



Draft Housing Choice Voucher Move to Work MTW Application

Resident Advisory Board Meeting

Date: October 25, 2023

Time: 2:00 pm – 3:00 pm

Location: Kestrel Senior Building, 1st Floor Community Room, 1130 S. Kestrel Lane, Louisville, CO

Public Comment & Hearing Meeting

Date: November 16, 2023

Time: 9:30 am – 10:30 am

Location: Commissioners Hearing Room, Downtown Boulder County Courthouse, 3rd Floor, 1325 Pearl Street, Boulder, or virtually through Zoom by visiting <https://boco.org/BOCC-Notifications>

Draft Housing Choice Voucher (HCV) MTW Application

Boulder County Housing Authority is receiving public comments regarding the proposed HCV MTW Application. A Resident Meeting will be held on October 25, 2023 at 2pm at the Kestrel Senior Building in the 1st Floor Community Room located at 1130 S. Kestrel Lane in Louisville, CO 80027 to receive comments regarding the proposed HCV MTW Application.

Comments may be submitted at the Boulder County Housing & Human Services offices during normal business hours or mailed to BCHA, Attn: Kelly Gonzalez, PO BOX 471 Boulder, CO 80306 or online at <https://boco.org/MTWPlan>

Availability of Information

A copy of the draft HCV MTW Application is available for public review as follows:

- Boulder County Housing & Human Services, 515 Coffman Street, Longmont CO 80504
Monday – Friday, 8:00 am – 4:30 pm
- Boulder County Housing & Human Services, 3460 N. Broadway Street, Boulder CO 80304
Monday, Wednesday, Friday, 8:00 am – 4:30 pm
- Website www.bouldercountyhousing.org

For more information, please contact Kelly Gonzalez, kegonzalez@bouldercounty.gov, (303) 441-4944.

If you are a person with a disability who requires assistance to fully participate in this review process, please call 303-441-3929 press option 1 for English and option 0 to leave a message for the receptionist or email housing@bouldercounty.gov or Colorado Relay at 1-800-659-2656.



Table of Contents

PART I (suggested to be no more than 15 pages and including page numbers).

- MTW Plan (suggested to be no more than 10 pages) – this is a narrative section that responds to Section 5(C)(ii)(a) of this Notice. •
- Administrative Flexibilities Information (suggested to be no more than five pages) – this is a narrative section that responds to Section 5(C)(ii)(b) of this Notice.

PART II (no page limit or page numbers necessary for Appendices 1-3. Appendix 4 suggested to contain no more than 10 pages and includes page numbers).

- Appendix 1: Moving to Work Certifications of Compliance – this must be signed and submitted as described in Section 5(C)(iii)(a) and Attachment I of this Notice.
- Appendix 2: Public Process Documentation – this must be completed and submitted as described in Sections 5(C)(i)(c) and 5(C)(iii)(b) of this Notice.
- Appendix 3: Required Standard Forms – this must include the completed forms described in Section 5(C)(iii)(c) of this Notice.
- Appendix 4: Other Supporting Documentation – the PHA may provide supporting documentation as described in Section 5(C)(iii)(d) of this Notice.

PART I:

Vision for MTW Program:

The Moving to Work Demonstration Program (MTW) allows public housing agencies (PHAs) to design and test innovative, locally designed housing and self-sufficiency strategies for low-income families by permitting PHAs to use assistance received under Sections 8 and 9 of the United States Housing Act of 1937, as amended, 42 U.S.C. 1437, et seq., (1937 Act) more flexibly and by allowing certain exemptions from existing HCV program rules, as approved by the U.S. Department of Housing and Urban Development. The MTW Flexibility II Cohort of the MTW Expansion will assess the overall effects of MTW flexibility on a PHA and the residents it serves, with emphasis on how/whether MTW PHAs seek to achieve administrative efficiencies through MTW. BCHA's vision for the MTW program is to utilize MTW funding and regulatory flexibilities by implementing components from all three statutory objectives of: Cost Effectiveness, Self-Sufficiency, and Housing Choice.

Cost Effectiveness - Reduce cost and achieve greater cost effectiveness in federal expenditures:

- The HA will streamline recertifications by conducting biennial recertifications for elderly, disabled, and households on fixed incomes.
- Minimum rent will be increased from \$50 to \$100. A phase in rent option will not be provided, as participants will be given ample notice before the increase is implemented.
- Participants will self-certify assets up to \$50,000, and bank statements will no longer be required.
- The HA will increase operational efficiency through utilizing information technology (IT) by providing online applications, online recertifications, and the option for virtual briefings.
- The HA will utilize fungibility between HAP and Admin Fees and use HAP and/or Admin Fees for affordable housing and landlord incentives.
- BCHA will be expanding its efforts to streamline the rent calculation and reexamination process.

Self-Sufficiency - Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient:

- BCHA participates in HUD's Family Self Sufficiency Program. As an MTW agency, BCHA will have the financial flexibility and opportunity to create community partnerships and ensure HCV participants are provided supportive services and the means to become self-sufficient. The agency may develop its own recruitment and selection procedures for its MTW FSS Program. FSS participants whose income reaches 30% of FMR will be provided a six-month extension instead of termination. Promoting stability for targeted households with specific needs that may be underserved or not well served by traditional HCV programs.

Increase Housing Choice – increase housing choices for eligible low-income families:

- Extend initial voucher term from 60 days to 120 days due to Boulder's tight rental market.
- BCHA's strategic goal is to contribute 500 permanently affordable units built or acquired by BCHA (within Boulder County, outside Boulder) to a minimum of 500 (total) by year 2024 and land bank three parcels of land for new BCHA affordable housing developments within 5 years for new construction. To meet this goal, we will need to use maximum MTW flexibility. BCHA would like the option to utilize HAP and Admin Fees as gap financing for affordable housing development initiatives to include but not limited to: Redevelopment of the RAD PBV properties and property acquisition; Property acquisition; creative use of Demolition or Disposition Transitional Funding; strategic use of project-based vouchers; and creative partnerships with the private sector as available.

Agency & personnel experience:

BCHA's mission is to provide safe, decent, and sanitary housing conditions for very low-income families and to manage resources efficiently. BCHA promotes personal, economic, and social upward mobility to provide families the opportunity to make the transition from subsidized to non-subsidized housing. BCHA fosters the availability of quality, permanently affordable housing and related services for residents using broad community resources. It strives to accomplish its mission through community collaboration, effective services and programs, professional organization, efficient resource management, and expansion of funding sources.

Boulder County Housing Authority (BCHA) administers programs that address specific needs of a cross-section of County residents. These programs, serve low-income individuals and households, military veterans, homeless households, and families and children involved in the child welfare system. Each of these programs operates under the standard Housing Choice Voucher (HCV) guidelines, helping the participant to afford decent, safe, and sanitary housing in the private housing market. This division also administers housing vouchers through a Project-Based Voucher Program under which the housing assistance is attached to a specific unit, rather than the person.

In 2009 the Boulder County Housing Authority (BCHA) and the Department of Social Services merged to become the Boulder County Department of Housing & Human Services (BCDHHS). The Housing Division of BCDHHS (the division in which the BCHA resides) helps foster the availability of quality, affordable housing, and related services for lower income residents. Housing stability is a critical safety net pillar and one that is closely connected to outcomes in areas such as health and well-being, education, and safety.

BCDHHS embraces the following core values:

- Investing in community partnerships and addressing the root causes of vulnerability and instability for those we serve.
- We believe that healthy communities are created by working with others outside of HHS to create long-lasting solutions to complex health and social challenges.
- We leverage the Social Determinants of Health to ensure safe and stable housing, education and skill building, employment and income stability, access to health care, food security, and safe and stable families.
- Prevention, early intervention, and family preservation are at the forefront of our work to strengthen individuals, families, and communities.
- Our focus is on getting services to those in need as early as possible to avoid more difficult and costly crises down the line.
- Our system-wide model of care includes shared assessments and the use of technology to reduce duplication and enhance the delivery of progressive solutions for our community services are accessible, high-quality, and aligned with consumer and family strengths.
- We adopt evidenced informed practice models to ensure excellence in service delivery.
- We promote an interactive, centralized data system and knowledge base, accessible to clients, community partners and staff to ensure easy access to service and to coordinate care.
- We are innovative in our programs and services to ensure we meet community needs.
- Services and supports are delivered in a fiscally responsible and cost-effective manner.

Susana Lopez Baker, Housing Deputy Director/Interim Executive Director - Susana previously served as the Chief Officer of Internal and External Services at the Brighton Housing Authority. Over the past 10 years, Susana has developed deep collaborative partnerships across the Adams and Boulder County community through her work as the Director of Community Engagement and Equity with the YWCA of Boulder County and work with Thrive and Prairie View High School Advisory board. Susana is also the CASA Board of Directors President for Boulder County Voices for Children. Susana is a 2020 Civico Leadership Fellows Graduate, holds a degree from Adams State University in Sociology and a master's degree from Valparaiso University in Human Behaviors. Susana brings a strategic change management leadership lens, has experience leading a continuum of programs that serve the unhoused community through to home ownership, and a proven track record of managing and collaborating with multiple partners and stakeholders.

Amanda Guthrie, Director of Housing Operations— Amanda is responsible for the management of BCHA's Housing Choice Voucher program, Property Management portfolio (908 rental homes) and all compliance activities. Under Amanda's leadership, BCHA has doubled the housing portfolio under property management and has grown the housing voucher portfolio to serve more households. Amanda also oversaw the creation of a fair housing, and reasonable accommodations and compliance team to focus solely on increasing housing equity and program compliance. She oversaw expansion of BCHA's housing continuum with the Family Unification Program to reduce institutionalization of youth, Short Term Housing and Safe House Progressive Alliance to support people in crisis and prevent domestic violence, and she is responsible for creating new deeply affordable housing units for veterans and people with disabilities. Amanda holds a bachelor's degree in psychology from the University of Colorado @ Boulder a master's degree in clinical Mental Health from the University of Colorado at Denver. Amanda is a licensed Professional Counselor.

Kelly Gonzalez, Housing Choice Voucher Program Manager: Kelly has been employed with Boulder County Housing & Human Services since 2007 working directly with the Housing Authority in a variety of roles. Kelly started as an administrative assistant, transitioned to Program Assistant for the Housing Stabilization Program. In 2014 Kelly transitioned into the role of Housing Eligibility Specialist administering BCHA's subsidized Housing Waitlists including screening applicants for rental suitability and processing income and eligibility calculations. In 2016 she was promoted into her current role as the Housing Choice Voucher Program Manager and is responsible for the oversight of a \$13 million dollar budget. Kelly has grant writing experience and since 2016 has applied for several HUD funding opportunities to increase BCHA's HCV program from an ACC contract of 834 vouchers and 736 vouchers under lease agreements with an annual budget authority of \$8,045,515 in 2017 to an ACC contract of 951 traditional and special purpose vouchers plus 34 EHV vouchers with 974 households under lease agreements and an annual budget authority of \$12,947,591. Kelly holds many training certifications, including but not limited to: Housing Choice Voucher Financial for Non-Financial Managers, NAHRO Certified Specialist of Inspection – Housing Quality Standards (CSI-HQS), NAHRO Certified Housing Choice Voucher Eligibility, Income and Rent Calculation, Nan McKay Certificate in Developing and Managing Project-Based Vouchers.

Melissa Razo, Housing Programs Occupancy Supervisor: Melissa has been employed with Boulder County Housing and Human Services since 2018. Melissa started with BCHA as a Housing Case Manager working with our Housing Choice Vouchers and the Family Unification Program (FUP and FUPY) -Holding briefings, determining eligibility, processing Annual and Interim Recertification, conducting audits, and

adjustment reviews. Prior to this, Melissa worked for Aspen Family Services, a contracted entity for the Child Care Assistance Program for Adams, Boulder, Denver, and Jefferson County for the Colorado Child Care Assistance Program for over 10 years as a Case Manager. In 2022, Melissa transitioned with BCHA into the role as Housing Programs Occupancy Supervisor, managing 6 Housing Case Managers who work with a multitude of Voucher Programs -Housing Choice Vouchers, Mainstream, Emergency Housing Vouchers (EHV), Project Based Voucher (PBV), Non-Elderly Disabled Voucher (NED), Disaster Relief Vouchers, HUD Veterans Affairs Supportive Housing Vouchers (HUD-VASH), Family Unification Program (FUP), Homeless Set Aside and Homeless Family Admission Vouchers. Melissa sits on the Housing Resource Panel for review of eligibility for the Family Unification Program. Tracks all Housing Quality Standards Inspections to ensure all units have been scheduled and have provided necessary documentation to meet the minimum standards of Health and Safety. Monthly HUD Reporting on usage of current vouchers. Melissa Holds Certificates in Housing Choice Voucher (HCV) Financials for Non-Financial Manager, Understanding HUD's Two-Year Tool, and Boulder County Supervisory Certificate.

Compliance Team: BCHA established an internal Compliance team in February of 2019 in response to the increasing growth and complexity of the BCHA rental and voucher portfolio. Prior to the establishment of the Compliance team, compliance activities were handled by individual teams (Property Management, Housing Choice Vouchers, Maintenance) with guidance from their supervisors. Under the previous model, the compliance activities were addressed either 1) in response to requests for audits or 2) to correct deficiencies and lacked a systematic approach to mitigating risk and protecting BCHA's valuable housing assets. Over the past 2 years, the Compliance team has prioritized and focused its efforts on building systems and structure for BCHA's voucher program, property management portfolio comprised of Low-Income Housing Tax Credits, affordable units, HUD Multi-family, Rural Development and HOME programs.

Commitment to Fair Housing and Civil Rights Goals:

BCHA certifies it will carry out MTW activities in compliance with Title VI of the Civil Rights Act of 1964; the Fair Housing Act; Section 504 of the Rehabilitation Act of 1973; Title II of the ADA Act of 1990; all regulations implementing these authorities; other applicable Federal, State, and local civil rights laws; and it will affirmatively further fair housing including: (1) take meaningful actions to further the goals identified by the Assessment of Fair Housing conducted in accordance with 24 CFR 5.150-5.180 and 903.15; (2) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (3) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d).

BCHA is committed to Affirmatively Furthering Fair Housing (AFFH) and is taking meaningful actions to adjust current plan documents to further efforts to combat discrimination and overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. BCHA is actively working on modifying the current Fair Housing Plan to identify meaningful actions tied to goals that can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity. BCHA will continue to analyze historic and current barriers to equal opportunity (the fair housing landscape) in Boulder County's jurisdiction and set goals to overcome those barriers and ensure fair housing choice for individuals with protected characteristics, including race, color, national origin, religion, sex, including sexual orientation and

gender identity, familial status, and disability. BCHA has committed to ensuring all staff receive ongoing training in the areas of Fair Housing. BCHA partners with the Colorado Housing and Finance Authority (CHFA) to administer trainings staff can register for on demand trainings in basic and advanced Fair Housing, Reasonable Accommodations, Assistance Animals, HUD Section 504 Requirements, VAWA and Limited English Proficiency Plans.

On February 27, 2020, BCHA partnered with CHFA to provide training in the areas of fair housing and reasonable accommodation/modification, to increase staff knowledge to help ensure continued inclusion and compliance. Due to COVID-19 large in person trainings were suspended during 2021. On November 3, 2022, BCHA held an in-person Fair Housing training for staff hosted by CHFA which included 100 program staff from different departments including the voucher program, property management, maintenance, compliance, resident services, administration, and attorneys. Additionally, basic Fair Housing trainings are available to all staff through our contract with Tschetter Sulzer, P.C. and online with CHFA as well.

BCHA has identified the following goals in its 2024 annual plan towards affirmatively furthering fair housing efforts:

- Goal 1: Adjust to market conditions. BCHA will evaluate marketing efforts by comparing the self-reported race and ethnicity applicant and tenant data with the local census information to ensure that pool of applicants and tenants accurately represents the populations that reside in Boulder County. BCHA will then adjust marketing efforts as needed to ensure additional marketing occurs for any underrepresented groups. Evaluations will be made to see if the outreach efforts are sufficient of, if marketing activities need to be modified to attract the group(s) least likely to apply.
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- Goal 2: Require staff training. BCHA receives instruction on the AFHMP and the Fair Housing Act from investors, including our HUD Fair Housing and Equal Opportunity representative at least every few years. Our goal is to offer a Fair Housing training to all staff annually either in person or via a webinar.
- Goal 3: Continue to partner with area agencies that serve diverse groups of residents within and surrounding Boulder County. BCHA, under the County's Department of Housing and Human Services, has good working relationships with several community organizations serving varied groups of residents, and distributes information regarding program and property opportunities to this group of more than 50 organizations and 4500 recipients.

BCHA has a robust Section 504 Reasonable Accommodation (RA) Committee made up of at least five employees meeting twice monthly or on an ad-hoc basis as needed to review Reasonable Accommodation and unit modification requests submitted by BCHA tenants, voucher holders or applicants. The Committee seeks to include employees with diverse subject matter expertise.

Plan for Future Community Engagement:

BCHA has conducted regular outreach efforts to increase participation in the Resident Advisory Board. BCHA utilizes our Limited English Proficiency plan to determine the language needs for this jurisdiction and employs in-house interpretation services or contracts with outside translation companies as needed to ensure documents and messaging is appropriately conveyed. During the 2024 annual plan revision

process BCHA used multiple marketing efforts to connect with over 900 voucher holders and 900 BCHA tenants. As a result of those outreach efforts, 82 residents requested to be placed on a list to participate in RAB meetings. The first RAB meeting of 2023 had 10 attendees attended in person. An additional RAB meeting is scheduled for October 25 to review the draft MTW plan and the public hearing is scheduled for November 16. If accepted into the MTW cohort, BCHA will schedule additional public meetings throughout 2024 to help refine and design the MTW flexibilities.

BCHA employs a variety of different methods to connect with the public including but not limited to social media contacts, direct emails, text messages, local publications in news outlets, partnerships with local resource organizations including groups centered on diversity and inclusion, our website and direct mailings to tenants and voucher holders. BCHA maintains an affirmative fair housing marketing outreach list with 42 local agencies that specifically offer services and resources to racial and ethnic minorities, individuals with limited language proficiency, persons with disabilities, and families with children.

PHA Operating and Inventory Information:

BCHA has a variety of voucher programs that serves our diverse population of households throughout Boulder County. BCHA has adopted the following local preferences to target the most vulnerable populations in the community. Applicants for the voucher programs will receive preferences if the head of household or spouse is elderly aged 62 and older, the head of household or spouse is an individual with disabilities, or the household contains children under the age of 18. The household must also qualify as a very low-income family at time of admission. BCHA does not have any local residency requirements for the voucher program. This was adjusted in response to the number of households who had been priced out of their community (moving to lower rent communities) to return to Boulder County. BCHA administers several special purposes voucher programs (listed below), eligibility and preferences for those may vary slightly based on the applicable regulations. BCHA does not anticipate any major changes in the demographics of the household groups served and will continue to serve our diverse demographic by helping participants to afford decent, safe, and sanitary housing.

- Housing Choice Vouchers
- Project Based Vouchers
- Family Self Sufficiency
- Mainstream Vouchers
- Non-Elderly Disabled Vouchers (NED)
- Disaster Relief Vouchers
- Emergency Housing Vouchers
- The HUD-Veterans Affairs Supportive Housing (HUD-VASH) Program
- Family Unification Program (FUP)
- Homeless Set Aside & Homeless Admissions Vouchers

BCHA does not anticipate any major plan changes to its current housing stock as a result of its participation in the MTW demonstration program. BCHA plans to utilize flexibilities to increase its PBV cap and selection processes and may use MTW flexibilities towards acquisition of future affordable housing developments and disposition of any development in order to streamline operations and improve the economy of scale for service delivery as well as any smaller developments requiring extensive capital needs.

BCHA has been proactive in our efforts to help reduce the challenges and barriers that households have faced in leasing. We have our Housing Helpline to answer immediate questions, Deposit Assistance for Households to secure a unit, A Landlord Liaison to help provide current and up to date Vacancy Lists weekly that we share with Voucher Searching households, Housing Stabilization Program to help households with unforeseen circumstances-outstanding rent and utilities, Resident Services to help tenants keep their voucher if they are on the verge of termination.

BCHA has currently demonstrated innovation and creativity within our current program in the creation of Damage Mitigation funds to help with remediation costs for units contaminated with methamphetamine, Landlord Assurance Funds to help act as a safety net for landlords to help recover excessive damages beyond security deposits up to \$5000.

Plan for Local MTW Program:

BCHA intends to implement the following types of initiatives in its local MTW program:

- Tenant rent policies: Alternative Utility Allowance
- Tenant Rent policies: Elimination of Deductions
- Re-examinations: Alternative Reexamination Schedule for households
- Reexaminations – Self certification of assets
- Housing Quality Standards – Alternative Inspection Schedules
- PBV flexibilities: elimination of PBV selection process for PHA owned projects without improvement, development, or replacement
- PBV flexibilities: Alternative PBV selection process

BCHA seeks to utilize MTW flexibility in its community to address local needs by collaborating with our current partnerships and community members to develop policies that address the three statutory objectives of the MTW Demonstration program in the areas of cost effectiveness, self-sufficiency, and housing choice.

BCHA requests authority and approval to utilize HCV funds flexibly in accordance with approved MTW activities.

BCHA would utilize funds in a flexible manner to continue funding essential activities to support residents in housing navigation, deposit assistance, landlord recruitment and in accordance with the MTW statutory objectives of cost efficiency, self-sufficiency, and housing choice.

Evidence of Partnerships:

Boulder County Housing Authority was established on February 5, 1975. On January 14, 2003, BCHA passed a resolution to have the Board of Boulder County Commissioners sit as the BCHA housing board. In 2009 the Boulder County Housing Authority (BCHA) and the Department of Social Services merged to become the Boulder County Department of Housing & Human Services (BCDHHS). This was a strategic decision which has at its heart the idea that the integration of services, programs and staff expertise is critical to helping ensure that people get the full range of help they need in a barrier-free, efficient, and welcoming way. BCDHHS's mission is to build a healthy, connected community that empowers people and strengthens families by confronting the root causes of crisis and instability.

BCHA's merger with BCDHHS has created opportunity for greater access to services and resources. BCHA and BCDHHS work collaboratively to support the residents of Boulder County. The following are examples of systems and services that are provided through BCDHHS and its community partnerships.

- Community Housing Resource Panel (CHRP): meets every two weeks to identify and award resources for eligible participants. Included in the panel are members of the child protection and youth teams in the Family and Children Services Division, the Housing Division/BCHA, and representatives from various community-based organizations, including our domestic violence shelters and homeless youth shelter (TGTHR). In addition to making award determinations, the panel coordinates the administration of the FUP vouchers.
- Housing Navigation Services: Boulder County employs a dedicated landlord specialist to assist local landlords with issues regarding voucher programs and offers application assistance, information regarding property inspections, voucher payment questions or concerns, lease compliance issues, double deposits to overcome screening barriers such as low or no credit score or inconsistent rental history, holdover fee to secure a unit, sign on bonus and access to landlord mitigation funds for in the event that a voucher holder vacates the property and does damage exceeding the security deposit up to \$5,000. This specialist builds relationships with landlords and publishes a weekly vacancy report to all voucher program case managers to assist voucher holders searching for units. When developing a new relationship with a landlord, the specialist orients landlords to the HCV program. This orientation and the established relationship with the specialist help to recruit and retain landlords. This program is beginning to show positive impacts. The implementation of Family Housing Navigation services has been successful, even in Boulder County's tight rental market. The family housing navigators work closely with the landlord specialist to share and build their network of local landlords.
- Personal Finance Program: Provides counseling and education to clients in the areas of personal finance to help them build skills and increase their knowledge capacity in their move toward self-sufficiency. Workshops, classes, and one on one appointments are available to residents of Boulder County. In 2022, Boulder County's Personal Finance Program & Community Education, served 869 households through their individual counseling appointments focusing on personal finance goals, financial well-being, credit improvement, debt reduction, homeownership counseling and student loan debt navigation. There have been 238 households in attendance at workshops focused on personal finance goals, financial well-being, credit improvement, debt reduction, homeownership counseling and student loan debt navigation.
- Lease Requirements and Compliance: BCHA created a good tenancy video to help educate households about their responsibilities as a tenant entering into a lease agreement. The video provides information about how to be a good neighbor, the importance of making rental payments on time, notifying landlords of any necessary repairs or concerns quickly, respecting quiet community spaces and responding to concerns or complaints. It also provides guidance regarding good housekeeping practices, and how to proactively communicate with their landlord.
- Community Support: The Community Support division administers benefits and determines eligibility and renewals for basic needs and financial support programs: Health First Colorado which includes Colorado's Medicaid Programs and general health coverage, Medicare Savings Program, Food Assistance, Colorado Works (Temporary Assistance for Needy Families & Work Supports), Child Care Assistance, Adult Financial Programs (Old Age Pension & Aid to Need and Disabled), Long Term Care and Burial Assistance.

- Deposit Assistance: The locally funded Boulder County Housing Stabilization Program has designated funds specifically for voucher program participants. This assistance includes security deposits (up to two times the base rent amount or the current market standard for deposit), and utility deposits with a lifetime maximum of two deposits. The Housing Stabilization Program designates funding for this program on an annual basis.
- Family Resource Networks (FRN): BCDHHS works closely with its local family resource networks, which includes Sister Carmen Community Center, OUR Center, and Emergency Family Assistance Association. FRNs provide basic needs assistance and works to improve the self-reliance outcomes of families and the social, emotional, and academic outcomes of children and youth in Boulder. Emergency Family Assistance Association provides food assistance/food bank, financial assistance for utilities, rent or mortgage, health services, and much more for Boulder and the southern mountains. The OUR Center provides a food pantry, hot breakfasts and lunches, housing, and rental assistance, basic health services, and more for residents of the St. Vrain Valley School District, including the northern mountains. Sister Carmen Community Center provides food assistance/food bank, financial assistance for utilities, rent or mortgage, health, and transportation services, and much more for Lafayette, Louisville, Superior, and Erie.
- Boulder County Regional Housing Partnership: which BCHA is a member of as a cross-jurisdictional working group to address escalating housing costs across Boulder County. The Partnership spearheaded the development of a new regional housing plan that aims to triple the amount of affordable housing in the region over the next fifteen years. Ten jurisdictions have now signed on to the strategy, committing to increasing their own stock of affordable housing in order to achieve the collective goal of 18,000 affordable homes preserved or developed by 2035. The Partnership also launched a new website, Home Wanted, to promote the plan and raise awareness about the region's affordable housing challenges.
- Homeless Solutions for Boulder County (HSBC): an innovative approach to homelessness that includes multiple government entities including Boulder County, Boulder County Housing Authority, Boulder Housing Partners, Longmont Housing Authority and the Cities of Boulder and Longmont, and nonprofit organizations working to impact homelessness, as well as additional external partners. This regional integrated service system combines a coordinated entry process with the provision of timely and appropriate supportive and housing services to assist people in moving out of homelessness and into housing in the most efficient ways possible.
- Continuum of Care: Metro Denver Homeless Initiative (MDHI) is the Regional HUD Continuum of Care covering the Denver Metro seven county region, including Boulder County. MDHI's mission is leading and advancing collaboration to end homelessness in the Denver Metro Region, and its vision is dedicated to everyone in the Metro region having a safe stable place to call home. BCDHHS and MDHI have a longstanding relationship of collaboration and coordination and are aligned in addressing homelessness in our community. BCDHHS has been a member with the MDHI CoC for approximately the last 10 years, and the two organizations have worked closely to design a coordinated entry system for Boulder County's homeless adults. Both organizations also work together in carrying out the CoC's coordinated entry system, called OneHome, which is a collaboration between many agencies to create coordinated housing solutions for people experiencing homelessness. OneHome is dedicated to identifying permanent housing for homeless individuals, families, and transition-age youth.

Organizations that DHHS routinely refers families to include but are not limited to:

- Mental Health Partners (community behavioral health provider)
- Boulder County Public Health (Nurse Family Partnership, Teen Parenting & other public health services)
- Boulder County Community Services
- Center for People with Disabilities
- Emergency Family Assistance Association
- Sister Carmen Community Center (family resource center)
- Community Food Share
- Outreach United Resource Center (OUR Center)
- Head Start Child Care Providers
- Private Therapists
- El Comite' (Services for the Hispanic/Latino Community)
- Workforce Center (employment services)
- The Federally Qualified Community Health Centers (Clinica & Salud)
- Dental Aid
- The Domestic Violence Support Centers & Shelters (SPAN & Safe Shelter)

Additionally, BCDHHS has a 25+ year collaborative relationship with the Boulder County agencies that serve our highest risk children, youth and families through the multidisciplinary group Integrated Managed Partnership for Adolescent and Child Community Treatment (IMPACT). IMPACT's main goal is to ensure that families have access to all the services and resources that they need across the partnership. The initiative has focused on improving access for families, reducing duplication, and filling in gaps and ensuring high quality services. This has resulted in a rich continuum of services and resources for families.

The partnerships will help BCHA achieve the vision of BCHA's proposed MTW program through collaboration and review of proposed plan activities. The partnerships will continue to support residents in locating and remaining stably housed in a community in which the housing costs have escalated significantly in the past 5 years. BCHA will continue to leverage existing resources and partnerships to avoid duplication of services and streamlined service delivery. BCHA intends to leverage funding and or other in-kind resources in the implementation of its local MTW program through continuing to utilize community partnerships, and family resource centers to support residents. BCHA will continue to utilize established systems and services offered in partnership with DHHS including but not limited to housing resource panel, deposit assistance, personal finance program, family resource centers, access to public assistance and affordable housing options.

Administrative Efficiencies Information

Assessment of Past and Existing Efforts to Achieve Administrative Efficiencies:

As a non-MTW agency BCHA has attempted to create additional flexibilities (examples include expanding housing choice for voucher holders, increasing landlord engagement and recruitment) within the existing voucher program rules and regulations by leveraging and maximizing current county and community partnerships.

The voucher team has access to Boulder County's Housing Stabilization Program which provides deposit assistance to voucher holders (up to 2 times), utility deposits, and up to 6 months of arrears payments (if the arrears is preventing households the ability to lease up).

Boulder County has partnered with Boulder County Housing Authority, Boulder Housing Partners, City of Boulder, City of Longmont, Longmont Housing Authority, Mental Health Partners to create a Landlord Assurance fund which helps landlords recoup damage costs for rental assistance supported tenants. The fund acts as a "safety net" for the first three years of tenancy for all landlords who accept federal, state, and local Boulder County housing vouchers and other types of rental assistance and will provide up to \$5,000 or reimbursement for eligible damage caused to the unit during the households' tenancy.

BCHA completes regular reviews the HCV administrative plan to make policy modifications to improve efficiencies and eliminate administrative burden. Over the past several years BCHA has modified policies related to the collection of asset documentation and threshold for reporting changes to provide additional flexibilities for households.

The BCHA HCV program manager (in partnership with the Boulder County landlord liaison) tracked the rental rates from December 2022 through March of 2023 and observed the cost of rent and utilities for 1, 2, and 3 bedrooms was averaging at \$1779, \$2073, and \$2722. These rental amounts exceeded the HUD FMRs by 7-12% and BCHA's 2023 payment standards by 2-7%. Combined with rising utility costs, along with increased rents resulted in a reduction of the amount voucher holders could spend on rent, which made less rentals available to the voucher population. BCHA also observed an increase in the amount of time spent searching for units - 51.72% of voucher holders were taking 120 days or longer to lease up. BCHA also noted an increase in the amount of reasonable accommodation requests for exception payment standards. In response, BCHA proposed a mid-year increase to the payment standards for the 1-, 2- and 3-bedroom amounts taking them up to 110% of the HUD FMRs. This change was approved by the Boulder County Commissioners and went into effect May 1, 2023.

Additionally, BCHA requested and received HUD approval to implement waiver activities under PIH Notice 2022-30. BCHA requested the option to waive 982.505(c)(4) to permit the PHA to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination. This allowed households who were rent burdened to receive immediate relief. In early 2023, 19.8% of BCHA's households were paying 31% or more of their income towards rent and utilities. By adopting both the higher payment standard and the HUD waiver BCHA anticipates seeing the number of rent burdened households decrease to 8% by the end of 2023.

Assessment of Needed Administrative Efficiencies:

- **Tenant rent policies: Alternative Utility Allowance**
 - BCHA proposes to calculate a flat utility allowance schedule based on bedroom size in lieu of the current structure that is based upon bedroom size, utility type, structure type and utility amenities. Establishing a flat utility allowance schedule will eliminate administrative burden in calculating correct figures and ease the burden on the households for understanding how utilities will affect the maximum contract rent they can search for and will reduce the risk of potential audit findings for miscalculation of the utility allowance. If a household needs a higher utility allowance due to a disability, the household can submit a Reasonable Accommodation request. BCHA currently spends \$2684 annually to review and adjust utility allowance studies.

- This MTW activity serves the following statutory objectives: cost effectiveness; self-sufficiency and housing choice. This MTW has the following cost implications increased revenue; decreased expenditures.
- BCHA also proposes to eliminate utility reimbursement payments. This activity's main objective is to ensure that all residents and participants are contributing towards their rental payment (or at a minimum to ensure that participants are not receiving payment to live on housing assistance), and to increase efficiency. BCHA currently has 127 households receiving utility reimbursement payments. The average amount of the reimbursement payments is \$97, and 49 of those households are receiving utility reimbursements between \$1-\$50. In BCHA's plans to establish a flat utility allowance BCHA will also account for reimbursement payments. BCHA experiences administrative burden due to issuing reimbursement payments due to reimbursements checks not being cashed by the participant. BCHA's current process is to: issue a check, mail it to the participant and ongoing tracking and monitoring of payments to ensure checks are cashed timely. If the checks are not cashed within 180 days of issuing payments, the check must be voided, or a stop payment placed (costing \$25 per check) and then it must be re-issued which is costly and time consuming. The checks that are not cashed are often small dollar amounts (less than \$50). Additionally, this puts a burden on households receiving smaller reimbursement payments to get the checks cashed and can result in fees to cash the checks for households without bank accounts.
 - This MTW activity serves the following statutory objectives: cost effectiveness; self-sufficiency. This MTW has the following cost implications increased revenue; decreased expenditures.
- **Tenant Rent policies: Elimination of Deductions**
 - BCHA may eliminate one, some, or all deductions; BCHA may replace existing standard deduction(s) with a single standard deduction(s) changing from a 30% of rent with deductions to a 26.5% of rent with no deductions for elderly and disabled households, and households with minor children. BCHA may establish alternative policies to include or exclude certain forms of participant income during the income review and rent calculation process, which will increase tenants' savings.
 - This MTW activity serves the following statutory objectives: cost effectiveness; self-sufficiency, This MTW has the following cost implications increased revenue; decreased expenditures.
- **Re-examinations: Alternative Reexamination Schedule for households**
 - BCHA plans to implement biennial recertifications for elderly, disabled, and fixed income households resulting in a reduction of staff collecting, verifying, and processing data. Streamlined recertifications will also save participants time and cost regarding complying with the annual recertification documentation requirements.
 - This MTW activity serves the following statutory objectives: cost effectiveness; Self-sufficiency, This MTW has the following cost implications increased revenue; decreased expenditures.
- **Reexaminations – Self certification of assets**
 - Households self-certify assets received up to \$50,000. This change will decrease the reporting burden on households by no longer requesting bank statements or verifying stocks and bonds totaling \$50,000 or less. This change will also significantly reduce BCHA's staff administrative

burden in collecting and processing data and eliminating the participant from having to pay bank charges for bank statements. The waiver will improve cost effectiveness in our effort to reduce administrative burden while still maintaining the integrity of the rent calculation process.

- This MTW activity serves the following statutory objectives: cost effectiveness and this MTW activity has the following cost implications: decreased expenditures.

- **Housing Quality Standards – Alternative Inspection Schedules**

- BCHA proposes to implement an alternative inspection schedule to generate administrative cost savings. In year one all units that passed their annual/initial inspections from the prior year will be marked as biennial and all units that failed will stay on an annual inspection rotation. BCHA currently employs a third-party inspection company to perform inspection services. In 2022 BCHA performed 1712 total inspections and 946 of those were annual inspections. Any initial and annual inspection that passed in 2023 would not receive another inspection until 2025. Based off our 2022 inspection data we anticipate that this could result in a savings of up to \$32,272 or 35% of our total contract costs.

- This MTW activity serves the following statutory objectives: cost effectiveness and this MTW activity has the following cost implications: decreased expenditures.

- **PBV flexibilities: elimination of PBV selection process for PHA owned projects without improvement, development or replacement PBV flexibilities: Alternative PBV selection process**

- Project-Based Voucher Program Flexibilities: A range of possible activities in the project-based voucher (PBV) program. BCHA may increase the number of authorized units that it project bases; raise the PBV cap within a project up to 100 percent; eliminate the selection process in the award of PBVs to properties owned by BCHA without engaging in an initiative to improve, develop, or replace a public housing property or site; use HUD's standard rider to the HAP contract that reflects any MTW authorizations; establish an alternative competitive process in the award of PBVs that are owned by non-profit, for-profit housing entities, or by BCHA; increase the term length of a PBV HAP Contract; and/or develop an internal local process to determine the initial and re-determined rent to owner, and/or allow for BCHA staff to inspect PHA owned units. BCHA currently spends \$250 an hour on a third-party entity for all reviews associated with selection process, RFP solicitation and contract rent adjustments and HAP contract renewals. BCHA may also reduce the public noticing timeline as needed.

- This MTW activity serves the following statutory objectives: cost effectiveness and this MTW activity has the following cost implications: decreased expenditures.