

Streamlined Annual PHA Plan (HCV Only PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 09/30/2027
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services. They also inform HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-, very low-, and extremely low- income families.

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers (HCVs) and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, SEMAP for PHAs that only administer tenant-based assistance and/or project-based assistance, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or HCVs combined and is not PHAS or SEMAP troubled.

A. PHA Information.	
A.1	PHA Name: <u>Boulder Housing Partners</u> PHA Code: <u>CO016</u> PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2027</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) <u>1,005 HCVs + 13 5 RAD PBVs +</u> PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission Public Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans. All of the plan elements and attachments are available on our website at www.boulderhousing.org. A hard-copy is available at the main office located at 4800 Broadway, Boulder, CO 80304. Information about the Housing Choice Voucher Program can be found at www.boulderhousing.org. For further questions regarding this plan or the Housing Choice Voucher Program, please email hcv@boulderhousing.org or call 720-564-4630.

B.2	New Activities. (a) Does the PHA intend to undertake any new activities related to the following in the PHA's applicable Fiscal Year? Y N ☒ ☐ Project-Based Vouchers (b) If Project-Based Voucher (PBV) activities are planned for the applicable Fiscal Year, provide the projected number of PBV units and general locations, and describe how project-basing would be consistent with the PHA Plan. See attachment B.2.
B.3	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan. BHP continues to make progress in meeting our Missions and Goals as described in Attachment B.3.

B.4	Capital Improvements. – Not Applicable
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N N/A ☒ ☐ ☐ (b) If yes, please describe: An audit finding involving the timing of notices to landlords for failed inspections was found in the FY 2025 audit. This was corrected in December 2025.
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y N ☒ ☐ (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. A public hearing will be held on August 20, 2026, and the RAB Meeting will be held on August 25, 2026. There were 6 Participants who attended in person, and 5 Participants who attended remotely via Zoom for the public hearing on August 20, 2026, and 0 participants at the TRAB meeting on August 25, 2026. See attachment C.1.

C.2	Certification by State or Local Officials. Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y ☐ N ☒ (b) If yes, include Challenged Elements.

Instructions for Preparation of Form HUD-50075-HCV Annual PHA Plan for HCV-Only PHAs

A. PHA Information. All PHAs must complete this section (24 CFR 903.4).

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **Number of Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Public Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. Note: The number of HCV's should include all special purpose vouchers (e.g. Mainstream Vouchers, etc.) (24 CFR 903.23(e)).

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table (24 CFR 943.128(a)).

B. Plan Elements. All PHAs must complete this section (24 CFR 903.11(c)(3)).

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no."

☐ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR 903.7(a)(2)(i)). Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy (24 CFR 903.7(a)(2)(ii)).

☒ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV (24 CFR 903.7(b)).

☐ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program and state the planned use for the resources (24 CFR 903.7(c)).

☐ **Rent Determination.** A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies (24 CFR 903.7(d)).

☒ **Operation and Management.** A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA (24 CFR 903.7(e)).

☐ **Informal Review and Hearing Procedures.** A description of the informal hearing and review procedures that the PHA makes available to its applicants (24 CFR 903.7(f)).

☐ **Homeownership Programs.** A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval (24 CFR 903.7(k)).

☐ **Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.** A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA's partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA's partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) and under requirements for the Family Self-Sufficiency Program and others. Include the program's size (including required and actual size of the FSS program) and means of allocating assistance to households. (24 CFR 903.7(l)(i)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements (24 CFR 903.7(l)(iii)).

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan (24 CFR 903.7(s)(2)(i)).

☐ **Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan (24 CFR 903.7(s)(2)(ii)).

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the applicable Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☒ **Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 24 CFR 983.55(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations (including if PBV units are planned on any former or current public housing units or sites), and describe how project-basing would be consistent with the PHA Plan (24 CFR 903.7(b)(3), 24 CFR 903.7(r)).

- B.3 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan (24 CFR 903.11(c)(3), 24 CFR 903.7(s)(1)).
- B.4 Capital Improvements.** This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs.
- B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided (24 CFR 903.7(p)).

C. Other Document and/or Certification Requirements.

- C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations (24 CFR 903.13(c), 24 CFR 903.19).
- C.2 Certification by State or Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan (24 CFR 903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of 24 CFR 5.150 *et seq.*, 24 CFR 903.7(o)(1), and 24 CFR 903.15.
- C.4 Challenged Elements.** If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public (24 CFR 903.23(b)).

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 4.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 *et seq.*, and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

Other Policies that Govern Eligibility, Selection, and Admissions. A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. (24 CFR §903.7(b))

Other admissions policies. The PHA's admission policies that include any other PHA policies that govern eligibility, selection, and admissions for the public housing (see part 960 of this title), tenant-based assistance (see part 982, subpart E of this title), and project-based assistance (see part 982, subpart E of this title except as provided in § 983.3, and part 983, subpart F) programs. (The information requested on site-based waiting lists and deconcentration is applicable only to public housing.)

Administrative Plan for Boulder Housing Partners' Housing Choice Voucher Program, Chapter 4, Applications, Waiting List and Tenant Selection Plan.

PART III: SELECTION FOR HCV ASSISTANCE 4-

III.A. OVERVIEW

As vouchers become available, applicants on the lottery or wait list must be selected for assistance in accordance with the policies described in this section.

The order in which applicants are selected from the lottery or wait list depends on the selection method chosen by the PHA and is impacted in part by any selection preferences for which the family qualifies. The availability of targeted funding may also affect the order in which families are selected from the lottery.

The PHA must maintain a clear record of all information required to verify that the family is selected according to the PHA's selection policies [24 CFR 982.204(b) and 982.207(e)].

4-III.B. SELECTION AND HCV FUNDING SOURCES

Special Admissions [24 CFR 982.203]

HUD may award funding for a specific category of families living in specified types of units (e.g., a family that is displaced by demolition of public housing; a non-purchasing family residing in a HOPE 1 or 2 project). In these cases, the PHA may admit such families whether or not they are in the lottery or on a wait list, and, if they are in the lottery or on a wait list, without considering the family's position in the lottery/wait list. These families are considered non-waiting list selections. The PHA must maintain records showing that such families were admitted with special program funding.

Targeted Funding [24 CFR 982.204(e)]

HUD may award a PHA funding for a specified category of families. The PHA must use this funding only to assist the families within that specified category. In order to assist families within a targeted funding category, the PHA may skip families that do not qualify within the targeted funding category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

BHP Policy

The PHA administers the following types of targeted funding:

Non-Elderly Disabled (NED) – 181– vouchers specifically for those who are young and disabled and are no longer eligible for certain developments (see Chapter 20 for further details)

Mainstream Voucher Program – 188 vouchers specifically for households with persons with disabilities and who are (see Chapter 20 for further details):

- Transitioning out of institutional or other segregated settings;
- At serious risk of institutionalization;
- Homeless; or
- At risk of becoming homeless; or
- Move-On options for current Permanently Supportive Housing participants (for 2020 award of vouchers only)

Housing Choice Voucher Participants who qualify for any of these targeted fundings must also qualify for the local preference and comply with the same family obligations as all HCV participant households.

Regular HCV Funding

Regular HCV funding may be used to assist any eligible family in the lottery or wait list. Families are selected from the lottery or wait list according to the policies provided in Section 4-III.C.

4-III.C. SELECTION METHOD

PHAs must describe the method for placing applicant families in the lottery or on the wait list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

Local Preferences [24 CFR 982.207; HCV p. 4-16]

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

BHP Policy

The PHA will use the following preferences for the tenant-based voucher lottery:

Preference #1 - The PHA will offer a preference to any family that has been terminated or their voucher frozen (after being issued, prior to being placed in use) from its HCV program due to insufficient program funding. (This preference will take priority over all other preferences.)

Preference #2 - The PHA will give priority to households who are:

- o Single-person households who are elderly (62 years of age or older)
- o Single-person households who are a person with a disability
- o Families with dependent children

And who meet at least one of the following:

- Household lives within Boulder County
- An adult member of the household works at least 20 hours per week within Boulder County
- An adult member of the household is homeless within Boulder County and receiving services through an agency within Boulder County
- Households with an adult child or parent who resides in Boulder County. In this instance, either the applicant household must be, or the immediate family member

living in Boulder County must be, a senior over the age of 62 or a person with a disability.

- Families that include victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking who have either been referred by a

partnering service agency or consortia or are seeking an emergency transfer under VAWA from the other covered housing program operated by the PHA.

The PHA will work with the following partnering service agencies:

Safehouse Progressive Alliance for Non-Violence

The applicant must certify that the abuser will not reside with the applicant unless the PHA gives prior written approval.

Preference #3 – The PHA will give priority to households who are:

- o Single-person households who are elderly (62 years of age or older)
- o Single-person households who are a person with a disability
- o Families with dependent children

And who meet at least one of the following:

- Live outside of Boulder County, but within the State of Colorado

Preferences for project-based voucher communities:

In addition to the local preference, applicants on the project-based voucher wait list will be given preference based on the community.

For Holiday and Lee Hill, applicants must be chronically homeless as defined by HUD's Continuum of Care Program and selected through Metro Denver Homeless Initiatives Coordinated Entry System (OneHome)

For 30Pearl, preference will be given to persons with disabilities who will benefit from the services offered to individuals with intellectual and developmental disabilities.

For the family sites (Broadway East, Diagonal Court, Iris Hawthorn, Kalmia, Manhattan, and Madison), preference will be given to families with at least one child under the age of six (6).

For Madison (one-bedroom units), applicants must be 62 years or older or individuals with a disability.

For Woodlands, preference will be given to families who will participate in the Family Self Sufficiency Program.

For Northport and Walnut Place, applicants must be 55 years of age and older. Applicants for certain designated units must also have a homeless preference (up to 20 units among Manhattan, Northport, and Walnut Place).

For Hilltop, applicants must be 62 years of age and older and have a homeless preference.

For Hawthorn Court and Rally Flats, applicants must have a homeless preference. Homeless preference is defined as:

- Any individual or family who lacks a fixed, regular, and adequate night-time residence.
- Any individual or family who will imminently lose their primary night-time residence within 14 days and no subsequent residence has been identified, and they lack the resources needed to obtain other permanent housing.

Any individual or family who has no other residence, is fleeing or is attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and lacks the resources needed to obtain other permanent housing.

Other preferences

Disaster Emergency Preference –BHP will give a priority preference for families affected by a local natural disaster. Local disasters include fire, flood, hurricane, earthquake, or tornado which cause the applicant's current housing to be considered uninhabitable as verified by local, state, or federal authorities within the last six months. Local is defined as within the confines of Boulder County.

Priority for the Disaster Emergency Preference will be given in the following order:

First priority: current BHP residents affected by the disaster

Second priority: others displaced by disaster (who also meet other eligibility requirements.)

Priority means those affected by the disaster will be allowed to apply for housing assistance even if the lottery is closed and receive this emergency preference. These families will have preference over the applicants on the current lottery or wait list and will remain at the top of the list for assistance for a period of six months from the date of the disaster. If at the end of the six-month period no assistance has become available, their application will be removed from the lottery or wait list. Assistance will be limited to the availability of vouchers or units in each of the programs and will reflect the nature and extent of the disaster. The Board of Commissioners will determine, at its next regular meeting following the disaster, or sooner if needed, the extent of housing assistance to be allocated to the victims. Based on the severity of the natural disaster and the number of families affected, the Board will have discretion to approve the number of families who would qualify for this preference.

Emergency Housing Vouchers – Once funding from HUD is no longer available for the Emergency Housing Vouchers, preference will be given for any currently assisted EHV household still needing voucher assistance, provided there is sufficient funding in the regular HCV program.

Income Targeting Requirement [24 CFR 982.201(b)(2)]

HUD requires that extremely low-income (ELI) families make up at least 75 percent of the families admitted to the HCV program during the PHA's fiscal year. ELI families are those with annual incomes at or below the federal poverty level or 30 percent of the area median income, whichever number is higher. To ensure this requirement is met, a PHA may skip non-ELI families in order to select an ELI family.

Low-income families admitted to the program that are "continuously assisted" under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to

the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

BHP Policy

The PHA will monitor progress in meeting the income targeting requirement throughout the fiscal year. Extremely low-income families will be selected ahead of other eligible families on an as-needed basis to ensure the income targeting requirement is met.

Order of Selection

The PHA system of preferences may select families based on local preferences according to the date and time of application, or by a random selection process [24 CFR 982.207(c)]. If a PHA does not have enough funding to assist the family at the top of the lottery or wait list, it is not permitted to skip down through the lottery or wait list to a family that it can afford to subsidize when there are not sufficient funds to subsidize the family next in the lottery or on the wait list [24 CFR 982.204(d) and (e)].

BHP Policy

Once the lottery has closed, applicants who claim a preference #2, or qualify for targeted funding will be placed into the lottery. Documentation will be maintained by the PHA as to whether families in the lottery qualify for and are interested in targeted funding. If a higher placed family is not qualified or not interested in targeted funding, there will be a notation maintained so that the PHA does not have to ask higher placed families each time targeted selections are made.

From this group of applicants, a specific number of applicants will be randomly selected based on the number of vouchers the PHA believes will have available over the next 12 months. Applicants who were randomly selected will be placed on the wait list and processed in smaller groups as vouchers become available.

For the project-based voucher wait list, applicants will be selected based on time and date of application and claimed preference, if applicable. For the Non-Elderly Disabled and Mainstream Vouchers, applicants may be selected out of order based on this preference when these vouchers become available.

Upon expiration of funding for the Emergency Housing Vouchers, any current household on the program will be selected first over all other applicants.

4-III.D. NOTIFICATION OF SELECTION

When a family has been selected from the lottery or wait list, the PHA must notify the family [24 CFR 982.554(a)].

BHP Policy

Once the randomized lottery is conducted, the randomly selected lottery numbers will be posted to the PHA's website and the front door of the PHA offices. Applicants will need to verify if their number has been randomly selected.

For the lottery, the first step in the eligibility process is to verify the preference that the family has claimed on their initial application for the lottery. (see Chapter 7). If the

family is verified as eligible for that preference (both at the time of application and determining eligibility), the PHA will continue to process the application. If the family was selected from the lottery and is determined not eligible for the preference for which they were selected from the lottery, the family will be removed from the lottery.

When vouchers are available, applicants will be placed into smaller groups to process. A letter (and an email if provided by the household) will be sent to the applicant to explain the next steps. For the project-based voucher wait list, applicants will be notified of their selection when they are invited to an intake interview for the eligibility determination process.

4-III.E. THE ELIGIBILITY DETERMINATION PROCESS

HUD recommends that the PHA obtain the information and documentation needed to make an eligibility determination through a face-to-face interview with a PHA representative [HCV GB, pg. 4-16]. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met.

However, if the PHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place in the lottery for a period of time determined by the PHA [Notice PIH 2018-24].

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability.

BHP Policy

Applicants selected from the lottery and/or list are required to attend an intake interview. Notice will be sent via mail and email (if an email address has been provided by the applicant). The notice will inform the family of the following:

Date, time, and location of the intake interviews (applicants must call to schedule an interview)

Who must attend the interview

All documents that must be provided at the intake interview, including information about what constitutes acceptable documentation

Documents that must be provided at the meeting to document eligibility for a preference, if applicable

The head of household and the spouse/co-head will be strongly encouraged to attend the interview together. However, either the head of household or the spouse/co-head may attend the meeting on behalf of the family. Verification of information pertaining to adult members of the household not at the meeting will not begin until signed release forms are returned to the PHA.

The head of household or spouse/co-head must provide acceptable documentation of legal identity. (Chapter 7 provides a discussion of proper documentation of legal identity). If the family representative does not provide the required documentation at the time of the meeting, they will be provided with a checklist stating the documents that are required to be submitted with a deadline for submission.

The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, complete required forms, provide required signatures, and submit required documentation. The applicant will be provided with a checklist stating any documents that are required to be submitted, along with a deadline for the submission of those documents. If any materials are missing after the deadline provided on the checklist during the intake interview, the application will be inactivated.

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

Interviews will be conducted in English. For applicants who may require language assistance, the PHA will encourage families to bring an advocate, family member, friend, or other adult representative to assist in communications. The PHA will also utilize available resources such as bilingual staff, community volunteer resources, responsible use of artificial intelligence technology, and/or machine translation to assist families with communication.

If the applicant does not schedule and attend the intake interview, the application will be inactivated and removed from the lottery without further notice.

If the family is unable to attend an intake interview, the family should contact the PHA at least 24 hours in advance to schedule a new interview. The PHA will only reschedule if contacted in advance by the family. Applicants who fail to attend the scheduled interview(s) without PHA approval will have their applications made inactive without further notice based on the family's failure to supply information needed to determine eligibility.

If a notification letter is returned to the PHA undeliverable or the family does not respond to the letter, the family will be removed from the lottery without further notice. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination; therefore, no informal review will be offered.

4-III.F. COMPLETING THE APPLICATION PROCESS

The PHA must verify all information provided by the family (see Chapter 7). Based on verified information, the PHA must make a final determination of eligibility (see Chapter 3) and must confirm that the family qualified for any special admission, targeted funding admission, or selection preference that affected the order in which the family was selected from the lottery or wait list.

BHP Policy

If the PHA determines that the family is ineligible, the PHA will send written notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for the determination and will inform the family of its right to request an informal review (Chapter 16).

If a family fails to qualify for any criteria that affected the placement into the lottery or their place on the wait list (i.e. claimed preference, targeting funding, extremely low-income), the family will be removed from the lottery, or returned to the correct position on the wait list. The PHA will notify the family in writing that they have been removed from the lottery, or returned to the correct position on the wait list, and will specify the reasons for it.

If the PHA determines that the family is eligible to receive assistance, the PHA will invite the family to attend a briefing in accordance with the policies in Chapter 5.

For Project-Based Voucher applicants, they will be offered a unit and invited to attend a briefing. If they refuse the first unit, they will be allowed to remain on the wait list and be offered a second unit. After the applicant refuses the second unit, their applicant will

be inactivated and removed from the wait list, unless the refusal is for good cause. There will be one final offer if approved to stay on the list for refusal based on good cause.

The PHA defines good cause as:

- The family determines the unit is not accessible to a household member with a disability or otherwise does not meet the member's disability related needs;
- The family is unable to accept the offer due to circumstances beyond the family's control (such as hospitalization, temporary economic hardship, or natural disaster); and
- The family determines the unit presents a health or safety risk to a household member who is or has been a victim of do

Operation and Management. A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (24 CFR §903.7(e)).

(e) *A statement of the PHA's operation and management.*

- (1) This statement must list the PHA's rules, standards, and policies that govern maintenance and management of housing owned, assisted, or operated by the PHA.
- (2) The policies listed in this statement must include a description of any measures necessary for the prevention or eradication of pest infestation. Pest infestation includes cockroach infestation.
- (3) This statement must include a description of PHA management organization, and a listing of the programs administered by the PHA.
- (4) The information requested on a PHA's rules, standards and policies regarding management and maintenance of housing applies only to public housing. The information requested on PHA program management and listing of administered programs applies to public housing, tenant-based assistance, and project-based assistance.

Boulder Housing Partners no longer owns any Public Housing Units. The Public Housing Program has not been closed out, as BHP will utilize the 230 Restore/Rebuild vouchers allocated to us.

Please see the current organizational chart for reference for PHA Management. Boulder Housing Partners includes the following programs:

- Housing Choice Voucher Program
 - 824 MTW Housing Choice Vouchers
 - 181 Non-Elderly Disabled Vouchers
 - 188 Mainstream Vouchers
 - 135 Rental Assistance Demonstration Vouchers
 - 22 Emergency Housing Vouchers
 - 48 locally funded rental assistance vouchers for chronically homeless households
 - Continuum of Care Grant provides rental assistance for 22 households, supportive services for 63 households and operating costs for one 31-unit building

- Property Management Operations
 - 116 HUD Multi-Family Units under the Project Based Rental Assistance Contracts Program in Low Income Housing Tax Credit Program
 - 549 Affordable Units
 - 1,435 Low Income Housing Tax Credit units



B.2. New Activities

Project-Based Vouchers: provide the projected number of PBV units and general locations, and how project-basing would be consistent with the PHA Plan.

BHP plans to utilize Restore/Rebuild vouchers for the following projects in the BHP development pipeline.

- **Harvest34:** This project is 44 units of family housing that received an award of Low-Income Housing Tax Credits from the Colorado Housing and Finance Authority. More specific information is listed below and in the Mixed Finance Development Proposal (form HUD-50156) that is available upon request. BHP intends to close on this project in the fall of 2026 with conversion to RAD in early 2028. BHP intends to use the Low-Income Housing Tax Credit program paired with Restore/Rebuild vouchers to advance construction of much needed, deeply affordable housing. BHP has requested a NARR for this project.
- **Alpine Balsam Project:** 144 future units located in central Boulder at 1100 Balsam, Boulder, CO 80304. The project is to be constructed in two phases starting in late 2027. Phase 1 of Alpine Balsam is a 55-unit older adult age restricted building. Phase 2 will be 89 units of family housing. BHP intends to use the Low-Income Housing Tax Credit program paired with Restore/Rebuild vouchers to advance construction of much needed, deeply affordable housing. BHP has requested a NARR for this project.

Details about the Harvest34 Street Project:

- Conversion Type: Project-Based Vouchers
- Pre-Conversion Total Units: 44
- Post-Conversion RAD PBV Units: 44
- Post-Conversion Unit Type: Family
- Post-Conversion Development: Harvest34
- Name and Address: 3125 34th Street, Boulder, CO 80301
- Post-Conversion Sponsor: Boulder Housing Partners
- Project Description: Harvest34 will be a new construction multifamily development located on land currently owned by Boulder Housing Partners (BHP). Harvest34 will consist of 44 rental units with 48 onsite parking spaces and 88 bike parking spots. The development will be served by the standalone net-zero community center containing a flex-area, kitchenette, restroom, and an office for management and resident services staff. Anticipated resident services include after school and

parent programming, community food sharing, computer lab access, wellness programs, and independent living referrals to other partner service organizations. Additional amenities at the project will include walking paths, a playground, community garden, and access to a nearby public park. Harvest34 will be an all-electric site with a goal of Net Zero Energy, a solar array, electric vehicle charging stations, easy access to public transportation including the provision of free Eco-Passes to residents, and significant water-wise and xeriscape landscaping.

- Bedroom Configuration: ten (10) one-bedroom units, twenty-four (24) two-bedroom units, and ten (10) three-bedroom units.
- Transfer of Assistance: Restore Rebuild
- De Minimus Reduction: N/A
- Transfer of Waiting List: Units will be filled using the separate wait list that covers all PBV projects but is distinct from the tenant-based voucher list. The PHA will manage and maintain the list, including any BHP-approved selection preferences, in accordance with BHP's Housing Choice Voucher Program Administrative Plan. BHP will post information on how to apply for the PBV wait list on the BHP website.

Certification

For the Harvest34 Rental Assistance Demonstration (RAD) project located in Boulder, Boulder Housing Partners certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. The site is suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto; and,
2. In conducting its review of site selection for the proposed project, BHP completed a review with respect to accessibility for persons with disabilities and that the proposed site is consistent with applicable accessibility standards under the Fair Housing Act, Section 504, and the ADA.

BHP also intends to use project-based vouchers at the following developments:

- Broadway Renovation Project: 70-unit renovation project located at 3110, 3120, 3130, 3140, 3150 and 3160 Broadway, Boulder, CO 80304. Currently, there are 44 project-based vouchers that cover all the units at Broadway East. These 44

vouchers will be spread over both Broadway East and West (West consists of 26 units). This work is intended to move forward in 2027.

- Golden West: Golden West is comprised of three towers that now total 284 units. Two towers (Central and South) are in a 253-unit LIHTC, elderly (62+) high-rise property acquired by BHP in 2025. The third tower was vacant at the time of acquisition and was renovated into 31 apartments as of the end of 2026. To provide deeper affordability for residents, BHP intends to project-base (PBV) up to 30 vouchers for studio and one-bedroom units amongst the three towers.

B.3. Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan.

Boulder Housing Partners strategic framework includes four strategies.

- 1. Support Residents and Strengthen Communities:** We provide high-quality customer service, treating all people with kindness, respect, and dignity. We foster partnerships with residents, participants, and local organizations to increase opportunities and strengthen the broader community.
 - Continue our work with our current community partners to expand delivery of services to all households, with a focus on improving economic self-sufficiency, health and well-being, and childhood readiness for success in school
 - Support resident households on their individual path towards greater sufficiency
 - Connect households to other service providers in the community to allow seniors and people with disabilities to age in place and live independently with the necessary supports
 - Increase accountability for households living in BHP communities by enforcing lease provisions, educating residents on lease requirements, connecting to services for activity that is not lease compliant
 - Provide education and communication to voucher holders and residents through community meetings, HCV education sessions and information posted on our website

- 2. Increase Affordable Housing Opportunities:** We seek to meet the changing housing needs of our community. Our expertise is affordable and attainable rental housing. We work in collaboration with the City of Boulder to address community housing goals and provide opportunities that would not otherwise be available in the local market. We are agile and responsive to opportunities, providing permanently affordable homes through development, acquisition, and vouchers.
 - Deploy Restore/Rebuild vouchers at future development to better leverage the potential to house lower income households
 - Apply for any HUD-NOFA as they are announced and when appropriate
 - Add to BHP's inventory of permanently affordable units through development of new housing and acquisition of existing housing, using a variety of tools and partnerships

3. **Steward our Resources Effectively:** We are diligent stewards of public resources and champions for those who need them. We manage our resources through effective business practices, strategic asset management, community collaborations, environmental stewardship, and innovative systems that bring clarity and focus to our work.

- Continually strive to implement new operational systems that increase efficiency while reducing administrative burden on our clients and residents
- Actively seeking new partnerships to enhance our energy efficiency and reduce utility costs to provide our clients with high-quality housing at the most affordable cost

4. **Cultivate an Outstanding Workplace:** We create a positive workplace culture, striving to attract and retain the best employees. We support wellness and balance in employees' lives, and we cultivate the creativity, passions, and unique skills of our team members.

- Employees are our greatest asset, and we focus continually on their personal and professional development
- Education and training are key to our employees being successful at their jobs
- By continually developing technical and leadership skills, we focus on building the internal opportunities for promotion
- Creating a work-life balance where employees can reach their full potential

C.1. Resident Advisory Board (RAB) Comments

If comments were received, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

A public hearing will be held on August 20, 2026, and the RAB Meeting will be held on August 25, 2026.

There were 6 Participants who attended in person, and 5 Participants who attended remotely via Zoom for the public hearing on August 20, 2026, and 0 participants at the TRAB meeting on August 25, 2026. Below are the comments and responses.

Comment	Response
What is shortfall?	Shortfall generally refers to a situation in which the funding available to a housing authority or program is insufficient to cover its projected costs and financial obligations. In other words, the amount of HUD funding provided is less than the amount needed to fully operate the program and meet all required obligations.
Is the intent to project base 30% AMI or 30 actual vouchers at GW?	The intent is to designate up to 30 units at our Golden West site as project-based units.
What is a project based voucher?	Project-Based Vouchers (PBVs) are a type of HUD Housing Choice Voucher assistance in which the rental assistance is tied to a specific housing unit or property rather than following the participant when they move. This means the assistance remains with the designated unit, and the unit continues to receive voucher assistance for eligible participants who reside there.
Can someone move with a project based voucher?	When a participant has completed the required 36 months (three years) in a project-based unit, they may request the next available tenant-based voucher to move with. At this time, we do not have tenant-based vouchers available to issue. We have established a waiting list for participants who have completed their three-year period and have requested a tenant-based voucher. Once tenant-based vouchers become available, we will begin contacting participants on the waiting list in the order in which their requests were received.
Are there properties that are specifically designated as Project Based?	Yes, we have specific properties that consist entirely of project-based units, such as Boulder Communities. We also have properties where only certain units or unit selections are designated as project-based.

How do we monitor our Next Available Voucher requests?	We currently maintain a list of participants who have completed their initial 36-month (three-year) period in a project-based unit and have requested the next available tenant-based voucher. Once we are able to issue tenant-based vouchers again, we will begin contacting participants on the list based on the date their request was added. This process will follow the established order of the waiting list.
A friend of mine just got approved for disability payments that granted him 100% of the benefits payment, will he lose his voucher?	This would require an individualized review based on the participant's current reported information and the potential impact of an increase in income. Because the outcome will depend on the participant's specific circumstances, it is recommended that the participant contact their housing case manager. The case manager can review the participant's current information and ensure that all income and household information is accurate and up to date before determining how an increase in income may affect their rent portion or program status.
How often are vouchers reevaluated?	Participants in the Work-Able Family Program are reexamined every two years. Participants who are part of the MTW Elderly and/or Disabled Program are recertified every three years.

Notice of Change in rent does not reflect Medical Deductions.	We are a Moving to Work (MTW) agency, which provides us with the flexibility to make program changes designed to better serve our participants. As part of our MTW activities, we made changes to the standard PHA program requirements for elderly and/or disabled households. Specifically, these households are not required to submit documentation of medical expenses in order to receive the medical expense deduction. Rather than requiring eligible elderly and/or disabled households to document and verify medical expenses in order to receive a benefit, we adapted the program to provide an automatic rent calculation adjustment for these households. Specifically, the percentage of monthly gross income used to calculate the household's rent portion was reduced from the standard 30% to 26.5%. This adjustment provides the benefit without requiring households to report or verify medical expenses. This approach simplifies the process for participants while providing a lower rent burden for eligible elderly and/or disabled households.
Is there a Mandatory deduction from HUD for \$550?	No, BHP is a Moving to Work (MTW) agency, which provides us with the flexibility to make program changes designed to better serve our participants. As part of our MTW activities, we made changes to the standard PHA program requirements for elderly and/or disabled households. Specifically, these households are not required to submit documentation of medical expenses in order to receive the medical expense deduction. Rather than requiring eligible elderly and/or disabled households to document and verify medical expenses in order to receive a benefit, we adapted the program to provide an automatic rent calculation adjustment for these households. Specifically, the percentage of monthly gross income used to calculate the household's rent portion was reduced from the standard 30% to 26.5%. This adjustment provides the benefit without requiring households to report or verify medical expenses. This approach simplifies the process for participants while providing a lower rent burden for eligible elderly and/or disabled households.

I have been working with MHP and All Roads to access all of the services and lists that BHP offers. Can you please clarify whether I currently have a voucher, or whether I am on a waiting list to receive a voucher?	If you have not gone through the formal application process with Boulder Housing Partners (BHP), you may not have been approved for assistance or started receiving housing assistance through BHP. Our tenant-based voucher lottery has been closed for the past several years. At this time, there is no way to be added to the tenant-based voucher waiting list until the lottery is reopened. When the lottery becomes available, BHP will provide information to the public about how and when to enter the lottery pool. Project-based units also have a separate waiting list process, which is currently closed. When the project-based waiting list is scheduled to open, BHP will advertise the opportunity in advance and provide applicants with a specific timeframe in which they can submit their information to be considered for the waiting list. Once an applicant reaches the top of the waiting list and a unit becomes available, the eligibility and application process will begin. If you have recently been in contact with BHP, it is possible that you have been added to our Affordable Housing Rental Interest List. This list is for individuals and families who have expressed interest in renting an affordable unit with BHP. Being on the interest list does not necessarily mean that you have been approved for housing assistance or that you currently have a voucher. If you are interested in receiving housing assistance, we recommend that you continue to monitor the BHP website for announcements regarding the opening of waiting lists or lotteries. We also encourage you to continue working with our MHP and All Roads partners so they can assist you in identifying available resources and help ensure that you are prepared to apply when additional housing opportunities become available.
How many times can I apply for a voucher?	You may only receive assistance through one housing voucher program at a time. If you are considering applying for or receiving a voucher through another county or state housing authority, you would need to end your assistance with Boulder Housing Partners if you decide to accept voucher assistance to the other program under a different housing authority.

Why do project based vouchers exist?	BHP uses Project-Based Vouchers (PBVs) as one of the tools to continue providing and preserving deeply affordable housing opportunities within the City of Boulder. By attaching voucher assistance to specific units, BHP can keep those units affordable to households with lower incomes and help ensure that deeply affordable housing remains available in the community over the long term. Project-based vouchers also allow BHP to preserve affordability at existing properties and support the continued availability of housing for households who may otherwise have difficulty affording market-rate rents. The assistance remains with the designated unit rather than moving with the participant. This allows BHP to maintain a dedicated supply of deeply affordable units throughout its housing portfolio. Ultimately, the use of project-based vouchers supports BHP's broader goal of maintaining and expanding access to deeply affordable housing for low-income households in the City of Boulder.
How much income information is needed at time of recertification in order to successfully complete the process?	During the recertification process, the documentation required is generally related to verifying your household's current income and assets. This may include recent pay stubs, bank or asset account statements, and other documentation needed to verify information that has changed or needs to be updated. For example, depending on the circumstances, a household may be asked to provide multiple pay stubs or one to six months of statements for each applicable asset account. The specific documentation required is determined on a case-by-case basis. Each recertification is reviewed individually based on the information the household has previously reported, any changes being reported, and the information that needs to be verified. As a result, not every household will be required to provide the same documentation. If you would like further information related to your case-specific needs, please feel free to come in on Wednesdays during walk-in hours or give us a call or email.

At time of recertification, do I need to get back on a waitlist to be eligible for housing assistance benefits again?	No. When you complete your recertification, you are not added back to a waiting list. Recertification is part of the ongoing program process and is used to confirm that you continue to meet the eligibility requirements for your housing assistance and remain eligible to receive the associated housing benefits. The purpose of recertification is to review your current household and income information and determine whether you continue to qualify for the program. As long as you remain eligible and meet the program requirements, your housing assistance continues according to the applicable program rules.
If someone ports their voucher out of Colorado does a new voucher become available for someone else in Boulder County?	A new voucher only becomes available if the receiving Housing Authority absorbs the voucher, meaning it takes over responsibility for administering and funding the voucher. If the voucher is not absorbed, it continues to be administered and funded by BHP, even if the participant moves outside of Boulder County, and remains in use.
I am 60 years old today, am I eligible to live at Golden West?	Our Golden West community offers independent living for adults who are 62 years of age and older. Unfortunately, individuals who are 61 years of age or younger would not meet the age eligibility requirements for this community. We encourage you to continue checking the BHP website for other properties and housing opportunities that may be available to households who are not 62 or older. BHP also has other project-based housing opportunities with different age and eligibility requirements. For example, our Boulder Communities portfolio, which includes Northport and Walnut Place, has project-based units designated for households with members who are 55 years of age or older. Additionally, our Madison and Manhattan properties have certain project-based units designated for households who are 62 years of age or older or who meet the applicable disability requirements. Waiting lists for these properties may open at different times. We recommend continuing to check the BHP website and stay connected with BHP for announcements regarding upcoming waiting-list openings and eligibility requirements.

Does MTW mean that participants have to work?	No. Being part of a Moving to Work (MTW) agency does not mean that you are required to work. MTW stands for Moving to Work. It is a HUD program that gives participating housing authorities additional flexibility to design and implement housing programs that better meet the needs of their local communities. BHP uses MTW flexibility to develop and implement local housing policies and activities that support affordable housing, housing stability, and the needs of the Boulder community.
Can you use your voucher in assisted living facility?	No. Housing vouchers are not currently a source of assistance that can be used for assisted living. Additionally, Boulder Housing Partners (BHP) does not offer assisted living units. BHP's housing assistance programs are intended to provide affordable housing and rental assistance within eligible housing units that meet the requirements of the applicable program. If you are seeking assisted living or supportive care services, you would need to explore resources and programs specifically designed for those types of services.
Why did BHP fall in to Shortfall?	In 2025, the funding provided for renewing existing vouchers was not enough to cover the full cost of the program for many PHAs including BHP. To protect our current voucher holders, BHP implemented a voucher freeze. This helped us manage our available funding and make sure that families already receiving assistance were not put at risk.
What is the likelihood of falling in to Shortfall again?	In an effort to avoid falling into another budget shortfall, we will continue to closely monitor our budget and expenses. At this time, we will be holding back on issuing any tenant-based vouchers. We will also do our best to keep our tenants informed of any updates or changes as they arise and communicate with them as clearly and consistently as possible.
I currently live with BHP, how will NSPIRE changes affect me?	If you live in a BHP-owned or BHP-managed unit, it is likely that your unit has already been inspected through BHP's regular property management inspection process. Many of the NSPIRE-related inspection changes have already been incorporated into BHP's inspection practices over the past year to year and a half. The changes taking effect on January 1, 2027, primarily apply to privately owned units participating in the Housing Choice Voucher program. Private landlords will be required to meet the applicable NSPIRE inspection requirements for their units in order for the units to continue participating in the program. Therefore, if you live in a BHP unit, the January 1, 2027 requirement is not a new inspection requirement that you would need to arrange or complete yourself. BHP will continue

	to manage the inspection process for its properties.
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Certifications of Compliance with PHA Plan and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or ☒ Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 1/1/2027, in connection with the submission of the Plan and implementation thereof:

1. 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 (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 11. The 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.
 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
 13. The 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.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. With respect to public housing the 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.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The 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 regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA 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 PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Boulder Housing Partners

CO016

PHA Name

PHA Number/HA Code

✓ Annual PHA Plan for Fiscal Year 2027

 5-Year PHA Plan for Fiscal Years 20 - 20

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 Executive Director

Name Board Chairman

Signature

Date

Signature

Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

FORM 50900-EXPANSION: ELEMENTS FOR THE ANNUAL MOVING TO WORK PLAN- EXPANSION

The public reporting burden for this collection of information is estimated to average 6 per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7th Street SW, Room 8210, Washington, DC 20410-5000. Do not send completed forms to this address. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. HUD collects this information to evaluate the impacts of Moving to Work (MTW) activities; to accurately and timely respond to congressional and other inquiries regarding outcome measures; and to identify promising practices learned through the MTW Demonstration. HUD uses this information to report outcome information on the effects of MTW policy changes on residents, operations, and the local community. Responses to this collection of information are required to obtain a benefit or to retain a benefit per the requirements of Section 204 of Title II of section 101(e) of the Omnibus Consolidated Rescissions and Appropriations Act of 1996, Public Law 104-134 (approved April 26, 1996) under which the Moving to Work (MTW) Demonstration Program was established. This information collected will not be held confidential.

Explanatory Note to Public Reviewers of the Proposed Moving to Work Plan-Expansion Fillable Form

The Moving to Work (MTW) Plan-Expansion collects information about policies implemented by MTW Expansion Agencies. MTW Expansion Agencies use it to communicate their plans with residents and community stakeholders through required public comment processes, and HUD uses the information collected to monitor and evaluate the MTW demonstration program. MTW Expansion Agencies will submit the MTW Plan-Expansion to HUD annually and amend it as needed, subject to public process requirements. HUD plans to make the MTW Plan-Expansion into a fillable form or system so as to reduce respondent burden and make the information collected more useful to HUD. When the MTW Plan-Expansion is available through the fillable form or system, it may include skip patterns¹ that prompt the user to populate only the relevant sections. It will also include screening questions that will ask which MTW Waivers and associated activities the MTW Expansion Agency is currently implementing, planning to implement, or will be discontinuing in the submission year. The purposes of the MTW Plan-Expansion are two-fold: it reports to HUD what general flexibilities are happening at the local level; and, it informs the public about what the MTW Expansion Agency is planning in order to give the public the ability to provide comment.

The MTW Plan-Expansion asks for information about each of the MTW Waivers and associated activities that are made possible by the MTW Operations Notice, Safe Harbor Waivers and Agency-Specific Waivers, and a few other types of information. MTW Expansion Agencies will fill in information/data through a fillable form or system as available and the information collected will be stored by HUD. The approved forms will be posted to the MTW website for viewing by the public.

This document lists the sections of the MTW Plan-Expansion and presents the information to be included in the MTW Plan-Expansion for MTW Expansion Agencies. There are accompanying instructions at the end of the document to provide additional guidance and context.

Sections of the MTW Plan-Expansion:

- A. Public Housing Agency (PHA) Information
- B. Narrative
- C. MTW Waivers and Associated MTW Activities
- D. Safe Harbor Waivers
- E. Agency-Specific Waivers
- F. Planned Application of MTW Funding Flexibilities
- G. MTW Statutory Requirements
- H. Administrative Information
- I. MTW Certifications of Compliance

Information to be Collected for MTW Waivers and Associated Activities

There are many MTW Waivers and associated activities, subject to Safe Harbors as outlined in the MTW Operations Notice, that an MTW Expansion Agency may implement. Each MTW Expansion Agency will likely only engage in a subset of these MTW Waivers and associated activities. The MTW Plan-Expansion will first ask MTW Expansion Agencies to identify which MTW Waivers and associated activities they are proposing to implement and which of those they are already implementing. MTW Expansion Agencies

¹ A skip pattern is a question or series of questions associated with a conditional response.

will subsequently be asked to provide information only relevant to the status of MTW Waivers and associated activity. This feature will reduce respondent burden.

MTW Plan-Expansion	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. XXXX-XXXX Expires: Date
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Purpose. The Moving to Work (MTW) Plan-Expansion informs HUD, families served by the public housing agency (PHA), and members of the public, about the MTW Waivers and associated activities that the MTW Expansion Agency seeks to implement in the coming PHA Fiscal Year and updates the status of MTW Waivers and associated activities that have been previously approved. It also provides information about Safe Harbor Waivers, Agency-Specific Waivers, and compliance with MTW Statutory Requirements. The MTW Plan-Expansion does not replace the PHA Plan. MTW Expansion Agencies must continue to submit the applicable PHA Plan.

Applicability. MTW Expansion Agencies, even those that are not required to submit annual PHA Plans under the Housing and Economic Recovery Act of 2008 (HERA), must submit the MTW Plan-Expansion annually. The MTW Plan-Expansion must be submitted to HUD 75 days in advance of the PHA Fiscal Year beginning. The MTW Plan-Expansion is required to go through the same level of public process as the PHA Plan.

Definitions. All terms used in this MTW Plan-Expansion are consistent with the definitions stated in the MTW Operations Notice, including:

- (1) **Local, Non-Traditional (LNT) Activities** – Those MTW activities that use MTW funding flexibility outside of the Housing Choice Voucher (HCV) and public housing programs established in Sections 8 and 9 of the U.S. Housing Act of 1937.
- (2) **MTW Expansion Agencies** – All MTW agencies brought onto the MTW demonstration pursuant to Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute) or initial MTW agencies² that transitioned off of the Standard MTW Agreement and chose to follow the requirements of the MTW Operations Notice.
- (3) **MTW Funds** – Any public housing Operating Fund Program (OFF) grants, public housing Capital Fund Program (CFP) grants, and HCV Housing Assistance Payment (HAP) and Administrative Fee assistance provided to an MTW Expansion Agency.
- (4) **Safe Harbors** – The additional parameters or requirements, beyond those specified in the MTW activity description itself, found in the MTW Operations Notice (following each activity description) that the MTW Expansion Agency must follow in implementing MTW Waivers and associated activities.
- (5) **Substantially the Same Requirement** – A statutory MTW requirement that all MTW agencies must continue to assist substantially the same total number of eligible low-income families as would have been served absent the MTW demonstration.

A.	PHA Information.
A.1	PHA Name: <u>Boulder Housing Partners</u> PHA Code: <u>CO016</u> MTW Plan-Expansion for PHA Fiscal Year End: (MM/DD/YYYY): <u>12/31/2027</u> PHA Program Type: ☒ <u>HCV only</u> MTW Cohort Name: N/A (Transitioned from Legacy MTW to Expansion) MTW Plan-Expansion Submission Type: ☒ <u>Annual Submission</u>

B.	Narrative.
B.1	MTW Plan-Expansion Narrative. The narrative provides the MTW Expansion Agency with an opportunity to explain to the public, including the families that it serves, its MTW plans for the PHA Fiscal Year and its short and long-term goals. The MTW Expansion Agency must provide a description of how it seeks to further the three MTW statutory objectives during the coming PHA Fiscal Year. Those three MTW statutory objectives 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

² Initial MTW Agencies are agencies that were designated as MTW as of December 15, 2015.

	working, seeking work, or are 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. Boulder Housing Partners' short- and long-term goals are the same and include the following related to the statutory goals for the MTW Program: Reduce cost and achieve greater cost effectiveness in federal expenditures: Many of BHP's current activities are aimed at increasing efficiencies for the housing choice voucher program participants and staff and are quite effective. BHP continues to seek ways to use technology to decrease the burden on participants and increase the efficiency of the required processes. Give incentive to families with children to become economically self-sufficient: BHP has a strong resident services team that strives to provide the level of service needed to keep our elderly residents in their homes where they can age in place with the services appropriate to their needs; assist person with disabilities to receive the service 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. Increase housing choices for low-income families: In 2013, BHP had a total of 1,066 units. In 2025, BHP added 517 units through one acquisition and construction of three properties. This brings our total unit count to 2,100 units. The development pipeline currently has two pieces of land banked for future development and plans for construction of an additional 700+ units in the pipeline, providing even more affordable units to our community. In 2013, BHP administered 861 vouchers. As of 2026, BHP's voucher total has increased to 1,420. BHP has added 135 RAD Vouchers, 194 tenant protection vouchers, 22 Fair Share Vouchers, 35 Emergency Housing Vouchers (13 of which have already sunset), 138 Mainstream Vouchers, 48 households supported by the City of Boulder with rental assistance and supportive services and 22 households receiving rental assistance and supportive services through HUD's Continuum of Care Program. BHP plans to use vouchers through the Restore/Rebuild Program to provide affordable, new housing to 44 families with children and 55 elderly households within the next 2 years. BHP will continue to apply for any new voucher opportunities that are released to increase our voucher inventory.
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C.	MTW Waivers and Associated Activities.
	NOTE: MTW Expansion Agencies are reminded that all MTW Waivers and associated activities must be implemented in accordance with the MTW Operations Notice and within its safe harbors unless a Safe Harbor Waiver approval is provided by HUD, in which case, the activity utilizing the Safe Harbor Waiver must be implemented in accordance with the terms of the approval.
Screener	Assign one of the following categories for each of the MTW Waivers and associated activities listed in the "Provide Activity Status Category" column of the table below. • Planning to Implement (Seeking Approval - First Year) • Planning to Implement (Already Approved - Subsequent Year) • Currently Implementing • Discontinued or To-be Discontinued • Not Currently Implemented

MTW WAIVERS AND ASSOCIATED ACTIVITIES IN THE MTW PLAN-EXPANSION

Section	Provide Activity Status Category
1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not currently implemented
b. Tiered Rent (HCV)	Currently implementing
c. Stepped Rent (PH)	Not currently implemented

Section	Provide Activity Status Category
d. Stepped Rent (HCV)	Not currently implemented
e. Minimum Rent (PH)	Not currently implemented
f. Minimum Rent (HCV)	Currently implementing
g. Tenant Payment as a Modified Percentage of Income (PH)	Not currently implemented
h. Tenant Payment as a Modified Percentage of Income (HCV)	Currently implementing
i. Alternative Utility Allowance (PH)	Not currently implemented
j. Alternative Utility Allowance (HCV)	Currently implementing
k. Fixed Rents (PH)	Not currently implemented
l. Fixed Subsidy (HCV)	Not currently implemented
m. Utility Reimbursements (PH)	Not currently implemented
n. Utility Reimbursements (HCV)	Currently implementing
o. Initial Rent Burden (HCV)	Currently implementing
p. Imputed Income (PH)	Not currently implemented
q. Imputed Income (HCV)	Not currently implemented
r. Elimination of Deduction(s) (PH)	Not currently implemented
s. Elimination of Deduction(s) (HCV)	Currently implementing
t. Standard Deductions (PH)	Not currently implemented
u. Standard Deductions (HCV)	Not currently implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not currently implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Currently implementing
2. Payment Standards and Rent Reasonableness	
a. Payment Standards – Small Area Fair Market Rents (HCV)	Not currently implemented
b. Payment Standards – Fair Market Rents (HCV)	Not currently implemented
c. Rent Reasonableness – Process (HCV)	Not currently implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently implementing
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not currently implemented
b. Alternative Reexamination Schedule for Households (HCV)	Currently implementing
c. Self-Certification of Assets (PH)	Not currently implemented
d. Self-Certification of Assets (HCV)	Not currently implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not currently implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Currently implementing
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Currently implementing
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Not currently implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not currently implemented
c. Third-Party Requirement (HCV)	Currently implementing
d. Alternative Inspection Schedule (HCV)	Currently implementing
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not currently implemented
b. Short-Term Assistance (HCV)	Not currently implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not currently implemented
b. Term-Limited Assistance (HCV)	Not currently implemented
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently implementing
b. Increase PBV Project Cap (HCV)	Currently implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently implementing
d. Alternative PBV Selection Process (HCV)	Not currently implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not currently implemented
f. Increase PBV Housing Assistance Payment (HAP) Contract Length (HCV)	Not currently implemented

Section	Provide Activity Status Category
g. Increase PBV Rent to Owner (HCV)	Currently implementing
h. Limit Choice Mobility for PBV Units (HCV)	Currently implementing
10. Family Self-Sufficiency Program with MTW Flexibility	
a. Waive Operating a Required FSS Program (PH & HCV)	Not currently implemented
b. Alternative Structure for Establishing Program Coordinating Committee (PH & HCV)	Not currently implemented
c. Alternative Family Selection Procedures (PH & HCV)	Not currently implemented
d. Modify or Eliminate the Contract of Participation (PH & HCV)	Not currently implemented
e. Policies for Addressing Increases in Family Income (PH & HCV)	Currently implementing
11. MTW Self-Sufficiency Program	
a. Alternative Family Selection Procedures (PH & HCV)	Not currently implemented
b. Policies for Addressing Increases in Family Income (PH & HCV)	Not currently implemented
12. Work Requirement	
a. Work Requirement (PH)	Not currently implemented
b. Work Requirement (HCV)	Not currently implemented
13. Public Housing as an Incentive for Economic Progress (PH)	
14. Moving On Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not currently implemented
b. Allow Income Calculations from Partner Agencies (PH & HCV)	Not currently implemented
c. Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH & HCV)	Not currently implemented
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not currently implemented
b. Service Provision	Not currently implemented
c. Housing Development Programs	Currently implementing

For all MTW Waivers and associated activities in the “Planning to Implement (Seeking Approval - First Year)”; “Planning to Implement (Already Approved - Subsequent Year)”; and “Currently Implementing” categories, answer each of the following questions:

1.b. Tenant Rent Policies: Tiered Rent (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2016-1: Tiered rent for work-abled families. BHP was approved for a Safe Harbor Waiver upon transition from Legacy to Expansion MTW Agency.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☐ Cost effectiveness ☒ Self-sufficiency ☒ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☒ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	Upon original approval in 2014, a hardship policy was in effect. As of 2016, no family qualified for the hardship, and no new instances were allowed after households transitioned to the rent structure.
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was included with the original MTW Annual Plan in 2014.

1.f. Tenant Rent Policies: Minimum rent (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2016-1: Tiered rent for work-abled families. BHP was approved for a Safe Harbor Waiver upon transition from Legacy to Expansion MTW Agency.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☐ Cost effectiveness ☒ Self-sufficiency ☒ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☐ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☒ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was included with the original MTW Annual Plan in 2014.

1.h. Tenant Rent Policies: Tenant Payment as a Modified Percentage of Income (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2012-2: Elderly and disabled household rent structure. This activity meets all the associated safe harbors.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☒ Self-sufficiency ☒ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☒ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	A hardship policy was included in the original activity. There are currently 2 households who remain under the hardship policy, which was automatically provided when rent increase met hardship threshold. No new cases of hardship were allowed after the transition of households in 2012.
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was included with the original MTW Annual Plan in 2012.

1.j. Tenant Rent Policies: Alternative Utility Allowance	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2012-6: Flat utility allowance for HCV. This activity meets all the associated safe harbors.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☐ Self-sufficiency ☒ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☐ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue

	☒ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	Upon original approval in 2012, a hardship policy was in effect. Hardship policy is no longer relevant.
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was conducted in 2012 when the activity was originally proposed.

1.n. Tenant Rent Policies: Utility Reimbursements (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2013-1: Eliminate utility reimbursement payments. This activity meets all the associated safe harbors.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☐ Self-sufficiency ☐ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☐ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☒ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was conducted in 2013 when the activity was originally proposed.

1.o. Tenant Rent Policies: Initial Rent Burden	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2012-5: Eliminate the 40% of income cap in the voucher program. BHP was approved for a Safe Harbor Waiver upon transition from Legacy to Expansion MTW Agency.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☐ Self-sufficiency ☒ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☒ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was conducted in 2012 when the activity was originally proposed.

1.s Tenant Rent Policies: Elimination of Deductions (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2012-2: Elderly and disabled household rent structure; MTW Activity 2016-1: Tiered rent for work-abled families; and MTW 2020-1: FSS rent and escrow. BHP was approved for a Safe Harbor Waiver upon transition from Legacy to Expansion MTW Agency.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☒ Self-sufficiency

	X Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) X Neutral (no cost implications) ___ Increased revenue ___ Decreased revenue ___ Increased expenditures ___ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	Hardship policies were in place upon approval of original activities. Only two households under hardship policy for elderly and disabled household rent structure.
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analyses were done for all three activities the year they were proposed and approved.

1.w. Tenant Rent Policies: Alternative Income Inclusions/Exclusions (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2016-1: Tiered rent for work-abled families; and MTW 2025-1: Student financial assistance. BHP was approved for a Safe Harbor Waiver upon transition from Legacy to Expansion MTW Agency.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) X Cost effectiveness X Self-sufficiency X Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) X Neutral (no cost implications) ___ Increased revenue ___ Decreased revenue ___ Increased expenditures ___ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	Hardship policy was in place upon approval of original activity 2016-1. No hardship policy was created for activity 2025-1.
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analyses were done for these activities the year they were proposed and approved.

2.d. Rent Reasonableness: Third-Party Requirement (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2014-6: Rent limits and rent reasonableness, then combined into MTW Activity 2018-1: Project-based voucher waivers was approved in 2014. This activity meets all the associated safe harbors.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) X Cost effectiveness ___ Self-sufficiency ___ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) X Neutral (no cost implications) ___ Increased revenue ___ Decreased revenue ___ Increased expenditures ___ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analyses were done for these activities the year they were proposed and approved.

3.b. Reexaminations: Alternative Reexamination Schedule for Households (HVC)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2016-1: Tiered rent for work-abled families; MTW Activity 2012-2: Elderly and disabled rent structure; and MTW 2025-1: Student financial assistance. BHP was approved for a Safe Harbor Waiver upon transition from Legacy to Expansion MTW Agency.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☐ Self-sufficiency ☒ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☒ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	Yes. BHP has eliminated interim recertifications due to loss of income except in certain circumstances. When an interim is not conducted, families may be referred to the safety net fund for temporary assistance if they qualify for the referral.
If applicable, how many hardship requests have been received associated with this activity in the most recently completed PHA Fiscal Year?	How many hardship requests were received? 44 How many hardship requests were approved? 20 How many hardship requests were denied? 24, 5 referred to the safety net fund. How many are pending? 0
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was done in the year that each activity was proposed and approved by HUD.

4.b. Landlord Leasing Incentives: Damage Claims (HCV-Tenant-Based Assistance)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2016-3: Landing landlords was approved in 2016 and meets all the associated safe harbors.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☐ Cost effectiveness ☐ Self-sufficiency ☒ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☐ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☒ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was done in 2016 when activity was proposed and approved by HUD.

4.c. Landlord Leasing Incentives: Other Landlord Incentives (HCV- Tenant-based Assistance)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW	MTW Activity 2016-3: Landing landlords was approved in 2016 and meets all the associated safe harbors.

Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☐ Cost effectiveness ☐ Self-sufficiency ☒ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☐ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☒ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was done in 2016 when activity was proposed and approved by HUD.

5.c. Housing Quality Standards: Third-Party Requirement	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2018-1: Project-based voucher waivers was approved in 2018. This activity meets all the associated safe harbors.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☐ Self-sufficiency ☐ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☐ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☒ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was conducted in 2018 when activity was proposed and approved by HUD.

5.d. Housing Quality Inspections: Alternative Inspection Schedule (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2013-1 – Housing quality standards inspection schedule was approved in 2013. This activity meets all the associated safe harbors.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☐ Self-sufficiency ☐ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☐ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☒ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No

Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was done in 2013 when activity was proposed and approved by HUD.
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9.a. PBV Program Flexibilities: Increase PBV Cap (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	Originally part of MTW Activity 2012-1, then incorporated into MTW Activity 2018-1: Project-based voucher program. This activity was approved in 2012. BHP was approved for a Safe Harbor Waiver upon transition from Legacy to Expansion MTW Agency.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☐ Self-sufficiency ☒ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☒ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was included in 2012 when original activity was proposed and approved.

9.b. PBV Program Flexibilities: Increase PBV Project Cap (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	Originally part of MTW Activity 2012-1, then incorporated into MTW Activity 2018-1: Project-based voucher program. This activity was approved in 2012. This activity meets all the associated safe harbors.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☐ Cost effectiveness ☐ Self-sufficiency ☒ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☒ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was included in 2012 when original activity was proposed and approved.

9.c. PBV Program Flexibilities: Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	Originally part of MTW Activity 2012-1, then incorporated into MTW Activity 2018-1: Project-based voucher program. This activity was approved in 2012. This activity meets all the associated safe harbors.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☐ Self-sufficiency ☐ Housing choice

Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☒ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was included in 2012 when original activity was proposed and approved.

9.g. PBV Program Flexibilities: Increase PBV Rent to Owner (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	Originally part of MTW Activity 2012-1, then incorporated into MTW Activity 2018-1: Project-based voucher program. This activity was approved in 2012. This activity was approved in 2012. This activity meets all the associated safe harbors.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☐ Self-sufficiency ☐ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☒ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was conducted in 2012 when activity was proposed and approved by HUD.

9.h. PBV Program Flexibilities: Limit Choice Mobility for PBV Units (HCV)	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	This part of MTW 2018-1: Project Based Voucher Program was originally approved in 2024. BHP was approved for a Safe Harbor Waiver upon transition from Legacy to Expansion MTW Agency.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☐ Self-sufficiency ☐ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☒ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was done in 2024 when original activity was proposed and approved.

10.e. FSS Program: Policies for Addressing Increases in Family Income (HCV)	Input options and instructions
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Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2020-1 – Rent and escrow for FSS participants. This activity meets all the associated safe harbors.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☒ Cost effectiveness ☒ Self-sufficiency ☐ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☒ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	Hardship policy was created for MTW Activity 2016-1 which is the income and rent tier structure for work abled families. Hardship policy applies to all work-abled families (within the FSS program or not). Hardship policy allows for referral to the safety net fund when an interim recert to decrease income is not conducted. See 3.b. Reexaminations: Alternative Reexamination Schedule for Households (HCV).
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was done in 2020 when activity was proposed for approval.

17.c. Local, Non-Traditional Activities: Housing Development Programs	Input options and instructions
Safe Harbors. Does this MTW activity meet all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver?	MTW Activity 2015-1 – Affordable housing acquisition and development fund was approved by HUD in 2015. This activity meets all the safe harbors.
MTW Statutory Objectives. Which of the MTW statutory objectives does this MTW activity serve?	(Check at least one) ☐ Cost effectiveness ☐ Self-sufficiency ☒ Housing choice
Cost implications. What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what is known today.	(Check at least one) ☒ Neutral (no cost implications) ☐ Increased revenue ☐ Decreased revenue ☐ Increased expenditures ☐ Decreased expenditures
Hardship Policy. Does this MTW activity require a hardship policy?	No
Impact Analysis. Does the MTW activity require an impact analysis?	Impact analysis was done in 2015 when activity was first proposed.

For all MTW Waivers and associated activities in the “Discontinued or To-be Discontinued” category, answer the following question:

Question Text	Input options and instructions
Provide an explanation as to why the MTW activity was discontinued or will be discontinued.	All activities that BHP had prior to transitioning from a Legacy to Expansion Agency that were discontinued were fully explained in the MTW Annual Report for that year.

D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval:

	The MTW Operations Notice describes the process for MTW Expansion Agencies to implement MTW Waivers and associated activities outside of the safe harbors described in Appendix I. For each Safe Harbor Waiver request, a document that includes the following information must be uploaded/attached by the MTW Expansion Agency: a) the name and number of the MTW Waiver and associated activity for which the MTW Expansion Agency is seeking to expand the safe harbor, b) the specific safe harbor(s) and its implementing regulation, c) a description of the local issue and why such an expansion of the safe harbor(s) is needed to implement the MTW activity, d) the MTW statutory objective(s) the MTW activity furthers and any cost implications associated with the MTW activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the MTW activity, if applicable, and h) a description of the public process and a copy of all comments received at the public hearing along with the MTW Expansion Agency's description of how the comments were considered. Has the MTW Expansion Agency submitted a new request for approval of a Safe Harbor Waiver in this MTW Plan-Expansion? <u> X </u> No [If no, skip to D.2] <u> </u> Yes [If yes, upload/attach required information in a-i above for each Safe Harbor Waiver request]
D.2	Safe Harbor Waivers(s) for which HUD Approval has been Received: Does the MTW Expansion Agency have any already approved Safe Harbor Waivers? <u> </u> No [If no, question set concludes] <u> X </u> Yes [If Yes] Provide the names of approved Safe Harbor Waiver(s) and the MTW Plan-Expansion fiscal year end in which they were approved. 1.b. - Tiered Rent (HCV). MTW Activities 2016-1: Flat tiered rent for work-able families (approved in FY2014) and 2020-1: Rent and escrow for FSS participants (approved in FY2020)– rent is set at the mid-point of each income band (not based on the lowest income in the band). 1.f - Minimum Rent (HCV). MTW Activities 2016-1: Flat tiered rent for work-able families (approved in FY2014) and 2020-1: Rent and escrow for FSS participants (approved in FY2020) – minimum rent is based on bedroom size, ranging from \$120 – \$180. 1.o. - Initial Rent Burden (HCV only) - MTW Activity 2012-5: Eliminate the 40% cap of income towards rent (approved in FY2012) – there is no restriction on rent burden (cannot be more than 100%). 1.s. - Elimination of Deductions (HCV) - MTW Activity 2016-2: Rent reform for elderly/disabled households (approved in FY2012) – removes all deductions of income for elderly and disabled households, rent is based solely on gross income. 1.w. - Alternative Income Inclusions/Exclusions. MTW Activities 2012-4: Rent simplification for households (approved in FY2012) and 2025-1: Student financial assistance excluded from income (approved in FY2025) – these activities are allowed to be applied to all households, including the elderly and disabled households. 3.b. - Alternative Reexamination Schedule for Households. MTW Activities 2016-1: Flat tiered rent for work-able families (approved in FY2014), 2016-2: Rent reform for elderly and disabled households (approved in FY2016), and 2020-1: Rent and escrow for FSS participants (approved in FY2020) – these activities allow for an alternative process for interim adjustments to income. 9.a. Increase PBV Program Cap (HCV). MTW Activity 2018-1: Project-Based Voucher Waivers (approved in FY2012) – allows for elimination of PBV cap. 9.h. Limit Choice Mobility for PBV Units. MTW Activity 2018-1: Project-Based Voucher Waivers (approved in FY2024) – allows for restriction of portability for PBV units up to 36 months. [If Yes] Has there been a change in how the Safe Harbor Waiver(s) are being implemented from when they were originally approved? No. [If Yes] If there has been a change(s), provide a description of what has changed for each applicable Safe Harbor Waiver. Note whether it is a change newly proposed in this MTW Plan-Expansion and/or if the change was approved in a prior MTW Plan-Expansion. N/A.

	[If Discontinued]: 1) If this Safe Harbor Waiver has been discontinued, provide a description of the final outcomes and lessons learned from implementing this Safe Harbor Waiver at the MTW Expansion Agency. 2) If the MTW Expansion Agency was previously required to prepare an impact analysis, provide a final impact analysis prepared at the time of discontinuation. N/A
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E.	Agency-Specific Waivers.
E.1	Agency-Specific Waivers for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW Expansion Agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I of the MTW Operations Notice may be desired. Agency-Specific Waivers may be requested if an MTW Expansion Agency wishes to implement additional MTW activities, or waive a statutory and/or regulatory requirement, not included in Appendix I of the MTW Operations Notice. For each Agency-Specific Waiver request, a document that includes the following information must be uploaded/attached by the MTW Expansion Agency: - a full description of the MTW activity, including what the MTW Expansion Agency is proposing to waive (i.e., statute, regulation, and/or MTW Operations Notice), and how it meets the local need, - the MTW statutory objective(s) the MTW activity furthers and any cost implications associated with the MTW activity, - an implementation timeline for the initiative, - an impact analysis, - a description of the hardship policy for the MTW activity, if applicable, and - a description of the public process and a copy of all comments received at the public hearing along with the MTW Expansion Agency's description of how the comments were considered. Will the MTW Expansion Agency submit a request for approval of an Agency-Specific Waiver this year? ☒ No [If no, skip to E.2] ☐ Yes [If yes, provide a title and upload/attach required information in a-g above for each Agency-Specific Waiver request]
E.2	Agency-Specific Waivers(s) for which HUD Approval has been Received: Does the MTW Expansion Agency have any already approved Agency-Specific Waivers? ☒ No [If no, question set concludes] ☐ Yes [If Yes] Provide the names of approved Agency-Specific Waiver(s) and the MTW Plan-Expansion fiscal year end in which they were approved. [If Yes] Has there been a change in how the Agency-Specific Waiver(s) are being implemented from when they were originally approved? [If Yes] If there has been a change(s), provide a description of what has changed for each applicable Agency-Specific Waiver. Note whether it is a change newly proposed in this MTW Plan-Expansion and/or if the change was approved in a prior MTW Plan-Expansion. [If Discontinued]: 1) If this Agency-Specific Waiver has been discontinued, provide a description of the final outcomes and lessons learned from implementing this Agency-Specific Waiver at the MTW Expansion Agency. 2) If the MTW Expansion Agency was previously required to prepare an impact analysis, provide a final impact analysis prepared at the time of discontinuation.

F.	Planned Application of MTW Funding Flexibilities.
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F.1	Narrative of MTW Flexibility Provide a thorough narrative of the MTW Expansion Agency's plans to utilize its MTW Funding Flexibility for the upcoming PHA Fiscal Year. Boulder Housing Partners will continue to use funding flexibility for approved activities, which include using HAP revenue to reimburse landlords for damage claims, provide new landlords with incentive payments, and to cover any defaults on security deposit and/or moving assistance loans. BHP will also use HAP revenue to augment the RAD rents at our new Restore/Rebuild project-based voucher sites.																																									
F.2	LNT Funding Information a) Provide the total amount of MTW Funds planned to be spent in the PHA Fiscal Year under MTW Waiver and associated activity 17.a (LNT Rental Subsidy Program). \$0.00 For each third-party partner under MTW Waiver and associated activity 17.a (LNT Rental Subsidy Program) provide: <table border="1"> <thead> <tr> <th>Name of Third-Party Partner</th><th>Type of Services Provided by Third-Party Partner</th><th># of Units Planned to be Allocated to Third-Party Partner in PHA Fiscal Year</th></tr> </thead> <tbody> <tr> <td>N/A</td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> </tbody> </table> b) Provide the total amount of MTW Funds planned to be spent in the PHA Fiscal Year under MTW Waiver and associated activity 17.b (LNT Service Provision). \$0.00 c) Provide the total amount of MTW Funds planned to be spent in the PHA Fiscal Year under MTW Waiver and associated activity 17.c (LNT Housing Development Program). \$0.00 List information for each LNT Development in the planning/development stage under MTW Waiver and associated activity (17.c LNT Housing Development Program): <table border="1"> <thead> <tr> <th>Name/Address of LNT Development</th><th>LNT Development Type (Acquisition, Rehabilitation, New Construction)</th><th>Planned Number of Affordable Units (at or below 80% of AMI)</th><th>Total Planned Amount of MTW Funds Contributed</th></tr> </thead> <tbody> <tr> <td>N/A</td><td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td><td></td></tr> </tbody> </table> List information for each LNT Development that has been completed under MTW Waiver and associated activity (17.c LNT Housing Development Program): <table border="1"> <thead> <tr> <th></th><th></th><th></th><th></th></tr> </thead> <tbody> <tr> <td>Casey, 2453 Broadway, Boulder</td><td>Acquisition</td><td>5</td><td>\$1,659,860</td></tr> <tr> <td>Hayden Place 2, 3480 Hayden Place, Boulder</td><td>Acquisition</td><td>6</td><td>\$296,834</td></tr> <tr> <td>Twenty37, 2037 Walnut, Boulder</td><td>Acquisition</td><td>16</td><td>\$4,592,041</td></tr> <tr> <td>Harvest34 (formerly known as Orchard Grove)</td><td>Acquisition</td><td>Parcel of land 5.25 acres</td><td>\$484,635</td></tr> </tbody> </table>	Name of Third-Party Partner	Type of Services Provided by Third-Party Partner	# of Units Planned to be Allocated to Third-Party Partner in PHA Fiscal Year	N/A						Name/Address of LNT Development	LNT Development Type (Acquisition, Rehabilitation, New Construction)	Planned Number of Affordable Units (at or below 80% of AMI)	Total Planned Amount of MTW Funds Contributed	N/A												Casey, 2453 Broadway, Boulder	Acquisition	5	\$1,659,860	Hayden Place 2, 3480 Hayden Place, Boulder	Acquisition	6	\$296,834	Twenty37, 2037 Walnut, Boulder	Acquisition	16	\$4,592,041	Harvest34 (formerly known as Orchard Grove)	Acquisition	Parcel of land 5.25 acres	\$484,635
Name of Third-Party Partner	Type of Services Provided by Third-Party Partner	# of Units Planned to be Allocated to Third-Party Partner in PHA Fiscal Year																																								
N/A																																										
Name/Address of LNT Development	LNT Development Type (Acquisition, Rehabilitation, New Construction)	Planned Number of Affordable Units (at or below 80% of AMI)	Total Planned Amount of MTW Funds Contributed																																							
N/A																																										
Casey, 2453 Broadway, Boulder	Acquisition	5	\$1,659,860																																							
Hayden Place 2, 3480 Hayden Place, Boulder	Acquisition	6	\$296,834																																							
Twenty37, 2037 Walnut, Boulder	Acquisition	16	\$4,592,041																																							
Harvest34 (formerly known as Orchard Grove)	Acquisition	Parcel of land 5.25 acres	\$484,635																																							

G.	MTW Statutory Requirements.
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G.1 75% Very Low-Income – LNT.

HUD will verify compliance with the MTW Statutory Requirement that at least 75% of the households assisted by the MTW Expansion Agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW Expansion Agency must provide data for the actual families housed under MTW Waiver and associated activities 17.a (LNT Rental Subsidy Program) and 17.c (LNT Housing Development Program) upon admission during the MTW Expansion Agency's most recently completed PHA Fiscal Year (01/01/2025 - 12/31/2025).

Income Level	Number of LNT Households Admitted in the Fiscal Year*
80%-50% Area Median Income	1
49%-30% Area Median Income	5
Below 30% Area Median Income	1
Totals	7

* LNT income data must be provided in the MTW Plan-Expansion until such time that it can be submitted in IMS-PIC or other HUD system.

G.2 Substantially the Same (STS) – LNT.

Questions	Input options and instructions
Provide the total number of unit months that families were housed in a LNT rental subsidy under MTW Waiver and associated activity 17.a (LNT Rental Subsidy Program) for the prior full calendar year.	0 # of unit months (BHP does not have a LNT rental subsidy activity)

PROPERTY NAME/ADDRESS	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS*	POPULATION TYPE**	Was this Property Available for Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
Casey, 2453 Broadway, Boulder	0	5	0	0	0	0	0	5	General	Yes	\$1,659,860
Hayden Place 2, 3480 Hayden Place, Boulder	0	6	0	0	0	0	0	6	General	Yes	\$296,834
Twenty37, 2037 Walnut, Boulder	0	16	0	0	0	0	0	16	General	Yes	\$4,592,041
Totals	0	27	0	0	0	0	0	27			

* Only units properly completed and occupied in the prior full calendar year under the LNT requirements should be counted in this section. Units included here must serve only families at or below 80% Area Median Income.

** User will select one of the following from the "Population Type" dropdown box: General, Elderly, Disabled, Elderly/Disabled, Other. If "Other" is selected, a description must be provided.

G.3 Comparable Mix (by Family Size) – LNT.

In order to demonstrate that the MTW Statutory Requirement of “maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the MTW demonstration” is being achieved, the MTW Expansion Agency must provide data for the actual families housed under MTW Waiver and associated activities 17.a (LNT Rental Subsidy Program) and 17.c (LNT Housing Development Program) for its most recently completed PHA Fiscal Year (01/01/2025 - 12/31/2025) in the following table.

Family Size:	Number of LNT Families Housed by Household Size
1 Person	559
2 Person	185
3 Person	101
4 Person	63
5 Person	34
6+ Person	30
Totals	972

H	Administrative Information
H.1	Certifications of Compliance The MTW Expansion Agency shall execute the MTW Certifications of Compliance form and submit as part of the MTW Plan-Expansion submission to HUD. Certification is provided below.
H.2	Description of Public Process The MTW Expansion Agency shall provide the beginning and end dates of when the MTW Plan-Expansion was made available for public review and the dates (which must be at least 45 days), the date and location of the public hearing(s), and number of attendees of public hearing(s). HUD reserves the right to request additional information to verify the MTW PHA has complied with public process requirements in the MTW Operations Notice. The MTW Supplement was made available on the BHP website (www.boulderhousing.org) and in our main office from July 24, 2026, through September 9, 2026. Information regarding public hearings, attendance and comments will be included prior to final submission to HUD.
H.3	Lobbying Disclosures The MTW PHA shall provide signed copies of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071).
H.4	Reviews, Audits and Inspections The MTW PHA shall provide a general description of any HUD reviews, audits and/or physical inspection issues that require the MTW PHA to take action in order to address the issue. The 2025 Independent Audit for the MTW/HCV program resulted in one deficiency. The condition was that BHP did not send failed HQS inspection notices within the 5-business-day requirement per the Admin Plan to participants who needed to correct deficiencies. BHP has established a new procedure to ensure that inspection letters are sent in time to ensure that corrections are done within the required timeframe.

MTW 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 MTW Plan-Expansion

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Plan-Expansion for the MTW PHA Fiscal Year beginning (01/01/2027), hereinafter referred to as "the MTW Plan-Expansion", 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 MTW Plan-Expansion and implementation thereof:

- (1) The PHA made the proposed MTW Plan-Expansion and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Plan-Expansion and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Plan-Expansion by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Plan-Expansion.
- (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 MTW Plan-Expansion in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Plan-Expansion 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 applicable PHA 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 MTW PHA's jurisdiction and a description of the way the MTW Plan-Expansion 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 5.150-51, 24 CFR 903.7(o), and 24 CFR 903.15.
- (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, the MTW PHA will not base a determination of eligibility for housing based on marital status and will not otherwise discriminate because of sex
- (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' for people with physical disabilities.
- (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.
- (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 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.
- (16) 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.

- (17) The MTW PHA will keep records in accordance with 2 CFR 200.334-200.338 and facilitate an effective audit to determine compliance with program requirements.
- (18) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (19) 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
- (20) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (21) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Plan-Expansion and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Plan-Expansion. MTW Waivers and associated activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (22) All attachments to the MTW Plan-Expansion have been and will continue to be available at all times and all locations that the MTW Plan-Expansion is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Plan-Expansion 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 MTW Plan-Expansion and will continue to be made available at least at the primary business office of the MTW PHA and must be made available electronically, upon request.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate 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, 1014; 31 U.S.C. §3729, 3802).

Boulder Housing Partners

MTW PHA NAME

C0016

MTW PHA NUMBER/HA CODE

Bob Walker

NAME OF AUTHORIZED OFFICIAL

Chairperson of the Board of Commissioners

TITLE

SIGNATURE

DATE

* *Must be signed by either the Chairperson 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 Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

Instructions for Preparation of Form HUD-50090-EXPANSION, MTW Plan-Expansion

The instructions below detail how to complete the MTW Plan-Expansion. These instructions will not appear in the fillable form or system. All MTW Expansion Agencies must complete each section.

A. PHA Information.

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Fiscal Year End** (MM/DD/YYYY), **MTW Cohort Name**, and **MTW Plan-Expansion Submission Type**.

B. Narrative.

B.1 MTW Plan-Expansion Narrative.

The purpose of this section is to provide narrative information on the MTW Expansion Agency's short and long-term goals and how it plans to further the three MTW statutory objectives.

C. MTW Waivers and Associated Activities.

The MTW Expansion Agency must first go through the table provided in this section that lists all MTW Waivers and associated activities and assign an Activity Status Category to each one.

For those MTW Waivers and associated activities in the "Currently Implementing"; "Planning to Implement (Seeking Approval - First Year)"; and "Planning to Implement (Already Approved - Subsequent Year)" categories, the MTW Expansion Agency must address all of the questions listed:

- *Safe Harbors.* Confirm that the MTW activity meets all of the associated Safe Harbors in the MTW Operations Notice for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver. In order to be approved, the answer to this question must be yes.
- *Statutory Objectives.* Indicate which of the MTW statutory objectives this activity serves; each activity may serve one or more objectives. The three statutory objectives are housing choice, self-sufficiency, and cost effectiveness. Check all that apply.
- *Cost Implications.* State the cost implications of each activity. Choose the best description of the cost implications based on what is known at the time of completing the MTW Plan-Expansion. Indicate which categories best describe the cost implications of the activity from among the following choices: neutral (no cost implications), increased revenue, decreased revenue, increased costs, and/or decreased costs. Check all that apply. For instance, an MTW activity may increase revenue, increase costs, and therefore be cost neutral. Alternatively, an activity may simply increase costs.
- *Hardship policy.* The MTW Operations Notice requires MTW Expansion Agencies to adopt written policies for determining when a requirement or provision of the MTW activity constitutes a financial or other hardship for the family. Whether the activity requires a hardship policy can be found in Appendix I of the MTW Operations Notice. If applicable for the MTW activity, upload/attach the hardship policy associated with this MTW activity. Hardship policies may be applicable to one or multiple MTW activities. The uploaded/attached hardship policy must clearly state which MTW activities it applies to.

If a hardship policy is in place for an MTW activity, the MTW Expansion Agency must report the number and results of hardship requests in the prior PHA Fiscal Year. If the MTW Expansion Agency has not yet implemented the activity, report the number as zero.

- *Impact Analysis.* The MTW Operations Notice requires MTW Expansion Agencies to analyze the various impacts of the MTW activity if it is required for the MTW activity. Whether the activity requires an impact analysis can be found in Appendix I of the MTW Operations Notice. If applicable for the activity, upload/attach the impact analysis associated with this activity. Impact Analyses may be applicable to one or multiple MTW activities. The uploaded/attached impact analysis must clearly state which MTW activities it applies to.

For those MTW Waivers and associated activities in the “Discontinued or To-be Discontinued” category, the MTW Expansion Agency must address the following question:

- *Discontinuation of Activity.* If the MTW Expansion Agency assigns the category “Discontinued or To-be Discontinued” to an MTW activity, the PHA must explain why the MTW activity was or will be discontinued. If the MTW activity has already been discontinued, the PHA must include the final outcomes and lessons learned. If the MTW activity was discontinued in a previous submission year, the PHA must state which year the activity was discontinued in.

D. Safe Harbor Waivers.

D.1: Safe Harbor Waivers seeking HUD Approval. The MTW Expansion Agency must submit the information as described for each Safe Harbor Waiver for which it seeks approval. Additional resources and training on how to submit a Safe Harbor Waiver is available through the HUD Exchange at <https://www.hudexchange.info/programs/mtw/>.

D.2: Safe Harbor Waiver(s) for which HUD Approval has been Received. The set of questions must be answered for each approved Safe Harbor Waiver. Any changes that are considered substantive, at HUD’s discretion, must be approved.

E. Agency-Specific Waivers.

E.1: Agency-Specific Waivers Submitted for HUD Approval. The MTW Expansion Agency must submit the information as described for each Agency-Specific Waiver for which it seeks approval. Additional resources and training on how to submit a Safe Harbor Waiver is available through the HUD Exchange at <https://www.hudexchange.info/programs/mtw/>.

E.2: Agency-Specific Waiver(s) for which HUD Approval has been Received. The set of questions must be answered for each approved Agency-Specific Waiver. Any changes that are considered substantive, at HUD’s discretion, must be approved.

F. Planned Application of MTW Funding Flexibility

F.1: Narrative of MTW Funding Flexibility. MTW Expansion Agencies have the flexibility to apply MTW Funding Flexibility across three core programs’ funding streams – public housing Operating Funds, public housing Capital Funds, and HCV assistance (to include both HAP and Administrative Fees) – referred to as “MTW Funding/MTW Funds.” The MTW Expansion Agency shall provide a thorough narrative of planned activities it plans to undertake using its MTW Funding Flexibility, including estimated amounts. This section is to be used to describe the application of MTW Funding Flexibility that is *not* part of an approved MTW Waiver and associated activity (e.g., The MTW PHA is using its voucher funds to support a public housing re-development).

F.2: LNT Funding Information. If the MTW Expansion Agency is conducting any activities under MTW Waiver and associated activities 17.a (LNT Rental Subsidy Program), 17.b (LNT Service Provision) and/or 17.c (LNT Housing Development Program), the MTW Expansion Agency must populate all applicable information.

G. MTW Statutory Requirements.

General. HUD will verify compliance with the MTW Statutory Requirements covered in G.1, G.2, and G.3 for public housing units and HCV units through HUD systems. Only provide information on LNT families that are not reported in HUD systems. Once HUD systems are capable of capturing this data then this will no longer need to be reported through the MTW Plan-Expansion. For more information on how MTW Statutory Requirements are monitored, see the MTW Operations Notice.

G.1: 75% Very Low-Income. The MTW Expansion Agency must provide data on new admissions only for the MTW Expansion Agency’s most recently completed PHA Fiscal Year for the actual families housed under MTW Waiver and associated activities 17.a (LNT Rental Subsidy Program) and 17.c (LNT Housing Development Program). For instance, an MTW Expansion Agency submitting its MTW Plan-Expansion for its PHA Fiscal Year 2025 (01/01/2025-12/31/2025) must include data for its most recently completed PHA Fiscal Year, which would be the PHA Fiscal Year 2023 (01/01/2023-12/31/2023), as the MTW Plan-Expansion document in that case would be submitted to HUD in October of 2024. Only LNT new admissions should be included in the table. If the MTW Expansion Agency houses no LNT families, then zeros must be input into the table.

G.2: Substantially the Same (STS). The MTW Expansion Agency must provide data for the MTW Expansion Agency’s most recently completed calendar year for the actual families housed under MTW Waiver and associated activities 17.a (LNT Rental Subsidy Program) and 17.c (LNT Housing Development Program). For instance, an MTW Expansion Agency submitting its

MTW Plan-Expansion for its PHA Fiscal Year 2025 (01/01/2025-12/31/2025) must include data for its most recently completed calendar year, which would be 2023 (01/01/2023-12/31/2023), as the MTW Plan-Expansion document in that case would be submitted to HUD in October of 2024. If the MTW Expansion Agency houses no LNT families, then zeros must be input into the table. The additional information on LNT development units must be provided for each actual (not planned) development.

G.3: Comparable Mix (by Family Size). The MTW Expansion Agency must provide data for the MTW Expansion Agency's most recently completed PHA Fiscal Year for the actual families housed under MTW Waiver and associated activities 17.a (LNT Rental Subsidy Program) and 17.c (LNT Housing Development Program). For instance, an MTW Expansion Agency submitting its MTW Plan-Expansion for its PHA Fiscal Year 2025 (01/01/2025-12/31/2025) must include data for its most recently completed PHA Fiscal Year, which would be the PHA Fiscal Year 2023 (01/01/2023-12/31/2023), as the MTW Plan-Expansion document in that case would be submitted to HUD in October of 2024. If the MTW Expansion Agency houses no LNT families, then zeros must be input into the table.

H. Administrative Information.

H.1: MTW Certifications of Compliance. The format for submission of the required MTW Certifications of Compliance is provided in this MTW Plan-Expansion Form. The preamble to the MTW Certifications of Compliance directs the MTW Expansion Agency to fill in the beginning of the PHA Fiscal Year for which the certification is being made. This must be provided as the first day of the PHA Fiscal Year to be covered by the MTW Plan-Expansion. For instance, an MTW Expansion Agency submitting its MTW Plan-Expansion for its PHA Fiscal Year 2025 (01/01/2025-12/31/2025) would use 01/01/2025 in that field.

The MTW Certifications of Compliance must be signed by either the Chairperson or Secretary of the Board of the MTW Expansion Agency's legislative body. This certification cannot be signed by an employee unless authorized by the MTW Expansion Agency Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

The MTW Certifications of Compliance must be submitted to HUD as part of the MTW Plan-Expansion for each annual submission and each amended annual submission.

H.2: Description of Public Process. The MTW Expansion Agency must provide descriptive information of the elements of public process provided.

H.3: Lobbying Disclosures. The MTW Expansion Agency must provide the forms listed, following applicable instructions on the form itself.

H.4: Reviews, Audits and Inspections. The MTW Expansion Agency must provide a description as directed.

CERTIFICATE RELATING TO RESOLUTION #2026-16

I, the undersigned Executive Director of the Housing Authority of the City of Boulder, Colorado (the "Authority"), hereby certify that (i) the attached Resolution of the Authority (the "Resolution") was duly adopted by the Board of Commissioners of the Authority at a meeting thereof duly called and held on _____, 2026 at which meeting a quorum was present and acting throughout, (ii) the Resolution has been compared by us with the original thereof recorded in the minutes book of the Authority and is a correct transcript therefrom and of the whole of said original and (iii) the Resolution has not been altered, amended or repealed, and is in full force and effect on the date hereof.

IN WITNESS WHEREOF, we have hereunto set our hands this _____,
2026.

Jeremy Durham, Executive
Director of the
Housing Authority of the City of Boulder

The Commissioners of the Housing Authority of the City of Boulder met at the offices of Boulder Housing Partners, 4800 Broadway, Boulder, Colorado, 80304, on_____, 2026, commencing at the hour of _____ p.m.

There were present at the meeting, in person or by telephone, the following:

Present:

Chairperson:

Vice Chair:

Other Commissioner:

Absent:

There were also present:

Executive Director:

Jeremy Durham

RESOLUTION #2026-16

A RESOLUTION BY THE HOUSING AUTHORITY OF THE CITY OF BOULDER, COLORADO, A COLORADO HOUSING AUTHORITY (THE "AUTHORITY") TO APPROVE ITS ANNUAL PHA PLAN

WHEREAS, the Authority desires to cause its affiliate, Harvest34 LLLP, a Colorado limited liability limited partnership ("Partnership") to develop a 44-unit affordable housing project at 3125 34th Street, Boulder, Colorado (the "Project") utilizing the Faircloth-to-RAD program under U.S. Department of Housing and Urban Development ("HUD") Rental Assistance Demonstration ("RAD") Restore/Rebuild component;

WHEREAS, in connection with the Project and pursuant to HUD's RAD requirements, the Authority must submit its approved 2027 Annual PHA Plan and any amendments thereto (collectively, the "PHA Plan") to HUD; and

WHEREAS, the Authority's Board of Commissioners has reviewed the PHA Plan and have determined that the approval of the PHA Plan is in the best interest of the Authority and consistent with the applicable RAD requirements.

NOW, THEREFORE, BE IT RESOLVED, that the Authority's Board of Commissioners hereby authorizes Frank Alexander, in his capacity as the Deputy Director of the Authority, or his designees, to take any appropriate actions to approve the PHA Plan;

RESOLVED FURTHER, that Frank Alexander, in his capacity as the Deputy Director of the Authority, or his designee(s), is authorized, ratified and directed to execute, deliver and perform any agreements, contracts or writings as he may deem to be appropriate to facilitate the submission to HUD of certain documents related to the Faircloth-to-RAD conversion, including but not limited to the approved PHA Plan.

RESOLVED FURTHER, that the undersigned may certify to any other party, the names and signatures of the persons who presently are duly elected, qualified and authorized to act on behalf of the Authority pursuant to the foregoing resolution.

RESOLVED FURTHER, that the foregoing resolution is in addition to, and does not limit and shall not be limited by, any resolution heretofore or hereafter adopted by the Authority; and the foregoing resolution shall continue in full force and effect until express written notice of their prospective rescission or modification, as to future transactions that have not been undertaken or committed for, has been received.

RESOLVED FURTHER, that any and all transactions by or on behalf of the Authority prior to the adoption of this resolution is and the same hereby is in all respects ratified, approved and confirmed.

The provisions of this Resolution are hereby declared to be separable, and if any section, phrase or provision shall, for any reason, be declared to be invalid, such declaration shall not affect

the validity of the remainder of the sections, phrases or provisions. All resolutions, orders or parts thereof in conflict with the provisions of this Resolution are, to the extent of such conflict, hereby superseded. This Resolution shall be in full force and effect from and after its passage and approval, in accordance with law.

[Signature Page to Follow]

PASSED, ADOPTED AND APPROVED this _____,
2026.

(SEAL) _____, Chairperson

Attest:

Jeremy Durham
Executive Director

43333457v2

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires: 09/30/2027

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Kurt Firnhaber, the Housing and Human Services Director, City of Boulder
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal
year 2027 of the CO016 Boulder Housing Partners is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including any applicable fair housing goals or
strategies to:

2025-2029 Boulder Broomfield Regional HOME Consortium: Cities of Boulder & Longmont, Boulder County, City/County of Broomfield
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR Part 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan
or State Consolidated Plan.

The goals of the Consolidated Plan include: Increase the amount and affordability of the rental housing for the Consortium's lowest income renters, specifically for households with incomes below 50% of the AMI. Housing data shows a shortage of 14,364 units for residents with less than \$35,000. Boulder Housing Partners plans to utilize the Restore/Rebuild Program in partnership with the Low-Income Housing Tax Credit program to ensure deep rent affordability for the future units in development.

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, 1014; 31 U.S.C. §3729, 3802).

Name of Authorized Official:	Title:
<u>Kurt Firnhaber</u>	<u>Housing and Human Services Director, City of Boulder</u>
Signature:	Date:

This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.