



2015 MOVING TO WORK

ANNUAL PLAN



**Boulder
Housing
Partners** 
Providing Homes, Creating Community, Changing Lives

Boulder Housing Partners

Boulder Housing Partners (BHP) provides assistance to nearly 2,000 households through five housing programs. The agency's portfolio represents one third of the affordable housing units in Boulder County. In 2009, BHP's Board of Commissioners endorsed a goal to make BHP the nation's first net-zero energy housing authority.



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Boulder Housing Partners

2015 MTW Annual Plan

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Section I: Introduction

Short-Term and Long-Term Goals and Objectives

Boulder Housing Partners (BHP) became part of the Moving to Work Demonstration Program in 2012. This 2015 plan describes our plans for our fourth year in the demonstration.

When Congress created MTW in 1996, it clearly stated its objectives for the demonstration and Public Housing Agencies (PHAs) participating in it. These objectives are:

- To reduce cost and achieve greater cost effectiveness in federal expenditures;
- To give incentives to families with children whose heads of household are either working, seeking work, or participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and
- To increase housing choices for low-income families.

These objectives form the centerpiece of BHP's MTW initiatives, along with two additional goals that are unique to Boulder's needs:

- Pilot a rent policy that will encourage self-sufficiency, assure accurate reporting of income and ensure that customers are not overly rent burdened; and
- Preserve, transform and revitalize our public housing.

Over the past three years, both BHP and our customers have experienced the potential of MTW flexibility to streamline process and reduce regulatory burden related to our customer experience. In 2012 we implemented:

- Rent reform for elderly households and households with persons with disabilities;
- Rent simplicity measures for all households;
- Voucher reform for all households: elimination of the 40% cap on income and implementation of a flat utility allowance; and
- Public housing conversion with the submission of a proposal to HUD to convert the balance of our public housing to conventional financing supported by project-based vouchers.

In 2013, we:

- Simplified the Housing Quality Standard (HQS) Inspections schedule for all households;
- Began the phase-in period of eliminating Utility Reimbursement Payments for all households;
- Commenced a new Local Voucher Program in Partnership with Safehouse Progressive Alliance for Non-Violence; and
- Paved the way for BHP to use Replacement Housing Factor Funds for other Affordable Housing.

In 2014, we:

- Received approval to convert our public housing to a Section 8 platform which will allow for substantial renovation and transformation of the asset using both the traditional public housing disposition program with the Rental Assistance Demonstration (RAD) program in order to address the needs of the entire public housing inventory;
- Simplified the rent calculation for work-abled families in the Section 8 Housing Choice Voucher Program;
- Removed interim recertifications for all families to remove the disincentive to increase income, while mimicking the market in cases of income losses;

- Eliminated the option to pay flat rent in public housing when rent based on income is higher than the flat rent;
- Made changes to the mobility options for families participating in the Family Self-Sufficiency Program at Woodlands; and
- Created an easier process to set rent limits and rent reasonableness for our Project-Based Vouchers.

In our short experience, we have come to understand that MTW flexibility will allow us to truly become a strategic organization by allowing us the flexibility to evaluate our opportunities and our challenges and respond. Our 2015 Plan does not include many new activities, as the majority of the year will be focused on public housing conversion. Conversion will occur through use of the traditional Section 18 disposition program for 150 of our units located at Kalmia and Walnut Place, and 172 units will convert using the Rental Assistance Demonstration (RAD) Program. These units include Diagonal Court, Iris Hawthorn, Madison, Manhattan, and Northport. This Plan provides detail on the following proposed activities:

- 2015 – 1: Affordable Housing Acquisition and Development Fund
- 2015 – 2: Project-Based Voucher Applicant Processing

To frame our long-term thinking, Boulder Housing Partners continues to use five overarching MTW goals detailed below. In addition BHP has developed the following principles that have guided our MTW plan. With MTW flexibility, BHP plans to be able to:

- Use federal housing resources as compelling tools to create positive change for families,
- Manage converted public housing as a real estate asset and a vital part of our community's infrastructure,
- Encourage the community, and our prospective customers, to perceive public housing as a place to Live, Learn, and Earn,
- Accelerate the shift of staff focus from paper to people,
- Complete the transformation of a public agency from bureaucratic to entrepreneurial,
- Accelerate changes in outcomes for families from tepid to catalytic,
- Enhance our role in the industry from thinkers to doers, and
- Provide a more complete continuum of housing choices.

Our long-term goals and expectations are described below. The Moving to Work program has three statutory goals. BHP's program includes an additional two goals that better articulate our program, and are consistent with the statutory goals. Not every item listed below requires MTW flexibility. We include these items in order to tell a more complete story of what we are trying to achieve.

Goals in Year Four (2015) are also described in detail below in the discussion about proposed MTW Activities.

MTW Goal 1

Reduce cost and achieve greater cost effectiveness in federal expenditures

In Years 1 – 3 (2012, 2013 and 2014), we:

1. Streamlined and simplified the rent calculation and re-certification process for elderly households and people with disabilities,
2. Simplified the process for income and asset verification for all households,
3. Implemented a 26.5% of rent with no deductions for elderly households and people with disabilities, replacing the complicated 30% of income-with-adjustments-to-rent system,
4. Implemented a flat utility allowance,
5. Excluded income from assets with a value less than \$50,000 and disallowed participation for households with assets greater than \$50,000,
6. Created an MTW Resident Advisory Committee to assist us in longer-term thinking and program evaluation,
7. Structured our evaluation metrics and benchmarks,
8. Implemented an HQS inspection schedule that follows the recertification schedule,
9. Implemented a flat tiered rent program for families in the Section 8 Housing Choice Voucher Program, including the design of a rent reform study (implemented in year 3), and
10. Created an easier process to set rent limits and rent reasonableness for our Project-Based Vouchers.

In 2016 and beyond (Years 5 – 10), we expect to:

1. Make standard documents more customer friendly

The focus will be the legal documents associated with the programs beginning with the lease and the HAP contract. Customers currently find the documents cumbersome and difficult to follow. The result is that they miss the key requirements and suffer the consequences.

2. Make the voucher program lease length more flexible

Many university towns, like Boulder, have a leasing season centered on the school year. This creates many situations in which a landlord is unwilling to sign a one-year lease.

3. Revise and simplify our portability policy

The industry has long discussed a variety of needed changes to the administration of portable vouchers. We would like to use MTW flexibility to experiment with a number of ideas that would make local administration more streamlined.

MTW Goal 2

Create incentives for families to work, seek work or prepare for work

In Years 1 – 3 (2012, 2013 and 2014), we:

1. Streamlined and simplified the rent calculation and re-certification process for households with earned income,
2. Simplified the process for income and asset verification for all households,
3. Completed our planning to implement a flat tiered rent program for work-abled families in the Section 8 Program,
4. Completed our planning for rent reform for the work-abled families in the Public Housing Program,
5. Implemented rent reform for work-abled families in the Section 8 and Public Housing Programs, and
6. Eliminated all interim recertifications (with the exception of allowing elderly and disabled households once interim decrease per year) which allows households to increase income without the immediate corresponding increase in rent.

In 2015 (Year 4), we plan to:

1. Complete planning for our resident mobility program, and
2. Complete planning for community center construction and be in the process of creating a service delivery center at three more of the family housing sites.

In 2016 and beyond (Years 5 – 10), we expect to:

- 1. Expand the staffing of our Resident Services program.**

With increased efficiencies created under MTW, our goal is to expand the staffing of our Resident Services Program so that every public housing resident is assigned a service coordinator and voucher households will begin to have access to the Resident Services Department.

- 2. Expand the program that provides college tuition to BHP students participating in the ‘I Have A Dream’ program partnership.**

The I Have A Dream (IHAD) program continues to affirm its intention to place a classroom of “Dreamers” at every public housing site that can accommodate their classroom programming needs. In other words, if we build it, they will come. We are strongly committed to doing everything we can to make this opportunity available for the children and young adults of our communities.

- 3. Expand our Community Service and Section 3 programs to build social capital by greater involvement in the community.**

BHP residents who have long been out of the workforce need to update their skills and experience and build networks in order to make re-entry possible and successful. We propose to

expand our community service and Section 3 programs by developing a pre-employment training program.

4. Create a system to reward households for progress towards self-sufficiency.

BHP will work with residents to create a system that rewards their progress towards self-sufficiency and their efforts to make their home and neighborhood a better place to live. We will work with residents to create this system. We suggest that we model it after the Cornerstone Rental Equity program¹. This program matches many of the ideas we have about enhancing the benefits of renting a home and engaging residents in building equity.

5. Expand our current work with the Bridges Out of Poverty program.

The Bridges Out of Poverty model examines the sources and impact of generational poverty on families, reveals the hidden rules and norms of social class, and supports families as they learn how they can change their behavior to embrace a mental model of prosperity. BHP wants to use MTW to test the part of the theory that housing solutions will be compromised unless we are addressing the intrinsic beliefs that people hold about being poor.

MTW Goal 3

Increase housing choices for low-income households

In Years 1 – 3 (2012, 2013 and 2014), we:

1. Removed the cap on income spent on rent in the voucher program,
2. Used MTW funding flexibility to create 31 newly constructed units of permanent supportive housing for chronically homeless individuals, and
3. Implemented both minimum and maximum time limits at Woodlands, a Project-Based Voucher Community with services provided by the Family Self-Sufficiency Program.

In 2015 (Year 4), we plan to:

1. Design a process to test mobility for residents from a Multi-Family Property with a Section 8 Project-Based Contract using Section 8 Housing Choice Vouchers (which will be proposed as an activity in a future MTW Annual Plan).

¹ Cornerstone Renter Equity is a management system where residents have a stake in the property where they live by using their contributions to maintain and improve property values and rental income with compensating financial equity. Residents sign a contract with Cornerstone that enables them to earn up to \$10,000 in financial equity in ten years, provided they complete routine work assignments, attend management meetings, and fulfill lease commitments. Residents receive a monthly statement of their earnings, but they must stay in their homes for five years before their credits are vested and are eligible for cash payments. After becoming vested in the Renter Equity Fund, individuals may borrow up to 80% of the value of their credits for any reason.

In 2016 and beyond (Years 5 – 10), we expect to:

- 1. Increase the cap on project-basing vouchers to dedicate up to 60 vouchers for housing for individuals re-entering the community following homelessness or incarceration.**

BHP has seen the need to provide a supportive setting in which people can re-gain skills to live more successfully in the community.

- 2. Use resources leveraged from the conversion of public housing, along with MTW flexibility, to create at least 100 new affordable units renting to families at 40% of the area median income.**

Another critical gap in the housing continuum is the lack of options for households ready to move off of federal housing subsidy. Using the flexibility provided to us under the MTW program we propose to increase our Boulder Affordable Rentals inventory by 24%.

- 3. Implement a damage claim for landlords participating in the voucher program.**

A key component of our MTW plan is to make the voucher program more attractive to private landlords. As part of a recruitment tool, we propose to use HAP funds to create a fund for damage claims.

- 4. Create a Section 8 homeownership program in partnership with the city of Boulder and Thistle Community Housing.**

Creation of a homeownership program may not require MTW flexibility, but doing so will round out the critical interventions that BHP can make in the housing ladder. We propose to partner with Thistle Community Housing because of their long track record of developing affordable homeownership opportunities. Thistle is Boulder's largest non-profit housing developer specializing in mixed-income homeownership opportunities and community land trust development.

- 5. Test a shallow subsidy program**

In order to increase the number of families that can be served with the limited funding that we receive, BHP would like to test a shallow subsidy program. The goal would be to provide families who are not currently receiving Section 8 Housing Choice Voucher assistance with a fixed amount on a monthly basis and determine if this would be sufficient to keep them stable and housed.

- 6. Reduce the waiting time between application and an offer of housing**

The demand for housing assistance greatly outweighs the supply that is available. Many applicants are looking for immediate housing assistance, and cannot be found even a few months after applying for the lottery or wait lists. We would like to find a way to shorten the waiting time between when an applicant is in need of housing assistance and actually receives it.

MTW Goal 4

Pilot a rent policy that will encourage self-sufficiency, assure accurate reporting of income and ensure that customers are not overly rent burdened

In Years 1 – 3 (2012, 2013 and 2014), we:

For elderly households and people with disabilities:

1. Adopted a simplified rent based on 26.5% of gross income,
2. Eliminated all deductions,
3. Excluded income from assets below \$50,000,
4. Began scheduling re-certifications so that they will occur every three years,
5. Eliminated third-party verifications except at admissions and for audited files,
6. Eliminated all interim increases, except for increases in unearned income, and
7. Limited to one the number of interim decreases.

For family households:

1. Excluded income from assets below \$50,000,
2. Eliminated third-party verifications except at admissions and for audited files,
3. Eliminated earned income disregard and interim recertifications for increases in income,
4. Implemented a flat tiered rent system for work-abled families in the Section 8 program, which includes biennial recertifications,
5. Implemented a rent reform study to test the outcomes and effects of our rent reform,
6. Removed the flat rent choice in Public Housing to ensure that all families are paying rent according to income, and
7. Eliminated all interim recertifications for all households (with the exception of one decrease per year for elderly and disabled households).

In 2015 (Year 4), we will:

1. Evaluate the rent reform study for the alternate rent strategies,
2. Monitor the new rent structures for all households,
3. Continue to monitor the Safety Net which was created to mitigate the effects of elimination of interim recertifications, and
4. Plan for the flat tiered rent to be rolled out to all work-abled families in the converted public housing properties.

In 2016 and beyond (Years 5 – 10), we expect to:

1. Continue to evaluate the rent reform study for the alternate rent strategies, and
2. Monitor and evaluate the new rent structures for all households.

MTW Goal 5

Preserve, transform and revitalize our public housing

In Years 1 – 3 (2012, 2013 and 2014), we:

1. Simplified the process to project base vouchers, and
2. Received approval for our combined application to HUD for conversion of our public housing through the traditional disposition program and the Rental Assistance Demonstration (RAD) Program.

In 2015 (Year 4), we expect to:

1. Be very busy completing the financing package, finalizing renovation plans and managing the entitlements for public housing property. This will culminate in actual renovation and conversion occurring in the second half of 2015, and
2. Use our MTW flexibility to project base vouchers at the converted public housing units through disposition (while the units converted under the RAD Program will become Project Based Vouchers, outside of the MTW program).

In 2016 and beyond (Years 5 – 10), we expect to:

- 1. Test three mobility options for families in the converted public housing properties: none, full and conditional.**

BHP wants to use MTW flexibility to test whether families who are able to move with vouchers will achieve greater outcomes than those whose mobility is limited.

Section II: General Housing Authority Operating Information

The following tables describe Boulder Housing Partners housing options under the Public Housing and Section 8 Housing Choice Voucher Programs. There are currently 337 total units in the public housing program and 608 vouchers in the voucher program. At the beginning of 2015, BHP has 120 vouchers that are project-based vouchers. By the end of 2015, we anticipate having plans in place to project-base an additional 133 tenant protection vouchers at two converted public housing sites, specifically Kalmia and Walnut Place. The timing of public housing conversion is dependent on financing and actual renovation of the projects, which will be a major focus of BHP in 2015.

A. MTW Plan: Housing Stock Information											
Planned New Public Housing Units to be Added During the Fiscal Year											
AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6 +			Fully Accessible	Adaptable
None	X	X	X	X	X	X	X	X	Type Noted *	X	X
Total Public Housing Units to be Added								0			
* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other											
If Other, please describe: Description of "other" population type served											
Planned Public Housing Units to be Removed During the Fiscal Year											
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal									
CO016333333 Family Sites	177	122 through RAD, 55 through Section 18									
CO016777777 Senior Sites	145	50 through RAD, 95 through Section 18									
Total Number of Units to be Removed	322										
New Housing Choice Vouchers to be Project-Based During the Fiscal Year											

Property Name	Anticipated Number of New Vouchers to be Project-Based *	Description of Project
Walnut Place	80	Converted public housing property through Section 18 disposition, 80 units planned for the elderly and persons with disabilities
Kalmia	53	Converted public housing property through Section 18 disposition, for mixed population
Anticipated Total New Vouchers to be Project-Based	133	<p>Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year</p> <p>Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year</p>
		<p>253</p> <p>253</p>

*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.

Other Changes to the Housing Stock Anticipated During the Fiscal Year

No other changes are anticipated to be made during the 2015 Fiscal Year.

Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.

General Description of All Planned Capital Fund Expenditures During the Plan Year

BHP has been approved for disposition of all public housing except for Arapahoe Court through Section 18 and RAD. This transaction is expected to close mid-2015. Major renovations of the properties will occur once the properties have been sold to the tax credit entity. We expect minimal use of capital funds for capital projects in 2015 other than some predevelopment expenses in preparation for the disposition transaction and to potentially close a gap in financing for the disposition transaction.

II.2.Plan.Leasing

B. MTW Plan: Leasing Information

Planned Number of Households Served at the End of the Fiscal Year

MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied / Leased** *
Federal MTW Public Housing Units to be Leased	14	168
Federal MTW Voucher (HCV) Units to be Utilized	608	7,296
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	0	0
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0
Total Households Projected to be Served	622	7464

* Calculated by dividing the planned number of unit months occupied/leased by 12.
 ** In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.
 ***Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

Reporting Compliance with Statutory MTW Requirements

If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.

BHP is currently in compliance.

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions

Housing Program

Description of Anticipated Leasing Issues and Possible Solutions

Public Housing
Section 8 HCV Program

When units are converted under disposition/RAD, a level of rehabilitation will be done at the properties causing leasing issues during the actual rehab, currently scheduled for 2015.

Leasing issues may arise depending on actual funding provided under budget authority, as well as number of tenant protection vouchers received under disposition.

II.3.Plan.WaitList

C. MTW Plan: Wait List Information

Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed** *	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Public Housing Units	Community wide for all of public housing	170	Closed	No
Federal MTW Housing Choice Voucher Program	Program specific for S8HCVP only (BHP conducts a lottery, not a wait list)	Zero	Closed	Yes
Federal MTW Housing Choice Voucher Program	Site-based for PBV Broadway East	71	Closed	No

Rows for additional waiting lists may be added, if needed.

* *Select Housing Program:* Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

** *Select Wait List Types:* Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

*** For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

N/A

If Local, Non-Traditional Housing Program, please describe:

N/A

If Other Wait List Type, please describe:

N/A

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

With PH Disposition and RAD Conversion to occur in 2015, current public housing units will undergo renovation. Units will need a varying degree of renovation, which will determine the length of relocation for current residents. The majority of relocations should be temporary and may include the use of hotels and vacant units. Some units will require a longer relocation time frame. More information can be found in Appendix B, RAD Amendment. The current wait list for public housing will be converted to the RAD wait list upon completion of renovations.

Justification for Disposition/RAD conversion

Note: Approval for conversion through Public Housing Disposition and RAD was received in 2014; however, units will not be removed from Public Housing until 2015.

As part of our Moving to Work Plan, we propose to dispose some sites outside of the public housing program and convert the rest under RAD in order to effectively utilize our public housing as a platform from which to deliver MTW-envisioned services; and to enable the full rehabilitation of these sites, ensuring their long-term viability as affordable housing for low income families and individuals. The disposition, conversion to project-based voucher subsidy and RAD, and rehabilitation are essential to achieving HUD’s goals for Moving to Work Demonstration Agencies: the opportunity to design and test innovative, locally-designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, increase housing choices for low-income families.

The preservation, transformation and revitalization of our public housing through disposition, conversion and rehabilitation is one of BHP’s central goals for us as a Moving to Work agency. We plan to finance a robust resident services program through the annual operating structure of these sites, which will allow us to “achieve 100% service enrichment at all of our public housing properties”.

By disposing of and/or converting these eight sites, BHP will be able to use various affordable housing financing tools to perform comprehensive rehabilitation at the eight sites. Rehabilitation will be supported through the sale of 4% low income housing tax credits (LIHTC) and private activity bonds (PAB). BHP’s anticipated level of rehabilitation for these eight sites would not be possible utilizing Capital Funds or other funding mechanisms associated with the public housing program. Leveraging the sale of LIHTCs in combination with private activity bonds is the most effective mechanism for enabling this level of rehabilitation while still providing affordability. Rehabilitation will eliminate any deferred maintenance and will bring substantial capital improvements to the sites, reducing the site’s ongoing maintenance costs. Any energy and water efficiency measures included as part of the rehabilitation will reduce monthly energy bills, improving the operating performance of these sites and maintaining the affordability of this housing for our residents. Rehabilitation at the family sites will allow us to refurbish units into viable community gathering spaces, another BHP goal under Moving to Work.

These community centers will support after-school programming for youth and a place for their parents to meet. The project financing will allow BHP to fund substantial replacement reserves, to prepare for the future needs of these sites. In addition, the improvements performed will make the sites more desirable places for our residents to call home.

At disposition or conversion to RAD, some housing will be converted into BHP's project-based voucher program and others will be converted into RAD project-based voucher contracts which will support comparably affordable rents for low-income families and individuals into the future. The historic level of subsidy plus rent that BHP has received from these sites under the public housing program has been lower than needed in order to bring significant capital improvements, operating reserves, and service-enrichment to all residents at all sites. Participation of these eight sites in the project-based voucher program and RAD's project-based contracts will secure the sites' operating stability in the long-term by generating more rental and subsidy revenue at these eight sites to be used for future operations, capital investment and resident services. The rental subsidy offered under the project-based programs will preserve the sites as affordable housing for the community.

Section III: Proposed MTW Activities

Activity 2015 – 1: Affordable housing acquisition and development fund

A. MTW Initiative Description

With this activity, Boulder Housing Partners will use its MTW funds and its development experience to support affordable housing acquisition and development in the City of Boulder. BHP will seek and pursue opportunities to build new rental housing units as well as to acquire existing land and/or units and construct or rehabilitate them as necessary.

BHP currently owns, manages or controls approximately 1,000 units of affordable rental housing across the city, almost all of which are affordable to very low and extremely low income residents. BHP's goal in this activity is to increase the supply of quality housing that is available to low, very low, and extremely low income residents of the City of Boulder. BHP will pursue this goal through a variety of methods and will strive to serve a range of resident populations (including but not limited to persons with disabilities, senior, foster youth, homeless, and extremely low income households).

To maximize its potential for success, BHP may use its MTW flexibility to purchase land and/or improvements, or participate in project ownership/development by providing financial support, or contribute on direct construction or rehabilitation costs. BHP may leverage, where possible, additional funds from private and public sources (including Low Income Housing Tax Credits). In its projects, BHP will pursue, where appropriate, partnerships with funders that support energy conservation and renewable energy in building design. Costs of site acquisition and construction or rehabilitation of sites may be borne directly by BHP or in a joint venture with another developer/partner.

B. MTW Statutory Objective

This activity will increase housing choices for low income families.

C. Anticipated Impacts

The broader use of funds authority under BHP's MTW Agreement makes this initiative possible. At a time when federal, state and local sources of funds for affordable housing are shrinking, this activity will enable BHP to jumpstart the creation and preservation of desperately needed low-income rental housing units in Boulder. The activity is expected to lead to the development of 7-10 units or rehabilitation of 25-30 units over 10 years, with affordability for low-income residents and an affordability restriction on the properties of up to at least 50 years depending on the final list of funding sources.

As an experienced and successful developer of affordable housing and as an MTW agency, BHP is in a unique position to take a variety of actions to generate more development activities in Boulder. Some otherwise viable projects initiated by community developers are slowed or stalled in the City's

development process due to the complexity of the regulatory structure and funding needed to deliver affordable housing units; BHP can step in and support projects so that they can get fully entitled and approved for affordable housing.

D. Anticipated Schedule

Based on the expected funding of Replacement Housing Factor funds over five years we would expect to look at opportunities for investment over a 10-year period pursuant to our strategic plan for growth of the affordable portfolio. This type of investment is opportunity driven such that BHP will take advantage of the best opportunity which may result in the accumulation of funds for several years prior to investment. These funds would be committed to this activity pursuant to an annual Board resolution.

E. Activity Metrics Information

Metric	Baseline	Benchmark	Implementation schedule
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	0	7-30	All units in years 6 -10 after full pool of resources is established, sooner based on opportunities
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	0	7-30	All units in years 6 -10 after full pool of resources is established, sooner based on opportunities

F. Data Source for Metric Data

Data related to this activity will be collected at least annually from development records and budget/actual expenditure reports. As this activity is implemented, BHP may revise the activity’s metrics and further quantify and refine its performance baselines and benchmarks.

G. Authorization Cited

This proposed activity is authorized under BHP’s Moving to Work Agreement, Attachment D – Use of Funds.

H. Explanation for Authorization

MTW flexibility is needed in order to spend MTW funds on other local, traditional affordable housing, outside of Public Housing and Section 8.

I. Additional Information for Rent Reform Activities

This is not a rent reform activity, no additional information is necessary.

Activity 2015 – 2: Project-Based Voucher Applicant Process

A. MTW Initiative Description

Boulder Housing Partners' current portfolio includes project-based vouchers at various sites, the majority of which offer a high level of services. The goal of project-basing vouchers at communities is to provide a wide breadth of services to residents, while maintaining a deep level of affordability. The objective of this activity is to allow applicants to be chosen by the service provider or the owner of the property, which will provide for a quick turn around on a vacant unit and choosing an applicant who will fit the community and benefit from the services provided.

The current communities that have project-based vouchers include 1175 Lee Hill, Broadway East, Holiday McKinney, and Woodlands. BHP currently has a partnership with several community service agencies to offer in-depth case management services. This activity would allow the service partner, in conjunction with the owner, to manage the wait list for applicants who are interested in the property and eligible to receive services. The partner at Holiday McKinney is Mental Health Partners, and these ten units provide another step in the continuum of housing towards independent living that is offered to clients of Mental Health Partners. Woodlands is managed in partnership with the Boulder County Family Self-Sufficiency Program, and residents receive intensive case management services over a period of five years during which they work towards self-sufficiency. The Boulder Shelter for the Homeless is our partner at 1175 Lee Hill and provides case management services based on the Housing First Program. Broadway East is home to an I Have A Dream (IHAD) Classroom, which provides school support for children starting in fourth grade until they graduate college.

BHP will gain administrative efficiency with this activity, while also providing greater choice in housing opportunities. The largest property with project-based vouchers is 44 units. The average turnover since 2008 when vouchers were project-based at Broadway East is nine units per year (20%). When the wait list has been opened, we receive an average of 200 applicants or more. Due to such a low turnover, the wait list goes stale very quickly, and the time it takes to find an applicant who is still interested increases greatly. BHP believes that by transitioning the wait list to the service partner or owner will provide for a quicker turn around time, while providing housing to applicants who are in need of the services offered at the community.

B. MTW Statutory Objective

This activity will reduce cost, increase administrative efficiency and provide faster housing choices for low income families.

C. Anticipated Impacts

We anticipate this activity to decrease average time that a unit is vacant and decrease the number of turnovers by offering the unit to an applicant who is familiar with the community partner and is in need of the services offered.

D. Anticipated Schedule

This activity will be implemented upon approval of this MTW Annual Plan, as soon as all current wait lists are depleted.

E. Activity Metrics Information

Metric	Baseline	Benchmark	Implementation schedule
Total cost of task in dollars (decrease) to maintain wait list.	\$2,340 (90 hours per year x \$26 per hour)	\$0 (as no wait list will be maintained by PHA)	
Total time to complete the task in staff hours (decrease).	90 hours	15 hours (only time needed to process applicants, no wait list management)	
Average applicant time on wait list in months (decrease).	31.5 months	2 months	

F. Data Source for Metric Data

Data related to this activity will be collected at least annually from internal BHP reports and from partner agencies and owners of PBV properties.

G. Authorization Cited

Attachment C. Section D. 4. Waiting List Policies. The Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations.

H. Explanation for Authorization

MTW flexibility is needed in order to shift the wait list from the PHA to the partner agency or the owner of the property.

I. Additional Information for Rent Reform Activities

This is not a rent reform activity, no additional information is necessary.

Section IV: Approved MTW Activities

Implemented

Activity 2012-1: Rent simplification specifically for elderly households and people with disabilities

The main objective of this activity was to simplify the rent calculation for elderly households and persons with disabilities who are living on a fixed income. This activity focuses on four areas: 1) rent based on 26.5% of gross income; 2) triennial recertifications; 3) income disregard and 4) a limit on interim decreases. This activity was approved and implemented in 2012.

Activity 2014-3 will limit interim decrease recertifications to one per year during the triennial recertification cycle and eliminate all interims for any increase in income, including new sources. All other aspects of this activity remain in effect. No other significant changes are being made.

Activity 2012-2: Rent simplification specifically for family households

This activity aims to simplify the rent calculation for family households by eliminating all interim increases, eliminate earned income disregard, and planning for a flat tiered rent system. This activity was approved and implemented for 2012.

Activity 2014-1 eliminated all interim recertifications. As part of Activity 2012-3, elimination of earned income disregard remains in effect.

Activity 2012-4: Rent simplification for all households

The goal of this activity was to implement a series of changes to simplify the income and asset verification process for all families. This activity was first identified and approved for 2012 and included allowing households to provide asset and income documentation; exclude income from assets and allow for self-certification of assets that total \$50,000 or less; and limit asset totals to \$50,000 or less upon admissions to the public housing and Section 8 program. This activity was approved and implemented for 2012.

BHP does not anticipate any changes to the activity or metrics in 2015.

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

The goal of this activity was to provide more rental choices to Section 8 voucher holders with their voucher by eliminating the 40% of income towards rent cap when they initially lease up. This activity was approved and implemented in 2012.

BHP does not anticipate any changes to the activity or metrics in 2015.

Activity 2012-6: Implement a flat utility allowance for the voucher program

This activity's main objective was to increase voucher holder's ease of understanding of the rent calculation and how utilities affect the maximum contract rent allowed. This activity was approved and implemented in 2012.

BHP does not anticipate any changes to the activity or metrics in 2015.

Activity 2013-1: Housing Quality Standards Inspection Schedule

The main objective of this activity was to replace Activity 2012-7. This activity aligns the HQS inspection with the recertification schedule. In 2013, for all households who are elderly or a person with disabilities, the inspection schedule now follows the recertification schedule which is conducted every three years. In 2014, inspections for the work-abled family households were aligned with the recertification schedule. This activity was approved and implemented in 2013.

BHP does not anticipate any changes to the activity or metrics in 2015.

Activity 2013-3: Eliminate Utility Reimbursement Payments

The focus of this activity was to ensure that all public housing residents and Section 8 participants are contributing towards their rental payment (or at a minimum to ensure that residents and participants are not receiving payment to live on housing assistance). Households who had been receiving a utility reimbursement payment (URP) in April 2013 were grandfathered in for 12 months. No new instances of URP were allowed after April 1, 2013.

BHP does not anticipate any changes to the activity or metrics in 2015.

Activity 2013-3: Local Voucher Program in Partnership with Safehouse Progressive Alliance for Nonviolence

This activity focuses on continuing BHP's partnership with Safehouse Progressive Alliance for Nonviolence (SPAN). The activity, which provides eight families who are victims of domestic violence with housing assistance through BHP and case management services through SPAN, allows BHP to use vouchers for transitional housing. This activity was approved and implemented in 2013.

BHP does not anticipate any changes to the activity or metrics in 2015.

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

This activity allows BHP to use Replacement Housing Factor (RHF) Funds to build other affordable housing units. In 2014, BHP used RHF Funds at 1175 Lee Hill, a 31-unit community for chronically homeless using the Housing First model. These units were completed and fully leased by the end of 2014.

BHP does not anticipate any changes to the activity or metrics in 2015.

Activity 2014-1: Rent reform for Section 8 Work-Abled Families

All Section 8 work-abled families (with the exception of those families participating in the Family Self-Sufficiency Program at Woodlands) were transitioned to a flat tiered rent effective August 1, 2014. This included an increased minimum rent (which was grandfathered in for 12 months), no interim recertifications unless there are extenuating circumstances surrounding the loss of income, a flat fee per ineligible family member, and biennial recertifications (the next regularly recertification will be effective August 2016).

BHP does not anticipate any changes to the activity or metrics in 2015. This activity may have some changes proposed in 2016, as the converted public housing families will transition to the flat tiered rent system.

Activity 2014-3: Limit of One Interim Decrease Recertification per year for Elderly Households and Persons with Disabilities

This activity was implemented and written to allow for one decrease per year following the loss of an income source for elderly households and persons with disabilities. Under the current rent reform structures, no interims are processed when there is an increase in income, and for work-abled families no interim recertifications are processed when there is a loss of income, except in cases of extenuating circumstances.

BHP does not anticipate any changes to the activity or metrics in 2015.

Activity 2014-4: Removal of Flat Rent Option for all Public Housing Households

The goal of this activity was to ensure that all public housing households were paying rent according to their income, and not allowed to choose the flat rent option in cases where their rent based on income was higher. Households were given six months' notice of what their rent would be based on their income and the new rent went into effect at their next regularly scheduled recertification.

BHP's inventory of public housing units will be greatly reduced by the end of 2015. However, this activity will remain in effect for the remaining public housing units at Arapahoe Court. No changes to the activity or metrics are anticipated for 2015.

Activity 2014-5: Changes in mobility options for the Woodlands Family Self-Sufficiency Program

This activity changed the mobility options for households living at Woodlands, a Project-Based Voucher community. Households must remain at the property for a minimum of three years, and a maximum of five years prior to requesting the next available voucher. The household must also be in good standing with the Family Self-Sufficiency Program in order to receive the next available voucher.

BHP does not anticipate any changes to the activity or metrics in 2015.

Activity 2014-6: Rent Limits and Rent Reasonableness for Project-Based Vouchers

This activity allows BHP to use market studies to establish appropriate rent limits in project-based voucher projects and conduct its own rent reasonableness procedures for setting rents at Project-Based Voucher (PBV) Communities.

BHP does not anticipate any changes to the activity or metrics in 2015.

Not Yet Implemented

Activity 2012-1: Allow BHP to commit project-based vouchers to cover 100% of the units at converted public housing developments

This activity was first identified and approved for 2012. This activity includes the flexibility to waive the 20% cap on project-based vouchers, define excepted units and create a local project-based voucher program for former public housing sites. In June 2014, BHP received approval for public housing conversion using Section 18 disposition and RAD. No additional vouchers were project based in 2012, 2013 or 2014. With approval in 2014, we anticipate using the flexibility under this activity in 2015. BHP will work to complete the financing, begin planning the renovations, and schedule the work to begin in 2015, at which time the vouchers would also be project-based at the converted public housing sites.

BHP does not anticipate any changes or modifications to this activity, nor are different authorizations needed from what was initially proposed.

On Hold

BHP does not have any approved activities that are on hold.

Closed Out

Activity 2012-7: Implement a landlord self-certification system for HQS inspections for the voucher program

This activity was not implemented. When the activity was written, the objective was to reduce the frequency of inspections for those participants and landlords who were in compliance with HQS inspections and had been for the past year or more. When it came time to implement the activity, it became apparent that the responsibility of certifying to the standards would put a burden on the landlords, as well as the agency to ensure that landlords were completing the forms and returning them. The activity was re-written and approved in the 2013 MTW Annual Plan under Activity 2013 – 1. The new activity will allow the inspection cycle to follow the recertification schedule.

Activity 2014-2: Rent Reform for Public Housing Work-Abled Families

BHP received approval for conversion of the Public Housing units through the Section 18 disposition and RAD program, therefore this activity was not implemented. Through conversion, the properties will be Project Based Vouchers and these families will fall under the rent reform structure laid out in Activity 2014-1: Rent Reform for Section 8 Work-Abled Families.

Section V: MTW Sources and Uses of Funds

Annual MTW Plan

V.1.Plan.Sources and Uses of MTW Funds

A. MTW Plan: Sources and Uses of MTW Funds

Estimated Sources of MTW Funding for the Fiscal Year

PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	692,500
70600	HUD PHA Operating Grants	6,064,000
70610	Capital Grants	355,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0
71100+72000	Interest Income	500
71600	Gain or Loss on Sale of Capital Assets	16,950,000
71200+71300+71310+71400+71500	Other Income	41,000.00
70000	Total Revenue	24,103,000

Estimated Uses of MTW Funding for the Fiscal Year

PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	298,000

91300+91310+92000	Management Fee Expense	552,000
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	46,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	166,000
93500+93700	Labor	0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	286,000
95000 (95100+95200+95300+95500)	Total Protective Services	14,000
96100 (96110+96120+96130+96140)	Total insurance Premiums	40,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	79,000
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	41,000
97100+97200	Total Extraordinary Maintenance	0
97300+97350	Housing Assistance Payments + HAP Portability-In	5,439,500
97400	Depreciation Expense	273,000
97500+97600+97700+97800	All Other Expenses	14,000
90000	Total Expenses	7,248,500

Describe the Activities that Will Use Only MTW Single Fund Flexibility

In addition to funding HCVP for the full year and Public Housing through June 30, assuming a sale under RAD, MTW funds will be used to close any gap in the RAD/Section 18 disposition transaction. Additional MTW funds will be used for the required rent control study and to acquire new affordable units in accordance with Activity #2015-1.

V.2.Plan.Local Asset Management Plan

B. MTW Plan: Local Asset Management Plan

Is the PHA allocating costs within statute?

Yes No
 s r

Is the PHA implementing a local asset management plan (LAMP)?

<input type="checkbox"/>	o	<input checked="" type="checkbox"/>
<input type="checkbox"/>	r	<input checked="" type="checkbox"/>

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix?

<input type="checkbox"/>	o	<input checked="" type="checkbox"/>
<input type="checkbox"/>	r	<input checked="" type="checkbox"/>

PHAs should provide a brief summary of any changes in the Local Asset Management Plan in the body of the Plan.

Assumptions for Sources of funds in 2015

BHP is estimating a close on disposition of all but 14 Public Housing units under either Section 18 or RAD as of June 30, 2015. Therefore certain items have been adjusted accordingly.

- Total Tenant Revenue equal to ½ of 2014.
- HUD PHA Operating Grants (BHP is assuming full year PH funding for Operating Subsidy and Capital Fund).
- HCVP HAP, Admin and PH Op Subsidy equal to expected 2014 funding.
- Capital Grants – 2015 increment equal to 2014 funding used for funding PH conversion project.
- Gain or Loss on Sale of Capital Assets is rough estimate of the appraised price of the property less the remaining book value. This will be a Note Receivable and not cash received at sale.
- Other Income – Estimate of Solar rebates, QECB interest rebate from IRS, insurance dividend etc.
- Expenses for Public Housing are reduced by ½ from 2014. HAP expense is increased by ½ of estimated operating subsidy and ½ of capital fund to recognize PH conversion transaction starting July 1.
- Cash receipts equal cash expenses assuming ½ of CFP is spent on conversion transaction.

Section VI: Administrative

Board Resolution Submittal

RESOLUTION #9 SERIES OF 2014

ANNUAL MOVING TO WORK PLAN CERTIFICATIONS OF COMPLIANCE U.S. Department of Housing and Urban Development Office of Public and Indian Housing

Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan*

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning 2015, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The 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.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a 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 to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.

7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. 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.
10. 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.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The 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 and implementing regulations at 49 CFR Part 24.
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 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 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 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 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).

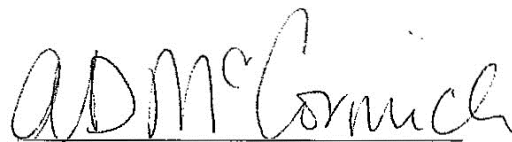
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

21. All attachments to the Plan have been and will continue to be available at all times and all locations that the 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 Plan and will continue to be made available at least at the primary business office of the PHA.

Boulder Housing Partners CO016
PHA Name PHA Number/HA Code

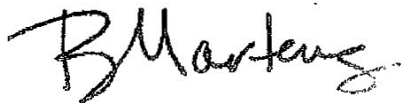
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Adopted this 13th day of October, 2014.
(SEAL)



Angela McCormick
Chair, Board of Commissioners
Housing Authority of the City of Boulder

ATTEST:



BETSEY MARTENS
Executive Secretary

*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

Public Review

This 2015 MTW Annual Plan was made public for review from September 9, 2013 through October 13, 2014. The Plan was posted to our website. The Plan was discussed at the Moving to Work Resident Advisory Committee meetings on September 3 and 4, 2014. One public hearing was held on September 23, 2014 at the main office of Boulder Housing Partners. No public housing residents and Section 8 participants attended.

Agency-Directed Evaluation of the Demonstration

BHP is working in partnership with the University of Colorado (CU) to develop the rent controlled study to evaluate the effects of the rent reform structures that were put into place in 2014. Due to Public Conversion, the rent reform structure for public housing work-abled families was not implemented. However, questionnaires were sent to all work-abled families in both the Public Housing and Section 8 Housing Choice Voucher Program to gather baseline data. Results from the baseline data will be shared in the 2014 MTW Annual Report.

The proposed approach to the study, as authored by the research team at CU, is as follows:

1. Purpose of the Study

As part of its MTW Agreement, BHP proposes two interventions: designing and adopting a new rent model, and promoting resident services. With these interventions, BHP aims to meet MTW program objectives by:

- Increasing the proportion of working households
- Increasing average income from employment
- Decreasing the number of staff hours in recertification process related to income changes
- Decreasing the number of paybacks due to unreported increases in income

By initiating an experimental study in Boulder, Colorado, the effects of the proposed interventions on Public Housing and Section 8 Voucher program households' economic self-sufficiency will be evaluated.

2. Research Questions

Four main questions will be asked:

- 1) To what extent did the new rent model increase the proportion of working households?
- 2) To what extent did the new rent model and access to resident services increase the proportion of working households?
- 3) To what extent did the new rent model increase households' average income from employment?
- 4) To what extent did the new rent model and resident services increase households' average income from employment?

Boulder Housing Partners is expecting that the new rent model will yield an increase of 2% in number of working families and an increase of 2% in average earned income.

In addition to earned income, dependence on public subsidies and private actors will be assessed to measure the change in Moving-to-Work participants' economic self-sufficiency. Other household outcomes, such as rent burden, childcare expenses and placement issues, mobility (private and public transportation), level of education and school performance, access to resources, access to food, health status, participation in community and social support networks, and personal and job skills may also be evaluated.

3. Research Design

To assess household impacts of its two proposed MTW interventions (rent reform for the Section 8 and Public Housing work-abled families), BHP will examine how and to what extent a new rent model will affect Section 8 MTW household outcomes. In addition, it will assess possible impacts of the selective, site-specific introduction of improvement in resident services for public housing residents.

In the research design, the new rent model and the improvement in resident services function as independent variables. The dependent variables (household outcomes) include:

- earned income from employment
- employment status
- rent burden
- childcare expenses and placement issues
- mobility (private and public transportation)
- level of education / school performance
- access to resources (legal, financial, etc.)
- access to food
- health status
- participation in community and social support networks
- personal and job skills

The selection of the preferred method depends on several considerations, including the available population in a community, or sample size that can be drawn from a population. Statistical power analysis helps researchers understand how large a sample is needed to enable statistical judgments that are accurate and reliable. Estimating the required sample size before an experimental study is important because if sample size is too low, the experiment will lack the precision to provide reliable answers to the questions it is investigating. If sample size is too large, time and resources will be wasted, often for minimal gain. Statistical power analysis helps researchers to estimate the required sample size.

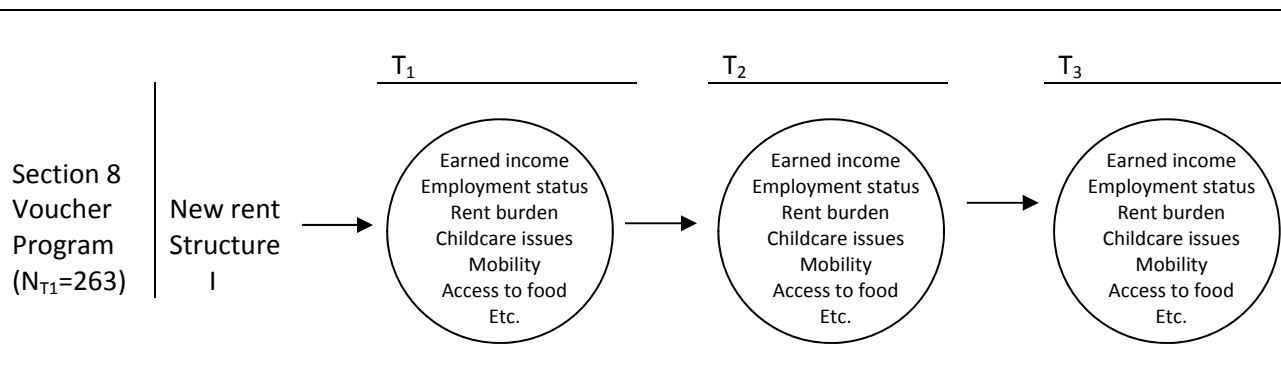
Ideally, the research design would include a treatment group and a control group, not exposed to any intervention with data collection at baseline and after implementation of the interventions (or some variation thereof that could include phased introduction of the interventions). Realistically, the size and composition of BHP's resident population make a different research design more appropriate. Splitting the total resident population of 398 households into treatment and control groups would produce numbers too small for meaningful statistical analysis. This size limitation is exacerbated by the certainty of a less than 100% initial

response rate.² Response rates will decline further in subsequent data collection, made more problematic due to annual attrition of about 10% resulting from resident turnover. Research has shown that BHP would need a minimum of 800 households to participate in a control study to have the ability to produce meaningful data; BHP has a total population of 398 households eligible for the study.

As to composition, BHP’s resident population includes two distinct groups: households in public housing (N=135) and households with housing choice vouchers (N=263). The former live in spatial clusters and include significantly more Latino households, creating two distinctly different subpopulations. If households from across both subpopulations would be randomly assigned to treatment and control groups, the analysis would need to partial out confounding influences, associated with subpopulation characteristics and not arising from the intervention. Doing so would require statistical techniques that assume a larger number of households. Alternatively, each of the two subpopulations of an already small total resident population each could be split into a treatment and a control group. However, also this scenario would produce numbers too small for meaningful analysis.

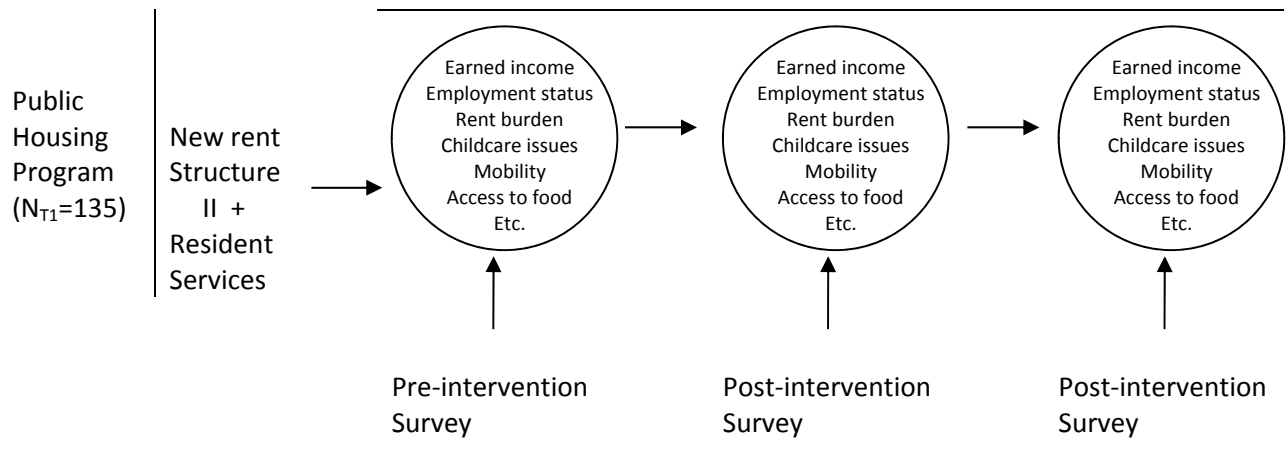
Therefore, the logical research design involves a within-subjects experiment. This approach examines an assumed relationship between, for example, rent burden and earned household income, by manipulating an independent variable (e.g., rent paid), and comparing dependent variable values (e.g., job earnings), resulting from independent variable changes, with known baseline conditions. Control groups as in between-subjects experiments are not needed because each household at Time 1 is compared with itself at Time 2 and Time 3 (see Figure 4).

Figure 4: Visualization of within-subjects research design



² Even with personal follow-up visits, past studies have reported significant non-response rates. Typical examples of the proportion of public housing residents participating in survey research are:

- 2% (Hynes et al. 2000)
- 53% (Bennett et al. 2007)
- 56% (phone survey; Digenis-Bury et al. 2008)
- 62% and 79% (personal interviews with return visits; Cora et al. 2007)
- 65% (mail survey with follow up phone calls), 58% (Goetz 2010).
- 85% (personal interviews; Kleit 2003)
- 91% (survey with follow up visits to qualify for MTO; Ludwig et al. 2001)



From an ethical perspective, another advantage of the within-subjects design is that it avoids the thorny issue of having to withhold from (control group) households an intervention that is expected to benefit residents.

BHP plans to target Section 8 households for rent reform. Public housing households will also experience some rent reform, as well as improved resident services in select projects, enabling an exploration of impacts through comparison over time and with projects that will not see a change in resident services³.

4. Data Collection and Analysis

A mixed-method approach, using quantitative and qualitative methods, will be used to collect and analyze primary data from MTW participants and BHP staff:

Data sources	Data collection Instruments
MTW households	<ul style="list-style-type: none"> * Questionnaires * Focus groups * Interviews
MTW program staff	<ul style="list-style-type: none"> * Interviews * Secondary (archival) data

Questionnaires for Measuring MTW Households' Economic Self-Sufficiency

A baseline questionnaire survey was administered to all sample members (MTW households) immediately before adopting the new rent model and starting the resident services. The same

³ The number of households in these comparisons will be too small for statistical analysis, but qualitative data can nonetheless provide valuable insights to guide further program development

questionnaire will be administered to MTW households at the end of year 2 to measure the effect of the proposed interventions on their economic self-sufficiency. Questionnaire surveys have been the most common technique for assessing individual's self-sufficiency (see, for example, Abt Associates Inc. et al., 2006; Gowdy and Pearlmutter, 1993; Pinsoneault, 2006; Ramey, 2010; Women's Foundation of Genesee Valley, 2004). This method was chosen particularly due to its potential for the researchers to help them compare pre- and post-cases in a reliable manner.

Annual Statement/Performance and Evaluation Report (HUD 50075.1)

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		
PHA Name: Boulder Housing Partners \$367,806	Grant Type and Number Capital Fund Program Grant No: CO06P01650115 Replacement Housing Factor Grant No: CO06R01650115 Date of CFFP:	FFY of Grant: 2015 FFY of Grant Approval: 2015

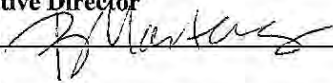
Type of Grant
 Original Annual Statement Reserve for Disasters/Emergencies
 Performance and Evaluation Report for Period Ending: Revised Annual Statement (revision no:)
 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	\$36,780		0	0
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	\$331,026		0	0
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary						
PHA Name: Boulder Housing Partners		Grant Type and Number Capital Fund Program Grant No: CO06P01650114 Replacement Housing Factor Grant No: CO06R01650114 Date of CFFP: No			FFY of Grant: 2015 FFY of Grant Approval: 2015	
Type of Grant						
<input checked="" type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no:)		
<input type="checkbox"/> Performance and Evaluation Report for Period Ending:			<input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹		
		Original	Revised ²	Obligated	Expended	
18a	1501 Collateralization or Debt Service paid by the PHA					
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment					
19	1502 Contingency (may not exceed 8% of line 20)					
20	Amount of Annual Grant:: (sum of lines 2 - 19)					
21	Amount of line 20 Related to LBP Activities					
22	Amount of line 20 Related to Section 504 Activities					
23	Amount of line 20 Related to Security - Soft Costs					
24	Amount of line 20 Related to Security - Hard Costs					
25	Amount of line 20 Related to Energy Conservation Measures					
Signature of Executive Director 		Date 30th 2014		Signature of Public Housing Director		
				Date		

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

Part II: Supporting Pages								
PHA Name: Boulder Housing Partners		Grant Type and Number Capital Fund Program Grant No: CO06P01650112 CFFP (Yes/ No): No Replacement Housing Factor Grant No: CO06R01650112			Federal FFY of Grant: 2013			
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
All public housing properties--Kalmia, Manhattan, Madison, Diagonal Court, Iris Hawthorn, Arapahoe Court, Walnut Place, Northport	Move to Work Demonstration--to support pre-development and renovation costs for RAD and Section 18 conversions of public housing assets	1492		\$331,026		0	0	

APPENDIX A: Ten Year Plan for RHF Funds

Replacement Housing Factor (RHF) Funds Plan: 1175 Lee Hill

BHP received authorization for 10 years of Replacement Housing Factor (RHF) funds. 2014 was year seven so we expect to receive an additional three years of RHF funding through 2017. BHP committed all of these funds to the construction of 1175 Lee Hill, an apartment building with 31 units of permanent supportive housing. In anticipation of this RHF funding continuing for the full ten years, BHP loaned from its non-federal reserves a total of \$600,000 towards the project with the expectation that this loan would be repaid from the full 10-year increment of RHF funds. BHP has been repaid \$437,224 through 2014. We expect the remaining three years to be enough to fully repay BHP such that all of the RHF funds will have been used in the construction of 1175 Lee Hill.

Project History

BHP, in partnership with the Shelter, has long sought the opportunity to expand the number of permanent supportive housing units in the city of Boulder. BHP began its permanent supportive housing program in 2000 with an enormously successful partnership with the Mental Health Center providing ten homes for chronically homeless households at the Holiday Neighborhood in north Boulder. In 2006, BHP partnered with the Shelter to create the Boulder County Housing First program. It, too, has produced noteworthy results.

Project Description

Each of the 31 units is available to households who meet the definition of chronically homeless. All of the units have been developed as permanently affordable rental housing pursuant to the deed restrictions and covenants that the City of Boulder will record against the property. This project serves households most in need of affordable housing and is a project-based extension of the Housing First program already in place. The Shelter takes referrals for leasing these units from a number of sister agencies in Boulder County. The Shelter provides case management for these clients (with several bi-lingual case managers) as long as they stay in housing. BHP is landlord and property manager.

Project Development Schedule

2009	Summer:	Negotiations to acquire property
2010	May:	BCATH Worthy Cause Tax Funds awarded (\$832,150)
	June:	Property acquisition finalized
	July:	City of Boulder 2010 grant awarded (\$121,000)
	August:	Initiate predevelopment activities/community outreach process
	October:	Begin zoning approval process
2011		Predevelopment, planning and community outreach
2012	July:	Low Income Housing Tax Credit (LIHTC) application due City of Boulder 2011 grant awarded
	September:	Begin LIHTC partnership due diligence and GC procurement
	December:	Zoning approval awarded
2013	September:	Begin construction
2014	September/October:	Complete construction, begin lease up

APPENDIX B: RAD Significant Amendment

In 2012, consistent with the intent of Boulder Housing Partner's Moving to Work Application and Activity 2012-1, Boulder Housing Partners (BHP) applied under the Rental Assistance Demonstration (RAD) Program of the U.S. Department of Housing and Urban Development (HUD) to convert 172 units of public housing to project-based vouchers. While BHP in the 2012 MTW Annual Plan stated its intention to accomplish conversion through HUD's approval of the disposition of all public housing units and replace with tenant protection vouchers, the approval for disposition only included two communities (Kalmia and Walnut Place). BHP's 2014 MTW Annual Plan stated its intention to convert the remaining public housing units (with the exception of Arapahoe Court) that were not approved through disposition under RAD (including Diagonal Court, Iris Hawthorn, Madison, Manhattan and Northport). BHP's application to RAD is available in hard copies at its central office (4800 N. Broadway, Boulder, CO 80304). BHP will continue to own and operate 14 units of public housing at the Arapahoe Court site.

BHP will be converting to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to Project Based Vouchers, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6.c and 1.6.D of PIH Notice 2012-32, REV-1. These resident rights, participation, waiting list and grievance procedures are included in this Appendix. Additionally, BHP is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing BHP with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, BHP's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that BHP may also borrow funds to address their capital needs. BHP will also apply for low-income tax credits and other local funds, which combined with BHP funds, will address the capital needs. The total amount needed to address the capital needs is being informed by our Physical Conditions Assessment which has just begun and our ability to bring financial resources to the deal. We expect to invest between \$8,000,000 and \$12,000,000 in construction hard cost in our public housing sites that are converting to RAD. BHP will also be contributing Operating Reserves and Capital Funds in the amount of \$100,000 on pre-development costs towards the conversion. BHP currently has debt under an Energy Performance Contract and will be working with Bank of America to address outstanding debt issues, which may result in additional reductions of capital or operating funds. Regardless of any funding changes that may occur as a result of conversion under RAD, Boulder Housing Partners certifies that it will maintain its continued service level at the initial baseline number of households for public housing as when it entered the MTW Demonstration Program, which is 337 units of public housing. After RAD conversion, this will be 14 units of public housing, 150 Tenant Protection Vouchers, and 172 RAD PBV units.

The required information for this significant amendment is as follows:

Description of the Public Housing Development(s) selected for RAD: BHP intends to convert the following five public housing properties to the RAD program.

Development #1: Diagonal Court Apartments

Name of PH Development: Diagonal Court	PIC Development ID: CO016333333	Conversion Type: PBV	Transfer of Assistance: NO
Total Units: 30	Pre-RAD Unit Type (i.e. Family Senior etc.) Family	Post-RAD Unit Type if different: Same	Capital Fund allocation of Development: \$33,235
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (de minimis reduction, transfer of assistance, unit reconfigurations, etc.)
Studio/Efficiency	0	0	N/A
One Bedroom	0	0	N/A
Two Bedroom	25	25	N/A
Three Bedroom	5	5	N/A
Four Bedroom	0	0	N/A

Development #2: Iris Hawthorne Apartments

Name of PH Development: Iris Hawthorne	PIC Development ID: CO016333333	Conversion Type: PBV	Transfer of Assistance: NO
Total Units: 14	Pre-RAD Unit Type (i.e. Family Senior etc.) Family	Post-RAD Unit Type if different: Same	Capital Fund allocation of Development: \$15,510
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (de minimis reduction, transfer of assistance, unit reconfigurations, etc.)
Studio/Efficiency	0	0	N/A
One Bedroom	0	0	N/A
Two Bedroom	0	0	N/A
Three Bedroom	7	7	N/A
Four Bedroom	7	7	N/A

Development #3: Madison Apartments

Name of PH Development: Madison	PIC Development ID: CO016333333	Conversion Type: PBV	Transfer of Assistance: NO
Total Units: 34 33 occupied 1 non-dwelling	Pre-RAD Unit Type (i.e. Family Senior etc.) Family and Elderly/Disabled	Post-RAD Unit Type if different: 34 Total 32 occupied 2 non-dwelling	Capital Fund allocation of Development: \$37,667
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (de minimis reduction, transfer of assistance, unit reconfigurations, etc.)
Studio/Efficiency	0	0	N/A
One Bedroom	12 11 occupied 1 non-dwelling	10 10 occupied 2 non-dwelling	1 unit de minimis. For delivery of resident services.
Two Bedroom	14	14	N/A
Three Bedroom	8	8	N/A
Four Bedroom	0	0	N/A

Development #4: Manhattan Apartments

Name of PH Development: Manhattan	PIC Development ID: CO016333333	Conversion Type: PBV	Transfer of Assistance: NO
Total Units: 44 43 occupied 1 non-dwelling	Pre-RAD Unit Type (i.e. Family Senior etc.) Family and Elderly/Disabled	Post-RAD Unit Type if different: 44 Total 42 occupied 2 non-dwelling	Capital Fund allocation of Development: \$37,667
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (de minimis reduction, transfer of assistance, unit reconfigurations, etc.)
Studio/Efficiency	0	0	N/A
One Bedroom	18 17 occupied 1 non-dwelling	18 16 occupied 2 non-dwelling	1 unit de minimis. For delivery of resident services.
Two Bedroom	18	14	N/A

Three Bedroom	8	8	N/A
Four Bedroom	0	0	N/A

Development #5: Northport Apartments

Name of PH Development:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Northport	CO01677777	PBV	NO
Total Units:	Pre-RAD Unit Type (i.e. Family Senior etc.)	Post-RAD Unit Type if different:	Capital Fund allocation of Development:
50	Elderly/Disabled	Same	\$55,392
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (de minimis reduction, transfer of assistance, unit reconfigurations, etc.)
Studio/Efficiency	20	20	N/A
One Bedroom	30	30	N/A
Two Bedroom	0	0	N/A
Three Bedroom	0	0	N/A
Four Bedroom	0	0	N/A

Total to Convert under RAD: 172 Physical Units/168 Occupied Units

Any change in the number of units that is proposed as part of the conversion, including:

- a. De Minimis unit reductions: Two units for Community Centers. One unit at the Madison Apartments and one at the Manhattan Apartments.
- b. Unit reductions that are exempt from the de minimis cap: None planned.
- c. Any change in the bedroom distribution of units that is proposed as part of the conversion. None planned.

Changes in the policies that govern eligibility, admission, selection, and occupancy of units at the project sites after they have been converted, including any waiting list preferences that will be adopted for the converted project: There will be no changes upon conversion.

Information regarding transfer of assistance: BHP does not propose transfer of assistance to any other units or sites.

Compliance agreements: BHP is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

Required information for submitting amendment: Please see Section VI and Appendix C of this Annual Plan.

Information regarding use of MTW Fungibility as defined in the New RAD Notice: This will not apply.

Impact on Capital Fund: BHP has drawn all of our Capital Fund grants through 2014 for use in our MTW activities. The MTW funds will be utilized for pre-development cost as allowable for the RAD and Section 18 Disposition of Public Housing. We anticipate using \$100,000 of our MTW Funds for pre-development activities and the balance including any prorated amount available from 2015 allocation for the renovation construction associated with the RAD and Section 18 disposition.

- a. **Estimate of the amount of the current Capital Fund grant that is associated with the proposed projects and the impact on the PHA's current Five-Year PHA Plan and Five-Year Capital Fund Action Plan:** BHP's Five Year PHA and Capital Plans will be updated post RAD Conversion to reflect the work that has been completed and any outstanding required renovation. We anticipate that the scope of work will be entirely comprehensive and therefore all deferred maintenance items addressed as well as making the properties "like-new". The converted properties will carry reserve accounts as well. All but one of BHP's Public Housing properties will convert out of the public housing program; Arapahoe Court will remain in AMP 1. Capital Fund Grants will decrease significantly based on the unit count. We will create an amended Capital Fund Plan and Annual Plan for Arapahoe Court post conversion.
- b. **If the RAD conversion will impact an existing CFFP or utilize RHF funds to facilitate conversion, the PHA should also indicate the estimate impact of those activities.** This does not apply as there are no RHF funds in this plan and BHP does not have a CFFP.

Significant Amendment Definition

If your PHA is changing its definition for substantial deviation to the PHA Plan, below find a suggested version:

As part of the Rental Assistance Demonstration (RAD), BHP is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;

Changes to the construction and rehabilitation plan for each approved RAD conversion; and

Changes to the financing structure for each approved RAD conversion.

Relocation Plans

Boulder Housing Partners intends to convert five Public Housing sites through the RAD program. The five sites that will convert under RAD are Diagonal Court, Iris Hawthorne, Madison, Manhattan and the Northport Apartments. As stated on the Relocation Checklist (see Appendix C), the renovation work planned once we have converted to RAD will not change the accessibility at the site, nor will any residents be temporarily relocated for more than 60 days.

The Significant Amendment requires that BHP submit the Relocation Checklist and the Financing Plan for RAD, or our Relocation Plan. Given that we are still determining Scope of Work for the project and do not plan to submit the Financing Plan to the RAD office of HUD until March 2015, the Financing Plan is not available for review with the Significant Amendment. BHP is presently drafting the Relocation Plan with input from our stakeholders and our Relocation Consultant, HC Peck and Associates. The Relocation Plan is being prepared per the HUD recommendations

contained in Appendix 1 of HUD's recent Notice entitled "Relocation Requirements under the Rental Assistance Demonstration (RAD) Program, Public Housing in the First Component" and will be available for review by HUD no later than December 1, 2014.

The Relocation Plan will document BHP's relocation planning process and establish the procedures by which we will assist each family at the sites converting with RAD. At a minimum, BHP will provide all relocation housing, pay all out of pocket moving expenses for RAD, and adhere to all other requirements as outlined in the Final RAD Relocation Notice dated July 14, 2014.

Resident Rights, Participation, Waiting List and Grievance Procedures

Section 1.6 Special Provisions Affecting Conversions to Project Based Vouchers from PIH Notice 2012-32, REV-1.

C. PBV Resident Rights and Participation

1. No Re-screening of Tenants upon Conversion. Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.

2. Right to Return. Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.

3. Renewal of Lease. Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.

4. Phase-in of Tenant Rent Increases. If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA

may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section “standard TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP

Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP
- Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward.

5. Public Housing Family Self Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs. Current PH FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any PH FSS funds granted previously or pursuant to the FY 2013 PH FSS NOFA, to serve those FSS participants who live in units converted by RAD and who will as a result be moving to the HCV FSS program, subject to the following:

- a. If a PHA has an HCV FSS program, a PHA must convert the PH FSS program participants at the covered project to their HCV FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.
- b. If a PHA does not have an HCV FSS program, the PHA must establish an HCV FSS program and convert the PH FSS program participants at the covered project into their HCV FSS program. PHAs are not required to offer enrollment in FSS to residents in converting projects and other HCV participants, other than to residents in converting projects that were enrolled in the PH FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984 and in accordance with the participants' contracts of participation. However, residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant's failure to comply with the contract of participation. Consequently, 24 CFR 984.303(b)(5)(iii) does not apply to FSS participants in converted properties.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future public housing ROSS-SC grants, nor will its residents be eligible to be served by future public housing ROSS-SC grants.

6. Resident Participation and Funding. In accordance with Attachment 1B, residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

7. Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

- a. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, as modified by the waiver in Section 1.6(C)(3) above, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:
 - i. A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction;
 - ii. 14 days in the case of nonpayment of rent; and

- iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
- a. **Grievance Process.** HUD is incorporating additional procedural rights to comply with the requirements of section 6 of the Act.

For issues related to tenancy and termination of assistance, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi),³¹ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a PHA (as owner) action in accordance with the individual’s lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident’s rights, obligations, welfare, or status.
 - For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program.
 - For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.
- ii. An informal hearing will not be required for class grievances or to disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement shall not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.
- iii. The PHA (as owner) give residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- iv. The PHA (as owner) provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA’s Section 8 Administrative Plan.

8. Earned Income Disregard (EID). Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only applies to tenants

receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc.) is covered by this waiver.

9. Capital Fund Education and Training Community Facilities (CFCF) Program. CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as “PHA residents” for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents.

D. PBV: Other Miscellaneous Provisions

1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration. PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.

2. Additional Monitoring Requirement. The PHA’s Board must approve the operating budget for the covered project annually in accordance with HUD requirements.

3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). Under existing PBV program rules, projects that qualify as “existing housing” under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as “existing housing.” Developmental requirements under 24 CFR § 983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.

4. Establishment of Waiting List. In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list in accordance 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA’s public housing

community-wide waiting list have been offered placement on the converted project's initial waiting list. For the purpose of establishing the initial waiting list, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing waiting list given the number of applicants, PHA resources, and community characteristics of the proposed conversion under RAD. Such activities should be pursuant to the PHA's policies for waiting list management, including the obligation to affirmatively further fair housing.

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency's centralized public housing waiting list who wish to be placed onto the newly-established waiting list are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP).

To implement this provision, HUD is waiving 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

5. Mandatory Insurance Coverage. The project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project, except with the written approval of HUD to the contrary.

6. Agreement Waiver. For public housing conversions to PBV, there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.

7. Future Refinancing. Owners must receive HUD approval for any refinancing or restructuring of permanent debt within the HAP contract term to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

8. Administrative Fees for Public Housing Conversions. For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full public housing funding

for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time.

Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the ACC will be amended to include section 8 funding that corresponds to the units covered by the ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

Resident Provisions in Conversions of Assistance from Public Housing to PBRA and PBV

This Attachment contains two sections, describing:

1B.1 Summary of Resident Provisions

1B.2 Resident Participation and Funding

1B.1 Summary of Resident Provisions

The following is a summary of special provisions and alternative requirements related to tenants of public housing projects converting under RAD:

- Conversion will be considered a significant amendment to a PHA Plan (see Section 1.5(E) of this Notice);
- Notification of proposed conversion, meetings during the conversion process, written response to residents comments on conversion, and notification of conversion approval and impact (see Section 1.8 of this Notice);
- No rescreening at conversion (see Section 1.6(C)(1) of this Notice for conversions to PBV and Section 1.7(B)(1) for conversions to PBRA);
- Right to return after temporary relocation to facilitate rehabilitation or construction (see Section 1.6(C)(2) of this Notice for conversions to PBV and Section 1.7(B)(2) for conversions to PBRA);
- Renewal of lease at expiration in the PBV program, unless good cause exists (see Section 1.6(C)(3) of this Notice);
- Phase-in of tenant rent increases (see Section 1.6(C)(4) of this Notice for conversions to PBV and Section 1.7(B)(3) for conversions to PBRA);

- Continued participation in the ROSS-SC and FSS programs (see Section 1.6(C)(5) of this Notice, for conversions to PBV and Section 1.7(B)(4) for conversions to PBRA);
- Continued Earned Income Disregard (see Section 1.6(C)(8) of this Notice, for conversions to PBV and Section 1.7.(B)(7) for conversions to PBRA);
- Continued recognition of and funding for legitimate residents organizations (see Section 1.6(C)(6) of this Notice for conversions to PBV, Section 1.7(B)(5) of this Notice for conversions to PBRA, and below in Attachment 1B.2 for additional requirements for both programs);
- Procedural rights consistent with section 6 of the Act (see Section 1.6(C)(7) of this Notice for conversions to PBV and Section 1.7(B)(6) of this Notice for conversions to PBRA); and
- Choice-mobility option allowing a resident to move with a tenant-based voucher after tenancy in the covered project (see 24 CFR § 983.260 for conversions to PBV and

Section 1.7(C)(5) of this Notice for conversions to PBRA).

1B.2 Resident Participation and Funding⁷⁶

The following provisions contain the resident participation and funding requirements for public housing conversions to PBRA and PBV, respectively.

A. PBRA: Resident Participation and Funding (not applicable--omitted)

B. PBV: Resident Participation and Funding

To support resident participation following conversion of assistance, residents of covered projects converting assistance to the PBV program will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment, which includes the terms and conditions of their tenancy as well as activities related to housing and community development.

1. Legitimate Resident Organization. A PHA must recognize legitimate resident organizations and give reasonable consideration to concerns raised by legitimate resident organizations. A resident organization is legitimate if it has been established by the residents of a covered project, meets regularly, operates democratically, is representative of all residents in the development, and is completely independent of PHAs, management, and their representatives.

In the absence of a legitimate resident organization at a covered project, HUD encourages the PHA and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate residents organization. Residents are encouraged to contact the PHA directly with questions or concerns regarding issues related to their tenancy. PHAs are also encouraged to actively engage residents in the absence of a resident organization; and

2. Protected Activities. PHAs must allow residents and resident organizers to conduct the following activities related to the establishment or operation of a resident organization:

- a. Distributing leaflets in lobby areas;
- b. Placing leaflets at or under residents' doors;
- c. Distributing leaflets in common areas;
- d. Initiating contact with residents;
- e. Conducting door-to-door surveys of residents to ascertain interest in establishing a resident organization and to offer information about resident organizations;
- f. Posting information on bulletin boards;
- g. Assisting resident to participate in resident organization activities;
- h. Convening regularly scheduled resident organization meetings in a space on site and accessible to residents, in a manner that is fully independent of management representatives. In order to preserve the independence of resident organizations, management representatives may not attend such meetings unless invited by the resident organization to specific meetings to discuss a specific issue or issues; and
- i. Formulating responses to PHA's requests for:
 - i. Rent increases;
 - ii. Partial payment of claims;
 - iii. The conversion from project-based paid utilities to resident-paid utilities;
 - iv. A reduction in resident utility allowances;
 - v. Converting residential units to non-residential use, cooperative housing, or condominiums;
 - vi. Major capital additions; and
 - vii. Prepayment of loans.

In addition to these activities, PHAs must allow residents and resident organizers to conduct other reasonable activities related to the establishment or operation of a resident organization. PHAs shall not require residents and resident organizers to obtain prior permission before engaging in the activities permitted in this section.

3. Meeting Space. PHAs must reasonably make available the use of any community room or other available space appropriate for meetings that is part of the multifamily housing project

- a. Residents or a resident organization and used for activities related to the operation of the resident organization; or
- b. Residents seeking to establish a resident organization or collectively address issues related to their living environment.

Resident and resident organization meetings must be accessible to persons with disabilities, unless this is impractical for reasons beyond the organization's control. If the development has an accessible common area or areas, it will not be impractical to make organizational meetings accessible to persons with disabilities.

PHAs may charge a reasonable, customary and usual fee, approved by the Secretary as may normally be imposed for the use of such facilities in accordance with procedures prescribed by the Secretary, for the use of meeting space. A PHA may waive this fee.

4. Resident Organizers. A resident organizer is a resident or non-resident who assists residents in establishing and operating a resident organization, and who is not an employee or representative of current or prospective PHAs, managers, or their agents.

PHAs must allow resident organizers to assist residents in establishing and operating resident

5. Canvassing. If a covered project has a consistently enforced, written policy against canvassing, then a non-resident resident organizer must be accompanied by a resident while on the property of the project.

If a project has a written policy favoring canvassing, any non-resident resident organizer must be afforded the same privileges and rights of access as other uninvited outside parties in the normal course of operations. If the project does not have a consistently enforced, written policy against canvassing, the project shall be treated as if it has a policy favoring canvassing.

A resident has the right not to be re-canvassed against his or her wishes regarding participation in a resident organization.

6. Funding. PHAs must provide \$25 per occupied unit annually for resident participation, of which at least \$15 per occupied unit shall be provided to the legitimate resident organization at the covered property. These funds must be used for resident education, organizing around tenancy issues, and training activities.

In the absence of a legitimate resident organization at a covered project:

- a. HUD encourages the PHAs and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate residents organization. Residents are encouraged to contact the PHA directly with questions or concerns regarding issues related to their tenancy. PHAs are also encouraged to actively engage residents in the absence of a resident organization; and
- b. PHAs must make resident participation funds available to residents for organizing activities in accordance with this Notice. Residents must make requests for these funds in writing to the PHA. These requests will be subject to approval by the PHA.

APPENDIX C: Other HUD Required Documents

RAD FHEO Accessibility and Relocation Plan Checklist

The following checklist is required to be submitted to the RAD Transaction Manager prior to, or concurrent with, submission of the Financing Plan.

PHA Name: **Boulder Housing Partners** PHA Code: **CO016**

PIC Project Number: **CO016777777**

Total Number of Units: 50 (Northport)

PIC Project Number: **CO016333333**

**Total Number of Units: 122 (Diagonal Court/30;
Iris Hawthorne/14; Madison/34; Manhattan/44)**

Proposed Number of Units to be Converted: **172, 168 Dwelling Units, 4 Non-Dwelling Units**

PHA Contact Person: **Laura Sheinbaum** Email: **SheinbaumL@boulderhousing.org** Phone: **720.564.4646**

Date Completed: **9-30-2014**

Section I: Threshold Questions

Please check the appropriate box for the following threshold questions:

Question	Yes	No
Will the conversion of assistance impact current accessibility?		XX
Will the conversion of assistance result in off-site temporary relocation for any resident that will last for more than 60 days or include the transfer of assistance to another site?		XX

If you answered no to both of the above questions, please skip the remaining sections of this checklist and sign the bottom of the form. In all other cases, please complete the relevant section of the checklist. For example, if you answered yes to the first question, please complete Section II, Accessibility.

Section II: Accessibility

- Please describe how the conversion of assistance will impact accessibility. Additionally, please indicate the number of units to be converted and the units that will be accessible.

RAD FHEO Accessibility and Relocation Plan Checklist

- b. Please provide the following waiting list and occupancy data for accessible units. If the units are currently vacant, please provide the data for the most recent occupants of the project.

Bedroom Size	0	1	2	3	4	5	Other	Total
1. Number of persons on waiting list who have requested mobility accessible units								
2. Number of persons on waiting list who have requested vision and/or hearing accessible units								
3. Number of mobility accessible units occupied by tenants with disabilities who require the features of the unit								
4. Number of hearing/vision accessible units occupied by tenants with disabilities who require the features of the unit								

- c. Please provide the distribution of all wheelchair and other accessible units that will be available in the project after RAD conversion.

Bedroom Size	0	1	2	3	4	5	Other	Total
1. All units								
2. Total units with project-based rental assistance								
3. Mobility accessible units								
4. Vision and/or Hearing accessible units								
*5. (Total Accessible Units)								

Section III: Relocation Plan

- a. Please explain any plans for the relocation of current residents, including the number of residents that will need to relocate, whether the relocation is temporary or permanent and, if temporary, the expected duration of the relocation, the type and location (including census tract) of the replacement housing, how the housing qualifies as a comparable unit as defined by the URA and 49 CFR 24.2(a)(6), and the method of determining which families will be subject to such long-term temporary relocation.

RAD FHEO Accessibility and Relocation Plan Checklist

- b. List the civil rights characteristics (race, national origin, familial status, and/or disability, etc.) of the residents to be transferred off-site for greater than 60 days or permanently relocated due to a transfer of assistance, as a result of the proposed conversion

White	African American	Asian	Hispanic	American Indian and Alaska Native	Native Hawaiian and Other Pacific Islander	Other (e.g., Families with Children; Disabled Individuals, etc.)

Please describe :

- c. The type of housing counseling or services provided to affected families.

- d. Describe the likely housing market areas/communities where tenants will relocate through HCV assistance or other HUD assistance programs, including whether they are relocated to an area of higher opportunity, areas (e.g., areas with better schools, employment, transportation opportunities), and the extent of improved housing choices and opportunities under the relocation plan.”

X R. Martens Name/Title Executive Director Date

The signature above indicates that (1) I am legally authorized to represent the agency in this matter, (2) all information provided in this checklist is true and accurate, (3) no resident shall be permanently and involuntarily relocated as a result of any conversion action associated with RAD, (4) the PHA will maintain compliance with Section 504 of the Rehabilitation Act of 1973, and HUD’s two (2%) and five (5%) percent accessibility requirements, (5) any relocation lasting under 60 days shall comply with all civil rights and fair housing requirements, including Section 504 of the Rehabilitation Act of 1973, (6) any relocation performed shall comply with Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) and its implementing regulations (49 CFR Part 24), and (7) if the proposed relocation was to be for less than 60 days and

RAD FHEO Accessibility and Relocation Plan Checklist

something changes requiring a period of temporary relocation longer than 60 days, I shall fill out this form again with the additional details.