

SUBMITTED MARCH 17, 2025

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# I. INTRODUCTION

## OVERVIEW OF MTW GOALS AND OBJECTIVES

This 2024 Annual Report highlights the activities of Boulder Housing Partners (BHP) in our thirteenth year as a participant in the Moving to Work (MTW) demonstration program.

In 2024, we amended Activity 2020-1: FSS Rent and Escrow Calculations. Escrow is earned in one of two ways: based on goals achieved for each year in the FSS program and based on the amount of earned income included in the rent calculation during years 3, 4 and 5 in the program. Goals were added and amounts were increased for the escrow under the amendment to this activity.

We also amended Activity 2018 – 1: Project Based Voucher Waivers. One aspect of the activity was amended, and one element was added. We amended the move up strategy for project-based households which originally allowed households to remain in the project-based voucher unit regardless of their income. We implemented a policy for households to move on from the project-based voucher unit once their income reaches 60% of the area median income for the family size. The element that was added was to increase the amount of time a household must remain in the unit for 36 months (from 12 months) to reduce turnover and stabilize the communities.

In 2024, we received 14 Tenant Protection Vouchers for the disposition of the remaining 14 units of public housing. Application for disposition of this community was submitted in early 2024. As of December 31, 2024, one resident remains at the property.

Since our inception in the MTW Program, BHP has:

- Implemented rent reform with triennial recertifications for households who are elderly and/or persons with a disability.
- Implemented a flat tiered rent structure and biennial recertifications for our work-able families.
- Eliminated the need for all Housing Choice families to report income increases prior to their next regularly scheduled recertification.
- Eliminated the 40% cap of income towards rent for Housing Choice voucher holders.
- Simplified the utility allowance schedule for Housing Choice voucher households and eliminated utility reimbursement payments.
- Tied the Housing Quality Standards (HQS) inspection to the recertification cycle.
- Offered housing and services to victims of domestic violence with our partner Safehouse Progressive Alliance for Non–Violence (SPAN).

- Used Replacement Housing Factor Funds to create 1175 Lee Hill, a 31–unit community to house individuals who have experienced chronic homelessness.
- Created a Development and Acquisition Fund which allowed us to purchase 27 units of affordable housing and 5.25 acres of land.
- Converted 312 units of public housing through Section 18 Disposition and the Rental Assistance Demonstration Program, while creating 3 new community centers and renovating all units to like-new conditions.
- Created the Bringing School Home Program, which focuses on families with children under 6 and offers services so children are school-ready for kindergarten.
- Implemented a new escrow model for families in the Family Self Sufficiency program to allow for escrow to be earned based on goals achieved along with escrow based on earned income.

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

With the final rule of Housing Opportunities Through Modernization Act (HOTMA) being released, changes will be coming to BHP’s current MTW activities. Some may be closed out completely and others will need some adjustments, as HOTMA is bringing efficiency to the regulations in general and MTW authority will not be needed for some of our activities. As described in full detail in the 2024 MTW Annual Plan, Boulder Housing Partners will be focusing on these main areas in the coming years: 1) Transforming Bureaucracy; 2) Increasing Housing Choice; 3) Bringing School Home; and 4) Completing the Conversion of Public Housing.

#### 1) Transforming Bureaucracy: People, Not Paper

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

#### 2) Increasing Housing Choice

In 2024, we added 14 Tenant Protection Vouchers, which replace the 14 units of Public Housing that were approved for disposition. We did not add any units in 2024, however, we acquired a 253-unit senior building on January 1, 2025, and are currently under development for three new communities (total of 233 units), which will open for new residents in 2025. BHP’s current pipeline shows 500+ units in the coming years.

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

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

#### 4) Completing the Conversion of Public Housing

BHP continues to own 14 units of Public Housing. Disposition was approved in 2024, with one resident remaining as of December 31, 2024.

## II. GENERAL HOUSING AUTHORITY OPERATING INFORMATION

### A. HOUSING STOCK INFORMATION

#### i. Actual New Project Based Vouchers

Tenant-based vouchers that the MTW PHA project-based for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) was in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS NEWLY PROJECT-BASED (Planned*)	NUMBER OF VOUCHERS NEWLY PROJECT-BASED (Actual)	STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
Hilltop (formerly known as Mount Calvary)	15	0	Committed	No	Vouchers will be placed once construction is complete. The anticipated date was December 2024, however, units were not completed until January 2025.
Rally Flats	10	0	Committed	No	Vouchers will be placed once construction is complete in mid-2025.
Hawthorn Court	8	0	Committed	No	Vouchers will be placed once construction is complete in late 2025.
<b>Total:</b> Planned or Actual Newly Project-Based	33	0			

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

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

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

Both these projects are new construction. Placement of vouchers depends on the units passing HQS inspection. For Hilltop that did not happen until January 2025. Rally Flats is estimated to be completed in summer 2025.

**i. Actual Existing Project Based Vouchers**

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP or HAP was in place by the beginning of the Plan Year. Indicate whether the unit is included in RAD.

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

452

452

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

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

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

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

N/A

**ii. Actual Other Changes to Housing Stock in the Plan Year**

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

ACTUAL OTHER CHANGES TO HOUSING STOCK IN THE PLAN YEAR
BHP received 14 Tenant Protection Vouchers in 2024 to replace the 14 units of Public Housing that are in the process of disposition.

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

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

GENERAL DESCRIPTION OF ALL ACTUAL CAPITAL EXPENDITURES DURING THE PLAN YEAR
BHP spent a total of \$252,014 of Capital Funds in 2024 to support the resident relocation at Arapahoe Court (14 units of public housing).

**ii. LEASING INFORMATION**

**i. Actual Number of Households Served**

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

NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS SERVED**	
	Planned^^	Actual	Planned^^	Actual
Public Housing Units Leased	50	23	8	2
Housing Choice Vouchers (HCV) Utilized***	10,980	16,116	900	1,343
Local, Non-Traditional: Tenant-Based	0	0	0	0
Local, Non-Traditional: Property-Based	312	267	26	22
Local, Non-Traditional: Homeownership	0	0	0	0
	11,342	16,406	934	1,367

Planned/Actual Totals

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

\*\* “Planned Number of Households to be Served” is calculated by dividing the “Planned Number of Unit Months Occupied/Leased” by the number of months in the Plan Year (as shown in the Annual MTW Plan).

\*\*\* “Housing Choice Vouchers (HCV) Utilized” includes all SPVs within the MTW PHA’s portfolio.

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

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

BHP’s remaining public housing units were approved for disposition in 2024. In July 2023, BHP began working these families on relocation, as this population needed more time to find appropriate housing. We served less families during 2024, as we were able to move families soon than we had anticipated. All the families were issued a voucher with which to relocate. In the 2024 Annual Plan, only MTW vouchers were included in the HCV utilized line. With the updated 50900, this line now includes all SPVs within the portfolio which explains the increase from the Planned to Actual. Housing Choice Voucher utilization rates averaged 98% over all programs for 2024. LNT units were vacant longer than anticipated due to turnover costs and time.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS TO BE SERVED*	
		Planned^^	Actual	Planned^^	Actual
Tenant-Based	N/A	0	0	0	0
Property-Based	2015-1 Affordable housing acquisition and development fund	312	267	26	22
Homeownership	N/A	0	0	0	0

312	267	26	22
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**Planned/Actual Totals**

\* The sum of the figures provided should match the totals provided for each Local, Non-Traditional category in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

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

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

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

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

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS
Public Housing	As of December 31, 2024, there was one remaining resident in the units approved for disposition.
Housing Choice Voucher	The utilization rate was higher than anticipated, and 14 Tenant Protection Vouchers were added in fall 2024 due to the approved disposition of PH, with an annualized occupancy rate of 98%.
Local, Non-Traditional	A few units were vacant longer than expected due to turnover time and remediation.

**i. Unique Households Served (OPTIONAL)**

The 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

**iii. WAITING LIST INFORMATION**

**i. Actual Waiting List Information**

Snapshot information on the actual status of MTW waiting lists at the end of the Plan Year. The “Description” column should detail the structure of the waiting list (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	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
Arapahoe Court	PH site-based list	0	Closed	No
HCV Lottery	Lottery for HCV	78	Closed	Yes

Please describe any duplication of applicants across waiting lists:

There are no duplications between the waiting lists.
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**ii. Actual Changes to Waiting List in the Plan Year**

Please describe any actual changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF ACTUAL CHANGES TO WAITING LIST
Arapahoe Court	The list for Arapahoe Court was dissolved as BHP received approval for disposition.
HCV Lottery	The lottery was open June 25 - 26, 2024.

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

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

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

INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80%-50% Area Median Income	4
49%-30% Area Median Income	5
Below 30% Area Median Income	2

Total Local, Non-Traditional Households Admitted

11
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**ii. Maintain Comparable Mix**

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

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

“Non-MTW Adjustments” are defined as factors that are outside the control of the MTW PHA. An example of an acceptable “Non-MTW Adjustment” would include demographic changes in the community’s overall population. If the MTW PHA includes “Non-MTW Adjustments,” a thorough justification, including information substantiating the numbers given, should be included below. MTW PHAs must continue to adhere to all fair housing obligations as detailed in the MTW Certifications of Compliance. MTW PHAs must continue to adhere to all Federal, State, and local fair housing and civil rights obligations including those detailed in the MTW Certifications of Compliance.

Please describe the justification for any “Non-MTW Adjustments” given above:

No adjustments have been made to the baseline. In 2024, BHP added 14 Tenant Protection Vouchers to replace the 14 units of PH that were approved for disposition.

MIX OF FAMILY SIZES SERVED (in Plan Year)				
FAMILY SIZE	BASELINE MIX PERCENTAGE**	NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR^	PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR^^	PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR
1 Person	49%	528	56%	6.49%
2 Person	17%	179	19%	1.40%
3 Person	9%	107	11%	2.22%
4 Person	12%	69	7%	-4.78%
5 Person	9%	36	4%	-5.67%
6+ Person	3%	32	3%	0.35%
<b>TOTAL</b>	<b>100%</b>	<b>951</b>	<b>100%</b>	<b>102%</b>

- \*\* The “Baseline Mix Percentage” figures given in the “Mix of Family Sizes Served (in Plan Year)” table should match those in the column of the same name in the “Baseline Mix of Family Sizes Served (upon entry to MTW)” table.
- ^ The “Total” in the “Number of Households Served in Plan Year” column should match the “Actual Total” box in the “Actual Number of Households Served in the Plan Year” table in Section II.B.i. of this Annual MTW Report.
- ^^ The percentages in this column should be calculated by dividing the number in the prior column for each family size by the “Total” number of households served in the Plan Year. These percentages will reflect adjustment to the mix of families served that are due to the decisions of the MTW PHA. Justification of percentages in the current Plan Year that vary by more than 5% from the Baseline Year must be provided below.

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

The total numbers in this table do not match the total number of households served in Plan Year as that table includes the Special Purpose Vouchers and our baseline numbers do not. BHP has not made any decisions to directly affect the changes to the mix of families served. New households are admitted to the Housing Choice Voucher program based on a lottery system.

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

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

MTW ACTIVITY NAME/NUMBER	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY*	MTW PHA LOCAL DEFINITION OF SELF SUFFICIENCY
2013-3 Partnership with SPAN	1	Moving to market rate or homeownership
2016-1 Flat tier rent for work able families	6	Moving to market rate or homeownership
2016-2 Rent reform for elderly and persons with disabilities households	0	Moving to market rate or homeownership
2016-4 Bringing School Home Referral Process	0	Moving to market rate or homeownership
	0	<i>(Households Duplicated Across MTW Activities)</i>

**Total Households Transitioned to Self Sufficiency**

7

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

### III. PROPOSED MTW ACTIVITIES

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

### IV. APPROVED MTW ACTIVITIES

#### IMPLEMENTED ACTIVITIES

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##### ACTIVITY 2012–4

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

Activity 2012–4, Rent Simplifications for all Households, was approved and implemented in 2012. BHP implemented the asset limitation as defined by HOTMA in September 2024

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

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

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

This was not a rent reform activity and no hardship policy required. However, an exception policy was created in relation to the asset limit upon admission. If households qualify for the exception based on five criteria, they are allowed admission to the program. The five criteria include: 1) household is classified as elderly or a person with a disability; 2) they do not own any real estate; 3) the assets only include money in a bank account (savings, money market, etc.); 4) they plan to use the asset for assisted living in the future; and 5) they are currently living on no income or a fixed income. Prior to September 2024 and the implementation of the HOTMA asset limitation, 1 (one) household was denied admission for having total assets valuing more than \$50,000, the household did not qualify for the exception. There were 143 new admissions to the Housing Choice Voucher Program (zero to the public housing program). With the implementation of the HOTMA limit, the exception policy has been removed as of September 1, 2024.

c. ACTUAL NON-SIGNIFICANT CHANGES

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

d. ACTUAL SIGNIFICANT CHANGES

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

ACTIVITY 2012–5

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

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

b. DESCRIPTION/IMPACT/UPDATE

The goal of this activity is to increase rental choices to Housing Choice voucher holders by eliminating the cap of 40% of income towards rent when participants initially lease up in a unit. In 2024, 9 families rented a unit where their portion of the rent was more than 40%. The average rent burden for these families is 47%, with a range of 41% to 55%. Since implementation of this activity in 2012, we have had a total of 146 households lease up with a rent burden being more than 40%. When households choose to do this, they sign an agreement confirming their understanding that loss of housing assistance will occur if they are evicted for non-payment of rent. Not one household has lost their assistance since this choice has been offered.

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

c. ACTUAL NON-SIGNIFICANT CHANGES

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

d. ACTUAL SIGNIFICANT CHANGES

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

ACTIVITY 2012–6

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

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

**b. DESCRIPTION/IMPACT/UPDATE**

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

**c. ACTUAL NON-SIGNIFICANT CHANGES**

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

**d. ACTUAL SIGNIFICANT CHANGES**

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

**ACTIVITY 2013–1**

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

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

**b. DESCRIPTION/IMPACT/UPDATE**

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

**c. ACTUAL NON-SIGNIFICANT CHANGES**

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

**d. ACTUAL SIGNIFICANT CHANGES**

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

**ACTIVITY 2013–2**

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

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

**b. DESCRIPTION/IMPACT/UPDATE**

The activity ensures that all Housing Choice Voucher participants are contributing towards their rental payment (or at a minimum to ensure that residents and participants are not receiving payments to live on housing assistance). Households who were receiving a utility reimbursement payment (URP) in April 2013 continued to receive one through March 2014, unless there was a change in their circumstances that resulted in no URP. No new instances of URP were allowed after April 1, 2013. Households met with their Voucher Specialist within the first three months of implementation. Reminders with information on utility use and grants were sent in October 2013 and January 2014. There were 12 households who were still receiving URP as of March 31, 2014, and it was eliminated as of as of April 1, 2014, when the hardship ended.

**c. ACTUAL NON-SIGNIFICANT CHANGES**

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

**d. ACTUAL SIGNIFICANT CHANGES**

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

**ACTIVITY 2013–3**

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

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

**b. DESCRIPTION/IMPACT/UPDATE**

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

On January 1, 2024, eight families were actively participating in this program. Over the year, two families graduated and moved on without voucher assistance. One family entered the program during 2024. One application was being processed at the end of the year. As of December 31, 2023, there were seven families participating. Four families are eligible to graduate.

**c. ACTUAL NON-SIGNIFICANT CHANGES**

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

d. ACTUAL SIGNIFICANT CHANGES

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

ACTIVITY 2013–4

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

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

b. DESCRIPTION/IMPACT/UPDATE

This activity allows BHP to use Replacement Housing Factor (RHF) Funds to build other affordable housing units. In 2013, BHP used RHF Funds at 1175 Lee Hill, a 31–unit community for chronically homeless using the Housing First model. Construction began in 2013, with full completion and full occupancy in November 2014. BHP did not use any RHF Funds in 2024.

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

c. ACTUAL NON-SIGNIFICANT CHANGES

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

d. ACTUAL SIGNIFICANT CHANGES

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

ACTIVITY 2015–1

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

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

b. DESCRIPTION/IMPACT/UPDATE

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

This activity is very dependent on available market opportunities. In 2022, BHP used \$2,500,000 to fund new construction of 15 units of senior housing. These units will be project-based vouchers and assist senior (age 62+) households who are chronically homeless. The



project, Hilltop (formerly known as Mount Calvary), will consist of 60 total units. Construction began in early 2023 and was completed in late January 2025.

In 2023, BHP used \$700,000 (\$500,000 of capital funds and \$200,000 of Demolition/Disposition Transition Funds) to fund new construction of Rally Flats. There will be a total of 100 units (one and two bedrooms), of which 10 will have a project-based voucher attached. Construction began in late 2023, with completion anticipated for mid 2025.

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

**c. ACTUAL NON-SIGNIFICANT CHANGES**

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

**d. ACTUAL SIGNIFICANT CHANGES**

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

**ACTIVITY 2016–1**

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

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

**b. DESCRIPTION/IMPACT/UPDATE**

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

- *Flat tiered rent system*: total tenant payment is calculated using a two-step system. The family size and gross income place the family into an income tier. The income tier and the size of the unit determine the total tenant payment for the family. From this amount, if applicable, the utility allowance is subtracted, a flat fee per ineligible family member is added, and any amount the gross rent exceeds the payment standard is added.
- *Minimum rent*: the minimum rent is based on bedroom size and ranges from \$120 for a zero bedroom to \$180 for a four bedroom.
- *Biennial recertification*: households are recertified every two years.

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

There were two different hardship cases for this activity.

- *Maximum rent increases*: In 2017, all hardships for this group of work-able families were discontinued due to experiencing a change in family composition, income, contract rent increases, moving from one unit to another, or leaving the program. No further hardships were granted for this group.
- *No interim recertification*: In 2024, we received 8 requests for an interim recertification due to loss of income. Of these 9 requests, 5 were approved for an interim to be processed and their rent portion was adjusted accordingly. Of the 4 that were denied, 2 families were referred to the Safety Net Program and received multi-month assistance in the amount of \$3,000. The other 2 families were not referred to the fund, as one was a case of unreported income, and the other had no extenuating circumstances that warranted the need to be referred. The Safety Net Program was created in 2014, and funded with \$25,000. In 2024, an additional \$25,000 was given to the Emergency Family Assistance Association to replenish the fund. As of December 31, 2024, there is a balance of \$22,520 remaining.

The average rent burden for families in 2024 is 32% with an average income of \$33,646. Six families increased their income to the point where they were able to pay the full contract rent. They were removed from the program after the 180-day safety net.

#### C. ACTUAL NON-SIGNIFICANT CHANGES

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

d. ACTUAL SIGNIFICANT CHANGES

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

ACTIVITY 2016–2

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

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

b. DESCRIPTION/IMPACT/UPDATE

This activity is a simplified rent structure for households who are elderly and/or persons with disabilities and includes these elements:

- rent based on 26.5% of gross income
- triennial recertification
- income disregard
- a limit on interim decreases
- flat fee of \$125 per ineligible family member per month

The hardship capped their rent increase at 7% provided all other variables (such as income, contract rent, utility allowance, etc.) remained the same. As of December 31, 2024, there are two households who continue to receive the hardship. One household lost the hardship when the increase in income was more than the hardship allowed.

c. ACTUAL NON-SIGNIFICANT CHANGES

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

d. ACTUAL SIGNIFICANT CHANGES

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

## ACTIVITY 2016–3

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

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

### b. DESCRIPTION/IMPACT/UPDATE

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

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

Fifty new landlords began participation in 2024 (one landlord declined the incentive payment), for a total of \$9,800 paid in incentives.

In 2018, the Damage Claim Fund was expanded with our regional partners to include all voucher holders within Boulder County and renamed the Landlord Assurance Fund. There are four agencies within Boulder County that administer vouchers (Boulder Housing Partners, Boulder County Housing Authority, Longmont Housing Authority and Mental Health Partners – contract administrator for the Colorado Division of Housing vouchers). It is funded by Boulder County, the City of Boulder, the City of Longmont, and the Housing Authorities. In 2024, we received four claims for reimbursement. All four claims were for vouchers not funded through the MTW designation but were paid out of the local fund.

In 2024, we received five applications for the Security Deposit Loan fund, one was cancelled by the applicant. Four were approved for a total of \$2,550. All other paybacks are on schedule to be paid back on time.

The fourth element, Moving with Continued Assistance, was implemented in 2016. During 2024, we had 144 requests to move, and 129 households were complying. Of these 129:

- 94 moved with a voucher
- 14 ported their voucher outside of Boulder County
- 10 stayed in place

- 5 gave up their voucher
- 6 were still searching as of 12/31/24

Thirteen households were asked to come into compliance prior to being able to move with continued assistance. Of these 13:

- 2 came into compliance and moved
- 3 stayed in place
- 7 were terminated from the program due to non-compliance
- 1 gave up their voucher

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

**c. ACTUAL NON-SIGNIFICANT CHANGES**

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

**d. ACTUAL SIGNIFICANT CHANGES**

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

**ACTIVITY 2016–4**

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

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

**b. DESCRIPTION/IMPACT/UPDATE**

Activity 2016-4, Bringing School Home Referral Process, is the first step in our bigger program, Bringing School Home, which is designed to positively disrupt factors working against the success of children. This activity allows us to bring families with children aged 0 to 5 into four of our sites where services are offered through the Bringing Home School Program. In 2024, 26 families entered the program. The families agree to accept services with the goal of children being kindergarten ready, succeed in school, and eventually be self-sufficient.

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

**c. ACTUAL NON-SIGNIFICANT CHANGES**

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

d. ACTUAL SIGNIFICANT CHANGES

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

ACTIVITY 2018-1

a. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

Activity 2018-1 Project Based Waivers was a consolidation of all the previous project-base voucher waivers from activities 2012-1, 2014-6 and 2015-2 into one activity, and introduced three new elements. This activity was approved and implemented in 2018. In 2024, we amended one element of the activity and implemented a new element, as described below.

b. DESCRIPTION/IMPACT/UPDATE

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

- *Waive the 20% cap on project-based vouchers* – allows BHP to project base more than 20% of our voucher authority.
- *Definition of excepted units* – allows BHP to project base vouchers at 100% of the units in advance of offering services.
- *Waive the competitive bidding process* – waives this requirement when BHP is placing vouchers in a project owned by BHP.
- *Rent limits and rent reasonableness* – allows BHP to establish appropriate rent limits and conduct our own rent reasonableness tests for our project-based voucher contracts, using data gathered from market studies, Fair Market Rents, current market comparisons, and average rents.
- *Allow owner/service partner to hold wait list* – allows the owner or the service partner at all project-based voucher sites to hold the wait list and refer participants to BHP’s Housing Choice Voucher Department.
- *Allow BHP staff to conduct Housing Quality Standards inspections at our PBV units* – allows in-house staff that has been certified in Housing Quality Standards to conduct inspections at BHP-owned properties.
- *Allow participant families to continue to pay rent according to their income* – allows families to stay in place at a project-based voucher community and pay rent according to their income when it exceeds the contract rent that has been set under the contract.
- *Amended in 2024: Move up strategy for project-based voucher households (formerly known as Allow participants who are no longer receiving housing assistance payments to remain on the voucher)* – allows families to stay on the voucher program even when their portion of rent is higher than the contract rent, but only until their household income reaches 60% of the Area Median Income. This also allows them to be eligible for the next available voucher if assistance would allow them to live in the

private rental market. When they reach the 60% limit, they are issued a voucher and asked to move from the unit with a voucher, if they find a unit where assistance would be paid on their behalf. No families reached this limit in 2024.

- **New in 2024: *Next available voucher rule*:** BHP has extended the time that project-based voucher holders can request the next available voucher to 36 months of residency. In 2024, we received 18 requests for the next available voucher, all of which were approved. Eight families have moved out, 5 ported out of our jurisdiction, 4 families cancelled their move and stayed in place, and one is still searching for a new unit.

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

At the end of 2024, we had 27 families who would have graduated from the program and asked to move without rental assistance due to increases in income that allowed them to pay the entire contact rent. Under this change, all 27 households stayed in place, continue to be eligible for the next available voucher and pay rent according to their income.

#### c. ACTUAL NON-SIGNIFICANT CHANGES

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

#### d. ACTUAL SIGNIFICANT CHANGE

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

### ACTIVITY 2020-1

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

Activity 2020-1 was proposed in our 2020 Plan and approved by HUD in 2020. This activity was fully implemented in 2021. The delay was due to the pandemic and there was not enough time to focus on software system upgrades for this to work properly.

#### b. DESCRIPTION/IMPACT/UPDATE

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

In 2024, the escrow calculation was adjusted. The amounts based on earned income were increased for years 3 – 5. Goals were added to the list of goals achieved that have a corresponding escrow deposit each year while participating in the program.

Beginning in 2020, all new families admitted to the program have their rent and escrow calculated in this way. Existing families were grandfathered in and allowed the option to opt into the new rent and escrow calculations as of their June 2020 annual recertification. No families opted in during 2024. During 2024, the remaining family that had been grandfathered into the program graduated from the program. All families are now under this rent and escrow calculation.

Six families entered the program in 2024. Regularly scheduled recertifications are every two years. Escrow can be earned beginning at the one-year anniversary of entering the program.

Nine families left the program over the course of the year. Four families graduated from FSS, two moved with a voucher and two left without voucher assistance. Three of the families received escrow, total escrow paid out was \$26,370.26. Four families voluntarily left the program, and one was terminated from the program.

As of December 31, 2024, there are 31 families in the program. The total escrow balance for these families as of December 31, 2024 is \$28,059. Thirteen families recertified in 2024 and are receiving monthly escrow based on earned income included in the rent calculation. Sixteen goals (for a total of \$6,616) were achieved that resulted in an escrow deposit, including one who graduated from the program and bought a home.

In 2024, BHP, in partnership with Boulder County, committed to community empowerment through the FSS program, which resulted in expanding the FSS program to households living in BHP project-based voucher communities who are already participating in the Bringing School Home program. In 2024, we enrolled an additional 11 households. BHP will continue to expand this initiative to serve more families living in deeply affordable housing communities who are a part of the Bringing School Home program. Together we're fostering a culture of growth and self-reliance, empowering families to achieve their dreams of self-sufficiency.

**c. ACTUAL NON-SIGNIFICANT CHANGES**

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

**d. ACTUAL SIGNIFICANT CHANGE**

No changes have been made to this activity.



## **ACTIVITIES NOT YET IMPLEMENTED**

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

## **ACTIVITIES ON HOLD**

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

## **CLOSED OUT ACTIVITIES**

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### **ACTIVITY 2012–1**

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

### **ACTIVITY 2012–2**

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

### **ACTIVITY 2012–3**

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

### **ACTIVITY 2012–7**

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

### **ACTIVITY 2014–1**

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

### **ACTIVITY 2014–2**

MTW Activity 2014–2: Rent Reform for Public Housing Work-able Families was never implemented. With the conversion of 6 of the 8 public housing sites (85% of the units) under Section 18 disposition and RAD in 2015, the households were transitioned to the voucher program. This activity was approved in 2014 but never implemented due the decrease in the number of work-able families in the public housing units, and the goal BHP has of converting the final 49 public housing units to the Housing Choice Voucher program.

### **ACTIVITY 2014–3**

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

### **ACTIVITY 2014–4**

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

### **ACTIVITY 2014–5**

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

### **ACTIVITY 2014–6**

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

**ACTIVITY 2015-2**

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

# V. PLANNED APPLICATION OF MTW FUNDS

## A. FINANCIAL REPORTING

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

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

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

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

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

The MTW PHA shall provide a thorough narrative of actual activities that use only the MTW funding flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (IV) of the Annual MTW Report.

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

## B. LOCAL ASSET MANGEMENT PLAN

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

Yes

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

No

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

No

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

N/A

## VI. ADMINISTRATIVE

### A. REVIEWS, AUDITS, AND INSPECTIONS

In 2024, no audits or inspections were conducted.

### B. EVALUATION RESULTS

Currently, there are no active evaluations outside of annual monitoring of all MTW Activities.

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

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