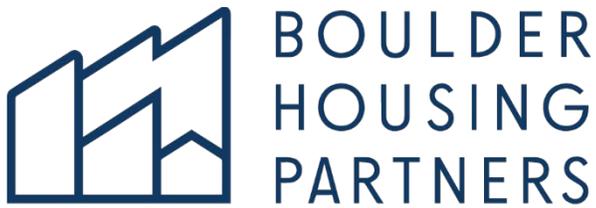


Moving To Work



2022 ANNUAL PLAN





Boulder Housing Partners (BHP) provides housing assistance to more than 2,500 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

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Boulder Housing Partners

2022 MTW Annual Plan

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September 13, 2021 Draft released for public review
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 October 13, 2021 Approved by BHP Board of Commissioners
 October 13, 2021 Submitted to HUD for approval

Section I: Introduction

Boulder Housing Partners (BHP) became part of the Moving to Work (MTW) Demonstration Program in 2012. This 2022 Plan represents our eleventh year participating in this program.

Over the last ten years, BHP has accomplished many objectives, which line up with the statutory goals of the program, and are:

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.

Highlights of accomplishments so far:

- Simplified the rent calculation for households who are elderly or include a person with a disability, allowing them to recertify once every three years
- Simplified the rent calculation for work-able families, allowing them to keep any income increases received until the next regularly scheduled recertification which occurs every two years
- Transformed 322 (95%) of our public housing units which included complete renovations on all the units both inside and out, added and/or upgraded community centers at six of the sites, all while maintaining the same level of deep affordability which allows BHP to continue to serve the same population
- Created our Bringing School Home program which started at our transformed public housing sites and is being expanded to other sites (described below)
- Purchased 26 units of local, non-traditional affordable housing units
- Continued our partnership with Safehouse Progressive Alliance for Nonviolence using vouchers as transitional housing to house and serve eight families who are victims of domestic violence

In our experience, we 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 began the transformation and preservation of our public housing units. Renovations were completed by the end of 2016 on 279 units. An additional 33 units will be renovated by the end of 2021. Bringing School Home was implemented at each of the sites upon completion of the renovations, which 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.

The next ten years will include 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. We continue to seek funding to increase Bringing School Home's capacity by scaling up to be able to reach all 694 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

At the beginning of 2022, BHP continues to own 14 units of public housing at Arapahoe Court. BHP will focus on a Section 18 Demolition and Disposition action for this property. 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, along with the addition of a Program Navigator position, 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; 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 15 total units in the public housing program and 923 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) FILL IN NAME AND NUMBER	0/1 Bdm	2 Bdm	3 Bdm	4 Bdm	5 Bdm	6+ Bdm	TOTAL UNITS	POPULATION TYPE**	Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing / Vision)
None	0	0	0	0	0	0	0	N/A	0	0
Total Public Housing Units to be Added in the Plan Year:							0			

* The federal accessibility standard under HUD’s Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance (24 CFR 8.32). HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD’s Notice on “Instructions for use of alternative accessibility standard,” published in the Federal Register on May 23, 2014 (“Deeming Notice”) for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>

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

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

N/A

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
None in 2022	0	N/A
TOTAL: Public Housing Units to be Removed in the Plan Year	0	

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
Mount Calvary	15	No	Vouchers will be placed once construction is completed in 2022/2023. These units will serve seniors.
TOTAL: Planned new Project Based Units in Plan Year	15		

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. Select one of the of the following to indicate the *Planned Status by the end of the Plan Year: “Committed,” “Leased,” or “Issued.” In column three, 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	Leased	No	Permanently supportive housing for the chronically homeless
30Pearl	20	Leased	No	Housing for households with intellectual and development disabilities
Broadway East	44	Leased	No	Public housing units converted in 2006
Diagonal Court	30	Leased	Yes	Public housing units converted in 2015
Holiday McKinney	10	Leased	No	Permanently supportive housing for the chronically homeless
Iris Hawthorn	14	Leased	Yes	Public housing units converted in 2015
Kalmia	49	Leased	No	Public housing units converted in 2015
Madison	33	Leased	No	Public housing units converted in 2020
Manhattan	41	Leased	Yes	Public housing units converted in 2015
Northport	50	Leased	Yes	Public housing units converted in 2015
Walnut Place	95	Leased	No	Public housing units converted in 2015
Woodlands	35	Leased	No	Family Self Sufficiency Program
Total: Planned Existing Project-Based Vouchers	432			

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
There are no other planned changes in 2022.

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 \$115,000 in capital improvements at Arapahoe Court, which will include fire systems upgrades, replacing windows and air conditioners, repairing the west fence retaining wall, installing gutter covers, and adding a fob access to the laundry room door. In accordance with Activity 2015-1, we plan to spend \$1,500,000 on unit acquisition in 2022, \$300,000 will come from capital funds and \$1,200,000 will come from unspent HAP funds.

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	156	13
MTW Housing Choice Vouchers (HCV) Utilized	10,800	900
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	312	26
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	11,268	939

* "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	312	26
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	There are no anticipated issues with leasing PH units.
MTW Housing Choice Voucher	There are no anticipated issues with leasing the vouchers.
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	0	Closed	Yes
Arapahoe	Site based wait list	46	Closed	If needed

Please describe any duplication of applicants across waiting lists:

There is no duplication between the two 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	The lottery is open two times per year.

Section III: Proposed MTW Activities

Boulder Housing Partners is not proposing any new activities for 2022.

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 2022.

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 2022.

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 2022.

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. In 2013, for all households who are elderly or a person with disabilities, the inspection schedule follows the triennial recertification schedule. In 2014, inspections for the work-abled family households were aligned with the biennial recertification schedule. This activity was approved and implemented in 2013 and 2014. BHP does not anticipate any changes to the activity or its metrics in 2022.

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. With the disposition of the majority of the Public Housing units in 2015 and 2020, this activity now only applies to Housing Choice Voucher participants. This activity was approved and implemented in 2013. BHP does not anticipate any changes to the activity or its metrics in 2022.

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 2022.

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 2022.

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 when 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 and 2020 with the conversion of seven public housing properties. With only 15 remaining public housing units, changes to the activity or metrics are anticipated in 2021 and will be reflected in the 2021 Annual Report. No other changes are anticipated for 2022.

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 plans on closing out this activity in 2022. We decided to revert back to the HUD rules, which will allow FSS participants to keep their voucher even if their FSS contract of participation is terminated and allow project-based voucher holders to request the next available voucher to move with after one-year of residency in the project-based voucher unit.

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 4.4 units of affordable housing. In 2018, BHP used MTW funds to purchase an additional 10.6 units. In 2019, we used MTW funds to purchase 5 additional units. In 2020, MTW funds purchased an additional 2 units for a total of 28 units and land. This activity was approved and implemented in 2015. BHP does not anticipate any changes to the activity or its metrics in 2022.

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 recertified every even year effective June 1. The project-based work-abled families recertified every odd year effective October 1. Due to the two groups recertifying every other year, metrics only reflected the group that was recertified in that year. This activity was approved and implemented in 2016.

Beginning in 2020, BHP no longer recertifies 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 (dependent on their original recertification date and date of admission to the program) and metrics will be reflected accordingly. Beginning in 2021, BHP will report on all voucher holders as one group. No changes to the activity or the metrics are anticipated in 2022.

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 2022.

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. A minor change was made to this activity. Originally the security deposit loan term was 12 months. This was shortened to 10 months to allow for a grace period on the front end of the payback and for the loan to be paid in full prior to the lease ending. No further changes are anticipated to the activity or its metrics in 2022.

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. In collaboration with numerous community partners that work with families with young children, 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.

In 2022, BHP will work to bring the wait list for these properties in-house, instead of relying on our partner agency to hold the wait list. BHP has found that the vacancy time has increased due to a delay in referrals being provided by our partner. BHP understands the wait list and application process and will work to reduce the days the units are vacant. We will not change the metrics in 2022.

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 2022.

Activity 2020-1: FSS Rent and Escrow Calculations

BHP received approval in 2020 to implement the same rent structures that are already in place under MTW Activities 2016-1 and 2016-2 for the families living at our Woodlands Community who are receiving services through the Family Self-Sufficiency Program. All new families admitted to this program in 2020 are under the new calculations. The transition period for the existing families was to allow them to opt in at the time of their annual recertification in 2020. Due to COVID-19, we were unable to transition any families to the new calculations. This was offered in 2021 for existing families. BHP made changes in our Admin Plan to allow for any housing choice voucher holder to participate in the Family Self-Sufficiency program. The rent and escrow calculation from this activity will apply to all FSS participants, regardless of where they are living. BHP does not anticipate any changes to the metrics in 2022.

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: Planned Application of MTW Funds

A. PLANNED APPLICATION 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.

Note: the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA’s obligation to annually complete its audited financial statements through HUD’s Financial Data Schedule (FDS).

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	48,300
70600	HUD PHA Operating Grants	10,498,843
70610	Capital Grants	1,625,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0
71100+72000	Interest Income	0
71600	Gain or Loss on Sale of Capital Assets	0
71200+71300+71310+71400+71500	Other Income	17,639
70000	Total Revenue	12,189,782

ii. Estimated Application of MTW Funds

The MTW PHA shall provide the estimated application of MTW funding in the plan year by Financial Data Schedule (FDS) line item. Only amounts estimated to be spent during the plan year should be identified here; unspent funds that the MTW PHA is not planning on expending during the plan year **should not be** included in this section.

Note: the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA’s obligation to annually complete its audited financial statements through HUD’s Financial Data Schedule.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	460,669
91300+91310+92000	Management Fee Expense	225,751
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	10,270
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	15,285
93500+93700	Labor	0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	78,629
95000 (95100+95200+95300+95500)	Total Protective Services	2,688
96100 (96110+96120+96130+96140)	Total Insurance Premiums	18,476
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	5,758
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	0
97100+97200	Total Extraordinary Maintenance	12,715
97300+97350	HAP + HAP Portability-In	9,773,751
97400	Depreciation Expense	18,152

97500+97600+97700+97800	All Other Expense	0
90000	Total Expenses	10,622,144

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

The difference represents possible use of HAP fund on unit acquisition, capital grants revenue and depreciation.

iii. Description of Planned Application of MTW Funding Flexibility

MTW agencies have the flexibility to apply fungibility across three core funding programs’ funding streams – public housing Operating Funds, public housing Capital Funds, and HCV assistance (to include both HAP and Administrative Fees) – hereinafter referred to as “MTW Funding.” The MTW PHA shall provide a thorough narrative of planned activities it plans to undertake using its unspent MTW Funding. 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 funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

PLANNED APPLICATION OF MTW FUNDING FLEXIBILITY
BHP plans to use DDT funds from Kalmia, Walnut Place and Madison to acquire or develop other local affordable housing.

iv. PLANNED APPLICATION OF PHA UNSPENT OPERATING FUND AND HCV FUNDING

Original Funding Source	Beginning of FY - Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$	\$
HCV Admin Fee	\$110,000	\$50,000
PH Operating Subsidy	\$	\$
TOTAL:	\$	\$

Description of Planned Expenditures of Unspent Operating Fund and HCV Funding

The MTW PHA shall provide a description of planned activities and/or use(s) for unexpended Operating Fund and HCV Funding. The original funding source is defined as the legacy MTW PHA’s appropriated Section 8 and Section 9 funding source(s) (HCV HAP, HCV Admin Fee, and PH Operating Subsidy). The MTW agency receives this information in their Annual Renewal Allocation, which provides a breakdown of the annual obligations for HCV HAP. For HCV Admin Fee, the biannual cash management reconciliation includes the HCV Admin Fee that has been earned at two points during the year; midyear at June 30th and end-of-year at December 31st. For the public housing operating fund unspent balance, the MTW PHA may derive their unspent funds by subtracting current assets from current liabilities in the most recent FDS submission. Current assets are the sums of FDS lines 111, 114, 115, 120, 131, 135, 142, 144, and 145. Current liabilities are the sums of FDS line 310 and 343. Table XX below represents the applicable FDS lines with definitions that MTW PHA(s) should utilize to calculate public housing operating fund unspent funds. More information on FDS line items can be found at:

https://www.hud.gov/sites/dfiles/PIH/documents/FDSLineDefinitionGuide_vJuly2020.pdf.

Table XX: FDS Line Items Used to Calculate Public Housing Operating Fund Unspent Funds

FDS Line Number	FDS Line Item	Definition
Current Assets		
111	Cash-Unrestricted	This FDS line represents cash and cash equivalents in any form available for use to support any activity of the program or project.
114	Cash-Tenant Security Deposits	This FDS line represents cash in the Security Deposit Fund.

FDS Line Number	FDS Line Item	Definition
115	Cash-Restricted for Payment of Current Liabilities	This line represents restricted cash and cash equivalents that are only to be expended for specified purposes.
120	Total Receivables	This line represents the total of all receivables less the amounts established as allowances for estimated uncollectible amounts.
131	Investments-Unrestricted	This line represents the fair market value of all investments which can be used to support any activity of a program, project, activity, COCC, or entities.
135	Investments-Restricted for Payment of Current Liability	This line represents the fair market value of all investments designated for specific purposes that will be used to liquidate a current liability in the next fiscal year or offset unearned revenue.
142	Prepaid Expenses and Other Assets	This line represents all prepaid expenses. These are not expected to be converted.
144	Inter-program-Due From	This line represents amounts due from other PHA projects, programs, and activities of a temporary nature.
145	Assets Held for Sale	This line item represents assets that the entity expects to sell to qualified applicants. This line item is typically used as part of the homeownership program.
Current Liabilities		
310	Total Current Liabilities	This FDS line is the sum of lines 311 through 348 and represents the total of all current liabilities.
343	Current Portion of Long-Term Debt (Capital Projects/Bonds)	This line includes the current portion of debts acquired and debts issued for capital purposes of the PHA/entity.

For HCV funding, the biannual cash management reconciliation for HUD-held reserves includes both HCV and SPV reserves. MTW PHA(s)' accounting records should include sufficient detail to report on the amount that are HCV versus SPV reserves. Where possible, please identify the planned use, the estimated amount, to which funding source the planned use(s) is attributable, as well as the projected timeline or timeline update.

Note: the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule.

BHP plans to use administrative fee revenue on salaries (to fund a Program Navigator position) and the creation of videos for HCV applicants and participants.

* Unspent HAP funding should not include amounts recognized as Special Purpose Vouchers reserves.

** HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan.

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.

N/A

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

i. Description of RAD Participation

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

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

BHP converted 283 units of Public Housing under RAD effective 10/1/2015.

- ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

No

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

N/A

Section VI: Administrative

Board Resolution Submittal

Resolution starts on the following page.

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING
Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2022), 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.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, 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), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents 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 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (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.
- (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.

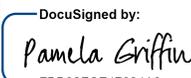
Boulder Housing Partners
MTW PHA NAME

CO016
MTW PHA NUMBER/HA CODE

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

Pamela Griffin
NAME OF AUTHORIZED OFFICIAL

Board of Commissioners Vice Chair
TITLE

DocuSigned by:

FBD92FCE47634A0...
SIGNATURE

10/13/2021
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.**

Documentation of Public Process

The 2022 MTW Annual Plan was made available for public review beginning on September 13, 2021. It was presented to the BHP Board of Commissioners for final approval on October 13, 2021, at which time public review ended. A public hearing was held on September 21, 2021, and there were no attendees. A time for public comment is available at every board meeting. The draft 2022 MTW Annual Plan was presented to the Board at the meeting on September 15, 2021. There were no public comments regarding the Plan. The final 2022 MTW Annual Plan was presented to the Board for adoption at the meeting held on October 13, 2021. There were no public comments regarding the Plan.

Planned and Ongoing Evaluation of the Demonstration

The MTW PHA shall provide a description of any planned or ongoing MTW PHA-directed evaluations of the MTW demonstration and/or of any specific MTW activities (or state that there are none).

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.

One of the many culprits in creating an opportunity gap is a systemic disconnect between families and schools; schools and community; community and family. The Bringing School Home model 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 is working in using housing as a platform to close the opportunity gap and to address educational equity. In partnership with "I Have a Dream" Foundation of Boulder County, Boulder County Housing and Human Services, EFAA (Emergency Family Assistance Association), and other community partners, we are exploring the impact of service-enriched housing that seeks to build on current assets 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?
- 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.

Certification of Payments to Influence Federal Transactions

Department of Housing and Urban Development
Office of Public and Indian Housing

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

DocuSigned by:

D80844704D10413...

Date (mm/dd/yyyy)

9/9/2021

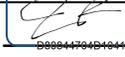
DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB

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

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input 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	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 4c	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency: U.S. Department of Housing and Urban Development	7. Federal Program Name/Description: Moving to Work Demonstration Program CFDA Number, if applicable: _____	
8. Federal Action Number, if known:	9. Award Amount, if known: \$	
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): N/A	b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): N/A	
11. 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.	DocuSigned by:  Signature: _____ Print Name: <u>Jeremy Durham</u> Title: <u>Executive Director</u> Telephone No.: <u>720-564-4610</u> Date: <u>9/9/2021</u>	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)