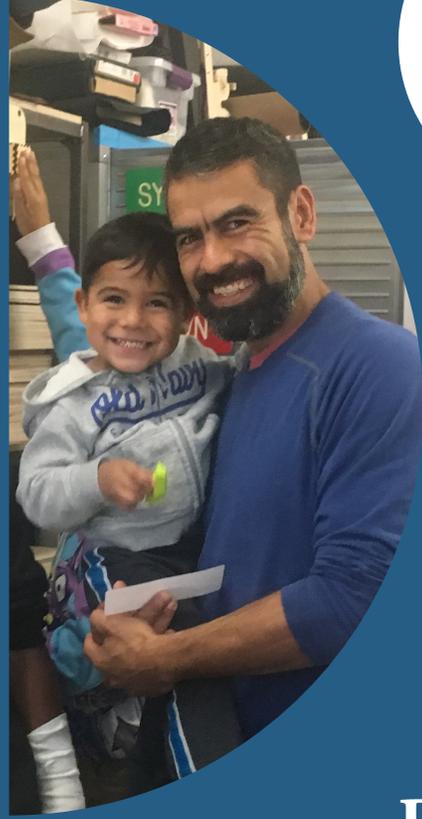




# Moving to Work

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## 2020 Annual Plan



**Boulder  
Housing  
Partners** 



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.

## Board of Commissioners

Valerie Soraci, *Chair*  
Dick Harris, *Vice Chair*  
Tony Adams  
Pamela Griffin  
Karen Klerman  
Claire Levy  
Nikki McCord  
Bob Walker  
Bob Yates

## Executive Director

Jeremy Durham

## Senior Management

Jodi Bogen, *Chief Financial Officer*  
Laura Sheinbaum, *Director of Real Estate Development*  
Penny Hannegan, *Director of HR and Organizational Excellence*  
René Brodeur, *Director of Operations*  
Tim Beal, *Director of Sustainability*  
Karen Kreutzberg, *Moving to Work and Federal Policy Director*

# Boulder Housing Partners

## 2020 MTW Annual Plan

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September 9, 2019      Draft released for public review

September 18, 2019    Public hearing

October 16, 2019      Approved by BHP Board of Commissioners

October 16, 2019      Submitted to HUD for approval

December 13, 2019    Received revision requests from HUD

December 30, 2019    Revisions submitted to HUD for final approval

# Section I: Introduction

Boulder Housing Partners (BHP) became part of the Moving to Work (MTW) Demonstration Program in 2012. This 2020 Plan describes the plans for our ninth 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 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 we began implementing the Bringing School Home program. Since 2016, 143 families have applied and participated in this exciting program that aims to break the cycle of poverty by providing service-enriched housing that focuses on children's educational outcomes and parents' economic stability.

The next ten years of Boulder's MTW program will center on this very big idea. We believe that poverty continues to be a barrier 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, we began working with the Emergency Family Assistance Association (EFAA), 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.

In cooperation with the Affordable Housing Institute, our Bringing School Home program continues to explore 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.

We continue to seek funding to increase Bringing School Home's capacity by scaling up to be able to reach all 616 children currently living with BHP. 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. Disposition was approved for Madison and will occur in 2020. The property will undergo renovations and convert to a low-income tax credit property with project-based vouchers attached to continue to serve the same demographic of households who are currently living there. 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 by 2024. To meet this goal, we will need to use maximum MTW flexibility. We will consider additional initiatives under the Landing Landlords Activity; creative use of Demolition or Disposition Transitional Funding; strategic use of project-based vouchers; 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

### i. Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A	0	0	0	0	0	0	0	N/A	N/A	N/A

Total Public Housing Units to be Added in the Plan Year

\* Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other

If "Population Type" is "Other" please describe:

### ii. Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Madison/CO016333333	34	BHP received Section 18 Disposition approval for Madison in May 2019. We are moving forward with plans for a tax credit acquisition and rehabilitation in September 2020.

Total Public Housing Units to be Removed in the Plan Year

### iii. Planned New Project Based Vouchers

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year.

These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) will be in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Madison	34	No	BHP will apply for tenant protection vouchers to use at the converted public housing site.
30Pearl	20*	No	* BHP will enter into an AHAP by the end of 2020; however, vouchers will not be placed until construction is completed in 2021. These units will serve the developmentally disabled.

Planned Total Vouchers to be Newly Project-Based

**iv. Planned Existing Project Based Vouchers**

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
1175 Lee Hill	31	31	No	Permanently supportive housing for the chronically homeless
Broadway East	44	44	No	Public housing units converted in 2006
Diagonal Court	30	30	Yes	Public housing converted in 2015
Holiday McKinney	10	10	No	Permanently supportive housing for the chronically homeless
Iris Hawthorn	14	14	Yes	Public housing converted in 2015
Kalmia	49	49	No	Public housing converted in 2015
Manhattan	41	41	Yes	Public housing converted in 2015
Northport	50	50	Yes	Public housing converted in 2015
Walnut Place	95	95	No	Public housing converted in 2015
Woodlands	35	35	No	Property has a Family Self Sufficiency Program with partner agency

**399**

**Planned Total Existing Project-Based Vouchers**

\* 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.

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
The public housing property Madison will be disposed of in 2020 and converted to a tax credit project with project-based vouchers. Due to extensive renovations, vacancies will be held beginning in January. Units will convert from public housing to tenant protection vouchers at the time of conversion, expected to occur in September 2020.

**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.

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR
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.

**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 THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	442	37
MTW Housing Choice Vouchers (HCV) Utilized	10,826	902
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	240	20
Local, Non-Traditional: Homeownership^	0	0
<b>Planned Total Households Served</b>	<b>11,508</b>	<b>959</b>

\* “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	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	N/A	0	0
Property-Based	Affordable housing acquisition and development fund/2015-1	240	20
Homeownership	N/A	0	0

\* 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.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	Madison will be disposed from the Public Housing Program in September 2020. Due to extensive renovations occurring after conversion, vacancies will be held beginning January 2020, which will affect the number of households served in 2020 and 2021.
MTW Housing Choice Voucher	With the disposition of Madison, households will receive tenant protection vouchers, which will increase the number of households served in this program, while decreasing the number in public housing.
Local, Non-Traditional	There are no anticipated issues with leasing the local, non-traditional units.

**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.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
HCV Lottery	Lottery for all applicants	100	Closed	Yes
Madison	Site based wait list	974	Closed	If needed
Arapahoe	Site based wait list	526	Closed	If needed

Please describe any duplication of applicants across waiting lists:

405 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.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
HCV Lottery	Beginning in 2020, the lottery will open three times per year in the months of February, June and October.
Madison	If disposition occurs, the PH wait list will be used to fill the renovated units prior to opening a new wait list for the converted units.

## Section III: Proposed MTW Activities

### Activity 2020 – 1: FSS Rent and Escrow Calculations

#### A. MTW Activity Description

The goal is to modify both the rent and escrow calculations for the Family Self-Sufficiency (FSS) Program. Boulder Housing Partners (BHP) works in partnership with Boulder County Housing Authority (BCHA) to offer the FSS Program to all households living at Woodlands Community, consisting of 35 units of 2-, 3- and 4-bedroom townhomes with a community center and Head Start facility on site. BHP provides project-based voucher rental assistance, while BCHA provides FSS case management. The FSS program is designed to increase self-sufficiency over a five-year period and reduce dependency on welfare and rental assistance.

The current method of calculating escrow was developed over 20 years ago. Today, we find the escrow calculation to be confusing and complex, with many participants not understanding the calculation and therefore unsure of what the goal is to earn escrow. Escrow is accumulated based on increases in a participant's total tenant payment that are based on increases in earned income only. There are inequalities in the growth of the escrow since ability to earn escrow is based on the amount of income a family has when entering the program. For participating families who enter the program with no or very low incomes, this asset can build at a higher rate than a family who enters the program with low to moderate incomes. Since higher income earners have a stronger potential for moving out of subsidized housing, the proposed changes aim to help make that a possibility for more participants by equalizing the opportunity to build escrow, rather than penalizing families who enter the program with moderate incomes.

**Rent calculation:** The elements of the proposed rent calculation are the same as the current work-abled family flat tiered rent structure (as implemented under Activity 2016-1). By using the same rent calculation that is currently in place, BHP will provide consistency across the board for all work-abled families participating in BHP's Housing Choice Voucher program, while continuing to provide an opportunity to earn escrow. This rent structure mimics the market as participants pay more for a larger unit, while removing the disincentive to increase income by requiring participants to report the increase within 10 business days and receiving a corresponding increase in rent within 30 days. It also incentivizes and rewards work by closing the loophole in which participants can strategically reduce income to receive a lower rent.

The rent calculation includes the following elements:

- *Flat tiered rent system:* total tenant payment is calculated using a two-step system. Based on family size and gross income, the family falls into an income tier. The income tier and the size of the unit determine the total tenant payment for the family. From this amount, if applicable, the utility allowance is subtracted, a flat fee per ineligible family member is added, and any amount the gross rent is above the payment standard is added. Tiered charts can be found at the end of this section.
- *Minimum rent:* the minimum rent is based on bedroom size and ranges from \$120 - \$180.
- *Biennial recertification:* households will be certified upon admission to the program. They will recertify at the beginning of year 3 and again at year 5. At certification and recertification, rent will be based on:
  1. Current gross income if it is stable and predictable (defined as income that is not temporary, expected to continue for the foreseeable future and not seasonal in nature), or
  2. Past 2 years of gross income (annualized) if it is not stable or no income is being reported

- *No interim recertification:* all interim recertifications are eliminated except for family composition or status changes, or if the family moves. If the household is claiming income that places them in income tier one, all increases in income must be reported until the family falls into income tier two. Exceptions will be made to this policy based on reasonable accommodation requests and extenuating circumstances. Requests will be reviewed on a case-by-case basis. If circumstances do not qualify the family for a rent adjustment, they may be referred to the Safety Net Fund administered by the Emergency Family Assistance Association.
- *Flat fee per ineligible family member:* for those members who are not legally able to receive housing assistance, a flat fee per member of \$125 per month is added to their total tenant payment

**Income Tier Chart**

Income Tier	Family Size									
	1	2	3	4	5	6	7	8	9	10
1	\$ -	-	-	-	-	-	-	-	-	-
2	4,000	4,200	4,400	4,600	4,800	5,000	5,400	6,000	6,400	6,800
3	5,500	5,700	6,700	7,300	7,900	8,400	8,900	8,900	9,500	10,100
4	7,200	8,300	9,300	10,400	11,300	12,200	13,000	13,900	14,800	15,700
5	10,900	12,400	14,000	15,500	16,800	18,000	19,200	20,500	21,800	23,200
6	14,100	16,100	18,100	20,100	21,700	23,300	24,900	26,500	28,100	29,800
7	17,300	19,700	22,200	24,700	26,700	28,600	30,600	32,600	34,600	36,700
8	20,500	23,400	26,300	29,200	31,600	33,900	36,300	38,600	41,000	43,500
9	23,700	27,100	30,500	33,800	36,600	39,200	41,900	44,700	47,400	50,300
10	26,900	30,700	34,600	38,400	41,500	44,600	47,600	50,700	53,800	57,100
11	30,285	34,605	38,925	43,245	46,710	50,175	53,640	57,105	60,531	64,163
12	33,650	38,450	43,250	48,050	51,900	55,750	59,600	63,450	67,257	71,292
13	40,380	46,140	51,900	57,660	62,280	66,900	71,520	76,140	80,708	85,551
14	47,110	53,830	60,550	67,270	72,660	78,050	83,440	88,830	94,160	99,809
15	53,840	61,520	69,200	76,880	83,040	89,200	95,360	101,520	107,611	114,068

**Rent (total tenant payment) Chart**

Income Tier	Bedrooms						
	0	1	2	3	4	5	6
1	\$ 120	120	125	130	140	160	180
2	125	135	150	170	210	235	270
3	165	185	205	225	270	305	345
4	240	275	305	340	400	450	510
5	330	380	420	475	535	605	685
6	410	475	525	590	670	760	860
7	500	565	630	710	815	920	1,040
8	580	660	735	840	945	1,065	1,200
9	660	765	865	960	1,105	1,245	1,405
10	820	880	1,125	1,175	1,260	1,425	1,605
11	840	960	1,190	1,260	1,445	1,575	1,785
12	970	1,115	1,250	1,495	1,630	1,825	2,070
13	1,150	1,315	1,475	1,825	1,995	2,195	2,310
14	1,325	1,510	1,705	1,895	2,165	2,490	2,625
15	1,500	1,715	1,930	2,140	2,490	2,830	2,865

**Escrow calculation:** Escrow will continue to be paid out only upon successful graduation from the program. In the event the participant is terminated from the program, the escrow will be forfeited, as it is now. The proposed escrow calculation has two parts: escrow based on earned income and goals achieved. The benefits include:

- Creating a more equitable system across all income levels, encouraging both low- and more moderate-income earners to participate and reap the rewards as they move towards self-sufficiency
- Providing escrow funds for participating households who otherwise would be ineligible for the escrow component due to level of earned income at the time they join the program
- Establishing goal-specific escrow deposits to be awarded when a family attains an established goal (i.e. completing educational goals, maintaining a certain level of employment, etc.)
- Providing a clear goal and greater transparency in terms of escrow possibilities
- Fixing a loophole in the program to discourage participants from quitting a job just prior to enrolling in the FSS program and starting another job shortly after enrolling in order to build escrow sooner
- Reducing staff time in calculating, auditing and posting escrow

The first part is to continue with a monthly deposit based on earned income in years 3, 4 and 5. At the time of recertification in years 3 and 5, the escrow will be based on the amount of gross annual earned income that is included in the rent calculation. The deposit will be made monthly to the escrow account. If there is a decrease in income that meets the eligibility criteria and a participant is eligible for an interim decrease, the escrow amount will be adjusted accordingly. If income increases, the participant will choose if they wish to include this income in the rent calculation, which will result in an increase in the portion of rent paid, and an increase in the monthly escrow deposit. Based on the rent calculation, these increases are not required to be reported, but will be left up to the discretion of the participant. If a participant is able to graduate early, the escrow based on earned income would be calculated and paid as if they had remained in the program through the end of the five-year term. The escrow based on annual earned income is as follows:

<b>Beginning in Year 3, households will receive escrow based on earned income included in the rent calculation:</b>	
<b>Income Range</b>	<b>Monthly escrow</b>
\$10,000 - 14,999	\$50
\$15,000 - 19,999	\$75
\$20,000 - 24,999	\$100
\$25,000 - 29,999	\$125
\$30,000 - 34,999	\$150
\$35,000 - 39,999	\$175
\$40,000 - 44,999	\$200
\$45,000 - 49,999	\$225
\$50,000 - 54,999	\$250
\$55,000 - 59,999	\$275
\$60,000 - 64,999	\$300
\$65,000 - 69,999	\$325
\$70,000 - 74,999	\$350
\$75,000 - 79,999	\$375
\$80,000 and above	\$400

The second part of the escrow calculation includes escrow deposits based on goals achieved. As families achieve certain benchmarks, they will receive a corresponding deposit to their escrow account. These are based on the following:

	<b>Goals achieved on or after 1/1/2020 (or after participation begins)</b>	<b>Escrow amount</b>
1	Complete FSS Year 1 Requirements (per household)	\$100
2	Complete FSS Year 2 Requirements (per household)	\$200
3	Complete FSS Year 3 Requirements (per household)	\$300
4	Complete FSS Year 4 Requirements (per household)	\$400
5	Complete FSS Year 5 Requirements (per household)	\$500
6	Complete Educational Goals listed below (by any adult household member):	
	GED	\$150
	Post-Secondary Certification	\$250
	Associate Degree	\$1,000
	Bachelor's Degree or higher	\$2,000
7	Maintain employment of (calculated once/year per adult household member):	
	at least 32 hours per week for 6 consecutive months	\$250
	at least 32 hours per week for 12 consecutive months	\$500
8	6-month Work Force paid internship (by any adult household member)	\$250
9	12-month Work Force paid internship (by any adult household member)	\$500
10	Receive health benefits from employer (calculated once at end of contract per household)	\$100
11	Graduation without voucher assistance (per household)	\$2,500
12	Purchase of home within 6 months of graduation (per household)	\$5,000

These changes to the rent and escrow calculations for families participating in the FSS program will:

1. Reduce cost and achieve greater cost effectiveness in federal expenditures; and
2. Create incentives for families to work, seek work or prepare for work.

Anticipated schedule: All new admissions after approval of this activity as of January 1, 2020 will have the rent and escrow calculated under this new methodology. Current participants may opt in at the time of their annual recertification for recertifications effective June 1, 2020 or later, after having the differences explained to them based on their family's specific circumstances.

## B. Activity Metrics Information

Unit of measurement	Baseline	Benchmark	Outcome
CE #1 - Total cost of task in dollars (decrease) biennial recerts and no interims	\$5,460 (210 x \$26 per hour)	\$3,276 (40% reduction)	To be provided in Annual Report
CE #2 - Total time to complete the task in staff hours (decrease)	210 (35 annuals x 3 hours per annual plus 70 interims x average of 1.5 hours per annual)	126 (40% reduction)	To be provided in Annual Report
CE #5 – Total household contributions towards housing assistance (increase)	\$590 per household	\$632 (Increase of 7%, includes hardship upon transition if applicable)	To be provided in Annual Report
CE #6 – Average amount of HAP per household affected by this policy (decrease)	\$625 per household)	\$583 (Decrease of 7%, includes hardship upon transition if applicable)	To be provided in Annual Report
SS #1 – Average earned income of households affected by this policy in dollars (increase)	\$22,033	\$22,474 (Increase of 2%)	To be provided in Annual Report
SS #2 – Average amount of escrow of households affected by this policy in dollars (increase)	Average escrow upon graduation \$6,137	\$11,137 (Increase of \$5,000 per household)	To be provided in Annual Report
SS #3 – Increase in positive employment status: Full time Part time Educational program Job training Unemployed Other	Full time: 21 Part time: 9 Educational Program: unknown Job Trainee: unknown Unemployed: 3	Full time: no increase Part time: no increase Educational Program: no change Job Trainee: no change Unemployed: no decrease	To be provided in Annual Report
SS #4 – Number of households receiving TANF (decrease)	1	None	To be provided in Annual Report
SS #5 – Number of households receiving services aimed to increased self-sufficiency	35	35	To be provided in Annual Report

SS #8 – Number of families moved to self-sufficiency. SS defined as exiting program and moving into market rental or homeownership	2.4 families graduated without voucher assistance	4	To be provided in Annual Report
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The data source for all metrics will be a combination of the Housing Management Software System (Yardi), agency budget tracking, FSS partner tracking, and reporting by participants.

### **C. Cost Implications**

Current participants in the program will not be transitioned to the current system, unless they choose to opt in. All new participants entering the program after January 1, 2020 will automatically have their rent and escrow calculated per this method. BHP anticipates that the flat tiered rent structure will decrease the cost of HAP and the new escrow structure will increase the cost to the program, resulting in a net zero cost to the program.

In 2014, when we implemented the flat tiered rent structure for all work-abled families, there was a 10% decrease in HAP costs in year one, due to the hardship provision. If we apply this same decrease to the current participants at Woodlands (assuming they all opted into the new calculation in 2020), this results in a decrease in HAP costs of approximately \$26,000. If all families opted in, the average escrow would increase from \$4,700 to \$10,000. FSS is a five-year program with an average of 7 households graduating per year. This would increase the cost of escrow payouts by \$26,500. The decrease in HAP is close to the increase in escrow.

Under the current method of rent and escrow calculations, the amount of escrow is a direct cost to the program. Under the proposed calculation, as participant rent increases, the amount of housing assistance decreases, which could then cover the cost of escrow.

If there is any cost to the program in future years, we believe the cost will be minimal and can be covered by current budget authority.

### **D. Need/Justification for MTW Flexibility**

From Standard MTW Agreement, Attachment C, Statement of Authorizations, Sections:

- D. 1. c: The Agency is authorized to define, adopt, and implement a reexamination program that differs from current program requirements.
- D. 2. a: The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differs from current program requirements.
- E. The agency is authorized to operate its existing self-sufficiency programs, including the FSS program exempt from certain HUD program requirements. These may include those requirements governing program size or participation, including whether to establish escrow accounts and other rent incentives.

MTW flexibility is needed to implement the flat tiered rent system, increase the minimum rent, conduct biennial recertifications, charge a flat fee per ineligible family member, eliminate interim recertifications except in certain cases and modify the manner in which escrow is calculated and earned.

## **E. Rent Reform/Term Limit Information**

### **i. IMPACT ANALYSIS**

Current participants will not be impacted by this rent reform activity, unless they choose to be. For future participants, we believe that impacts to household rent and income will be similar for the households under MTW Activity 2016-1: Flat Tiered Rent for Work-abled Households. For these households, rent portion increased as income increased by 26% on average and average rent burden was 32%.

This activity will be closely tracked and reported on annually. A hardship provision is in place for any current participants who wish to opt into the new rent and escrow calculation. Current participants will be given the option to switch only after receiving a side-by-side comparison based on the updated information provided at the time of annual recertification. Current participants have the option to stay on the current method of calculating rent and escrow until they graduate. All participants new to the program after January 1, 2020 will be under this proposed method.

This activity only affects the 35 households participating in the Family Self-Sufficiency Program living at Woodlands. If current participants do not elect to opt in, it will take five years for all 35 households to be under this rent and escrow system.

### **ii. HARDSHIP CASE CRITERIA**

**Maximum rent increase** – For new admissions to the program, there is no hardship, as the rent and escrow will be based on this new structure. For current participating households who opt into this rent and escrow structure, the maximum rent increase will be capped at 7% upon transition. At the next recertification, provided all other factors remain the same, including income, contract rent, utility allowance, unit size, etc., the family’s portion of rent will not increase more than 7%. This hardship will be determined based on the family’s circumstances at transition or recertification and automatically applied.

**No interim recertifications** – This hardship is included in Activity 2016-1 and will also apply to this Activity and will continue as long as this policy is in place. Families will be able to request an interim in writing and provide third-party documentation regarding the circumstances around the loss of income. Requests will be reviewed on a case-by-case basis. Exceptions will be made to this policy based on reasonable accommodation requests, as well as extenuating circumstances or situations. Examples of reasons for which an interim would be processed include loss of income that cannot be replaced (child support or SSI), disability-related reason, and loss of income through no fault of their own. Circumstances that will be considered when determining if an interim will be processed to reduce the rent portion include reason for the loss of income, if the income can be replaced, if the affected family member has a history of being employable, etc. Families who do not qualify for an interim decrease may be referred to our partner agency, Emergency Family Assistance Association, to be evaluated for assistance through the Safety Net Referral Program.

### **iii. DESCRIPTION OF ANNUAL REEVALUATION**

As with all MTW activities, the metrics are reviewed annually, along with other impacts, which then determines if any changes are needed to the activity. There will be a hardship provision automatically implemented for any current participants who opt into the flat tiered rent structure. New participants entering the program will be under the flat tiered rent and new escrow structure. Based on experience with the flat tiered rent structure in place for all non-FSS households, we do not anticipate any negative impacts or unintended consequences.

#### **iv. TRANSITION PERIOD**

This activity will apply to all new admissions to the program as of January 1, 2020. All current participating households will have the discretion to opt into the flat tiered rent structure and new escrow methodology at the time of their annual recertification for recertifications effective June 1, 2020 or later. In order for the households to make the best decision for their family, the impact of transitioning to this rent and escrow structure will be explained to them in detail with a comparison made between the traditional methodology and the new structure. Once a family opts into this rent and escrow structure, they will remain under this structure until they graduate.

## **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 Voucher program. This activity was approved and implemented in 2012.

BHP does not anticipate any changes to the activity or its metrics in 2020.

### ***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 2020.

### ***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 2020.

### ***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 2020.

### ***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 Utility Reimbursement Payments 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 2020.

### ***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 2020.

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

This activity allows BHP to use Replacement Housing Factor Funds to build other affordable housing units. In 2014, BHP used these 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 2020.

### ***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. Madison was approved for disposition in 2019, with conversion planned for September 2020. With the reduction in the number of public housing units, changes to the activity or metrics are anticipated in 2020 and will be reflected in the 2020 Annual Report.

### ***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 2020.

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

BHP's Strategic Plan calls for adding 2,000 affordable units by 2024. This activity will allow us to reach that goal by using MTW funds to support affordable housing acquisition and development. In 2016, we supplemented the purchase of one building (6 units) of affordable housing and 4.597 acres of land to be used for future development. In 2017, we purchased 4 units of affordable housing. In 2018, BHP used MTW funds to purchase an additional 10 units, for a total of 20 units and land. This activity was approved and implemented in 2015.

BHP does not anticipate any changes to the activity or its metrics in 2020.

### ***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 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.

Beginning in 2020, BHP will no longer recertify all work-abled households effective the same day. Recertifications will re-align with their lease renewal date for each group. Each group will continue to recertify every two years (tenant based in even years and project based in odd years) and metrics will be reflected accordingly.

BHP does not anticipate any changes to the metrics in 2020.

### ***Activity 2016-2: Rent reform for 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 2020.

### ***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 2020.

### ***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 2020.

### ***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 2020.

### ***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 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. This activity was never implemented and 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.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	223,243
70600	HUD PHA Operating Grants	8,614,817
70610	Capital Grants	375,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0
71100+72000	Interest Income	526
71600	Gain or Loss on Sale of Capital Assets	5,900,000
71200+71300+71310+71400+71500	Other Income	14,254
70000	Total Revenue	15,127,840

### 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.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	547,443
91300+91310+92000	Management Fee Expense	223,464
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	22,142
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	47,413
93500+93700	Labor	0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	48,530
95000 (95100+95200+95300+95500)	Total Protective Services	6,492
96100 (96110+96120+96130+96140)	Total Insurance Premiums	30,111
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	23,876
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	0
97100+97200	Total Extraordinary Maintenance	0
97300+97350	HAP + HAP Portability-In	8,176,587
97400	Depreciation Expense	48,121
97500+97600+97700+97800	All Other Expense	0
90000	Total Expenses	9,174,180

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

Revenue includes October disposition of the Madison public housing property, gain on sale is estimated to be \$5,900,000 plus reduced costs due to disposition is estimated to be \$24,000.

**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).

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

**B. LOCAL ASSET MANGEMENT PLAN**

- i. Is the MTW PHA allocating costs within statute?
- ii. Is the MTW PHA implementing a local asset management plan (LAMP)?
- iii. Has the MTW PHA provide a LAMP in the appendix?
- 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.

**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.

<b>RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION</b>
<b>BHP converted 283 units of Public Housing under RAD effective 10/1/2015.</b>

- 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.
- 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?

## **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 (01/01/2020), 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.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (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, Subpart F.

- (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  
 MTW PHA NAME

CO016  
 MTW PHA NUMBER/HA CODE

*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).*

Valerie Soraci  
 NAME OF AUTHORIZED OFFICIAL

Board of Commissioners Chair  
 TITLE

Valerie Soraci  
 SIGNATURE

10/16/19  
 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 2020 MTW Annual Plan was made public for review from September 9, 2019 through October 15, 2019. The Plan was posted to our website. One public hearing was held on September 18, 2018. There were no public housing residents or Housing Choice participants who attended, and no public comments were received. Feedback for Activity 2020-1: FSS Rent and Escrow Calculations was received during two focus groups (June 4 and August 13, 2019) with current FSS participants and one informational meeting held on September 4, 2019 for all current FSS participants. Feedback was also provided by Boulder County Housing Authority's FSS Case Managers.

## Agency-Directed Evaluation of the Demonstration

BHP was 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 started 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 followed these families until 2019, and measured progress towards self-sufficiency in ten domains. The details of the study can be found in BHP's 2014 MTW Annual Plan. The results for each year between 2015 and 2019 can be found in the corresponding 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. Bringing School Home 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. Affordable Housing Institute 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 to understand what's working in using housing as a platform to close the achievement gap. In partnership with Boulder County and other community partners, we are exploring the impact of service-enriched housing that seeks to positively impact children's educational outcomes, parents' economic stability, and the whole families' over-all wellbeing.

- 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 are the key supports that parents need to increase their housing and economic stability?
- What will it take to bring the existing two successful models to scale?

### ***Lobby Disclosures***

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

## DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB  
0348-0046

(See reverse for public burden disclosure.)

<b>1. Type of Federal Action:</b> <input checked="" type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. Status of Federal Action:</b> <input checked="" type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. Report Type:</b> <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Boulder Housing Partners 4800 Broadway Boulder, CO 80304  <b>Congressional District, if known:</b> 4c CO-002	<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>   <b>Congressional District, if known:</b>	
<b>6. Federal Department/Agency:</b>  Department of Housing and Urban Development	<b>7. Federal Program Name/Description:</b>  Moving to Work Demonstration Program  CFDA Number, if applicable: _____	
<b>8. Federal Action Number, if known:</b>	<b>9. Award Amount, if known:</b>  \$	
<b>10. a. Name and Address of Lobbying Registrant</b> (if individual, last name, first name, MI):  N/A	<b>b. Individuals Performing Services</b> (including address if different from No. 10a) (last name, first name, MI):  N/A	
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature:  Print Name: <u>Jeremy Durham</u> Title: <u>Executive Director</u> Telephone No.: <u>720-564-4610</u> Date: <u>9/5/2019</u>	
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

# Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 03/31/2020)

Applicant Name

Boulder Housing Partners (Housing Authority of the City of Boulder)

Program/Activity Receiving Federal Grant Funding

Moving to Work Demonstration/Housing Choice Voucher/Public Housing Programs

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an 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 an 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, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this 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 sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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)

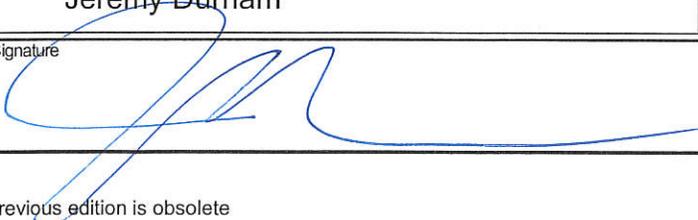
Name of Authorized Official

Jeremy Durham

Title

Executive Director

Signature



Date (mm/dd/yyyy)

9/5/2019