



Moving to Work

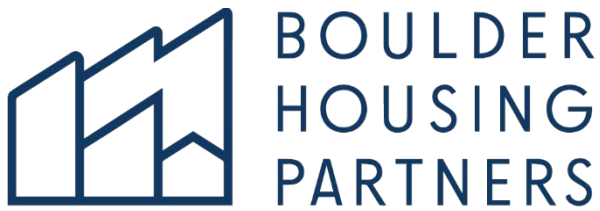
ANNUAL PLAN

2025



PLAN

2025



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 and nearly 5% of the city’s housing stock. In 2014, BHP’s Board of Commissioners adopted a bold strategic plan that calls for doubling our portfolio in the next ten years (by 2024), expanding our customer focus on children, and making BHP the nation’s first net-zero energy housing authority by 2030.

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Boulder Housing Partners

2025 MTW Annual Plan

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September 9, 2024	Draft released for public review
September 24, 2024	Public hearing
October 9, 2024	Approved by BHP Board of Commissioners
October 10, 2024	Submitted to HUD for approval
November 26, 2024	Comments received from HUD
December 5, 2024	Re-submitted to HUD with changes for approval

Section I: Overview of Short-term and Long-term MTW Goals and Objectives

Boulder Housing Partners (BHP) became part of the Moving to Work (MTW) Demonstration Program in 2012. This 2025 Plan represents our fourteenth year participating in the program.

Over the last 13 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-abled families, allowing them to keep any income increases received until the next regularly scheduled recertification that 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 that allows BHP to continue to serve the same population.
- Created our Bringing School Home program that started at our transformed public housing sites and is being expanded to other sites.
- Purchased 26 units of local, non-traditional affordable housing units.
- Provided funding to create 15 units of new project-based voucher housing for formerly homeless seniors
- Continued our partnership with Safehouse Progressive Alliance for Nonviolence using vouchers as transitional housing to house and serve eight families impacted by domestic violence.

In our experience, we understand that MTW flexibility enables BHP to truly be a strategic organization by allowing us the flexibility to evaluate our opportunities and our challenges and respond accordingly.

Completing the transformation of Public Housing

At the beginning of 2025, BHP continues to own 15 units of public housing at Arapahoe Court. BHP did receive approval to dispose of the remaining units in July 2024. BHP hopes to complete the disposition process and sell the property in 2025.

Providing more services to residents

BHP is proposing to use MTW funds to support the strengthening of our internal Resident Services Department to enhance our delivery of services and expand resident engagement across all of our work. Many of the funding sources to build affordable units, or provide rental assistance, do not come with money for supportive services. BHP hopes to provide the level of service needed to keep our elderly residents in their home where they can age in place with the services appropriate to their needs; assist persons with disabilities to receive the services they need to stay successfully housed and thrive; and provide families with options to increase their financial and social stability and support children to get the education they need to be successful. BHP will continue to focus on Bringing School Home, the local program that targets families with children under the age of 6. BHP will also continue to increase the number of families receiving services through the Family Self-Sufficiency (FSS) Program.

Increasing Housing Choice

BHP's strategic goal in 2014 was to contribute 2,000 affordable units to Boulder's permanently affordable inventory by 2024. To meet this goal, we needed to use maximum MTW flexibility.

In 2013, BHP had a total of 1,066 units. At the end of 2024, the number of units has increased to 1,896 units, with two more properties consisting of 173 units coming online in 2025 for a total of 2,069 units. In 2026, there are plans to add another 300+ units. The development pipeline currently has two properties land banked for future development, which will bring even more affordable units to our community.

In 2013, BHP administered 861 vouchers. As of 2024, BHP's voucher total has increased to 1,414. BHP has added 135 RAD Vouchers, 180 tenant protection vouchers, 22 Fair Share Vouchers, 35 Emergency Housing Vouchers (5 of which have already sunset), 138 Mainstream Vouchers, and 48 vouchers funded by the City of Boulder, which also provides supportive services for permanent supportive housing.

Section II: General Housing Authority Operating Information

The following tables describe housing options under the Public Housing and Housing Choice Programs. There are currently 937 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
CO016333333 AC	15	The Special Applications Center approved disposition of these units on July 12, 2024. In late 2024, BHP was relocating the one remaining tenant living at the property. Closing out the public housing units and sale of the property to be scheduled once all tenants have moved out.
TOTAL: Public Housing Units to be Removed in the Plan Year	15	

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
Rally Flats	10	No	Vouchers will be placed once construction is complete in 2025. These units will serve households experiencing or at risk of homelessness. Total number of units is 100.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Hawthorn Court	8	No	Vouchers will be placed once construction is complete in 2025 and serve households that are experiencing or at risk of homelessness. Total number of units is 73.
TOTAL: Planned new Project Based Units in Plan Year	18		

iv. 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	Permanent 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
Hawthorn Court	8	Leased	No	Permanent supportive housing for families
Hilltop	15	Leased	No	Permanent supportive housing for homeless age 62 +
Holiday McKinney	10	Leased	No	Permanent 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
Rally Flats	10	Leased	No	Permanently supportive housing for families
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	485			

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 2025.

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
BHP will use capital funds to support the disposition of the remaining public housing units and administration of the MTW program.

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**
Public Housing Units Leased	0	0
Housing Choice Vouchers (HCV) Utilized	15,970	1,331
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	302	25
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	16,272	1,356

* "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.

*** "Housing Choice Vouchers (HCV) Utilized" includes all SPVs within the MTW PHA's portfolio.

^ 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	302	25
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	BHP is disposing the remaining 14 public housing 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.

iii. Unique Households Served (Optional)

Number of unique households served annually through local, non-traditional rental services program such as short-term rental assistance, rapid rehousing, emergency housing, etc.

UNIQUE HOUSEHOLDS SERVED
N/A

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 (indicating whether the waiting list is site-based or agency-wide for public housing) 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
Housing Choice Voucher Lottery	Lottery	0	Closed	Yes

Please describe any duplication of applicants across waiting lists:

N/A

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 opened as vouchers become available each year.

Section III: Proposed MTW Activities

Activity 2012 – 4: Rent simplification for all households and asset limit

A. *MTW Activity Description*

Implementation of the Housing Opportunities through Modernization Act of 2016 (HOTMA) requires an amendment to this activity. In 2012, Boulder Housing Partners had limited the amount of assets a household could have upon admission to the program to \$50,000 with some exceptions. HOTMA requires that the asset limit be set at \$100,000, adjusted annually for inflation. BHP will adhere to the HOTMA limit of \$100,000 (adjusted annually) for admission to the Housing Choice Voucher program. BHP has adopted a policy of non-enforcement for voucher holders after they are in the program.

Income from assets: BHP will exclude all income from assets less than the threshold set by HUD. This will save time for participants and staff, resulting in very little impact on the cost of housing assistance payments.

Self-certification of assets: HOTMA requires that assets be fully verified once every three years. BHP will require households to submit asset verification at every regularly scheduled recertification (every two years for work-abled households and every three years for households who are elderly or a person with a disability). Verification can be a verification form completed by a financial institution or bank statement covering one month.

This activity allows BHP to use federal dollars more effectively, by reducing the staff burden of calculating income from assets. This activity will begin upon approval of the MTW Plan, expected for January 1, 2025. This activity, like all BHP's MTW Activities, also applies to all Special Purpose Vouchers administered by BHP, as long as there is no direct conflict with the rules pertaining to these vouchers.

B. *Cost Implications*

In 2012, BHP implemented an activity to exclude income from assets that were less than \$50,000. This has saved time for both staff and participants in providing documentation. With the increase in the threshold to \$100,000 (adjusted annually by HUD), we believe the savings of staff time will outweigh any increased cost to the program, which will be minimal. If there is any cost to the program, the minimal cost can be covered by budget authority.

C. *Need/Justification for MTW Flexibility*

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

C. 4, the Agency is authorized to restructure the initial, annual and interim review process in order to affect the frequency and methods and process used to establish integrity of the income information provided, and

C. 11. The Agency is authorized to determine family payment, including the total tenant payment, the minimum rent, the utility reimbursements and tenant rent, and to adopt and implement any reasonable policies for setting rents in public housing including establishing definitions of income and adjusted income, or earned income disallowance,

D. 2. a. the Agency is authorized to adopt and implement any reasonable policies to establish payment

standards, rents or subsidy levels for tenant-based assistance and to calculate the tenant portion of the rent that differ from the currently mandated program requirements, and

D. 3. b. the Agency is authorized to adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility.

Activity 2012 – 6: Utility allowance schedule

A. *MTW Activity Description*

In 2012, BHP implemented a simplified utility allowance based on bedroom size and whether the household was required to pay for water or not. BHP conducted an in-depth analysis of the current utility allowance structure and will modify the utility allowance structure to include three tiers: gas and electricity, water and sewer, and trash. If a household must pay for these utilities, they will receive the amount for each based on the lower of the bedroom size rented or voucher size. The utility chart will be updated annually.

	0 bedroom	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5 bedrooms
Electric/gas	\$ 55	\$ 60	\$ 85	\$ 105	\$ 125	\$ 145
Water/sewer	\$ 90	\$ 95	\$ 110	\$ 130	\$ 150	\$ 175
Trash	\$ 45	\$ 45	\$ 45	\$ 45	\$ 45	\$ 45

This activity allows BHP to use federal dollars more effectively, by reducing the staff burden of calculating income from assets. This activity will begin upon approval of the MTW Plan, expected for January 1, 2025. This activity applies to all Special Purpose Vouchers administered by BHP, as long as there is no direct conflict.

B. *Costs Implications*

Projected impact is an increase of \$169,116 in housing assistance payments, as this will increase the amount of utility allowance, resulting in a decrease in rent portion. This increase will be absorbed by budget authority and represents 1.1% of 2024 Budget Authority.

C. *Needs/Justification for MTW Flexibility*

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

D. 2. a. The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance and any reasonable policies to calculate the resident portion of the rent.

Activity 2016 – 1: Work-abled family tiered rent schedule

A. *MTW Activity Description*

In 2014, Activity 2014 – 1: Rent Reform for Housing Choice Work-abled Families was approved. It was amended and included in Activity 2016 – 1. This activity simplified the rent calculation for work-abled families participating in the Housing Choice Program. Work-abled families are all households whose head of household, spouse or co-head is not

elderly (elderly is defined as 62 years of age or older) or a person with disabilities. In 2020, this activity was extended to include families participating in the Family Self Sufficiency Program with a BHP voucher. This rent activity includes the following elements:

- *Flat tiered rent system:* total tenant payment is calculated using a two-step system. Based on family size and gross income, the family falls into an income tier. The income tier and the size of the unit determine the total tenant payment for the family. From this amount, if applicable, the utility allowance is subtracted, a flat fee per ineligible family member is added, and any amount the gross rent is above the payment standard is added.
- *Minimum rent:* the minimum rent is based on bedroom size and ranges from \$120 – \$180.
- *Biennial recertification:* households are recertified every two years.
- *No interim recertifications:* all interim recertifications were eliminated except for family composition or status changes, or if the family moves. If the household is claiming income that places them in income tier one, all increases in income must be reported until the family falls into income tier two. BHP created a Safety Net Fund in partnership with Emergency Family Assistance for this element of the activity, which is still active.
- *Flat fee per ineligible family member:* for those members who are not legally eligible to receive housing assistance, a flat fee of \$125 per member per month is added to their total tenant payment.

Since 2016, Fair Market Rents have increased between 42 – 60% based on bedroom size. This requires additional tiers to be added in the rent structure. BHP has tied the income chart to the Area Median Income which is updated annually by HUD. The rents are set at 30% in the middle of the tier. The income and rent charts will be updated January 1st every year.

	Income Tier Based on Family Size									
	1	2	3	4	5	6	7	8	9	10
1	0	0	0	0	0	0	0	0	0	0
2	2,555	2,920	3,285	3,650	3,943	4,235	4,528	4,820	5,110	5,402
3	5,110	5,840	6,570	7,300	7,885	8,470	9,055	9,640	10,220	10,804
4	7,665	8,760	9,855	10,950	11,828	12,705	13,583	14,460	15,330	16,206
5	10,220	11,680	13,140	14,600	15,770	16,940	18,110	19,280	20,440	21,608
6	12,775	14,600	16,425	18,250	19,713	21,175	22,638	24,100	25,550	27,010
7	15,330	17,520	19,710	21,900	23,655	25,410	27,165	28,920	30,660	32,412
8	17,885	20,440	22,995	25,550	27,598	29,645	31,693	33,740	35,770	37,814
9	20,440	23,360	26,280	29,200	31,540	33,880	36,220	38,560	40,880	43,216
10	22,995	26,280	29,565	32,850	35,483	38,115	40,748	43,380	45,990	48,618
11	25,550	29,200	32,850	36,500	39,425	42,350	45,275	48,200	51,100	54,020
12	28,105	32,120	36,135	40,150	43,368	46,585	49,803	53,020	56,210	59,422
13	30,660	35,040	39,420	43,800	47,310	50,820	54,330	57,840	61,320	64,824
14	35,770	40,880	45,990	51,100	55,195	59,290	63,385	67,480	71,540	75,628
15	40,880	46,720	52,560	58,400	63,080	67,760	72,440	77,120	81,760	86,432
16	45,990	52,560	59,130	65,700	70,965	76,230	81,495	86,760	91,980	97,236
17	51,100	58,400	65,700	73,000	78,850	84,700	90,550	96,400	102,200	108,040

18	56,210	64,240	72,270	80,300	86,735	93,170	99,605	106,040	112,420	118,844
19	61,320	70,080	78,840	87,600	94,620	101,640	108,660	115,680	122,640	129,648
20	66,430	75,920	85,410	94,900	102,505	110,110	117,715	125,320	132,860	140,452
21	71,540	81,760	91,980	102,200	110,390	118,580	126,770	134,960	143,080	151,256
22	76,650	87,600	98,550	109,500	118,275	127,050	135,825	144,600	153,300	162,060
23	81,760	93,440	105,120	116,800	126,160	135,520	144,880	154,240	163,520	172,864
24	86,870	99,280	111,690	124,100	134,045	143,990	153,935	163,880	173,740	183,668
25	91,980	105,120	118,260	131,400	141,930	152,460	162,990	173,520	183,960	194,472
26	97,090	110,960	124,830	138,700	149,815	160,930	172,045	183,160	194,180	205,276
27	102,200	116,800	131,400	146,000	157,700	169,400	181,100	192,800	204,400	216,080

Tier	Total Tenant Rent Based on Number of Bedrooms						
	0	1	2	3	4	5	6
1	120	120	125	130	140	160	180
2	120	120	125	145	160	185	205
3	160	170	205	240	265	305	345
4	225	240	290	335	370	425	485
5	290	310	370	430	475	545	620
6	350	375	450	520	585	670	760
7	415	445	535	615	690	790	895
8	480	515	615	710	795	910	1,035
9	545	580	700	805	900	1,030	1,170
10	605	650	780	900	1,005	1,155	1,310
11	670	720	865	995	1,110	1,275	1,445
12	735	790	945	1,090	1,220	1,395	1,585
13	830	890	1,070	1,235	1,375	1,580	1,790
14	960	1,025	1,230	1,425	1,590	1,820	2,065
15	1,085	1,165	1,395	1,615	1,800	2,065	2,345
16	1,215	1,300	1,560	1,805	2,010	2,305	2,620
17	1,340	1,440	1,725	1,995	2,225	2,550	2,895
18	1,470	1,575	1,890	2,185	2,435	2,790	3,170
19	1,595	1,710	2,055	2,375	2,645	3,035	3,445
20	1,725	1,850	2,220	2,565	2,860	3,275	3,720
21	1,855	1,985	2,380	2,755	3,070	3,520	3,995
22	1,980	2,120	2,545	2,940	3,280	3,765	4,270
23	2,110	2,260	2,710	3,130	3,495	4,005	4,545
24	2,235	2,395	2,875	3,320	3,705	4,250	4,825
25	2,365	2,535	3,040	3,510	3,915	4,490	5,100
26	2,490	2,670	3,205	3,700	4,130	4,735	5,375
27	2,620	2,805	3,370	3,890	4,340	4,975	5,650

This activity allows families to increase income without having the immediate effect of raising their rent portion. This activity, like all BHP's MTW Activities, also applies to all Special Purpose Vouchers administered by BHP, as long as there is no direct conflict with the rules pertaining to these vouchers.

B. Costs Implications

Based on current household data for 361 households, tenant rent will decrease by \$20,735 per month, or \$248,820 per year. This has a direct impact on housing assistance payments. Based on 2024 budget authority, this represents an increase of 1.6% in housing assistance payments.

C. Needs/Justification for MTW Flexibility

Attachment C, Section D. 1. c: The Agency is authorized to define, adopt, and implement a reexamination program that differs from current program requirements.

Attachment C, Section D. 2. a: The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differs from current program requirements.

D. Rent Reform Information

i. Impact Analysis

As stated above, the impact on the participant's portion of the rent will decrease by \$20,735 per month. There are currently 361 households under the work able rent calculation. The average rent burden will decrease from 41.1% to 38.7%. Rent will decrease for 272 households, stay the same for 32 households, and increase for 57 households. For the households who will see an increase in rent, the average increase is \$113, the rent burden will increase from 32% to 35%. The average income for these households is \$34,000. Ten of these households have income that are beyond the limits of the 2016-tiered chart and had an average rent burden of 27%. The income range for these 10 households is \$46,657 to \$132,876.

The range of rent burden within the tiers is from 24% at the top of the tier to 47% at the bottom of the tier (in the lowest income tier). Of the 361 households, 76 have at least one member who is ineligible to receive assistance. A flat fee of \$125 per member per month is added to their rent portion.

ii. Hardship Case Criteria

As this is not a new rent reform activity (tiers are only being updated), no hardship criteria are needed.

iii. Annual Reevaluation

BHP will be updating the income and rent charts annually, based on HUD's income limits. As this is updated, the impact on households will also be monitored annually to determine if any changes need to be made.

iv. Transition Period

Beginning with recerts in 2025, the income tiers and rent amounts will be adjusted at the household's regularly scheduled recertification, which happens every two years.

Activity 2025-1: Student financial assistance excluded from income

A. MTW Activity Description

Under the Housing Opportunities through Modernization Act of 2016 (HOTMA), the rules for defining which types of student financial assistance are included or excluded from annual income are confusing and dependent on the wording in the appropriations language each year. BHP believes that when participating household members are working towards getting an education to better their financial situation, they should not be penalized by including

student financial assistance as income. BHP is proposing to eliminate from household income all student financial assistance in excess of tuition. Currently, there are two households on the program with an average of \$3,170 in financial assistance included as income. By removing this income, participant rent would be reduced by \$370 per month. This results in an annual increase in HAP of \$4,440.

B. Costs Implications

Based on the two households currently on the program, this would increase HAP costs by \$4,440 annually.

C. Needs/Justification for MTW Flexibility

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

D. 2. a: The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differs from current program requirements.

Activity 2025-2: Security deposit and moving expenses loan fund

A. MTW Activity Description

MTW Activity 2016 – 3 included a security deposit loan fund for newly issued voucher participants, which is now being incorporated into this activity. BHP is expanding this activity to all current voucher participants and including an option to borrow money for moving expenses.

BHP has seen success with the security deposit loan fund that has been offered to newly issued voucher applicants since 2016. The goal is to expand this opportunity to all voucher holders who are in good standing and wishing to move from one unit to another with continued assistance. Upon approval, BHP will pay the approved amount of the security deposit loan directly to the landlord. The participant will be responsible for making monthly payments to BHP for a maximum of 10 months interest free. Payments will begin on the first of the second month after move in. For example, if a household moves in during the month of October, payments would commence on December 1, with the final payment being made on September 1. Households may borrow up to 10% of their annual income or the full amount of the security deposit, whichever is less. Monthly payments will be equal to 10% of the amount borrowed.

BHP will also offer up to \$500 in moving expenses, to be paid back over the course of 10 months interest free. This money will be paid directly to the participant, once a unit has been found, and approved by BHP.

To be eligible for either both or one of these options, the voucher holder/applicant must:

- Not be currently living in the unit or be storing belongings in the unit;
- Be in good standing with the program (if already participating in the voucher program);
- Be able to pay the monthly housing costs (rent and utilities); and
- Be able to repay the loan within 10 months.

If the household is not able to repay the loan, housing assistance may be terminated after following the process for proposal of termination. Notification will be sent to households with missed or late payments reminding them of their obligation to repay the loan. Offers to adjust the payback period and/or amount will be made in extenuating circumstances. In the event of the death of a single-person household, the debt will be forgiven and

considered a HAP expense. MTW Authority is required to use our federal funds in this manner. This activity will increase housing choices not only for applicants, but also for current voucher holders.

B. *Costs Implications*

BHP does not anticipate any cost implications to this activity as it will be a revolving loan fund. In the event that the loan is not paid back, it will be considered a HAP expense. From 2016 - 2023, under Activity 2016 – 3, BHP loaned \$20,127 to households under this activity. All but \$325 was paid back, which was then covered by HAP revenue. If there are any non-payments, we anticipate the amount can be covered by HAP revenue (or administrative fees) if necessary.

C. *Needs/Justification for MTW Flexibility*

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

B. 1. B. viii.: The Agency is authorized to use MTW Funds for any eligible activity under Section 8(o) of the 1937 Act... to increase housing choices for low-income families.

B. 1. B. viii.: The Agency is authorized to use housing assistance payments for purposes other than payments to owners.

Section IV: Approved MTW Activities

Implemented

Activity 2012-5: Eliminate the 40% of income cap in the voucher program

Increasing housing choices for Housing Choice Voucher holders is accomplished by eliminating the 40% of income towards rent cap when voucher holders initially lease up. This activity was approved and implemented in 2012. This activity is being applied to special purpose vouchers. BHP does not anticipate any changes to the activity in 2025.

Activity 2013-1: Housing Quality Standards (HQS) inspection schedule

This activity aligns the inspection cycle with the recertification schedule. Since 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 families were aligned with the biennial recertification schedule. This activity is being applied to special purpose vouchers. This activity was approved and implemented in 2013 and 2014. BHP does not anticipate any changes to this activity in 2025.

Activity 2013-2: Eliminate Utility Reimbursement Payments

To ensure all Housing Choice Voucher participants are contributing towards their rental payment, utility reimbursement payments were eliminated. In 2013, households who had been receiving a utility reimbursement payment were grandfathered in for 12 months. No new instances of utility reimbursement payments were allowed after April 1, 2013. With the final disposition of the remaining Public Housing units in 2025, this activity only applies to Housing Choice Voucher participants. This activity was approved and implemented in 2013. This activity is being applied to special purpose vouchers. BHP does not anticipate any changes to the activity in 2025.

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 impacted by 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 this activity in 2025.

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

This activity allows BHP to use Replacement Housing Factor (RHF) 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 this activity in 2025. Once BHP has received and used all the RHF Funds, and the subsequent Demolition and Disposition Transitional Funding, this activity will be closed.

Activity 2015-1: Affordable housing acquisition and development fund

BHP's Strategic Plan calls for adding 2,000 affordable units by 2024. This activity allows 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 (six 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 five additional units. In 2020, MTW funds purchased an additional two units for a total of 28 units and land. In 2023, funds were used towards new construction of 15 units of project-based voucher assistance for the chronically homeless at the Hilltop property, which will be completed in 2024/2025. In 2024, funds were used to build 10 new units of project-voucher assistance for households who are experiencing or at risk of homelessness at the Rally Flats project, set to open in 2025. This activity was approved and implemented in 2015. BHP follows the rules and guidelines set forth in PIH 2011-45 Parameters for Local, Non-Traditional Activities under the Moving to Work Demonstration Program. BHP does not anticipate any changes to this activity in 2025.

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 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 (unless reported household income is less than \$6,000 annually).

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. This activity is being applied to special purpose vouchers. BHP does not anticipate any changes to this activity in 2025.

Activity 2016-3: Landing landlords

BHP operates in an exceptionally tight rental market. This activity aims to increase housing choices by 1) providing an incentive for new landlords to participate in the program, 2) creating a damage claim fund for landlords, and 3) restricting moves for current participants who are not in program compliance. This activity was approved in 2016 and was fully implemented in 2018. The damage claim fund was increased to a maximum of \$5,000 from \$2,000. The security deposit loan fund is being removed from this activity and incorporated into Activity 2025-3. See Section III. Proposed MTW Activities. No other changes are anticipated to the activity in 2025.

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, vulnerable families with at least one 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 2023, BHP brought the wait list for these properties in-house, instead of relying on our partner agency to hold the wait list. BHP found that the vacancy time had 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. BHP does not anticipate any changes to this activity in 2025.

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.

Move up strategy for project-based voucher households (formerly known as Allow participants at our project-based voucher sites who are no longer receiving housing assistance payments to remain on the voucher): this activity was amended and approved in 2024. Participating families can continue to live at the project-based voucher site and remain on the voucher until their income has reached 60% of Area Median Income for their family size. At that point, they will be placed on a six-month safety net during which time if their income decreases, they can stay at the property, or if there is no loss of income they will need to move from the property with a tenant-based voucher. This allows new households the opportunity to benefit from a project-based voucher.

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.

Next available voucher rule: In 2024, HUD approved extending the timeframe that project-based voucher holders can request the next available voucher to move with from 12 months to 36 months after initial occupancy.

This activity is being applied to 20 Mainstream vouchers. BHP does not anticipate any changes to this activity in 2025.

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 Activity 2016-1 for the families living at our Woodlands Community who are receiving services through the Family Self-Sufficiency Program. In 2023, the offer to participate in the FSS program was extended to all of BHP's project-based voucher properties. In 2024, BHP updated the amounts and added some goals achieved under the escrow calculation from this activity, which applies to all FSS participants with a BHP voucher. BHP does not anticipate any changes to this activity in 2025.

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 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 not implemented, as it placed a greater burden on landlords to self-certify to HQS standards 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. As it would only affect a small group of families who eventually will be converting to the voucher program, the 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, incorporated into MTW Activity 2016-2 and closed in 2016.

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 total public housing units was greatly reduced in 2015 and 2020 after conversion of seven public housing sites. The population in the remaining 15 units rarely use this option so the activity was closed out in 2021.

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 closed out this activity in 2022 and reverted to the HUD rules, which allows 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 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, which 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	0
70600	HUD PHA Operating Grants	13,342,751
70610	Capital Grants	0
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	69,129
70000	Total Revenue	13,411,880

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	886,489
91300+91310+92000	Management Fee Expense	300,352
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	120,965
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	0
93500+93700	Labor	0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	66,403
95000 (95100+95200+95300+95500)	Total Protective Services	0
96100 (96110+96120+96130+96140)	Total Insurance Premiums	17,789
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	27,346
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	0
97100+97200	Total Extraordinary Maintenance	0
97300+97350	HAP + HAP Portability-In	13,348,131
97400	Depreciation Expense	0
97500+97600+97700+97800	All Other Expense	0
90000	Total Expenses	14,767,474

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

We expect expenses to be higher than revenue based on the disposition of the remaining public housing units.

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, non-traditional affordable housing. BHP also plans to use \$100,000 to fund supportive services.

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*	\$ 2,615,843	\$ 1,050,000
HCV Admin Fee	\$ 50,006	\$ 50,000
PH Operating Subsidy	\$ 100,244	\$ 100,000
TOTAL:	\$ 2,766,093	\$ 1,200,000

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.
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.

FDS Line Number	FDS Line Item	Definition
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.

MTW HCV HAP – HAP reserves will be used to absorb increased costs due to payment standards and higher levels of utilization in 2025.
HCV Admin Fee – Admin Fee reserves will be spent on salaries for expanded HCV staffing and resident services staffing for PBV sites.
PH Operating Subsidy – Reserves will be spend to cover any remaining cost associated with the disposition of the PH.

* 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 MANAGEMENT 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 Chair 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 (01/01/2025), 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 (42 USC 2000d-1), the Fair Housing Act (42 USC 3601 et seq.), section 504 of the Rehabilitation Act of 1973 (29 USC 794), title II of the Americans with Disabilities Act of 1990 (42 USC 12131 et seq.), the Violence Against Women Act (34 USC 12291 et seq.), all regulations implementing these authorities; and other applicable Federal, State, and local fair housing and civil rights laws.
- (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 signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies, for the PHA's jurisdiction and a description of the way the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
- (7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR 5.151). The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.
- (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 the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not base a determination of eligibility for housing based on actual or perceived sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity), will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.
- (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, 31 U.S.C. § 1352.
- (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 2 CFR 200.334 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 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), as applicable.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) 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.
- (23) 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 and should be made available electronically, upon request.

Boulder Housing Partners

 MTW PHA NAME

CO016

 MTW PHA NUMBER/HA CODE

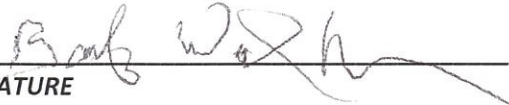
I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and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

Bob Walker

 NAME OF AUTHORIZED OFFICIAL

Board of Commissioners Chair

 TITLE



 SIGNATURE

October 9, 2024

 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 proposed amendments and new activities were presented to the Board of Commissioners on July 11, 2024. In late July, notice was sent to all voucher participants and applicants informing them of public hearings on August 13, 2024 (for the Admin Plan changes) and September 24, 2024, for the 2025 MTW Annual Plan. A meeting was held on August 8, 2024, with the Tenant-based Resident Advisory Board (TRAB) to discuss the amendments and gather input for the new activity related to security deposit loan fund for all voucher holders. The idea was also presented at the public hearing that was held for changes to the Administrative Plan held on August 13, 2024. The draft 2025 MTW Annual Plan was posted to the BHP website on September 9, 2024, and was presented at the TRAB meeting on September 12, 2024. An in-person public hearing was held on September 24, 2024 (notice has already been sent, public notice will be posted in the [Daily Camera](#) the week prior) and a virtual public hearing was held on September 25, 2024. A total of 17 people attended the public hearings for the MTW Annual Plan. A table of all the comments received begins on the next page.

BHP also created a webpage specific to voucher holders. This webpage includes upcoming HCV events (such as public hearings and HCV Educational Sessions), the Administrative Plan, HCV Newsletters, Process Overviews and Resources. A postcard was sent to all participants and applicants announcing this website. The information is also shared in all briefing packets.

Planned and Ongoing Evaluation of the Demonstration

BHP partnered 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 does not have any current plans for future evaluation of the demonstration.

Lobby Disclosures

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

Topic:	Comments:	Response:
Asset limit	If the asset limit is being raised to \$100,000 from \$50,000- people with more resources can be accepted	Yes, that is true. HUD established the limit of \$100,000 and BHP is not allowed to change the amount.
Asset limit	Currently, you are asking for 6 months' worth of statements. Is this going to change?	Yes, per the new HUD rules, only the current month statement for each account will be needed.
Elimination of 40% cap towards rent	Does the rent burden cap of 40% Cap authorize BHP to increase the Tenant Portion for all of our Voucher Holders to 40% of their income towards rent?	No. The rent burden cap only applies to tenant-based voucher holders who chose to rent a unit where the contract rent is higher than the payment standard. The difference between the payment standard and the contract rent is added to participant's portion of rent based on income. In the traditional program, HUD rules state that if the participant portion is more than 40% of their income, the unit cannot be approved, and the voucher cannot be used at that unit. The contract rent on the project-based vouchers is set at a rent within the payment standard.
General MTW question	When do commissioners approve new MTW Activities?	BHP Board of Commissioners will approve the 2025 MTW Annual Plan on October 9, 2024. It will then be submitted to HUD for final approval.
General MTW question	How many PHAs are there across the country? How many of them MTW?	There are approximately 3,400 PHAs across the nation. Congress has authorized 139 PHAs to participate in this program.
General MTW question	MTW Annual Plan only applies to Voucher Holders? Is there a requirement for an Annual Plan for anything else BHP does?	The MTW Program only applies to the Housing Choice Voucher Program (both tenant-based and project-based vouchers). There is no other program that BHP administers that requires an Annual Plan.
General MTW question	Legal Consultant that is very familiar with what we are talking about today and is really excited for these changes!	Thank you, we are excited about them too.
HCV General question	Does HUD give out "new vouchers" every year?	No, they do not.
HCV General question	What percentage of the vouchers that we issue each year are "New Vouchers?"	HUD does not automatically issue new vouchers every year. We depend on attrition from current households who give up their voucher or leave the program. In 2024, BHP received 14 new vouchers (replacement vouchers for disposing of the final PH units). In 2023, BHP received 8 new vouchers (Fair Share Vouchers). In 2022, BHP received 10 new vouchers (Fair Share Vouchers).

HCV General question	When we issue vouchers to new applicants, where do the families that gave up the voucher go?	This depends on each individual household.
HCV General question	Why do families go off the Voucher Program?	Some single household participants pass away or go to a nursing home, some households increase their income to a point where they no longer need the assistance, some households are terminated from the program because they are not in compliance with the program rules.
HCV General question	Would like to move. Was told he cannot rent the unit if the owner lived in the unit?	Regulations state that a unit is ineligible when a unit is occupied by its owner or by a person with any interest in the unit. 24 CFR 982.352(a)6]
HCV General question	What does it take to get a unit approved?	The HCV team must receive the Request for Tenancy Approval to ensure the rent is reasonable and the unit passes the Housing Quality Standards.
HCV General question	Is our inspector Independent or does he work for BHP?	The HCV team works with the BHP Maintenance Department who has certified inspectors conduct the inspections for the HCV program.
HCV General question	Can we assume that if the unit has passed Boulder County Inspection, it will also pass HCV inspection?	That is a pretty safe assumption, as we believe the building code inspection is more stringent than current Housing Quality Standards.
HCV General question	There should be some kind of safeguard that restricts landlord from raising the rent if they do not give proper notice.	The Housing Assistance Payment Contract that a landlord/owner signs requires a 60-day notice of rent increase be provided to BHP. The HCV team asks participants to always send us a copy of any rent increase notice they receive as well.
HCV General question	Are there forms on the website?	Yes, there are forms available. https://boulderhousing.org/i-need-help-finding-an-affordable-rentals/hcv-participants/
HCV General question	If there is a change in my family size, do I have to move?	Not necessarily. You will be provided with a 120-day notice of a rent increase if the voucher size decreases. You then have the option to stay in place and pay the increase in rent or move to a different unit.
Lottery	There is a gap for TBV applicants who applied in October 2023 and have not received their voucher yet.	Yes, there are still some applicants who applied in October 2023 who have not yet been processed for a voucher. We are working through all the applicants, but we have not had as many vouchers turn over as we thought we would, which has caused a delay in processing the applicants.
Lottery	Is our lottery really random?	Yes, it is.

Other	We need an action item for transportation, better than the Ecompass, that covers all residents.	This is not a focus for the HCV or MTW program currently and is being looked at by other departments at BHP. The MTW program only covers the Housing Choice Voucher Program, not all the units owned and managed by BHP.
PBV	In respect to Rally Flats, who are these project-based vouchers designed for?	There are units set aside for families or individuals who are considered homeless under HUD's definition.
PBV	If they are for a family, do the units come with a bathtub for parents to bathe their toddlers?	Yes, all two-bedroom units come with a bathtub in our new developments.
PBV	What does PBV mean?	Housing Authorities, like BHP, can take some of their Tenant-Based Vouchers (TBVs) and attach them to units at a property, which are then called Project-Based Vouchers (PBVs).
PBV	BHP has project based 30% of the total vouchers they receive?	BHP currently has 34% of the vouchers project-based, which does include 135 that HUD required to be project-based.
PBV	Is Golden West being project-based vouchers?	No, BHP has no plans to project-base any vouchers at Golden West.
PBV	How many vouchers does BHP plan on project-basing? That is just taking units away from tenant-based vouchers, who then must give up their voucher if they want to live in a project-based property.	BHP no longer project bases vouchers on 100% of the units in a project, which allows for most units at a property to be available for households with tenant-based vouchers. Of the 1,800 plus units owned and managed by BHP, 457 are project-based. When someone lives in a project-based voucher unit, they can request the next tenant-based voucher after 3 years and leave the property with voucher assistance.
Port	Is there anywhere you cannot port-your voucher to?	You can port your voucher to any of the 50 states and territories, as long as there is a Public Housing Authority that covers the area in which you live. Karen doesn't know of any areas that are not covered. HUD provided a HUD resource locator website: https://resources.hud.gov/#

Rent tiered system	Rent Tiered System: are the 104 households impacted the lowest earners? I would like to formally look into that for the Board of Commissioners	Correction: 57 households will see an increase. The average increase for these 57 households is \$113. The average current rent burden is only 32%. The average rent burden after the new tiers go into effect is 35%. Average income for these families is \$34,000. 10 of these families had incomes that were beyond the original tier structure that was set and had an average rent burden of only 27%. Income for these 10 families ranged from \$46,657 to \$132,876.
Security deposit and moving expenses	Moving expenses loan: could it be a grant for \$500?	Staff discussed this possibility but have not come up with a way to make it fair to all. If we set aside a certain amount each year, how does it get distributed evenly? First come, first served? Everyone who moves in the first part of the year may exhaust all the funds. This will be considered once we know how much this will be used, as the money must come from someplace.
Security deposit and moving expenses	If there is a calamity, if there is an emergency, can we re-visit the loan payback agreement?	Always, this can be re-visited and revised based on extreme circumstances.
Security deposit and moving expenses	There needs to be a contamination exception for moves that includes a grant. Radon is an issue.	This is a great thought and when we re-visit the loan for moving expenses, we will consider it.
Security deposit and moving expenses	10-month period to pay back Security Deposit Loan Fund and Moving Expenses Fund is cool!	Thank you, we hope it will help with the moving process.
Security deposit and moving expenses	What was the percentage of applicants that paid back the Security Deposit Loan Fund?	From 2016 through 2023, \$17,000 has been loaned out to 25 households. All but \$325 has been paid back.
Security deposit and moving expenses	Does the current Security Deposit Loan fund apply to all applicants regardless of if they have a voucher or not?	It only applies to applicants from the Housing Choice Voucher Lottery who are going to lease up with their voucher. The new activity will include current voucher participants who wish to move with their voucher.
Security deposit and moving expenses	Let me make sure I understand the amount of security deposit I can borrow? If I make \$40,000 per year, how much can I get?	You can borrow up to 10% of your annual income or the full amount of the security deposit, whichever is less. In this case, you could borrow up to \$4,000, which is 10% of your income, as long as the security deposit is \$4,000 or more.

Security deposit and moving expenses	Can I take advantage of the security deposit loan fund if I move outside of Boulder County?	No, participants must be leasing up with their voucher within Boulder County.
Student financial aid	Student Financial Aid: Is this an incentive to go back to school, if we can receive financial aid?	All participants can return to school if they wish to do so. IF there is any financial assistance received in excess of tuition, that amount will not be included in household income upon which rent portion is calculated.
Student financial aid	It's about time the Student Financial Assistance in Excess of tuition included as income rule be removed!!!	We agree!
Student financial aid	It's awesome that you are going to remove the student financial aid.	We think so too!
Supportive services	Supportive Services: Question about the wording "and properties that received MTW funds to support development and/or acquisition".	BHP has used MTW funds to acquire or build units. The money for supportive services will be used for residents living at BHP units with BHP vouchers.
Supportive services	Supportive Services: is this TRAB going to be under an umbrella of resident services?	No, it will not. The TRAB is to provide feedback on the Housing Choice Voucher Program.
Supportive services	Can private investment be used for funding resident services?	Yes, we are not restricted to the type of funds that can be used to fund the Resident Services Department.
Supportive services	What kind of services are we envisioning that Resident Services will be able to provide with the \$100,000 funding appropriated for them? Will services be extended to all voucher holders?	Resident Services will focus on benefit acquisition, resource navigation, onsite community activities and programs, and case management to support residents. The goal would be to extend services to all voucher holders; however, a source of funding needs to be found to support this.
TRAB	How does the transition away from public housing coincide with tenant-based advisory board versus the Resident Representative Council?	HUD requires the RRC for the public housing program and a TRAB for directly assisted tenants through the voucher program. BHP uses the TRAB as one mechanism to receive feedback. Other mechanisms include public hearings, HCV educational sessions, resident meetings, etc.
TRAB	Representative councils were only for PH, but there are resident meetings at all sites?	BHP's goal is to hold at least one meeting per year at all of our 37 communities. This may differ depending on the size of each community. Some communities have more than one meeting per year. Some sites do have their own resident councils.

Utility allowance	Utility Allowance: How do you get it?	When a participant must pay for utilities that are not included in the rent, the utility allowance is automatically added when calculating your portion of the rent.
Utility allowance	Utility Allowance: But BHP properties?	As of mid-2024, BHP is including all utilities in the rent so no utilities will need to be paid for out of pocket.
Utility allowance	Utility Allowance: Lower of bedroom size or voucher size?	That is correct. HUD rules state that it is the lower of bedroom or voucher size. If someone with a 3-bedroom voucher rents a 2-bedroom unit, the utility allowance will be based on the 2-bedroom amount.
Utility allowance	Utility Allowance: does this affect LEAP?	BHP Resident Services Department is still looking into this issue. They will let everyone know once they have more information.
Utility allowance	Is the change in the utility allowance going to increase our portion of rent?	No, the impact analysis shows that the utility allowance amounts have increased, which should reduce the rent a participant needs to pay.

DISCLOSURE OF LOBBYING ACTIVITIES

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

Approved by OMB
4040-0013

Review Public Burden Disclosure Statement

1. * Type of Federal Action: <input checked="" type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. * Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input checked="" type="checkbox"/> c. post-award	3. * Report Type: <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
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4. Name and Address of Reporting Entity:

Prime SubAwardee

* Name:

* Street 1: Street 2:

* City: State: Zip:

Congressional District, if known:

5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:

6. * Federal Department/Agency: <input type="text" value="U.S. Department of Housing and Urban Dev"/>	7. * Federal Program Name/Description: <input type="text" value="Moving to Work Demonstration Program"/> CFDA Number, if applicable: <input type="text"/>
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8. Federal Action Number, if known: <input type="text"/>	9. Award Amount, if known: \$ <input type="text"/>
--------------------------------------------------------------------	--------------------------------------------------------------

10. a. Name and Address of Lobbying Registrant:

Prefix * First Name Middle Name

* Last Name Suffix

* Street 1 Street 2

* City State Zip

b. Individual Performing Services (including address if different from No. 10a)


Prefix * First Name Middle Name

* Last Name Suffix

* Street 1 Street 2

* City State Zip

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 the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

* Signature: 

* Name: Prefix * First Name Middle Name

* Last Name Suffix

Title: Telephone No.: Date:

Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Reports Management Officer, Office of Policy Development and Research, REE, Department of Housing and Urban Development, 451 7th St SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0157.

Applicant Name

Boulder Housing Partners

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)

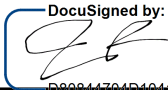
Name of Authorized Official

Jeremy Durham

Title

Executive Director

Signature

DocuSigned by:


B00044704D10413...

Date (mm/dd/yyyy)

9/4/2024