

SUBMITTED MARCH 30, 2022

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# I. INTRODUCTION

## OVERVIEW OF MTW GOALS AND OBJECTIVES

This 2021 Annual Report highlights the activities of Boulder Housing Partners (BHP) in our tenth year as a participant in the Moving to Work (MTW) demonstration program. We continued monitoring our current activities and fully implemented the approved 2020 activity.

The extraordinary events of the past two years highlighted the need for creative and quick responses to the families that we serve, the reminder that we are all in this together and that it truly does take a village to do the hard work we do. The pandemic also taught us to think outside the box and become more adept at using technology where possible. BHP is currently producing videos for training and briefings, creating electronic signature forms, and working to implement a participant and applicant portal.

2021 was also a historic year for BHP, and the housing world, with the birth of the Emergency Housing Voucher program through the American Rescue Plan Act. These vouchers come with funding to providing housing search assistance, security and utility deposits, application fees, owner incentives, tenant-readiness services, essential household goods, etc. BHP was awarded 35 vouchers to house those that are:

- Homeless
- At risk of homelessness
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking
- Recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability

Also, in 2021, BHP was awarded an additional 40 Mainstream Vouchers (which serve households with a member who has a disability) under the Coronavirus Aid, Relief, and Economic Security Act through the non-competitive award provision. This brought our total of Mainstream Vouchers to 178.

Since our inception in the MTW Program, BHP has:

- implemented rent reform with triennial recertifications for households who are elderly and/or persons with a disability
- implemented a flat tiered rent structure and biennial recertifications for our work-able families

- eliminated the need for all Housing Choice families to report income increases prior to their next regularly scheduled recertification
- eliminated the 40% cap of income towards rent for Housing Choice voucher holders
- simplified the utility allowance schedule for Housing Choice voucher households and eliminated utility reimbursement payments
- tied the Housing Quality Standards (HQS) inspection to the recertification cycle
- offered housing and services to victims of domestic violence with our partner Safehouse Progressive Alliance for Non–Violence (SPAN)
- used Replacement Housing Factor Funds to create 1175 Lee Hill, a 31–unit community to house the chronically homeless
- created a Development and Acquisition Fund which allowed us to purchase 27 units of affordable housing and 5.25 acres of land
- converted 312 units of public housing through Section 18 Disposition and the Rental Assistance Demonstration Program, while creating 3 new community centers and renovating all units to like-new conditions
- created the Bringing School Home Program, which focuses on families with children under 6 and offers services so children are school-ready by kindergarten
- implemented a new escrow model for families in the Family Self Sufficiency program to allow for escrow based on goals achieved along with escrow based on earned income

#### OVERVIEW OF BHP’S LONG–TERM VISION FOR THE MTW PROGRAM

As described in full detail in the 2021 MTW Annual Plan, Boulder Housing Partners will be focusing on these main areas in the coming years: Transforming Bureaucracy; Increasing Housing Choice; Bringing School Home; and Completing the Conversion of Public Housing.

#### Transforming Bureaucracy: People, Not Paper

We continue to focus on ways to streamline all aspects of the housing program, to have more time to focus on people.

#### Increase Housing Choice

In 2021, we added 120 units (in a tax credit property) and 75 vouchers (35 Emergency Housing Vouchers and 40 Mainstream Vouchers).

#### Bringing School Home: Disrupting the Cycle of Poverty

We continue to focus on the idea that poverty continues to be a bar to learning and quality affordable housing can change that. By expanding services to include children at a younger age (0 to 5), we believe we can break the cycle of poverty in two generations.

#### Complete the Conversion of Public Housing

BHP continues to own 14 units of Public Housing. We will apply for a Section 18 disposition action when the City of Boulder finalizes their plans to redevelop the downtown area where Arapahoe Court is located. This will bring us one step closer to having one HUD-funded program.

## II. GENERAL HOUSING AUTHORITY OPERATING INFORMATION

### A. HOUSING STOCK INFORMATION

#### i. Actual New Project Based Vouchers

Tenant-based vouchers that the MTW PHA project-based 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) was 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 NEWLY PROJECT-BASED		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
30Pearl	20	20	Leased	No	20 units (out of 120) project-based to serve households with a member who has an intellectual and/or developmental disability (mix of MTW and Mainstream vouchers)

20	20
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Planned/Actual Total Vouchers Newly Project-Based

\* Figures in the "Planned" column should match the corresponding Annual MTW Plan.

\*\* Select "Status at the End of Plan Year" from: Committed, Leased/Issued

Please describe differences between the Planned and Actual Number of Vouchers Newly Project-Based:

N/A

#### ii. Actual 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 was in place by the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
1175 Lee Hill	31	31	Leased/Issued	No	Permanently supportive housing for the chronically homeless
30Pearl	20	20	Leased/Issued	No	Supportive housing for developmentally disabled (mix of MTW and Mainstream vouchers)
Broadway East	44	44	Leased/Issued	No	Public housing units converted in 2006
Diagonal Court	30	30	Leased/Issued	Yes	Public housing units converted in 2015
Holiday McKinney	10	10	Leased/Issued	No	Permanently supportive housing for the chronically homeless
Iris Hawthorn	14	14	Leased/Issued	Yes	Public housing units converted in 2015
Kalmia	49	49	Leased/Issued	No	Public housing units converted in 2015
Manhattan	41	41	Leased/Issued	Yes	Public housing units converted in 2015
Madison	33	33	Leased/Issued	Yes	Public housing units converted in 2020
Northport	50	50	Leased/Issued	Yes	Public housing units converted in 2015
Walnut Place	95	95	Leased/Issued	No	Public housing units converted in 2015
Woodlands	35	35	Leased/Issued	No	Family Self Sufficiency Program with a partner agency

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452

**Panned/Actual Total Existing Project-Based Vouchers**

\* Figures and text in the “Planned” column should match the corresponding Annual MTW Plan.

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

**Please describe differences between the Planned and Actual Existing Number of Vouchers Project-Based:**

N/A

**iii. Actual Other Changes to MTW Housing Stock in 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.

ACTUAL OTHER CHANGES TO MTW HOUSING STOCK IN THE PLAN YEAR
No other changes in 2021.

**iv. General Description of All Actual Capital Expenditures During the Plan Year**

Narrative general description of all actual capital expenditures of MTW funds during the Plan Year.

GENERAL DESCRIPTION OF ALL ACTUAL CAPITAL EXPENDITURES DURING THE PLAN YEAR
BHP spent a total of \$73,433 in 2021: CFP Capital funds; \$17,557 for Wifi installation project for Public Housing at Arapahoe Court; and CFP Operating funds; \$55,876 to support normal operations of MTW and Public Housing activities.

**B. LEASING INFORMATION**

**i. Actual Number of Households Served**

Snapshot and unit month information on the number of households the MTW PHA actually served at the end of the Plan Year.

NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS SERVED**	
	Planned^^	Actual	Planned^^	Actual
MTW Public Housing Units Leased	160	166	13	14
MTW Housing Choice Vouchers (HCV) Utilized	10,826	10,990	902	916
Local, Non-Traditional: Tenant-Based	0	0	0	0
Local, Non-Traditional: Property-Based	312	308	26	26
Local, Non-Traditional: Homeownership	0	0	0	0
	11,298	11,464	941	956

Planned/Actual Totals

\* “Planned Number of Unit Months Occupied/Leased” is the total number of months the MTW PHA planned to have leased/occupied in each category throughout the full Plan Year (as shown in the Annual MTW Plan).

\*\* “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 (as shown in the Annual MTW Plan).

^^ Figures and text in the “Planned” column should match the corresponding Annual MTW Plan.

Please describe any differences between the planned and actual households served:

Housing Choice Voucher occupancy rates were stable, more so than anticipated in 2021.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS TO BE SERVED*	
		Planned^^	Actual	Planned^^	Actual
Tenant-Based	N/A	0	0	0	0
Property-Based	2015-1 Affordable housing acquisition and development fund	312	308	26	26
Homeownership	N/A	0	0	0	0
<b>Planned/Actual Totals</b>		312	308	26	26

\* 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.

^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

HOUSEHOLDS RECEIVING LOCAL, NON-TRADITIONAL SERVICES ONLY	AVERAGE NUMBER OF HOUSEHOLDS PER MONTH	TOTAL NUMBER OF HOUSEHOLDS IN THE PLAN YEAR
N/A	N/A	N/A

ii. Discussion of Any Actual Issues/Solutions Related to Leasing

Discussion of any actual issues and solutions utilized in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS
MTW Public Housing	There was less turnover in the public housing units than anticipated.
MTW Housing Choice Voucher	Utilization rate was higher than anticipated, with an annualized occupancy rate of 97%.
Local, Non-Traditional	More households were served this year than planned as units turned over.

**C. WAITING LIST INFORMATION**

**i. Actual Waiting List Information**

Snapshot information on the actual status of MTW waiting lists at the end 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	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
Arapahoe Court	PH site-based list	46	Closed	No
Madison (3 bedroom only)	PH site-based list	212	Closed	No
HCV Lottery	Lottery for HCV	0	Closed	Yes

Please describe any duplication of applicants across waiting lists:

There are no duplications between the waiting lists. The Madison property was disposed out of Public Housing in 2020. The wait lists for the one- and two-bedroom units have been exhausted. The three-bedroom wait list is still active.

**ii. Actual Changes to Waiting List in the Plan Year**

Please describe any actual 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 ACTUAL CHANGES TO WAITING LIST
Arapahoe Court/Madison	These lists were not open in 2020. The Madison public housing wait list will be exhausted and no longer used due to conversion to the Low-Income Housing Tax Credit Program.
HCV Lottery	The lottery was open in February and June 2021.

**D. INFORMATION ON STATUTORY OBJECTIVES AND REQUIREMENTS**

**i. 75% of Families Assisted Are Very Low Income**

HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW PHA are very low income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA should provide data for the actual families housed upon admission during the PHA’s Plan Year reported in the “Local, Non-Traditional: Tenant-Based”; “Local, Non-Traditional: Property-Based”; and “Local, Non-Traditional: Homeownership” categories. Do not include households reported in the “Local, Non-Traditional Services Only” category.



INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80%-50% Area Median Income	2
49%-30% Area Median Income	4
Below 30% Area Median Income	1

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**Total Local, Non-Traditional Households Admitted**

**ii. Maintain Comparable Mix**

HUD will verify compliance with the statutory requirement that MTW PHAs continue to serve a comparable mix of families by family size by first assessing a baseline mix of family sizes served by the MTW PHA prior to entry into the MTW demonstration (or the closest date with available data) and compare that to the current mix of family sizes served during the Plan Year.

BASELINE MIX OF FAMILY SIZES SERVED (upon entry to MTW)					
FAMILY SIZE	OCCUPIED PUBLIC HOUSING UNITS	UTILIZED HCVs	NON-MTW ADJUSTMENTS*	BASELINE MIX NUMBER	BASELINE MIX PERCENTAGE
1 Person	188	268	0	456	49.03%
2 Person	17	145	0	162	17.42%
3 Person	23	61	0	84	9.03%
4 Person	46	66	0	112	12.04%
5 Person	46	42	0	88	9.46%
6+ Person	10	18	0	28	3.01%
<b>TOTAL</b>	<b>330</b>	<b>600</b>	<b>0</b>	<b>930</b>	<b>100.00%</b>

\* "Non-MTW Adjustments" are defined as factors that are outside the control of the MTW PHA. An example of an acceptable "Non-MTW Adjustment" would include demographic changes in the community's overall population. If the MTW PHA includes "Non-MTW Adjustments," a thorough justification, including information substantiating the numbers given, should be included below.

**Please describe the justification for any "Non-MTW Adjustments" given above:**

No adjustments have been made to the baseline. In 2015, BHP converted 283 units of public housing to housing choice vouchers. In 2020, BHP disposed of 34 units of Public Housing, which were replaced with 33 Tenant Protection Vouchers. These households are now included under the HCV program.

MIX OF FAMILY SIZES SERVED (in Plan Year)				
FAMILY SIZE	BASELINE MIX PERCENTAGE**	NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR^	PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR^^	PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR
1 Person	49%	509	55%	5.64%
2 Person	17%	183	20%	2.24%
3 Person	9%	97	10%	1.39%
4 Person	12%	70	8%	-4.52%
5 Person	9%	33	4%	-5.92%
6+ Person	3%	39	4%	1.18%
TOTAL	100%	931	100%	0%

\*\* The “Baseline Mix Percentage” figures given in the “Mix of Family Sizes Served (in Plan Year)” table should match those in the column of the same name in the “Baseline Mix of Family Sizes Served (upon entry to MTW)” table.

^ The “Total” in the “Number of Households Served in Plan Year” column should match the “Actual Total” box in the “Actual Number of Households Served in the Plan Year” table in Section II.B.i. of this Annual MTW Report.

^^ The percentages in this column should be calculated by dividing the number in the prior column for each family size by the “Total” number of households served in the Plan Year. These percentages will reflect adjustment to the mix of families served that are due to the decisions of the MTW PHA. Justification of percentages in the current Plan Year that vary by more than 5% from the Baseline Year must be provided below.

**Please describe the justification for any variances of more than 5% between the Plan Year and Baseline Year:**

BHP has made no decisions to directly affect the changes to the mix of families served. New households are admitted to the Housing Choice Voucher program based on a lottery system.

**iii. Number of Households Transitioned to Self-Sufficiency in the Plan Year**

Number of households, across MTW activities, that were transitioned to the MTW PHA’s local definition of self-sufficiency during the Plan Year.

MTW ACTIVITY NAME/NUMBER	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY*	MTW PHA LOCAL DEFINITION OF SELF SUFFICIENCY
2013-3 Partnership with SPAN	2	Moving to market rate or homeownership
2016-1 Flat tier rent for work able families	4	Moving to market rate or homeownership

2016-2 Rent reform for elderly and persons with disabilities households	0	Moving to market rate or homeownership
2016-4 Bringing School Home Referral Process	0	Moving to market rate or homeownership
	0	<i>(Households Duplicated Across MTW Activities)</i>
<b>Total Households Transitioned to Self Sufficiency</b>	<b>6</b>	

\* Figures should match the outcome reported where metric SS#8 is used in Section IV of this Annual MTW Report.

### III. PROPOSED MTW ACTIVITIES

All proposed activities that have been granted approval by HUD are reported on in Section IV as 'Approved Activities'.

### IV. APPROVED MTW ACTIVITIES

#### IMPLEMENTED ACTIVITIES

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##### ACTIVITY 2012–4

##### a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

Activity 2012–4, Rent Simplifications for all Households, was approved and implemented in 2012. The activity has not been amended.

##### b. DESCRIPTION/IMPACT/UPDATE

The goal of this activity was to implement a series of changes to simplify the income and asset verification process for all families. This activity:

- allows households to provide asset and income documentation;
- excludes income from assets and allows for self-certification of assets that total \$50,000 or less; and
- limits total household assets to \$50,000 or less upon admission to the public housing and Housing Choice programs.

This was not a rent reform activity and no hardship policy required. However, an exception policy was created in relation to the asset limit upon admission. If households qualify for the exception based on five criteria, they are allowed admission to the program. The five criteria include: household is classified as elderly or a person with a disability; they do not own any real estate; the assets only include money in a bank account (savings, money market, etc.); they plan to use the asset for assisted living in the future; and they are currently living on no income or a fixed income. In 2021, two households were denied admission for having total assets valuing more than \$50,000. One qualified for the exception, and the other did not. There were 158 new admissions to the programs (three to the public housing program and 155 to the Housing Choice Voucher Program).

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
CE #1 – Total cost of task in dollars (decrease) asset income calculation	\$1,677 (64.5 hours x \$26 average per hour)	\$671 (Reduction of 60%)	\$324 (12 hours)	Yes
CE #2 – Total time to complete the task in staff hours (decrease) asset income calculation	64.5 staff hours (86 households x 45 minutes on average)	25.8 hours (Reduction of 60%)	12 hours (16 households)	Yes
CE #3 – Average error rate in completing a task as a percentage (decrease)	5% Potential for error	3% reduction in potential for error	2% (Reduction of 81%)	Yes

**c. ACTUAL NON-SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**d. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

There have been no changes to the metrics or data collection methodology.

**e. ACTUAL SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

There have not been any challenges in achieving the benchmarks that were laid out.

**ACTIVITY 2012–5**

**a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Activity 2012–5, Elimination of the 40% of Income Cap in the voucher program, was approved and implemented in 2012. This activity has not been amended.

**b. DESCRIPTION/IMPACT/UPDATE**

The goal of this activity is to increase rental choices to Housing Choice voucher holders by eliminating the 40% of income towards rent cap when they initially lease up. In 2021, 12 families rented a unit where their portion of the rent was more than 40%. The average rent burden for these families is 63%, with a range of 42% to 133%.

Since implementation of this activity in 2012, we have had a total of 115 households lease up with a rent burden being more than 40%. When households choose to do this, they sign an agreement confirming their understanding that loss of housing assistance will occur if they are evicted for non-payment of rent. Not one household has lost their assistance since this choice has been offered.

This was not a rent reform activity and no hardship created.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
HC #5 – Number of households able to move to a better unit as a result of the activity (increase)	Zero	2% or 17 households per year	15 households	No

**c. ACTUAL NON-SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**d. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

There have been no changes to the metrics or data collection methodology.

**e. ACTUAL SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

In 2021, the benchmark was not achieved. The number of voucher holders who choose this option is dependent on whether voucher holders move to another unit, where they choose to lease up, how much they are willing to pay, how the rents compare to the current payment standards, etc. We do not always achieve the benchmark, but it does allow participants greater freedom of choice and location within Boulder County.

**ACTIVITY 2012–6**

**a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Activity 2012–6, Implement a Flat Utility Allowance for the voucher program, was approved and implemented in 2012. No amendments have been made to this activity.

**b. DESCRIPTION/IMPACT/UPDATE**

This activity was designed to increase voucher holders’ understanding of the rent calculation, specifically how utilities affect the maximum contract rent allowed. Implementation of this activity continues to allow for less time spent during the initial briefing to explain the utility allowance. This activity did not involve rent reform and no hardship was created.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
CE #1 – Total cost of task in dollars (decrease) explanation of utility allowance in briefings	\$20/briefing (45 minutes x \$26 hour)	\$15 (25% reduction)	\$10/briefing (22 minutes x \$26 hour)	Yes
CE #2 – Total time to complete the task in staff hours (decrease)	Average of 45 minutes per briefing	34 minutes (25% reduction)	Average of 22 minutes per briefing	Yes
CE #3 – Average error rate in completing a task as a percentage (decrease)	5% potential for error	0% reduce to zero	0%	Yes
CE #5 – Tenant Rent Share in dollars (increase)	Average utility allowance in 2011 was \$70	Reduction of \$6 for the average utility allowance	Average utility allowance was \$63, reduction of \$7 or 10%	This outcome was achieved in 2012

**c. ACTUAL NON-SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**d. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

There have been no changes to the metrics or data collection methodology.

**e. ACTUAL SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The benchmarks have been achieved and will continue to allow less time spent explaining the utility allowance.

ACTIVITY 2013–1

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

Activity 2013–1, Housing Quality Standards Inspection (HQS) Schedule, was written to replace Activity 2012–7 and was approved and implemented in 2013. No other amendments have been made to this activity.

b. DESCRIPTION/IMPACT/UPDATE

This activity aligns the HQS inspection with the recertification schedule. Beginning in 2013, for all households who are elderly or a person with disabilities, the inspection schedule follows the recertification schedule which is every three years. Beginning in 2014, when Activity 2014–1 was implemented, inspections for the work-able families were aligned with the biennial recertification schedule. This was not a rent reform activity; no hardship was created.

The metrics for this activity in 2020 and 2021 are skewed due to the waivers provided by HUD under the CARES Act in response to the COVID pandemic. BHP chose not to conduct annual inspections beginning in March through the end of 2020. A total of 118 inspections were still needing to be done as of December 31, 2021, for 2020 and 2021. During 2021, 133 total annual inspections were conducted (which were a combination of past years’ and current annual inspections).

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
CE #1 – Total cost of task in dollars (decrease) inspections following the recertification schedule	2012: \$26,425 (755 inspections x \$35 per inspection)	\$8,720 (Reduction of 66%)	\$4,655 (133 inspections) 82% reduction *see note above	Yes
CE #2 – Total time to complete the task in staff hours (decrease)	Inspections are conducted by an outside contractor	N/A	N/A	N/A – savings relate to cost of outside contractor, not staff



CE #3 – Average error rate in completing a task as a percentage (decrease)	Activity not designed to reduce errors	N/A	N/A	N/A – savings relate to cost of outside contractor, not staff
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**c. ACTUAL NON-SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**d. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

There have been no changes to the metrics or data collection methodology.

**e. ACTUAL SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

The benchmark was achieved this year, as not all annual inspections were conducted due to COVID. We also started 2021 with inspections that were due from 2020. This number fluctuates from year to year based on the number of work-abled families on the program and the different recertification cycles for each type of household.

**ACTIVITY 2013–2**

**a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Activity 2013–2, Eliminate Utility Reimbursement Payments, was approved and implemented in 2013. No amendments have been made to this activity.

**b. DESCRIPTION/IMPACT/UPDATE**

The activity ensures 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 payments to live on housing assistance). Households who were receiving a utility reimbursement payment (URP) in April 2013 continued to receive one through March 2014, unless there was a change in their circumstances that resulted in no URP. No new instances of URP were allowed after April 1, 2013. Households met with their Voucher Specialist within the first three months of implementation. Reminders with information on utility use and grants were sent in October 2013 and January 2014. There were 12 households who were still receiving URP as of March 31, 2014, and it was eliminated as of as of April 1, 2014, when the hardship ended.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
CE #1 – Total cost of task in dollars (decrease) elimination of utility reimbursement payments	\$12,396 (cost of 42 URP as of 4/1/2013)  \$247 (cost to mail 42 URPs each month)	Zero	Zero	Yes, achieved in 2014
CE #2 – Total time to complete the task in staff hours (decrease)	84 staff hours (42 checks x 10 minutes per check to print, stuff and mail)	Zero	Zero as of 4/1/14	Yes, achieved in 2014
CE #3 – Average error rate in completing a task as a percentage (decrease)	This activity was not designed to eliminate errors	N/A	N/A	N/A
CE #5 – Tenant Rent Share in dollars (increase)	Participants receiving a utility reimbursement had a tenant rent share of zero	No change anticipated	Tenant rent share remains at zero; however, they no longer receive the utility reimbursement payment to pay for their utilities	Yes, achieved in 2014

**c. ACTUAL NON-SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**d. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

There have been no changes to the metrics or data collection methodology.

**e. ACTUAL SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The benchmarks for this activity were achieved in 2014 when elimination of all utility reimbursement payments occurred.

ACTIVITY 2013–3

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

Activity 2013–2, Local Voucher Program in Partnership with Safehouse Progressive Alliance for Nonviolence (SPAN), was approved and implemented in 2013. No amendments have been made to this activity.

b. DESCRIPTION/IMPACT/UPDATE

This activity focuses on continuing BHP’s partnership with SPAN, providing eight families who are victims of domestic violence with housing assistance and case management services through SPAN. This activity allows BHP to use vouchers for transitional housing.

On January 1, 2021, we had eight families participating in this program. One family graduated and moved on with a voucher. Another family graduated from the program when their income increased to a point where the household no longer qualified for housing assistance. We had one family enter the program during 2021. As of 12/31/2021, there were seven families participating in the program. Four were eligible to graduate in 2021 and 2 more will be eligible in 2022. At the end of the year, we were working on three applicants for this program.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
CE #4 – Amount of funds leveraged in dollars (increase)	Zero, prior to this activity, no households were receiving services	\$16,000 (\$2,000 per household x 8 households)	\$16,000	Yes
SS #5 – Number of households receiving services aimed to increase self-sufficiency (increase)	Zero	8	8	Yes

SS #8 – Number of households transitioned to self-sufficiency (increase). Self-sufficiency defined as exiting program and moving into market rental or home ownership	Zero	4	2	No
HC #3 – Average applicant time on wait list in months (decrease)	12 months	6 months (Reduce by 50% based on this being a two-year transitional program)	2 months	Yes
HC #5 – Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	Zero	8	8	Yes, these families are victims of domestic violence, therefore all have moved to better situations and units

**c. ACTUAL NON-SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**d. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

There have been no changes to the metric or data collection methodology.

**e. ACTUAL SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

Due to the pandemic, we did not graduate as many families as anticipated.

**ACTIVITY 2013–4**

**a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Activity 2013–4, Use of Replacement Housing Factor Funds for Other Housing, was approved and implemented in 2013. No amendments have been made to this activity.

**b. DESCRIPTION/IMPACT/UPDATE**

This activity allows BHP to use Replacement Housing Factor (RHF) Funds to build other affordable housing units. In 2013, BHP used RHF Funds at 1175 Lee Hill, a 31–unit community for chronically homeless using the Housing First model. Construction began in 2013, with full completion and full occupancy in November 2014. BHP did not use any RHF Funds in 2021.

This was not a rent reform activity and no hardship was created.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
CE #4 – Amount of funds leveraged in dollars (increase)	Zero	Zero	Zero	Yes
HC #1 – Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase)	Zero	Zero	Zero	Yes
HC #2 – Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase)	Zero	Zero	Zero	Yes
HC #5 – Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	Zero	Zero	Zero	Yes

**c. ACTUAL NON-SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**d. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

There have been no changes to the metric or data collection methodology.

**e. ACTUAL SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

Due to the timing of receipt of the funds and the nature of this being a market-driven opportunity, units will be added as the opportunity arises.

**ACTIVITY 2014-4**

**a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Activity 2014-4 Removed the Flat Rent Option for all Public Housing Households. This activity was approved and implemented in 2014. No amendments have been made to this activity. With the disposition of the majority of our Public Housing Units, this activity is closed out as of December 31, 2021.

**b. DESCRIPTION/IMPACT/UPDATE**

In 2014 the option for families to choose to pay the flat rent when the rent portion based on income is higher than the flat rent was removed. When implemented, families were given six-months' notice of the rent amount they would pay under this activity. No further hardships have been granted. In 2021, there were no families whose income caused their rent to be more than the flat rent.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
CE #5 – PHA rental revenue in dollars (increase)	\$5,544	0	0	Yes

c. ACTUAL NON-SIGNIFICANT CHANGES

There have been no changes made to the activity since it was approved and implemented.

d. ACTUAL CHANGES TO METRICS/DATA COLLECTION

In November 2020, 34 additional units of public housing were removed through Section 18 disposition. This leaves 15 total units of public housing. These are one-bedroom units that serve households who are elderly or a person with a disability. It is rare that we have a family of this type whose income puts their rent above the flat rent amount.

e. ACTUAL SIGNIFICANT CHANGES

There have been no changes made to the activity since it was approved and implemented.

f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

In November 2020, 34 units of public housing were disposed, leaving 15 one-bedroom units of public housing. The benchmarks were adjusted in 2021 to reflect a full year of the remaining 15 units. Based on the population that generally occupies the one-bedroom units, this activity is being closed out as of December 31, 2021.

ACTIVITY 2014–5

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

Activity 2014-5 Changes the Mobility Options for Families who live at Woodlands, a project-based voucher community, and participate in the Family Self-Sufficiency (FSS) Program. This activity was approved and implemented in 2014. With the changes described below, this activity was closed out at the end of 2021.

In December 2021, our Administrative Plan for the Housing Choice Voucher Program was updated and the HUD rules regarding the Family Self Sufficiency Program were re-instated, effectively cancelling out this activity. In discussions with the FSS program staff (from our partner agency at Boulder County Housing and Human Services who administers this program for BHP), our Property Management team and the Housing Choice Voucher team, we decided to close this activity. Beginning January 1, 2022, the FSS participants at the Woodlands site will be able to stay at the property and retain their project-based voucher even if they are no longer participating in the FSS program. The opportunity to participate in the FSS program will be offered to all HCV participants in 2022.

**b. DESCRIPTION/IMPACT/UPDATE**

To request the next available voucher and move out of Woodlands, families must stay a minimum of three years (except in extenuating circumstances). Upon successful graduation from FSS, they must leave Woodlands, and may go with a voucher if the family continues to need housing assistance. In 2021, we had ten households move out of Woodlands, five were successful graduations (four left with voucher assistance, one left without voucher assistance). Of the remaining five move outs, three left without graduating, and two households were terminated from the program. Of the three successful graduations, all of them earned escrow with a total escrow payout of \$42,124.83. Households may request an exemption from the three-year rule for extenuating circumstances. In 2021, there were no requests.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
CE #1 – Total cost of task in dollars (decrease) applicant processing	\$780 (30 hours x \$26 per hour average)	\$390 (15 hours x \$26 per hour average)	\$1,170 (45 hours x \$26 per hours on average)	No
CE #2 – Total time to complete the task in staff hours (decrease)	30 total hours (5 hours on average x 6 families)	15 total hours (5 hours on average x 3 successful graduations)	45 total hours (5 hours on average x 9 move ins)	No
HC #3 – Average time on FSS wait list in months (decrease)	10.3 months	Decrease of one month	Increase of 1.4 months (11.7 months)	No

**c. ACTUAL NON-SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**d. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

There have been no changes to the metrics or data collection methodology.

**e. ACTUAL SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.



f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The benchmarks are dependent on the number of move ins that occur each year. In 2021, we had more than anticipated.

ACTIVITY 2015–1

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

Activity 2015-1 allows BHP to create an Affordable Housing Acquisition and Development Fund. This activity was approved and implemented in 2015. No amendments have been made to this activity.

b. DESCRIPTION/IMPACT/UPDATE

BHP uses MTW funds to pursue opportunities in the city of Boulder to build new rental units as well as acquire existing land and/or units to increase the number of affordable housing units.

This activity is very dependent on available market opportunities. In 2018, BHP acquired an apartment complex (called Twenty37) using a variety of sources, including a Line of Credit. In 2019, BHP spent \$1,446,825 of MTW funds to finance the repayment of the Line of Credit which equates to five units. In 2020, BHP used \$530,941 of MTW funds to finance further repayment of the Line of Credit which equals two additional units at Twenty37. This property is part of BHP’s Affordable Housing Program and targets households earning less than 60% AMI. There was no activity for 2021.

This was not a rent reform activity and no hardship was created.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
HC #1 – Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Zero	Zero	2021 – 0; 2020 – 2 units; 2019 – 5 units; 2018 – 10.6 units; 2017 – 4.4 units; 2016 – 6 apartments, and 5.25 acres of land; 2015 – 0	Yes
HC #2 – Number of housing units preserved	Zero	Zero	2021 – 0; 2020 – 0;	Yes

for households at or below 80% AMI that would otherwise not be available (increase).			2019 – 0; 2018 – 0; 2017 – 0; 2016 – 0; 2015 – 0	
HC #5 – Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	Zero	Zero	2021 – 0; 2020 – 0; 2019 – 0; 2018 – 0; 2017 – 0; 2016 – 0; 2015 – 0	Yes
CE #4 – Amount of funds leveraged in dollars (increase)	Zero	Zero	2021 – 0; 2020 – 0; 2019 – 0; 2018 - \$5,030,545; 2017 – \$4,565,559; 2016 – \$781,469; 2015 – 0	Yes

**c. ACTUAL NON-SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**d. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

There have been no changes to the metrics or data collection methodology.

**e. ACTUAL SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The success of this activity is dependent on timing and availability of funds and market-driven opportunities. Benchmarks are all set at zero, as it is impossible to predict in any given year the number of units we may acquire or develop.

ACTIVITY 2016–1

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

Activity 2016-1 replaced and amended Activity 2014–1: Rent Reform for Housing Choice Work-able Families. The activity was approved and implemented in 2016. No other amendments have been made to this activity since 2016.

b. DESCRIPTION/IMPACT/UPDATE

This activity is specifically for work-able families in the Housing Choice Voucher Program. The elements included in this rent reform are:

- *Flat tiered rent system*: total tenant payment is calculated using a two-step system. The family size and gross income place the family 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 exceeds the payment standard is added.
- *Minimum rent*: the minimum rent is based on bedroom size and ranges from \$120 for a zero bedroom to \$180 for a four bedroom.
- *Biennial recertification*: households are recertified every two years.
- *No interim recertification*: all interim recertifications were eliminated except for family composition or status changes, or if the family moves. Exceptions are made based on extenuating circumstances. If the household is claiming income that places them in the lowest income tier, all increases in income must be reported until the family's income places them into income tier two.
- *Flat fee per ineligible family member*: for those household members who are not legally eligible to receive housing assistance, a flat fee of \$125 per member per month is added to their total tenant payment.
- *Annual income*: The way income is calculated also changed under this activity and is either (1) current, stable income or (2) past two-year history of income. If a family reports zero income at the time of recertification, and there is a history of income, an average of the past two years is included.

There were two different hardship cases for this activity.

- *Maximum rent increases:* In 2017, all hardships for this group of work-able families were discontinued due to experiencing a change in family composition, income, contract rent increases, moving from one unit to another, or leaving the program. No further hardships were granted for this group.
- *No interim recertification:* In 2021, we received 20 requests for an interim recertification due to loss of income. Of these 20 requests, 12 were approved for an interim to be processed and their rent portion was adjusted accordingly. Of the 8 that were denied, one family was referred to the Safety Net Program and received multi-month assistance in the amount of \$1,000. The Safety Net Program was created in 2014, funded with \$25,000 and has a balance of \$4,770 remaining. With COVID, BHP created a simple affidavit that households used to claim loss of income due to COVID related issues. In 2021, we had a total of 66 requests using the COVID affidavit that was created. Fourteen were requests for the 60-day reduction in rent, 24 were for the 90-day reduction in rent and 28 were for the 120-day reduction in rent.

When this activity was first implemented, all households recertified at the same time, to simplify the research being done by the University of Colorado Boulder. This study was completed in 2018. In 2019 and 2020, recertification dates were matched to the lease renewal dates for all work-able families, both the tenant-based and project-based voucher holders. Recertifying hundreds of households at the same time was conducive to the research being done, but difficult for staff to manage. The conversion of 279 public housing units in 2015 and 33 units in 2020 increased the number of work-able families on the project-based voucher program. Baselines were adjusted in 2020 to reflect all the work-able families.

Average rent burden for families who were recertified in 2021 is 23%. Average income increased in 2021 to \$32,713 after a dip from 2019 to 2020 (\$31,788 in 2019 versus \$28,535 in 2020). Four families’ income increased to the point where they were able to pay the full contract rent. They were removed from the program after the 180-day safety net was provided.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
CE #1 – Total cost of task (decrease)	\$35,235 (1,305 staff hours x \$27 per hour)	\$21,141 (40% reduction over the two-year recertification period)	\$8,910 (75% reduction)	Yes

CE #2 – Total time to complete the task in staff hours (decrease)	1,305 total staff hours (3 staff hours per recertification X 435 recertifications)	783 hours (40% reduction over the two-year recertification period)	330 hours (110 recerts, 75% reduction)	Yes
CE #5 – Tenant Rent Share in dollars (increase)	\$393 (this number is prior to any rent reform being implemented)	\$365 (Increase of no more than 7%)	\$760 (increase of 93.6%)	No
SS #1 – Increase in household income	\$17,669	\$20,904 (Increase of 2%)	\$32,713 (increase of 51.5%)	No
SS #3 – Increase in positive outcomes in employment status: <ul style="list-style-type: none"> <li>- Full Time</li> <li>- Part Time</li> <li>- Educational Program</li> <li>- Job Training</li> <li>- Unemployed</li> <li>- Other</li> </ul>	Employed full time – 98; Employed part time – 65; Unemployed – 24; Other – 17	Full time: 104 (increase of 2%) Part time: 108 (increase of 2%) Educational Program: no change Job Trainee: no change Unemployed: 43 (decrease of 2%)	Employed full time – 64 (53% decrease); Employed part time – 19 (242% decrease); Educational program – 0; Job training – 0; Unemployed – 15 (60% decrease); Other – 2 (725% decrease)	No
SS #4 – Number of households receiving TANF (decrease)	15 households	No decrease	6 households	No
SS #5 – Number of households receiving services aimed to increase self-sufficiency	Zero	No increase	Zero	Yes
SS #8 – Number of families moved to self-sufficiency. Self-sufficiency defined as exiting program and moving into market rental or home ownership	Zero	1 (one)	4	Yes

c. ACTUAL NON-SIGNIFICANT CHANGES

Revisions were made to the original activity (2014-1) which were included in this activity (2016-1). No other changes have been made to this activity.

d. ACTUAL CHANGES TO METRICS/DATA COLLECTION

With the 2015 conversion of 288 public housing units to the project-based voucher program, the work-able families were divided into two groups. The original Housing Choice work-able families recertified every even year, effective June 1. The converted public housing work-able families recertified every odd year, effective October 1. Beginning in 2019, we no longer recertified all the work-abled families effective the same date, but rather on their lease renewal date. In 2020, the baselines were updated to include both groups. Work-able families continue to recertify every two years based on their admission date to the program, or their lease renewal date.

e. ACTUAL SIGNIFICANT CHANGES

Significant changes were made to the original activity (2014-1). The activity was re-proposed and approved in 2016 as Activity 2016-1.

f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

There are challenges related to the benchmarks. Households enter and leave the program every year which affects the original benchmark. Increases in income are determined by several different variables (economy, job market, households participating, etc.), which in turn effect the amount of rent that households pay. Households may choose to pay a higher amount of rent if they wish to rent a unit larger than their voucher size, or a unit that is more expensive. Households are not required to report changes in income until their next regularly scheduled recertification provided their rent is based on a minimum of \$6,000 in income. One possible scenario is a family loses income, an interim is processed to include \$6,000 of TANF benefits and the family is then not required to report income changes until the next regularly scheduled recertification. The data is not “real-time” and could be almost two years old when metrics are determined for the annual report.

ACTIVITY 2016–2

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

Activity 2012–2, Rent Simplifications for Households who are Elderly and/or Persons with Disabilities, was approved and implemented in 2012. This activity was amended under Activity 2014–3. Both these activities were replaced with Activity 2016–2, which was approved and implemented in 2016. No further amendments have been made to this activity.

**b. DESCRIPTION/IMPACT/UPDATE**

This activity is a simplified rent structure for households who are elderly and/or persons with disabilities: 1) rent based on 26.5% of gross income; 2) triennial recertification; 3) income disregard; 4) a limit on interim decreases; and 5) flat fee of \$125 per ineligible family member per month.

The hardship capped their rent increase at 7% provided all other variables (such as income, contract rent, utility allowance, etc.) remained the same. Below are the dates and number of households who continue to receive a hardship:

- December 31, 2013 – 57 households
- December 31, 2014 – 41 households
- December 31, 2015 – 25 households
- December 31, 2016 – 19 households
- December 31, 2017 – 16 households
- December 31, 2018 – 9 households
- December 31, 2019 – December 31, 2021 – 6 households

In 2021, the hardship continued for the six households that were receiving the hardship in 2019.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
CE #1 – Total cost of task in dollars (decrease) triennial recertification schedule	2012: cost of \$46,332 (1,782 staff hours x \$26 per hour with an average of 3 hours per recertification)	\$15,290 (Reduce total number of recertifications to 198 or less than 606 hours)	\$13,026 (501 hours, 72% reduction)	Yes

CE #2 – Total time to complete the task in staff hours (decrease) triennial recertification schedule	2012 total staff time of 1,782 (3 hours average per recertification x 594 annuals processed)	588 hours (Reduction of hours in staff time of less than 66%)	501 hours (167 recertifications, 72% reduction)	Yes
CE #2 – Total time to complete the task in staff hours (decrease) elimination of medical deductions	In 2011, 232 households had medical deductions, average was 1 hour per recertification to calculate these deductions	Zero hours	2012: Reduction in staff time of 232 hours, equals staff savings of \$6,032 = 232 x \$26 per hour)	This outcome was achieved in 2012, and BHP continues to realize savings due to elimination of medical deductions from the calculation
CE #3 – Average error rate in completing a task as a percentage (decrease)	50% potential for errors calculating medical deductions	Decrease to zero potential	Zero (all deductions have been eliminated)	Yes
CE #5 – Tenant Rent Share in dollars (increase)	Average Public Housing: \$235 Average Housing Choice: \$274	Zero increase	Public Housing: increase of \$35 (total \$270) Housing Choice: increase of \$87 (total \$361)	No
SS #1 – Increase in household income	\$11,616 Average household income at 12/31/13	\$11,848 (Increase of 2%)	\$18,155 (increase of 56%)	Yes



<p>SS #3 – Report the following separately for each category:</p> <ol style="list-style-type: none"> <li>(1) Employed Full-Time</li> <li>(2) Employed Part-Time</li> <li>(3) Enrolled in Educational Program</li> <li>(4) Enrolled in Job Training Program</li> <li>(5) Unemployed</li> <li>(6) Other</li> </ol>	<p>65 total households employed (when this metric was written in 2012, it was not separated by category)</p>	<p>66 (Increase of 1% increase (when this metric was written in 2012, it was not separated by category))</p>	<p>Employed full time – 7;  Employed part time – 15;  Educational program – 0;  Job training program – 0;  Unemployed – 6;  Others – 141 (main source of income is SS or SSDI based on population type)</p>	<p>No, there was a 66% decrease in number of households that were employed, which makes sense based on the population being elderly and/or disabled households</p>
<p>SS #8 – Number of households transitioned to self-sufficiency (increase). Self-sufficiency defined as exiting program, moving into market rental or home ownership</p>	<p>Zero</p>	<p>Zero</p>	<p>Zero</p>	<p>This activity applies to households who are elderly and/or disabled and are not expected to obtain self sufficiency</p>

**c. ACTUAL NON-SIGNIFICANT CHANGES**

There have not been any non-significant changes to this activity.

**d. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

There have been no changes to the metrics or data collection methodology.

**e. ACTUAL SIGNIFICANT CHANGES**

Significant changes were made to the original activity 2012-2 under activities 2014-3 and 2016-2. All the elements of activities 2012-2 and 2014-3 are included in Activity 2016-2.

f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

There are several variables that go into the benchmarks. The benchmark for income was set in 2012 and does not account for inflation. With the triennial recertification cycle, we are not capturing any Cost-of-Living Adjustment that Social Security recipients receive on an annual basis. This delayed recalculation causes a higher-than-normal increase in the rent portion paid by the families at the time of recertification every three years (instead of experiencing a smaller increase year over year). The number of households who are elderly and/or persons with disabilities can fluctuate from year to year based on who enters the program through the lottery system. This activity was not designed to increase employment outcomes as the focus is on households with elderly and/or persons with disabilities and any employment income that can be earned is arbitrary.

ACTIVITY 2016–3

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

Activity 2016-3 – Landing Landlords, was approved in 2016. One element (Moving Compliance) was implemented in 2016 and the other three elements were implemented in 2018. No amendments have been made to this activity.

b. DESCRIPTION/IMPACT/UPDATE

The goal of this activity was to increase participation by private landlords in the Housing Choice Voucher program. There are four elements to this activity:

- Landlord Incentive Payment/Signing Bonus
- Landlord Assurance Fund (formerly known as the Damage Claim Fund)
- Security Deposit Revolving Loan Fund
- Moving with Continued Assistance/Moving Compliance

The Housing Choice Voucher Program was over leased beginning in January 2016 and no new vouchers had been issued since early 2016. The first three elements of this activity were implemented in August 2018 when vouchers were issued.

For the Landlord Incentive Payment, 27 new landlords agreed to participate in the program in 2021, for a total of \$5,400 paid in incentives.

In 2018, the Damage Claim Fund was expanded with our regional partners to include all voucher holders within Boulder County and renamed the Landlord Assurance Fund. There are four agencies within Boulder County that administer vouchers (Boulder Housing Partners, Boulder County Housing Authority, Longmont Housing Authority and Mental Health Partners – contract administrator for the

Colorado Division of Housing vouchers). It is funded by Boulder County, the City of Boulder, the City of Longmont, and the Housing Authorities. In 2021, we received and approved one request, which resulted in a \$2,000 reimbursement to the landlord.

In 2021, we had five requests for the Security Deposit Loan fund. One participant found a different source to pay the security deposit, one other did not follow through on leasing up with the voucher. Seven loans were requested in 2020 and six were paid off in 2021. The one that was not paid off was evicted from housing and defaulted on the loan.

The fourth element, Moving with Continued Assistance, was implemented in 2016. During 2021, we had 151 requests to move.

Of these 151 requests, 108 were found to be in compliance. Of these 108:

- 81 moved with a voucher
- 17 cancelled their move
- 10 had not yet moved as of 12/31/21

There were 13 instances where we received no information from the landlord and therefore, they were determined to be in compliance.

Of these 13:

- 4 moved with a voucher
- 8 moved without a voucher
- 1 ported out of our jurisdiction

Thirty households were asked to come into compliance with their current landlord prior to being able to move with continued assistance. Of these 30:

- 13 moved out
  - 5 with a voucher
  - 4 without a voucher
  - 4 were terminated from the program due to non-compliance
- 7 came into compliance but had not yet moved as of 12/31/21
- 10 did not move
  - 5 are still in place
  - 5 were terminated from the program due to non-compliance

This is not a rent reform activity and no hardship was created.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
HC #5 – Number of households able to move to better unit and/or neighborhood of opportunity as a result of the activity	Zero	Zero	Zero	Yes

**c. ACTUAL NON-SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**d. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

There have been no changes to the metrics or data collection methodology.

**e. ACTUAL SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

The standard metric for this type of activity does not apply to Boulder, as all of Boulder’s neighborhoods are neighborhoods of opportunity.

**ACTIVITY 2016–4**

**a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Activity 2016-4, Bringing School Home Referral Process, was approved and implemented in 2016. There have been no amendments to this activity.

**b. DESCRIPTION/IMPACT/UPDATE**

Activity 2016-4, Bringing School Home Referral Process, is the first step in our bigger program, Bringing School Home, which is designed to positively disrupt factors working against the success of children. This activity allows us to bring families with children aged 0 to 5 into

five of our sites where services are offered through the Bringing Home School Program. In 2021, 25 families entered the program. The families agree to accept services with the goal of children being kindergarten ready, succeed in school and eventually be self-sufficient.

This is not a rent reform activity and no hardship was created.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
SS #5 – Number of households receiving services aimed to increase self-sufficiency (increase)	Zero	100% of all new admissions based on vacant units	25 families (100% of new admissions)	Yes
SS# 8 – Number of households transitioned to self-sufficiency (increase)	Zero	Zero	Zero	Yes
HC #3 – Average applicant time on wait list in months (decrease)	24 months	2 months	3.4 months (104 days average)	No
HC #4 – Number of households at or below 80% AMI that would lose assistance or need to move (decrease). This activity targets families with children	Zero	Zero	Zero	Yes
HC #5 – Number of households able to move to a better unit and/or	Zero	Zero	Zero	Yes

neighborhood of opportunity as a result of the activity (increase)				
HC #7 – Number of households receiving services aimed to increase housing choice (increase)	Zero	Zero	Zero	Yes
CE #4 – Amount of funds leveraged in dollars (increase)	Zero	\$9,408	\$16,800	Yes

**c. ACTUAL NON-SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**d. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

There have been no changes to the metrics or data collection methodology.

**e. ACTUAL SIGNIFICANT CHANGES**

There have been no changes made to the activity since it was approved and implemented.

**f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

The benchmark of two months wait time was an estimate created without historical data on our new process. The pandemic created difficulties in connecting with applicants and for them to be able to obtain the required documents, which increased the wait time.

**ACTIVITY 2018-1**

**a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Activity 2018-1 Project Based Waivers was a consolidation of all the previous project-base voucher waivers from activities 2012-1, 2014-6 and 2015-2 into one, and introduced three new elements. This activity was approved and implemented in 2018. No amendments have been made since combining the waivers into one activity.

b. DESCRIPTION/IMPACT/UPDATE

Since becoming a participating Moving to Work agency, Boulder Housing Partners has implemented several activities related to the Project-Based Voucher rules. This activity includes the following elements:

- *Waive the 20% cap on project-based vouchers* – allows BHP to project base more than 20% of our voucher authority.
- *Definition of excepted units* – allows BHP to project base vouchers at 100% of the units in advance of offering services.
- *Waive the competitive bidding process* – this requirement is waived when BHP is placing vouchers in a project owned by BHP.
- *Rent limits and rent reasonableness* – allows BHP to establish appropriate rent limits and conduct our own rent reasonableness tests for our project-based voucher contracts, using data gathered from market studies, Fair Market Rents, current market comparisons and average rents.
- *Allow owner/service partner to hold wait list* – 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* – allows in-house staff that has been certified in Housing Quality Standards to conduct inspections at BHP-owned properties.
- *Allow participants who are no longer receiving housing assistance payments to remain on the voucher* – allows families to stay on the voucher program even when their portion of rent is higher than the contract rent, which also allows them to be eligible for the next available voucher if assistance would allow them to live in the private market.
- *Allow participant families to continue to pay rent according to their income* – allows families to stay in place at a project-based voucher community and pay rent according to their income when it exceeds the contract rent that has been set under the contract.

This is not a rent reform activity and no hardship was created.

In March 2021, BHP project based 20 vouchers at the 30Pearl. This activity was used to set the rents and waive the competitive process.

At the end of 2021, we had 20 families who would have been graduated from the program and asked to move without rental assistance due to increases in income that allowed them to pay the entire contact rent. We had 13 households who recertified in 2021 and were allowed to stay on the program without receiving any housing assistance. With this waiver, these 33 households have stayed in place, continue to be eligible for the next available voucher and pay rent according to their income.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
CE #1 – Total cost of task (decrease) elimination of competitive process	\$1,680	Reduce to \$0	Zero	Yes
CE #2 – Total time to complete the task in staff hours (decrease) elimination of competitive process	40 hours	Zero	Zero	Yes
CE #1 – Total cost of task (decrease) average cost of an independent consultant to determine reasonable rent	\$6,000	Reduce to \$130	\$130	Yes
CE #2 – Total time to complete the task in staff hours (decrease) independent consultant to determine reasonable rent	5 hours	Zero	Zero	Yes



CE #1 – Total cost of task (decrease) time to maintain wait list	\$2,340 (90 hours x \$26 per hour)	Zero	Zero	Yes
CE #2 – Total time to complete the task in staff hours (decrease) to maintain wait list	90 hours	15 hours (1 hour per move-in)	54 hours	No
HC #1 – Number of new housing units made available for households at or below 80% AMI (increase)	Zero	Zero	20 at 30 Pearl	Yes
HC #2 – Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase)	Zero	Zero	Zero	Yes
HC #3 – Average applicant time on wait list in months (decrease)	31.5 months	2 months	3.5 months	No
HC #4 – Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	Zero	Zero	Zero	Yes

c. ACTUAL NON-SIGNIFICANT CHANGES

There have not been any non-significant changes to this activity.

d. ACTUAL CHANGES TO METRICS/DATA COLLECTION

The number of project-based vouchers has increased from 2012 when BHP entered the demonstration program and first implemented a waiver. In 2012, BHP had 89 project-based voucher units. We added 31 units in 2014; 279 units in 2015 with the conversion of the public housing units under RAD/Section 18; and 33 units in November 2020 with another public housing conversion under Section 18 disposition. In March 2021, we project-based 20 units at BHP's newest development 30Pearl to serve households who have an intellectual and/or developmental disability. As of December 31, 2021, 452 vouchers are project based. We continue to monitor the metrics regarding wait time and applicant processing. In 2022, we will discuss different internal processes to determine if we can make this process easier for everyone and reduce the wait time for all applicants.

e. ACTUAL SIGNIFICANT CHANGE

This activity consolidated three previously approved activities into one, while adding three new elements to the activity in 2018.

f. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

We had 54 total move-ins this year which is more than anticipated when the benchmark was set. The average time on the waiting list is higher than hoped for. Wait lists are opened for a few days at a time. In that time frame, 300 – 500 applicants apply. It takes time to go through all those applicants when the turnover is low.

ACTIVITY 2020-1

g. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

Activity 2020-1 was proposed in our 2020 Plan and approved by HUD in 2020. This activity was fully implemented in 2021. The delay was due to the pandemic and having enough time to focus on software system upgrades for this to work properly.

h. DESCRIPTION/IMPACT/UPDATE

This activity changes the income and escrow calculations for families living at our Woodlands community and participating in the Family Self Sufficiency Program. Rent is calculated in the same manner as our work-able families under Activity 2016-1. The escrow calculation has two parts: escrow based on earned income and goals achieved.

Beginning in 2020, all new families admitted to the program have their rent and escrow calculated in this way. Existing families were grandfathered in and allowed the option to opt into the new rent and escrow calculations as of their June 2020 annual recertification. Due to the pandemic, this offer was rescinded from the existing families as time and focus were needed elsewhere. This was offered to existing families in 2021 and one family opted into the new rent and escrow calculation.

Nine families entered the program in 2021. Regularly scheduled recertifications are every two years. Escrow will be earned at the one-year anniversary of entering the program. Escrow based on goals achieved were awarded in 2021 to five of the ten families who entered the program in 2020. Total escrow earned by these five families was \$900. Five of the families did not meet any goals in the first year and therefore did not earn escrow.

Only one family opted into the program in 2021 and no hardships was needed.

Metric	Baseline	Benchmark	Outcome	Benchmark achieved?
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)	N/A	Metric to be evaluated in 2022
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)	N/A	Metric to be evaluated in 2022
CE #5 – Total household contributions towards housing assistance (increase)	\$590 per household	\$632 (Increase of 7%, includes hardship upon transition if applicable)	N/A	Metric to be evaluated in 2022

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)	N/A	Metric to be evaluated in 2022
SS #1 – Average earned income of households affected by this policy in dollars (increase)	\$22,033	\$22,474 (Increase of 2%)	N/A	Metric to be evaluated in 2022
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)	N/A	No families graduated from program under this escrow calculation in 2021
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	N/A	Metric to be evaluated in 2022
SS #4 – Number of households receiving TANF (decrease)	1	None	N/A	Metric to be evaluated in 2022
SS #5 – Number of households receiving	35	35	N/A	Metric to be evaluated in 2022

services aimed to increased self-sufficiency				
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	N/A	Metric to be evaluated in 2022

i. **ACTUAL NON-SIGNIFICANT CHANGES**

There have not been any non-significant changes to this activity.

j. **ACTUAL CHANGES TO METRICS/DATA COLLECTION**

Metrics have not been measured in 2021 due to the timing of the recert schedule and admissions to the program, along with the fact that no family has graduated from the program after having opted into this method of rent and escrow calculation.

k. **ACTUAL SIGNIFICANT CHANGE**

No changes have been made to this activity.

l. **CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

Metrics will be measured in 2022 based on the recertification schedule and will only apply to the families who moved in during 2020.

## **ACTIVITIES NOT YET IMPLEMENTED**

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

## **ACTIVITIES ON HOLD**

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BHP does not have any activities that have been placed on hold.

## **CLOSED OUT ACTIVITIES**

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### **ACTIVITY 2012–1**

MTW Activity 2012–1, Allow BHP to Commit Project-Based Vouchers to cover 100% of the units at converted public housing developments was incorporated into MTW Activity 2018–1. The metrics have been included with MTW Activity 2018–1. This activity was approved in 2012 and implemented in 2015 with the conversion of public housing units to Housing Choice Vouchers. Metrics were reported in the Annual Reports for 2012 through 2017. This activity was closed out in 2018. Metrics for 2018 and future years are reported under Activity 2018–1.

### **ACTIVITY 2012–2**

MTW Activity 2012–2, Rent Simplification for Elderly and Disabled Households was approved and implemented in 2012. It was amended under Activity 2014–3. Further changes were made to the rent reform in 2016 and all aspects of this activity were incorporated into Activity 2016–2, closing it out in 2016. Metrics were reported in the Annual Reports for 2012 and 2013. Metrics for 2014 and 2015 were reported under Activity 2014–3. Metrics from 2016 forward are included in Activity 2016–2.

### **ACTIVITY 2012–3**

Activity 2012–3, Rent Simplification for Family Households, was approved and implemented in 2012 and closed out in 2016. All elements of this activity were incorporated into Activity 2016–1. Metrics for this activity were reported in the Annual Reports for 2012 through 2015. Metrics from 2016 forward are included in Activity 2016–1.

### **ACTIVITY 2012–7**

MTW Activity 2012–7, Implement a Landlord Self-Certification System for HQS Inspections in the Voucher Program, was approved in 2012 but never implemented. The original activity would have placed a greater, undue burden on landlords. Therefore, the activity was re-written and approved in the 2013 MTW Annual Plan under Activity 2013–1 and allows the inspection cycle to follow the recertification schedule.

#### **ACTIVITY 2014–1**

MTW Activity 2014–1, Rent Reform for Housing Choice Work-able Families was implemented in 2014, and amended under Activity 2016–1. All aspects of the original activity were included in the 2016 Activity. This activity was approved and implemented in 2014 and closed out in 2016. Metrics were reported in the Annual Reports for 2014 and 2015. Metrics from 2016 forward are included under Activity 2016–1.

#### **ACTIVITY 2014–2**

MTW Activity 2014–2: Rent Reform for Public Housing Work-able Families was never implemented. With the conversion of six of the eight public housing sites (85% of the units) under Section 18 disposition and RAD in 2015, the households were transitioned to the voucher program. This activity was approved in 2014 and never implemented due the decrease in the number of work-able families in the public housing units, and the goal BHP has of converting the final 49 public housing units to the Housing Choice Voucher program.

#### **ACTIVITY 2014–3**

MTW Activity 2012–2, Rent Reform for Elderly and Disabled Households was added to under Activity 2014–3 Limit of One Interim Decrease Recertification per year for elderly households and persons with disabilities. Further changes were made to the rent reform in 2016 and all aspects of this activity were incorporated into Activity 2016–2. This activity was approved and implemented in 2014 and closed out in 2016. Metrics have been reported in Annual Reports for 2014 and 2015. Since 2016, metrics have been included in Activity 2016–2.

#### **ACTIVITY 2014–4**

MTW Activity 2014–4, Removed the Flat Rent Option for all Public Housing Households was approved and implemented in 2014. Between 2014 and 2020, BHP has disposed all but 15 units of public housing using the Rental Assistance Demonstration Program or Section 18. The population that the remaining 15 units serve very rarely use this option. The activity has been closed out with this 2021 report. Final metrics are included in this report.

#### **ACTIVITY 2014–5**

Activity 2014–5 Changes the Mobility Options for Families who live at Woodlands, a project-based voucher community, and participate in the Family Self-Sufficiency (FSS) Program. This activity was approved and implemented in 2014. BHP made changes to the Admin Plan in 2021 which cancels out the focus of this activity. Final metrics for this activity are included in this 2021 Annual Report. The Activity has been closed out as of December 31, 2021.

### **ACTIVITY 2014-6**

MTW Activity 2014-6, Rent Limits and Rent Reasonableness for Project-Based Vouchers was incorporated into MTW Activity 2018-1. This activity was approved and implemented in 2014 and closed out in 2018. Metrics were provided for this activity in Annual Reports for 2014-2017. Current metrics have been included with MTW Activity 2018-1.

### **ACTIVITY 2015-2**

MTW Activity 2015-2, Project-Based Voucher Applicant Process was incorporated into MTW Activity 2018-1. This activity was approved in 2015, implemented in 2015 and closed out in 2018. Metrics were provided for this activity in the Annual Reports for 2015, 2016 and 2017. Current year metrics are included with Activity 2018-1.



# V. PLANNED APPLICATION OF MTW FUNDS

## A. FINANCIAL REPORTING

**i. Available MTW Funds in the Plan Year**

The MTW PHA shall submit unaudited and audited information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA), or its successor system.

**ii. Expenditures of MTW Funds in the Plan Year**

The MTW PHA shall submit unaudited and audited information in the prescribed FDS format through the FASPHA, or its successor system.

**iii. Describe Application of MTW Funding Flexibility**

The MTW PHA shall provide a thorough narrative of actual activities that use only the MTW funding 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 (IV) of the Annual MTW Report. The MTW PHA shall also provide a thorough description of how it used MTW funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

APPLICATION OF "MTW FUNDING" FLEXIBILITY
Activity 2013-4 allows for the use of Replacement Housing Factor Funds for other affordable housing. Activity 2015-1 allows for MTW funds to be used on other local, non-traditional affordable housing.

## B. LOCAL ASSET MANGEMENT PLAN

i. Did the MTW PHA allocate costs within statute in the Plan Year?

Yes

ii. Did the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?

No

iii. Did the MTW PHA provide a LAMP in the appendix?

No

iv. If the MTW PHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that the MTW PHA did not make any changes in the Plan Year.

N/A

## VI. ADMINISTRATIVE

### A. REVIEWS, AUDITS AND INSPECTIONS

In 2021, no audits or inspections were conducted. A virtual MTW HUD site visit was conducted in June. No formal recommendations or comments resulted from the on-site visit.

### B. EVALUATION RESULTS

BHP worked in partnership with the University of Colorado (CU) to develop the rent-controlled study to evaluate the effects of the flat tier rent reform structure that was implemented in 2014. Due to the size of our work-able family group, it was not feasible to compare a control group to a treatment group. Instead, households were compared against themselves over time to ascertain if changes occurred and if so, if they could be attributed to the interventions put in place through the MTW Program. The baseline surveys were conducted in 2014 and the final survey was conducted in 2018. Information about the evaluation can be found in the 2014 – 2018 Annual Reports. Currently, there are no active evaluations outside of annual monitoring of all MTW Activities.

### C. MTW STATUTORY REQUIREMENT CERTIFICATION

Boulder Housing Partners hereby certifies that the three statutory requirements below have been met:

- ensuring that at least 75% of households assisted are very low-income;
- continuing to assist substantially the same total number of households as would have been assisted had we not participated in the MTW demonstration; and
- maintaining a comparable mix of households (by family size) served as would have been served had we not participated in the MTW demonstration.

### D. MTW ENERGY PERFORMANCE CONTRACT (EPC) FLEXIBILITY DATA

Boulder Housing Partners does not possess flexibility regarding Energy Performance Contracts.