Moving to Work
2019 Annual Plan
Boulder Housing Partners (BHP) provides housing assistance to more than 2,000 households through five programs. The agency’s portfolio represents one third of the affordable housing units in Boulder. In 2014, BHP’s Board of Commissioners adopted a bold strategic plan which calls for doubling our portfolio in the next ten years, expanding our customer focus on children and making BHP the nation’s first net-zero energy housing authority.

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September 10, 2018   Draft released for public review
September 20, 2018   Public hearing
October 10, 2018     Approved by BHP Board of Commissioners
October 11, 2018     Submitted to HUD for approval
December 18, 2018    Comments received by HUD
January 10, 2019     Revised draft submitted to HUD
Section I: Introduction

Boulder Housing Partners (BHP) became part of the Moving to Work (MTW) Demonstration Program in 2012. This 2019 plan describes the plans for our eighth year in the demonstration.

The objectives that defined the MTW demonstration program in 1996 continue to form the core of our program goals:
1. To reduce cost and achieve greater cost effectiveness in federal expenditures;
2. To give incentives to families with children whose heads of household are either working, seeking work, or participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and
3. To increase housing choices for low-income families.

In addition to these three mandatory goals, Boulder has adopted two additional goals that are unique to Boulder’s needs:
4. Preserve, transform and revitalize our public housing; and
5. Maximize the ability of housing policy to disrupt the cycle of poverty with an intense and creative focus on children and their educational success.

In our short experience, we have come to understand that MTW flexibility will allow us to truly become a strategic organization by allowing us the flexibility to evaluate our opportunities and our challenges and respond accordingly.

Bringing School Home: Disrupting the Cycle of Poverty

In 2015, we kicked off Project Renovate, the transformation and preservation of 279 of our public housing units. Renovations were completed in 2016 and implementation of the Bringing School Home Program began. In 2016, 23 families applied and were accepted into this exciting new program that aims to break the cycle of poverty by focusing on the children. The first full year of occupancy at our preserved and transformed public housing sites was 2017.

The next ten years of Boulder’s MTW program will center on this very big idea. We believe that poverty continues to be a bar to learning and that stable, quality, and affordable housing can change that.

The first phase of the plan included the newly built and renovated community centers at our HUD subsidized affordable sites. To maximize the return on BHP’s and the community’s investment in the program, one of our 2016 MTW Activities allows us to work with a community partner that refers families to our Bringing School Home program. Families have two primary characteristics: vulnerability and at least one child under the age of six.

Our next phase involves two critical path activities:
1. Research: In cooperation with the Affordable Housing Institute, our Bringing School Home project will examine the potential for innovative housing policy to impact school outcomes. One of the many culprits in creating an achievement gap is a systemic disconnect between families and schools, schools and community, community and family. The brilliance of the “I Have a Dream” Foundation model is that it brings all the players together, through the commonality of home and neighborhood and it does so without interruption throughout the entire school career, to and through college.

2. Expansion: In addition to the evidentiary research, we will seek funding to increase Bringing School Home’s capacity by scaling up from the current 80 children actively involved to all 564 children currently living with BHP. For this phase of the project we have involved the entire community in a broader discussion under the banner of Dream Big.
Combined with all our MTW activities, BHP has set the stage for a deep examination of the leveraging power of housing policy to disrupt the cycle of poverty.

**Complete the transformation of Public Housing**

After the completion of Project Renovate, BHP continues to own 49 units of public housing in two properties, Arapahoe Court and Madison. BHP will focus on a Section 18 Demolition and Disposition action for these two properties. A disposition request for Madison has been submitted to the SAC. We intend to preserve the property as affordable housing in perpetuity. Arapahoe Court is in an area that the City of Boulder wishes to redevelop. We intend to eventually apply for a Section 18 disposition and sell Arapahoe Court to the city in exchange for other units or funding to buy or build replacement units. This will bring BHP another step closer to having one federal housing program to administer.

**Transforming Bureaucracy: People, Not Paper**

With MTW flexibility, BHP plans to be able to:

- Accelerate the shift of staff focus from paper to people,
- Complete the transformation of a public agency from bureaucratic to entrepreneurial,
- Accelerate changes in outcomes for families from tepid to catalytic,
- Enhance our role in the industry from thinkers to doers, and
- Provide a more complete continuum of housing choices.

This list of aspirations will be achieved primarily through streamlining and efficiency, thereby allowing our Housing Choice team to spend more time coaching and helping voucher households to address barriers to greater self-sufficiency.

**Increasing Housing Choice**

BHP’s strategic goal is to contribute 2,000 affordable units to Boulder’s permanently affordable inventory in ten years. To meet this goal, we will need to use maximum MTW flexibility. We will consider creative use of Replacement Housing Factor Funds (RHFF) and Demolition or Disposition Transitional Funding (DDTF); strategic use of project-based vouchers (PBV); consideration of shallow subsidies; experimentation with rapid re-housing; and creative partnerships with the private sector.
Section II: General Housing Authority Operating Information

The following tables describe housing options under the Public Housing and Housing Choice Programs. There are currently 49 total units in the public housing program and 891 total vouchers in the MTW voucher program.

**A. HOUSING STOCK INFORMATION**

1. **Planned New Public Housing Units**
   - New public housing units that the MTW PHA anticipates will be added during the Plan Year.

2. **Planned Public Housing Units to be Removed**
   - Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

3. **Planned New Project Based Vouchers**
   - Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year.

4. **Planned Existing Project Based Vouchers**
   - Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year.

### Table 1: Housing Stock Information

<table>
<thead>
<tr>
<th>Asset Management Project (AMP) Name and Number</th>
<th>Bedroom Size</th>
<th>Total Units</th>
<th>Population Type*</th>
<th># of Uniform Federal Accessibility Standards (UFAS) Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>0/1</td>
<td>0</td>
<td>0</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>0</td>
<td>0</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>0</td>
<td>0</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>5</td>
<td>0</td>
<td>0</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>6+</td>
<td>0</td>
<td>0</td>
<td>N/A</td>
</tr>
</tbody>
</table>

| Total Public Housing Units to be Added in the Plan Year | 0 |

* Select “Population Type” from: General, Elderly, Disabled, Elderly/Disabled, Other

If “Population Type” is “Other” please describe:

N/A

### Table 2: Planned Public Housing Units to be Removed

<table>
<thead>
<tr>
<th>AMP Name and Number</th>
<th>Number of Units to Be Removed</th>
<th>Explanation for Removal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Madison/CO0163333333</td>
<td>34</td>
<td>BHP applied for Section 18 Disposition and expects to hear from the SAC in the fall of 2018. Goal will be to preserve Madison as affordable housing into perpetuity.</td>
</tr>
</tbody>
</table>

| Total Public Housing Units to be Removed in the Plan Year | 34 |

### Table 3: Planned New Project Based Vouchers

<table>
<thead>
<tr>
<th>Property Name</th>
<th>Number of Vouchers to Be Project-Based</th>
<th>RAD?</th>
<th>Description of Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Madison</td>
<td>34</td>
<td>No</td>
<td>BHP applied for Section 18 Disposition and expects to hear from the SAC in the fall of 2018. Goal will be to preserve Madison as affordable housing into perpetuity.</td>
</tr>
</tbody>
</table>

<p>| Planned Total Vouchers to be Newly Project-Based | 34 |</p>
<table>
<thead>
<tr>
<th>PROPERTY NAME</th>
<th>NUMBER OF PROJECT-BASED VOUCHERS</th>
<th>PLANNED STATUS AT END OF PLAN YEAR*</th>
<th>RAD?</th>
<th>DESCRIPTION OF PROJECT</th>
</tr>
</thead>
<tbody>
<tr>
<td>1175 Lee Hill</td>
<td>31</td>
<td>31</td>
<td>No</td>
<td>Permanently supportive housing for the chronically homeless</td>
</tr>
<tr>
<td>Broadway East</td>
<td>44</td>
<td>44</td>
<td>No</td>
<td>Public housing units converted in 2006</td>
</tr>
<tr>
<td>Diagonal Court</td>
<td>30</td>
<td>30</td>
<td>Yes</td>
<td>Public housing converted in 2015</td>
</tr>
<tr>
<td>Holiday McKinney</td>
<td>10</td>
<td>10</td>
<td>No</td>
<td>Permanently supportive housing for the chronically homeless</td>
</tr>
<tr>
<td>Iris Hawthorn</td>
<td>14</td>
<td>14</td>
<td>Yes</td>
<td>Public housing converted in 2015</td>
</tr>
<tr>
<td>Kalmia</td>
<td>49</td>
<td>49</td>
<td>No</td>
<td>Public housing converted in 2015</td>
</tr>
<tr>
<td>Manhattan</td>
<td>41</td>
<td>41</td>
<td>Yes</td>
<td>Public housing converted in 2015</td>
</tr>
<tr>
<td>Northport</td>
<td>50</td>
<td>50</td>
<td>Yes</td>
<td>Public housing converted in 2015</td>
</tr>
<tr>
<td>Walnut Place</td>
<td>95</td>
<td>95</td>
<td>No</td>
<td>Public housing converted in 2015</td>
</tr>
<tr>
<td>Woodlands</td>
<td>35</td>
<td>35</td>
<td>No</td>
<td>Property has a Family Self Sufficiency Program with partner agency</td>
</tr>
</tbody>
</table>

| Planned Total Existing Project-Based Vouchers | 399 |

* Select “Planned Status at the End of Plan Year” from: Committed, Leased/Issued

v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year
Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

<table>
<thead>
<tr>
<th>PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
</tr>
</tbody>
</table>

vi. General Description of All Planned Capital Expenditures During the Plan Year
Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

<table>
<thead>
<tr>
<th>GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR</th>
</tr>
</thead>
<tbody>
<tr>
<td>We expect to spend the allocation associated with Arapahoe Court for general maintenance on the property. No major capital expenditures are planned. The Madison allocation and any remaining allocation from previous years will be accumulated for potential unit acquisitions in accordance with Activity 2015-1.</td>
</tr>
</tbody>
</table>

B. LEASING INFORMATION

i. Planned Number of Households Served
Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.
### Planned Number of Households Served

<table>
<thead>
<tr>
<th>PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:</th>
<th>PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*</th>
<th>PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**</th>
</tr>
</thead>
<tbody>
<tr>
<td>MTW Public Housing Units Leased</td>
<td>564</td>
<td>47</td>
</tr>
<tr>
<td>MTW Housing Choice Vouchers (HCV) Utilized</td>
<td>10,692</td>
<td>891</td>
</tr>
<tr>
<td>Local, Non-Traditional: Tenant-Based^</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Local, Non-Traditional: Property-Based^</td>
<td>120</td>
<td>10</td>
</tr>
<tr>
<td>Local, Non-Traditional: Homeownership^</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Planned Total Households Served</td>
<td>11,376</td>
<td>948</td>
</tr>
</tbody>
</table>

* "Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.

** "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year.

^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

### Local, Non-Traditional Category

<table>
<thead>
<tr>
<th>LOCAL, NON-TRADITIONAL CATEGORY</th>
<th>MTW ACTIVITY NAME/NUMBER</th>
<th>PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*</th>
<th>PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tenant-Based</td>
<td>N/A</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Property-Based</td>
<td>Affordable housing acquisition and development fund/2015-1</td>
<td>120</td>
<td>10</td>
</tr>
<tr>
<td>Homeownership</td>
<td>N/A</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

* The sum of the figures provided should match the totals provided for each local, non-traditional category in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

#### ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

<table>
<thead>
<tr>
<th>HOUSING PROGRAM</th>
<th>DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>MTW Public Housing</td>
<td>Madison may be disposed from the Public Housing Program this year, wait lists are currently closed.</td>
</tr>
<tr>
<td>MTW Housing Choice Voucher</td>
<td>There are no anticipated issues with leasing in the HCV program.</td>
</tr>
<tr>
<td>Local, Non-Traditional</td>
<td>There are no anticipated issues with leasing the local, non-traditional units.</td>
</tr>
</tbody>
</table>
C. WAITING LIST INFORMATION

i. Waiting List Information Anticipated
Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The “Description” column should detail the structure of the waiting list and the population(s) served.

<table>
<thead>
<tr>
<th>WAITING LIST NAME</th>
<th>DESCRIPTION</th>
<th>NUMBER OF HOUSEHOLDS ON WAITING LIST</th>
<th>WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED</th>
<th>PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR</th>
</tr>
</thead>
<tbody>
<tr>
<td>HCV Lottery</td>
<td>Lottery for all applicants</td>
<td>0</td>
<td>Closed</td>
<td>Yes</td>
</tr>
<tr>
<td>Madison</td>
<td>Site based wait list</td>
<td>883</td>
<td>Closed</td>
<td>If needed</td>
</tr>
<tr>
<td>Arapahoe</td>
<td>Site based wait list</td>
<td>616</td>
<td>Closed</td>
<td>If needed</td>
</tr>
</tbody>
</table>

Please describe any duplication of applicants across waiting lists:
483 applicants are on both the Madison and Arapahoe lists.

ii. Planned Changes to Waiting List in the Plan Year
Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

<table>
<thead>
<tr>
<th>WAITING LIST NAME</th>
<th>DESCRIPTION OF PLANNED CHANGES TO WAITING LIST</th>
</tr>
</thead>
<tbody>
<tr>
<td>HCV Lottery</td>
<td>Lottery will open in 2019.</td>
</tr>
<tr>
<td>Madison</td>
<td>If disposition occurs, this wait list will be dissolved.</td>
</tr>
</tbody>
</table>
Section III: Proposed MTW Activities

Boulder Housing Partners is not proposing any new activities for 2019.

Section IV: Approved MTW Activities

**Implemented**

**Activity 2012-4: Rent simplification for all households**

The goal of this activity is to implement a series of changes to simplify the income and asset verification process for all families. This activity was first identified and approved in 2012 and included allowing households to provide asset and income documentation; excluding income from assets and allowing for self-certification of assets that total $50,000 or less; and limiting total household assets to $50,000 or less upon admissions to the public housing and Housing Choice program. This activity was approved and implemented for 2012.

BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2012-5: Eliminate the 40% of income cap in the voucher program**

Increasing housing choices for Housing Choice Voucher holders is the goal of this activity and is accomplished by eliminating the 40% of income towards rent cap when they initially lease up. This activity was approved and implemented in 2012.

BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2012-6: Implement a flat utility allowance for the voucher program**

This activity’s main objective is to increase voucher holder’s ease of understanding of the rent calculation and how utilities affect the maximum contract rent allowed. This activity was approved and implemented in 2012.

BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2013-1: Housing Quality Standards (HQS) Inspection Schedule**

Written to replace Activity 2012-7, this activity aligns the HQS inspection schedule with the recertification schedule. Beginning in 2013, for all households who are elderly or a person with disabilities, the inspection schedule now follows the recertification schedule which is conducted every three years. Beginning in 2014, inspections for the work-abled family households were aligned with the recertification schedule, which is every two years. This activity was approved and implemented in 2013.

BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2013-2: Eliminate Utility Reimbursement Payments**

The focus of this activity was to ensure that all public housing residents and Housing Choice Voucher participants are contributing towards their rental payment (or at a minimum to ensure that residents and participants are not
receiving payment to live on housing assistance). Households who had been receiving a utility reimbursement payment (URP) in April 2013 were grandfathered in for 12 months. No new instances of URP were allowed after April 1, 2013. This activity was approved and implemented in 2013.

BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2013-3: Local voucher program in partnership with Safehouse Progressive Alliance for Nonviolence**

Partnering with Safehouse Progressive Alliance for Nonviolence (SPAN), this activity, which provides eight families who are victims of domestic violence with housing assistance through BHP and case management services through SPAN, allows BHP to use vouchers for transitional housing. This activity was approved and implemented in 2013.

BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2013-4: Use of Replacement Housing Factor Funds for other affordable housing**

This activity allows BHP to use Replacement Housing Factor (RHF) Funds to build other affordable housing units. In 2014, BHP used RHF Funds at 1175 Lee Hill, a 31-unit community for chronically homeless using the Housing First model. These units were completed and fully leased by the end of 2014. This activity was approved in 2013 and first utilized in 2014.

BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2014-4: Removal of flat rent option for all public housing households**

All public housing households now pay rent according to their income, and under this activity no longer have the option to choose the flat rent in cases where their rent based on income is higher. Households were given six months’ notice of what their rent would be based on their income and the new rent went into effect at their next regularly scheduled recertification. This activity was approved and implemented in 2014.

BHP’s inventory of public housing units was greatly reduced in 2015. However, this activity will remain in effect for the remaining public housing units at Arapahoe Court and Madison. No changes to the activity or metrics are anticipated in 2019.

**Activity 2014-5: Changes in mobility options for the Woodlands Family Self-Sufficiency Program**

This activity changed the mobility options for households living at Woodlands, a Project-Based Voucher community. Households must remain at the property for a minimum of three years, and a maximum of five years prior to requesting the next available voucher. The household must also be in good standing with the Family Self-Sufficiency Program to receive the next available voucher. This activity was approved and implemented in 2014.

BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2015-1: Affordable housing acquisition and development fund**

BHP’s Strategic Plan calls for adding 2,000 affordable units in the next 10 years. This activity will allow us to reach that goal by using MTW funds to support affordable housing acquisition and development in the city of Boulder. In 2016, this fund was used to supplement the purchase of one building (6 units) of affordable housing and 4.597 acres of land.
to be used for future development. In 2017, this activity was used to purchase 4 units of affordable housing. This activity was approved and implemented in 2015.

BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2016-1: Flat tiered rent for Housing Choice work-abled families**

Changes were made to the original flat tiered rent activity 2014-1 and incorporated into this activity. Rents in the tiers 2 – 15 were increased by approximately 5% and the flat fee per ineligible family member decreased to $125. The recertification schedule was also updated to divide the work-abled families into two groups: tenant based versus project based. The tenant-based work-abled families recertify every even year effective June 1. The project-based work-abled families recertify every odd year effective October 1. Due to the two groups recertifying every other year, metrics will only reflect the group that was recertified in that year. This activity was approved and implemented in 2016.

BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2016-2: Rent reform for the elderly households and persons with disabilities**

Activity 2012-2 simplified the rent calculation for elderly households and people with disabilities who are living on a fixed income. The activity focused on four areas: 1) rent based on 26.5% of gross income; 2) triennial recertifications; 3) income disregard and 4) limit on interim decreases.

Activity 2014-3 limited interim decrease recertifications to one per year during the triennial recertification cycle and eliminated all interims for any increase in income, including new sources.

Activity 2016-2 added the ineligible family member fee to the rent calculation for mixed eligible families, which allows BHP to treat all mixed citizen households the same. Instead of pro-rating assistance for these families, a flat fee per ineligible family member of $125 is added to the total tenant payment for each household member who is not legally eligible to receive housing assistance.

All elements of these activities were incorporated into Activity 2016-2, which was approved and implemented in 2016. BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2016-3: Landing landlords**

BHP operates in an exceptionally tight rental market. This activity aims to increase housing choices by providing an incentive for new landlords to participate in the program, establishing a revolving security deposit loan fund for new participants and a damage claim fund for landlords, and restricting moves for current participants who are not in program compliance. This activity was approved in 2016 and was fully implemented in 2018.

BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2016-4: Bringing School Home referral process**

By focusing on children younger than age six, BHP is hoping to break the cycle of poverty. With the collaboration of a community partner, families who are vulnerable and have a child under the age of six are referred to BHP to receive housing and services at the sites where the Bringing School Home program is offered. This activity was approved and implemented in 2016.
BHP does not anticipate any changes to the activity or its metrics in 2019.

**Activity 2018-1: Project-Based Voucher Waivers**

This activity incorporates all the activities that have been approved and implemented since becoming a Moving to Work Agency. The approved elements include:

- **Waive the 20% cap on project-based vouchers**: originally part of Activity 2012 – 1, this allows BHP to project base more than 20% of our voucher authority.

- **Definition of excepted units**: originally part of Activity 2012 – 1, this allows BHP to project base vouchers at 100% of the units in advance of offering services.

- **Waive the competitive bidding process**: originally part of Activity 2012 – 1, this requirement is waived when BHP is placing vouchers in a project owned by BHP.

- **Rent limits and rent reasonableness**: originally Activity 2014 – 6, this allows BHP to establish appropriate rent limits and conduct our own rent reasonableness tests for our project-based voucher contracts.

- **Allow owner/service partner to hold wait list**: originally Activity 2015 – 2, BHP allows the owner or the service partner at all project-based voucher sites to hold the wait list and refer participants to BHP’s Housing Choice Voucher Department.

- **Allow BHP staff to conduct Housing Quality Standards inspections at our PBV units**: this was part of activity 2018-1, which was approved and implemented in 2018.

- **Allow participants at our project-based voucher sites who are no longer receiving housing assistance payments to remain on the voucher**: this was part of activity 2018-1, which was approved and implemented in 2018.

- **Allow participant families to continue to pay rent according to their income**: this was part of activity 2018-1, which was approved and implemented in 2018.

BHP does not anticipate any changes to the activity or its metrics in 2019.

**Not Yet Implemented**

BHP does not have any approved activities that have not yet been implemented.

**On Hold**

BHP does not have any approved activities that are on hold.
Closed Out

**Activity 2012-1: Allow BHP to commit project-based vouchers to cover 100% of the units at converted public housing developments**

This activity was approved in 2012, implemented in 2013. This activity was incorporated into MTW Activity 2018-1: Project-Based Vouchers Waivers in order to consolidate all the project-based voucher waivers into one activity. The elements of this activity are still active within the 2018 activity, this standalone activity was closed out in 2018.

**Activity 2012-2: Rent simplification specifically for elderly households and people with disabilities**

This activity was approved and implemented in 2012. Additional aspects were added to this activity with Activity 2014-3. All elements of this activity were consolidated into MTW Activity 2016-2. This activity was closed out in 2016.

**Activity 2012-3: Rent simplification specifically for family households**

This activity was approved and implemented in 2012. Additional aspects were added to this activity with Activity 2014-1. This activity was incorporated into MTW Activity 2016-1. This activity was closed out in 2016.

**Activity 2012-7: Implement a landlord self-certification system for HQS inspections for the voucher program**

This activity was approved in 2012 but was never implemented as it had been written. The 2012 activity placed a greater burden on landlords to self-certify to HQS standards which they may not be familiar with and was not the original intent of the activity. It was re-written and approved in the 2013 MTW Annual Plan under Activity 2013 – 1. This activity was closed out in 2012.

**Activity 2014-1: Rent reform for Housing Choice Work-Abled Families**

This activity was approved and implemented in 2014. This activity was added to and re-proposed as Activity 2016-1. All the elements of this activity were included in 2016-1. This activity was closed out in 2016.

**Activity 2014-2: Rent reform for public housing work-abled families**

This activity was approved in 2014. BHP received approval for conversion of the Public Housing units in 2014, and conversion of more than 80% of the public housing to the voucher program occurred in 2015. BHP is applying for disposition of the remaining public housing units and decided not to implement this activity, as it would only affect a small group of families who eventually will be converting to the voucher program. Therefore this activity was never implemented. This activity was closed out in 2014.

**Activity 2014-3: Limit of one interim decrease recertification per year for elderly households and persons with disabilities**

This activity was approved and implemented in 2014. This activity was incorporated into MTW Activity 2016-2 and closed out in 2016.
**Activity 2014-6: Rent limits and rent reasonableness for project-based vouchers**

BHP uses market studies to establish appropriate rent limits and conducts its own rent reasonableness procedures. This activity was approved and implemented in 2014. This activity was incorporated into Activity 2018-1 and was closed out in 2018.

**Activity 2015-2: Project-based voucher applicant process**

This activity was approved and implemented in 2015. All aspects of this activity are incorporated into MTW Activity 2018-1: Project-Based Vouchers Waivers and was closed out in 2018.
### Section V: MTW Sources and Uses of Funds

#### A. Estimated Sources and Uses of MTW Funds

**i. Estimated Sources of MTW Funds**

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

<table>
<thead>
<tr>
<th>FDS LINE ITEM NUMBER</th>
<th>FDS LINE ITEM NAME</th>
<th>DOLLAR AMOUNT</th>
</tr>
</thead>
<tbody>
<tr>
<td>70500 (70300+70400)</td>
<td>Total Tenant Revenue</td>
<td>296,000</td>
</tr>
<tr>
<td>70600</td>
<td>HUD PHA Operating Grants</td>
<td>7,283,576</td>
</tr>
<tr>
<td>70610</td>
<td>Capital Grants</td>
<td>370,000</td>
</tr>
<tr>
<td>70700 (70710+70720+70730+70740+70750)</td>
<td>Total Fee Revenue</td>
<td>0</td>
</tr>
<tr>
<td>71100+72000</td>
<td>Interest Income</td>
<td>1,800</td>
</tr>
<tr>
<td>71600</td>
<td>Gain or Loss on Sale of Capital Assets</td>
<td>0</td>
</tr>
<tr>
<td>71200+71300+71310+71400+71500</td>
<td>Other Income</td>
<td>35,000</td>
</tr>
<tr>
<td>70000</td>
<td>Total Revenue</td>
<td>7,986,376</td>
</tr>
</tbody>
</table>

**ii. Estimated Uses of MTW Funds**

The MTW PHA shall provide the estimated uses and amount of MTW spending by Financial Data Schedule (FDS) line item.

<table>
<thead>
<tr>
<th>FDS LINE ITEM NUMBER</th>
<th>FDS LINE ITEM NAME</th>
<th>DOLLAR AMOUNT</th>
</tr>
</thead>
<tbody>
<tr>
<td>91000 (91100+91200+91400+91500+91600+91700+91800+91900)</td>
<td>Total Operating - Administrative</td>
<td>800,000</td>
</tr>
<tr>
<td>91300+91310+92000</td>
<td>Management Fee Expense</td>
<td>5,640</td>
</tr>
<tr>
<td>91810</td>
<td>Allocated Overhead</td>
<td>0</td>
</tr>
<tr>
<td>92500 (92100+92200+92300+92400)</td>
<td>Total Tenant Services</td>
<td>23,000</td>
</tr>
<tr>
<td>93000 (93100+936000+93200+93300+93400+93800)</td>
<td>Total Utilities</td>
<td>54,000</td>
</tr>
<tr>
<td>93500+93700</td>
<td>Labor</td>
<td>0</td>
</tr>
<tr>
<td>94000 (94100+94200+94300+94500)</td>
<td>Total Ordinary Maintenance</td>
<td>160,000</td>
</tr>
<tr>
<td>95000 (95100+95200+95300+95500)</td>
<td>Total Protective Services</td>
<td>7,500</td>
</tr>
<tr>
<td>96100 (96110+96120+96130+96140)</td>
<td>Total Insurance Premiums</td>
<td>38,236</td>
</tr>
<tr>
<td>96000 (96200+96210+96300+96400+96500+96600+96800)</td>
<td>Total Other General Expenses</td>
<td>30,000</td>
</tr>
<tr>
<td>96700 (96710+96720+96730)</td>
<td>Total Interest Expense &amp; Amortization Cost</td>
<td>0</td>
</tr>
<tr>
<td>97100+97200</td>
<td>Total Extraordinary Maintenance</td>
<td>0</td>
</tr>
<tr>
<td>97300+97350</td>
<td>HAP + HAP Portability-In</td>
<td>6,865,000</td>
</tr>
<tr>
<td>97400</td>
<td>Depreciation Expense</td>
<td>65,000</td>
</tr>
<tr>
<td>97500+97600+97700+97800</td>
<td>All Other Expense</td>
<td>3,000</td>
</tr>
<tr>
<td>90000</td>
<td>Total Expenses</td>
<td>8,061,376</td>
</tr>
</tbody>
</table>

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:

Expenses exceed revenue by the Depreciation amount
iii. Description of Planned Use of MTW Single Fund Flexibility
The MTW PHA shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).

<table>
<thead>
<tr>
<th>PLANNED USE OF MTW SINGLE FUND FLEXIBILITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>BHP plans to use DDT funds for Kalmia and Walnut Place to acquire or develop other local affordable housing.</td>
</tr>
</tbody>
</table>

B. LOCAL ASSET MANGEMENT PLAN

i. Is the MTW PHA allocating costs within statute? Yes

ii. Is the MTW PHA implementing a local asset management plan (LAMP)? No

iii. Has the MTW PHA provide a LAMP in the appendix? No

iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

N/A

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

i. Description of RAD Participation
The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

<table>
<thead>
<tr>
<th>RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>BHP converted 283 units of PH under RAD effective 10/1/2015.</td>
</tr>
</tbody>
</table>

ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval. No

iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

N/A
Section VI: Administrative

Board Resolution Submittal

Resolution starts on the following page.
CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING

Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2019), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

(1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.

(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.

(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).

(4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.

(5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA’s jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.

(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

(9) In accordance with 24 CFR 5.105(a)(2), HUD’s Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.


(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, SubpartF.

(13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
(14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

(15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women’s business enterprises under 24 CFR 5.105(a).

(16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.

(17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

(18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

(19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

(20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.

(21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

(22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Boulder Housing Partners

<table>
<thead>
<tr>
<th>MTW PHA NAME</th>
<th>CO016</th>
</tr>
</thead>
</table>

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

R.E. Harris  
Board Vice Chair

NAME OF AUTHORIZED OFFICIAL  

SIGNATURE  

DATE

* Must be signed by either the Chairman or Secretary of the Board of the MTW PHA’s legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.
**Public Review**

This 2019 MTW Annual Plan was made public for review from September 10, 2018 through October 9, 2018. The Plan was posted to our website. One public hearing was held on September 20, 2018. There were no public housing residents or Housing Choice participants who attended, and no public comments were received.

**Agency-Directed Evaluation of the Demonstration**

BHP is working in partnership with the University of Colorado (CU) to develop and implement the rent-controlled study to evaluate the effects of the rent reform structures that were put into place in 2014. Questionnaires were sent to all work-abled families in both the Public Housing and Housing Choice Programs to gather baseline data in 2014. The results from the baseline data were shared in the 2014 MTW Annual Report. This study is designed to follow these families over the course of 10 – 12 years to measure progress towards self-sufficiency in ten different domains. The questionnaires will be administered every other year to provide comparison within each subject group, which will help determine the services that BHP will focus on offering. The details of the study can be found in BHP’s 2014 MTW Annual Plan. The results for each year can be found in the MTW Annual Report.

BHP’s work with respect to MTW Activity 2016 – 4 - Bringing School Home is based on a twenty-year partnership between BHP and the "I Have a Dream" Foundation of Boulder County. BSH is a comprehensive and partner-based education intervention that follows the cradle to career model. Our work to develop the theory of impact related to deploying housing as a platform for educational system change is sponsored and supported by the Affordable Housing Institute (AHI). AHI quickly recognized the potential for BHP to contribute to long-term public-school system change using its MTW flexibility. Together the two organizations will examine the potential for innovative housing policy to impact school outcomes. One of the many culprits in creating an achievement gap is a systemic disconnect between families and schools, schools and community, community and family. The brilliance of a Bringing School Home model is that it brings all the players together, through the commonality of home and neighborhood and it does so without interruption throughout the entire school career, to and through college.

BHP is actively seeking funding for research. Once obtained, the Urban Institute is committed to supporting BHP and "I Have a Dream” to research what’s working in using housing as a platform to close the achievement gap, testing the Bringing School Home model.

We will ask:

- What are the greatest points of leverage in housing policy to help schools produce world-ready employable adults?
- How does neighborhood and place contribute to school success?
- Can a program like “I Have a Dream” Foundation achieve its success without a housing component?
- What other systems need to conform and interact so that education becomes a true path out of poverty?
- What will it take to bring the existing two successful models to scale?

The evidentiary research program is straightforward. It will consist of:

- On-site analysis of the BSH model to understand program determinants for success
• Review of the housing-education research with a focus on these key triads:
  o Stability-mobility-school performance
  o Quality-harm reduction-school attendance
  o Affordability-investment-success
  o Trust-confidence-parent engagement and buy-in
  o Place-connections-aspirational social networks
  o Commitment-dreams-achievement

Lobby Disclosures

Disclosure of Lobbying Activities (SF-LLL) and Certification of Payments (HUD-50071) can be found starting on the next page.