

PHA Name : Boulder County Housing Authority

PHA Code : CO061

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2026

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs II

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Boulder County Housing Authority (BCHA) based in Boulder, Colorado and serves all areas of Boulder County outside the city limits of Longmont and Boulder, including the cities of Lafayette and Louisville, and the towns of Superior, Nederland, and Erie, and all unincorporated areas of the county BCHA has an intergovernmental agreement to also allow current voucher holders to reside within Broomfield County limits. BCHA's mission is to foster the availability of quality, affordable housing and related housing services for the residents of Boulder County.

Our goal is to provide quality, affordable housing and related services to Boulder County residents. We also work with the cities of Boulder and Longmont to increase the availability of affordable homes.

In March 2024, thanks to our past record and high-performance status BCHA was chosen as a HUD Moving to Work (MTW) agency under the Flexibilities for Smaller PHAs Cohort II group, which gives us more flexibility to make cost-saving and policy changes. This is our first MTW plan, focusing on short-term goals for Year One. We are also planning long-term goals to better serve our community and improve residents' lives.

As we do this planning, we make sure that any of our proposed activities accomplish at least one of the three statutory objectives established by Congress when it created MTW in 1996:

1. Reduce cost and achieve greater cost effectiveness in Federal expenditures;
2. Give incentives to families with children where the head of household is working, is 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; and
3. Increase housing choices for low-income families.

We had initially planned during our first year as an MTW agency in 2025 to focus on making changes primarily to internal administrative policies on how we handle utility allowances, medical deductions, and our project-based voucher program. We will also make some internal staff changes to work more efficiently. We had planned to conduct a survey during Year One to understand our residents' needs better, which would help us adjust our plans for Year Two.

In 2025 we were able to implement administrative policy changes related to our project based voucher program, however due to the pending HOTMA changes and software system compliance we were unable to begin our proposed activities related to medical deductions. Our plan for 2026 includes a software conversion to a system that would be able to perform the actions we would like to implement in regards to streamlined tenant rent calculations. This will be delayed until the new software is in place, we anticipate a start date of January 2027 for these changes. In 2026 we will continue the previously approved activities related to the administration of our project-based vouchers we will also implement the activity related to streamlined utility allowance calculations and further explore cost saving measures related to annual inspections and look at bring all inspections on BCHA owned properties in-house. We will also continue with our biennial inspections and review how the methods in which we connect with households for recertification.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Was Discontinued in a previous Submission Year
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Plan to Implement in the Submission Year
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Currently Implementing
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
d. Alternative PBV Selection Process (HCV)	Currently Implementing
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Plan to Implement in the Submission Year
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

C. MTW Activities Plan that Boulder County Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative Description: This activity will be postponed until 2027. At reexamination, BCHA will no longer require elderly/disabled households to submit any unreimbursed medical expenses and instead will calculate the TTP at 26% of the monthly income while applying the applicable utility allowance. Agency goals for MTW Activity: Decrease administrative time required to follow up and secure documents, allowing staff to focus on other priorities. This waiver supports BCHA's larger goal of using MTW flexibility to streamline administrative processes and in the longer term reduce agency costs.
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. Due to software constraints we were unable to implement this activity in 2025 as previously planned, a software transition is occurring in 2026 so the new estimated start date for this activity is 2027
Please provide an explanation as to why the activity was discontinued or will be discontinued. Due to software constraints we were unable to implement this activity in 2025 as previously planned, a software transition is occurring in 2026 so the new estimated start date for this activity is 2027
Does this MTW activity require a hardship policy? Provided Already
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? Yes
What is the status of the Safe Harbor Waiver request? The waiver was previously approved.
Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.
Does the MTW activity require an impact analysis? Yes This document is attached.
Does the impact analysis apply to more than this MTW activity? No
What percentage of income will equal the Total Tenant Payment (TTP)?

26.00%

What is the income basis for calculating Total Tenant Payment?

This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)

1.r. and/or 1.s. "elimination of deductions"

1.j. - Alternative Utility Allowance (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

gas/electric/propane etc. and building type and instead offering one flat amount for when the household is responsible for paying all utilities based on bedroom size. And then a second utility allowance schedule for when the household is required to pay some but not all utilities, which as well will eliminate all of the different categories and building types and offer one flat amount based on bedroom size.

This MTW activity applies to all family types.

This MTW activity applies to all tenant-based units and applies to all properties with project-based vouchers

This MTW activity applies to all family types.

This MTW activity applies to all tenant-based units and applies to all properties with project-based vouchers

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This was approved in 2025 however not implemented but will be implemented January 1 2026.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.

Our third-party service is currently evaluating the utility allowance schedules. By eliminating all the different categories of gas/electric/propane etc. and building type and instead offering one flat amount for when the household is responsible for paying all utilities based on bedroom size. And then a second utility allowance schedule for when the household is required to pay some but not all utilities, which as well will eliminate all of the different categories and building types and offer one flat amount based on bedroom size.

2.c. - Rent Reasonableness – Process (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

BCHA has used its MTW flexibility to eliminate the requirement for a third party to conduct rent reasonableness on BCHA-owned or BCHA-controlled units assisted with project-based vouchers. BCHA has implemented this activity within the safe harbor limits established by the MTW Operations including the following: (1) BCHA has established and made available a quality assurance method to ensure impartiality; (2) BCHA has made available the method used to determine

that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area; and (3) As needed and by request, BCHA will obtain services of a third-party entity to determine rent reasonableness for BCHA-owned units.

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. PBV units that BCHA owns, manages and/or controls. original rent reasonableness determination). The sample size is consistent with the SEMAP sampling protocol as defined in 24 CFR 985.2.

No document attached.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method.

BCHA has used its MTW flexibility to eliminate the requirement for a third party to conduct rent reasonableness on BCHA-owned or BCHA-controlled units assisted with project-based vouchers. BCHA has implemented this activity within the safe harbor limits established by the MTW Operations including the following: (1) BCHA has established and made available a quality assurance method to ensure impartiality; (2) BCHA has made available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area; and (3) As needed and by request, BCHA will obtain services of a third-party entity to determine rent

reasonableness for BCHA-owned units.

2.d. - Rent Reasonableness – Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

BCHA has used its MTW flexibility to eliminate the requirement for a third party to conduct rent reasonableness on BCHA-owned or BCHA-controlled units assisted with project-based vouchers. BCHA has implemented this activity within the safe harbor limits established by the MTW Operations including the following: (1) BCHA has established and made available a quality assurance method to ensure impartiality; (2) BCHA has made available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area; and (3) As needed and by request, BCHA will obtain services of a third-party entity to determine rent

reasonableness for BCHA-owned units.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

Nothing has changed

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please explain or upload a description of the quality assurance method.

This document is attached.

Please explain or upload a description of the rent reasonableness determination method.

We still use a software service by a third party vendor however we now allow staff to use this software on our own units.

This document is attached.

5.c. - Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

BCHA will explore performing Housing Quality Standards (HQS), or NSPIRE when implemented, inspections on all units that it owns, manages, and/or controls. BCHA will establish and make available a quality assurance method to ensure an objective analysis, and at the department's request, the agency will obtain the services of a third-party entity to determine if a BCHA owned unit passes HQS or NSPIRE. HQS or NSPIRE inspection standards will not be altered from the guidance found at 24 CFR 982.401. The participant will be able to request an interim inspection at any time.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This waiver may be implemented for the project-based program in 2026. Implementation of this waiver for all tenant based vouchers could later be planned for 2026. Cost savings and time savings for the project-based program will be evaluated at the end of 2025.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please explain or upload the description of the quality assurance method:

Following will explain the quality assurance method

BCHA alternative inspector will re-inspect a sample of units for quality control of HQS inspections in accordance with 24 CFR 982.405(b) and 24 CFR 985.2. The agency shall establish and make available a quality assurance method to ensure an objective analysis.

ii. The participant must be able to request an interim inspection.

iii. HQS/NSPIRE inspection standards must not be altered as found at 24 CFR982.401.

iv. At the Department's request, the agency must obtain the services of a third-party entity to determine if PHA-owned units pass HQS/ NSPIRE.

No document is attached.

No document is attached.