

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The primary objective of the HOME Consortium is to maintain and increase housing opportunities in the Consortium area. The outcomes of each Consortium member vary slightly depending on market area needs. Specifically:

The City of Boulder's outcomes focus mostly on preserving and creating affordable housing. During the five-year term of the Consolidated Plan, Boulder anticipates it will provide funding to support the construction of rental units, preserve and construct new homeownership units, and collaborate with community partners to provide housing stabilization programs. The City of Boulder will also collaborate regionally to coordinate investment strategies for community investment program development to off-set existing conditions that threaten the health or welfare of the community, particularly for residents with low income and/or special needs, priority populations identified by social services providers. Regional collaboration will extend to promote economic development as well via programs focused on job development and support for small businesses. The City of Longmont focus will remain on homeownership preservation and construction, as well as new homebuyer opportunities via downpayment assistance and financial counseling. The City of Longmont will also focus on housing stabilization programs, community investments, and economic development via job creation and support for micro-enterprises and small businesses.

Broomfield City and County has successfully continued to use its HOME Funds to continue the Tenant Based Rental Assistance Program (TBRA) administered through the Health and Human Services Department.

The City of Boulder has successfully focused its use of federal funds to meet the housing needs of low and moderate income households, the capital improvement needs of service providers, and public services that target low- and moderate-income residents. The City plans to continue to focus federal resources on meeting these needs of the community. The City and its community partners believe the programs identified in the 2020 Action Plan and the five year goals continue to be the highest and best use of the HUD funds.

In 2020, due to the COVID-19 pandemic HUD provided the City of Boulder with additional funds to support the City's preparation, response to, and prevention of COVID-19. Through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) the City of Boulder was awarded \$1,079,301 in CDBG-CV funds. CDBG-CV funds are multi-year grants, that may be used after the 2020 program year. Additionally, HUD provided waivers and flexibilities to grantees that supported grantees in navigating the COVID-19 pandemic. Flexibilities were provided in a variety of categories including within each of the HUD funding programs, citizen participation requirements, environmental reviews, and home quality inspections.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration	Administration	CDBG: \$ / HOME: \$ / CDBG-CV1: \$186985	Other	Other	0	0				
Community Investment Programs	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	45	0	0.00%	25	0	0.00%
Community Investment Programs	Non-Housing Community Development	CDBG: \$	Other	Other	5	0	0.00%	1	0	0.00%
Economic Development Programs	Economic Development	CDBG: \$ / CDBG-CV1: \$85056	Businesses assisted	Businesses Assisted	50	19	38.00%	10	19	190.00%
Homeownership Programs	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	50	0	0.00%	19	19	100.00%

Homeownership Programs	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	25	0	0.00%	5	0	0.00%
Housing Stabilization Programs	Affordable Housing Homeless	CDBG: \$ / CDBG-CV1: \$400000	Other	Other	420	325	77.38%	400	0	0.00%
Rental Housing Programs	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	0	0		73	12	16.44%
Rental Housing Programs	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	250	0	0.00%			
Rental Housing Programs	Affordable Housing	CDBG: \$ / HOME: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	6		20	6	30.00%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City of Boulder has successfully focused its use of federal funds to meet the priorities and objectives in the Five -year Consolidated Plan. The City and its community partners believe the programs identified in the Action Plan and the five year goals continue to be the best use of the HUD funds.

Community Development:

- **Family Resource School** - The City of Boulder invested \$112,513 in CDBG funds to the Family Resource School Program (FRS). FRS is a

joint partnership between the City of Boulder and the Boulder Valley School District serving children and families at five elementary schools in Boulder: Columbine, Creekside, Crest View, University Hill and Whittier International. FRS is dedicated to supporting families capacity to raise healthy, well-functioning, and successful children through a broad array of prevention and early intervention services. These services are developed and delivered according to the unique needs of families in each school community. The program especially emphasizes outreach to traditionally underserved populations to increase access to basic services and engagement in school.

Housing & Rehabilitation:

- **Attention Homes – Chase Court** - The City of Boulder invested \$32,000 in CDBG funds in 2020 for the rehabilitation of Chase Court, a group home for homeless youth in the city of Boulder. Rehabilitation included ADA Compliance updates.
- **Safehouse Progressive Alliance for Nonviolence (SPAN)** - The City of Boulder invested \$186,066.60 in CDBG funding in 2020 for much needed capital improvements to the Safehouse, the City of Boulder's Domestic Violence Shelter.
- **Bridge House** - The City of Boulder invested \$109,000 in CDBG funds for capital Improvements to the Bridge House, Ready to Work Facility. Ready to Work provides adults experiencing homelessness a unique opportunity to rebuild their lives through work. The non-profit's holistic approach combines three elements - paid work in a Ready to Work social enterprise, dormitory housing at Ready to Work House, and case management support. Ready to Work is the first stepping stone to self-sufficiency. After one year, trainees graduate to mainstream jobs and permanent housing. Ready to Work has a success rate of 74%.

Housing Preservation:

- **Minor Home Repair Program** - A housing rehabilitation program, called Minor Home Repair Program is facilitated by the City of Longmont and serves the City of Boulder and the City of Longmont. The program is designed to help income qualified homeowners fix problems in their homes such as roofing, plumbing, heating, electrical, etc. Up to \$25,000 in assistance is provided in the form of a deferred or low-interest loan, and is prioritized to eliminate health and safety issues, correct code violations, make the home more energy-efficient, and undertake cosmetic improvements. The City of Boulder invested \$40,000 in CDBG funds toward this program.

Economic Development:

- **Microenterprise, Colorado Enterprise Fund, Inc.** - The City of Boulder invested \$50,000 in CDBG funds to cover the administrative costs of their microloan program in Boulder. This program includes the creation of economic opportunities for low - to moderate income

people who own and operate small businesses in Boulder. Program services provided by Colorado Enterprise Fund, Inc. include business training, counseling and technical assistance, loan monitoring and servicing, and Boulder program marketing and outreach.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME
White	16	32
Black or African American	0	0
Asian	2	0
American Indian or American Native	0	3
Native Hawaiian or Other Pacific Islander	0	0
Total	18	35
Hispanic	2	3
Not Hispanic	16	32

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Populations served by Boulder funds as shown in the table above, include families and persons served and are representative of the population mix of the city. Current demographics for the population of the city of Boulder - White 87.7% / Asian 5.8% / Other Race & Ethnicity, including Hispanic 1.51%

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	913,871	855,396
HOME	public - federal	2,604,176	1,953,579
Other	public - federal	1,079,301	0

Table 3 - Resources Made Available

Narrative

In 2020, CDBG funds were utilized to cover economic development (\$50K), improvements to public facilities (\$551K), youth services and homeless prevention (\$112.5K) within the city limits of Boulder. Some funds also covered general program administration costs (\$142K).

HOME funds were utilized within the HOME Consortium Region (described further below) to cover Tenant-Based Rental Assistance (TBRA), affordable housing development and rental housing assistance. See below for details on apportionment of funds.

The "Other" source of funds category includes the CDBG – CV funds. In 2020, due to the COVID – 19 pandemic HUD provided the City of Boulder with additional funds to support the City’s preparation, response to, and prevention of COVID – 19. Through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) the City of Boulder was awarded \$1,079,301 in CDBG – CV funds. CDBG – CV funds are multi-year grants, that may be used after the 2020 program year. The bulk of the CDBG-CV funding was allocated to a Rental Housing Assistance activity in the 2020 Action Plan. These activities were delayed as other sources of federal funding (e.g. Coronavirus Relief Funds awarded to the City of Boulder and Boulder County) were prioritized for deployment due to their more time -sensitive spending deadlines.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Boulder/Broomfield HOME Consortium Region	100	100	HOME Region

Table 4 – Identify the geographic distribution and location of investments

Narrative

Prior to 2015, HOME funds received by the HOME Consortium were distributed to the Consortium members based on a set percentage (City of Boulder – 50%, City of Longmont – 23%, Boulder County – 20%, City and County of Broomfield – 7%). The City of Longmont oversees its own distribution of HOME

funds. City and County of Broomfield has used its funds to support a Tenant Based Rental Program. The City of Boulder oversees distribution of its HOME funds as well as the funds designated for Boulder County. In 2015, the HOME Consortium members transitioned to employing a rotational distribution of funding which HOME awards funds are rotated throughout the region with each jurisdiction receiving the majority of the funds to pursue a project of magnitude. Each year, the actual of awarding of funds will be evaluated by the HOME Consortium members to ensure funds ultimately support an eligible project that best meets the housing needs of the Consortium area.

The purpose of this adjustment is threefold: 1) Concentrate HOME resources to simplify and expedite individual affordable housing projects; 2) Reduce the administrative burden of managing multiple HOME projects across the region; 3) Support the Ten-year Plan to Address Homelessness by supporting a regional approach to provide transitional and permanent housing to individuals experiencing homelessness.

All CDBG funding allocated to the City of Boulder is allocated to support activities within the Boulder city limits. CDBG funds are prioritized to meet the housing needs of low and moderate income households, the capital improvement needs of service providers, and public services that target low - and moderate-income residents. The geographic location of the programs is dependent upon the request for funds, as the City's program is historically driven by an annual competitive application process. Given COVID-19, the City faced lay-offs in 2020, including the position of Funding Administrator, a major role in the facilitation of the annual application process. Further staffing changes were implemented to re-structure the Community Investment Team, adding a second Compliance and Project Manager role. Due to these factors, the competitive application process was modified for a mixed approach which included limited application process, solicitation of applications from qualified organizations and an open door unsolicited application process during COVID-19.

In 2020:

- The City of Boulder oversees distribution of its HOME funds. For 2020, these funds were utilized in support of a Habitat for Humanity project called Violet Avenue. This project will provide 19 units of affordable housing on more than an acre in north Boulder, making this Flatirons Habitat's biggest-ever build. The units will all be permanently affordable by deed restriction.
- The City of Longmont oversees its allocation of HOME funds. For 2019 and 2020, their funds were pooled with Boulder County's apportionment of funds for The Spoke on Coffman Project. The new neighborhood will consist of 73 1- to 3-bedroom apartments, affordable to households with income up to 60% AMI.
- City and County of Broomfield used its funds to support its Tenant Based Rental Program. This program is administered through the Health and Human Services Department, serving an estimated 10 families annually.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

All Participating Jurisdictions (PJs) must contribute or match no less than 25 cents for each dollar of HOME funds spent on affordable housing. As PJs draw funds from HOME Investment Trust Funds, they incur a match liability, which must be satisfied by the end of each federal fiscal year.

The City of Boulder met match liability requirements via funding expenditures from the city affordable housing fund, a local funding source, for affordable housing projects. Per the HOME waiver issued for Match Liability requirements, the City has no Match Liability for 2020. Nonetheless, the carry-over from the previous year was enough to cover the Match Liability requirement amount that would have been incurred in 2020.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	533,397
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	533,397
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	533,397

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	0	0	0	0

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	1	0	0	0	1	0
Dollar Amount	1,151,230	0	0	0	1,151,230	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	27	4	23			
Dollar Amount	8,057,035	1,718,053	6,338,982			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	420	325
Number of Non-Homeless households to be provided affordable housing units	92	12
Number of Special-Needs households to be provided affordable housing units	0	0
Total	512	337

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	50	18
Number of households supported through The Production of New Units	92	12
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
Total	142	30

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

For the City of Boulder, the number of households supported through Rental Assistance was less than expected simply because other sources of federal funding were created with specific RA focus and with more aggressive spending deadlines. Because these funds were not deployed as anticipated, the numbers served did not reach the expected levels.

The City of Longmont Fall River project, with the initial funding date in 2018, completed construction in 2020, and has contributed to our goal for affordable housing units. Fall River Apartments is a 60-unit building in North-East Longmont that serves the elderly with household incomes 30%, 40%, and 50% of the area median income. Twelve of the 60 units are affordable one and two bedroom apartments designated for seniors ages 62 and over.

Discuss how these outcomes will impact future annual action plans.

Although we are currently working on compiling the 2021 Action Plan, we expect that it will include a reduction in the amount of funding allocated to the Rental Assistance activity. We expect to re-allocate the funds to other needs that have been identified without an explicit funding source available.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	935	18
Low-income	251	0
Moderate-income	165	0
Total	1,351	18

Table 13 – Number of Households Served

Narrative Information

CDBG:

Family Resource School services families from income levels ranging from extremely low to the non-low moderate income levels. Not included in the chart above is the income category for “Non Low Moderate”, whereby the program served an additional 140 families bringing the total for all income levels served to 1,491.

FRS clients access services mainly in-person at the school sites. Due to COVID, the 2019-20 school year adjourned two months earlier than usual. Schools were closed on and off during the 2020-21 school year. While services were offered remotely via phone and online, culturally our served populations value face-to-face interaction and tend to mistrust accessing services in other ways than face-to-face. Once public health guidelines relaxed the Stay-At-Home order and essential services could be offered in-person, transportation, which is already a barrier for our populations, was a heightened issue. Due to loss of income and/or employment, many families were unable to afford fuel and/or keep their vehicles running (paying for insurance, routine and/or emergency maintenance became a lesser priority in contrast to higher needs for rent, food and child care). Many families experienced COVID and secondary effects of COVID (including mental health issues), making leaving the home and/or even completing simple things like a phone call, text or email difficult.

HOME:

Tenant-Based Rental Assistance Program (TBRA) is a two-year self-sufficiency program, providing rental assistance and supportive case management for low-income Broomfield families (inclusive of Broomfield City and County). The over-arching program goal is for families to be self-sufficient at the end of the two-year program. To meet eligibility, families must be homeless, living with family or friends, or have unsafe/unstable housing.

The City of Longmont, Fall River project completed construction and is fully leased-up, contributing to our number of households served via HOME funding in 2020. Twelve households with very low-income received affordable units in 2020 from this project.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Boulder participates in the HSBC Coordinated Entry program which assesses individual adults for program and sheltering assignment. One-year goals for outreach and assessment include:

- Coordinated outreach efforts between providers.
- Increased connection between Homeless Outreach Team, Municipal Court Navigation, and HSBC housing options.
- Targeted encampment outreach.

The City of Longmont will participate in the annual PIT Survey. Also, the City will fund the OUR Center to continue to provide intake, assessment and basic needs for people experiencing and those at risk of homelessness and HOPE for Longmont, which provides street outreach, navigation services, and sheltering. Furthermore, the City is working with the Boulder Shelter for the Homeless (BSH) to deliver housing focused outreach, diversion services, and assessment.

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency sheltering is coordinated across Boulder County, and sheltering services are aligned with the particular needs of individuals. In PY2020, the City of Boulder consolidated the year-round programs to one physical location in an effort to repurpose funding toward housing. Providers spent 2019 improving housing exits from shelters to make this consolidation possible without any loss of service.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Boulder County has significant prevention services and subsidies for housing stabilization. Its Housing Stabilization Program (HSP), funded by local tax revenue, administers funding to provide short-term rental and deposit assistance to community members experiencing homelessness or requiring temporary housing stability. The county funds longer-term stability for household transitioning from a Rapid Rehousing Program by issuing up to 50 Homeless Admission Vouchers for households meeting the

McKinney-Vento Homeless Assistance Act definition or a revised definition of “homeless” as defined by the HEARTH Act. In addition, the Family Unification Program (FUP), offers a supportive housing early intervention program providing housing and case management services to families with identified child welfare concerns and youth transitioning out of the foster care system.

Boulder complements this system by funding and providing a wide range of supports for extremely low-income individuals and families, to help them avoid becoming homeless. This support includes:

Direct services

- Childcare subsidies for families who have low-income families
- School-based wrap-around support for families
- Community resource referrals and case management for older adults
- Resources, including mediation, for landlords, tenants, and roommates
- Enforcement of “Failure to Pay Wages” ordinance

Community funding – local funds support

- Asset and income-building models such as Bridges Out of Poverty

Program

- Access to physical, behavioral and mental health care
- Access to quality childcare and preschool for children in households with low-income
- Legal services to avoid eviction or other issues leading to homelessness
- Re-entry mentoring and resources (e.g., ReFocus)

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Homeless Action Plan initiatives being explored and implemented include:

- Alternative financing mechanisms such as Pay for Success projects to reduce homelessness, including helping people obtain and retain housing;
- Improving a community dashboard on goals for housing homeless people in the community, and
- Strengthening landlord relationships to increase options for homeless individuals/families to gain housing, and for at-risk or formerly homeless people to retain housing.

The City has a comprehensive housing strategy under development that includes a commitment to affordable housing for low-income individuals and families.

The City of Boulder is also a lead partner in coordinating local efforts around development of a Coordinated Assessment and Housing Placement System (CAHPS) through the Metro Denver 25 Cities Initiative pilot project. This assesses individuals for housing needs based on a standardized evaluation of vulnerability and other characteristics, and matches them with housing resources available throughout the region.

Boulder County HHS will continue the following programs to help formerly homeless individuals and families transition from homelessness into permanent housing:

- Financial literacy classes;
- Public benefits screening, eligibility and enrollment – Families and individuals are screened for eligibility and enrolled in public benefits via PEAK (online benefits enrolment);
- Follow-up is provided by case worker to ensure families receive benefits (i.e. food assistance, Medicaid, Child Health Plus, cash assistance, etc.);
- Childcare Assistance Program enrollment;
- Access to domestic violence advocacy, counseling and support; and
- Access to Family Resource Centers (FRC), substance abuse and mental health services.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

As a part of the 2020-2024 Plan, the HOME Consortium partners performed a Human Services Needs Assessment to pinpoint specific gaps in service provision to help prioritize and efficiently allocate resources, including public housing.

Additionally, the City of Boulder will continue to support preservation and development initiatives pursued by Boulder Housing Partnership (BHP).

BHP Public Housing Example and Property Updates:

- **Arapahoe Court** will continue to be in the BHP Public Housing portfolio for at least the next five years. BHP recently replaced stairs and landings at the building, installed a public art mural, and will continue to manage the property in a manner that is safe and viable for the foreseeable future. See attached photos of the property.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

As a part of the Consolidated Plan, the City of Boulder along with other members of the Regional Consortium developed and now maintains a Citizen Participation Plan. Citizen Participation is an integral part of the overall planning, evaluation, assessment and implementation process of the Boulder County/Broomfield County Regional Consortium's Community Development Block Grant and HOME Investment Partnerships Programs, and any other grant program that is included in the Consolidated Plan submission, together referred to as the Community Planning and Development or CPD Programs. The purpose of this Citizen Participation Plan is to provide all of the citizens of Boulder and Broomfield Counties with the information and mechanisms to allow them to fully participate at all levels of the Consortium's CPD Programs. The Consortium recognizes the importance of citizen participation and fully endorses a philosophy that maximizes citizen involvement in housing and community development activities.

Key actions to encourage public engagement for the plan included:

1. A resident survey designed to collect information on residents' housing, community development and human services dispositions and needs, including the experience of discrimination, displacement, and eviction. The survey was marketed through social services agencies and family resource centers; housing agencies, including Consortium members and community partners; and local municipal jurisdictions;
2. Focus groups, hosted by partner agencies and held in Spanish and English, requested input from residents who have low income;
3. Interviews with stakeholders who work with residents who have low income to discuss policy and

program interventions for addressing needs;

4. Briefings to City Councils, County Commissioners and Housing and Human Services Boards; and
5. A 5-day comment period during which the draft Plan was offered for review, and two public hearings, which were held on May 26, 2020 in Longmont and Broomfield.

Other actions taken in 2020 included:

Community engagement for this Plan was designed to be inclusive and representative of a diverse set of target groups that have disproportionate housing needs. Very extensive outreach was performed on 16 different social media platforms by Consortium members, reaching over 130,000 followers (inclusive of all platforms utilized).

In 2020, HUD issued waivers allowing for certain amendments to the Citizen Participation Plan. A complete copy of the 2020 Citizen Participation Plan is included as an attachment within the 2020 FHEO Compliance Report. The COVID-19 Response and updates are included in the complete report.

Actions taken to provide assistance to troubled PHAs

Not Applicable

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

BCHA and BHP have continued to advocate for the removal of public policies that serve as barriers to affordable housing. This has included regional planning and cooperation to help identify County-wide solutions to negative public policies such as advocating for expedited planning reviews of affordable housing and fee waivers for projects that include affordable housing (91.215(l)).

Since the development of the last Plan, conducted in 2015-2019, the Consortium has strengthened its coordination and cooperation throughout Boulder County with creation of a Regional Strategic Housing Plan and, for Broomfield, a housing market analysis and strategy. The Regional Plan, developed by the Regional Strategic Housing Partnership made up of Boulder County, City of Boulder and City of Longmont, has set forth a goal of increasing the number of affordable homes countywide to reach 12 percent of its housing stock be made permanently affordable by 2035.

In March 2020, Broomfield established an ordinance that requires affordable housing in new developments of 20 percent of rentals and 10 percent of for sale units.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The Consortium member jurisdictions continue to partner with the State in the coordination of funding opportunities ensuring the leveraging of state, local and private investment funding to support housing and community development efforts. All Consortium members participate in the Metro Denver Homeless Initiative (MDHI), which facilitates, integrates, and tracks cooperative, community-wide and regional systems of care for people who have become homeless, to help them become stable, and work toward self-sufficiency.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The City of Boulder has partnered with Boulder County Housing Authority previously and now with the City of Longmont to administer a Minor Home Repair Program, that has an objective to evaluate and reduce lead-based paint hazards in low-income homes in the City of Boulder and the City of Longmont.

Also, City compliance staff conduct Lead Based Paint Visual Assessments on properties built prior to 1978. The City also requires owners and managers of permanently affordable rental housing built before 1978 to abide by HUD's Guidelines for the Evaluation and Control of Lead-Based Paint Hazards.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The Consortium is committed to reducing the number of households with income below the poverty level (roughly \$25,000 for a household of four) by providing them with programs to motivate and assist them to move toward self-sufficiency. Jurisdictions work with various service providers and other units of local government to provide supportive services to residents with low income. As housing is one of the most critical issues for these households, the Consortium will continue to provide and seek additional resources to preserve and create housing opportunities.

The City of Boulder will continue to focus its efforts and resources to reduce the number of poverty-level families through the preservation and creation of safe and affordable housing. The foundational importance of meeting the housing needs of poverty-level families will support them moving toward self-sufficiency. Continued and expanded coordination with the City's Human Service Fund provides the opportunity to support the agencies serving poverty-level families. Expanded coordination with the City's Economic Vitality Program will provide opportunities for poverty-level families to gain the training and skill-building, resources and supports that can lead them to achieving self-sufficiency.

Boulder's Community Mediation Services program also provides mediation, restorative justice and meeting facilitation services for all city residents, including neutral information regarding landlord-tenant matters. In conjunction with Longmont's Mediation Services program, these services have been expanded to cover the entirety of Boulder County during the COVID crisis, with the goal of preventing or minimizing evictions.

Each year, the City of Boulder also provides rebates to help compensate residents with lower incomes for the city sales tax they pay on food. Those seeking a rebate must fill out an application documenting their eligibility. In 2020, rebates were \$87 for individuals and \$265 for families. City residents who do not have permanent shelter are eligible for the refund and can meet the residency requirement by providing documentation that they are receiving services from a city recognized homelessness services agency.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Research indicates stakeholders believe that the region has the right institutional structure in place to provide needed services. The greatest challenge in the region is limited funding to serve the growing number of residents who need services.

The City of Boulder Department of Housing and Human Services will continue to administer the CDBG program. Activity selection and funding decisions will continue to be made in close coordination with the City's Human Services and Health Equity funds and the Community Vitality program. These decisions will continue to be influenced by the expertise of two Advisory Boards, appointed by the City Manager. The City will also continue its regular coordination meetings with housing and service providers.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City of Boulder has developed collaborative relationships throughout the region to enhance coordination of services and fill service gaps in the Consortium area. In the development process of the 2020-2024 Plan, more than 100 agencies were invited to contribute to the Plan by attending community meetings and open houses, participating in focus groups, responding to the 2020 resident survey, and helping to promote the survey to households with low and moderate income in the region. No agencies were expressly not consulted.

Notable collaborations include:

Boulder County Human Services Master Plan – All governments in the County and the Foothills United Way are joining to provide a common approach to defining, assisting and funding human service agencies. Its specific purpose is to enhance coordination and work to eliminate gaps in services while avoiding duplication of services.

Boulder County Homeless Plan Initiative – This collaborative served the same purpose as LHOT, but worked on a Ten Year Plan to Eliminate Homelessness in all of Boulder County. An Advisory Board was seated in late 2011 and met quarterly during 2019 to help move the County Plan implementation forward.

Boulder County Housing Collaborative – This group is made up of homeownership program providers in the County. It meets to identify common needs and goals, address gaps in service delivery, and marketing opportunities in an effort to provide seamless homeownership program service delivery throughout the County.

Boulder Broomfield Regional Consortium – Works to identify and address common housing needs, overcome gaps in affordable housing provision and increase the amount of HOME funding coming to our local region.

The City has been and will continue to work closely and effectively with Boulder Housing Partners and nonprofit housing providers. The City will continue its close coordination while nurturing relationships with for-profit developers able to help meet the affordable housing needs of residents. The City will continue to focus HUD Block Grant dollars on affordable housing opportunities and capital improvement needs of service providers, as well as continue to partner with community-based agencies to devise and support creative solutions to meet their capital improvements needs. Furthermore, the City will continue to work closely with the Human Services Fund to ensure service providers' access to the service dollars available.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

As a part of the development of the 2020-2024 Plan, a regional Analysis of Impediments to Fair Housing Choice (AI) was utilized as a data source. According to the AI, which analyzed data from area public housing authorities, housing authority clients largely have extremely low incomes. Many are older adults and are unlikely candidates for ownership housing. For those interested in ownership, the most effective programs are likely land trusts and/or stabilizing ownership within mobile home park communities.

- Residents living in BCHA properties have predominately extremely low - to very low-income — 63 percent make an income of 30 percent AMI or less and 17 percent make an income of 31 to 40 percent AMI.
- Residents living in BHP properties have income ranging from extremely low to moderate income, with slightly more residents making between 50 percent AMI or more. Twenty-one percent of BHP residents live with a disability and these residents are mainly older adults.
- Longmont Housing Authority clients are slightly higher income with the majority of residents making between 31 and 59 percent AMI. Twenty-eight percent have a disability.

The City of Boulder approaches funding priorities and strategic goals with equity framework. All housing authorities connect clients expressing an interest in ownership to area nonprofits specializing in homeownership and self-sufficiency.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Monitoring is an ongoing process of reviewing the City's program performance and the performance of fund recipients. It involves using all available data in making judgments about appropriate funding and performance. City of Boulder staff also conduct annual on-site monitoring reviews of federally funded activities and CHDO's. On-site reviews are conducted according to the CDBG and HOME program requirements which include an annual risk assessment of rental housing properties to determine monitoring frequency. At minimum, all rental housing properties are monitored every three years.

Typically, additional on-site visits are conducted if findings in the initial on-site visit deem it necessary. As a condition of 2020, HUD provided waivers and flexibilities to grantees that supported grantees in navigating the COVID-19 pandemic. Flexibilities were provided in a variety of categories including within each of the HUD funding programs, citizen participation requirements, environmental reviews, and home quality inspections. Due to COVID-19, all HOME-assisted rental housing properties and CDBG funded projects were monitored remotely. On-site housing quality standard unit inspections were suspended as referenced in the HOME Waiver.

On-going monitoring of federally funded projects are conducted by staff in the Department of Housing and Human Services, Community Investment Team through review of quarterly progress reports, annual tenant and beneficiary reports, reimbursement requests, financials and single audits. Analysis of recipient records and activities may indicate a need for special monitoring visits by City staff to resolve or prevent further problems.

In addition to the City's monitoring of City funded programs and projects, the City also monitors HOME Consortium members to ensure the projects they fund are in compliance with applicable rules.

City of Longmont staff conducted monitoring on projects under contract in its own jurisdiction. Monitoring included but was not limited to:

- Documenting HOME compliance with requirements for conducting subrecipient monitoring.
- Assuring that funded projects comply with established regulations and that project activities continue to serve the target population identified in the initial application.
- Assuring HOME recipients are complying with applicable federal regulations.
- Assuring compliance with the Federal Office of Management and Budget (OMB) Circulars and local regulations relating to financial management systems, procurement and contracting, labor standards,

record keeping, and reporting requirements.

In 2020, a total of 30 projects were scheduled to be monitored, however due to the COVID-19 Pandemic processes were modified to align with HUD issued waivers that impacted on-site monitoring and home quality unit inspections. Twelve Projects were monitored in 2020 which included 7 HOME-assisted properties and 2 CDBG projects none of which resulted in concerns or findings. Units were not inspected due to the COVID-19 process changes.

Monitoring reports, according to standard process, reflect the dates of the monitoring visits, areas monitored, the findings and concerns (if applicable), when they are resolved (if applicable), as well as areas still to be monitored. All reports are located in the respective files.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Pursuant to the Boulder Broomfield Regional Consortium Citizen Participation Plan, this CAPER allowed for reasonable notice for accessibility, review, and comment, as well as a comment period prior to submission of 30 days. The public was given thirty (30) days to comment on the CAPER. As of ____06/30/2021_____, the Consortium received ___0__ Comments.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The City's timeliness test was passed in 2019, though funds were not received until the day prior. The receipt of funding annually 10 months through the program year is a challenge for City staff and non-profits alike.

In 2020, the City received a CDBG Timeliness Warning for accruing a balance in its CDBG line of credit above 1.5 grant years worth of funds. However, City staff were able to meet timeliness via our final draw for the SPAN rehabilitation project that helped us meet our timeliness goal.

In 2020, the City of Boulder Community Investment Team experienced staff changes whereby the role of the Funding Administrator was eliminated and a second Compliance Manager role was added to improve oversight of project management. City staff continue to welcome the opportunity to work with HUD staff to determine actions we might take in the future to mitigate the impacts of the unpredictability of the arrival of the HUD funds. To this end, City staff has been engaging HUD staff in quarterly check in calls to ensure consistent updates and communication.

As a major priority, City staff are also strengthening the City's standard operating procedures and working with sub-recipients to ensure the timeliness standard will continue to be met year over year.

Actions include:

- Identify activities that demonstrate readiness and delineate activity commencement, milestones and completion dates in funding agreements.
- Strengthen compliance and monitoring activities using the funding agreements as a mechanism to track timeliness.
- When necessary, reallocate funds from untimely subrecipients to activities that are ready to expend funds.

City staff intend for these system improvements to ensure the City's timely expenditure of funds and to ensure the expedient expenditure of the existing CDBG fund balance to maintain a status of compliance.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Projects Scheduled for Monitoring in 2020:

- 2301 Goss
- Attention Homes - Broadway
- Attention Homes - Chase House
- Attention Homes Residences
- BCHA Aspinwall
- BCHA Housing & Community Ed
- BCHA Josephine Commons
- BCHA Kestrel
- BCHA Lafayette Geneseo
- BHP Broadway East
- BHP Broadway West
- BHP Casey
- BHP Ciclo
- BHP Trout Farms
- BHP Twenty37
- Boulder Shelter Transitional Housing
- Broomfield TBRA
- Element Osage
- Element The Nest
- Element Thunderbird
- Golden West Manor
- Longmont Fall River Apartments
- Orchard House
- Safehouse (SPAN Rehab)
- The View on 26th St. (The HUB)
- Thistle Bustop

- Thistle Correll
- Thistle Diagonal Crossing
- Thistle Sage Court

Projects monitored in 2020:

- Attention Homes - Chase House
- BCHA Aspinewall
- BCHA Josephine Commons
- BCHA Kestrel
- BCHA Lafayette Geneseo
- BHP Broadway East
- BHP Broadway West
- Boulder Shelter Transitional Housing
- Thistle Bustop
- Thistle Correll
- Thistle Diagonal Crossing
- Thistle Sage Court

Due to the COVID-19 Pandemic processes were modified to align with HUD issued waivers that allowed flexibility in navigating the City’s ability to function within the circumstances of the pandemic. In total, twelve Projects were monitored in 2020, none of which resulted in concerns or findings. The remaining properties are scheduled to be monitored in 2021 in accordance with HUD issued waiver guidelines.

**Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units.
92.351(b)**

The City of Boulder actively promotes fair housing through ongoing funding of fair housing services; adoption and implementation of an “Analysis of Impediments to Fair Housing Choice”; adoption of a Consolidated Plan for CDBG/HOME programs, with an analysis and strategy for fair housing every five years, and in the Annual Action Plan; annual monitoring of fair housing activities through monitoring of fair housing services and reporting on ongoing activities in its Consolidated Annual Performance and Evaluation Report (CAPER).

The City of Boulder, Dept. of Housing and Human Services is responsible for the implementation of the Affirmative Marketing Plan and all owners, developers, Community Housing Development Organizations and other non-profits must comply with this policy for all CDBG, HOME and City funded housing developments. The City uses the following methods to inform the public, potential tenants, potential homeowners, potential and existing for-profit developers, potential and existing non-profit developers, and local units of government about Federal Fair Housing laws and Affirmative Fair Housing Marketing Plan and Procedures.

- A. The City staff is responsible for implementing the Marketing Plan and evaluating its effectiveness as required by the CDBG/HOME Program.
- B. The City informs the community about its Affirmative Marketing Policy through periodic updates at public forums and Fair Housing meetings, as well as training workshops with its CDBG/HOME grantees or other similar forums.
- C. The City provides fair housing information/referrals, case investigation services, tenant/landlord information/referrals and mediation services.
- D. The City collaborates with the office of Human Rights to reduce discrimination in housing.
- E. The City refers tenants and rental property owners to the Community Mediation and Resolution Center (<https://bouldercolorado.gov/community-relations/mediation-program>) regarding tenant and landlord rights and responsibilities.
- F. The City provides information about fair housing, fair housing service providers, fair housing brochures and a copy of the City Affirmative Marketing Plan is available on the City Department of Housing and Human Services, Asset Management website <https://bouldercolorado.gov/housing/grants-compliance-and-asset-management>.
- G. The City continues to provide general information and telephone reference numbers to persons contacting the City of Boulder, Department of Housing and Human Services with questions regarding Affirmative Marketing and Federal Fair Housing laws.
- H. The City requires that Grantees of CDBG and/or HOME funded rental/homebuyer housing provide an annual report describing how their actions have complied with the City Affirmative Marketing Plan. (see attachment)
- I. The City periodically posts flyers and brochures which describe fair housing laws and services in open public areas.
- J. Grantees of CDBG/HOME funds instruct all employees and agents on the policy of nondiscrimination of fair housing both in writing and orally.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The HOME program entered into to a revolving rotation within the Regional Consortium, therefore HOME program income is retained within our sub-agreement to be held in a separate fund by the City of Longmont.

In 2020, the Consortium received repayment from a Boulder-funded project called Discovery that faced issues with timely completion and had to repay \$60,000 in funding. The Consortium applied those funds to Boulder County Housing Authority (BCHA), The Spoke on Coffman project. The new neighborhood will consist of 73 1- to 3-bedroom apartments, affordable to households with income up to 60% AMI.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

Boulder County has addressed gaps identified in the Needs Assessment over the past five years through housing development, using federal and state Low-Income Housing Tax Credit (LIHTC) dollars and gap funding from HOME and CDBG, as awarded by the State, and preservation projects through BCHA general funds.