going to have to deal with neighbors who don't want them? Affordable housing and NCGs are needed all over the city, not just downtown. Response: Projects funded with HOME-ARP funds will have to go through the City's permitting and entitlement processes like any other developments would, though we will work with them and help them navigate the process as efficiently as possible. They will be responsible for finding a suitable location, either in an area that is already zoned for it or be prepared to go through the public process of a land use change request. There are several successful precedents to look at as an example, so we are optimistic that future HOME-ARP projects will be welcomed by neighbors.
- Homeless families need something different they don't like going to traditional shelters. Response: That is the idea behind NCG shelters. They meet families' needs well and help prevent the spread of infectious disease. NCG shelters funded by HOME-ARP funds also have the added flexibility of being able to convert to permanent affordable rental housing should the need for shelter wane.
- Concern for DV victims. Response: This is a group for whom updated geographic and demographic data is very hard to obtain because of VAWA data privacy requirements. If there are more specific data sources about the current scale and scope of need in Colorado Springs beyond the number of beds available, please share them.
- Is there any way to ensure that these new units are accessible? Lack of accessible housing is a crisis. So many people with disabilities who can live independently are stuck in institutions or assisted living. Response: We incorporated direct quotes about this very issue from the former Independence Center director in the plan. The cost of keeping people with disabilities in medical facilities or assisted living comes at a much higher cost to taxpayers and insurance subscribers than simply funding accessible rental housing. Accessibility and universal design will be design priorities for all new HOME-ARP projects.

Virtual public hearing #2: No attendees

NEEDS ASSESSMENT AND GAP ANALYSIS

The City is consulting multiple sources of information about housing and shelter needs. With 2020 Census data and 2022 Point-in-Time data unavailable until Spring 2022, the City used 2021 Point-in-Time (PIT), Housing Inventory Count (HIC), 2021 HMIS data, as well as 2021 Coordinated Entry scores, 2019 American Community Survey, and November 2021 CoStar data for the plan draft to get a sense of the community need using both pre-pandemic and current numbers.

Homeless Needs Inventory

The following section uses Homeless Management Information Systems (HMIS) data from our region's continuum of care administrator, Community Health Partnership, to assess how many people experiencing homelessness have accessed services and to what extent in 2021.

According to the 2021 Point-in-Time count, there were 1,156 people experiencing homelessness on the night of January 24, 2021. This is a 13% reduction from the 2020 count of 1,339.

Table 2 shows more data from the 2021 PIT and Housing Inventory Count (HIC) and the extent to which each shelter or housing resource in the Colorado Springs area was used. Emergency shelter and other temporary resources have the lowest utilization rates while the more permanent resources have the highest utilization rates.

Housing Type	HIC	PIT	Utilization
Emergency Shelter	861	626	73%
Transitional Housing	642	538	84%
Permanent Supportive Housing	722	696	96%
Other Permanent Housing	40	37	93%
Rapid Re-Housing	179	179	100%
Total Temporary Housing (ES+TH)	1503	1164	77%
Total PH (PSH+RRH+OPH)	941	912	97%
Total ALL	2444	2076	85%

Table 2: 2021 Utilization Rates by Housing Type

Table 2 Data Source: Pikes Peak Continuum of Care/Community Health Partnership

Not everyone who accesses homeless services takes what is known as the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT), a triage tool that takes the client's whole health profile into account to determine which supports and housing type would be the best solution to keep them safely housed. Once a person/household does go through this, they are entered into Coordinated Entry, a

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process by which area providers match clients with the first available and appropriate housing that comes available.

Figure 1 below shows primarily two things: 1) the total number of people (1,967) who were on the Coordinated Entry list in 2021 and 2) the composition of that group by family status, age, military service, and disability. There are many ways these groups can intersect (e.g., a household with a senior, disabled veteran and two young children), but these are just four subpopulations.

Figure 1: Who Sought Housing Through Coordinated Entry

1,967 **Unduplicated Households** Service **Family Status** Age Disability Disabling conditions Individuals Families Youth Adult Senior Veterans Not veterans No disabilities 13% 15% 16% 18% 31% **69**% 87% 82% 69%

Figure 1 data source: HMIS (Community Health Partnership)

We see that there are over six times more single-person households in Coordinated Entry than family households. While there may be simply more individual households experiencing homelessness than family households, this difference is substantial. Comments from McKinney-Vento liaisons during the consultation process indicate that there are likely myriad reasons for this– families may be more reluctant to seek homeless services; they may be more likely to "double up"; or they may not have easy access to shelter where they live, since most homeless services are concentrated downtown.

By age, adults (ages 25-59) make up 69% of individuals on the Coordinated Entry list, with youth (ages 15-24) and seniors (60 and over) making up nearly equal parts of the remaining 31%.

By military service, we see that veterans make up 18% of Coordinated Entry clients.

Lastly, we see that the majority (69%) of all clients seeking housing through Coordinated Entry have at least one disabling condition.

While Figure 1 tells us who is looking for housing, the next inquiry is to determine what type of housing they need. Figure 2 (below) illustrates the percentage of households in Coordinated Entry whose presenting needs gave them the highest VI-SPDAT scores, qualifying them for permanent supportive housing.

Figure 2: Coordinated Entry Participants Qualifying for Permanent Supportive Housing by Subpopulation

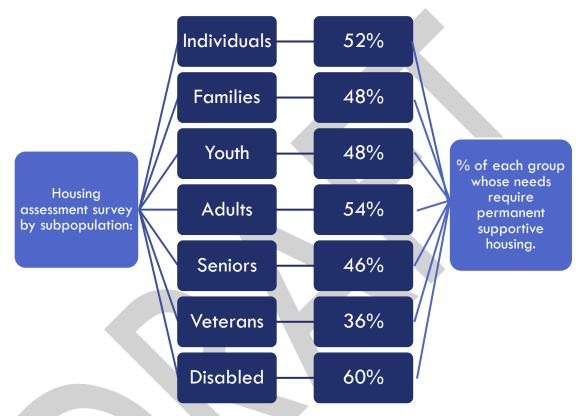


Figure 2 data source: HMIS (Community Health Partnership)

The subpopulations in Figure 2 are not mutually exclusive; as in Figure 1, they are categorized by household status, age, service, and disability.

People with disabilities have the highest share of those needing permanent supportive housing, with 60% scoring in the PSH range. Veterans have the lowest share, with over a third (36%) of all veterans who take the VI-SPDAT scoring for PSH.

Among all populations, nearly 50% of all people taking the housing assessment survey have chronic conditions requiring permanent supportive housing.

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Housing Needs Inventory and Gap Analysis

The City calculated the level of need using the most recent Comprehensive Affordable Housing Strategy (CHAS) data, which has had three additional releases have occurred since the City completed its Housing Needs Assessment for its 2020-2024 Consolidated Plan. This data demonstrates the extent of housing problems and housing needs, particularly for low-income households.

Table 3: Gap Analysis for Residents At Risk of Homelessness and Housing Instability

	Current	Level of Need	Gap Analysis
	Inventory		
	# of Units	# of	# of Units
		Households	Needed
Total MF rental units (5 units+)	56,368		
Includes LIHTC projects and other subsidized units			
Estimated # of all 1-4 unit rentals	16,413		
Total # rental units	72,781		
Colorado Springs Housing Authority owned and	1,519		
managed units and conventional public housing			
Rental units affordable to households at 30% AMI	2,037		
and below			
Rental units affordable to households between 31% and 50% AMI	10,066		
Estimate of non-subsidized affordable 1- to 4-unit rentals (assumption of 20%)	3,283		
Total # affordable rental units	16,905		
	,		
0%-30% AMI renter households with 1 or more		18,020	
severe housing problems			
30%-50% AMI renter households with 1 or more		15,740	
severe housing problems			
Total # of very low-income households		33,760	
(50% AMI and below)			
Current Gap			16,855

Table 3 Data Source: CHAS (2014-2018), ACS (2019), CSHA Q4 2021 report. *Refers to all multifamily rental units in buildings with 5 or more units. Single family rentals and 2-4plex units are estimated in the number of NOAH rentals.

The Current Gap at the bottom right corner of Table 3 shows the City's estimate of the demand for housing units affordable to renter households making 50% or below the Area Median Income (AMI).

Current Inventory

We calculated current inventory using CoStar, a commercial real estate database, and 2019 American Community Survey (ACS) data. A CoStar search performed in November 2021 shows a total of 56,368 multifamily rental units overall. The figure only counts apartment buildings of 5 units or more; projects financed by Low-Income Housing Tax Credits and other subsidies are included. 2019 ACS data reports the number of all rental units as 72,781. The difference (16,413) can be assumed to be smaller rental units of all types – single-family houses, duplexes, townhomes, etc.

To determine the number of affordable units within the overall rental housing stock, we first factored in public housing units owned and managed by the Colorado Springs Housing Authority. Housing Choice Vouchers and other forms of rental assistance were **not** factored into this calculation. The housing authority owns and operates 1,519 units of public housing and other multifamily projects.

To calculate the number of other affordable multifamily units on the market, we used CoStar to search and filter all apartment data by rental price. To look for units affordable to households in the designated income ranges, the City refers to HUD's <u>Income Summary Limits</u> and calculated affordable rent by using 30% of monthly income as a filter in CoStar.

	-	•	_		_		_	•
30% AMI	1	2	3	4	5	6	7	8
Household								
Size								
Monthly	\$1,442	\$1,650	\$1,854	\$2,208	\$2,587	\$2,965	\$3,343	\$3,722
Income								
30% of	\$433	\$495	\$556	\$663	\$776	\$890	\$1,003	\$1,117
income								
for rent								

 Table 4: Affordable Rent Calculation (Households Making 30% or less of Area Median Income)

When the CoStar search results are cross referenced with the rent amount that is affordable to 30% & 50% AMI households per month, we find that a range of affordable units exists within the local inventory. Table 3 indicates that a total of 12,103 units are affordable to households earning less than 50% of the area median income. However, it is important to note that units at these rents typically have vacancy rates of 1-2% which is well below the Colorado Springs' market average of 6-7%.

The last figure in Table 3 that is included in the total inventory of affordable rental inventory is an estimate of the number of non-subsidized, naturally occurring affordable housing (NOAH) that is made up of single-family homes or buildings with 4 units or less. The assumption is that 20% of the rental stock of these housing types are NOAHs. This assumption is based on the share of affordable units found in the multifamily inventory from CoStar.

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Total Number of Very Low- & Extremely Low-Income Households

As we do in our Consolidated Plan process, the City used the most recent Comprehensive Housing Affordability Strategy (CHAS) dataset available (2014-2018). Each year, the U.S. Department of Housing and Urban Development (HUD) receives data from the U.S. Census Bureau to produce the data. This data demonstrates the extent of housing problems and housing needs, particularly for low-income households. The main housing problems assessed are: (a) cost-burdened households; (b) substandard housing; and (c) overcrowding.

With a total of 33,760 very low-income renters spending over 30% (cost burdened) or 50% (severely cost burdened) of their monthly income on rent, this figure represents the major problem experienced by renter households at-risk of homelessness as well as other low-income populations.

Current Gap Between Demand & Supply

This figure is the difference between the number of cost burdened and severely cost burdened lowincome renters (33,760) and the number of estimated affordable housing units (16,905) in Colorado Springs. While the gap is lower than the last published estimate of over 26,000 units, there is still a significant lack of affordable and available rental housing across the Colorado Springs area.

Discussion

The availability of vouchers and rental assistance from various federal sources adds an additional layer of complexity in determining the gap in affordable rental units.

Table 5 lists federally funded rental assistance programs currently operating in Colorado Springs that prioritize the same qualifying populations that HOME-ARP funds are designed to help. Table 5 does **not** include privately funded (e.g. faith-based programs, mutual aid) initiatives serving smaller geographic or membership-based subcommunities.

Four of these programs are short-term, funded by either the CARES Act, the 2021 Appropriations Bill, or the American Rescue Plan Act. The short-term duration of rental assistance programs makes the need for more permanent housing options increasingly urgent.

All programs listed below are income-based. All beneficiary households counted in Table 5 must make no more than 80% AMI, though most programs prioritize very low- and extremely low-income households.

		• /	
Voucher or Rental Assistance Program	Source	Administrator	Vouchers Available/ Households Currently Assisted
Housing Choice Voucher	HUD	CSHA	2,290
Emergency Housing Voucher*	HUD	CSHA	101
Emergency Housing Voucher*	HUD	CO Department of Local Affairs	33**
VA Supportive Housing Voucher	VA/HUD	Independence Center	251
Homelessness Prevention and Rapid Rehousing*	HUD	City of Colorado Springs	128
Rapid Rehousing	HUD	City of Colorado Springs	14
Tenant Based Rental Assistance	HUD	City of Colorado Springs	40
Emergency Rental	Treasury	City of Colorado	2,574***
Assistance Program		Springs/CO Dept of	·
(Round 1)*		Local Affairs	
Total number of househo	Total number of households currently assisted by vouchers or		
rental assistance program			

Table 5: Vouchers and Rental Assistance Programs for Extremely Low-Income Renters

Table 5 Notes: *Short-term funding. **Awarded to El Paso County area housing providers out of 438 vouchers available statewide. ***Total reflects number of beneficiaries assisted with Colorado Springs ERAP funding in 2021; city residents helped with the State of Colorado's ERAP funds are not included in this calculation.

Table 5 shows that there are currently voucher and rental assistance programs available to serve at least 5,431 Colorado Springs residents. This is not calculated in the housing gap analysis box – which only counts physical housing units – because there may be overlap between a voucher recipient and affordable housing resident. While proven to be effective in preventing homelessness and providing some temporary support for households in crisis, rental assistance programs do not reduce the gap in affordable housing supply.

The administration of these vouchers and rental assistance funds is a community endeavor. While the Colorado Springs Housing Authority manages the most widely recognized voucher program, the Housing Choice Voucher program (commonly referred to as Section 8), the State of Colorado assisted Colorado Springs residents with ERAP applications and many nonprofits take on managing veteran vouchers, rapid rehousing and homelessness prevention funds, and other rental assistance programs.

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SIZE AND DEMOGRAPHIC COMPOSITION OF QUALIFYING POPULATIONS OF COLORADO SPRINGS

The HOME-ARP program requires that funds primarily benefit individuals and families in the following specified qualifying populations.

- Homeless
- At risk of homelessness
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Other populations, such as those requiring services or assistance to prevent homelessness or those at greatest risk of housing instability
- Veterans who meet any of the above criteria

Any individual or family who meets the criteria for these populations is eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria (e.g., additional income criteria).

The following sections are numbers and narratives describing these populations by size, demographics, and other characteristics.



People Experiencing Homelessness

The total PIT count of people experiencing homelessness has gone down since 2019. In 2021, there was no unsheltered count, which is why the sheltered and unsheltered number is the same on the chart.

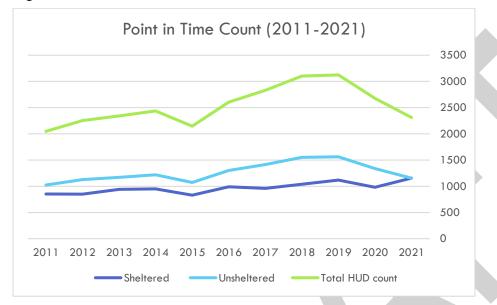


Figure 3: Point in Time Count Trends

Figure 3 Data Source: Pikes Peak Continuum of Care

While the total number of those experiencing homelessness has gone up, we did see our sheltered population count climb upward last year. This growth is due to several factors. With a municipal camping ban in place, it is possible that many people police encountered camping chose to stay at a shelter rather be fined. It is also possible that our newest street outreach team based in the Colorado Springs Fire Department referred more people to shelter and case management, driving up the shelter utilization. The City also offered emergency isolation shelter for those experiencing symptoms of COVID-19 and other infection diseases.

As previously shown in Figure 1 (p. 10), the majority of our community's shelter beds are for unaccompanied adults. Figure 4 on the following page shows a demographic breakdown of sheltered unaccompanied adults (no unsheltered count for 2021 is available).

Figure 4: Racial Composition of Homeless Unaccompanied Adults in Comparison to General Population

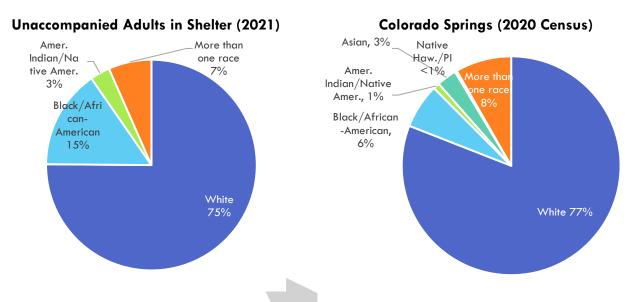


Figure 4 Data Source: Pikes Peak Continuum of Care (2021) and Census (2020)

The two pie charts above (Fig. 4) show the racial disparities that exist among people experiencing homelessness in Colorado Springs. The population of black people in homeless shelters is over twice the share of the black population in the city. The share of Native American people in shelters is over three times their share of the city's general population.

The pie charts on the following page (Fig. 5) shows an even deeper disparity for Black and multiracial families. As discussed in the Homeless Needs Inventory (Fig. 1, pg. 11), families make up 13% of all people recorded in HMIS in 2021.

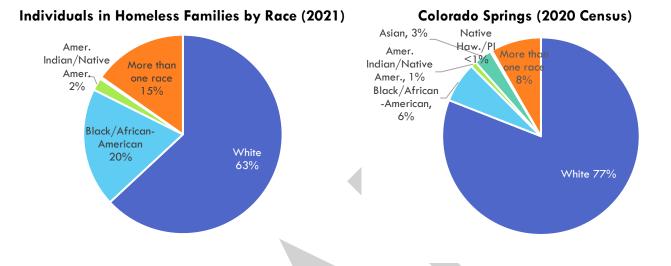


Figure 5: Homeless Families by Race (2021) - All individuals in household

Figure 5 Data Source: Pikes Peak Continuum of Care

Black families make up 20% of all families experiencing homelessness, compared to 6% of the general population. While 8% of city's general population identifies as multiracial, 15% of individuals in homeless families are multiracial. The share of Native families in shelters is twice their share of the city's general population.

The HOME-ARP stakeholder meetings discussed issues of equity and disparities. The Pikes Peak Continuum of Care administrator, Community Health Partnership, engaged in technical assistance from the National Alliance to End Homelessness in 2021. This exercise pulled similar race and ethnicity data from 2020, initiating dialogue among some providers. Some providers monitor LGBTQIA+ and disability status as well and advocate for best practices for these communities, while discussions and resources for cultural competencies for serving groups along racial, ethnic, language, or citizenship lines are not quite as commonplace yet.

Children and Youth Experiencing Homelessness

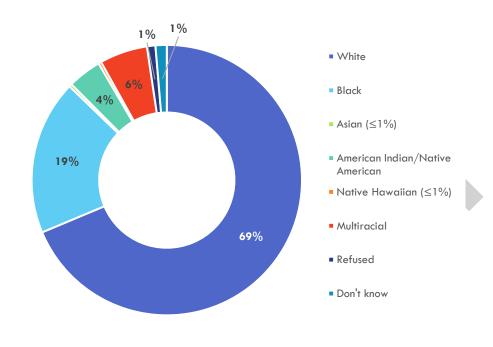


Figure 6: Homeless Youth Demographics (297 Total)

Figure 6 Data Source: Built for Zero Dashboard, Youth Demographics from Jan 8, 2021 to Jan 31, 2022

In 2021, our service providers assisted 297 youth ages 15 to 24 in Colorado Springs. These were counted by clients who used drop-in services, emergency shelter, or through street outreach. Black and Native American youth make up a disproportionately larger share of the homeless youth population in comparison to their share of the general population (6% and 1%, respectively).

The count performed by public schools as outlined by the McKinney-Vento Act is done differently. Table 6 shows a point-in-time snapshot from the 2021-2022 school year of students identified as homeless.

Table 6: 2021-2022	Pupil Membership	b Count by Instructional	Program - Homelessness
--------------------	------------------	--------------------------	------------------------

School Districts in Colorado Springs	Homeless Student Population
Harrison District 2	54
Colorado Springs District 11	162
Cheyenne Mountain District 12	11
Academy District 20	90
Lewis-Palmer District 38	16
District 49	133
Total	466

Table 6 Data Source: Colorado Department of Education

Table 6 shows a **single day's** snapshot of one segment of the student body population. These figures from the Colorado Department of Education show that in a single day this school year, Colorado Springs' six school districts counted 466 homeless students. In a 2021 brief from Community Health Partnership, the total number of unique homeless students counted in the El Paso County area for the 2020-2021 school year was 1,981 (the 2021-2022 single day count for all schools in the county, not just within Colorado Springs, was 766).

Feedback from our local McKinney-Vento liaisons indicates that an exact count is difficult to accomplish and that single day snapshots and even school year counts are usually undercounts.

Another way to look at students who are at risk of homelessness is to look at concentrations of family poverty. The map on the following page shows Census tracts where **both** conditions exist: 1) at least 20% of households are made up of families with children and 2) at least 20% of households are families in poverty. The map in Figure 7 shows concentrations of family poverty throughout the Southeast neighborhoods, along S. Nevada in the downtown and south of downtown areas, and throughout the areas between North Nevada and the I-25 corridor.

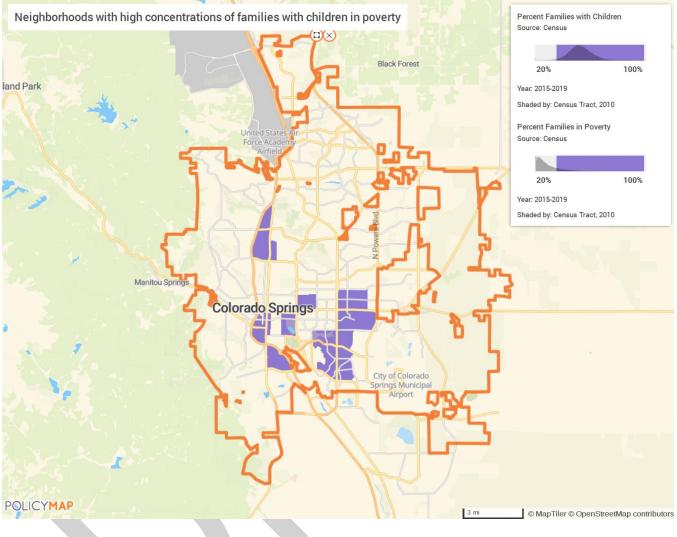


Figure 7: High Concentrations of families with children in poverty

Figure 7 Data Source: ACS 2019

Affordable Housing Residents

Public housing

The Colorado Springs Housing Authority (CSHA) manages a portfolio of several thousand units through various programs, the majority of which are through the Housing Choice Voucher program (Section 8). These work as rental assistance for units owned and operated in the private market.

Table 7: CSHA Units by Program

Housing Program	Units
Section 8 vouchers	2,290
Conventional public housing	706
Low Income Housing Tax Credit partnerships	1,863
CSHA owned/managed	813
Total # of CSHA units	5,757 (minus 850)

Table 8: CSHA Beneficiaries by Needs and Program

	Share of voucher holders	Share of public housing residents
Extremely low income (0-30% AMI)	79%	79%
Disabled	48%	52%
Senior household	28%	28%

Table 8 shows the share of CSHA residents who qualify under HUD guidelines as special needs populations. The high share of residents with heightened vulnerability shows the capacity at which CSHA programs are operating and the degree of competition among all qualified applicants. The need for such income-restricted units far outweighs the supply of our local housing authority's portfolio. In addition to the Colorado Springs Housing Authority, Colorado Springs has a large community of nonprofits that own and manage (or are about to develop) their own permanent housing projects. All serve households making 80% AMI or below.

Housing Provider	Populations Served	Number of Units
Family Life Services	Families	9
Greccio	Families, seniors	513
Homeward Pikes Peak	Single adults with chronic conditions, families, veterans	50*
Ithaka	Single adults with chronic conditions, families, seniors	44
Mary's Home	Domestic violence victims	15
Myron Stratton	Seniors	114
Partners in Housing	Families	68
Salvation Army	Families, seniors, veterans	11
Silver Key	Seniors	TBD
Springs Rescue Mission	Single adults with chronic conditions	65
Solid Rock CDC	Families	77*
Volunteers of America	Families, seniors	307
Total number of tr	1,273	

Table 9: Affordable Housing Owned and Managed by Local Providers

*Currently under construction

Most, but not all, of the providers above participate in Coordinated Entry. While all of the 1,273 units above must go to low-income households, not all units are available to households on the Coordinated Entry list. This speaks to the extent people experiencing homelessness must compete for affordable housing with other low-income households.

People at Risk of Housing Instability

Housing instability touches renters and homeowners alike, though renters are significantly more at risk since they do not have home equity, are subject to rent increases, and are more likely to have lower incomes. Housing instability for renters can be one predictor of homelessness. The density map below shows the neighborhoods with the highest share of renters who are severely cost burdened, or pay more than half of their incomes on rent.

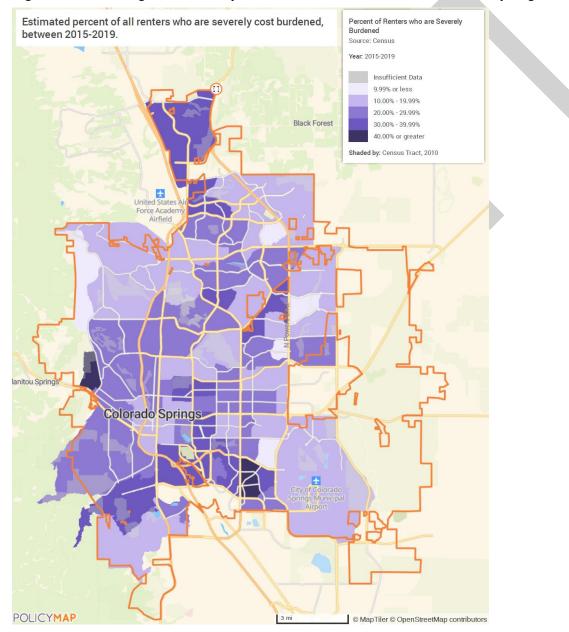




Figure 8 Data Source: ACS (2015-2019)

From Homelessness to Housing

The map on Figure 8 shows that there is not a single Census tract in the city untouched by severe cost burden for renters. There are two neighborhoods – one on the westside and one in the southeast – in which more than 40% of the renter population is paying more than half of their income on rent. In terms of total population numbers, in Colorado Springs, nearly a quarter (24%) of all renters—over 17,000 people—are severely cost burdened.

Veterans

The 2021 Point in Time count tallied 76 sheltered veterans. No unsheltered count was conducted during the first PIT of the pandemic. However, 2020 did establish a downward trend for this population.

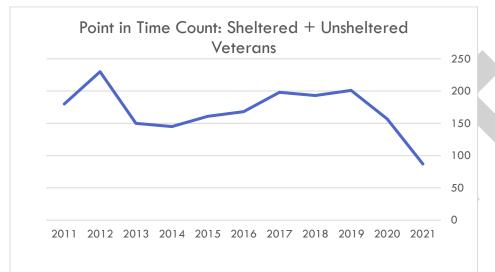
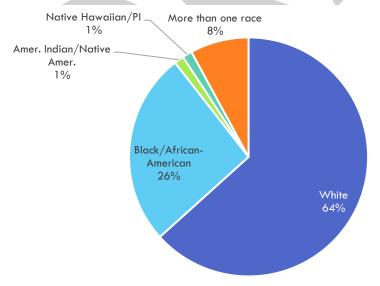


Figure 9: Veteran Homelessness Trend (2011-2021)

Figure 9 Data Source: Pikes Peak Continuum of Care

The City of Colorado Springs and the service provider community have made substantial strides in reducing veteran homelessness. With additional federal resources available specifically for veterans and public-private partnerships, like the <u>Pikes Peak Veteran Housing Fund</u>, the community is optimistic about achieving functional zero for veteran homelessness.





Achieving functional zero depends on addressing the stark disparity in homelessness among Black veterans.

HOME-ARP ALLOCATION PLAN DRAFT: From Homelessness to Housing Disability

The HMIS data in the Homeless Needs Inventory section of this plan show that having a disability greatly increases the chance that a person experiencing homelessness will need permanent supportive housing.

Across the city, 13% of the general population (or 59,348 people) report having some sort of disability (hearing, vision, cognitive, ambulatory, or any condition preventing one from self-care or independent living). This number is the same across gender, but it varies significantly across race and age. Age-related disability is common, but Figure 11 shows the disparities across racial and ethnic lines. Black and Native American populations are much more likely to have a disability in Colorado Springs by a large margin.

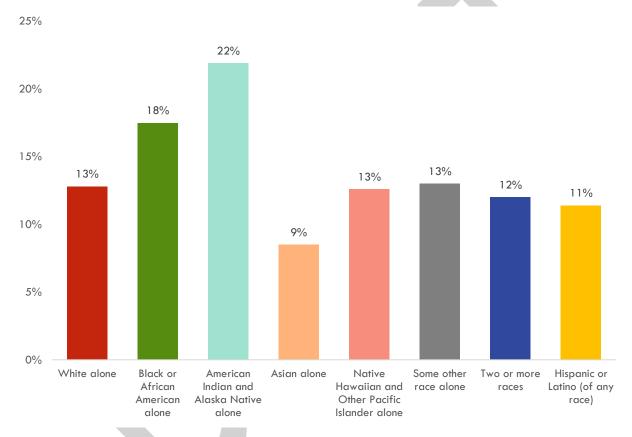




Figure 11 data source: 2020 American Community Survey

Living with a disability often limits earning power. Incomes are general lower among people living with disabilities, limiting their housing choices due to budget. People with disabilities make up a disproportionately larger share of the population living below the poverty line.

Colorado Springs general population in poverty People liv



People living in poverty with a disability

20%

Data source: 2019 American Community Survey

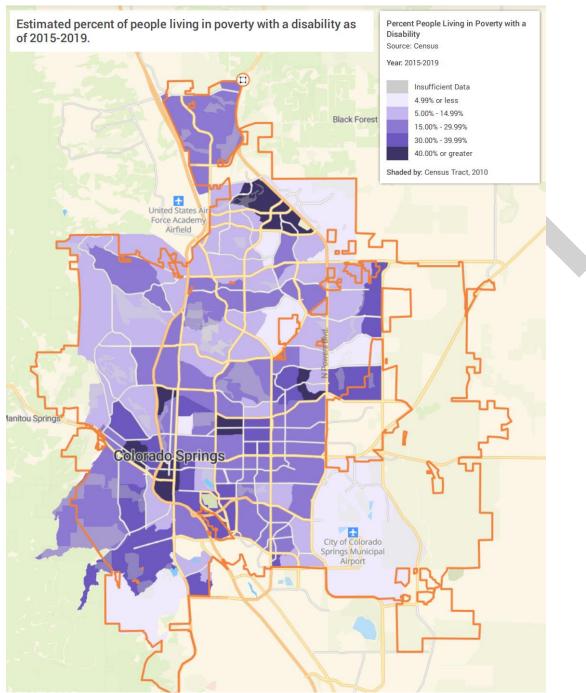


Figure 12: Percentage of people living in poverty with a disability

The map above shows that there are few neighborhoods in the city where residents in poverty with a disability do not live. The greatest concentrations are scattered about the central and northeast areas of Colorado Springs.

From Homelessness to Housing

Linkage between assisted living and accessible housing

Colorado Springs disability advocacy and service provider The Independence Center reports troubling trends for residents trying to transition from nursing homes or assisted living to independent housing. They report:

Between October 1, 2020, and March 30, 2021, 86 people requested to move out of their nursing home back into the community. However, only 16 were completed in that time. Transitioning out of a nursing home can take between 30 days and more than 6 months depending on housing availability, discharge paperwork and getting community supports in place. The largest barrier is finding the accessible, affordable housing. There are people stuck in Colorado Springs nursing homes waiting to get out. They are waiting in the most expensive housing in the community where they do not want to be. Medicaid nursing home beds are at least \$7,000 per month per bed.

-Former Independence Center Executive Director Patricia Yeager

The lack of housing options for low-income, disabled residents who want to live independently leaves them with the most expensive and least desired option while tying up the waiting list for those who cannot live independently. Those without the financial or social supports are most at risk of becoming homeless.

Victims of Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Local, up to date, comprehensive data on victims of domestic violence is difficult to obtain, as service providers do not use HMIS and may use different databases that must follow required privacy laws. For the purposes of this section, CDD staff is using statewide service trends, local police call data, and local housing inventory to get a sense of the scale and scope of needs among this qualifying population.

Service trends

The following data is from the Colorado Summary section of the 16th Annual Domestic Violence Counts Report from the National Network to End Domestic Violence (2022).

On a **single day** in 2021, 32 out of 45 domestic violence programs in Colorado reported the following services provided:

- 950 victims served
 - 51% through shelter or housing
 - 49% through counseling, legal services, or other supportive services
- 371 hotline calls
- 245 unmet requests for service
 - 56% were requests for housing and shelter

Local police reports show that domestic calls went up 50% in the first year of the pandemic, averaging about 1,200 calls per month in 2020.¹ Colorado Springs' largest domestic service provider, TESSA, went from serving 15,000 people in a typical year to serving over 22,000 people in 2020.

Housing and shelter inventory

DV Service Provider	Housing Type	Number of beds
TESSA	Emergency shelter	32
Mary's Home	Transitional housing	15

The 2021 Point in Time count tallied 24 adult survivors of domestic violence in shelters that are not dedicated domestic violence shelters.

Need

If roughly half of all Colorado domestic violence hotline calls were requests for housing or shelter, then one can estimate that over 11,000 people who called TESSA in 2020 needed some sort of housing or shelter assistance.

¹ <u>https://krdo.com/news/2021/05/11/colorado-domestic-violence-calls-increase-50-during-pandemic/</u>

HOME-ARP ACTIVITIES

The City of Colorado Springs is proposing the following activities with its HOME-ARP allocation:

	Funding Amount	Grant Percentage	Statutory Limit
Supportive Services	\$287,099	5%	
Acquisition and Development of Non-	\$1,148,396	20%	
Congregate Shelter			
Tenant Based Rental Assistance (TBRA)	\$287,099	5%	
Development of Affordable Rental	\$2,870,989	50%	
Housing			
Nonprofit Operating	\$0	0%	5%
Nonprofit Capacity Building	\$287,099	5%	5%
Administration and Planning	\$861,296	15%	15%
Total HOME-ARP Allocation	\$5,741,978	100%	

Table 10: Proposed HOME-ARP allocation

While local data and stakeholder input are the biggest influences of the Colorado Springs HOME-ARP Allocation Plan, this budget was also prepared in the context of the State of Colorado's proposed HOME-ARP allocation.

Supportive services

With over 40% of the State's HOME-ARP funds going to supportive services, the City felt it appropriate to devote local funds to capital projects, rental assistance for those exiting homelessness, and nonprofit capacity building. In response to strong demand from our local stakeholders, the City is allocating 5% of supportive service funding to subrecipients awarded construction funding for new housing or non-congregant shelter projects.

Non-congregate shelter and rental housing

The City is committing 70% (\$4 million) of HOME-ARP funds towards construction of non-congregate shelter (20%) and permanent supportive housing (50%) to provide a necessary service model for people experiencing homeless and to add critical housing stock to prevent and end homelessness for our most vulnerable.

Non-congregate shelter is a good shelter solution for multiple groups: people who are sick and actively contagious, households that cannot be accommodated together in a traditional adult shelter, people who refuse to shelter in group settings for a variety of reasons (trauma, disability, etc.), among others. While infectious diseases such as COVID and flu are here to stay, here are some stats about the other two groups who might use NCS and where to find them in the plan:

• Traditional emergency shelter has the lowest utilization rate in our community continuum (p. 10), but usage of hotel/motel vouchers through our regular ESG funding remains steady to keep families together.

- Families made up 13% of all households receiving homeless services in 2021 (p.11), though according to McKinney-Vento data (p. 20) and McKinney-Vento stakeholder feedback (p. 7), it is much smaller than the real number of families experiencing homelessness.
- Half of all homeless service users in 2021 scored high enough on the vulnerability survey that they qualify for permanent supportive housing. We can deduce from our community's high vulnerability average score that many clients might fare better in non-group settings for better outcomes with case management.

While the housing needs section shows that we urgently need to reduce our housing gap through permanently affordable rental housing, there is a place for the use of HOME-ARP funds for non-congregate shelter for the following reasons:

- Comments from the public process informed us that homeless families are undercounted (p. 7-8), they don't use the current shelters in our community (pg. 9), and that they need resources in neighborhoods besides the downtown.
- We currently only have 32 shelter beds for families escaping domestic violence (p.31)
- ESG funds are not adequate to finance the development of new shelter, nor are they flexible enough to allow shelter to convert to permanent housing, as HOME-ARP funds are.

Tenant Based Rental Assistance

The City currently partners with the Colorado Springs Housing Authority on a tenant-based rental assistance (TBRA) program for households exiting homelessness. We will fund this program with HOME-ARP funds, while using regular HOME entitlement funds to create a TBRA program to prevent homelessness for seniors.

Operating Funds

The City chose not to use HOME-ARP for operating funds to support future projects because of the availability of other funds to leverage this, such CDBG Public Services, ESG Shelter, and other philanthropic sources.

Administration and Capacity Building

Lastly, administrative and capacity building funding will be included to staff this program internally, as well as help our local housing providers prepare competitive capital project proposals.

HOME-ARP Production Goals

Estimate the number of affordable rental housing units for qualifying populations that the City will produce or support with the HOME-ARP allocation.

	Funding Amount	Units
		Created/Supported
Acquisition and Development of Non-	\$1,148,396*	150
Congregate Shelter		
Tenant Based Rental Assistance (TBRA)	\$287,099	20
Development of Affordable Rental	\$2,870,989*	300
Housing		
Admin, capacity-building, supportive	\$1,435,495	n/a
services		
Total HOME-ARP Allocation + Units	\$5,741,978	470

Table 11: Housing Units Created or Supported with HOME-ARP Funds

*Denotes assumption that HOME-ARP will provide 3% of project financing at current industry standard of \$300,000/unit

Describe specific affordable rental housing production goals

The primary goal for these funds is to add housing stock that is an appropriate resource for most households in our Coordinated Entry waiting list. The City will pursue affordable multifamily housing and permanent supportive housing projects through an RFQ process. By using other federal, state, and local finance tools, the goal is to close the housing gap for those making under 30% AMI by over 300 units.

Adding up to 150 shelter units that meets the needs of all types of households in need of wraparound services is critical in reducing the time people spend in homelessness and successfully placing them in permanent housing. Design guidelines for a non-congregate shelter project should allow, over time, easy conversion to transitional or permanent housing units, depending on community need over the long term.

The City is also reserving funding for tenant-based rental assistance (TBRA) to help households exiting homeless find and keep housing while they become more stable. The amount reserved can support up to 20 households for up to two years.

PREFERENCES

There is currently no targeted population for non-congregate shelter or affordable rental housing production aside from the qualifying populations described in this plan.

In accordance with federal and Colorado Fair Housing laws, no housing or services will be denied to anyone based on:

- Disability (a mental or physical impairment which substantially limits a major life activity)
- Race (includes hair texture, hair type, or a protective hairstyle commonly or historically associated with race, such as braids, locs, twists, tight coils or curls, cornrows, Bantu knots, Afros, and headwraps)
- Creed
- Color
- Religion
- Sex
- Sexual Orientation
- Gender Identity
- Gender Expression
- Marital Status
- Familial Status
- National Origin
- Ancestry, or
- Source of Income.

HOME-ARP REFINANCING GUIDELINES

The City of Colorado Springs does not intend to use HOME-ARP funds to refinance existing multifamily housing debt through rehabilitation activities.

139404 AFFIDAVIT OF PUBLICATION STATE OF COLORADO COUNTY OF El Paso

I, Lorre Cosgrove, being first duly sworn, deposes and says that she is the Legal Sales Representative of The Colorado Springs Gazette, LLC., a corporation, the publishers of a daily/weekly public newspapers, which is printed and published daily/weekly in whole in the County of El Paso, and the State of Colorado, and which is called Colorado Springs Gazette; that a notice of which the annexed is an exact copy, cut from said newspaper, was published in the regular and entire editions of said newspaper **1 time(s) to wit 03/29/2022**

That said newspaper has been published continuously and uninterruptedly in said County of El Paso for a period of at least six consecutive months next prior to the first issue thereof containing this notice; that said newspaper has a general circulation and that it has been admitted to the United States mails as second-class matter under the provisions of the Act of March 3, 1879 and any amendment thereof, and is a newspaper duly qualified for the printing of legal notices and advertisement within the meaning of the laws of the State of Colorado.

forre Cosque

Lorre Cosgrove Sales Center Agent

Subscribed and sworn to me this 03/29/2022, at said City of Colorado Springs, El Paso County, Colorado. My commission expires March 30, 2022.

Sandra King Notary Public The Gazette



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As the duly authorized representative of the applicant, I certify that the applicant:

- Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- 2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- 4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to:

 (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352)
 which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation

Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U. S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

- 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- 14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- 16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
John W. Suthers	Mayor
APPLICANTORGANIZATION	DATE SUBMITTED
City of Colorado Springs	05/02/2022

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NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- 4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- 9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

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- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
- Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- 19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
John W. Suthers	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Colorado Springs	5/2/22

SF-424D (Rev. 7-97) Back

View Burden Statement

OMB Number: 4040-0004 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
* 1. Type of Submission: * 2. Type of Application: Preapplication Image: Continuation Application Image: Continuation	* If Revision, select appropriate letter(s): * Other (Specify):	
Changed/Corrected Application Revision 4. Applicant Identifier: 5/2/22		
5a. Federal Entity Identifier: 5b. Federal Award Identifier:		
State Use Only:		
6. Date Received by State: 7. State Application	n Identifier:	
8. APPLICANT INFORMATION:		
* a. Legal Name: City of Colorado Springs		
* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:	
84-6000573	0783474810000	
d. Address:		
* Street1: 30 S. Nevada Ave Suite 701 Street2: Colorado Springs Countr/Decide		
County/Parish: El Paso County * State: Colorado		
State: Colorado Province:		
* Country:	USA: UNITED STATES	
* Zip / Postal Code: 80903-1898		
e. Organizational Unit:		
Department Name:	Division Name:	
Planning and Community Development	Community Development Division	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr. * First Nat Middle Name: * Last Name: Suthers Suffix:	ne: Steve	
Title: Community Development Division Manager		
Organizational Affiliation:		
* Telephone Number: 719-385-6880 Fax Number:		
* Email: mayorsoffice@coloradosprings.gov		

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
City or Township Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
U.S. Department of Housing and Urban Development
11. Catalog of Federal Domestic Assistance Number:
Ν/Α
CFDA Title:
* 12. Funding Opportunity Number:
14.239
* Title:
HOME Investment Partnership Program
13. Competition Identification Number:
N/A
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
To provide housing and housing related assistance to qualified populations through affordable housing
development, non-congregant shelter, tenant-based rental assistance, and nonprofit assistance.
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application for Federal Assistance SF	-424	
16. Congressional Districts Of:		
* a. Applicant 5	* b. Program/Project 5	
Attach an additional list of Program/Project Cong	ressional Districts if needed.	
	Add Attachment Delete Attachment View Attachment	
17. Proposed Project:		
* a. Start Date: 9/20/21	* b. End Date: 9/30/30	
18. Estimated Funding (\$):		
* a. Federal 5741978		
* b. Applicant		
* c. State		
* d. Local		
* e. Other		
* f. Program Income		
*g. TOTAL		
* 19. Is Application Subject to Review By St	ate Under Executive Order 12372 Process	
	the State under the Executive Order 12372 Process for review on	
	has not been selected by the State for review.	
c. Program is not covered by E.O. 12372.		
	ederal Debt? (If "Yes," provide explanation in attachment.	
Yes 📕 No		
If "Yes", provide explanation and attach		
	Add Attachment Delete Attachment View Attachment	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to		
	an award. I am aware that any false, fictitious, or fraudulent statements or claims may ive penalties. (U.S. Code, Title 218, Section 1001)	
X ** I AGREE		
	internet site where you may obtain this list, is contained in the announcement or agency	
specific instructions.		
Authorized Representative:		
Prefix: Mr.	* First Name: John	
Middle Name:		
* Last Name: Suthers		
Suffix:		
* Title: Mayor, City of Colorado Springs		
	Fax Number:	
Email: mayorsoffice@coloradosprings.gov Signature of Authorized Representative: Date Signed:		
John Suthus	5/3/2022	

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

Signature of Authorized Offic Mayor Title

5/3/2022 Date

RESOLUTION NO. 52 - 22

A RESOLUTION APPROVING THE HOME-ARP ALLOCATION PLAN FOR SUBMITTAL TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WHEREAS, the City of Colorado Springs ("City") is an entitlement community and receives an annual allocation of federal block grant funds from the US Department of Housing and Urban Development ("HUD") under the Community Development Block Grant Program ("CDBG"), Home Investment Partnerships Program ("HOME") and Emergency Solutions Grant ("ESG"); and

WHEREAS, as a result of the American Rescue Plan Act passed by Congress on March 11, 2021, the City received an additional allocation of federal block grant funds from HUD under the HOME program; and

WHEREAS, the purpose of the additional allocation of federal HOME grant funds through the American Rescue Plan Act is to help residents experiencing and at risk of homelessness; and

WHEREAS, as an entitlement community, the City is required by HUD to prepare an allocation plan to share the anticipated uses of the HOME-ARP funding; and

WHEREAS, HUD has provided guidance to conduct a public participation process; and

WHEREAS, City staff has met the requirements set forth in the Final HOME-ARP Implementation Notice of September 13, 2021 to create and submit the allocation plan; and

WHEREAS, as an entitlement community, the City is required by HUD to submit this allocation plan via substantial amendment to the 2021 Annual Action Plan.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF COLORADO SPRINGS:

Section 1. The City of Colorado Springs approves the proposed HOME-ARP Allocation Plan for submittal to the U.S. Department of Housing and Urban Development.

DATED at Colorado Springs, Colorado this 26th day of April, 2022.

ATTEST: Johns Saran

Council President