

State of Colorado: Annual Action Plan 2022-2023

Plan for U.S. Department of Housing and Urban Development Emergency Solutions Grant (ESG), Community Development Block Grant (CDBG), HOME Investment Partnership (HOPWA), Housing Opportunities for Persons with HIV/AIDS (HOPWA), and National Housing Trust Fund (HTF) Programs

Annual Action Plan
2022

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The State of Colorado receives annual grants from the Department of Housing and Urban Development (HUD). In order to receive those funds, the State is required to prepare and submit a 5-Year Consolidated Plan with Annual Action Plans. This Annual Action Plan will cover the period from April 1, 2022 through March 31, 2023.

By submitting this Plan the State is applying for formula grants for five programs: the Community Development Block Program (CDBG), the HOME Investment Partnership program (HOME), the National Housing Trust Fund (HTF), the Emergency Solutions Grant program (ESG), and the Housing Opportunities for Persons with AIDS program (HOPWA).

The State's Department of Local Affairs (DOLA) is the lead agency in administering these funds, and uses them to further its mission of strengthening Colorado communities consistent with the intent of the programs and in compliance with the laws and regulations that govern them. The State of Colorado is committed to providing equal housing opportunity to all of its residents.

Within DOLA, the Division of Local Government (DLG) is the lead agency for administering CDBG funds. The Division of Housing (DOH) is the lead agency for the HOME, HTF, ESG, and HOPWA programs.

The Consolidated Plan is used by HUD to understand the programs and goals of the state and also to enhance "public accountability... and to facilitate coordination of activities with different levels of government (42 U.S.C. § 5304)." It contains information on a variety of programs including: rental assistance vouchers, public housing, low-income housing tax credits, and state funded housing programs. However, its primary purpose is to describe how these five HUD formula block grant programs administered by the State of Colorado can meet the needs of communities and support other federal, state, and local programs.

This document does not contain any information on the supplemental funds provided to the CDBG, ESG, and HOPWA programs to prevent, respond to, and prepare for coronavirus through the Coronavirus Aid, Relief, and Economic Security Act (P.L. 116-136). These supplemental funds are discussed in the 2019 Annual Action Plan, which may be found on the website of the Division of Housing of the Department of Local Affairs. Nor is this a plan for State and Local Fiscal Recovery Funds (SLFRF) from the American Rescue Plan Act (ARPA), colloquially referred to as ARPA funds.

Similarly, though this plan discusses other HUD programs administered by the state such as Housing Choice Vouchers and the Continuum of Care Program, these other federal programs have completely distinct planning and reporting processes -- information on these programs may also be found on the

website of the Division of Housing and its sub-recipients. Housing programs overseen by the U.S. Department of the Treasury, such as the Emergency Rental Assistance Program or Homeowner Assistance Fund, are not included in this report either -- readers may learn more about these programs on the website of the Division of Housing.

This plan consists of 5 sections: The Process (outlining citizen participation and consultation), Needs Assessment (concerning the housing and community development needs of persons), Market Analysis (examining macroeconomic and housing market trends), The Strategic Plan (about Colorado's five-year priorities and goals to resolve these needs and trends), and the Action Plan (Colorado's one-year goals, allocation priorities, and distribution methods).

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Six of the plan goals address the objective of providing decent affordable housing for all: increase the supply of affordable housing, preserve existing affordable housing, homelessness prevention and alleviation, improve housing affordability, affirmatively furthering fair housing, and build housing non-profit capacity. All of these work to improve the availability and accessibility of decent affordable housing through construction, acquisition or renovation of physical housing units, as well as activities such as down payment assistance and rental assistance in which the beneficiaries receive a subsidy to make housing more affordable to them. An overall increase in the supply of affordable housing benefits all residents of the state including the homeless and people with special needs.

Five goals lead to improved sustainability and resiliency of communities through the creation of suitable living environments: improve public facilities and infrastructure, support small business development, homelessness prevention and alleviation, affirmatively furthering fair housing, and expand public services. All of these goals foster vibrant, livable, and equitable communities.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Colorado's Consolidated Annual Performance and Evaluation Report (CAPER) provides a snapshot of the State's progress in meeting its performance goals. The goals that were met in the 2020 CAPER, running

from April 1, 2020 through March 31, 2021, are as follows:

- Rehabilitated 160 single-family owner-occupied homes to preserve the current supply of affordable housing.
- Provided rapid-rehousing assistance to 125 households experiencing homelessness
- Provided homeless prevention services to 618 persons.
- Awarded 7 operating grants to Community Housing Development Organizations to increase their capacity and support development of future affordable housing projects and programs.
- Created or retained 140 jobs.

The State of Colorado did not meet its goals for rental new construction and acquisition or rehabilitation, homeownership new construction, public facilities and infrastructure, fair housing, or public services. These program areas had lower production than anticipated due to the impacts of the COVID-19 pandemic on program administration, but are expected to recover in the coming years so their goals will remain unchanged.

Less persons were served at federally funded overnight shelters than anticipated because shelters that were historically assisted with federal funds are now assisted with state funds, and thus are excluded from the scope of these federal plans and reports. The homeless person overnight shelter goal is being revised downwards to reflect this new structure. Readers should note that the state is still committed to efforts to end homelessness, merely the way in which these efforts are funded and reported on is changing.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

DOLA took advantage of existing and ongoing engagement processes that include stakeholder consultation to develop major elements of this Consolidated Plan.

For housing programs, the first and largest consultation process was the Division of Housing's 2019 stakeholder engagement meetings and survey. Another was in conjunction with development of the PHA Agency Plan, during which DOH solicited input from public housing authorities and other organizations that receive housing choice vouchers from the State. These include a number of organizations that serve people with disabilities and those who would otherwise be homeless. The Division of Housing's Office of Homeless Initiatives (OHI) consults with the governing board for each Continuum of Care region in Colorado to coordinate the use of Emergency Solutions Grant and Continuum of Care funds, and OHI collaborates with several communities statewide on the Built for Zero initiative. OHI is also active on the State Emergency Operations Center Homeless Task Force, which includes a number of non-profit and local, state, and federal public sector partners.

The Division of Local Government consults with its partners individually and in more formal settings, such as at the annual Small Communities Workshop. Additionally, DLG communicates with the Colorado Department of Public Health and Environment; this ongoing dialogue informs community needs for water and wastewater projects.

Finally, the Office of Economic Development and International Trade, which funds economic development activities with CDBG with support from DLG, convenes the 14 business loan funds throughout the state in the fall and in the spring of each year to discuss the CDBG Economic Development program, provide training, and receive feedback on program design and effectiveness.

Public comments and citizen participation are detailed in section AP-12.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Public comments and citizen participation are detailed in section AP-12.

6. Summary of comments or views not accepted and the reasons for not accepting them

Public comments are detailed in section AP-12.

7. Summary

Meaningful citizen engagement and consultation occurred prior to the development of this plan, as described above. DOLA believes that its extensive ongoing efforts to communicate and collaborate with stakeholders in both informal settings and formal public meetings allowed ample opportunity for input and feedback on state housing and community development programs.

PR-05 Lead & Responsible Agencies - 91.300(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

| Agency Role | Name | Department/Agency |
|-----------------------|----------|--|
| Lead Agency | COLORADO | |
| CDBG Administrator | COLORADO | Department of Local Affairs/Div of Local Gov't |
| HOPWA Administrator | COLORADO | Department of Local Affairs/Div of Housing |
| HOME Administrator | COLORADO | Department of Local Affairs/Div of Housing |
| ESG Administrator | COLORADO | Department of Local Affairs/Div of Housing |
| HOPWA-C Administrator | | |
| | COLORADO | Department of Local Affairs/Div of Housing |

Table 1 – Responsible Agencies

Narrative

The Department of Local Affairs (DOLA) is the lead agency for the application. Two divisions within DOLA lead the administration of HUD formula programs, coordinating and reporting on these HUD funds under the authority of the DOLA Executive Director. The lead agency for the CDBG program is the Division of Local Government, and the Division of Housing is the lead agency for the HOME, ESG, HTF, and HOPWA programs. The Governor’s Office of Economic Development and International Trade administers economic development programs with CDBG funds, in close coordination with the Division of Local Government.

Consolidated Plan Public Contact Information

Consolidated Plan Coordinator
 Colorado Department of Local Affairs

1313 Sherman St., Room 320
Denver, CO 80203-2241

Main Number: 303-864-7810
TDD/TTY Number: 303-864-7758
Media Inquiries: 303-864-7864

AP-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

To gain insight on housing and homeless needs in communities across Colorado, in the summer and early fall of 2019, the Division of Housing conducted outreach and engagement events throughout the state in collaboration with Housing Colorado and the Colorado Housing and Finance Authority in Denver, Durango, Fort Collins, Frisco, Grand Junction, and Pueblo. DOH also held smaller events in Bent County, Gunnison, Keystone, Limon, and Ouray. For those who couldn't attend an event, DOH solicited detailed stakeholder input via an online survey.

DOH reached a total of 868 stakeholders in this process, representing numerous constituents. Stakeholders came from 54 of Colorado's 64 counties, covering a wide range of urban and rural perspectives. They also represented a variety of organizations, including 28 PHAs, 70 nonprofit and for-profit housing developers and providers, 37 counties, 67 municipal governments, nearly 200 health and service providers, as well as individuals with lived experience and concerned citizens.

The major stakeholder events were facilitated as roundtables; participants rotated between tables that covered topics relevant to them. In the first portion of the events, table topics included affordable rental housing, homeownership, mobile homes/manufactured housing, land trusts/land banks, homeless solutions, rental assistance, and other creative ideas. In the second part of each event, representatives from each community (city/county) were grouped together to discuss their specific needs and feasible solutions, with a separate table for developers to discuss regional issues across the jurisdictions they serve. This effort yielded rich and detailed feedback on housing and homeless needs statewide.

Additionally, through its underwriting, contract management, and program management teams, DOH engages with stakeholders, subrecipients, and developers on an ongoing basis. Staff hold annual gatherings with owner-occupied housing rehabilitation agencies to update them on changes to the program, provide training, and gather insight on program operations at the local level. It is also an opportunity for agencies to exchange ideas and best practices with one another. DOH held its first similar event for subrecipients operating down payment assistance programs in January 2020, and plans to continue into the future. Finally, DOH staff regularly engage informally with developers and subrecipients on their individual projects and programs, always seeking feedback to optimize program operations and deliver and preserve as many housing units as possible for low-income Coloradoans. This input informs program design decisions that influence the Consolidated Plan and Annual Action Plans.

Finally, DOH's Office of Homeless Initiatives works with countless partners to expand housing, shelter, and services for Colorado's most vulnerable citizens. These partnerships are detailed below.

For non-housing community development needs, the Division of Local Government engages with its partners on an ongoing basis via Regional Field Offices throughout the state. Additionally, they hold

annual events, such as the Small Communities Workshop, in which they discuss the CDBG program, eligible uses, and how to apply. Finally, the Office Economic Development and International Trade holds two meetings annually with operators of its Business Loan Funds to present, review, and troubleshoot CDBG programs.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies

The Division of Housing takes the following actions and collaborates with the following organizations to enhance coordination between public and private housing and social service agencies:

-DOH facilitates interagency coordination of housing, health and social service activities of various public and private agencies by participating in the following efforts:

The DOH Office of Homeless Initiatives (OHI) administers the State Housing Voucher Program, partnering with the Colorado Department of Human Services and statewide community mental health centers to administer state-funded housing vouchers with supportive services for participants with mental health disorders experiencing homelessness. As part of this effort, OHI collaborates with the following agencies:

- Various offices and divisions within the Colorado Department of Human Services, including child welfare and youth services providers (e.g. Bridging the Gap, Pathways to Success, and Rural Collaborative), Office of Behavioral Health, Division of Youth Services (DYS), and the state mental health institutions;

- The Colorado Department of Corrections and several local jail systems and sheriff offices and re-entry programs;

- The Colorado Department of Education (CDE) and several local school districts; and

- AmeriCorps Volunteers in Service to America (VISTA) in partnership with the Colorado Department of Education, Division of Youth Services and the Rocky Mountain Law Center to incorporate youth voice and improve systems coordination across our work.

- As part of the Office of Homeless Initiatives, the Office of Homeless Youth Services, a program within the Division of Housing, meets on a regular basis with statewide agencies to establish goals, objectives and to seek funding through the facilitation of the Advisory Council of Homeless Youth (ACHY).

Joined the Built for Zero initiative in 2019. This effort unites communities representing 15 counties with statewide entities to meet the needs of veterans experiencing homelessness and people experiencing chronic homelessness in Colorado. The effort is supported by Community Solutions, Kaiser Permanente,

and the Colorado Department of Local Affairs' Division of Housing. Participating local teams include: Metro Denver (including representatives from Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, and Jefferson counties), which joined in 2016, and Fremont County, Grand Valley (Mesa), Roaring Fork Valley (Pitkin/Garfield/Eagle), Northern Colorado (Weld/Larimer) and Pikes Peak (El Paso), which joined in September 2019. Built For Zero communities work collaboratively across sectors to establish rigorous goals and corresponding benchmarks intended to drive measurable reductions and reach a sustainable end to homelessness. The Built for Zero effort supports technical assistance and outreach to help communities identify all people living outside by creating an accurate by-name list. By starting with veteran and chronic homelessness, Built For Zero Colorado aims to develop the infrastructure, policies, practices, and resources needed to create a broader continuum of effective solutions.

Other Coordination Efforts Not Specific to Homelessness:

- DOH participates in quarterly Housing Pipeline meetings, during which development staff from DOH, the Colorado Housing and Finance Authority (CHFA), USDA Rural Development, US Department of Housing and Urban Development (HUD) and Community Development Financial Institutions (CDFIs) meet and discuss the pipeline of projects statewide.
- Housing Colorado, Inc. is a 501(c)(3) membership organization that facilitates workshops, meetings and educational opportunities for housing organizations.
- Colorado Chapter, National Association of Housing Redevelopment Organizations (NAHRO) is a state trade association for housing authorities and redevelopment agencies.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

DOLA's Office of Homeless Initiatives (OHI) coordinates with all four Continua of Care (CoC) in Colorado to address the needs of homeless persons, especially the priority populations identified in "Opening Doors," the federal strategic plan to end homelessness released in 2010, as well as other national best practices and guidance, such as NAEH, Point Source Youth (for Host Homes for youth experiencing homelessness), A Way Home America, National Healthcare for the Homeless, National Coalition for the Homeless, and several Technical Assistance Agencies, such as CSH and Community Solutions...

- OHI staff participate formally and regularly with all four Continuum of Care regional bodies, including as advisory board members and members of various committees. We present at least annually as well. We participate in the PIT and lead the Youth Supplemental Survey efforts in coordination with the CoCs.
- OHI staff often lead the efforts to create the Coordinated Entry Systems within smaller communities and rural regions of the state (e.g. southeastern Colorado, Mesa County region,

northeastern Colorado, the Roaring Fork Valley, Montrose), which encompass many subregions of the Balance of State Continuum of Care

Describe consultation with the Continuum(s) of Care that serves the State in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

DOLA coordinates with each Continuum of Care (CoC) for the annual allocation of State Emergency Solutions Grant (ESG) funding by issuing an application for funding aligned with the annual HUD priorities, and those identified in the federal strategic plan. Once applications for ESG funding are received, DOLA allocates Homeless Prevention and Rapid Rehousing funding regionally based on recommendations from each CoC. Based on the performance outcomes identified by HUD, DOLA works with the CoCs and statewide HMIS administrator to evaluate on a quarterly and annual basis the performance of each ESG sub-recipient. The Colorado statewide HMIS (comprised of all four CoCs) has established policies and procedures that are updated annually. DOLA monitors sub-recipients for their participation in HMIS and reports to the CoCs; sub-recipients are referred to the statewide HMIS administrator for training and technical assistance when needed. Current statewide HMIS policies and procedures can be found here: <http://mdhi.org/colorado-hmis/colorado-hmis-info/>.

DOLA also has a voting member on the Colorado HMIS Collaborative. The purpose of the Collaborative is to manage the implementation, administration, and maintenance of the statewide Homeless Management Information System (HMIS) database collectively. The Collaborative strives to identify ways to help the four Colorado CoC and the State of Colorado to record, report on, and improve the provision of housing and services through the statewide HMIS database. The Collaborative will also be the primary HMIS advisory entity for each CoC.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

| | | |
|---|--|---|
| 1 | Agency/Group/Organization | Colorado PHA CO911 |
| | Agency/Group/Organization Type | PHA Grantee Department |
| | What section of the Plan was addressed by Consultation? | Public Housing Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted to complete the PHA and special needs populations portions of the Consolidated Plan. The expected outcome is improved coordination of housing choice voucher use with Consolidated Plan programs. |
| 2 | Agency/Group/Organization | Colorado Resiliency Office |
| | Agency/Group/Organization Type | Other government - State Grantee Department |
| | What section of the Plan was addressed by Consultation? | Broadband/Resiliency |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The CRO is part of the Grantee department, and CPD program administrators coordinate with them on an ongoing basis. Helped author resiliency sections of the needs and market analyses. |
| 3 | Agency/Group/Organization | Colorado Department of Homeland Security and Emergency Management |
| | Agency/Group/Organization Type | Other government - State Grantee Department |
| | What section of the Plan was addressed by Consultation? | Homelessness Strategy Resiliency |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted via meetings to implement disaster recovery preparedness and recovery. DHSEM also convenes group of federal, state and local government and non-profit service providers for State Emergency Operations Center Homeless Task Force. |

| | | |
|---|--|--|
| 4 | Agency/Group/Organization | Disability Law Colorado |
| | Agency/Group/Organization Type | Services-Persons with Disabilities Service-Fair Housing Advocacy |
| | What section of the Plan was addressed by Consultation? | Analysis of Impediments to Fair Housing |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | During the public input process the State met with Disability Law Colorado for input on the most common fair housing issues brought to their attention. |
| 5 | Agency/Group/Organization | COLORADO COALITION FOR THE HOMELESS (BOS) |
| | Agency/Group/Organization Type | Services - Housing Services-homeless |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consults with the Office of Homeless Initiatives as lead agency for the Balance of State Continuum of Care. |
| 6 | Agency/Group/Organization | Federal Emergency Management Agency Region VIII |
| | Agency/Group/Organization Type | Other government - Federal |

| | | |
|---|--|---|
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Market Analysis Economic Development |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted to develop resiliency framework and resiliency playbook. |
| 7 | Agency/Group/Organization | Colorado Health Network |
| | Agency/Group/Organization Type | Housing Services-Persons with HIV/AIDS |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs HOPWA Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Held a series of weekly meetings with DOLA staff who manage the HOPWA program to discuss HOPWA strategy and the needs of their clients. |
| 8 | Agency/Group/Organization | Colorado Division of Local Government |
| | Agency/Group/Organization Type | Other government - State Grantee Department |
| | What section of the Plan was addressed by Consultation? | Broadband/Resiliency |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Consulted with Broadband expansion point-of-contact to discuss funding for state Broadband efforts and determine status of progress. |

Identify any Agency Types not consulted and provide rationale for not consulting

All agency types were consulted, as noted above or during the Division of Housing’s Stakeholder Engagement efforts in 2019. The list of participants and topics covered is too extensive to include here. It is attached to this Plan as an appendix.

Other local/regional/state/federal planning efforts considered when preparing the Plan

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|-------------------|-------------------|--|
| Continuum of Care | Varies by CoC | One of our highest priority goals is eliminating homelessness through coordination with our Continuum of Care regions. |

Table 3 - Other local / regional / federal planning efforts

Narrative

The Colorado Department of Public Health and Environment manages the state’s Childhood Lead Poisoning Prevention Program. Representatives from the CDPHE Office of Health Equity participated in housing stakeholder engagement meetings in the summer of 2019. In addition, DOLA reviewed CDPHE data on areas in the state that present the highest risk for lead exposure to children, as well as on where children tested positive for elevated blood lead levels.

AP-12 Participation - 91.115, 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The public was notified that the Annual Action Plan would be posted on the website of the Division of Housing on July 11th , 2022 through an email that was distributed on June 10th, 2021. Comments were accepted over email and mail through August 10th, 2022 -- four of which were received over email. The notification was distributed through the Division of Housing's general email list to over 2,400 recipients which includes persons employed by the following types of organizations that represent or serve protected classes: disability advocacy and services, homeless advocacy and services, American Indian and Alaska Native advocacy and services, Racial and Ethnic Minority advocacy, civil rights enforcement, physical and behavioral health care providers, public housing authorities, philanthropy, and local, state, federal, and tribal government officials. The notice was translated into Spanish, which was also transmitted in the email.

The State of Colorado agrees with the hearing comments detailed below in that many restrictions placed on the residents of subsidized housing, especially for persons formerly experiencing homelessness, can result in poor outcomes for those persons. As such, Colorado encourages the use of, and provides technical assistance in, housing first practices which reduce barriers to the acquisition and maintenance of housing. Though DOLA lacks the authority to change federal statutes and regulations that result in barriers to program participation, it does contribute to the development of state statutes that improve access to housing and housing programs when permitted by the Governor. DOLA also collaborates with the State's Medicaid agency, HCPF, to provide health services to the residents of subsidized housing.

The State of Colorado agrees with the email comments detailed below in that that older adults have substantial unmet needs. However, HUD formula block grant programs are restricted by numerous federal statutes and regulations which would limit the impact that these specific programs can have in achieving the policy goals of the commenters. Transitional housing can be funded with the HOME and HOME-ARP programs, but operating subsidy for transitional housing is prohibited by federal regulation for ESG; therefore while funding is available for

transitional housing it is limited and must be balanced with needs for supportive housing. Though CDBG could support the housing costs of older Coloradans in the form of subsistence payments, the utility of this would be limited by federal regulations which mandate that such payments only cover six consecutive months of assistance and that Colorado only provide assistance in non-entitlement (primarily rural) areas; making this an impractical method for widespread or long-term rent and mortgage assistance. Deep capital subsidies for ELI units are presently encouraged by the HOME and HTF program in state procedure, though CDBG is a sub-optimal solution for long-term rental assistance for the reasons mentioned previously.

The comments received by the State of Colorado will not impact goal-setting for the CDBG, ESG, HOME, HOPWA, and HTF programs because these programs are not the most appropriate solutions for the policy problems raised by the commenters. However, these comments will also be considered in the development of new programs funded with Colorado General Funds and U.S. Department of Treasury State Fiscal Recovery Funds. These programs have less regulatory restrictions which likely makes them more flexible to achieve the goals of the commenters; some of these programs will also prioritize applicants that plan to serve older Coloradans. Additionally, although resources for long-term rental assistance are insufficient to meet demand Colorado participates in competitive applications for new federal vouchers to help close this gap.

Citizen Participation Outreach

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------------|---|---|--|--|---------------------|
| 1 | Virtual Public Hearing | Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing | 12 members of the public attended the virtual public hearing. | That more place based subsidy is required for housing which assists aged Coloradans (or tenant-based subsidy when that place based subsidy is insufficient), that restrictions imposed on beneficiaries of subsidized housing by statute/regulations/Colorado/grantees are deleterious and should be removed, and that funding should support the provision of dental services to the residents of subsidized housing. | N/A | |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (if applicable) |
|------------|------------------|--|---------------------------------|--|--|---------------------|
| 2 | Email | <p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> | 3 email comments were received. | Additional funding should be awarded to transitional housing developments targeted for older adults, additional funding should be awarded to programs that support the housing costs of households on fixed incomes, and additional funding should be awarded to projects with deep affordability requirements and voucher programs. | N/A | |

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

Below are the anticipated resources from CPD programs, as well as those from other federal and state sources. Expected amounts listed below are based on current trends and the best available information at this time; resources beyond the current fiscal year are estimates subject to numerous variables.

Anticipated Resources

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|------------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| CDBG | public - federal | Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services | 9,377,653 | 915,107 | 16,443,492 | 26,736,252 | 45,491,559 | Colorado on-Entitlement Community Development Block grant allocation. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|------------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| HOME | public - federal | Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA | 7,364,694 | 2,836,566 | 6,589,665 | 16,790,925 | 16,790,925 | HOME Investment Partnerships Program allocation for Colorado. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|-----------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| HOPWA | public - federal | Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA | 1,100,663 | 0 | 0 | 1,100,663 | 2,529,044 | Housing Opportunities for Persons with AIDS balance of state block grant allocation for Colorado. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|-----------|---|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| ESG | public - federal | Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing | 2,128,974 | 0 | 0 | 2,128,974 | 6,386,922 | Emergency Solutions Grants state block grant allocation. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|-------------------|------------------|--|----------------------------------|--------------------|--------------------------|------------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| HTF | public - federal | Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership | 10,917,121 | 0 | 1,476,991 | 12,394,112 | 34,228,354 | National Housing Trust Fund allocation targeting Extremely Low-Income Households. |
| Continuum of Care | public - federal | Permanent housing in facilities Supportive services | 8,364,748 | 0 | 0 | 8,364,748 | 28,673,703 | Continuum of Care grants received by the Division of Housing. The Division applies for these from HUD through annual NOFAs through Continuum of Care regions. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|--------------|------------------|--|----------------------------------|--------------------|--------------------------|------------|---|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| General Fund | public - state | Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership | 71,500,000 | 0 | 0 | 71,500,000 | 214,500,000 | DOH typically receives roughly \$70 million of state General Fund revenues annually, known as the Housing Development Grant (HDG) program. |
| Section 811 | public - federal | Rental Assistance | 1,305,006 | 0 | 0 | 1,305,006 | 3,915,018 | HUD Section 811 award for supportive affordable rental housing for extremely low-income persons with disabilities, to enable them to live independently rather than in institutional settings. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|--------------------------|------------------|--|----------------------------------|--------------------|--------------------------|-------------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| Tax Exempt Bond Proceeds | public - federal | Acquisition Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Permanent housing in facilities | 604,667,289 | 0 | 0 | 604,667,289 | 1,814,001,867 | This represents the Private Activity Bond volume cap available statewide. The PAB program funds privately developed projects. The bonds are tax-exempt and the amount of the bonds issued are limited by the IRS. Underwriters use investor money called bond proceeds, to make a loan to a project. The project then pays back the loan and the investors are repaid, plus interest. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|-----------------|--|----------------------------------|--------------------|--------------------------|------------|---|-----------------------|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| Other | private | Multifamily rental new construction Overnight shelter Permanent housing in facilities Short term or transitional housing facilities | 10,000,000 | 0 | 0 | 10,000,000 | 30,000,000 | |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|-------------|---|-----------------------|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| Other | public - federal | Acquisition Admin and Planning Conversion and rehab for transitional housing Financial Assistance Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab Transitional housing | 138,000,000 | 0 | 0 | 138,000,000 | 138,000,000 | |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|-----------|---|-----------------------|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| Other | public - federal | Acquisition Admin and Planning Conversion and rehab for transitional housing Financial Assistance Multifamily rental new construction Multifamily rental rehab Permanent housing in facilities Permanent housing placement Rapid re-housing (rental assistance) Rental Assistance Services Supportive TBRA Transitional | | | | | | |
| | | | | Annual | Action Plan 2022 | | | 29 |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|-------------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| Other | public - federal | Acquisition Housing Multifamily rental new construction Multifamily rental rehab | 452,129,680 | 0 | 0 | 452,129,680 | 1,528,089,282 | Federal 9% Low-Income Housing Tax Credit |
| Other | public - federal | Admin and Planning Public Improvements | 40,000,000 | 0 | 0 | 40,000,000 | 40,000,000 | |
| Other | public - federal | Housing Services Short term or transitional housing facilities Supportive services | 50,000,000 | 0 | 0 | 50,000,000 | 50,000,000 | |
| Other | public - federal | Rental Assistance | 57,680,704 | 0 | 0 | 57,680,704 | 182,507,514 | Funds received through HUD's Public and Indian Housing HCV program to provide rental subsidies. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|-----------------|---|----------------------------------|--------------------|--------------------------|-------------|---|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| Other | public - state | Acquisition Admin and Planning Homeowner rehab | 35,000,000 | 0 | 0 | 35,000,000 | 35,000,000 | |
| Other | public - state | Acquisition Housing Multifamily rental new construction Multifamily rental rehab | 30,000,000 | 0 | 0 | 30,000,000 | 99,600,000 | State custodial funds used for affordable housing development. |
| Other | public - state | Admin and Planning Multifamily rental new construction Multifamily rental rehab New construction for ownership | 150,000,000 | 0 | 0 | 150,000,000 | 150,000,000 | |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|-----------------|--|----------------------------------|--------------------|--------------------------|------------|---|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| Other | public - state | Admin and Planning Overnight shelter Permanent housing in facilities Rapid re-housing (rental assistance) Rental Assistance Supportive services | 15,300,000 | 0 | 0 | 15,300,000 | 45,900,000 | Colorado revenue from a tax cash fund appropriated specifically to address homelessness. The program is known as the Homeless Solutions Program (HSP). |
| Other | public - state | Housing Multifamily rental new construction | 25,000,000 | 0 | 0 | 25,000,000 | 25,000,000 | |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|-----------------|---------------|----------------------------------|--------------------|--------------------------|-----------|---|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| Other | public - state | Other | 1,875,000 | 0 | 0 | 1,875,000 | 7,500,000 | A portion of the gaming tax revenues that accrue to the state general fund are appropriated to the Local Government Limited Gaming Impact (LGLGI) Fund. The geographic eligibility area for the LGLGI Program includes Gilpin and Teller counties as well as eight contiguous counties: Boulder, Clear Creek, Douglas, El Paso, Fremont, Grand, Jefferson, and Park. In addition, counties that contain tribal lands where limited stakes gaming occurs are also included. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|-----------------|---|----------------------------------|--------------------|--------------------------|------------|---|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| Other | public - state | Public Improvements Public Services Other | 30,000,000 | 0 | 0 | 30,000,000 | 90,000,000 | This competitive grant program assists communities affected by the growth and decline of energy and mineral industries in the state. Funds come from the state severance tax on energy and mineral production and from a portion of the state's share of royalties paid to the federal government for mining and drilling of minerals and mineral fuels on federally owned land.\$5 million of this source is set aside annually for broadband infrastructure. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|-----------------|-------------------|----------------------------------|--------------------|--------------------------|------------|---|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| Other | public - state | Rental Assistance | 57,680,704 | 0 | 0 | 57,680,704 | 173,042,112 | Funds provided by the state for rental assistance vouchers for special populations, including people with disabilities, experiencing homelessness, with mental health disorders, and who are justice-involved. |

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The CDBG program requires dollar-for-dollar matching funds for administrative expenses beyond the first \$100,000. CDBG-funded public facility, infrastructure, and public services projects have no minimum programmatic match requirements, but communities are strongly encouraged to take primary responsibility for resolving their economic development and public facility problems. In specific projects, this may involve making financial commitments, adjusting development regulations, user rates and fees, and capital construction and maintenance programs as well as establishing other funding mechanisms and generally sharing in or leveraging funds and management for development and redevelopment. The State encourages arrangements between and among eligible entities to ensure adequate provision of common or related community development activities and services. Also, municipalities and counties may contract with other entities or parties (Councils of Governments, Regional Planning Districts, Special Districts, Local Development Corporations, Downtown Development Authorities, Urban Renewal Authorities, Housing Authorities, non-profit corporations, etc.) to carry out project activities as provided for under statutes (including 31-51-101(1)(c), 30-11-101(1)(d), 29-1-203 and 29-1-204.5, C.R.S., as amended), ordinances and resolutions, and State and local financial management procedures.

Businesses receiving economic development awards are required to match dollar for dollar minimum for each dollar received. There is no

required match for business loans. Economic Development consideration for new business infrastructure development will participate up to 35% of total project cost and existing business infrastructure requests will be considered for funding up to 55% of total project cost.

The HOME program requires a 25% match on all expenditures other than planning and administration, CHDO operating, CHDO Capacity Building and CHDO predevelopment loans when repayment is waived under §92.301. The Division of Housing achieves its HOME match requirement with eligible local funding used in HOME projects, land donations, foundation funds used in HOME projects, certain state investments, and other HOME eligible match sources. Due to the COVID-19 pandemic, HUD waived the 25% match requirement for Federal Fiscal Years 2020 and 2021, and DOLA advised HUD of its intent to take advantage of this flexibility. DOH also uses state HDG funds to support HOME-eligible activities, though they are not entered into IDIS and thus not counted as match.

The Emergency Solutions Grants program requires a dollar-for-dollar match on all expenditures after the first \$100,000. DOH requires ESG applicants to provide matching contributions in an amount equal to the ESG funds they receive from us. To level the playing field for ESG sub recipients in rural areas or otherwise with limited access to other resources, DOH may also provide state HSP funds to meet match requirements for sub recipients that demonstrate need. All matching contributions must meet ESG requirements. In the event that a sub recipient is unable to meet its matching requirements due to a financial hardship, and state matching funds are unavailable or infeasible, the sub recipient may submit a written request for a waiver, with explanation of amount, nature and cause of the hardship. Following review, DOH applies the \$100,000 match exception for these cases as appropriate.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The General Assembly passed HB19-1319 in 2019. This act compels state agencies and state institutions of higher education to submit a list of all undeveloped real property owned by or under the control of the agency or institution to the capital development committee, which in turn authors a report on this undeveloped land. The Division of Housing is required to link to this report on its website. Though this list may include parcels that are suitable for affordable housing development, state agencies may not dispose of land without legislative approval. However, the State Land Board, which manages land for the purposes of benefiting public education and conservation, has signed long-term land leases with affordable housing developers.

Discussion

DOH coordinates the use of LIHTC funds awarded by the Colorado Housing and Finance Authority (CHFA) through pipeline meetings and throughout the grant underwriting process for each proposed project. DOH accepts applications on a monthly cycle for the types of projects that are LIHTC eligible, accommodating CHFA's funding cycle. The pipeline meetings include members of development staff from DOH, the Colorado Housing and Finance authority (CHFA), regional CDFIs, the City of Denver, USDA Rural Development, and HUD.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|---|------------|----------|---|-----------------|--|--|--|
| 1 | Increase Supply of Affordable Housing | 2020 | 2024 | Affordable Housing Homeless Non-Homeless Special Needs | | | CDBG: \$4,010,438 HOME: \$9,235,009 HTF: \$8,675,879 | Rental units constructed: 375 Household Housing Unit Homeowner Housing Added: 200 Household Housing Unit |
| 2 | Homelessness Prevention and Alleviation | 2020 | 2024 | Homeless | | Housing and Assistance for People Experiencing Home | ESG: \$1,916,077 | Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted Homeless Person Overnight Shelter: 5000 Persons Assisted Homelessness Prevention: 250 Persons Assisted |
| 3 | Preserve Existing Affordable Housing | 2020 | 2024 | Affordable Housing | | Acquisition and Preservation of Affordable Housing Housing Rehabilitation | CDBG: \$6,684,063 HOME: \$4,197,731 HTF: \$2,478,822 | Rental units rehabilitated: 100 Household Housing Unit Homeowner Housing Rehabilitated: 60 Household Housing Unit |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|--|------------|----------|--|-----------------|---|--|---|
| 4 | Improve Public Facilities and Infrastructure | 2020 | 2024 | Non-Housing Community Development | | Public Facilities and Infrastructure | CDBG: \$4,010,438 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15000 Persons Assisted |
| 5 | Improve Housing Affordability | 2020 | 2024 | Affordable Housing | | Affordable Housing Creation Rental Assistance | CDBG: \$4,010,438 HOPWA: \$990,597 HOME: \$839,546 | Direct Financial Assistance to Homebuyers: 40 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 75 Households Assisted |
| 6 | Support Small Business Development | 2020 | 2024 | Non-Housing Community Development | | Economic Development | CDBG: \$4,010,438 | Jobs created/retained: 100 Jobs |
| 7 | Affirmatively Furthering Fair Housing | 2020 | 2024 | Affordable Housing Public Housing Homeless | | Affirmatively Furthering Fair Housing Public Services Housing Non-Profit Capacity Building | | |
| 8 | Build Housing Non-Profit Capacity | 2020 | 2024 | Affordable Housing | | | HOME: \$839,546 | Other: 8 Other |
| 9 | Expand Public Services | 2020 | 2024 | Homeless Non-Housing Community Development | | Public Services | CDBG: \$1,336,813 | Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted |

Table 6 – Goals Summary

Goal Descriptions

| | | |
|---|-------------------------|--|
| 1 | Goal Name | Increase Supply of Affordable Housing |
| | Goal Description | |
| 2 | Goal Name | Homelessness Prevention and Alleviation |
| | Goal Description | |
| 3 | Goal Name | Preserve Existing Affordable Housing |
| | Goal Description | |
| 4 | Goal Name | Improve Public Facilities and Infrastructure |
| | Goal Description | |
| 5 | Goal Name | Improve Housing Affordability |
| | Goal Description | |
| 6 | Goal Name | Support Small Business Development |
| | Goal Description | |
| 7 | Goal Name | Affirmatively Furthering Fair Housing |
| | Goal Description | Make one grant to support AFFH. |
| 8 | Goal Name | Build Housing Non-Profit Capacity |
| | Goal Description | Make 4 grants to CHDOs. |
| 9 | Goal Name | Expand Public Services |
| | Goal Description | |

AP-25 Allocation Priorities – 91.320(d)

Introduction:

The break down below is an estimate of the percentage of each type of funding that will go into achieving each. The percentages will not necessarily reflect the relative priority of each goal, since the costs involved for each type of project vary. The funding allocation for state funds and other resources managed by entities other than the Department of Local Affairs are rough estimates.

Funding Allocation Priorities

| | Increase Supply of Affordable Housing (%) | Homelessness Prevention and Alleviation (%) | Preserve Existing Affordable Housing (%) | Improve Public Facilities and Infrastructure (%) | Improve Housing Affordability (%) | Support Small Business Development (%) | Affirmatively Furthering Fair Housing (%) | Build Housing Non-Profit Capacity (%) | Expand Public Services (%) | Total (%) |
|--------------------------|---|---|--|--|-----------------------------------|--|---|---------------------------------------|----------------------------|-----------|
| CDBG | 15 | 0 | 25 | 15 | 15 | 15 | 0 | 0 | 5 | 90 |
| HOME | 55 | 0 | 25 | 0 | 5 | 0 | 0 | 5 | 0 | 90 |
| HOPWA | 0 | 0 | 0 | 0 | 90 | 0 | 0 | 0 | 0 | 90 |
| ESG | 0 | 90 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 90 |
| HTF | 70 | 0 | 20 | 0 | 0 | 0 | 0 | 0 | 0 | 90 |
| Continuum of Care | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| General Fund | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Section 811 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Tax Exempt Bond Proceeds | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other 4% LIHTC | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other 9% LIHTC | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

| | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|
| Other Colorado Homeless Contribution Income Tax Credit | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other Colorado Housing Investment Fund | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other Connecting Coloradans Experiencing Homelessness with Services, Recovery Care, and Housing Supports G | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other Denver Metropolitan Regional Navigation Campus Grant | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other Energy/Mineral Impact Assistance Fund | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other Gaming Taxes | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other Homeless Solutions Program | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

| | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|
| Other Housing Choice Voucher Program | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other Infrastructure and Strong Communities Grant Program | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other Local Investments in Transformational Affordable Housing Program | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other Middle Income Access Program Expansion | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other Mobile Home Park Resident Empowerment Loan Program | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other NSP1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other State Affordable Housing Credit | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Other State Rental Assistance | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

| | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|
| Other Transformational Affordable Housing Revolving Loan Fund Program | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|--|---|---|---|---|---|---|---|---|---|---|

Table 7 – Funding Allocation Priorities

Reason for Allocation Priorities

DOLA allocates funds from the various sources to address priority needs and achieve stated goals, within the constraints of the eligible uses of each funding source. The percentages above are estimates based on historic use of funds.

How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

DOLA’s top priorities are addressing homelessness and increasing and preserving the supply of affordable housing. Like much of the nation, Colorado is experiencing ongoing housing and homelessness crises, and the state dedicates significant resources to these issues. All of DOLA’s ESG, Continuum of Care, and state Homeless Solutions Program funds are targeted to ending homelessness and building capacity among homeless service providers statewide. The state created a state-funded housing voucher program for specific subpopulations of people at risk of or experiencing homelessness, and DOH awards project-based HCV vouchers for supportive housing. DOLA also dedicates significant state and federal funding to Increase, improve, and preserve the affordable housing supply. When invested in housing development and preservation projects, these funds are leveraged, typically at least 10 or 15 to 1, with other sources to maximize their impact.

Additionally, supporting small businesses and local governments remain critical goals, particularly as a result of the COVID-19 pandemic. The implications and fallout of the global pandemic are not yet fully understood, but DOLA anticipates that local governments and businesses will require state support and technical assistance to recover from the economic shock caused by the crisis. Support to businesses and local governments is a critical component of DOLA’s mission.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

Within the Colorado Department of Local Affairs, the Division of Housing administers the State of Colorado's allocation of HOME Investment Partnership (HOME), National Housing Trust Fund (HTF), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) funds, while the Division of Local Government is the lead agency administering Community Development Block Grant (CDBG) funds.

The Department of Local Affairs splits its annual allocation of Non-Entitlement CDBG funds into 3 equal buckets (once administrative funds are subtracted) for housing, community development, and economic development. The Division of Housing administers housing funds, the Division of Local Government administers community development funds, and the Governor's Office of Economic Development and International Trade administers economic development funds. Generally, if there are available funds in any one bucket after a reasonable length of time, and there is a high demand in another area, these funds may be re-assigned in order to address the demands of the local communities. Each administering agency distributes CDBG funds a bit differently, but all use an application and review process.

Distribution Methods

Table 8 - Distribution Methods by State Program

| | | |
|----------|--|---|
| 1 | State Program Name: | Community Housing Development Organization Operating Grants and Predevelopment Loans |
| | Funding Sources: | HOME |
| | Describe the state program addressed by the Method of Distribution. | Eligible Community Housing Development Organizations (CHDOs) apply to the Division of Housing (DOH) once a year on September 1st for operating funds. Applications for pre-development loans are taken anytime during the year. Colorado DOH Development Specialists review and underwrite these requests and simultaneously review documentation submitted to re-certify the agency as a CHDO. |

| | |
|--|---|
| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>Agencies provide copies of their articles, bylaws, Board of Directors names and sectors represented, staff bios, business plans, financial documentation, letters of local funding match (for entitlement areas), and project plans, which for Operating applications must demonstrate a reasonable expectation that they will begin development on CHDO-eligible projects within 24 months. Developers and Asset Managers evaluate each CHDO's performance and progress on projects planned for development associated with earlier CHDO awards..</p> |
| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>Not Applicable</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>Not Applicable</p> |

| | |
|---|--|
| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>Not Applicable</p> |
| <p>Describe how resources will be allocated among funding categories.</p> | <p>If sufficient funds are available, CHDO operating funds are generally awarded to all agencies meeting the threshold requirements, and demonstrating need and capacity to complete projects identified in their project plans. Agencies in rural areas with limited available resources for local contributions receive priority.</p> |
| <p>Describe threshold factors and grant size limits.</p> | <p>For existing CHDOs, successful completion of previously identified projects is required to receive an award of operating funds. A project plan identifying intended development or acquisition activities is also required. Grants are generally \$20,000-\$50,000 per agency, and DOH verifies that if local PJ CHDO operating funds are provided, the combined awards do not exceed the applicable threshold at 24 CFR 92.300(f).</p> |

| | | |
|---|--|---|
| | What are the outcome measures expected as a result of the method of distribution? | DOH expects all CHDOs receiving operating funds to initiate CHDO-eligible projects within the required timeframe and add affordable units to the statewide inventory. |
| 2 | State Program Name: | Economic Development |
| | Funding Sources: | CDBG |
| | Describe the state program addressed by the Method of Distribution. | The economic development use of CDBG funds is administered by the Governor's Office of Economic Development and International Trade (OEDIT) and the Department of Local Affairs/Division of Local Government (DOLA/DLG), and receives a one-third share of Colorado's annual non-entitlement CDBG allocation. OEDIT/DOLA accepts and considers business development proposals that provide financial assistance to private for-profit and non-profit businesses (except for financing for community development proposals) on a continuous basis. Such proposals include those that would provide funding through local or regional loan funds, infrastructure to benefit specific businesses, and feasibility/planning studies to benefit specific businesses. |

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Final funding decisions are made by the Governor's Financial Review Committee and applications are considered on a continual basis until all funds are awarded. Because housing, public facility and economic development projects are administered by separate divisions, the application review and award process is different for all. However, all CDBG applications are reviewed for the following: Applicant Eligibility, Eligible Activity, National Objective Eligibility, Priority within the Consolidated Plan, the project's benefit to low and moderate income persons or households, Demonstrated Need, Project Implementation and Sustainability, number and economic status of individuals affected by the need, Level of Urgency, project's Readiness to Go, and Management Capacity.

Other review criteria include:

- Consistency with local development strategies and coordination with other activities;
- Public and Private Commitments; value and the viability of those commitments; Level of local commitment; communities are strongly encouraged to take primary responsibility for resolving their public facilities problems. In specific projects, this may involve making financial commitments; adjusting development regulations, user rates and fees, and capital construction and maintenance programs; creating improvement districts; establishing development and redevelopment authorities; and generally sharing in or leveraging funds and management for development and redevelopment
- Management Capability - the ability of the local government submitting the proposal to administer the project as described either through their own staff or contractors.
- Budget - DOLA staff will compare administrative and other costs with those of other similar proposals. Are the proposed administration and overall project budgets adequate, reasonable and realistic given the project work plan?
- Statutory and Regulatory Compliance - Does the proposed project involve or result in residential displacement? Is there a plan to replace all low/moderate income housing demolished or converted, and to assist persons being relocated? Does the proposed project involve real property acquisition or relocation of any persons or businesses? Does it trigger Uniform Relocation Act requirements? Are cost and time requirement estimates reasonable? Are estimated labor wage costs reasonable? Is the project subject to Davis-Bacon prevailing wage requirements? Is the proposed project in a floodplain or geological hazard area, or does it affect cultural or historic resources? Are there other environmental considerations?

| | |
|--|---|
| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>Additional information can be accessed through the website and Colorado's CDBG Guidebook also posted on the web.</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>Not Applicable</p> |
| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>Not Applicable</p> |

| | |
|--|--|
| <p>Describe how resources will be allocated among funding categories.</p> | <p>Colorado Governor's Office of Economic Development and International Trade (OEDIT) accepts and considers business development proposals that involve providing financial assistance to private for-profit and non-profit businesses (except for financing for community development proposals) on a continuous basis. Such proposals include:</p> <ul style="list-style-type: none"> - Funding through local or regional loan funds - Infrastructure to benefit specific businesses and - Feasibility/planning studies to benefit specific businesses. |
| <p>Describe threshold factors and grant size limits.</p> | <p>There are no minimum or maximum grant size limits for economic development.</p> |

| | | |
|---|---|--|
| | What are the outcome measures expected as a result of the method of distribution? | To the extent that CDBG funds are allocated and available, Colorado's rural local government priorities will be addressed, particularly those with low to moderate income populations. This method of distribution will provide economic opportunity to help create sustainable communities, and the measures of success are jobs created and retained. |
| 3 | State Program Name: | Emergency Solutions Grants |
| | Funding Sources: | ESG |
| | Describe the state program addressed by the Method of Distribution. | Emergency Solutions Grants (ESG) funds provide grants by formula to States, metropolitan cities, urban counties and U.S. territories for eligible activities. The funds can be used to provide a wide range of services and supports under the five program components: street outreach, emergency shelter, rapid rehousing, homelessness prevention, and HMIS. |
| | Describe all of the criteria that will be used to select applications and the relative importance of these criteria. | The criteria used to select applications and the relative importance of these criteria can be found on the scoring sheets used as our method of distribution for this program. The questions listed on the scoring sheet include, but are not limited to location, match requirement, existing agency's reporting history, application content, agency capacity, and HUD performance standards and outcomes. |

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| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>Not Applicable</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>The Division of Housing publishes a solicitation for ESG funding applications once per year on the Division of Housing website to make its allocation available. The Division of Housing (DOH) is preparing to publish its 2022-2023 funding availability prior to Action Plan approval to accommodate the requirement at 24 CFR 576.203(a). Funds are awarded to sub recipients using the scoring sheet system described above, followed by a review and recommendation of the Homeless Program Specialist team, ESG Program Manager, Director of the Office of Homeless Initiatives, Housing Director and other relevant state offices. Many of the applicants are continuing programs and agencies whom the Division of Housing has worked with in previous years, and they may be able to complete an abbreviated application process.</p> |
| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>Not Applicable</p> |

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| <p>Describe how resources will be allocated among funding categories.</p> | <p>The five funding categories used to allocate resources are street outreach, emergency shelter, rapid rehousing, homelessness prevention, and HMIS. Each of the five categories have corresponding ESG activities and eligible costs provided by the U.S. Department of Housing and Urban Development. Resources are allocated among funding categories using the ESG program regulations, eligible costs, and program requirements.</p> |
| <p>Describe threshold factors and grant size limits.</p> | <p>The exact funding amount provided for ESG varies each year. Once an amount is allocated to DOLA, the number and amount of grants to be awarded is determined. There is not a grant size limit, however the average grant size is approximately \$25,000 per grantee for shelters, and \$250,000 for homeless prevention and rapid re-housing. DOLA adjusts the threshold factors and grant size limits based on the number of returning and new applications received each year compared to the funding provided.</p> |
| <p>What are the outcome measures expected as a result of the method of distribution?</p> | <p>Emergency Solutions Grant funds used to support emergency shelters create available suitable living environments for people experiencing homelessness either in emergency shelters or in unsheltered situations; those used for homelessness prevention help to provide affordability for decent affordable housing; funds used for rapid re-housing make decent affordable housing available or accessible.</p> |

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| 4 | State Program Name: | Homeownership Down Payment Assistance/Equity Sharing |
| | Funding Sources: | CDBG HOME |
| | Describe the state program addressed by the Method of Distribution. | <p>Funded with HOME or CDBG, DOH provides grant funds to regional housing organizations to provide down payment assistance loans to low and moderate-income families. These loans are set at a low interest rate and can be amortized or deferred depending upon the need of the family. When loan repayment is received, the housing agency places the payment into a revolving loan fund. The primary goals of the down payment assistance program are to:</p> <ul style="list-style-type: none"> - Provide opportunities for low and moderate-income Coloradans to purchase their own homes; - Increase the number of homeowners in the regional housing organization's service area; - Create and maintain regional revolving loan funds to assist future families with Down Payment Assistance; - Foster equity for historically disadvantaged populations; - Enhance neighborhoods and communities; and, - Provide stability for families and reduce foreclosure rates by requiring pre-homeownership counseling. <p>Annual follow-up with families is highly recommended.</p> |

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| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>Applications are accepted once per year. Review criteria may include, but are not limited to the following:</p> <ul style="list-style-type: none"> - The need and demand for the program, including an evaluation of program income balances; - Program sustainability; - Financial, administrative, and management capacity of the applicant; - Geographic coverage; - Applicant's past performance as a state sub recipient; - Application threshold criteria; - Administrative fees; - Cost effectiveness; - Cost containment; - Cost ranges. <p>Regional field and program staff review each application and determine a recommended level of funding based on the criteria above. The Housing Development Specialist is responsible for underwriting the program to assess the need for funding. The Development Specialist prepares a project review document for each submitted application. The review document is designed to provide information in an objective format to assist staff and the State Housing Board with funding recommendations. The Executive Director of the Department of Local Affairs reviews the State Housing Board's funding recommendations, conducts any follow-up necessary, and makes final approvals of funding awards on the state's behalf. DOH accepts applications once a year for this competitive application cycle that allows for the direct comparison of programs.</p> |
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| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>All potential applicants are able to access application instructions, CDBG guidebook, and other state publications describing the application criteria on the Division of Housing website: www.DOLA.Colorado.Gov.</p> <p>In addition, the Revolving Loan Fund Program Guidelines and Program Income Guidelines can be found on the Division of Housing website: www.Colorado.gov/DOLA/DOH.</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>Not Applicable</p> |
| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>Not Applicable</p> |

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| <p>Describe how resources will be allocated among funding categories.</p> | <p>Revolving Loan Fund income or recycled HOME or CDBG program income is held at the sub recipient level and supports additional down payment assistance loans. Additional information is available in the Revolving Loan Fund Program Guidelines on the Division of Housing website (linked above).</p> <p>Recommendations on resource allocation among funding categories are determined following the application criteria reviews described above. Recommendations range from full funding, low to high partial funding, or no funding based on underwriting. DOH determines which funding source is appropriate for each program based on eligibility requirements, minimizing administrative burden, and availability of funds.</p> |
| <p>Describe threshold factors and grant size limits.</p> | <p>Threshold criteria include demonstration of demand/need, sub recipient capacity, and program feasibility. There is no specific grant limit; DOH staff assess and balance the need among all competing priorities each year to foster the highest and best use of funds.</p> |

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| | What are the outcome measures expected as a result of the method of distribution? | The outcomes for homebuyer acquisition programs are improved housing affordability and expanded opportunity for upward mobility for low-income households. Measures of success include homeowners assisted and an analysis of equitable access to the program across all demographic groups in each community. |
| 5 | State Program Name: | Housing Opportunities for Persons with AIDS (HOPWA) |
| | Funding Sources: | HOPWA |
| | Describe the state program addressed by the Method of Distribution. | The resources of the HOPWA program are granted to Colorado AIDS Project (CAP), an umbrella organization that serves the balance of state outside the Denver Metro Area. CAP distributes funds through its regional offices: Southern Colorado AIDS Project, Western Colorado AIDS Project and Northern Colorado AIDS Project. CAP also enters into a memorandum of understanding with Boulder County AIDS Project to provide tenant-based rental assistance and supportive services in Boulder County. Funds are allocated on the basis of the number of people living with HIV/AIDS in each catchment area as well as the ability to use the funds timely. |

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| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>The critical criterion is the ability of the organization to effectively fund and provide services to people living with HIV/AIDS throughout the balance of state. Only one organization, Colorado AIDS Project, has this capacity.</p> |
| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>Not Applicable</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>Not Applicable</p> |

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| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>The Balance of State HOPWA program was designed in partnership with the Colorado AIDS project, and there are no other organizations in the state capable of providing the same level of specialized services for people living with HIV/AIDS. CAP is a grassroots, community-based organization for serving people living with HIV/AIDS that existed prior to the creation of the HOPWA program. It is not, however, faith based.</p> |
| <p>Describe how resources will be allocated among funding categories.</p> | <p>As required by 24 CFR 574.300, 3% of the grant is allocated to the State's administrative costs; the remaining funds are granted to the Colorado AIDS Project. Under the regulations they may use up to 7% of the amount they receive for administrative costs. Remaining funds are distributed between rental assistance and supportive services and each regional office receives an amount proportional to the number of people living with HIV/AIDS in their service area with consideration to their ability to use the funds in a timely manner.</p> |
| <p>Describe threshold factors and grant size limits.</p> | <p>The grant size is limited by the amount of funding available under each annual HOPWA allocation.</p> |

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| | What are the outcome measures expected as a result of the method of distribution? | Decent affordable housing and supportive housing services will be made available/accessible to low-income persons living with HIV/AIDs in the State of Colorado outside of the Denver Metro Eligible Metropolitan Statistical Area (EMSA). |
| 6 | State Program Name: | Housing Trust Fund Program |
| | Funding Sources: | HTF |
| | Describe the state program addressed by the Method of Distribution. | The Housing Trust Fund (HTF) is an affordable housing production program that compliments existing Federal, state and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low- and very low-income households, including those experiencing homelessness. |

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| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>Threshold:</p> <ul style="list-style-type: none"> - Applicant’s ability to obligate HTF funds - Applicant's ability to undertake eligible activities in a timely manner - Creation or preservation of permanent rental housing <p>The first and second funding priorities are given to applications that meet the State’s priority housing needs by:</p> <ol style="list-style-type: none"> 1) providing affordable, community-based supportive housing for people with disabilities or other special needs (“Supportive Housing”); or 2) including 30% AMI units in mixed-income developments that would be infeasible at 30% AMI rents but for the HTF funding. <p>The Supportive Housing priority (#1) aligns with Colorado’s Priority Need for “Housing and Assistance for People Experiencing Homelessness.” Supportive Housing projects should include Federal, State, or local project-based rental assistance to ensure the rents for HTF-assisted units are affordable to extremely low-income families. The 30% AMI units in mixed-income developments priority (#2) aligns with Colorado’s Priority Needs of “Affordable Housing Stock” and “Acquisition and Preservation of Affordable Housing Stock.”</p> <p>The third funding priority is leverage. Colorado will consider the extent to which each application includes non-Federal funding sources and local resources and/or concessions. Those with greater local/non-Federal commitment, when resources are available, will receive funding priority.</p> <p>The fourth funding priority is based on the duration of the affordability period. All HTF units in rental housing projects are required to remain affordable as HTF units for a minimum of 30 years. Projects for which the underwriting supports financial feasibility beyond the minimum period, and for which the owner is willing to commit to a longer affordability period, will receive funding priority.</p> <p>The fifth funding priority will be for applications that contribute to Geographic Diversity (IDIS Con Plan and Action Plan SP-10). Under this criterion, priority for funding will be given to applications for projects that affirmatively further Fair Housing and/or are located in rural areas.</p> |
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| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>Not Applicable.</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>Not Applicable.</p> |
| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>Not Applicable.</p> |

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| <p>Describe how resources will be allocated among funding categories.</p> | <p>Recommendations on how resources will be allocated among funding categories are determined following the application reviews described above. An underwriting process reviews whether the program is feasible and necessary based on the type, location, and ability of the agency to carry out its proposal. Recommendations range from full funding, low to high partial funding, or no funding based on underwriting. Division of Housing determines which funding will be used for each project and program by following HUD and funding source regulations, and by availability of funds.</p> |
| <p>Describe threshold factors and grant size limits.</p> | <p>DOH has opted to adopt the HOME subsidy limits by bedroom size for the HTF program. DOH uses the following criteria to evaluate each application: The cost ranges are a benchmark to assess whether a project is being built to modest standards or whether there are site conditions, market standards, or design considerations that necessitate higher or lower development costs. All development criteria that fall outside of the parameters of the various ranges must be explained.</p> |
| <p>What are the outcome measures expected as a result of the method of distribution?</p> | <p>The outcome measures expected as a result of the method of distribution is increased affordable housing and prevention/alleviation of homelessness. All of the funds will be used to serve extremely low-income households.</p> |

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| 7 | State Program Name: | Public Facilities and Infrastructure |
| | Funding Sources: | CDBG |
| | Describe the state program addressed by the Method of Distribution. | This state program funds improvements in public infrastructure, such as water and sewer or drainage systems, and public facilities like day care centers or food banks |

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| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>Final funding decisions are made by the Executive Director of the Colorado Department of Local Affairs with input from the Division of Local Government management and regional staff. All CDBG applications are reviewed for the following: Applicant Eligibility, Eligible Activity, National Objective, Priority within the Consolidated Plan, the project's benefit to low and moderate income persons or households, Demonstrated Need, Project Implementation and Sustainability, number and economic status of individuals affected by the need, Level of Urgency, Project's Readiness to Go, State of Colorado Priorities, and Management Capacity.</p> <p>Other review criteria include:</p> <ul style="list-style-type: none"> - Consistency with local development strategies and coordination with other activities; - Public and Private Commitments; value and the viability of those commitments; - Level of local commitment; communities are strongly encouraged to take primary responsibility for resolving their public facilities problems. In specific projects, this may involve making financial commitments; adjusting development regulations, user rates and fees, and capital construction and maintenance programs; creating improvement districts; establishing development and redevelopment authorities; and generally sharing in or leveraging funds and management for development and redevelopment - Management Capability - the ability of the local government submitting the proposal to administer the project as described either through their own staff or contractors. - Budget - DLG staff will compare administrative and other costs with those of other similar proposals. Are the proposed administration and overall project budgets adequate, reasonable and realistic given the project work plan? - Statutory and Regulatory Compliance - Does the proposed project involve or result in residential displacement? Is there a plan to replace all low/moderate income housing demolished or converted, and to assist persons being relocated? Does the proposed project involve real property acquisition or relocation of any persons or businesses? Does it trigger Uniform Relocation Act requirements? Are cost and time requirement estimates reasonable? Are estimated labor wage costs reasonable? Is the project subject to Davis-Bacon prevailing wage requirements? Is the proposed project in a floodplain or geological hazard area, or does it affect cultural or historic resources? Are there other environmental considerations? |
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| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>The State will continue a coordinated technical assistance program to assist communities with CDBG project management and project formulation and planning, particularly in coordination with State programs such as Impact grants, housing grants and loans, and economic development funds. The State will provide special project management technical assistance to communities that have never administered a CDBG grant, and to those that have experienced or are experiencing difficulty in administering a CDBG grant. Project formulation and planning assistance will be provided to communities that need more long-term technical assistance to prepare for CDBG or other State funding in the future, and that have committed to undertake overall development and maintenance planning and budgeting efforts.</p> <p>To provide consistent guidance to CDBG recipients, the Department of Local Affairs has a CDBG staff specialist. State technical assistance may be in the form of personal contact with local government officials and staff, workshops, brokering assistance from private or local public sources, and documents and materials. Staff members have prepared a CDBG Guidebook that is available online at the website of the Division of Local Government. The Guidebook contains information on Project Start-up, Financial Management, Reporting, Environmental Review, Civil Rights, Acquisition, Relocation, Labor and Construction, Project Close-Out, and Monitoring. All sections are available in PDF or Word format. DOLA also provides this Guidebook to grantees in hard copy at the time of award upon request.</p> |
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| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>Not Applicable</p> |
| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>Not Applicable</p> |
| <p>Describe how resources will be allocated among funding categories.</p> | <p>For public facilities or community development projects, there is no breakdown among funding categories. Funding is subject to local government applications and eligibility requirements.</p> |

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| | <p>Describe threshold factors and grant size limits.</p> | <p>DOLA sets \$600,000 as the typical maximum grant amount for public facility or community development projects, however, if a local government demonstrates a significant health and/or safety need and is unable to find other funding, the department may waive this maximum. Applications are reviewed through funding cycles and made known through state associations. Typically, there is only one cycle per year. Additional cycles may be announced if sufficient funds remain.</p> |
| | <p>What are the outcome measures expected as a result of the method of distribution?</p> | <p>To the extent that CDBG funds are allocated and available, Colorado's rural local government priorities will be addressed, particularly those with low to moderate income populations.</p> |
| <p>8</p> | <p>State Program Name:</p> | <p>Public Services</p> |
| | <p>Funding Sources:</p> | <p>CDBG</p> |
| | <p>Describe the state program addressed by the Method of Distribution.</p> | <p>Community Development Block Grant (CDBG) funds may support expanded public services for low-income residents of non-entitlement communities.</p> |

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| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>Due to the limited nature of public services funds, the application process is highly selective. Selection criteria include, but are not limited to, number of low to moderate income persons to be served, clear articulation of target population and services to be offered, demonstration of need, administrative capacity of the applicant, capacity to deliver the service, demonstrated partnership with a non-profit service provider (if the local government will not provide the service directly), application completeness, quality of budget, readiness to proceed, and local contributions, whether financial or in-kind.</p> |
| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>All potential applicants are able to access application instructions, CDBG guidebook, and other state publications describing the application criteria on the Division of Local Government website: www.Colorado.gov/DOLA.</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>Not applicable</p> |

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| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>Not applicable</p> |
| <p>Describe how resources will be allocated among funding categories.</p> | <p>DOLA anticipates a high level of need for public services for people experiencing or transitioning from homelessness, and other community service needs and expects the majority of public services funds will be allocated to these projects.</p> <p>Additionally, when the 15% Public Services cap is re-instituted (currently anticipated with the FY2021 allocation), because both the Division of Housing and the Division of Local Government intend to fund Public Services, the two divisions will coordinate awards to ensure DOLA does not exceed the cap.</p> |
| <p>Describe threshold factors and grant size limits.</p> | <p>Threshold factors are: demonstration of need, capacity to comply with CDBG requirements, capacity to provide high quality services to the target populations. There is no maximum grant award, however, DOH and DLG will evaluate whether funds requested are reasonable and likely to be fully expended.</p> |

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| | What are the outcome measures expected as a result of the method of distribution? | The anticipated outcome is expanded public services in communities without many resources to offer them, and stabilization of vulnerable residents of nonentitlement communities. Outcomes are measured by people served. |
| 9 | State Program Name: | Single and Multi Family Affordable Housing Development and Disaster Recovery Housing Rehabilitation |
| | Funding Sources: | CDBG HOME |

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| <p>Describe the state program addressed by the Method of Distribution.</p> | <p>DOH uses Federal and State funds to assist in financing housing development projects and programs. Community Development Block Grant (CDBG) funds are for use in non-entitlement areas only. HOME Investment Partnerships Program (HOME) funds may be used throughout the state.</p> <p>DOH structures awards as grants or loans. DOH underwrites each project to assess the need for gap funds and whether a project can support debt. Generally, non-profit organizations and housing authorities receive grants and for-profit entities receive loans.</p> <p>Disaster Recovery Housing Rehabilitation/Reconstruction: Also included under this method of distribution is owner-occupied rehabilitation and reconstruction (replacement where applicable) of housing damaged or destroyed in disasters. CDBG funds are used by local governments and nonprofit partners to assist in filling the gap and supplementing in rehabilitation/reconstruction of impacted homes, after exhausting other disaster assistance/recovery sources. Funds may be loaned or granted as determined applicable on a per-disaster basis. CDBG funds used for recovery rehabilitation and reconstruction are not placed in revolving loan funds; rather repaid funds are returned to the state or the state's administrator to be reprogrammed into other CDBG eligible activities, which may include subsequent disaster recovery housing programs. These Disaster Recovery Housing Rehabilitation/Reconstruction CDBG funds will not be used for the new construction of multifamily housing or other ineligible activities.</p> <p>HUD has approved a waiver of certain regulatory requirements for affordable housing activities undertaken with CDBG in Boulder County that specifically address damage in the area that received the major disaster declaration FM-5423-CO for the Colorado Marshall Fire. This waiver is included as an attachment in section AD-26 of this plan and will be leveraged in this method of distribution in order to carry out CBDG activities through state employees, procurement contracts, or assistance provided under agreements with subrecipients, consistent with the entitlement CDBG regulation at 24 C.F.R. § 570.200(f). All actions taken by the State of Colorado to directly administer CDBG funds for this specific purpose will be narrowly targeted for allowable CDBG housing activities in the referenced disaster area, and are subject to other restrictions detailed in the attached waiver.</p> |
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| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>Due to limited DOH funds, the application process is highly selective. There are several criteria used for selection and a full list of criteria can be found on the DOH website in the Development Application Instructions. These criteria include, but are not limited to, the need of affordable housing in the area, administrative capacity of the applicant, application completeness, a variety of cost ranges for the project, project feasibility, project readiness to proceed, project affordability/affordability period, local contributions, the need for gap funding.</p> <p>Disaster Recovery Housing Rehabilitation/Reconstruction: The same application acceptance and review process is employed for disaster recovery purposes.</p> |
| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>CDOH has published the Application Instructions and Development Application which are available on the CDOH website.</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>Not Applicable</p> |

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| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>Not Applicable</p> |
| <p>Describe how resources will be allocated among funding categories.</p> | <p>Funding is distributed to eligible activities, and will fund the new construction, acquisition and rehabilitation, rehabilitation alone, or acquisition alone of single-family and multi-family affordable housing based on applications submitted to the Division of Housing.</p> <p>Funds are not prioritized for any particular type of tenure or activity.</p> |
| <p>Describe threshold factors and grant size limits.</p> | <p>Threshold factors and grant size limits may be found on the Development Application Instructions on the website of the Division of Housing.</p> |

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| | What are the outcome measures expected as a result of the method of distribution? | The outcome of these programs is expected to be improved affordability of decent housing. |
| 10 | State Program Name: | Single-Family Owner-Occupied Rehabilitation/Home Modification |
| | Funding Sources: | CDBG HOME |

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| <p>Describe the state program addressed by the Method of Distribution.</p> | <p>Single-Family Owner-Occupied Rehabilitation (SFOO): Division of Housing (DOH) provides grant funds to regional housing organizations throughout the state to provide SFOO Housing Rehabilitation or emergency repair loans to low and moderate-income families. Similar to the Down Payment Assistance Program, these loans are set at a low interest rate and can be amortized or deferred depending upon the need of the family. When loan repayment is received, the housing agency places the payment into a revolving loan fund. These funds are then recycled back into the community to provide additional housing rehabilitation. The primary goals of the SFOO Rehab program are to:</p> <ul style="list-style-type: none"> - Preserve, enhance, and maintain affordable housing stock through repair and renovation within the community; - Protect the health and safety of the occupants through the correction of housing hazards; - Assist homeowners in improving the condition of their homes; - Allow homeowners to stay in their homes and not be forced to move due to a lack of accessibility; - Assist homeowners to improve their homes energy efficiency; - Create and maintain regional revolving loan funds to assist with future housing rehabilitation projects; and - Develop and sustain a network of local contractors to complete housing repairs and renovations. |
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| <p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> | <p>Applications are accepted once per year. Review criteria may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> - The need for the program; - Program sustainability; - Financial, administrative, and management capacity of the applicant; - Geographic coverage; - Applicant's past performance as a grantee of the state; - Application thresholds; - Administrative fees; - Cost effectiveness; - Cost containment guidance; - Cost ranges. <p>Regional field and program staff review each application and reach a consensus on a recommended level of funding based on underwriting. The Housing Development Specialist is responsible for underwriting the program to assess the need for funding. The Development Specialist prepares a Pro/Con document for each submitted application. The Pro/Con is designed to provide information in an objective format to assist staff and the State Housing Board in making a funding recommendation. The staff forwards the results of its review to the Executive Director of the Department of Local Affairs, who may consult with the State Housing Board or other advisory groups on the proposal. The Division of Housing accepts applications once a year for the competitive application cycle that allows for the direct comparison of programs to ensure funding goes to the projects with the best merits.</p> |
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| <p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p> | <p>All potential applicants are able to access application instructions, CDBG guidebook, and other state publications describing the application criteria on the Division of Housing website: www.Colorado.gov/DOLA.</p> |
| <p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p> | <p>Not Applicable</p> |
| <p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p> | <p>Not Applicable</p> |

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| <p>Describe how resources will be allocated among funding categories.</p> | <p>Recommendations on how resources will be allocated among funding categories are determined following the application reviews described above. An underwriting process reviews whether the program is feasible and necessary based on the type, location, and ability of the agency to carryout its proposal. Recommendations range from full funding, low to high partial funding, or no funding based on underwriting. Division of Housing determines which funding will be used for each project and program by following HUD and funding source regulations, and by availability of funds.</p> |
| <p>Describe threshold factors and grant size limits.</p> | <p>Each proposed RLF program is evaluated using the Division of Housing evaluation criteria which are detailed in its application instructions.</p> |
| <p>What are the outcome measures expected as a result of the method of distribution?</p> | <p>The outcome of these homeownership programs is expected to be improved availability/accessibility of decent affordable housing that meets the needs of its occupants.</p> |

Discussion:

AP-35 Projects – (Optional)

Introduction:

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Table 9 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Rental New Construction is a top priority due to the high rents in most parts of Colorado. Supportive Housing is a sub-category of affordable housing designed to meet the needs of Colorado’s most vulnerable citizens. Single-family owner-occupied rehab, rental rehabilitation and rental acquisition and rehabilitation all support the need to preserve existing affordable housing. Tenant based rental assistance and homeownership assistance are both programs for making existing housing more affordable to individual households.

Economic Development remains critical as job creation is essential to addressing poverty, and is especially important to support and aid in the resilience of families economically impacted by the Coronavirus pandemic. Local governments are also heavily impacted by the pandemic, and will have a greater need for support of public facilities and infrastructure projects in the pipeline. DOLA anticipates they may also require support to adapt to the new normal, and may need to modify public facilities, for instance, to accommodate social distancing and sanitation guidelines.

Finally, rural communities need support delivering public services to their residents, particularly for elderly, people with disabilities, people experiencing homelessness, and other special needs populations. There are limited other resources available to fund services.

AP-38 Project Summary
Project Summary Information

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No

Available Grant Amounts

Acceptance process of applications

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

Yes

State’s Process and Criteria for approving local government revitalization strategies

Yes; however these projects typically are not funded with the regular CDBG program.

AP-50 Geographic Distribution – 91.320(f)

Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

The State of Colorado directs funds to eligible projects and programs for which it receives applications throughout the state. All areas of the state are eligible to receive HOME, HTF, and ESG funds. HOPWA and CDBG funds are limited to jurisdictions that do not receive direct allocations from HUD.

Geographic Distribution

| Target Area | Percentage of Funds |
|--------------------|----------------------------|
| | |

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The State of Colorado does not allocate funds on a geographic basis.

Discussion

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

| One Year Goals for the Number of Households to be Supported | |
|---|-----|
| Homeless | 100 |
| Non-Homeless | 775 |
| Special-Needs | 75 |
| Total | 950 |

Table 11 - One Year Goals for Affordable Housing by Support Requirement

| One Year Goals for the Number of Households Supported Through | |
|---|-----|
| Rental Assistance | 175 |
| The Production of New Units | 575 |
| Rehab of Existing Units | 160 |
| Acquisition of Existing Units | 40 |
| Total | 950 |

Table 12 - One Year Goals for Affordable Housing by Support Type

Discussion:

These are all rough estimates. Actual numbers will depend on the projects submitted and awarded DOLA funding. The goal for households supported for people experiencing homelessness and persons with special needs through affordable housing is a conservative figure as they are estimated based on the the ESG and HOPWA programs specifically as these programs target these populations specifically.

As such it does not include persons experiencing homelessness or with special needs that are incidentally served by the HOME, HTF, and CDBG programs, even though those populations are not the focus of those programs. Additionally, it does not include the several thousand persons experiencing homelessness or with special needs that are assisted through affordable housing programs funded by the State of Colorado, or through vouchers from the U.S. Department of Housing and Urban Development Office of Public and Indian Housing.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

The State of Colorado Department of Local Affairs does not own or manage any public housing.

Actions planned during the next year to address the needs to public housing

The State of Colorado does not own or operate any public housing. Public Housing Authorities may apply to the Division of Housing for funding to replace Public Housing with units financed under a different structure, such as the Rental Assistance Demonstration Program. However, the State cannot support existing public housing units through federal block grants, this is generally prohibited by HOME (24 CFR § 92.213), HTF (24 CFR § 93.203), and CDBG (24 CFR § 570.202) regulations.

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

Not applicable.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable.

Discussion:

CO-911 is designated a high performing agency.

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

DOLA's one year goal to serve persons experiencing homelessness, detailed in section AP-20, encompasses multiple activities, including (though not necessarily limited to):

- Emergency Solutions Grants emergency and day shelter
- Emergency Solutions Grants rapid re-housing
- Emergency Solutions Grants homeless prevention
- Emergency Solutions Grants street outreach

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The Division of Housing often, but does not always, fund street outreach through the ESG program. The programs that are funded in any individual year depend upon the applications submitted by sub-recipients.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Division of Housing plans to serve 5,000 persons experiencing homelessness through ESG grants to emergency shelters and day shelters. No goal will be established, nor funds granted to, transitional housing projects as this is no longer an eligible activity.

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

The Division of Housing plans to serve persons experiencing homelessness through homeless prevention programs funded through ESG, as detailed in section AP-20. Various programs that assist the populations in this prompt are explained in the discussion section below.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The Division of Housing plans to serve 150 persons through homeless prevention programs, funded through ESG. Various programs that assist the populations in this prompt are explained in the discussion section below.

Discussion

The State-funded Mental Health - State Housing Voucher (MH-SHV), Homeless Solutions Program - State Housing Voucher (HSP-SHV), and Recovery-Oriented Housing Program - State Housing Voucher (ROHP-SHV) programs serve individuals with disabling condition who are currently experiencing homelessness or are exiting an institutional setting to homelessness. By providing rental assistance with access to supportive services using the Housing First model, as well as best practices in Harm Reduction and Trauma-Informed Care, program participants with complex barriers to housing stability and long lengths of homelessness have the opportunity to live stable, productive lives in the community of their choice.

Referral networks for the MH-SHV, HSP-SHV, and ROHP-SHV programs include the Colorado Department of Corrections' Division of Adult Parole, the Colorado Department of Human Services (CDHS) Division of Youth Services, regional Coordinated Entry Systems, Jail-Based Behavioral Health (JBBS) programs, as well as those participating in the CDHS Office of Behavioral Health's Momentum or Transitions Specialist Programs with frequent emergency or involuntary commitments, or those in inpatient mental health facilities and hospitals transitioning to community living including defendants pleading "Not Guilty by Reason of Insanity" (NGRI) and defendants determined "Incompetent to Proceed" (ITP).

The Community Access Team helps people with disabilities stay in their homes and communities and out of nursing facilities or other institutions by making their homes affordable, safe and accessible. Specifically, CAT partners with the Department of Health Care Policy and Finance (HCPF, our Medicaid administrator), to offer a state-funded housing voucher with appropriate supportive services for persons who are transitioning out of institutions or at risk of institutionalization. CAT also provides home accessibility improvements (installing ramps, modifying bathrooms and kitchens, widening doorways, etc.) to people with disabilities through a partnership with HCPF's Medicaid Home Modification benefit program, and through a state income tax credit program. HCPF and CAT also work together on implementing a new program to inspect host homes for people with developmental disabilities.

AP-70 HOPWA Goals – 91.320(k)(4)

| One year goals for the number of households to be provided housing through the use of HOPWA for: | |
|--|----|
| Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family | 0 |
| Tenant-based rental assistance | 75 |
| Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds | 0 |
| Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds | 0 |
| Total | 75 |

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

Housing affordability and affordable housing development are impacted by many factors, some of which are within the state’s control. Housing cost is negatively impacted by property taxes in many states. However, residential real estate taxes are very low in Colorado by national standards. The Tax Foundation (a research organization) estimated that the mean tax rate on owner-occupied housing was 0.56% in Colorado in 2018, the 44th lowest residential property tax rate in the United States. Many states and localities in other parts of the United States limit the growth of rents. Research published by Diamond et al. in 2018 titled *The Effects of Rent Control Expansion on Tenants, Landlords, and Inequality: Evidence from San Francisco*, found that rent control reduced rental housing supplies by 15% due to the conversion of rental units to condominiums in order to free them from price controls. However, Colorado prohibits rent control in statute at Colorado Revised Statutes (C.R.S.) 38-12-301.

Traditional economic theory posits that land use policies, zoning ordinances, and building codes negatively impact housing affordability by reducing the amount of units that may be developed than would otherwise be possible without regulations. These policy areas are legislated by localities; the state has no legislative or administrative oversight over these areas. State law compels cities to adopt a comprehensive plan that considers sufficient land for future housing developments, informed by projections of population growth and housing needs (C.R.S. 31-23-206). However, these comprehensive plans are advisory documents, and localities are not required to zone land to build units in particular quantities or to generate affordability at particular levels. Indeed, the state grants Home Rule Charter communities, in which roughly 96% of the population resides (per State Demography Office 2018 population estimates), broad powers to zone areas “for the purpose of promoting health, safety, morals, or the general welfare of the community” meaning that the “the governing body of each municipality is empowered to regulate and restrict the height, number of stories, and size of buildings and other structures, the percentage of lot that may be occupied, the size of yards, courts, and other open spaces, the density of population, the height and location of trees and other vegetation, and the location and use of buildings, structures, and land for trade, industry, residence, or other purposes (C.R.S. 31-23-301).”

Various localities also have urban growth boundaries and even limits on residential building permits. Economic theory suggests that these growth limitations decrease housing affordability for the same reasons as land use policies, by limiting supply and development and driving up demand. Colorado exercises no legislative or administrative control over these local policies.

Actions it planned 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

DOLA staff works with local governments and housing providers to increase their capacity to design, locate and provide infrastructure, economic development and new affordable housing projects. The Department supplements individualized technical assistance with statewide training including capacity building activities for local governments, technical assistance to nonprofit organizations and classes such as the Developer’s Toolkit, Hammering out the Deal, the Pathways Home Supportive Housing Toolkit, and application workshops for housing. The Division of Housing also delivers period fair housing, Section 504, and reasonable accommodation training to its partners and the general public every year. The Colorado Department of Regulatory Agencies, Civil Rights Division delivers free fair housing training multiple times each month, in locations all over the state (at least prior to the COVID-19 pandemic), and online.

During the application review and underwriting process, DOH evaluates local requirements (e.g. permit and tap fees, parking requirements, design requirements, etc.) and their financial impact on affordable housing development. In communities with higher financial barriers to affordable housing development, DOH will encourage developers to seek waivers or flexibility as appropriate from the local government. If those efforts are unsuccessful, DOH assesses each local government’s financial contribution compared to the impact of local requirements on the total project cost to ensure the state is not unreasonably subsidizing local barriers.

Finally, given its limited authority over local land use and zoning decisions under state law, the state is exploring ways to incentivize density, transit-oriented development, and other smart growth strategies that foster affordable housing development.

The Colorado General Assembly passed HB 21-1271, Department of Local Affairs Innovative Affordable Housing Strategies, during the 2021 legislative session. Governor Jared Polis has signed this bill into law, and it will create three programs in DOLA to ameliorate the negative effects of public policies that serve as barriers to affordable housing. The Housing Development Incentives Grant which will offer grants to local governments that adopt at least three policy and regulatory tools from a menu of options enumerated in the bill that incentivize the development of affordable housing. The Local Government Planning Grant Program will provide grants to local governments to assess housing needs or to make changes to local policies to become eligible for a Housing Development Incentives Grant. The Affordable Housing Guided Toolkit will provide funding and technical assistance to local governments that make changes to provide incentives and reduce barriers to the development of affordable housing.

Discussion:

Barriers to affordable housing can unintentionally become barriers to fair housing. Specifically, since

members of racial and ethnic minorities, women, and people with disabilities, protected under Fair Housing law, are disproportionately low-income, lack of affordable housing places greater burdens on them. Overcoming barriers to affordable housing is essential to providing fair housing opportunity for all.

AP-85 Other Actions – 91.320(j)

Introduction:

Actions planned to address obstacles to meeting underserved needs

Within the Division of Local Government, general areas of assistance to the underserved include, but are not limited to budgeting, finance, general government administration, special district administration and elections, and water and wastewater management. In addition, technical assistance staff process and assist with a number of required local government filings that are received by the Department of Local Affairs, and perform research functions for the state, local governments, and other interested individuals.

Technical Assistance Services include administrative, financial, and other assistance to local officials, staff, and citizens in the day-to-day operation of a local government. The Technical Assistance section delivers assistance through workshops, publications, individual consultations and on-line resources. The Division of Local Government provides professional assistance to local governments in many areas of financial management, including investment and cash management strategies, short and long term capital financing options, revenue development, expenditure control, and banking. Staff is available to provide financial trend analysis, a valuable tool in predicting future outcomes. The Division of Local Government offers an annual series of workshops usually at six to nine locations around the state on topics of current financial management interest.

Supplying safe drinking water and treating wastewater are two of the basic services local governments provide. Department staff can assist communities in addressing the range of water and wastewater problems they often face, from deteriorating distribution lines to inadequate budgeting and accounting practices. Department staff are available to analyze needs and develop goals, develop a capital improvement program, analyze rate structures for user and tap fees, coordinate with the Colorado Department of Public Health and Environment and other state and federal agencies, explore funding alternatives and identify plant operator training programs.

DOLA, through OEDIT, serves all rural counties with its Business Loan Funds. The Department reaches out to businesses by annually participating in at least five regional business finance forums throughout the state. The State advertises its infrastructure grants to municipal, county and economic development officials.

Actions planned to foster and maintain affordable housing

DOLA, through the Division of Housing plans to take the following actions to foster and maintain affordable housing: (1) Promote the development and preservation of low-income units by providing HOME, CDBG, or HTF financial support to fill gaps in housing project development, while providing project-based Section 8 Housing Choice Vouchers and State Housing Vouchers for the lowest income and most vulnerable households to subsidize ongoing operations; (2) Providing Veterans Administration Supportive Housing (VASH) vouchers to provide housing combined with supportive services for veterans

experiencing homelessness; (3) creating an initiative that ensures linkage between housing and Medicaid, SAMHSA, TANF and other mainstream human service assistance; (4) Working with key stakeholder groups to make progress toward recognizing and treating the long-term effects of addiction and alcoholism as a disabling condition; (5) Coordinating ESG-funded services with Continuum of Care regions and local jurisdictions to ensure that available funds have the maximum feasible impact on addressing the needs of people experiencing homelessness. The Colorado Legislature typically allocates General Funds to the Division of Housing budget, for a program known as the Housing Development Grant (HDG). Legislation passed in the 2019 session allocated significant additional resources to the HDG budget that will be phased in over the term of the 5 year Consolidated Plan. The expected increase in revenue is reflected in the Anticipated Resources table. Additionally, the Legislature also allocates a portion of a specific tax fund to a subprogram of the Housing Development Grant line; these funds are earmarked to address homelessness. These State funds are the most flexible of the Division's resources, and support creative, community-driven solutions to help ensure that the inventory of units affordable to the lowest income and most vulnerable individuals and families in Colorado continues to expand. DOH received \$9,200,000 in Housing Development Grant funds for the State Fiscal Year that runs from July 1, 2020 through June 30, 2021. Additional state funding includes the Colorado Housing Investment Fund, which originated with mortgage settlement funds. DOH has an agreement with the Attorney General's Office to administer these custodial funds to provide low interest, short- and medium term loan financing to expand affordable rental and homeownership opportunities. The Housing Choice Voucher (HCV) program is the largest housing assistance program the State of Colorado administers. These funds support both the Housing Choice Voucher and Shelter Plus Care programs through DOH. As mentioned previously, the state also funds rental assistance vouchers for special needs populations.

Actions planned to reduce lead-based paint hazards

DOH works closely with sub grantees, contract agencies, and the Colorado Department of Public Health and Environment (CDPHE) to assure that the State's housing programs and projects comply with current requirements of Title X of the Community Development Act of 1992. According to the U.S. Census Bureau and HUD CHAS data, an estimated 961,832 homes in Colorado may contain lead based paint, and more than 140,000 of them have a child present who is under 6 years old. DOH staff reviews each proposed housing project to ensure compliance with Title X, based on the type of project; the type, amount, and duration of financial assistance; and the age of the property. In addition, DOH makes training and technical resources available to local housing providers and developers. DOH is implementing the following activities during the period of 2020–2025 to ensure statewide compliance with applicable lead-based paint regulations. Build capacity for lead-hazard control during renovation and remodeling Reduce lead hazards in single-family owner-occupied housing Partner with local governments to identify and address lead-based paint hazards 1. Enhance Existing Partnerships DOH assists public and private efforts to reduce lead-based paint hazards across the State through involvement in the Colorado Lead Coalition interagency work group, which develops and implements strategies for statewide lead hazard reduction and education efforts. The Coalition includes the U.S. Environmental Protection Agency, Denver Health, the U.S. Department of Housing and Urban

Development, the Colorado Department of Health and Environment and other agencies. DOH also provides technical assistance and supports integration of the various services offered to lower-income households, including participation in current healthy home projects in the state. 2. Provide Lead Hazard Information to Housing Providers, Local Officials and Assisted Households DOH provides all sub-grantees, contractors and local housing and service providers with the most current required publications for distribution to occupants of housing units assisted with Division funds. The DOH staff has a working knowledge of the Environmental Protection Agency (EPA) Renovation, Repair, and Painting Rule (RRP) that requires all rehabilitation contractors to be certified in lead-based paint procedures. DOH has processes in place to confirm that contractors compensated through DOH funded activities are properly RRP certified. 3. Enhance Existing Delivery System and Technical Capacity DOH has increased its involvement in CDPHE's lead-based paint education activities and sponsored additional lead-safe work practice trainings around the State. DOH will continue to provide technical assistance about Title X requirements through web-based training, on-site visits, project underwriting and the distribution of best practice methods. DOH continues to search for funding opportunities to provide additional resources concerning lead-based paint and other home hazards, including funds from HUD's Office of Healthy Homes and Lead Hazard Control grants. DOH will coordinate applications for funding under the Lead Hazard Reduction Program – Healthy Homes Initiative on behalf of the entire state.

Actions planned to reduce the number of poverty-level families

An important antipoverty strategy is development of well-paying jobs. Thus, the key element for lifting people out of poverty is creating and retaining jobs, helping people acquire the right skills to fill those jobs, and connecting the unemployed to jobs. The Office of Economic Development and International Trade (OEDIT) focuses on using CDBG funds for job creation. By helping provide businesses and local governments with the funding and infrastructure they need, OEDIT enables businesses to create and retain jobs. The Division of Housing works to lift people out of poverty by combining housing opportunities with the supportive services needed to achieve self-sufficiency. The DOH funds housing development for people with special needs as well as people experiencing homelessness and chronic homelessness. Programs operated by our Public Housing Authority section include the Family Self-Sufficiency and Family Unification programs, Housing Choice Voucher special needs programs for people with disabilities, Homeless with Substance Abuse initiatives, Housing Choice Voucher Welfare-to-Work program, Project Access vouchers to assist younger persons with disabilities in moving from institutions into the community and Veterans Administration Supportive Housing vouchers that provide permanent housing to homeless veterans. The Office of Homeless Initiatives manages the Next Step 2-Gen Rapid Rehousing program, which is a partnership between the state, local housing agencies, and local school districts. Children experiencing homelessness are identified by the school district and referred to the program. DOH provides rapid rehousing support to stabilize participating families and keep the kids in school and their futures on track. Supportive services are also provided to parents to help them increase both earned and unearned income. The program is designed to break the multi-generational cycle of poverty. Lastly, DOLA recently initiated an Equity, Diversity and Inclusion Committee and one of its charges is to evaluate DOLA's partnerships and programs through a lens of equity. An intended outcome

of this effort is to ensure that all Coloradoans have equal access to upward mobility, regardless of race, ethnicity, or other protected class.

Actions planned to develop institutional structure

DOLA addresses gaps in the institutional structure with ongoing communication, formal training, technical assistance, and outreach. When issues of capacity are identified, DOLA staff target technical assistance to correct the concern. When a service or program is not offered in an area with need, DOLA seeks and supports new partners. In the case of multiple funding sources and public and private financing agencies that supply them, there are also coordination issues to address. Larger projects often cobble together several soft funding sources, and the corresponding requirements layered on top of one another can become cumbersome. Colorado addresses this by collaborating with major funders in quarterly interagency housing meetings. They include agencies such as DOH, the Colorado Housing Finance Authority, the U.S. Department of Housing and Urban Development, the U.S. Department of Agriculture, Rural Development, the City of Denver, and regional CDFIs. These quarterly meetings foster coordination of agency requirements, funding sources and annual targeting of specific priority areas of the State in order to address critical housing needs.

Actions planned to enhance coordination between public and private housing and social service agencies

The Division of Housing takes the following actions and collaborates with the following organizations to enhance coordination between public and private housing and social service agencies: - DOH facilitates interagency coordination of housing, health and social service activities of various public and private agencies by participating in the following efforts: - The DOH Office of Homeless Initiatives (OHI) administers the State Housing Voucher Program, partnering with the Colorado Department of Human Services and statewide community mental health centers to administer state-funded housing vouchers with supportive services for participants with mental health disorders experiencing homelessness.

As part of this effort, OHI collaborates with the following agencies:

- Various offices and divisions within the Colorado Department of Human Services, including child welfare and youth services providers (e.g. Bridging the Gap, Pathways to Success, and Rural Collaborative), Office of Behavioral Health, Division of Youth Services (DYS), and the state mental health institutions;
- The Colorado Department of Corrections and several local jail systems and sheriff offices and re-entry programs;
- The Colorado Department of Education (CDE) and several local school districts; and -AmeriCorps

Volunteers in Service to America (VISTA) in partnership with the Colorado Department of Education, Division of Youth Services and the Rocky Mountain Law Center to incorporate youth voice and improve systems coordination across our work.

- Participation in Colorado's four Continua of Care: Metropolitan Denver Homeless Initiative, Homeward Pikes Peak, Northern Colorado and the Colorado Balance of State.

- As part of the Office of Homeless Initiatives, the Office of Homeless Youth Services, a program within the Division of Housing, meets on a regular basis with statewide agencies to establish goals, objectives and to seek funding through the facilitation of the Advisory Council of Homeless Youth (ACHY).

Colorado joined the Built for Zero initiative in 2019. This effort unites communities representing 15 counties with statewide entities to meet the needs of veterans experiencing homelessness and people experiencing chronic homelessness in Colorado. The effort is supported by Community Solutions, Kaiser Permanente, and the Colorado Department of Local Affairs' Division of Housing. Participating local teams include: Metro Denver (including representatives from Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, and Jefferson counties), which joined in 2016, and Fremont County, Grand Valley (Mesa), Roaring Fork Valley (Pitkin/Garfield/Eagle), Northern Colorado (Weld/Larimer) and Pikes Peak (El Paso), which joined in September 2019.

Built For Zero communities work collaboratively across sectors to establish rigorous goals and corresponding benchmarks intended to drive measurable reductions and reach a sustainable end to homelessness. The Built for Zero effort supports technical assistance and outreach to help communities identify all people living outside by creating an accurate by-name list. By starting with veteran and chronic homelessness, Built For Zero Colorado aims to develop the infrastructure, policies, practices, and resources needed to create a broader continuum of effective solutions.

Discussion:

Actions Planned to Affirmatively Further Fair Housing: The Department of Local Affairs completed an Analysis of Impediments to Fair Housing Choice (AI) to inform this Consolidated Plan. There are a number of Fair Housing goals identified and recommended actions listed, and DOLA believes it can take meaningful action on most items:

1. Promote homeownership and rental opportunities in high opportunity areas/Promote publicly supported housing in high opportunity areas As a gap funder, the Division of Housing does not dictate where projects that submit applications for funding will be located; developers and housing authorities make those decisions based on a number of factors, often long before the state is aware of a project. However, the Division of Housing is committed to evaluating each project and determining whether it is in a Racially/Ethnicly Concentrated Area of Poverty (R/ECAP), or an area with greater access to opportunity. DOH is exploring strategies to incentivize affordable housing development in communities that foster greater upward mobility for their residents.

2. Promote Community and Service Provider Knowledge of ADA and UFAS/Increase outreach and education for housing providers in the state The Division of Housing provides training every year to the affordable housing community, both independently and at conferences or in conjunction with other events. In late 2019, DOH partnered with the Colorado Civil Rights Division (CCRD) to deliver a Fair Housing Act/Section 504/Reasonable Accommodation training, and hopes to continue that partnership each year to provide fair housing training that covers the additional requirements associated with federally-funding properties. CCRD currently offers Fair Housing training multiple times each month, throughout the state. DOH is willing to promote these training opportunities to housing agencies on our mailing list.

3. Enhance community services in R/ECAPS. This goal in the recommended actions within the AI would be difficult to accomplish, as it recommends that DOLA invest CDBG funds in R/ECAPs within the state. All R/ECAPs identified, however, are either completely or mostly in entitlement communities, where state CDBG funds are ineligible. DOLA will look for opportunities to invest its CDBG funds in low-income communities with higher populations of racial and ethnic minorities, however, even if those communities do not meet the R/ECAP definition.

The State of Colorado is firmly committed to equal housing rights and to affirmatively furthering those rights. DOLA will reaffirm its commitment to fair housing by analyzing the affordable housing grant and loan underwriting process over the next year to better understand how it may or may not promote equity and opportunity, will review best practices for promoting equity and opportunity through underwriting, implement changes to DOH underwriting process and standards, educate local governments and developers, and measure the impact of this effort.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

The entries below comprise the program specific requirements for CDBG, HOME, and ESG.

The methods used to identify HOPWA project sponsors is the ability of the organization to effectively fund and provide services to people living with HIV/AIDS throughout the balance of state. Only one organization, Colorado AIDS Project, has this capacity.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

| | |
|--|----------------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 915,107 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan | 0 |
| 5. The amount of income from float-funded activities | 0 |
| Total Program Income: | 915,107 |

Other CDBG Requirements

| | |
|---|---------|
| 1. The amount of urgent need activities | 100,000 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. | |

Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

70.00%

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HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.320(k)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

HOME funding is not used for any form of investment other than those identified in Section 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The State reviews applications for homeownership projects and programs to determine whether resale or recapture restrictions are best suited to each proposal. Generally, recapture is preferred, with the exception of some land trusts or homeownership development projects for which the applicant can demonstrate capacity and a strategy to assist homebuyers to comply with resale requirements during the HOME affordability period. HOME funded homebuyer assistance and rehabilitation of owner-occupied single-family housing programs will be subject to HOME affordable homeownership limits provided by HUD, unless said limits become unavailable in which case the State of Colorado would amend this plan to make use of an equivalent index as detailed at 24 CFR 92.254(a)(2)(iii).

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Recapture: HOME funds subject to recapture include any development subsidy or direct assistance to the homebuyer that reduced the purchase price from fair market value to an affordable price, or any down payment or subordinate financing provided on behalf of the purchaser.

- The property may be sold during the affordability period with full or partial repayment of the HOME assistance. Recaptured funds must be used for additional HOME-eligible activities.

- Full Recapture, subject to net proceeds – subrecipients provide amortizing loans or shared equity investments or other deferred financial assistance that enables them to recapture at least 100% of the funds. If the client sells their home before they have completed repayment of the loan, recapture is subject to net proceeds, with some exceptions.

- Net proceeds = Sales price – Senior debt repayment – Closing costs. Any excess net proceeds, after repayment of the down payment assistance loan to the agency, may be kept by the client, unless their loan is structured with an equity ratio instead of an amortizing interest rate (for Shared Equity Programs).

- Resale to another Low-income Buyer: The subsequent purchaser must be a low-income family (80% or less of area median income) that will use the property as its principal residence.

Such sale must be at a price that allows for "fair return on investment, including any improvements"

to the seller (the former homebuyer).

- The former homebuyer's investment consists of their down payment plus the value of any improvements they made to the house. "Fair return" is defined as the percentage change in the value of the home, based on the percentage change in median home prices and documented by appraisals from the former homebuyer's purchase and the new homebuyer's purchase.
- If median sales prices decline between sales, the seller may not receive a return on their investment.
- The property must be sold at a price that is affordable to a household at no more than 75% to 80% of area median income at a price that will ensure they do not pay more than 30% of their income for principal, interest, taxes and insurance.
- If the affordable sales price is too low to allow the seller a fair return on their investment, the State may provide HOME funding to help a qualified buyer afford a sales price that does ensure a fair return. The new HOME funding would be provided through an existing State subgrantee.
- If the property is transferred by sale or descent, the unpaid balance of the loan will be due and payable immediately (limited to Net Proceeds). Descent to co-borrower is excluded from this provision. Transfers by inheritance or other estate planning tools may be excluded from this provision if the home and its occupant continue to qualify – the new resident must qualify as Low-Income and treat the home as their primary residence. For the purposes of this Program, "sale or transfer of title" shall mean any sale or transfer that will cause the assisted property to be reassessed by the Assessor's Office.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

It is unusual for an application for funding reflecting this model to be brought to the state, as for a property of any significant size, it would likely require a large share of Colorado's annual HOME allocation, but the Division of Housing may use HOME funds to refinance existing debt on an eligible single-family, owner-occupied property when it uses HOME funds to rehabilitate the property, if refinancing in this manner is feasible for the owner and make the housing more affordable for the residents. The Division may also use HOME funds to refinance existing debt on multifamily rehabilitation, or new construction projects if refinancing is necessary for continued long-term affordability and is consistent with State-established guidelines. To qualify, the proposed project must meet one of the following criteria:

- Rehabilitation is the primary eligible activity. This means that the amount of HOME funds for rehabilitation must equal or exceed the amount of HOME funds used to refinance existing debt on the property. The minimum ratio of rehabilitation costs to refinancing costs must be 1 to 1, or a minimum rehabilitation cost of \$5,000 per unit; or
- A review of management practices should demonstrate that disinvestment in the property has not occurred, that the long-term needs of the project can be met, and that it is feasible to serve the targeted population over the proposed affordability period; or

The application must state whether the new investment is being made to maintain current affordable units, create additional affordable units, or both; Regardless of the amount of HOME funds invested, the minimum required period of affordability will be 15 years, although DOH may opt to add additional years to the period of affordability for the project; The State will accept applications for refinancing statewide; and, The State will not use HOME funds to refinance multifamily loans made or insured by any Federal program, including CDBG, unless additional affordable units will be income-restricted to low-income households or the affordability period is extended.

Emergency Solutions Grant (ESG) Reference 91.320(k)(3)

1. Include written standards for providing ESG assistance (may include as attachment)

Please see attached ESG Standards and ESG Policies and Procedures (IDIS does not allow for attachments in the ESG section of AP-90, so this has been attached in the HTF section of AP-90)

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Each of the four Continuum of Care regions is at a different stage in the development of its coordinated assessment system, but each is working towards the development and implementation of a centralized system. The most robust and established system falls under the Denver Metro area Continuum of Care. That system currently serves chronically homeless individuals, veterans and youth, matching them to appropriate housing resources which can include PSH and RRH resources. The Pikes Peak Continuum of Care lead agency oversees the Coordinated Entry system for participants in El Paso County and serves chronically homeless individuals, veterans, youth, and families. The Pikes Peak CoC is also working on expanding their youth Coordinated Entry system policies and procedures. In January 2020, HUD designated the Northern Colorado Continuum of Care, which has implemented a Coordinated Assessment and Housing Placement System (CAHPS). The regional CAHPS Coordinator tracks all households experiencing homelessness who have provided intake information. During weekly CAHPS calls, involving dozens of housing and case management services, adults, youth, veterans, and families are matched with available housing vouchers and units. The Balance of State Continuum of Care has begun piloting coordinated entry in HMIS and has established policies and procedures for regional CE systems throughout the BoS regions. The Balance of State is receiving technical assistance from HUD and DOH. DOH's Office of Homeless Initiatives is intricately involved in the strategy, planning and implementation of each continuum's effort.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

ESG Housing Assistance applications or extension requests are submitted to the Division of Housing whose internal staff screen applications for threshold criteria and forward eligible applications to a scoring committee. This committee includes the ESG program manager, the OHI Director, ESG contract managers, and other relevant state offices. . This committee scores applications and recommends agencies for funding. The Program Manager presents funding recommendations to the Division Director and DOLA’s Executive Director. DOLA’s Executive Director makes the final funding decision.

THRESHOLD CRITERIA

- 501(c)(3) status or unit of general local government
- Compliance with HMIS Participation
- Minimum 50% match requirement
- Ability to meet insurance requirements

SCORING CRITERIA

- Years of experience serving special needs population
- Staff capacity and track record for serving special needs population
- Identify and document need for shelter and/or services
- Financial management capacity
- Policies and procedures for assessing client needs
- Ability to conduct income determinations (when required)
- Ability to comply with grant requirements

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

ESG homeless prevention and rapid rehousing funding decisions are made in coordination with the Continuum of Care regions, whose governing bodies include members with lived experience. The DOH ESG team also has a Lived Experience Advisory Group (LEAG) whose members assist with providing insight into the ESG policies and procedures for the state.

5. Describe performance standards for evaluating ESG.

Currently, the Division of Housing relies on quarterly e-snaps reports that capture unduplicated numbers of persons or households served as well as on-site monitoring performed by DOH staff members.

In partnership with the Continuum of Care regions, new written performance standards are under development using the Consolidated plan, quarterly e-Snaps report, Annual Action Plan and CAPER, as a guide to which performance standards will be recorded, tracked and produced in monthly or quarterly reports. General performance standards such as the unduplicated number of persons or households prevented from becoming homeless and the unduplicated number of persons or households assisted from emergency shelters/streets into permanent housing will be reported.

Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds? Select all that apply:

Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

<p dir="ltr" style="line-height: 1.38; margin-top: 12pt; margin-bottom: 12pt;">N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Eligible Recipients are organizations, agencies, or other entities (including public housing agencies, for-profit entities, or nonprofit entities) that receive HTF assistance from the State as an owner or developer to carry out an HTF-assisted project. To be eligible for HTF assistance, a recipient must:

(1) Make acceptable assurances to the State that it will comply with the requirements of the HTF

program during the entire period that from the time the State selects the recipient to receive HTF funds until the conclusion of all HTF-funded activities;

(2) Demonstrate its ability and financial capacity to undertake the eligible activity, comply with HTF regulations and State requirements, and manage the eligible activity;

(3) Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs; and

(4) Have demonstrated experience and capacity to carry out an eligible HTF activity as evidenced by its ability to own, construct/rehabilitate, manage, and/or operate an affordable multifamily rental housing development.

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The Colorado Department of Local Affairs, Division of Housing (DOH) follows its traditional monthly application process to review proposals and award HTF funds to projects. Applications are accepted on or before the first working day of each month to begin that month's review cycle.

MINIMUM APPLICATION THRESHOLD: Applicants are expected to submit complete applications. The following are the minimum threshold requirements for a complete application. However, DOH may make exceptions to the minimum threshold criteria on a project-by-project basis, according to special circumstances and local conditions.

(1) Demonstrate need by: a) third party market study, b) local housing needs assessment and strategic plan, and

c) local government supporting documentation substantiating the need and expressing support for the proposal

(2) Administrative Capacity: a) no unresolved financial audit findings, b) compliance plan to ensure that Federal and State regulations and reporting requirements will be met, including but not limited to: i) Section 3 and MBE/WBE, ii) Fair Housing and Civil Rights, including Section 504, iii) Residential Anti Displacement and Relocation c) State or Federal procurement requirements, and iv) lead based paint and other environmental hazards, d) property management experience, e) property management plan

that ensures rent and affordability compliance, and f) Tax Credit compliance, as applicable.

(3) Applicant Monitoring Record: a) monitoring finding resolution for on-site visits, b) problems with periodic compliance reports are resolved, c) applicant reporting and pay requests are timely and accurate as determined by: i) applicant is current with all DOH required reporting, and ii) pay requests must be timely, accurate, and current before processing a new grant or loan, and d) previous project experience is not required although additional information will be required.

(4) Completed Application: a) legal notice published and public hearing requirements met, b) documents signed, c) required documents submitted, d) complete project budget, and e) project readiness to proceed.

(5) Site control: a) third party capital needs assessment completed within the past 12 months and covering a period of no fewer than 30 years for rehabilitation projects of multifamily projects of 26 units or more, b) scope of work for rehabilitation projects, c) confirmed local political support, d) local financial support, e) expected planning and zoning approval within 90 days of State Housing Board approval, f) substantial amount of other funds committed including commitments of primary sources of funding. All other funds applied for or in the application process with the expectation of commitment within 90 days from the State Housing Board approval, g) construction and/or acquisition start date, h) construction cost estimate, i) relocation and/or replacement housing required relocation plan and budget submitted, and j) energy Performance Standards

(6) Project affordability period: a) the DOH affordability term will run consecutively with the HUD required term of affordability, b) the minimum affordability term for new construction is 30 years, c) the minimum affordability term for acquisition with or without rehabilitation is 30 years, and d) the affordability term may be reduced or extended to align with the project's permanent funding at the discretion of DOH, but must comply with minimum federal affordability term requirements.

(7) Management capacity: (a) DOH evaluates each applicant's capacity to fulfill the objectives of the project.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Colorado will distribute HTF funds by selecting applications submitted by eligible recipients. 100% of the HTF-assisted units in each project will benefit extremely low income households, though the developments that HTF funds are contributed to may include units that are affordable at higher income levels (however, those units will not be funded with HTF).

Following submission of a complete application (as described in 3.b.), an applicant's ability to obligate

HTF funds, undertake eligible activities in a timely manner, and own/manage/operate an HTF-assisted property in compliance with HUD regulations will be treated as threshold criteria. Another threshold criterion for Colorado's HTF funding will be the creation or preservation of permanent rental housing (transitional housing and shelters are not eligible). Applications that fail to meet all of Colorado's threshold criteria (HTF threshold criteria and application threshold criteria) will not be considered for HTF funding.

The Colorado Department of Local Affairs, Division of Housing (DOH) follows its traditional monthly application process to review proposals and award HTF funds to projects. Applications are accepted on or before the first working day of each month to begin that month's review cycle.

A multi-level DOH staff review is completed for each project prior to the presentation of an application to the State Housing Board, which then makes a funding recommendation to the Colorado Department of Local Affairs' Executive Director.

The first and second funding priorities will be given to applications that meet the State's priority housing needs by:

Providing affordable, community-based supportive housing for people with disabilities or other special needs ("Supportive Housing"). This Supportive Housing priority aligns with Colorado's Priority Need for "Housing and Assistance for People Experiencing Homelessness." Supportive Housing projects should include Federal, State, or local project-based rental assistance to ensure the rents for HTF-assisted units are affordable to extremely low-income families and the projects remain financially sound.

Including 30% AMI units in mixed-income developments that would be infeasible at 30% AMI rents but for HTF funding. This 30% AMI units in mixed-income developments priority aligns with Colorado's Priority Needs for "Affordable Housing Creation" and "Acquisition and Preservation of Affordable Housing Stock."

Most if not all successful applications for HTF funding will meet one of the above criteria. Additionally, other applications that meet Colorado's threshold requirements receive priority for HTF funding as described below.

The third funding priority is leverage. Colorado will consider the extent to which each application includes non-Federal funding sources and local resources and/or concessions. Those with greater local/non-Federal commitment, when resources are available, will receive funding priority.

The fourth funding priority is based on the duration of the affordability period. All HTF units in rental housing projects are required to remain affordable as HTF units for a minimum of 30 years. Projects for which the underwriting supports financial feasibility beyond the minimum period, and for which the owner is willing to commit to a longer affordability period, will receive funding priority.

The fifth funding priority is for applications that contribute to Geographic Diversity (IDIS Con Plan and Action Plan SP-10). Under this criterion, priority for funding will be given to applications for projects that Affirmatively Further Fair Housing and/or are located in rural areas.

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Colorado's priority for geographic diversity is the fifth priority.

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Following submission of a complete application (as described in 3.b.), an applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner will be treated as threshold criteria.

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Colorado's first priority for HTF funding is for projects that provide affordable, community-based supportive housing for people with disabilities or other special needs ("Supportive Housing"). This priority aligns with Colorado's Priority Need for "Housing and Assistance for People Experiencing Homelessness." To meet the criteria for this priority, Supportive Housing projects should include Federal, State, or local project-based rental assistance to ensure the rents for HTF-assisted units are affordable to extremely low-income families.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

All HTF units in rental housing projects are required to remain affordable as HTF units for a minimum of 30 years. Projects for which the underwriting supports financial feasibility beyond the minimum period, and for which the owner is willing to commit to a longer affordability period, are Colorado's fourth funding priority.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

As described above, Colorado's top priority for HTF funding is for projects that provide affordable, community-based supportive housing for people with disabilities or other special needs ("Supportive Housing"), and include project-based rental assistance. This priority aligns with Colorado's Priority Need for "Housing and Assistance for People Experiencing Homelessness".

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

As its third funding priority, Colorado will consider non-federal leverage, or the extent to which each application includes non-federal funding sources and local resources and/or concessions. Those with greater local/non-federal commitment, when resources are available, will receive funding priority over applications with less non-federal leverage.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in

its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.

Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

The State of Colorado uses HOME Subsidy Limits for HTF because they are produced by HUD for another federal source which subsidizes the creation of affordable housing.

To ensure those subsidy limits would work for the state's program design, the Division of Housing conducted an analysis on what it would cost to provide the highest per-unit subsidies we anticipated, which are for our second HTF priority of mixed income housing. The analysis determined the additional development subsidy needed to eliminate debt on individual units so what would cash flow at 60%

could cash flow at a 30% rent. The anticipated subsidy was still below the HOME subsidy limits, so they were determined to be reasonable.

Colorado adopts the HOME maximum subsidy limits for the HTF program:
The 2022 maximum per-unit subsidies are as follows:

Max Subsidy 0 bedroom: \$159,754

Max Subsidy 1 bedroom: \$183,132

Max Subsidy 2 bedroom: \$222,694

Max Subsidy 3 bedroom: \$288,094

Max Subsidy 4 bedroom: \$316,236

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

Colorado uses HTF exclusively for affordable rental housing, and the rental rehabilitation standards are attached.



COLORADO

Department of Local Affairs

Division of Housing

Multi-family Housing Rehabilitation Standards

Effective July 2017

Colorado Department of Local Affairs
Division of Housing
1313 Sherman Street, Room 500
Denver, Colorado 80203
(303) 864-7810
<http://dola.colorado.gov/doh>

Alison George, Director

Multi-Family Housing Rehabilitation Standards

Description:

The Division of Housing (DOH) has created these Multi Family Housing Rehabilitation Standards (Rehab Standards) to uniformly provide for safe, decent, durable, high-performing and affordable housing. They apply to multi-family properties rehabilitated with the use of DOH funding. Further, these standards are written to comply with the requirements of the HOME Investment Partnership Program (HOME) and the National Housing Trust Fund (HTF) and address the following:

- Capital Needs Assessment (found on page 3 in Establishing Scope of Work Priorities)
- Accessibility (found on Page 4 in Applicable Laws and Regulations)
- Disaster mitigation (found on Page 5 in Applicable Laws and Regulations)
- State and local codes (found on Page 5 in Applicable Laws and Regulations)
- Uniform Physical Condition Standards (found on Page 5 in Applicable Laws and Regulations)
- Health and safety (Section 1)
- Lead-based paint (Section 1)
- Major systems (Section 2 thru 11)

These standards are designed to be used with multi-family properties with five or more units. The Single-family Housing Rehabilitation Standards apply to one- to four- unit dwellings of three stories or less.

These standards describe the minimum requirements in a variety of ways including:

- These standards are designed to exceed the Uniform Physical Condition Standards (UPCS) and ensure upon completion, the assisted project and units will be decent, safe, sanitary and in good repair as described in 24 CFR 5.703. Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation identifies, at a minimum, those items that must be inspected along with the observable deficiency and the type and degree of deficiency that must be addressed. Any deficiency found to exist from Appendix A must be addressed, even if a specific standard for that item is not included in this document. In the event that a specific standard is not included for an observed deficiency, the repair shall be completed in a thorough and workmanlike manner in accordance with industry practice.
- Minimum requirements for the materials and methods used. **All construction materials and methods shall be in compliance with locally adopted building codes.** If there are no local codes, then they shall comply with State Code (the National Electrical Code (NEC), 2014 Edition, as may be amended by the Colorado Electrical Board, the International Plumbing Code (IPC) 2015 and the International Fire/Gas Code (IFGC) as amended in the Colorado Plumbing Code, and the International Existing Building Code of the ICC (IEBC)).

Note: At the time of publication and adoption of these standards, the adopted codes

referenced are believed to be those in force. As standards and codes change and are put into effect by the governing authorities having jurisdiction, the new standards and codes will apply in lieu of those referenced.

- The requirements of regulatory agencies such as the local government’s Building, Housing and Zoning Codes; the Environmental Protection Agency (EPA); federal, state and local Historic Preservation requirements. **These Rehabilitation Standards are not meant to substitute for a thorough understanding of all of the codes and regulations that may apply to your projects.**
- The requirements of funders such as HUD (CDBG, HOME, NSP, HTF, CDBG-DR) or local governments, including the Environmental Review process.

In order to access further and more detailed information, hyperlinks to useful web sites are included in this document. They can serve as a valuable resource.

Establishing Scope of Work Priorities:

For all Rehabilitation Projects, health and safety standards represent the highest priority work to be completed first, especially if they are life threatening. Any and all life threatening health and safety deficiencies shall be corrected in every rehabilitation project, regardless of funding source **and must be addressed immediately if the housing is occupied.** Appendix A identifies life-threatening deficiencies in (****bold italic***) for the property site, building exterior, building systems, common areas, and units.

Another top priority for the scope of work is the remaining useful life of all major building systems, which shall be estimated through a Capital Needs Assessment (CNA) or other means and must cover the period of affordability. Federal funding requirements dictate that if a multifamily housing project consists of 26 units or more, a (CNA) shall be performed to determine the remaining useful life of major systems, and the Division of Housing (DOH) may require a (CNA) regardless of project size. Those systems that are found to be at or near the end of their useful life shall be repaired or replaced as part of the rehabilitation of the project. A replacement reserve shall be established and monthly payments made to the reserve account in an amount adequate to repair or replace systems as needed through the entire period of affordability. Major systems include the structure, roof, cladding, weatherproofing (windows, doors, siding, gutters, etc.), plumbing, electrical, heating, ventilation, and air conditioning, and are identified by the symbol “[**MAJOR SYSTEM**]”.

The next priority for inclusion in the scope of work is any violation of locally adopted building code, housing code, zoning ordinance, and/or disaster mitigation standards. It is important for Grantees and their Contractors/Subcontractors to be knowledgeable about their local codes, and to communicate freely with local code officials if their code requirements are unclear. If there are no locally adopted building codes, then State Code (the National Electrical Code (NEC), 2014 Edition, as may be amended by the Colorado Electrical Board, the International Plumbing Code (IPC) 2015 and the International Fire/Gas Code (IFGC) as amended in the

Colorado Plumbing Code, and the International Existing Building Code of the ICC (IEBC)).

Most building codes, including the International Existing Building Code of the ICC (IEBC), allow for building components that were constructed in compliance with the building code that was in effect at the time, and that do not pose a health or safety threat, to remain as is. Generally, they do not need to be improved to meet current code unless they are a threat to health or safety. The same applies to these Rehab Standards – if a building component is not a threat to health or safety, and if it complies with the building code that was in effect when it was built, then the component does not need to be brought into compliance with these standards.

Grantees may choose to implement “Green Standards,” identified by this symbol - **[GREEN STANDARD]**, unless they are found under health and safety, in which case they shall be corrected to the GREEN STANDARD. These standards accomplish one or more of the following:

- Conserve water
- Conserve energy
- Provide residents with a healthier living environment
- Reduce impact on the natural environment
- Create a more sustainable product lifetime

In areas where the **[GREEN STANDARD]** is optional and a Grantee chooses not to implement the GREEN STANDARD, the repair or replacement shall be completed according to applicable codes and in accordance with industry standards.

Source Documents:

The standards in this document were adapted from a template used by Livable Housing, Inc., a consulting and training firm, and were based on a number of similar documents used in various housing rehabilitation programs. The standards with the label **[GREEN STANDARD]** were added with the assistance of Enterprise Community Partners and intended to be used for including green rehabilitation improvements that follow accepted national green building standards such as LEED and the Green Communities Criteria.

Applicable Laws and Regulations

These Rehabilitation Standards are not meant to substitute for a thorough understanding of all of the regulations that may apply to your projects.

The following statutory and regulatory requirements are applicable to projects funded with federal funds:

- HUD – HOME, HTF or CDBG regulations (depending on the funding source used)
- Broadband infrastructure as defined in 24 CFR 5.100 for substantial rehabilitation of a building with more than 4 rental units, the rehabilitation must provide for installation of broadband infrastructure, as this term is also defined in 24 CFR 5.100. This requirement

may be waived if DOLA makes a written determination that such installation is not required in accordance with the requirements at 24 CFR 570.482(c)(5) (CDBG), 24 CFR 92.251(b)(1)(x) (HOME), or 24 CFR 93.301(b)(1)(x) (HTF).

- Accessibility Requirements in 24 CFR part 8, which implements Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Titles II and III of the Americans with Disabilities Act (42 U.S.C. 12131 – 12189) Implemented at 28 CFR parts 35 and 36, as applicable. Covered multifamily dwellings, as defined at 24 CFR 100.201 shall also meet the construction requirements at 24 CFR 100.205.
- NEPA Environmental Review
- Local Code: Current locally adopted Building, Housing and Zoning Codes, including any local Disaster Mitigation Standards.
- If no local Building Code: State Code (the National Electrical Code (NEC), 2014 Edition, as may be amended by the Colorado Electrical Board, the International Plumbing Code (IPC) 2015 and the International Fire/Gas Code (IFGC) as amended in the Colorado Plumbing Code, and the International Existing Building Code of the ICC (IEBC)).
- Federal Code: For programs funded with HOME or HTF funds after January 24, 2014, HUD will adapt the Uniform Physical Condition Standards (UPCS) inspection protocol for housing rehabilitation.
- Environmental Protection Agency (EPA) regulations including the RRP regulations for Lead Based Paint
- EPA regulations for the Resource Conservation and Recovery Act (RCRA), dealing with hazardous materials.
- If the building is over 50 years old, then the Colorado State Historic Preservation Office (SHPO) requirements as well as any federal or local Historic Preservation requirements.
- Life Safety Code – NFPA 101 as published by the National Fire Protection Association.

The following are additional guidelines and codes that may apply:

- Energy: A locally adopted energy code, 2009 (or newer) International Energy Conservation Code (IECC).
- Accessibility: ANSI standards for accessibility by disabled residents
- HAZMAT: HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing

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Appendix A: Uniform Physical Condition Standards for Multifamily Housing

1) Health and Safety

[GREEN STANDARD] is mandatory in this section

| Contaminants [GREEN STANDARD] | |
|---|--|
| Repair Standard | |
| N/A | |
| Replacement Standard | |
| <p>All materials installed shall meet the following standards to minimize the presence of Volatile Organic Compounds (VOC) and Formaldehyde:</p> <ul style="list-style-type: none"> • All paints and primers should meet the most recent Green Seal G-11 Environmental Standard. http://www.greenseal.org/Home.aspx • All particleboard components shall meet ANSI A208.1 for formaldehyde emission limits, or all exposed particleboard edges shall be sealed with a low-VOC sealant or have a factory-applied, low-VOC sealant prior to installation. All MDF edges shall meet ANSI A208.2 for formaldehyde emission limits, or all exposed MDF edges shall be sealed with a low-VOC sealant or have a factory-applied, low-VOC sealant prior to installation. | |

| Lead-Based Paint (LBP) [GREEN STANDARD] | |
|---|--|
| Repair Standard ("Interim Controls") | |
| <p>For all housing units constructed prior to 1978, they must meet the lead-based paint requirements at 24 CFR part 35 and must follow HUD LBP Guidelines including testing for LBP and Lead-safe work practices. Only EPA-certified Renovation, Repair and Painting (RRP) contractors may perform the work. See: http://www.hud.gov/offices/lead/lbp/hudguidelines/</p> <p>All interim controls shall be performed as follows and by properly trained workers:</p> <ul style="list-style-type: none"> • When any LBP-coated surfaces are disturbed, the work area shall be sealed and tenants of occupied buildings shall be adequately protected from LBP hazards. • Occupants may be temporarily relocated as required by the regulations. • All surfaces coated with LBP shall be properly maintained over the life of the program covenants. • Tenants living in buildings constructed prior to 1978 that are not certified as being "lead free" shall be provided with the "Protect Your Family from Lead in Your Home" pamphlet, the location and condition of known LBP, and advance written notice prior to any lead-hazard reduction activity. | |
| Replacement Standard ("Abatement") | |
| <p>When Interim Control is impractical, the most affordable solution for abatement of the component shall be chosen. For example, walls containing LBP may be covered with drywall or</p> | |

guttled and replaced with drywall. Trim and other wood or metal components containing LBP may be removed and replaced with similar materials.

Any work must meet the lead-based paint requirement at 24 CFR par 35 and must follow HUD LBP Guidelines including Lead-safe work practices, and only use EPA-certified abatement contractors to perform the work. See: <http://www.hud.gov/offices/lead/lbp/hudguidelines/>

Asbestos [GREEN STANDARD]

Repair Standard

Asbestos can be found in these and many other common building materials: Ceiling textures, vinyl floor coverings and mastic, boiler and pipe insulation, heating and cooling duct insulation, ceiling tile, roofing products, clapboard shingles, etc. An asbestos inspection by a certified asbestos building inspector is required in Colorado if the trigger level of suspect materials to be disturbed is exceeded. An exemption is possible only if it can be shown that the building was constructed after October 12, 1988 **and** either no asbestos containing material (ACM) was specified in any construction document for the building OR no ACMs were used in the building.

For more information and repair requirements, see the Colorado Dept. of Public Health and Environment's Asbestos website at: <http://www.colorado.gov/cs/Satellite/CDPHE-AP/CBON/1251594599613>

Replacement Standard

Abatement of friable asbestos-containing materials in Colorado shall be performed by a General Abatement Contractor, certified by the Colorado Dept. of Public Health and Environment's Air Pollution Control Division.

For more information and abatement requirements, see the Colorado Dept. of Public Health and Environment's Asbestos website at: <http://www.colorado.gov/cs/Satellite/CDPHE-AP/CBON/1251594599613>

Radon [GREEN STANDARD]

Repair Standard

All residential buildings shall be subject to a "Short Term" Radon Test. If the result is a reading of 4 pCi/L or higher, then perform a follow-up "Short Term" test and average the results. If the average is above 4 pCi/L, remediation shall be required.

| | |
|--|--|
| <p>Radon test kits may be purchased from your local home improvement store. Be sure the kit says "certified by the National Radon Proficiency Program." Individuals can also get coupons for mail-order test kits on the Colorado Dept. of Public Health and Environment's website: http://www.colorado.gov/cs/Satellite/CDPHE-HM/CBON/1251617274212</p> | |
| Replacement Standard | |
| <p>If, as a result of the testing above, there is a presence of Radon at or above the 4 pCi/L level, remediation shall be undertaken per the EPA guidance in their Consumer's Guide to Radon Reduction: http://www.epa.gov/radon/pubs/consguid.html.</p> <p>If the home's water comes from a private well, the water should also be tested. Water testing is available from the Colorado Department of Public Health and Environment's Laboratory Services Division.</p> | |

| | |
|--|--|
| Mold [GREEN STANDARD] | |
| Repair Standard | |
| <p>Any presence of mold is unacceptable and shall be addressed per the National Center for Healthy Housing protocol "Creating a Healthy Home." Once the source of the mold causing moisture has been identified and repaired, All carpeting, drywall or other gypsum-based wall coverings or any other non-structural components with mold present shall be removed and replaced.</p> | |
| Replacement Standard | |
| <p>U.S. Environmental Protection Agency (EPA) and the U.S. Centers for Disease Control and Prevention (CDC) recommend that trained mold remediation professionals do the mold clean up if mold growth covers more than 100 square feet, or a 10 foot by 10 foot area.</p> <p>All carpeting, drywall or other gypsum-based wall coverings or any other non-structural components with mold present shall be removed and replaced. The National Center for Healthy Housing protocol "Creating a Healthy Home" shall be followed for remediation of structural components: http://www.nchh.org/Portals/0/Contents/FloodCleanupGuide_screen_.pdf</p> | |

| Fire Safety - Egress | |
|--|--|
| Repair Standard | |
| N/A | |
| Replacement Standard | |
| Egress windows are required in all new sleeping and living areas unless other secondary means of escape requirements are met, in accordance with local building codes or the IEBC. No bedrooms shall be created in attics or basements unless Life Safety Code (NFPA 101) egress requirements are met. | |

| Fire and CO Alarms [GREEN STANDARD] | |
|--|--|
| Repair Standard | |
| Existing fire and smoke, carbon monoxide and security systems that meet current local code (or the IEBC) and Colorado State Statute, shall be repaired to operating condition. If hard wiring of smoke detectors is not feasible, then detectors with 10 year lithium batteries may be used. | |
| Replacement Standard | |
| Smoke and carbon monoxide detectors shall be installed to meet current local code (or the IEBC) and in accordance with Colorado Statute. If hard wiring of smoke detectors is not feasible, then detectors with 10 year lithium batteries may be used. | |

2) Site

| Drainage [GREEN STANDARD] | |
|--|-----|
| Repair Standard | |
| All grading or impervious surfaces adjacent to the building and for a distance of at least 10 feet away from the building shall slope away from the structure at a pitch of at least 1 inch per foot. Sidewalks used for access cannot have a cross slope more than ¼" per foot. Holes or depressions of more than six inches (6") in diameter should be filled to correct drainage problems and remove safety hazards. All bare earth within three feet of the foundation shall be planted with low-water landscaping. Bare earth more than three feet from the foundation may be reseeded with grass or planted with low-water landscaping. For more information, see Denver Water's website at: http://www.denverwater.org/Conservation/Xeriscape/ | |
| Replacement Standard | N/A |
| N/A | |

| Outbuildings | |
|---|-----|
| Repair Standard | |
| Unsafe and blighted structures, including outbuildings, may be removed if it is not financially feasible to complete the repairs required to make them structurally sound, leak-free, with any health or safety hazards stabilized. Detached garages should have operable and lockable doors and windows. | |
| Replacement Standard | N/A |
| DOH rehabilitation funds may not be used to replace outbuildings. | |

| Fencing and Gates | |
|---|--|
| Repair Standard | |
| Existing fences shall be in good repair. Holes, broken pickets, torn chain-link fabric, missing top-rails, defective posts or supports, broken or missing masonry units, peeling paint, wobbly gate posts, gates which don't open and close properly, etc. shall be repaired. | |
| Replacement Standard | |
| DOH rehabilitation funds may not be used to replace fencing. | |

| Paving And Walks | |
|--|--|
| Repair Standard | |
| Sidewalks, driveways, and concrete or asphalt paved pads or parking areas shall be free of trip hazards. Any such surfaces that are excessively cracked, crumbling, irregular, or uneven shall be repaired or replaced. All existing driveways and automobile parking areas which are deteriorated or consist of materials unable to support vehicle traffic shall be removed, improved, or replaced. | |
| Replacement Standard | |
| Un-repairable essential walks and driveways shall be replaced with permeable paving, if financially feasible [GREEN STANDARD] , or with concrete per local codes (or IEBC). All concrete in public right of way areas shall conform to the local permitting jurisdiction's Building and Planning Department's requirements. Walkways and areas subject to pedestrian traffic shall be finished in such manner as to minimize slip hazards when wet. | |

| Trees and Shrubbery | |
|--|--|
| Repair Standard | |
| Trees that are dead, dying, or hazardous may be removed or trimmed, if that removes the hazard. Trees that could damage the structural integrity of an adjoining building above or below the foundation shall be removed. Removal shall include cutting close to the ground, and should also include grinding of the stump to 12 inches below the finished grade, installation of topsoil and re-seeding. | |
| Replacement Standard [GREEN STANDARD] | |
| Replacement trees and shrubs are permitted if economically feasible and shall be selected from the State Extension Service list of local, drought-resistant and non-invasive plant materials. In placement of trees, attention should be paid to shading the building to reduce air conditioning costs. Also, trees should be located a sufficient distance from foundations, sidewalks, walkways, driveways, patios and sidewalks in order to avoid future damage from root growth, branches brushing against the structure, and fire. Setbacks from structures should typically exceed half of the canopy diameter of a full-grown example of the species. | |

| Lawn [GREEN STANDARD] | |
|---|--|
| Repair Standard | |
| Bare section of lawn may be reseeded with drought-resistant grasses or plantings. For more information, see Denver Water’s website at: http://www.denverwater.org/Conservation/Xeriscape/ | |
| Replacement Standard | |
| Over-seeding is permitted with drought-resistant varieties. If lawn grasses do not exist at property, drought-resistant sod can be used for renovation if existing vegetation is removed and the underlying soil is tilled or core cultivated (aerified). | |

3) Building Exterior

NOTE: Any exterior work on a building that is historic shall follow the Colorado State Historic Preservation Office guidelines and any applicable local or federal regulations on historic properties.

| Exterior Cladding [MAJOR SYSTEM] [GREEN STANDARD] | |
|--|--|
| Repair Standard | |
| Siding and trim shall be intact and weather tight and shall not permit the entry of water, snow, wind, or rodents into the interior. They shall be free of holes and broken or rotted finish materials and shall be capable of being kept in a clean and sanitary condition. All painted exterior components shall have a minimum of one continuous coat of paint, and no exterior painted surface shall have any deteriorated paint. Buildings designated as historic shall have existing siding repaired to blend with existing and shall be spot-primed and top-coated in a lead-safe manner. | |
| Replacement Standard | |
| Buildings may have siding replaced with wood, vinyl or cementitious siding to match the existing configuration. New wood components shall be FSC certified: http://www.fsc.org/ . All new surfaces that will receive paint shall be primed prior to painting. | |

| Exterior Porches | |
|--|--|
| Repair Standard | |
| Deteriorated concrete porches shall be repaired when possible. Unsafe wood porch components shall be repaired when possible. Porch repairs shall be structurally sound, with smooth and even decking surfaces. Deteriorated wood structural components shall be replaced with preservative-treated wood. | |
| Replacement Standard | |
| Decks and railings on porches shall be replaced in accordance with local codes (or IEBC). Replaced wood structural components shall be preservative-treated. New porches on historic buildings shall be historically sensitive. | |

| Exterior/Interior Railings | |
|-----------------------------------|--|
| Repair Standard | Existing handrails and railings shall be structurally sound and meet local codes (or IEBC). Guard rails are required on any accessible area, including stairs, with a walking surface over 30" above the adjacent ground level. Structurally sound railings may be repaired if it is possible to maintain the existing style. On historic structures, railing repairs shall be historically sensitive. |
| Replacement Standard | Handrails shall be present on one side of all interior and exterior steps or stairways with more than two risers and around steps, porches or platforms over 30" above the adjacent ground level, and shall meet local codes (or IEBC). On historic structures new exterior railings shall be historically sensitive. |

| Exterior Decks and Exterior/Interior Steps | |
|---|--|
| Repair Standard | Steps, stairways, and porch decks shall be structurally sound, reasonably level, with smooth and even surfaces. Repairs shall match existing materials. |
| Replacement Standard | Decks and steps shall be constructed to meet local codes (or IEBC). Replaced wood structural components shall be preservative-treated. On historic structures new wood decking shall be structurally sound and historically sensitive. |

4) Foundations and Structure

| Firewalls [MAJOR SYSTEM] | |
|--|---|
| Repair Standard | Firewalls (between separate dwelling units and between dwelling units and attached garages) shall be maintained without cracks and plaster deterioration and covered with 5/8" type X gypsum, glued and screwed to structure. |
| Replacement Standard | When frame walls and floors adjoining other dwellings or attached garages are gutted, new wall finish installations shall conform to local codes (or IEBC) for fire ratings. |

| Foundations [MAJOR SYSTEM] | |
|---|--|
| Repair Standard | |
| Foundations shall be repaired to be sound, reasonably level, free from movement, and prevent the entrance of water or moisture. Cracks in foundation walls shall be effectively sealed and loose or defective mortar joints shall be replaced. All foundations that show evidence of leakage from the outside require appropriate and effective waterproofing. All earth-to-wood contact shall be eliminated. | |
| Replacement Standard | |
| Foundation replacements shall be completed to meet local codes (or IEBC). | |

| Structural Walls [MAJOR SYSTEM] | |
|--|--|
| Repair Standard | |
| Structural framing and masonry shall be free from visible deterioration, rot, or serious termite damage, and be adequately sized for current loads. Prior to rehab, all sagging rafters shall be visually inspected, and significant structural damage and its cause shall be corrected. | |
| Replacement Standard | |
| New structural walls shall be constructed to meet local codes or (IEBC). All exterior walls that are part of the building envelope (the air barrier and thermal barrier separating the conditioned space from the non-conditioned space) shall be insulated to meet local codes (or IEBC). | |

5) Windows and Doors

| Interior Doors | |
|--|--|
| Repair Standard | |
| Interior door, frames, jambs and casings shall be in good condition and free of excessive scratches, gouges, chipping, peeling, or other unsightly damage or wear and in good working order. Doors shall be free of holes, delaminating skins, broken stiles or rails. Gaps should be sufficient to prevent rubbing but no larger than ¼". Baths and occupied bedrooms shall have operating doors and lock sets. | |
| Replacement Standard | |
| Hollow-core, pressed-wood product consistent with the style of existing doors including latch-sets. Baths and occupied bedrooms shall have lock sets. | |

| Exterior Doors [MAJOR SYSTEM] | |
|--------------------------------------|---|
| Repair Standard | Exterior door, frames, jambs and trim shall be in good condition and free of excessive scratches, gouges, chipping, peeling, or other unsightly damage or wear and in good working order. Doors shall be free of holes, delaminating skins, broken stiles or rails. Exterior doors shall be solid, weather-stripped to be air tight and shall operate smoothly. They shall include a peep sight, an entrance lock set and a deadbolt that is operable from the interior side without the use of a key, tool or special knowledge. Security or screen doors shall be in good working condition, including any latches and locks, and no broken glass and ripped or torn screens should be present. |
| Replacement Standard | Replacement doors at the front of historic buildings shall be historically sensitive. Steel, insulated doors may be installed at entrances not visible from the front street and on the front of the property for buildings that are not historic. Dead bolt locks that are operable from the interior side without the use of a key, tool or special knowledge shall be installed on all exterior doors and keyed to match the entrance lock set. All new doors shall be weather-stripped to be air tight. Security or Screen doors may be replaced if repairs are not feasible. |

| Windows [MAJOR SYSTEM] [GREEN STANDARD] | |
|--|--|
| Repair Standard | Other than fixed windows, all windows shall be capable or being easily opened and closed, remain in an open position when placed there by window hardware, not sticks or other such items. Windows shall lock when closed and the open section shall be covered with a screen. Glass shall be free of open holes or cracks and secured with an adequate amount of putty. Windows shall be weather-stripped to be air tight when closed. |
| Replacement Standard | Windows that are not repairable shall be replaced. New windows shall meet all requirements of current local building codes or (IEBC) and shall meet the ENERGY STAR standard for this geographic region. For more information: http://www.energystar.gov/index.cfm?c=windows_doors.pr_anat_window Windows on key façades of historically sensitive properties shall be wood of the style original to the building. New windows on other properties may be vinyl and double-glazed. |

| Basement Windows and Ventilation [MAJOR SYSTEM] | |
|--|--|
| Repair Standard | |
| If feasible, two basement windows on opposite sides of the building should be operable for ventilation, in good working order, and lockable. | |
| Replacement Standard | |
| Basement windows may be replaced with glass block, so long as a minimum of two glass block windows on opposite sides of the building have operable and lockable center vents. If the basement is used as a sleeping or living area, please refer to Section 1 for Fire Safety – Egress requirements. | |

6) Roofing

| Flat and Low-Slope Roofing [MAJOR SYSTEM] | |
|---|--|
| Repair Standard | |
| Built-up roofing that is leak-free may be repaired so that the roof is free of peeling, shipping, sloughing, fissures, cracks, lifting seams, excessive bubbles or excessive alligating in coatings or asphalt flood coats. Roof coatings shall be in good condition and consist of compatible materials. Gravel roofs shall have gravel present in sufficient quantity and proper distribution. Flashing and accessories shall be repaired and properly sealed. Asphalt shingles or cold-application rolled roofing shall be replaced if the roof slope is less than 2:12. | |
| Replacement Standard | |
| The most cost-effective roof shall be installed to the manufacturer’s specifications and in accordance with local codes (or IEBC). | |

| Pitched Roofs [MAJOR SYSTEM] | |
|---|--|
| Repair Standard | |
| Missing and leaking shingles and flashing shall be repaired on otherwise functional roofs provided there are no excessive lumps, breaks, tears, inconsistent birdsmouths, and the shingle roof has substantial well adhered mineral surface covering the tabs and grooves. Shingle roofs with loose minerals surface, sparsely covered surfaces, excessive curling, cupping, breakage or brittleness should be replaced. Slate, metal and tile roofs shall be repaired when feasible. | |

| | |
|---|--|
| Replacement Standard | |
| The most cost-effective roof shall be installed except that roofing may be installed to match other structures in the complex, or to preserve other architectural elements. On historic structures new roofing shall be historically sensitive. All roofing shall be installed to the manufacturer's specifications and in accordance with local codes (or IEBC). | |

| | |
|--|--|
| Gutters and Downspouts [MAJOR SYSTEM] [GREEN STANDARD] | |
| Repair Standard | |
| Gutters and downspouts shall be in good repair, leak free and collect storm water from all lower roof edges. Concrete splash blocks shall be installed to move water away from the foundation. The system shall move all storm water away from the building and prevent water from entering the structure. In addition to positive drainage away from the building, outlets shall be a minimum of 3 feet away from the foundation. | |
| Replacement Standard | |
| Gutters and downspouts shall be installed and collect storm water from all lower roof edges. Concrete splash blocks shall be installed to move water away from the foundation. The system shall move all storm water away from the building and prevent water from entering the structure. In addition to positive drainage away from the building, outlets shall be a minimum of 3 feet away from the foundation. | |

7) Insulation and Ventilation

| | |
|---|--|
| Infiltration [GREEN STANDARD] | |
| Repair Standard | |
| Any unit receiving energy-efficiency improvements shall be tested with a Blower Door and existing air sealing shall be repaired to attain a maximum 0.35 Air Changes per Hour at 50 Pascal pressure (0.35 ACH50). | |
| Replacement Standard | |
| All units shall be air sealed to meet the minimum Blower Door test requirements of 0.35 Air Changes per Hour at 50 Pascal pressure (0.35 ACH50). | |

| Insulation [GREEN STANDARD] | |
|---|--|
| Repair Standard | |
| If being added, insulation shall be installed per the manufacturer's instructions and at the recommended R-value for the dimensional lumber used in the wall construction. All exposed heat ducts and hot water or steam heat distribution piping along with general use hot water piping which are located in unheated spaces shall be insulated or otherwise protected from heat loss. All water distribution piping shall be protected from freezing. | |
| Replacement Standard | |
| When siding is being replaced and/or interior wall finishes of exterior walls are being replaced in a building, such exterior walls are to be provided with insulation and at the recommended R-value for the dimensional lumber used to construct walls. The ENERGY STAR Thermal Bypass Inspection Checklist should be completed, found at: http://www.energystar.gov/ia/partners/bldrs_lenders_raters/downloads/Thermal_Bypass_Inspection_Checklist.pdf | |

| Bath Ventilation [MAJOR SYSTEM] [GREEN STANDARD] | |
|--|--|
| Repair Standard | |
| All bathroom ventilation shall meet the local building code (or IEBC) for bath ventilation that was in effect at the time of their construction. | |
| Replacement Standard | |
| All bathrooms shall be mechanically vented to the ≥ 80 CFM creating ≤ 0.3 Sones of fan noise and shall be on the same switch as the bathroom light. Fans shall be installed according to manufacturer's specifications and shall meet the local building code (or IEBC). | |

| Kitchen Ventilation [MAJOR SYSTEM] [GREEN STANDARD] | |
|--|--|
| Repair Standard | |
| All kitchen ventilation shall be functional and meet the local building code (or IEBC) for kitchen ventilation that was in effect at the time of their construction. | |
| Replacement Standard | |
| All kitchens shall have functional mechanical ventilation operating at a minimum 150 CFM. Any new ventilation system shall meet current local code requirements (or IEBC). | |

| Roof Ventilation [MAJOR SYSTEM] [GREEN STANDARD] | |
|--|--|
| Repair Standard | |
| All structures shall meet the local building code (or IEBC) for roof ventilation that was in effect at the time of their construction. | |
| Replacement Standard | |
| All new roofing systems shall meet current local code requirements (or IEBC) for ventilation. | |

8 - Interior Standards

| Interior Walls and Ceilings | |
|--|--|
| Repair Standard | |
| Walls should be smooth wood, plywood, plaster or sheetrock/drywall. All interior walls shall be finished without noticeable irregularities, be free of exposed wiring, have a hard waterproof surface in areas subject to moisture, shall not allow significant entry of air in the unit, and shall be durably painted or otherwise appropriately finished. Holes, cracks and deteriorated and un-keyed plaster shall be repaired to match the surrounding surfaces. All visual painted surfaces shall be stabilized to minimize lead paint hazards using premium vinyl acrylic paint. | |
| Replacement Standard | |
| All walls, in areas not subject to moisture, shall be replaced with ½" sheetrock/drywall. All replaced sheetrock/drywall shall be taped, floated, sanded, textured to match other wall areas, primed and painted. Moisture resistant materials shall be used in areas subject to moisture. All Fire-rated assemblies shall be specified on a project-by-project basis as required by local codes (or IEBC). | |

| Flooring | |
|--|--|
| Repair Standard | |
| Floor framing shall be capable of supporting existing dead load and anticipated live loads as appropriate for type of structure and class of occupancy. All subfloors should be solid and continuous, without liberal movement or bounce, and free from rot and deterioration. Bathroom, kitchen and other water-susceptible floor areas shall be covered with water-resistant flooring that is free from tears or tripping hazards. Wood floors shall be in sound | |

| | |
|--|--|
| <p>condition without excessive gouges, breakage, lifting, curling, buckling, or shrinking. Carpet shall be clean and in safe and sanitary condition free or excessive wear, tears, soil, folds, and shall be property attached. Tile floors shall be free of cracked, broken, loose or missing tiles with grout intact.</p> <p>[GREEN STANDARD] Damaged wood floor shall be repaired when possible. When existing deteriorated carpet is installed over hardwood floors, the hardwood may be refinished whenever practical, taking into account the relative cost of replacing carpet and the needs of the residents.</p> | |
| Replacement Standard | |
| <p>Floor framing shall meet local code requirements (or IEBC). Subfloors shall be a minimum of ¾ inch plywood. Kitchens, baths, and other water-susceptible area shall receive resilient sheet goods.</p> <p>[GREEN STANDARD] Whenever practical, rooms other than kitchens and baths with existing wood flooring shall be maintained as wood floors and refinished when appropriate. Rooms other than kitchens or baths without usable wood floors may be finished with carpet and associated products that are Carpet and Rug Institute’s Green Label certified. For more information: http://www.carpet-rug.org/residential-customers/selecting-the-right-carpet-or-rug/green-label.cfm</p> <p>All new flooring shall be installed in accordance with manufacturer’s recommendations.</p> <p>New basement slabs shall be installed to local codes (or IEBC).</p> | |

| Closets | |
|--|--|
| Repair Standard | |
| Existing closets shall be maintained in good repair and have a shelf and clothes rod. | |
| Replacement Standard | |
| New closets may be created if there is a significant lack of storage space and the budget permits. New closets shall have a minimum depth of 2 feet and include a shelf and clothes rod. | |

| Cabinets and Countertop | |
|---|--|
| Repair Standard | |
| Kitchens shall have countertop and storage space adequate for the preparation and storage of food. Countertops shall free of wear, water damage, and uplifting of surface material. Existing cabinets with hardwood doors and face frames may be repaired if in good condition. All cabinets shall be sound and cleanable with no missing doors, drawers or hardware. All doors and drawers shall operate properly. | |
| Replacement Standard | |
| Kitchens shall have countertop and storage space adequate for the preparation and storage of food. Countertops shall be of water-proof material and backsplashes shall be provided. Replacement cabinets shall be factory-finished builders-grade or better with hardwood doors and face frames. | |

| Appliances | |
|---|--|
| Repair Standard | |
| All appliances in units shall be in proper working order and in clean and sanitary condition. | |

| | |
|--|--|
| Replacement Standard | |
| All new appliances shall be "Energy Star" rated. | |

9) Electric

Note: If there is no local building code, then all electrical work shall comply with the State Code (the National Electrical Code, 2011 Edition, as may be amended by the Colorado Electrical Board).

| Lighting | |
|---|--|
| Repair Standard | |
| All halls, stairs and rooms necessary to cross to other rooms and stairways shall be well lit. All lights and switches in hallways, stairs and other passages shall be operable and safe. | |
| [GREEN STANDARD] Existing fixtures with incandescent lamp fittings shall have CFL replacement lamps installed. | |

| | |
|---|--|
| Replacement Standard | |
| All halls, stairs and rooms necessary to cross to other rooms and stairways shall be well lit. Attics, basements and crawl spaces shall have utility fixtures. All new light fixtures shall be ENERGY STAR labeled. | |

| Interior Electric Distribution [MAJOR SYSTEM] | |
|---|--|
| Repair Standard | |
| Exposed knob and tube shall be replaced. Every room shall have a minimum of two duplex receptacles, placed on separate walls and one light fixture or receptacle switched at each room entrance. All electrical outlets used in bathrooms and toilet rooms, kitchens, all outlets within six feet (6') of a water source (excluding washing machines and sump pumps), outlets located on open porches or breezeways, exterior outlets, outlets located in garages and in non-habitable basements, except those outlets that are dedicated appliance outlets, shall be Ground-Fault Circuit Interrupter (GFCI) protected. Where the source wiring circuit is accessible (e.g. first floor above basements, in gutted rooms, etc.), receptacles shall be grounded. Permanently installed or proposed stoves, refrigerators, freezers, dishwashers and disposals, microwaves, washers and dryers shall have separate circuits sized to meet local codes (or State Electrical code). All switch, receptacle, and junction boxes shall have appropriate cover plates. Wiring shall be free from hazard, and all circuits shall be properly protected at the panel. Exposed conduit is allowed. | |
| Replacement Standard | |
| If wall finishes are removed, those areas shall be wired to the latest version of local codes (or State Electrical Code). | |

| Service and Panel [MAJOR SYSTEM] | |
|---|--|
| Repair Standard | |
| Each units electrical service shall be circuit breaker type. Service panels shall have a main disconnect, at least 10 circuit-breaker-protected circuits, a 100-amp minimum capacity and be adequate to safely supply existing and proposed devices. If a working central air conditioning system is present, the minimum service shall be 150 amp. | |
| Replacement Standard | |
| Electrical service with a main disconnect panel shall be installed according to local code (or State Electrical Code). | |

10) Plumbing

Note: If there is no local building code, then all plumbing work shall comply with the Colorado Plumbing Code.

| Drain, Waste, Vent Lines [MAJOR SYSTEM] | |
|---|--|
| Repair Standard | |
| The plumbing system shall be vented in a manner that allows the wastewater system to function properly. The waste system shall operate free from fouling, clogging and leaking and shall be capable of safely disposing of wastewater for all plumbing fixtures. All fixtures that discharge wastewater shall contain or be discharged through a trap that prevents the entry of sewer gas into the dwelling. Waste and vent lines shall function without losing the trap seal. | |
| Replacement Standard | |
| If walls are removed exposing vent and waste lines, those lines shall be reworked or replaced to the current mechanical code. | |

| Plumbing Fixtures | |
|--|--|
| Repair Standard | |
| All plumbing fixtures shall be free of cracks and defects, and be capable of being used for the purpose in which they were intended. All fixtures and faucets shall have working, drip-free components. | |
| Replacement Standard | |
| Replace fixtures with single lever, metal faucets and shower diverters with 15-year, drip-free warranties. Sinks should be replaced with stainless steel sinks, and new tub surrounds should be of fiberglass. | |
| [GREEN STANDARD] Toilets with greater than a 1.6 GPF rating shall be replaced with a 1.3 GPF model. Faucets and shower diverters should have a maximum 2.0 GPM flow. | |

| Plumbing Minimum Equipment (MAJOR SYSTEM) | |
|--|--|
| Repair Standard | |
| All existing equipment shall be operational and leak free. | |
| Minimum Standard | |
| All existing equipment shall be operational and leak free. Every dwelling unit shall have a minimum of one single bowl sink with hot and cold running water in the kitchen and at least one bathroom containing a vanity with a sink (or pedestal sink), and a shower/tub unit, both with hot and cold running water, and a toilet. An operable water shut off valve, that completely stops the flow of water, shall be present at each water supply line to sinks/lavatories, toilets, washing machines and water heaters. Each unit shall have an adequate continuous supply of hot water either through a minimum 40 gallon water heater or on demand water heater in the unit or through a common boiler or hot water supply for the building. Each building shall have installed at least one exterior freeze protected faucet. | |

| Water Heaters (MAJOR SYSTEM) | |
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| Repair Standard | |
| Each housing unit shall be supplied with hot water either from a common source such as building-wide boiler system or from per-unit water heating equipment. Hot water supply lines shall be free of leaks and all water heating equipment shall be safe, of adequate capacity, free of corrosion and water damage, faulty operation, fire, carbon monoxide leakage and other hazards. | |
| Replacement Standard | |
| Hot water systems that are replaced shall be of adequate capacity, be installed per manufacturer's specifications and meet local codes (orIEBC). | |
| [GREEN STANDARD] High efficiency power-vented or sealed combustion tankless models are allowed. | |

| Water Supply [MAJOR SYSTEM] | |
|--|--|
| Repair Standard | |
| The main shut off valve shall be operable and completely stop the flow of water to the house. If there is no existing shut-off valve, then one shall be installed. All fixtures shall be leak-free and deliver sufficient cold water and, where applicable, hot water. All lead supply pipes present shall be completely removed and replaced. | |
| Replacement Standard | |
| The main shut off valve shall be operable and completely stop the flow of water to the house, and should be replaced if it does not. Lead and galvanized pipe that is part of the water service or the distribution system shall be replaced with copper, PEX or other plastic approved for distribution of domestic water. All fixtures shall have brass shut off valves. | |

11) HVAC

| Air Conditioning [MAJOR SYSTEM] [GREEN STANDARD] | |
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| Repair Standard | |
| Existing air conditioners and evaporative coolers shall be inspected, serviced and refurbished to operate safely. Non-functioning, non-repairable air conditioners and evaporative coolers shall be removed and drained of all CFCs. | |
| Replacement Standard | |
| New air conditioning or evaporative cooling units shall be of adequate capacity, and reasonably durable and economical to operate. Any air conditioning or evaporative cooling systems shall be installed in accordance with manufacturer's installation specifications. | |

| Chimney [MAJOR SYSTEM] | |
|--|--|
| Repair Standard | |
| Unused chimneys shall be removed to below the roof line wherever roofing is replaced. Chimneys shall be in good repair and high enough to induce a draft that shall keep smoke from being allowed into the dwelling. Existing unlined masonry chimneys used for combustion ventilation shall be lined or corrosion resistant pipe shall be added to the interior of the chimney. | |

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| Replacement Standard | |
| The creation of new flues is not recommended - the use of high efficiency closed combustion appliances is recommended to avoid the need for new flues. Replacement flues, when required, shall be installed according to the fuel burning unit manufacturer's installation specifications. | |

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| Distribution System [MAJOR SYSTEM] | |
| Repair Standard | |
| Duct work and radiator piping shall be well supported, insulated in unconditioned space and adequate to maintain a comfortable temperature in all habitable and essential rooms. | |
| [GREEN STANDARD] All duct work in unconditioned space should be insulated to R-7, sealed at all seams with mastic (not tape) and pressure tested to eliminate leakage. | |
| Replacement Standard | |
| All duct work in unconditioned space shall be insulated to R-7, sealed at all seams with mastic (not tape), pressure tested to eliminate leakage and run in concealed space. | |

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| Heating [MAJOR SYSTEM] | |
| Repair Standard | |
| All heating equipment shall be safe, of adequate capacity, free of corrosion and water damage, faulty operation, fire, carbon dioxide leakage and other hazards. Filters shall be secure, clean and large enough to pass sufficient recirculated air to make the unit operate properly. Equipment housings and access panels shall be intact and properly secured/installed with no exposed electrical connections, belts, pulleys, or blowers. | |
| Replacement Standard | |
| Gas-fired heating plants shall be rated at $\geq 92\%$ AFUE or better, to the extent possible. Heat pumps shall be rated at ≥ 15 SEER. No Oil fired heating plants shall be installed and the oil heating system, including tanks and fuel lines, shall be completely removed before being replaced with new gas or electric systems. Setback thermostats may be installed. When electric resistance heating systems are replaced, soffits for ductwork and/or new distribution pipes for hot water heating systems shall be provided. Up to 4 lineal feet of resistance electric heating strips per 1000 square feet of floor area may be retained or installed in areas that are not cost effective to heat via ductwork or hot water distribution systems. All heating equipment shall be installed as per manufacturer' installation specifications and local codes (or IEBC). | |

| Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation | | |
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| NOTE: Observable Deficiencies in *Bold Italic are considered life-threatening and must be addressed immediately, if the housing is occupied. | | |
| Inspectable Item | Observable Deficiency | Type and Degree of Deficiency that must be addressed |
| Requirements for Site | | |
| Fencing and Gates | Damaged/Falling/Leaning | Fence or gate is so damaged that it does not function as it should |
| | Holes | Hole in fence or gate is larger than 6 inches by 6 inches |
| | Missing Sections | An exterior fence, security fence or gate is missing a section which could threaten safety or security |
| Grounds | Erosion/Rutting Areas | Runoff has extensively displaced soils which has caused visible damage or potential failure to adjoining structures or systems and potentially threatens the safety of pedestrians |
| | Overgrown/Penetrating Vegetation | Plants have visibly damaged a component, area or system of the property or has made them unusable or unpassable |
| | Ponding/Site Drainage | There is an accumulation of more than 5 inches deep or a large section of the grounds-more than 20%-is unusable for it's intended purpose |
| Health & Safety | Air Quality - Sewer Odor Detected | Detectable sewer odors that could pose a health risk if inhaled for prolonged periods |
| | *Air Quality - Propane/Natural Gas/Methane Gas Detected | Detectable strong propane, natural gas or methane gas odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled |
| | *Electrical Hazards - Exposed Wires/Open Panels | Exposed bare wires or openings in electrical panels (capped wires do not pose a risk) |
| | *Electrical Hazards - Water Leaks on/near Electrical Equipment | Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion |
| | *Flammable Materials - Improperly Stored | Flammable materials are improperly stored, causing the potential risk of fire or explosion |
| | Garbage and Debris - Outdoors | Too much garbage has gathered-more than the planned storage capacity, or garbage has gathered in an area not sanctioned for staging or storing garbage or debris |
| | Hazards - Other | General defects or hazards that pose risk of bodily injury |
| Hazards - Sharp Edges | Hazards - Sharp Edges | Physical defects that could cause cutting or breaking of human skin or other bodily harm |
| | Hazards - Tripping | Physical defects in walkways or other travelled area that poses a tripping risk |
| | Infestation - Insects | Evidence of infestation of insects-including roaches and ants-throughout a unit or room, especially in food preparation and storage areas |
| | Infestation - Rats/Mice/Vermin | Evidence of rats or mice-sightings, rat or mouse holes, or droppings |
| Mailboxes/Project Signs | Mailbox Missing/Damaged | The U.S. Postal Service resident/unit mailbox cannot be locked or is missing |
| | Signs Damaged | The sign is damaged, vandalized, or deteriorated, and cannot be read from a reasonable distance |
| Parking Lots/Driveways/Roads | Cracks | Cracks greater than ¼ inch, hinging/tilting, or missing section(s) that affect traffic ability over more than 5% of the property's parking lots/driveways/roads or if a height differential could cause a tripping or falling hazard |
| | Ponding | 3 inches or more of water has accumulated making 5% or more of a parking lot/driveway unusable or unsafe |
| | Potholes/Loose Material | Potholes or loose material that have made a parking lot/driveway unusable/unpassable for vehicles and/or pedestrians or could cause tripping or falling |
| | Settlement/Heaving | Settlement/heaving has made a parking lot/driveway unusable/unpassable or creates unsafe conditions for pedestrians and vehicles |
| Play Areas and Equipment | Damaged/Broken Equipment | More than 20% of the equipment does not operate as it should or equipment that poses a threat to safety and could cause injury |
| | Deteriorated Play Area Surface | More than 20% of the play surface area shows deterioration or the play surface area could cause tripping or falling and thus poses a safety risk |
| Refuse Disposal | Broken/Damaged Enclosure-Inadequate Outside Storage Space | A single wall or gate of the enclosure has collapsed or is leaning and in danger of falling or trash cannot be stored in the designated area because it is too small to store refuse until disposal |
| Retaining Walls | Damaged/Falling/Leaning | A retaining wall is damaged and does not function as it should or is a safety risk The system is partially or completely blocked by a large quantity of debris, causing backup into adjacent areas or runoffs into areas where runoff is not intended |
| Storm Drainage | Damaged/Obstructed | |
| Walkways/Steps | Broken/Missing Hand Railing | The hand rail is missing, damaged, loose or otherwise unusable |
| | Cracks/Settlement/Heaving | Cracks greater than 3/4", hinging/tilting or missing sections that affect traffic ability over more than 5% of the property's walkways/steps or any defect that creates a tripping or falling hazard |
| | Spalling/Exposed rebar | More than 5% of walkways have large areas of spalling--larger than 4 inches by 4 inches--and this affects traffic ability |
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| Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation | | |
|--|---|--|
| NOTE: Observable Deficiencies in *Bold Italic are considered life-threatening and must be addressed immediately, if the housing is occupied. | | |
| Inspectable Item | Observable Deficiency | Type and Degree of Deficiency that must be addressed |
| Requirements for Building Exterior | | |
| Doors | Damaged Frames/Threshold/Lintels/Trim | Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim |
| | Damaged Hardware/Locks | Any door that does not function as it should or cannot be locked because of damage to the door's hardware |
| | Damaged Surface (Holes/Paint/Rusting/Glass) | Any door that has a hole or holes larger than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass |
| | Damaged/Missing Screen/Storm/Security Door | Any screen door or storm door that is damaged or is missing screens or glass--shown by an empty frame or frames or any security door that is not functioning or is missing |
| | Deteriorated/Missing Caulking/Seals | The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should |
| Fire Escapes | Missing Door | Any exterior door that is missing |
| | *Blocked Egress/Ladders | Stored items or other barriers restrict or block people from exiting |
| Foundations | Visibly Missing Components | Any of the functional components that affect the function of the fire escape--one section of a ladder or railing, for example--are missing |
| | Cracks/Gaps | Large cracks or gaps in foundation more than 3/8 inches wide by 3/8 inches deep by 6 inches long that present a possible sign of a serious structural problem, or opportunity for water penetration or sections of wall or floor that are broken apart |
| | Spalling/Exposed Rebar | Significant spalled areas affecting more than 10% of any foundation wall or any exposed reinforcing material--rebar or other |
| Health and Safety | *Electrical Hazards - Exposed Wires/Open Panels | Exposed bare wires or openings in electrical panels (capped wires do not pose a risk) |
| | *Electrical Hazards - Water Leaks on/near Electrical Equipment | Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion |
| | *Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable | The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit |
| | *Emergency Fire Exits - Missing Exit Signs | Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign |
| | *Flammable/Combustible Materials - Improperly Stored | Flammable materials are improperly stored, causing the potential risk of fire or explosion |
| | Garbage and Debris - Outdoors | Too much garbage has gathered--more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris |
| | Hazards - Other | General defects or hazards that pose risk of bodily injury |
| | Hazards - Sharp Edges | Physical defects that could cause cutting or breaking of human skin or other bodily harm |
| | Hazards - Tripping | Physical defects in walkways or other travelled area that poses a tripping risk |
| | Infestation - Insects | Evidence of infestation of insects--including roaches and ants--throughout a unit or room, especially in food preparation and storage areas |
| Lighting | Infestation - Rats/Mice/Vermin | Evidence of rats or mice--sightings, rat or mouse holes, or droppings |
| | Broken Fixtures/Bulbs | Lighting fixtures and bulbs are broken or missing |
| Roofs | Damaged Soffits/Fascia | Soffits or fascia that should be there are missing or so damaged that water penetration is visibly possible |
| | Damaged Vents | Vents are missing or so visibly damaged that further roof damage is possible |
| | Damaged/Clogged Drains | The drain is so damaged or clogged with debris that the drain no longer functions--as shown by ponding |
| | Damaged/Torn Membrane/Missing Ballast | Ballast has shifted and no longer functions as it should or there is damage to the roof membrane that may result in water penetration |
| | Missing/Damaged Components from Downspout/Gutter | Drainage system components are missing or damaged causing visible damage to the roof, structure, exterior wall surface, or interior |
| | Missing/Damaged Shingles | Shingles are missing or damaged, including cracking, warping, cupping, and other deterioration |
| | Ponding | Evidence of standing water on roof, causing potential or visible damage to roof surface or underlying materials |
| Walls | Cracks/Gaps | Large cracks or gaps that are more than 3/8 inches wide or deep and 6 inches long that presents a possible sign of serious structural problem or opportunity for water penetration |
| | Damaged Chimneys | Part or all of the chimney has visibly separated from the adjacent wall or there are cracked or missing pieces large enough to present a sign of chimney failure or there is a risk of falling pieces that could create a safety hazard |
| | Missing/Damaged Caulking/Mortar | Caulking or glazing compound that resists weather is missing or deteriorated |
| | Missing Pieces/Holes/Spalling | Exterior wall deterioration or holes of any size that present a risk of water penetration or risk of structural damage |
| | Stained/Peeling/Needs Paint | Paint is cracking, flaking, or otherwise deteriorated. Water damage or related problems have stained the paint |

| Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation | | |
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| NOTE: Observable Deficiencies in <i>*Bold Italic</i> are considered life-threatening and must be addressed immediately, if the housing is occupied. | | |
| Inspectable Item | Observable Deficiency | Type and Degree of Deficiency that must be addressed |
| Windows | Broken/Missing/Cracked Panes | Missing or cracked panes of glass |
| | Damaged Sills/Frames/Lintels/Trim | Window sills, frames, sash lintels, or trim are damaged by decay, rust, rot, corrosion, or other deterioration |
| | Damaged/Missing Screens | Missing screens or screens are punctured, torn or otherwise damaged |
| | Missing/Deteriorated Caulking/Seals/Glazing Compound | Caulking or seals that resists weather is missing or deteriorated |
| | Peeling/Needs Paint | Paint covering the window assembly or trim is cracking, flaking, or otherwise failing |
| | *Security Bars Prevent Egress | The ability to exit through egress window is limited by security bars that do not function properly and, therefore, pose safety risks |
| Requirements for Building Systems | | |
| Inspectable Item | Observable Deficiency | Type and Degree of Deficiency that must be addressed |
| Domestic Water | Leaking Central Water Supply | Leaking water from water supply line is observed |
| | Missing Pressure Relief Valve | No pressure relief valve or pressure relief valve does not drain down to the floor |
| | Rust/Corrosion on Heater Chimney | Water heater chimney shows evidence of flaking, discoloration, pitting, or crevices that may create holes that could allow toxic gases to leak from the chimney |
| | Water Supply Inoperable | No running water in any area of the building where there should be |
| Electrical System | Blocked Access/Improper Storage | One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency |
| | Burnt Breakers | Carbon residue, melted breakers or arcing scars are evident |
| | Evidence of Leaks/Corrosion | Corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures, or any evidence of water leaks in the enclosure or hardware |
| | Frayed Wiring | Nicks, abrasion, or fraying of the insulation that exposes any conducting wire |
| | Missing Breakers/Fuses | Open and/or exposed breaker port |
| | *Missing Outlet Covers | A cover is missing, which results in exposed visible electrical connections |
| Elevators | Not Operable | Elevator does not function at all or the elevator doors open when the cab is not there |
| Emergency Power | Auxiliary Lighting Inoperable (if applicable) | Auxiliary lighting does not function |
| Fire Protection | Missing Sprinkler Head | Any sprinkler head is missing, visibly disabled, painted over, blocked, or capped |
| | *Missing/Damaged/Expired Extinguishers | Missing, damaged or expired fire extinguisher in any area of the building where a fire extinguisher is required |
| Health & Safety | Air Quality - Mold and/or Mildew Observed | Evidence of mold or mildew is observed that is substantial enough to pose a health risk |
| | *Air Quality - Propane/Natural Gas/Methane Gas Detected | Detectable strong propane, natural gas or methane gas odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled |
| | Air Quality - Sewer Odor Detected | Detectable sewer odors that could pose a health risk if inhaled for prolonged periods |
| | Electrical Hazards - Exposed Wires/Open Panels | Exposed bare wires or openings in electrical panels (capped wires do not pose a risk) |
| | *Electrical Hazards - Water Leaks on/near Electrical Equipment | Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion |
| | Elevator - Tripping | Elevator is misaligned with the floor by more than 3/4 of an inch. The elevator does not level as it should, which causes a tripping hazard |
| | *Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable | The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit |
| | *Emergency Fire Exits - Missing Exit Signs | Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign |
| | *Flammable Materials - Improperly Stored | Flammable materials are improperly stored, causing the potential risk of fire or explosion |
| | | Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris |
| HVAC | Garbage and Debris - Indoors | |
| | Hazards - Other | General defects or hazards that pose risk of bodily injury |
| | Hazards - Sharp Edges | Physical defects that could cause cutting or breaking of human skin or other bodily harm |
| | Hazards - Tripping Hazards | Physical defects in walkways or other travelled area that poses a tripping risk |
| | Infestation - Insects | Evidence of infestation of insects-including roaches and ants-throughout a unit or room, especially in food preparation and storage areas |
| | Infestation - Rats/Mice/Vermin | Evidence of rats or mice--sightings, rat or mouse holes, or droppings |
| | Boiler/Pump Leaks | Evidence of water or steam leaking in piping or pump packing |
| | Fuel Supply Leaks | Evidence of any amount of fuel leaking from the supply tank or piping |
| | General Rust/Corrosion | Significant formations of metal oxides, significant flaking, discoloration, or the development of a noticeable pit or crevice |

| Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation | | |
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| NOTE: Observable Deficiencies in <i>*Bold Italic</i> are considered life-threatening and must be addressed immediately, if the housing is occupied. | | |
| Inspectable Item | Observable Deficiency | Type and Degree of Deficiency that must be addressed |
| | <i>*Misaligned Chimney/Ventilation System</i> | A misalignment of an exhaust system on a combustion fuel-fired unit (oil, natural gas, propane, wood pellets etc.) that causes improper or dangerous venting of gases |
| Roof Exhaust System | Roof Exhaust Fan(s) Inoperable | Roof exhaust fan unit does not function |
| Sanitary System | Broken/Leaking/Clogged Pipes or Drains | Evidence of active leaks in or around the system components or evidence of standing water, puddles or ponding--a sign of leaks or clogged drains |
| | Missing Drain/Cleanout/Manhole Covers | A protective cover is missing |
| Requirements for Common Areas | | |
| Inspectable Item | Observable Deficiency | Type and Degree of Deficiency that must be addressed |
| Basement/Garage/Carport | Baluster/Side Railings - Damaged | Damaged or missing balusters or side rails that limit the safe use of an area |
| Closet/Utility/Mechanical | Cabinets - Missing/Damaged | Cabinets are missing or the laminate is separating. This includes cases, boxes, or pieces of furniture with drawers, shelves, or doors--primarily used for storage--mounted on walls or floors |
| Community Room | Call for Aid - Inoperable | The system does not function as it should |
| Halls/Corridors/Stairs | Ceiling - Holes/Missing Tiles/Panels/Cracks | Ceiling surface has punctures that may or may not penetrate completely or panels or tiles are missing |
| Kitchen | Ceiling - Peeling/Needs Paint | Paint is peeling, cracking, flaking, or otherwise deteriorated on ceilings in common areas |
| Laundry Room | Ceiling - Water Stains/Water Damage/Mold/Mildew | Evidence of water infiltration, mold, or mildew that may have been caused by saturation or surface failure |
| Lobby | Countertops - Missing/Damaged | Flat work surface in a kitchen often integral to lower cabinet space is missing or deteriorated or damaged below the laminate |
| Office | Dishwasher/Garbage Disposal - Inoperable | Dishwasher or garbage disposal does not operate as it should |
| Other Community Spaces | Doors - Damaged Frames/Threshold/Lintels/Trim | Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim |
| | Patio/Porch/Balcony | Doors - Damaged Hardware/Locks |
| Restrooms | Doors - Damaged Surface (Holes/Paint/Rust/Glass) | Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass |
| Storage | Doors - Damaged/Missing Screen/Storm/Security Door | Any screen door or storm door that is damaged or is missing screens or glass--shown by an empty frame or frames or any security door that is not functioning or is missing |
| | Doors - Deteriorated/Missing Seals (Entry Only) | The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should |
| | Doors - Missing Door | Any door that is missing that is required for the functional use of the space |
| | Dryer Vent -Missing/Damaged/Inoperable | Dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside |
| | Electrical - Blocked Access to Electrical Panel | One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency |
| | Electrical - Burnt Breakers | Carbon residue, melted breakers or arcing scars are evident |
| | Electrical - Evidence of Leaks/Corrosion | Corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidence of water leaks in the enclosure or hardware |
| | Electrical - Frayed Wiring | Nicks, abrasion, or fraying of the insulation that exposes any conducting wire |
| | Electrical - Missing Breakers | Open and/or exposed breaker port |
| | <i>*Electrical - Missing Covers</i> | A cover is missing, which results in exposed visible electrical connections |
| | Floors - Bulging/Buckling | Flooring that is bulging, buckling or sagging or a problem with alignment between flooring types |
| | Floors - Floor Covering Damaged | Floor covering has stains, surface burns, cuts, holes, tears, loose areas or exposed seams |
| | Floors - Missing Floor/Tiles | Flooring or tile flooring that is missing |
| | Floors - Peeling/Needs Paint | Painted flooring that has peeling or missing paint |
| | Floors - Rot/Deteriorated Subfloor | Rotted or deteriorated subflooring |
| | Floors - Water Stains/Water Damage/Mold/Mildew | Evidence of water infiltration, mold, or mildew that may have been caused by saturation or surface failure |
| | GFI - Inoperable | The GFI does not function |
| | Graffiti | Graffiti on any exposed surface greater than 6 inches by 6 inches |
| | HVAC - Convection/Radiant Heat System Covers Missing/Damaged | Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans |
| | HVAC - General Rust/Corrosion | Significant formations of metal oxides, flaking, or discoloration--or a pit or crevice |
| | HVAC - Inoperable | HVAC does not function. It does not provide the heating and cooling it should. The system does not respond when the controls are engaged |
| | <i>*HVAC - Misaligned Chimney/Ventilation System</i> | Any misalignment that may cause improper or dangerous venting of gases |
| | HVAC - Noisy/Vibrating/Leaking | HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged |
| | Lavatory Sink - Damaged/Missing | Sink, faucet, or accessories are missing, damaged, or not functioning |

| Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation | | |
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| NOTE: Observable Deficiencies in <i>*Bold Italic</i> are considered life-threatening and must be addressed immediately, if the housing is occupied. | | |
| Inspectable Item | Observable Deficiency | Type and Degree of Deficiency that must be addressed |
| | Lighting - Missing/Damaged/Inoperable Fixture | Permanent light fixtures are missing or not functioning, and no other switched light source is functioning in the room |
| | Mailbox - Missing/Damaged | The U.S Postal Service mailbox cannot be locked or is missing |
| | *Outlets/Switches/Cover Plates - Missing/Broken | Outlet or switch is missing or a cover plate is missing or broken, resulting in exposed wiring |
| | Pedestrian/Wheelchair Ramp | Walkway or ramp is damaged and cannot be used by people on foot, in wheelchair, or using walkers |
| | Plumbing - Clogged Drains | Drain is substantially or completely clogged or has suffered extensive deterioration |
| | Plumbing - Leaking Faucet/Pipes | A steady leak that is adversely affecting the surrounding area |
| | Range Hood /Exhaust Fans - Excessive Grease/Inoperable | Apparatus that draws out cooking exhaust does not function as it should and/or accumulation of dirt threatens the free passage of air |
| | Range/Stove - Missing/Damaged/Inoperable | One or more burners are not functioning or doors or drawers are impeded or on gas ranges pilot is out and/or flames are not distributed equally or oven not functioning |
| | Refrigerator - Damaged/Inoperable | Refrigerator is missing or does not cool adequately for the safe storage of food |
| | Restroom Cabinet - Damaged/Missing | Damaged or missing shelves, vanity top, drawers, or doors that are not functioning as they should for storage or their intended purpose |
| | Shower/Tub - Damaged/Missing | Shower, tub, or components are damaged or missing |
| | Sink - Missing/Damaged | Sink, faucet, or accessories are missing, damaged, or not functioning |
| | *Smoke Detector - Missing/Inoperable | Smoke detector is missing or does not function as it should |
| | Stairs - Broken/Damaged/Missing Steps | A step is missing or broken |
| | Stairs - Broken/Missing Hand Railing | Hand rail is missing, damaged, loose or otherwise unusable |
| | Ventilation/Exhaust System - Inoperable | Exhaust fan is not functioning or window designed for ventilation does not open |
| | Walls - Bulging/Buckling | Bulging, buckling or sagging walls or a lack of horizontal alignment |
| | Walls - Damaged | Punctures in the wall surface that may or may not penetrate completely |
| | Walls - Damaged/Deteriorated Trim | Cove molding, chair rail, base molding, or other decorative trim is damaged or has decayed |
| | Walls - Peeling/Needs Paint | Paint is peeling, cracking, flaking, or otherwise deteriorated |
| | Walls - Water Stains/Water Damage/Mold/Mildew | Evidence of water infiltration, mold, or mildew--or damage caused by saturation or surface failure |
| | Water Closet/Toilet - Damaged/Clogged/Missing | Fixture elements--seat, flush handle, cover etc.--are missing or damaged or the toilet seat is cracked or has a broken hinge or toilet cannot be flushed |
| | Windows - Cracked/Broken/Missing Panes | Missing or cracked panes of glass |
| | Windows - Damaged Window Sill | Sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness |
| | Windows - Inoperable/Not Lockable | Window that is not functioning or cannot be secured because lock is broken |
| | Windows - Missing/Deteriorated Caulking/Seals/Glazing Compound | Caulking or seals that resists weather is missing or deteriorated |
| | Windows - Peeling/Needs Paint | Paint covering the window assembly or trim is cracking, flaking, or otherwise failing |
| | *Windows - Security Bars Prevent Egress | The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks |
| Health & Safety | Air Quality - Mold and/or Mildew Observed | Evidence of mold or mildew is observed that is substantial enough to pose a health risk |
| | *Air Quality - Propane/Natural Gas/Methane Gas Detected | Detectable strong propane, natural gas or methane gas odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled |
| | Air Quality - Sewer Odor Detected | Detectable sewer odors that could pose a health risk if inhaled for prolonged periods |
| | *Electrical Hazards - Exposed Wires/Open Panels | Exposed bare wires or openings in electrical panels (capped wires do not pose a risk) |
| | *Electrical Hazards - Water Leaks on/near Electrical Equipment | Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion |
| | *Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable | The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit |
| | *Emergency Fire Exits - Missing Exit Signs | Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign |
| | *Flammable/Combustible Materials - Improperly Stored | Flammable or combustible materials are improperly stored, causing the potential risk of fire or explosion |
| | Garbage and Debris - Indoors | Too much garbage has gathered--more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris |
| | Garbage and Debris - Outdoors | Too much garbage has gathered--more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris |
| | Hazards - Other | General defects or hazards that pose risk of bodily injury |
| | Hazards - Sharp Edges | Physical defects that could cause cutting or breaking of human skin or other bodily harm |

| Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation | | |
|--|---|--|
| NOTE: Observable Deficiencies in *Bold Italic are considered life-threatening and must be addressed immediately, if the housing is occupied. | | |
| Inspectable Item | Observable Deficiency | Type and Degree of Deficiency that must be addressed |
| | Hazards - Tripping | Physical defects in walkways or other travelled area that poses a tripping risk |
| | Infestation - Insects | Evidence of infestation of insects-including roaches and ants-throughout a unit or room, especially in food preparation and storage areas |
| | Infestation - Rats/Mice/Vermin | Evidence of rats or mice--sightings, rat or mouse holes, or droppings |
| Pools and Related Structures | Fencing - Damaged/Not Intact | Damage that could compromise the integrity of the fence |
| Trash Collection Areas | Chutes - Damaged/Missing Components | Garbage has backed up into chutes, because the collection structure is missing or broken or compactors or components--chute, chute door, and other components--have failed |
| Requirements for Unit | | |
| Inspectable Item | Observable Deficiency | Type and Degree of Deficiency that must be addressed |
| Bathroom | Bathroom Cabinets - Damaged/Missing | Damaged or missing shelves, vanity tops, drawers, or doors that are not functioning as they should for storage or their intended purpose |
| | Lavatory Sink - Damaged/Missing | Sink, faucet, or accessories are missing, damaged, or not functioning |
| | Plumbing - Clogged Drains, Faucets | Drain or faucet is substantially or completely clogged or has suffered extensive deterioration |
| | Plumbing - Leaking Faucet/Pipes | A steady leak that is adversely affecting the surrounding area |
| | Shower/Tub - Damaged/Missing | Shower, tub, or components are damaged or missing |
| | Ventilation/Exhaust System – Absent/Inoperable | Exhaust fan is not functioning or window designed for ventilation does not open |
| | Water Closet/Toilet - Damaged/Clogged/Missing | Fixture elements--seat, flush handle, cover etc.--are missing or damaged or the toilet seat is cracked or has a broken hinge or toilet cannot be flushed |
| Call-for-Aid (if applicable) | Inoperable | The system does not function as it should |
| Ceiling | Bulging/Buckling/Leaking | Ceiling is bowed, deflected, sagging, or is no longer aligned horizontally |
| | Holes/Missing Tiles/Panels/Cracks | Ceiling surface has punctures that may or may not penetrate completely or panels or tiles are missing |
| | Peeling/Needs Paint | Paint is peeling, cracking, flaking, or otherwise deteriorated on ceilings in common areas |
| | Water Stains/Water Damage/Mold/Mildew | Evidence of water infiltration, mold, or mildew that may have been caused by saturation or surface failure |
| Doors | Damaged Frames/Threshold/Lintels/Trim | Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim |
| | Damaged Hardware/Locks | Any door that does not function as it should or cannot be locked because of damage to the door's hardware |
| | Damaged/Missing Screen/Storm/Security Door | Any screen door or storm door that is damaged or is missing screens or glass--shown by an empty frame or frames or any security door that is not functioning or is missing |
| | Damaged Surface - Holes/Paint/Rusting/Glass/Rotting | Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass |
| | Deteriorated/Missing Seals (Entry Only) | The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should |
| | Missing Door | Any door that is required for security (entry) or privacy (Bathroom) that is missing or any other unit door that is missing and is required for proper unit functionality |
| Electrical System | Blocked Access to Electrical Panel | One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency |
| | Burnt Breakers | Carbon residue, melted breakers or arcing scars are evident |
| | Evidence of Leaks/Corrosion | Corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidence of water leaks in the enclosure or hardware |
| | Frayed Wiring | Nicks, abrasion, or fraying of the insulation that exposes any conducting wire |
| | GFI - Inoperable | The GFI does not function |
| | Missing Breakers/Fuses | Open and/or exposed breaker port |
| | *Missing Covers | A cover is missing, which results in exposed visible electrical connections |
| Floors | Bulging/Buckling | Flooring that is bulging, buckling or sagging or a problem with alignment between flooring types |
| | Floor Covering Damage | Floor covering has stains, surface burns, cuts, holes, tears, loose areas or exposed seams |
| | Missing Flooring Tiles | Flooring or tile flooring that is missing |
| | Peeling/Needs Paint | Painted flooring that has peeling or missing paint |
| | Rot/Deteriorated Subfloor | Rotted or deteriorated subflooring |
| | Water Stains/Water Damage/Mold/Mildew | Evidence of water infiltration, mold, or mildew that may have been caused by saturation or surface failure |
| Health & Safety | Air Quality - Mold and/or Mildew Observed | Evidence of mold or mildew is observed that is substantial enough to pose a health risk |
| | Air Quality - Sewer Odor Detected | Detectable sewer odors that could pose a health risk if inhaled for prolonged periods |

| Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation | | |
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| | *Air Quality - Propane/Natural Gas/Methane Gas Detected | Detectable strong propane, natural gas or methane gas odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled |
| | *Electrical Hazards - Exposed Wires/Open Panels | Exposed bare wires or openings in electrical panels (capped wires do not pose a risk) |
| | *Electrical Hazards - Water Leaks on/near Electrical Equipment | Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion |
| | *Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable | The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit |
| | *Emergency Fire Exits - Missing Exit Signs | Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign |
| | *Flammable Materials - Improperly Stored | Flammable materials are improperly stored, causing the potential risk of fire or explosion |
| | Garbage and Debris - Indoors | Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris |
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| | Hazards - Other | General defects or hazards that pose risk of bodily injury |
| | Hazards - Sharp Edges | Physical defects that could cause cutting or breaking of human skin or other bodily harm |
| | Hazards - Tripping | Physical defects in walkways or other travelled area that poses a tripping risk |
| | Infestation - Insects | Evidence of infestation of insects-including roaches and ants-throughout a unit or room, especially in food preparation and storage areas |
| | Infestation - Rats/Mice/Vermin | Evidence of rats or mice--sightings, rat or mouse holes, or droppings |
| Hot Water Heater | *Misaligned Chimney/Ventilation System | Misalignment that may cause improper or dangerous venting of gases |
| | Inoperable Unit/Components | Hot water from hot water taps is no warmer than room temperature indicating hot water heater is not functioning properly |
| | Leaking Valves/Tanks/Pipes | Evidence of active water leaks from hot water heater or related components |
| | Pressure Relief Valve Missing | There is no pressure relief valve or pressure relief valve does not drain down to the floor |
| | Rust/Corrosion | Significant formations of metal oxides, flaking, or discoloration--or a pit or crevice |
| HVAC System | Convection/Radiant Heat System Covers Missing/Damaged | Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans |
| | Inoperable | HVAC does not function. It does not provide the heating and cooling it should. The system does not respond when the controls are engaged |
| | Misaligned Chimney/Ventilation System | Misalignment that may cause improper or dangerous venting of gases |
| | Noisy/Vibrating/Leaking | HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged |
| | Rust/Corrosion | Deterioration from rust or corrosion on the HVAC system in the dwelling unit |
| Kitchen | Cabinets - Missing/Damaged | Cabinets are missing or the laminate is separating. This includes cases, boxes, or pieces of furniture with drawers, shelves, or doors--primarily used for storage--mounted on walls or floors |
| | Countertops - Missing/Damaged | Flat work surface in a kitchen often integral to lower cabinet space is missing or deteriorated or damaged below the laminate |
| | Dishwasher/Garbage Disposal - Inoperable | Dishwasher or garbage disposal does not operate as it should |
| | Plumbing - Clogged Drains | Drain is substantially or completely clogged or has suffered extensive deterioration |
| | Plumbing - Leaking Faucet/Pipes | A steady leak that is adversely affecting the surrounding area |
| | Range Hood/Exhaust Fans - Excessive Grease/Inoperable | Apparatus that draws out cooking exhaust does not function as it should and/or accumulation of dirt threatens the free passage of air |
| | Range/Stove - Missing/Damaged/Inoperable | One or more burners are not functioning or doors or drawers are impeded or on gas ranges pilot is out and/or flames are not distributed equally or oven not functioning |
| | Refrigerator-Missing/Damaged/Inoperable | Refrigerator is missing or does not cool adequately for the safe storage of food |
| | Sink - Damaged/Missing | Sink, faucet, or accessories are missing, damaged, or not functioning |
| Laundry Area (Room) | Dryer Vent - Missing/Damaged/Inoperable | Dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside |
| Lighting | Missing/Inoperable Fixture | Permanent light fixtures are missing or not functioning, and no other switched light source is functioning in the room |
| Outlets/Switches | Missing | An outlet or switch is missing |
| | *Missing/Broken Cover Plates | An outlet or switch has a broken cover plate over a junction box or the cover plate is missing |
| Patio/Porch/Balcony | Baluster/Side Railings Damaged | Damaged or missing balusters or side rails that limit the safe use of an area |
| Smoke Detector | *Missing/Inoperable | Smoke detector is missing or does not function as it should |
| Stairs | Broken/Damaged/Missing Steps | A step is missing or broken |

| Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation | | |
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| NOTE: Observable Deficiencies in <i>*Bold Italic</i> are considered life-threatening and must be addressed immediately, if the housing is occupied. | | |
| Inspectable Item | Observable Deficiency | Type and Degree of Deficiency that must be addressed |
| | Broken/Missing Hand Railing | Hand rail is missing, damaged, loose or otherwise unusable |
| Walls | Bulging/Buckling | Wall is bowed, deflected, sagged, or is no longer vertically aligned |
| | Damaged | Punctures in the wall surface that may or may not penetrate completely |
| | Damaged/Deteriorated Trim | Cove molding, chair rail, base molding, or other decorative trim is damaged or has decayed |
| | Peeling/Needs Paint | Paint is peeling, cracking, flaking, or otherwise deteriorated |
| | Water Stains/Water Damage/Mold/Mildew | Evidence of water infiltration, mold, or mildew--or damage caused by saturation or surface failure |
| Windows | Cracked/Broken/Missing Panes | Missing or cracked panes of glass |
| | Damaged Window Sill | Sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness |
| | Missing/Deteriorated Caulking/Seals/Glazing Compound | Caulking or seals that resists weather is missing or deteriorated |
| | Inoperable/Not Lockable | Window that is not functioning or cannot be secured because lock is broken |
| | Peeling/Needs Paint | Paint covering the window assembly or trim is cracking, flaking, or otherwise falling |
| | <i>*Security Bars Prevent Egress</i> | The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks |

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

N/A

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

For applicants that apply according to Colorado’s top funding priority of supportive housing, preference will be given to potential residents with the targeted special need, such as people experiencing homelessness or people with disabilities.

12. Refinancing of Existing Debt. Enter or attach the grantee’s refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter “N/A.”

N/A

Department of Local Affairs (DOLA), Division of Housing (DOH)
Emergency Solutions Grant (ESG)
Policy and Procedures

The ESG program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless.

Department of Local Affairs, Division of Housing (DOH) has authority to obligate funds per 24 C.F.R 576, funds have been budgeted, appropriated and otherwise made available to eligible recipients, which can be either local government agencies or private nonprofit organizations.

The recipient agencies and organizations which actually run the homeless programs, apply to DOH or the Continuum of Care (COC) and not directly to HUD. DOH will coordinate with the CoC to ensure that priorities are aligned based on local priorities. If the CoC is a recipient of the funding, they are responsible for the compliance and will conduct on-site monitoring reviews for all subrecipients.

1. Preparation of Consolidated Plan or Action Plan updates

- Each year, The DOH prepares either a 5-year Consolidated Plan (CP) or an interim year Consolidated Action Plan detailing existent housing conditions and needs, statistical information and planned activities for ESG in accordance with HUD guidelines.

2. Approval of Consolidated Plan by HUD

- The CP or action plan is reviewed by HUD and suggestions/comments/changes are recommended prior to its approval. Once approved by HUD, a grant agreement is executed between HUD and DOLA.

3. Applications sent to prospective applicants

- Prepare applications
- Instructions
- Attachments to application
- Assurances & Certifications
- Certification of Consistency with Consolidated Plan
- Certification of Local Approval for Nonprofit Organizations
- Required Environmental Review form

4. Applications received and reviewed for completeness and compliance with ESG requirements.

- Applications are assigned a project number and entered into the Oracle tracking system
- Applications examined for compliance with ESG requirements, timeliness, and completeness.
- Applications will be evaluated on the basis of performance measures and data provided

5. Applications/Awards

- Composition of review committee is Homeless Prevention Team, Asset Managers
- DOH will consult with CoC on recommendations made to ensure alignment with local priorities
- Draft award summary and spreadsheet of funding recommendations provided to the Director and Housing Programs Manager
- Awards finalized and recommendations made to DOLA Executive Director
- ESG award letters sent to grantees

6. ESG contracts are drafted and routed through DOLA for approval and execution

7. DOH Monitoring of ESG projects - Monitoring of ESG projects is to be performed by the Asset Manager's over the course of the grant year using the risk based monitoring approach as outlined below.

Risk-based monitoring

- Each grantee is monitored at least once during a three-year period
- Any project that has the following characteristics should be monitored:
- Evidence from payment requests that the agency is not obligating or spending funds in a timely manner;
- New grantee
- Evidence based on complaints, visual inspection that grantee is not providing shelter tha conforms with the requirements or is not performing the funded activities in an appropriate manner.
- Consistent staff turnover

A.Type of Monitoring

- 1.Full Monitoring – On-site review/admintrative review
- 2.Partial - Desk examination of documents by Asset Manager and a self-certification questionnaire signed and notarized by grantee.
- 3.Minimum – Can skip a year
- 4.Performance Measures listed in monitoring document.

8. Contracts between DOLA/DOH and Grantee

Definitions. The following terms as used shall be construed and interpreted as follows:

1.Evaluation

“Evaluation” means the process of examining Grantee’s Work and rating it based on criteria established in §6 and Exhibit B of the ESG Grant.

2.Exhibits and other Attachments

The following are incorporated by reference within the contract:

- Exhibit A (Applicable Laws)
- Exhibit B (Statement of Project)
- Exhibit C (Supplemental Provisions for Federal Funding Accountability and Transparency Act)
- Exhibit D (Rent & Income Limits Table)
- Exhibit E (Project Performance Plan)

3.Goods

“Goods” means tangible material acquired, produced, or delivered by Grantee either separately or in conjunction with the Services Grantee renders hereunder.

4,Grant

“Grant” means this agreement, its terms and conditions, attached exhibits, documents incorporated by reference, and any future modifying agreements, exhibits, attachments or references incorporated herein pursuant to Colorado State law, Fiscal Rules, and State Controller Policies.

5.Grant Funds

“Grant Funds” means available funds payable by the State to Grantee pursuant to this Grant.

6.Party or Parties

“Party” means the State or Grantee and “Parties” means both the State and Grantee.

7.Project Budget

“Project Budget” means the budget for the Work described in Exhibit B of the ESG Grant.

8.Program

“Program” means the grant program, as specified on the first page, that provides the funding for this Grant.

9.Review

“Review” means examining Grantee’s Work to ensure that it is adequate, accurate, correct and in accordance with the criteria established in §6 and Exhibit B of the ESG Grant

10.Services

“Services” means the required services to be performed by Grantee pursuant to this Grant.

11.Subgrantee

“Subgrantee” means third-parties, if any, engaged by Grantee to aid in performance of its obligations.

12.Work

“Work” means the tasks and activities Grantee is required to perform to fulfill its obligations under this Grant and **Exhibit B**, including the performance of the Services and delivery of the Goods.

13.Work Product

“Work Product” means the tangible or intangible results of Grantee’s Work, including, but not limited to, software, research, reports, studies, data, photographs or other finished or unfinished documents, surveys, materials, or work product of any type, including drafts.

14.Continuum of Care (CoC)

“CoC” means to address homelessness through a coordinated community-based process of identifying needs and building a system to address those needs.

15.HMIS Management Information Systems: Data Collection and Evaluation.

Intake, service provision, and program exit data collection as required by HUD and DOH.

9. STATEMENT OF PROJECT

1.Completion

Grantee shall complete the Work and its other obligations as described in Exhibit B of the ESG Grant. The State shall not be liable to compensate Grantee for any Work performed prior to the Effective Date or after the termination of this Grant.

2.Goods and Services

Grantee shall procure Goods and Services necessary to complete the Work. Such procurement shall be accomplished using the Grant Funds and shall not increase the maximum amount payable hereunder by the State.

3.Employees

All persons employed by Grantee or Subgrantees shall be considered Grantee’s or Subgrantees’ employee(s) for all purposes hereunder and shall not be employees of the State for any purpose as a result of this Grant.

10. PAYMENTS TO GRANTEE -The State shall, in accordance with the provisions of the ESG Grant, pay Grantee in the following methods set forth below:

A.Maximum Amount

The maximum amount payable under this Grant to Grantee by the State is determined by the State from available funds. Grantee agrees to provide any additional funds required for the successful completion of the Work. Payments to Grantee are limited to the unpaid obligated balance of the Grant as set forth in Exhibit B of the ESG Grant.

B.Payment

Any payment allowed under the ESG Grant shall comply with State Fiscal Rules and be made in accordance with the provisions of the Grant or such Exhibit. Grantee shall initiate any payment requests by submitting invoices to the State in the form and manner set forth and approved by the State.

1.Interest

The State shall not pay interest on Grantee invoices. The State shall fully pay each invoice within 45 days of receipt thereof if the amount invoiced represents performance by Grantee previously accepted by the State.

2.Available Funds-Contingency-Termination

Payments pursuant to this Grant shall be made only from available funds encumbered for this Grant and the State’s liability for such payments shall be limited to the amount remaining of such encumbered funds. If State or federal funds are not fully appropriated, or otherwise become unavailable for this Grant, the State may immediately terminate the Grant in whole or in part to the extent of funding reduction without further liability in accordance with the provisions herein.

3.Erroneous Payments

At the State’s sole discretion, payments made to Grantee in error for any reason, including, but not limited to overpayments or improper payments, and unexpended or excess funds received by Grantee, may be recovered from Grantee by deduction from subsequent payments under this Grant or other Grants, grants or agreements between the State and Grantee or by other appropriate methods and collected as a debt due to the State. Such funds shall not be paid to any person or entity other than the State.

C. Use of Funds

Grant Funds shall be used only for eligible costs identified Exhibit B of the ESG contract.

D. Matching/Leveraged Funds

Grantee shall provide matching and/or leveraged funds per 24 CFR 576.500 (o), recordkeeping of the source and use of ESG matching contributions.

11. REPORTING-NOTIFICATION - Reports, Evaluations, and Reviews required shall be in accordance with the procedures and in such form as prescribed by the State and HUD.

1. Performance, Progress, Personnel, and Funds

Grantee shall submit a report to the State upon expiration or sooner termination of this Grant, containing an Evaluation and Review of Grantee's performance and the final status of Grantee's obligations hereunder. In addition, Grantee shall comply with all reporting requirements, if any, set forth in Exhibit B of the ESG Grant.

2. Noncompliance

Grantee's failure to provide reports and notify the State in a timely manner may result in the delay of payment of funds and/or termination as provided under the ESG Grant.

3. Subgrants

Copies of any and all subgrants entered into by Grantee to perform its obligations hereunder shall be submitted to the State or its principal representative upon request by the State. Any and all subgrants entered into by Grantee related to its performance hereunder shall comply with all applicable federal and state laws and shall provide that such subgrants be governed by the laws of the State of Colorado.

4. MOU

Memorandum of Understanding between the Grantee and any and all subrecipients must be reviewed and approved by DOH.

12. Grantee Records.

1. Maintenance

Grantee shall make, keep, maintain, and allow inspection and monitoring by the State of a complete file of all records, documents, communications, notes and other written materials, electronic media files, and communications, pertaining in any manner to the Work or the delivery of Services (including, but not limited to the operation of programs) or Goods hereunder. Grantee shall maintain such records (the "Record Retention Period") until the last to occur of the following: **(i)** a period of five years after the date this Grant is completed or terminated, or final payment is made hereunder, whichever is later, or **(ii)** for such further period as may be necessary to resolve any pending matters, or **(iii)** if an audit is occurring, or Grantee has received notice that an audit is pending, then until such audit has been completed and its findings have been resolved.

2. Recordkeeping requirements: ESG provides minimum acceptable evidence required to document each category of the homeless definition at 24 CFR 576.2.

For determining and documenting homelessness, use this order of priority:

- 1) third-party documentation,
- 2) intake worker observations, and
- 3) certification from the person seeking assistance.

Minimum acceptable types of documentation vary depending on the particular circumstance. Third party documentation should be obtained whenever possible, but lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.

2. Inspection

Grantee shall permit the State, the federal government and any other duly authorized agent of a governmental agency to audit, inspect, examine, excerpt, copy and/or transcribe Grantee's records related to this Grant during the Record Retention Period for a period of five years following termination of this Grant or final payment hereunder, whichever is later, to assure compliance with the terms hereof or to evaluate Grantee's performance hereunder. The State reserves the right to inspect the Work at all reasonable times and places during the term of this Grant, including any extension. If the Work fails to conform to the requirements of this Grant, the State may require Grantee promptly to bring the Work into conformity with Grant requirements, at Grantee's sole expense. If the Work cannot be brought into conformance by re-performance or other corrective measures, the State may require Grantee to take necessary action to ensure that future performance conforms to Grant requirements and exercise the remedies available under this Grant, at law or inequity in lieu of or in conjunction with such corrective measures.

3. Monitoring

Grantee shall permit the State, federal government, and other governmental agencies having jurisdiction, in their sole discretion, to monitor all activities conducted by Grantee pursuant to the terms of this Grant using any reasonable procedure, including, but not limited to: internal evaluation procedures, examination of program data, special analyses, on-site checking, formal audit examinations, or any other procedures. All monitoring controlled by the State shall be performed in a manner that shall not unduly interfere with Grantee's performance hereunder. In conjunction with the CoC, DOH will conduct on-site monitoring reviews to ensure all requirements are met.

4. Final Audit Report

Grantee shall provide a copy of its audit report(s) to DOLA as specified in Exhibit B of the ESG Grant

13. Confidential Information-State Records -Grantee shall comply with the provisions on §10 of the ESG

Grant if it becomes privy to confidential information in connection with its performance. Confidential information, includes, but is not necessarily limited to, state records, personnel records, and information concerning individuals.

1. Confidentiality

Grantee shall keep all State records and information confidential at all times and to comply with all laws and regulations concerning confidentiality of information. Any request or demand by a third party for State records and information in the possession of Grantee shall be immediately forwarded to the State's principal representative.

2. Notification

Grantee shall notify its agent, employees, Subgrantees, and assigns who may come into contact with State records and confidential information that each is subject to the confidentiality requirements set forth herein, and shall provide each with a written explanation of such requirements before they are permitted to access such records and information.

3. Use, Security, and Retention

Confidential information of any kind shall not be distributed or sold to any third party or used by Grantee or its agents in any way, except as authorized in writing by the State. Grantee shall provide and maintain a secure environment that ensures confidentiality of all State records and other confidential information wherever located. Confidential information shall not be retained in any files or otherwise by Grantee or its agents, except as approved in writing by the State.

4. Disclosure-Liability

Disclosure of State records or other confidential information by Grantee for any reason may be cause for legal action by third parties against Grantee, the State or their respective agents. Grantee shall, to the extent permitted by law, indemnify, save, and hold harmless the State, its employees and agents, against any and all claims, damages, liability and court awards including costs, expenses, and attorney fees and related costs, incurred as a result of any act or omission by Grantee, or its employees, agents, Subgrantees, or assignees.

5. Recordkeeping and reporting

The recipient must have policies and procedures to ensure the requirements of this part are met, including those required by 2 CFR part 200. The policies and procedures must be established in writing and implemented by the Grantee and its subrecipients to ensure that ESG funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable the recipient and HUD to determine whether ESG requirements are being met.

14. Conflicts of Interest – 576.404

(a) Organizational conflicts of interest. The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the recipient, the subrecipient, or a parent or subsidiary of the subrecipient. No subrecipient may, with respect to individuals or families occupying housing owned by the subrecipient, or any parent or subsidiary of the subrecipient, carry out the initial evaluation required under § 576.401 or administer homelessness prevention assistance under § 576.103. Recipients and sub recipients must also maintain written standards of conduct covering organizational conflicts of interest required under 2 CFR 200.318.

(b) Individual conflicts of interest. For the procurement of goods and services, the recipient and its subrecipients must comply with 2 CFR 200.317 and 200.318. For all other transactions and activities, the following restrictions apply:

(1) Conflicts prohibited. No person described in paragraph (b)(2) of this section who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure.

(2) Persons covered. The conflict-of-interest provisions of paragraph (b)(1) of this section apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients.

15. Breach

1. Defined

In addition to any breaches specified in any section of the ESG contract, the failure of either Party to perform any of its material obligations hereunder in whole or in part or in a timely or satisfactory manner, constitutes a breach. The institution of proceedings under any bankruptcy, insolvency, reorganization or similar law, by or against Grantee, or the appointment of a receiver or similar officer for Grantee or any of its property, which is not vacated or fully stayed within 20 days after the institution or occurrence thereof, shall also constitute a breach.

2. Notice and Cure Period

In the event of a breach, notice of such shall be given in writing by the aggrieved Party to the other Party in the manner provided in §16 of the ESG Grant. If such breach is not cured within 30 days of receipt of written notice, or if a cure cannot be completed within 30 days, or if cure of the breach has not begun within 30 days and pursued with due diligence, the State may exercise any of the remedies set forth in §15 of the ESG contract. Notwithstanding anything to the contrary herein, the State, in its sole discretion, need not provide advance notice or a cure period and may immediately terminate this Grant in whole or in part if reasonably necessary to preserve public safety or to prevent immediate public crisis.

16. Remedies

If Grantee is in breach under any provision of the ESG Grant, the State shall have all of the remedies listed in §15 of the ESG Grant in addition to all other remedies set forth in other sections of the ESG Grant following the notice and cure period set forth in §14(B). The State may exercise any or all of the remedies available to it, in its sole discretion, concurrently or consecutively.

1. Termination for Cause and/or Breach

If Grantee fails to perform any of its obligations hereunder with such diligence as is required to ensure its completion in accordance with the provisions of the ESG Grant and in a timely manner, the State may notify Grantee of such non-performance in accordance with the provisions herein. If Grantee thereafter fails to promptly cure such non-performance within the cure period, the State, at its option, may terminate this entire Grant or such part of this Grant as to which there has been delay or a failure to properly perform. Exercise by the State of this right shall not be deemed a breach of its obligations hereunder. Grantee shall continue performance of this Grant to the extent not terminated, if any.

2. Obligations and Rights

To the extent specified in any termination notice, Grantee shall not incur further obligations or render further performance hereunder past the effective date of such notice, and shall terminate outstanding orders and subgrants/subcontracts with third parties. However, Grantee shall complete and deliver to the State all Work, Services and Goods not cancelled by the termination notice and may incur obligations as are necessary to do so within this Grant's terms. At the sole discretion of the State, Grantee shall assign to the State all of Grantee's right, title, and interest under such terminated orders or subgrants/subcontracts. Upon termination, Grantee shall take timely, reasonable and necessary action to protect and preserve property in the possession of Grantee in which the State has an interest. All materials owned by the State in the possession of Grantee shall be immediately returned to the State. All Work Product, at the option of the State, shall be delivered by Grantee to the State and shall become the State's property.

3. Payments

The State shall reimburse Grantee only for accepted performance up to the date of termination. If, after termination by the State, it is determined that Grantee was not in breach or that Grantee's action or inaction was excusable, such termination shall be treated as a termination in the public interest and the rights and obligations of the Parties shall be the same as if this Grant had been terminated in the public interest, as described herein.

4. Damages and Withholding

Notwithstanding any other remedial action by the State, Grantee also shall remain liable to the State for any damages sustained by the State by virtue of any breach under this Grant by Grantee and the State may withhold any payment to Grantee for the purpose of mitigating the State's damages, until such time as the exact amount of damages due to the State from Grantee is determined. The State may withhold any amount that may be due to Grantee as the State deems necessary to protect the State, including loss as a result of outstanding liens or claims of former lien holders, or to reimburse the State for the excess costs incurred in procuring similar goods or services. Grantee shall be liable for excess costs incurred by the State in procuring from third parties replacement Work, Services or substitute Goods as cover.

17. Notices and Representatives

Each individual identified within the ESG Grant shall be the principal representative of the designating Party. All notices required to be given hereunder shall be hand delivered with receipt required or sent by certified or registered mail to such Party's principal representative at the address set forth below. In addition to, but not in lieu of a hard-copy notice, notice also may be sent by e-mail to the e-mail addresses, if any, set forth below. Either Party may from time to time designate by written notice substitute addresses or persons to whom such notices shall be sent. Unless otherwise provided herein, all notices shall be effective upon receipt.

18. ESG ELIGIBLE ACTIVITIES. Grantee shall ensure that all project activities are in accordance with 24 CFR Parts 84, 85, 91 and 576, and all related regulations and requirements. Only costs incurred for ESG funded activities, are reimburseable. Activities and related services/costs allowed under ESG program are detailed below.

Eligible Activities.

Shelter Operations. (24 CFR 576.102) This activity includes the payment of shelter maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, and furnishings, supplies necessary for the operation of the emergency shelter, for reasonable and appropriate motel and hotel vouchers if no appropriate shelter beds are available.

Staff Operations. (24 CFR 576.102) This activity may include salary, wages, fringe benefits, and insurance costs for agency staff necessary for the operation of the program.

Essential Services. (24 CFR 576.102) This activity includes services provided to individuals and families who are in emergency shelter that include case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills, mental health services, substance abuse treatment services, transportation, services for special populations.

Homeless Prevention and Rapid Re-Housing – (24 CFR 576.103/576-104) Financial assistance is limited to the following activities: short-term rental assistance, medium-term rental assistance, rental application fees, last month's rent, security deposits, utility deposits, utility payments, moving cost assistance. Grantee and Subgrantees must not make payments directly to program participants, only to third parties, such as landlords or utility companies. In addition, an assisted property may not be owned by the Grantee, Subgrantee or the parent, subsidiary or affiliated organization of the Subgrantee.

Rental Assistance. (24 CFR 576-106) Short and medium-term rental assistance consists of tenant-based or project-based rentals that can be used to allow individuals and families to remain in their existing rental units or help them obtain and remain in rental units they select. Short-term rental assistance may not exceed rental costs accrued over a period of 3 months. Medium-term rental assistance may not exceed actual rental costs accrued over a period of 4-18 months. No program participant may receive more than 18 months of assistance under ESG. Please note that this is a DOH policy. HUD does allow up to 24 months of assistance.

For use with other subsidies. Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant based rental assistance, or living in a housing unit receiving project based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

Security and Utility Deposits. ESG funds may be used to pay for security deposits, including utility deposits, for eligible program participants. In contrast to the requirements regarding rental assistance payments, security and utility deposits covering the same period of time in which assistance is being provided through another housing subsidy program are eligible, as long as the assistance from the other housing subsidy program does not include security and utility deposits.

Utility Payments. ESG funds may be used for up to 18 months of utility payments, including up to 6 months of utility payments in arrears, for each program participant, provided that the program participant or a member of his/her household has an account in his/her name with the utility company or proof of responsibility to make utility payments, such as cancelled checks or receipts in his/her name from the utility company.

Moving Cost Assistance. ESG funds may be used for reasonable moving costs, such as truck rental, hiring a moving company, or short-term storage fees for a maximum of 3 months or until the program participant is in housing, whichever is shorter.

Housing Relocation and Stabilization Services. (24 CFR 576.105) ESG funds may be used for services that assist program participants with housing stability and placement. Eligible services are:

Housing Stability Case management. This shall include the assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability. Component services and activities may include: (a) counseling, developing, securing, and coordinating services including Federal, state and local benefits; (b) monitoring and evaluating program participant progress; (c) assuring that program participants' rights are protected; and (d) developing an individualized housing and service plan, including a path to permanent housing stability subsequent to ESG financial assistance.

ESG Policies - Page 8 of 13 Pages

(e) using the centralized or coordinated assessment system to conduct the initial evaluation and re-evaluation, (f) provide information and referrals to other providers.

Street Outreach. This includes costs related to essential services for sheltered persons including engagement, case management, emergency health services, emergency health or mental health care, transportation, and services to special populations.

Housing Search and Placement. This includes services or activities designed to assist individuals or families in locating, obtaining, and retaining suitable housing. Component services or activities may include: tenant counseling; assisting individuals and families with submitting rental applications and understanding leases; assist with obtaining utilities and making moving arrangements; housing search and outreach to and negotiating with property owners, assessment of housing for compliance with ESG requirements.

Mediation. Between the program participant and owner, only eligible if necessary to prevent loss of permanent housing.

Legal Services. Legal services must be necessary to resolve a legal problem that prohibits the program participant from obtaining or maintaining permanent housing or will likely result in the loss of permanent housing. May include landlord/tenant matters; child support; guardianship, paternity, emancipation, and legal separation; orders of protection and other civil remedies for victims of DV; appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.

Credit repair. This service is to assist program participants with credit counseling and other services necessary to assist with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit.

Homeless Management Information Systems (HMIS) (24 CFR 576.107) Data collection.

Coordinated Intake. Grantee and Subgrantee must participate in the coordinated intake assessment process and collect consistent baseline data to better ensure HMIS data collected is consistent across State and Continuum of Care. Further, Grantee and Subgrantee shall ask all program participants whether participant specific HMIS information can be utilized for programmatic and regional evaluation. Grantee and subgrantees must enter data on all persons served and all activities assisted under ESG or comparable database (see below).

Victim service providers must not enter data into an HMIS but must use a comparable database. Legal services providers may use a comparable database. Information in comparable data must not be entered directly into or provided to an HMIS.

Grantee agrees to fully comply with the Rules and Regulations required by HUD which govern the HMIS. HUD's funding for continuation of all Continuum of Care Supportive Housing programs is contingent on the participation of funded agencies and the data quality collected by the HMIS system. Current and future funding by the DOH will also be dependent on HMIS participation and performance.

For Domestic Violence Shelters' a comparable client-level database. Therefore, reasonable and appropriate costs associated with operating an HMIS for purposes of collecting and reporting data required under ESG and analyzing patterns of use of ESG funds are eligible.

DOH Requirements. Other information may be requested by CDOH for reporting and program evaluation such as the number of participants, the status of each participant, the location of units, the mental status/progress of the participants, and any other relevant information. The local CoC HMIS must generate these reports.

Evaluation. Grantee and Subgrantee(s) must comply if asked to participate in HUD-sponsored research and evaluation of ESG. Eligible costs include costs for Grantee participation in HUD research and evaluation of the program.

Eligible costs. Eligible costs include (a) the purchase or leasing computer hardware, purchase software or software licenses, (b) purchase or leasing equipment, including telephones, faxes and furniture, (c) staffing associated with operating HMIS including data collection, completing data entry, monitoring and reviewing data quality, completing data analysis, reporting to the HMIS lead, training staff on using the HMIS or comparable database, implementing and complying with HMIS requirements.

Ineligible costs. HMIS activities that are ineligible include development of new software

Administration. (24 CFR 576.108)

Cost of overall program management, coordination, monitoring and evaluation. Administrative costs may be used for: (a) travel costs incurred for monitoring of subrecipients, (b) administrative services performed under third party contracts or agreements, including general legal services, accounting services and audit services, (c) Other costs for goods and services required for administration of the program, including rental or purchase equipment, insurance utilities, office supplies, and rental and maintenance (but not purchase) of office space, (d) staff salaries, wages and related costs of staff engaged in eligible program administration activities, (e) costs of providing training on ESG requirements and attending HUD sponsored ESG trainings, (f) costs of preparing and amending the ESG and homelessness related sections of the consolidated plan in accordance with ESG requirements and 24 CFR part 91 and (g) Costs of carrying out the environmental review responsibilities under 576.407. Administrative costs do not include the costs of issuing financial assistance, providing housing relocation and stabilization services, or carrying out eligible data collection and evaluation activities, as specified above, such as Grantee or Subgrantee staff salaries, costs of conducting housing inspections, and other operating costs. These costs should be included under one of the other eligible activity.

19. Ineligible and Prohibited Activities.

- 1. Coordination with Other Resources.** The intent of ESG is to provide funding for housing expenses to persons who are homeless or who would be homeless if not for this assistance. Therefore, financial assistance or services to pay for expenses that are available through other programs, are not eligible. Case managers should work to link program participants to these other resources.
- 2. Mortgage Costs.** Financial assistance **may not** be used to pay for any mortgage costs or costs needed by homeowners to assist with any fees, taxes, or other costs of refinancing a mortgage to make it affordable. This includes the development and implementation of any mortgage assistance activity costs including, but not limited to, short-term subsidies to defray mortgage arrearages
- 3. Other Activities.** ESG funds **may not** be used to pay for any of the following items: credit card bills or other consumer debt; clothing and grooming; home furnishings; pet care; entertainment activities; work or education related materials; and cash assistance to program participants. ESG funds may not be used to develop discharge planning programs in mainstream institutions such as hospitals, jails, or prisons. Finally, while training for case managers and program administrators is an eligible administrative cost as long as it is directly related to ESG program operations, ESG funds may not be used to pay for certifications, licenses, and general training classes. Programs may not charge fees to ESG program participants. Any ESG funds used to support program participants must be issued directly to the appropriate third party, such as the landlord or utility company, and in no case are funds eligible to be issued directly to program participants. If funds are found to be used for ineligible activities as determined by the State or HUD, the Grantee will be required to reimburse **the ineligible costs**.
- 4. Acquisition Costs.** Acquisition of an emergency shelter for the homeless.

**ESG GRANTEE MINIMUM REQUIRED WRITTEN
STANDARDS-POLICIES AND PROCEDURES**

At a minimum these written standards must include:

Policies and procedures for evaluating eligibility.

Grantee or subgrantees must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under § 576.400(d) and the written standards established under § 576.400(e).

Policies and procedures for coordination among emergency shelter providers.

All shelter, homeless prevention, and rapid rehousing assistance providers; other homeless assistance providers; and mainstream service and housing providers [see § 576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and Integrated to the maximum extent practicable—see following page for details .policy can state that provisions in 576.400(b) and (c) will be met.]

Participation in HMIS

Grantee must ensure that data on all persons served and all activities assisted under ESG are entered into the HMIS system. If the grantee is a victim service provider, it may use HMIS policies and requirements or a comparable database to track the client information)

Housing Inspections Policy

All units must meet minimum habitability standards including lead based paint inspections for all units built prior to 1978 with a child 6 years old or younger or with a pregnant female in residence and carbon monoxide inspection including procedures for Lead-Based Pain (LBP) Compliance per 24 CFR 35for properties providing Tenant Based Rental Assistance.

Participation of homeless individuals

Grantee that is not a State agency must provide for the participation of not less than 1 homeless individual or former homeless individual on the board of directors or other equivalent policymaking entity to the extent that such entity considers and makes decisions regarding the facility, services or other assistance of the Grantee assisted with ESGfunds.

Record Retention Policy

Grantee shall have a record retention pertinent to expenditures incurred under this contract for a period of five (5) years after the termination of all activities funded. Notwithstanding the above, if there are litigations, claims, audits, negotiations or other actions that involve any of the records, the records must be retained until completion of the actions and resolution of all issues, or the expiration of the five-year period, whichever occurs later.

Matching Funds

Grantee must have a policy regarding matching and/or leveraged funds per 24 CFR 576.500 (o), recordkeeping of the source and use of ESG matching contributions

Termination of assistance. Grantee must established a formal process that recognizes the rights of individuals affected. The grantee must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

Prevention and Rapid Re-housing terminations

The required formal process, at a minimum, must consist of:

- Written notice to the program participant containing a clear statement of the reasons for termination
- A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision
- Prompt written notice of the final decision to the program participant.

Additional standards for Street Outreach:

- Standards for targeting and providing essential services related to street outreach.

Additional standards for Emergency Shelters:

- Policies and procedures for admission, diversion, referral, and discharge by emergency shelters, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, [e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest]
- Policies and procedures for assessing, prioritizing, and reassessing needs for essential services related to emergency shelter.

Additional standards for Homeless Prevention and Rapid Re-Housing:

Policies and procedures for determining and prioritizing homelessness prevention and rapid re-housing assistance.

- RRH is only available to individuals and families who meet the definition for literally homeless (Category 1 and 4 under the Homeless Definition Final Rule).
- HP assistance can be available to individuals and families that are in homeless Categories 2, 3, and 4, but not literally homeless. HP assistance can also be available to individuals and families in at-risk of homelessness Categories 1, 2, and 3.
- Standards for determining what percentage or amount of rent and utilities costs, if any, each program participant must pay while receiving homelessness prevention or rapid re-housing assistance.
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time, if at all.
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months in the program; or the maximum number of times the program participant may receive assistance.
- Standards for use with other subsidies. Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant based rental assistance, or living in a housing unit receiving project based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.
- Standards for addressing the needs of ineligible applicants.

Other Federal Requirements

Policies and procedures for procurement transactions per 24 CFR 576.407(c), Uniform requirements. The requirements of 2 CFR part 200 Uniform Administrative Requirements, Costs Principles, and Audit Requirements for Federal Awards apply grantee.

§ 576.400- Area-wide systems coordination requirements.

(b) **Coordination with other targeted homeless services.** The recipient and its sub-recipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by the Continuum of Care or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area. These programs include:

- (1) Shelter Plus Care Program (24 CFR part 582);
- (2) Supportive Housing Program (24 CFR part 583);
- (3) Section 8 Moderate Rehabilitation Program for Single Room Occupancy Program for Homeless Individuals (24 CFR part 882);
- (4) HUD—Veterans Affairs Supportive Housing (HUD-VASH) (division K, title II, Consolidated Appropriations Act, 2008, Pub. L. 110-161 (2007), 73 FR 25026 (May 6, 2008));
- (5) Education for Homeless Children and Youth Grants for State and Local Activities (title VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.));
- (6) Grants for the Benefit of Homeless Individuals (section 506 of the Public Health Services Act (42 U.S.C. 290aa-5));
- (7) Healthcare for the Homeless (42 CFR part 51c);
- (8) Programs for Runaway and Homeless Youth (Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.));
- (9) Projects for Assistance in Transition from Homelessness (part C of title V of the Public Health Service Act (42 U.S.C. 290cc-21 et seq.));
- (10) Services in Supportive Housing Grants (section 520A of the Public Health Service Act);
- (11) Emergency Food and Shelter Program (title III of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11331 et seq.));
- (12) Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (section 40299 of the Violent Crime Control and Law Enforcement Act (42 U.S.C. 13975));
- (13) Homeless Veterans Reintegration Program (section 5(a)(1)) of the Homeless Veterans Comprehensive Assistance Act (38 U.S.C. 2021);
- (14) Domiciliary Care for Homeless Veterans Program (38 U.S.C. 2043);
- (15) VA Homeless Providers Grant and Per Diem Program (38 CFR part 61);
- (16) Health Care for Homeless Veterans Program (38 U.S.C. 2031);
- (17) Homeless Veterans Dental Program (38 U.S.C. 2062);
- (18) Supportive Services for Veteran Families Program (38 CFR part 62); and
- (19) Veteran Justice Outreach Initiative (38 U.S.C. 2031).

(c) **System and program coordination with mainstream resources.** The recipient and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Examples of these programs include:

- (1) Public housing programs assisted under section 9 of the U.S. Housing Act of 1937 (42 U.S.C. 1437g) (24 CFR parts 905, 968, and 990);
- (2) Housing programs receiving tenant-based or project-based assistance under section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f) (respectively 24 CFR parts 982 and 983);
- (3) Supportive Housing for Persons with Disabilities (Section 811) (24 CFR part 891);
- (4) HOME Investment Partnerships Program (24 CFR part 92);
- (5) Temporary Assistance for Needy Families (TANF) (45 CFR parts 260-265);
- (6) Health Center Program (42 CFR part 51c);
- (7) State Children's Health Insurance Program (42 CFR part 457);
- (8) Head Start (45 CFR chapter XIII, subchapter B);
- (9) Mental Health and Substance Abuse Block Grants (45 CFR part 96); and
- (10) Services funded under the Workforce Investment Act (29 U.S.C. 2801 et seq.).

Discussion:

Attachments

Citizen Participation Comments



Everson - DOLA, Connor <connor.everson@state.co.us>

Division of Housing Updates - July 11, 2022

Alison George - Department of Local Affairs <alison.george@state.co.us>
Reply-To: Alison George - Department of Local Affairs <alison.george@state.co.us>
To: connor.everson@state.co.us

Mon, Jul 11, 2022 at 10:17 AM

[View this email in your browser](#)



DOH Updates

JULY 2022

Local Official's Toolkit Re-Envisioned



GUIDE FOR LOCAL OFFICIALS

The Colorado Division of Housing (DOH) is pleased to announce Enterprise Community Partners, Inc. was selected to develop and roll out the re-envisioned Local Officials Toolkit, which was funded and created through **HB21-1271**. The need for increased education, training, and technical assistance was a common theme heard throughout the stakeholder process conducted by DOH and its partners (Housing Colorado and the Colorado Housing and Finance Authority) in 2019, and again in 2021 in the Strategic

Housing Working Group **report**. Beginning with the 2022 Statewide Engagement Event Series (see below and registration info [here](#)), Enterprise and DOH will begin a stakeholder outreach process in June and July to help inform the Toolkit creation and implementation. Please stay tuned for an announcement in the next few weeks of additional stakeholder outreach dates and locations or virtual login information. Once complete, the toolkit will consist of one-hour and half-day trainings, a web-based affordable housing resource guide available on our website, and a competitive application for in-depth technical assistance tailored to fit the needs of awarded communities. Any questions about the Toolkit can be directed to Andrew Atchley at DOH (Andrew.Atchley@state.co.us).

Statewide Engagement and Survey



The first of six statewide engagement sessions in Frisco was a success with participants from Jackson County to Pitkin County. Don't miss your opportunity to participate in one of the five remaining sessions below. Please also share your thoughts through this online survey:

Statewide Engagement Survey

Upcoming engagement event dates and locations:

- Wednesday, July 13, 2022 • Denver • 9:00 am - 3:00 pm
- Tuesday, July 19, 2022 • Grand Junction • 9:00 am - 3:00 pm
- Tuesday, July 26, 2022 • Greeley • 9:00 am - 3:00 pm
- Tuesday, August 2, 2022 • Durango • 9:00 am - 3:00 pm
- Tuesday, August 9, 2022 • Colorado Springs • 10:00 am - 4:00 pm

Registration information can be found [here](#).

Draft Annual Action Plan



**You are invited to
SUBMIT PUBLIC COMMENTS &
ATTEND A VIRTUAL PUBLIC HEARING**
Regarding the State of Colorado Department of Local Affairs'
2022-23 Annual Action Plan for HUD Funds

[PARA ESPAÑOL HAGA CLIC AQUÍ](#)

The State of Colorado receives annual formula grants for five programs from the U.S. Department of Housing and Urban Development (HUD). In order to receive those funds, the State is required under the National Affordable Housing Act to prepare and submit a 5-Year Consolidated Plan with Annual Action Plans pursuant to the five year plan. We would like to remind readers that this plan is specifically for HUD's CDBG, ESG, HOME, HTF, and HOPWA programs and does not concern other programs, such as new programs created by the 2022 Legislative Session of the Colorado General Assembly.

This Annual Action Plan will cover the period from April 1, 2022, through March 31, 2023, and will be published on the **Publications and Reporting** section of DOH's website on July 11, 2022. Comments on the Annual Action Plan will be accepted through August 10, 2022, and a virtual public hearing will be held for the Annual Action Plan on July 28, 2022 - the details for which may be found below.

**Virtual public hearing on the
HUD Annual Action Plan**

Thursday, July 28 • 1:00 - 2:00 p.m.

[Google Meet Link](#)

**Submit comments for the
HUD Annual Action Plan to:**

Division of Housing
ATTN: Connor Everson

Join by phone: 234-805-1158
PIN: 974 198 644#

*More phone number options
available here.*

1313 Sherman Street, Suite 500
Denver CO, 80203

- OR -

connor.everson@state.co.us

*Comments will be accepted
through August 10, 2022.*

New State Housing Board Members



Cole Wist

Congressional District 6

Cole Wist is a fourth-generation Coloradan. He recently completed two terms in the Colorado General Assembly, serving as the Assistant Minority Leader of the Colorado House of Representatives and a Commissioner on the Uniform Law Commission.

Commissioner Wist is a 30-year defense attorney with the Denver office of Squire Patton Boggs, a global law firm with 45 offices and over 1,500 attorneys. His legal practice emphasizes representation of employers in labor and employment matters and workplace accident investigations. Commissioner Wist has counseled and defended clients following some of the country's highest profile occupational disasters. He has appeared in state and federal courts across the country.

Over the course of his legislative career, Commissioner Wist earned a reputation as a productive, bipartisan lawmaker. He sponsored and passed significant legislation, including Colorado's sweeping data privacy and breach notification statute, a bill to reform the state's construction defect litigation process, a law creating an alternative dispute mechanism for open records disputes, and a civil rape shield statute. Commissioner Wist's legislative accomplishments and policy work have been recognized by national and state organizations, including Colorado Coalition Against Sexual Assault,

Colorado Civil Justice League and Mental Health America.

Commissioner Wist is a graduate of the University of Denver and Georgetown University Law Center.

James Martinez

Congressional District 8 (Newly-formed District)

James Martinez is the President of the Golden-based Martinez Associates, Inc., which provides comprehensive geotechnical engineering, construction inspection, and testing services for highway, bridge, commercial/residential buildings, and water/wastewater projects throughout Colorado. Before starting Martinez Associates in 2011, James worked for several national geotechnical companies for the past 25 years. James is active in the Metro Denver community and serves as the Vice President of the Hispanic Contractors of Colorado. James graduated from the Latino Leadership Institute at the University of Denver. James also is a current member of the American Society for Testing and Materials and sits on several other committees that develop technical standards and guidelines for the geotechnical industry worldwide.

DOH is Hiring!



Housing Data Manager

(Posting closes TODAY 7/11/22)

This position will oversee the development and use of various data systems formulating techniques and processes to collect, analyze, organize, and store data with a focus on data integrity, legitimacy, security, and confidentiality. In addition, this position will interpret data and establish reports and guidelines for extracting data and sharing it with management and stakeholders.

Loan and Grant Specialist

(Posting closes TODAY 7/11/22)

This position will be responsible for preparing and executing loan and grant agreements for DOH. These agreements contain the terms and conditions upon which the State of Colorado will provide state or federal funds to the qualified applicants for use in the acquisition, development, rehabilitation, and preservation of affordable housing, supportive housing, emergency shelters, providing housing services, and other housing-related assistance.

Executive Assistant

(Posting closes 7/18/22)

The Executive Assistant for DOH's Director will use their skills in coordination and organizational effectiveness to assist the Director in planning for events and trainings, manage calendars, oversee Division memberships and onboard new staff through the growth of the Division. This position is ideal for a collaborative person seeking to make a positive impact on Coloradans.

Housing Development Program Manager

(Posting closes 7/21/22)

The Housing Development Program Manager provides leadership in the administration and budgeting of all DOH grant and loan programs for housing development. As part of the DOH management team, the position oversees the team responsible for underwriting, negotiating and recommending for approval the State's investments in affordable housing programs and projects statewide. In addition the Housing Development team works with and assists local communities and developers to help them bring affordable housing opportunities to their communities.

Contracts Administrator Team Lead

(Posting closes 7/25/22)

The position is integral to upholding the DOH mission and providing funds for the development of affordable housing and for housing programs. This position will negotiate, draft, and clarify legal documents, including grants, loans, contracts, and amendments with private housing developers, local housing authorities, and non-profits. The position is a team lead, supporting other contract team staff in the drafting, negotiating, and executing of loan agreements and other related documents.

Employment Opportunities with the Department of Local Affairs



This email was sent to connor.everson@state.co.us
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Division of Housing · 1313 Sherman St Rm 500 · Denver, CO 80203 · USA



COLORADO
Department of Local Affairs
Division of Housing

Te invitamos a
ASISTIR A UNA REUNIÓN PÚBLICA
ENVIAR COMENTARIOS PÚBLICOS
Con respecto al Departamento de Locales de Colorado
Plan de Acción 2022-2023

El estado de Colorado recibe subvenciones anuales del Departamento de Viviendas y Desarrollo Urbano de los Estados Unidos (HUD). Para recibir esos fondos, el Estado está obligado por la Ley Nacional de Vivienda Asequible para preparar y presentar un Plan Consolidado de 5 años con Planes de Acción Anuales de conformidad con el plan de cinco años. El Plan consolidado actual cubre el período del 1 de abril de 2020 al 31 de marzo de 2024.

El Plan de acción incluye información sobre las metas y objetivos generales para el próximo año con una descripción de los recursos disponibles y las acciones propuestas para abordar las necesidades identificadas. El Departamento de Asuntos Locales del Estado (DOLA, por sus siglas en inglés) es la agencia líder en la administración de estos fondos y los utilizará para promover su misión de fortalecer a las comunidades de Colorado de manera consistente con la intención de los programas y que cumplan con las leyes y regulaciones que rigen ellos.

Los miembros del público pueden compartir sus opiniones sobre en ambos documentos contactando a Connor Everson a través de la información a continuación, o asistiendo a una reunión pública virtual el 28 de agosto de 2022 de 13:00 a 14:00. También se puede solicitar una versión del informe en español. Se puede solicitar un traductor comunicándose con la División en la información a continuación.

El Plan de Acción 2022-2023 estará disponible para su revisión en el Departamento de Asuntos Locales de Colorado sitio web en la pestaña Publicaciones e informes, a partir del 11 de julio de 2022. Los comentarios por escrito o por correo electrónico deben recibirse antes del 10 de agosto de 2022 por el Plan de Acción en;



Governor Jared S. Polis | Rick M. Carls, Executive Director | Alison George, Division Director
1513 Sherman St., Room 320, Denver, CO 80202 P 303.864.7810 F 303.864.7857 TDD/TTY 303.864.7758 www.dola.colorado.gov
Strengthening Colorado Communities





División de Vivienda de Colorado
1313 Sherman Street, Habitación 500
Denver CO, 80203
ATTN: Connor Everson

o

connor.everson@state.co.us
Ph: 303.864.7844

Plan de Acción Reunión Pública Virtual
Jueves 28 de Julio 13:00 – 14:00
<https://meet.google.com/avb-tgjf-goa>

o llamar:
+1 234 805 1158

PIN: 974 198 644#



Governor Jared S. Polis | Rick M. Carls, Executive Director | Alison George, Division Director
1313 Sherman St., Room 320, Denver, CO 80203 P 303.864.7810 F 303.864.7857 TDD/TTY 303.864.7758 www.dola.colorado.gov
Strengthening Colorado Communities





OHFS Website Posting for HUD on Monday?

Everson - DOLA, Connor <connor.everson@state.co.us>

Thu, Jul 7, 2022 at 6:24 PM

To: Adam Brisnehan - DOLA <adam.brisnehan@state.co.us>, Julia Zaffarano - DOLA <julia.zaffarano@state.co.us>, Alison OKelly - DOLA <alison.okelly@state.co.us>, Andrew Paredes - DOLA <andrew.paredes@state.co.us>

Hi Adam,

Do you know if you will have bandwidth on monday for a website posting?

It will be about the Annual Action Plan for HUD, which primarily supports HOME, HTF, and CDBG.

If you do, I'll be sure to provide the text, link, and location.

Connor Everson
Analytics Manager
He/Him/His



COLORADO
Department of Local Affairs
1313 Sherman St., Room 500 Denver, CO 80203
303.864.7856

P 303.864.7844
F 303.864.7856
1313 Sherman St., Room 500 Denver, CO 80203
connor.everson@state.co.us | www.colorado.gov/dola

Under the Colorado Open Records Act (CORA), all messages sent by or to me on this state-owned e-mail account may be subject to public disclosure.



OHFS Website Posting for HUD on Monday?

Brisnehan - DOLA, Adam <adam.brisnehan@state.co.us>

Mon, Jul 11, 2022 at 7:52 AM

To: "Everson - DOLA, Connor" <connor.everson@state.co.us>

Cc: Julia Zaffarano - DOLA <julia.zaffarano@state.co.us>, Alison OKelly - DOLA <alison.okelly@state.co.us>, Andrew Paredes - DOLA <andrew.paredes@state.co.us>

Done!

Thanks!

[Quoted text hidden]

2022-07-28 12:47 State of Colorado Annual Action Plan Virtual Public Hearing Attendance Report

| First name | Last name | Email | Duration | Time joined | Time exited |
|------------|---------------------|--------------------------------|-------------|-------------|-------------|
| Jodi | Adkins - DOLA | jodi.adkins@state.co.us | 53 min | 1:02 PM | 1:55 PM |
| Cathy | Alderman | ec.a*****@***.com | 51 min | 1:00 PM | 1:51 PM |
| Alyson | Anderson - DOLA | alyson.anderson@state.co.us | 23 min | 1:33 PM | 1:56 PM |
| Kelli | Barker | keba*****@***.com | 22 min | 1:31 PM | 1:53 PM |
| Sarah | Barnes | cour*****@***.com | 51 min | 1:03 PM | 1:54 PM |
| Colorado | Counties | coco*****@***.com | 50 min | 1:02 PM | 1:52 PM |
| Connor | Everson - DOLA | connor.everson@state.co.us | 1 hr 9 min | 12:47 PM | 1:56 PM |
| Kelly | Forstbauer - DOLA | kelly.forstbauer@state.co.us | 45 min | 1:10 PM | 1:56 PM |
| Madison | Frederick | madi*****@***.org | 53 min | 1:02 PM | 1:55 PM |
| Marcela | Gaete Fuentes | marc*****@***.org | 47 min | 1:07 PM | 1:54 PM |
| Tyler | Groff | tyle*****@***.org | 40 min | 1:01 PM | 1:41 PM |
| Ken | Hoagland | kenn*****@***.com | 22 min | 12:52 PM | 1:14 PM |
| Suze | Kanack | suze*****@***.com | 59 min | 1:02 PM | 2:01 PM |
| randle | loeb | rand*****@***.com | 57 min | 12:55 PM | 1:51 PM |
| Antonio | Martinez | mart*****@***.com | 1 hr 10 min | 1:03 PM | 2:13 PM |
| Alison | OKelly - DOLA | alison.okelly@state.co.us | 53 min | 1:02 PM | 1:56 PM |
| Andrew | Paredes - DOLA | andrew.paredes@state.co.us | 44 min | 1:06 PM | 1:54 PM |
| Nicole | Samson | nrsa*****@***.com | 54 min | 1:00 PM | 1:54 PM |
| Kristin | Toombs - DOLA | kristin.toombs@state.co.us | 50 min | 1:06 PM | 1:56 PM |
| Ann | Watts - DOLA | ann.watts@state.co.us | 41 min | 1:14 PM | 1:56 PM |
| Cassy | Westmoreland - DOLA | cassy.westmoreland@state.co.us | 55 min | 1:00 PM | 1:55 PM |



DOLA's Home-ARP Investment

Howard Dolt <howard.dolt@comcast.net>
To: connor.everson@state.co.us

Wed, Aug 10, 2022 at 2:07 PM

I am a member of The Colorado Gerontological Society's Affordable Housing Coalition and an Older Adult who lives in Colorado.

There is a dire need for both short-term and long-term solutions to address low/extremely-low income Older Adult affordable housing and homelessness throughout the State. When an inadequate, fixed-income, meets market-rate rental and housing costs, it becomes very clear to see the affordability gap. Fixed/low-income Older Adults receive on average \$1,500/mo in Social Security. Our extremely-low income Older Adult population may only receive a total of \$879/mo from Old Age Pension. The average monthly cost of a one-bedroom apartment in Colorado is \$1,364. This creates a \$485 affordability gap each month for those on OAP alone. For those living on Social Security alone, each month, they are forced to make tough financial decisions, having only \$136 for necessities like: healthcare, food, transportation, broadband, clothing, hygiene products, etc.. This is extremely alarming and must be addressed. Utilizing both the HOME-ARP investments and the Community Development Block Grant investments, we recommend DOLA strongly considers the follow solutions to address and invest in low/extremely-low income Older Adult affordable housing and homelessness:

1. Short-term recommendations to address Older Adult homelessness:

A. Older Adults are not a homogenous population. In fact, they are a unique population with vast and varying needs. Majority of the existing homelessness shelters throughout the State are not conducive to the many physical, mental, social, and medical needs of Older Adults. We recommend that DOLA invests resources for the acquisition, construction, or rehabilitation of transitional shelters that are specifically designed to address and facilitate the unique needs of older adults who are currently experiencing homelessness. An example of a successful Older Adult transitional shelter that was created to assist homeless Older Adults is Denver's Sinton's Sanctuary, created and funded by the VOA. We strongly believe this model can serve as an ideal paradigm for the creation of future, innovative older adult transitional homelessness shelters.

2. Short-term recommendations to address Older Adult affordable housing:

A. Invest resources for some type of direct financial assistance/subsidy to make up for the difference in fixed-income and market-rate rental/housing costs. This may be formally seen as Colorado's emergency rental assistance program (ERAP). While this solution is short-term, it provides an imperative financial resource to avoid housing displacement and the prevention of homelessness.

3. Long-term recommendations to address Older Adult affordable housing:

A. Invest in the acquisition, construction, or rehabilitation for more affordable housing options for low/extremely low-income Older Adults. Specifically, subsidized/housing choice voucher program housing at both the State and Federal level. Majority of our low/extremely low-income Older Adults simply do not meet the income requirements to apply for low-income housing tax credit housing (LIHTC) as their income is too low. Moreover, Colorado sees the continuation of subsidized/housing choice voucher program housing options expiring each year. The result: Colorado has lost thousands of units that once were suitable and, in most cases, the only option for our lowest income Older Adult population.

Howard.dolt@comcast.net

720-938-2243



Public feedback for DOLA's 2022 annual action plan

Madisen Frederick <madisen.frederick@senioranswers.org>
To: connor.everson@state.co.us

Wed, Aug 10, 2022 at 1:54 PM

Hi Connor,


Please accept my feedback/recommendation letter on behalf of myself, and CGS.

Please let me know if you have any questions or would like to discuss further.

Thanks for all the hard work you do--

--

Madisen Frederick
Project Manager
Colorado Gerontological Society
303-333-3482

 Recommendations_comments for DOLA's HOME-ARP investment .pdf
63K



Denver Affordable Housing

Lois Darnell <lennrad5101@hotmail.com>

Wed, Aug 10, 2022 at 4:22 PM

To: "connor.everson@state.co.us" <connor.everson@state.co.us>

I am a member of The Colorado Gerontological Society's Affordable Housing Coalition and an Older Adult who lives in Colorado. At the age of 78, I am an Older Adult.

There is a dire need for both short-term and long-term solutions to address **low** and **extremely-low** income Older Adult affordable housing and homelessness throughout the State. When an inadequate, fixed-income, meets market-rate rental and housing costs, it becomes clear to see the huge affordability gap.

Fixed/low-income Older Adults receive on average \$1,500/month in Social Security. Extremely-low income Older Adults may only receive a total of \$879/month from Old Age Pension.

The average monthly cost of a one-bedroom apartment in Colorado is \$1,364. This creates a \$485 affordability gap each month for those on OAP alone. For those living on Social Security alone, each month, they are forced to make tough financial decisions, having perhaps only \$136 for necessities like: healthcare, food, transportation, broadband, clothing, hygiene products, etc., not to mention home and auto insurance, maintenance and upkeep, if they are so fortunate as to own their own home and/or auto. This difficult reality is alarming and must be addressed.

Utilizing both the HOME-ARP investments and the Community Development Block Grant investments, *we recommend DOLA strongly considers the follow solutions to address and invest in low/extremely-low income Older Adult affordable housing and homelessness:*

1. Short-term recommendations to address Older Adult homelessness:

A. Older Adults are not a homogenous population. In fact, they are a unique population with vast and varying needs. The majority of the existing homeless shelters throughout the State are not conducive to

the many physical, mental, social, and medical needs of Older Adults. We recommend that DOLA invest resources for the acquisition, construction, or rehabilitation of transitional shelters that are specifically designed to address and facilitate the unique needs of older adults who are currently experiencing homelessness.

An example of a successful Older Adult transitional shelter that was created to assist homeless Older Adults is Denver's Sinton's Sanctuary, created and funded by the VOA. We believe this model can serve as an ideal paradigm for the creation of future, innovative older adult transitional homelessness shelters.

2. Short-term recommendations to address Older Adult affordable housing:

A. Invest resources for some type of direct financial assistance/subsidy to make up for the difference in fixed-income and market-rate rental/housing costs. This may be formally seen as Colorado's emergency rental assistance program (ERAP). While this solution is short-term, it provides an imperative financial resource to avoid housing displacement and the prevention of homelessness.

3. Long-term recommendations to address Older Adult affordable housing:

A. Invest in the acquisition, construction, or rehabilitation for more affordable housing options for low/extremely low-income Older Adults. *Specifically, subsidized/housing choice voucher program housing at both the State and Federal level.*

The majority of our low/extremely low-income Older Adults simply do not meet the income requirements to apply for low-income housing tax credit housing (LIHTC) as their income is too low. Moreover, Colorado sees the continuation of subsidized/housing choice voucher program housing options expiring each year. The result: Colorado has lost thousands of units that once were suitable and, in most cases, *the only option* for our lowest income Older Adult population.

~ Lois Darnell

U. S. Department of Housing and Urban Development



Community Planning and Development

Region VIII, Denver
1670 Broadway Street
Denver, Colorado 80202-4801

Phone: 303-672-5414
Fax: 303-672-5028
Web: www.hud.gov

September 6, 2022

Rick Garcia, Executive Director
Colorado Department of Local Affairs
1313 Sherman Street, Room 500
Denver, Colorado 80203

Dear Mr. Garcia:

**SUBJECT: State Community Development Block Grant Program
Waiver Request Approval**

This letter responds to the State of Colorado's June 30, 2022, letter requesting to waive section 106(d)(2) of the Housing and Community Development Act of 1974 as amended (HCDA) (42 U.S.C. § 5306(d)(2)). Section 106(d)(2) is a statutory requirement that the State only grant Community Development Block Grant (CDBG) funds to units of general local governments (UGLGs); however, the U.S. Department of Housing and Urban Development (HUD) Secretary may suspend statutory requirements in certain circumstances. The State requested this waiver to directly carry out activities with CDBG funds in response to the Presidentially declared major disaster, Colorado Marshall Fire, FM-5423-CO, (the "Disaster") that occurred on December 31, 2021, which destroyed 1,086 homes in Boulder County, Colorado (the "County").

In accordance with Section 122 of the HCDA, the Deputy Assistant Secretary for Grant Programs has determined that good cause exists to suspend 42 U.S.C. 5306(d)(2). The State may carry out activities in Boulder County to address damage in the area that received the major disaster declaration through its employees, procurement contracts, or assistance provided under agreements with subrecipients, consistent with the entitlement CDBG regulation at 24 C.F.R. § 570.200(f). This suspension shall remain in effect through the end of Fiscal Year (FY) 2027 and only applies to funds used for housing assistance to households in the County that were impacted by the Disaster.

Furthermore, pursuant to 24 C.F.R. § 5.110, the Deputy Assistant Secretary for Grant Programs has determined that good cause exists to waive and provide alternative requirements to the following related regulations:

- 24 C.F.R. § 570.480(g) to the extent necessary to allow the State to carry out activities directly through its employees, procurement contracts, or assistance provided under agreements with subrecipients, consistent with the entitlement CDBG regulation at 24 C.F.R. § 570.200(f);

- 24 C.F.R. §§ 91.320(d) and 91.320(k)(1)(i) to the extent necessary to require the State to submit a method of distribution including a list of the use of all funds for activities it will carry out directly and how the use of funds will respond to the Disaster;
- 24 C.F.R. § 570.489(b) to the extent necessary to authorize the State to charge to the grant pre-agreement costs of its subrecipients in accordance with procedures established by the State and subject to the requirements that apply to pre-agreement costs of units of general local government in 24 C.F.R. § 570.489(b) and the requirements that apply to the use of CDBG funds, including the requirements of 24 C.F.R. Part 91;
- 24 C.F.R. § 570.483 to the extent necessary for the State to directly fulfill all requirements that § 570.483 imposes on units of general local government to demonstrate compliance with national objective criteria;
- 24 C.F.R. § 570.490(a) to the extent necessary to require the State to maintain such records for activities that it carries out directly as may be necessary to facilitate review and audit by HUD of the State's administration of CDBG funds, pursuant to 24 C.F.R. § 570.493;
- 24 C.F.R. § 570.490(b) to the extent necessary for the State to establish recordkeeping requirements for subrecipients of the State that are sufficient to facilitate reviews and audits of the State by HUD under 24 C.F.R. § 570.493;
- 24 C.F.R. § 570.493 to the extent necessary to permit HUD to make reviews and audits as may be necessary or appropriate to determine whether the State has complied with CDBG requirements;
- 24 C.F.R. § 570.489(j) to the extent necessary for all references to "unit of general local government" shall be read as "State, unit of general local government (UGLG) or State subrecipient;" and
- 24 C.F.R. § 570.492 to the extent necessary for the State to make reviews and audits, including on-site reviews of any subrecipients and local governments, as may be necessary or appropriate to meet the requirements of section 104(c)(2) of the HCD Act, as amended. In the case of noncompliance with these requirements, the state shall take such actions as may be appropriate to prevent a continuance of the deficiency, mitigate any adverse effects or consequences, and prevent a recurrence. The State shall establish remedies for noncompliance by any subrecipients or local governments.

These waivers and alternative requirements remain in effect through the end of the period of performance stated in the State's CDBG-DR grant (B-21-DF-08-0001), which is six years from the date HUD signs the CDBG-DR grant agreement, and any amendments thereto; and further, that the waivers and alternative requirements only apply to CDBG funds used for housing assistance to households in the County that were impacted by the Disaster.

The suspension and waivers provided here do not change the limits for administrative and technical assistance costs, pursuant to 24 CFR 570.489(a)(1). The State may use CDBG funds not to exceed \$100,000, plus 50 percent of administrative expenses incurred in excess of \$100,000. Amounts of CDBG funds used to pay administrative expenses in excess of \$100,000 shall not exceed the sum of three percent of the State's annual grant; three percent of program income received by UGLG during each program year, and three percent of funds reallocated by HUD to the State.

If you have questions regarding the waiver, please contact Don Morris, Senior Community Planning and Development Representative at 303-672-5418 or don.r.morris@hual.gov.

Sincerely,



Noemi Ghurghi
Regional Director

cc: Alison George, Director
Division of Housing

Grantee SF-424's and Certification(s)

OMB Number: 4040-0004
Expiration Date: 12/31/2022

| Application for Federal Assistance SF-424 | | |
|--|--|--|
| <p>* 1. Type of Submission:</p> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application | <p>* 2. Type of Application:</p> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision | <p>* If Revision, select appropriate letter(s):</p> <input type="text"/> <p>* Other (Specify):</p> <input type="text"/> |
| <p>* 3. Date Received:</p> <input type="text" value="08/12/2022"/> | <p>4. Applicant Identifier:</p> <input type="text"/> | |
| <p>5a. Federal Entity Identifier:</p> <input type="text"/> | <p>5b. Federal Award Identifier:</p> <input type="text"/> | |
| <p>State Use Only:</p> | | |
| <p>6. Date Received by State:</p> <input type="text"/> | <p>7. State Application Identifier:</p> <input type="text"/> | |
| <p>8. APPLICANT INFORMATION:</p> | | |
| <p>* a. Legal Name: <input type="text" value="State of Colorado"/></p> | | |
| <p>* b. Employer/Taxpayer Identification Number (EIN/TIN):</p> <input type="text" value="84-0644739"/> | <p>* c. UEI:</p> <input type="text" value="NUJ5 Q3DW 709#"/> | |
| <p>d. Address:</p> | | |
| <p>* Street1:</p> <input type="text" value="1313 Sherman St. Suite 500"/> | <p>Street2:</p> <input type="text"/> | |
| <p>* City:</p> <input type="text" value="Denver"/> | <p>County/Parish:</p> <input type="text"/> | |
| <p>* State:</p> <input type="text" value="CO: Colorado"/> | <p>Province:</p> <input type="text"/> | |
| <p>* Country:</p> <input type="text" value="USA: UNITED STATES"/> | <p>* Zip / Postal Code:</p> <input type="text" value="80203-2241"/> | |
| <p>e. Organizational Unit:</p> | | |
| <p>Department Name:</p> <input type="text" value="Department of Local Affairs"/> | <p>Division Name:</p> <input type="text"/> | |
| <p>f. Name and contact information of person to be contacted on matters involving this application:</p> | | |
| <p>Prefix:</p> <input type="text"/> | <p>* First Name:</p> <input type="text" value="Connor"/> | |
| <p>Middle Name:</p> <input type="text"/> | | |
| <p>* Last Name:</p> <input type="text" value="Everson"/> | | |
| <p>Suffix:</p> <input type="text"/> | | |
| <p>Title:</p> <input type="text" value="Consolidated Plan Coordinator"/> | | |
| <p>Organizational Affiliation:</p> <input type="text"/> | | |
| <p>* Telephone Number:</p> <input type="text" value="303-864-7844"/> | <p>Fax Number:</p> <input type="text" value="303-864-7856"/> | |
| <p>* Email:</p> <input type="text" value="connor.everson@state.co.us"/> | | |

| Application for Federal Assistance SF-424 | |
|--|--|
| <p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="A: State Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/> | |
| <p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/> | |
| <p>11. Catalog of Federal Domestic Assistance Number:</p> <input type="text" value="14.228"/> <p>CFDA Title:</p> <input type="text" value="Community Development Block Grant"/> | |
| <p>* 12. Funding Opportunity Number:</p> <input type="text" value="N/A"/> <p>* Title:</p> <input type="text" value="N/A"/> | |
| <p>13. Competition Identification Number:</p> <input type="text"/> <p>Title:</p> <input type="text"/> | |
| <p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text" value="CDBG Counties for 424.pdf"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| <p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="State-administered Community Development Block Grant Program."/> | |
| <p>Attach supporting documents as specified in agency instructions.</p> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> | |

| Application for Federal Assistance SF-424 | |
|---|--|
| 16. Congressional Districts Of: | |
| * a. Applicant | CO-001 |
| * b. Program/Project | CO-var |
| Attach an additional list of Program/Project Congressional Districts if needed. | |
| CDBG Counties for 424.pdf | <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> |
| 17. Proposed Project: | |
| * a. Start Date: | 04/01/2022 |
| * b. End Date: | 03/31/2023 |
| 18. Estimated Funding (\$): | |
| * a. Federal | 9,377,653.00 |
| * b. Applicant | |
| * c. State | |
| * d. Local | |
| * e. Other | |
| * f. Program Income | |
| * g. TOTAL | 9,377,653.00 |
| * 19. Is Application Subject to Review By State Under Executive Order 12372 Process? | |
| <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . | |
| <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. | |
| <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372. | |
| * 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) | |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| If "Yes", provide explanation and attach | |
| <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| 21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) | |
| <input checked="" type="checkbox"/> ** I AGREE | |
| <small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small> | |
| Authorized Representative: | |
| Prefix: | Mr. |
| * First Name: | Rick |
| Middle Name: | M. |
| * Last Name: | Garcia |
| Suffix: | |
| * Title: | Executive Director |
| * Telephone Number: | 303-864-7861 |
| Fax Number: | |
| * Email: | rick.garcia@state.co.us |
| * Signature of Authorized Representative: | <div style="border: 2px solid red; padding: 5px; display: inline-block;"> Rick M. Garcia </div> Digitally signed by Rick M. Garcia Date: 2022.08.12 10:52:00 -06'00' |
| * Date Signed: | 08/12/2022 |

Areas Covered by the CDBG program

Non-Entitlement areas in the State of Colorado, covering all or part of the following counties:

Alamosa
Archuleta
Baca
Bent
Boulder
Chaffee
Cheyenne
Clear Creek
Conejos
Costilla
Crowley
Custer
Delta
Dolores
Douglas
Eagle
Elbert
Fremont
Garfield
Gilpin
Grand
Gunnison
Hinsdale
Huerfano
Jackson
Kiowa
Kit Carson
Lake
La Plata
Larimer
Las Animas
Lincoln
Logan
Mesa
Mineral
Moffat
Montezuma
Montrose
Morgan
Otero
Ouray

Park
Phillips
Pitkin
Prowers
Pueblo
Rio Blanco
Rio Grande
Routt
Saguache
San Juan
San Miguel
Sedgwick
Summit
Teller
Washington
Weld
Yuma

Congressional Districts

CO-002,CO-003, CO-004, CO-005, CO-006

| Application for Federal Assistance SF-424 | | |
|--|--|--|
| * 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application | * 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision | * If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/> |
| * 3. Date Received: <input type="text" value="06/12/2022"/> | 4. Applicant Identifier: <input type="text"/> | |
| 5a. Federal Entity Identifier: <input type="text"/> | 5b. Federal Award Identifier: <input type="text"/> | |
| State Use Only: | | |
| 6. Date Received by State: <input type="text"/> | 7. State Application Identifier: <input type="text"/> | |
| B. APPLICANT INFORMATION: | | |
| * a. Legal Name: <input type="text" value="State of Colorado"/> | | |
| * b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="84-0644739"/> | * c. UEI: <input type="text" value="NUJ5 (3DW 7098)"/> | |
| d. Address: | | |
| * Street1: <input type="text" value="1313 Sherman St. Suite 500"/> | Street2: <input type="text"/> | |
| * City: <input type="text" value="Denver"/> | County/Parish: <input type="text"/> | |
| * State: <input type="text" value="CO: Colorado"/> | Province: <input type="text"/> | |
| * Country: <input type="text" value="USA: UNITED STATES"/> | * Zip / Postal Code: <input type="text" value="80203-2241"/> | |
| e. Organizational Unit: | | |
| Department Name: <input type="text" value="Department of Local Affairs"/> | Division Name: <input type="text"/> | |
| f. Name and contact information of person to be contacted on matters involving this application: | | |
| Prefix: <input type="text"/> | * First Name: <input type="text" value="Connor"/> | |
| Middle Name: <input type="text"/> | * Last Name: <input type="text" value="Everson"/> | |
| Suffix: <input type="text"/> | Title: <input type="text" value="Consolidated Plan Coordinator"/> | |
| Organizational Affiliation: <input type="text"/> | | |
| * Telephone Number: <input type="text" value="303-864-7844"/> | Fax Number: <input type="text" value="303-864-7856"/> | |
| * Email: <input type="text" value="connor.everson@state.co.us"/> | | |

| Application for Federal Assistance SF-424 | |
|--|--|
| <p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="A: State Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/> | |
| <p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/> | |
| <p>11. Catalog of Federal Domestic Assistance Number:</p> <input type="text" value="14.231"/> <p>CFDA Title:</p> <input type="text" value="Emergency Solutions Grant Program"/> | |
| <p>* 12. Funding Opportunity Number:</p> <input type="text" value="N/A"/> <p>* Title:</p> <input type="text" value="N/A"/> | |
| <p>13. Competition Identification Number:</p> <input type="text"/> <p>Title:</p> <input type="text"/> | |
| <p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text" value="All Colorado Counties - ESG.pdf"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| <p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="State-administered Emergency Solutions Grant Program."/> | |
| <p>Attach supporting documents as specified in agency instructions.</p> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> | |

| Application for Federal Assistance SF-424 | |
|---|--|
| 16. Congressional Districts Of: | |
| * a. Applicant | CO-001 |
| * b. Program/Project | CO-a11 |
| Attach an additional list of Program/Project Congressional Districts if needed. | |
| All Colorado Counties - ESG.pdf | <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> |
| 17. Proposed Project: | |
| * a. Start Date: | 04/01/2022 |
| * b. End Date: | 03/31/2023 |
| 18. Estimated Funding (\$): | |
| * a. Federal | 2,128,974.00 |
| * b. Applicant | |
| * c. State | |
| * d. Local | |
| * e. Other | |
| * f. Program Income | |
| * g. TOTAL | 2,128,974.00 |
| * 19. Is Application Subject to Review By State Under Executive Order 12372 Process? | |
| <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . | |
| <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. | |
| <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372. | |
| * 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) | |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| If "Yes", provide explanation and attach | |
| <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
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| <input checked="" type="checkbox"/> ** I AGREE | |
| <small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small> | |
| Authorized Representative: | |
| Prefix: | Mr. |
| * First Name: | Rick |
| Middle Name: | M. |
| * Last Name: | Garcia |
| Suffix: | |
| * Title: | Executive Director |
| * Telephone Number: | 303-864-7861 |
| Fax Number: | |
| * Email: | rick.garcia@state.co.us |
| * Signature of Authorized Representative: | <div style="border: 2px solid red; padding: 5px; display: inline-block;"> Rick M. Garcia </div> Digitally signed by Rick M. Garcia Date: 2022.08.12 10:52:29 -06'00' |
| * Date Signed: | 08/12/2022 |

Areas Covered by the ESG, HOME, HTF programs
The whole state of Colorado including (counties):

| | |
|-------------|-------------------------|
| Adams | Moffat |
| Alamosa | Montezuma |
| Arapahoe | Montrose |
| Archuleta | Morgan |
| Baca | Otero |
| Bent | Ouray |
| Boulder | Park |
| Broomfield | Phillips |
| Chaffee | Pitkin |
| Cheyenne | Prowers |
| Clear Creek | Pueblo |
| Conejos | Rio Blanco |
| Costilla | Rio Grande |
| Crowley | Routt |
| Custer | Saguache |
| Delta | San Juan |
| Denver | San Miguel |
| Dolores | Sedgwick |
| Douglas | Summit |
| Eagle | Teller |
| Elbert | Washington |
| El Paso | Weld |
| Fremont | Yuma |
| Garfield | |
| Gilpin | |
| Grand | Congressional Districts |
| Gunnison | CO-001 through CO-007 |
| Hinsdale | |
| Huerfano | |
| Jackson | |
| Jefferson | |
| Kiowa | |
| Kit Carson | |
| Lake | |
| La Plata | |
| Larimer | |
| Las Animas | |
| Lincoln | |
| Logan | |
| Mesa | |
| Mineral | |

| Application for Federal Assistance SF-424 | | |
|--|--|--|
| * 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application | * 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision | * If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/> |
| * 3. Date Received: <input type="text" value="06/12/2022"/> | 4. Applicant Identifier: <input type="text"/> | |
| 5a. Federal Entity Identifier: <input type="text"/> | 5b. Federal Award Identifier: <input type="text"/> | |
| State Use Only: | | |
| 6. Date Received by State: <input type="text"/> | 7. State Application Identifier: <input type="text"/> | |
| B. APPLICANT INFORMATION: | | |
| * a. Legal Name: <input type="text" value="State of Colorado"/> | | |
| * b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="84-0644739"/> | * c. UEI: <input type="text" value="NUJ5 Q3DM 7U98"/> | |
| d. Address: | | |
| * Street1: <input type="text" value="1313 Sherman St. Suite 500"/> | | |
| Street2: <input type="text"/> | | |
| * City: <input type="text" value="Denver"/> | | |
| County/Parish: <input type="text"/> | | |
| * State: <input type="text" value="CO: Colorado"/> | | |
| Province: <input type="text"/> | | |
| * Country: <input type="text" value="USA: UNITED STATES"/> | | |
| * Zip / Postal Code: <input type="text" value="80203-2241"/> | | |
| e. Organizational Unit: | | |
| Department Name: <input type="text" value="Department of Local Affairs"/> | Division Name: <input type="text"/> | |
| f. Name and contact information of person to be contacted on matters involving this application: | | |
| Prefix: <input type="text"/> | * First Name: <input type="text" value="Connor"/> | |
| Middle Name: <input type="text"/> | | |
| * Last Name: <input type="text" value="Everson"/> | | |
| Suffix: <input type="text"/> | | |
| Title: <input type="text" value="Consolidated Plan Coordinator"/> | | |
| Organizational Affiliation: <input type="text"/> | | |
| * Telephone Number: <input type="text" value="303-864-7844"/> | Fax Number: <input type="text" value="303-864-7856"/> | |
| * Email: <input type="text" value="connor.everson@state.co.us"/> | | |

| Application for Federal Assistance SF-424 | |
|--|--|
| <p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="A: State Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/> | |
| <p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/> | |
| <p>11. Catalog of Federal Domestic Assistance Number:</p> <input type="text" value="14.239"/> <p>CFDA Title:</p> <input type="text" value="HOME Investment Partnerships Program"/> | |
| <p>* 12. Funding Opportunity Number:</p> <input type="text" value="N/A"/> <p>* Title:</p> <input type="text" value="N/A"/> | |
| <p>13. Competition Identification Number:</p> <input type="text"/> <p>Title:</p> <input type="text"/> | |
| <p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text" value="All Colorado Counties - HOME.pdf"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| <p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="State-administered HOME program."/> | |
| <p>Attach supporting documents as specified in agency instructions.</p> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> | |

| Application for Federal Assistance SF-424 | |
|---|--|
| 16. Congressional Districts Of: | |
| * a. Applicant | CO-001 |
| * b. Program/Project | CO-a11 |
| Attach an additional list of Program/Project Congressional Districts if needed. | |
| <input type="text" value="All Colorado Counties - HOME.pdf"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| 17. Proposed Project: | |
| * a. Start Date: | 04/01/2022 |
| * b. End Date: | 03/31/2023 |
| 18. Estimated Funding (\$): | |
| * a. Federal | 7,364,694.00 |
| * b. Applicant | |
| * c. State | |
| * d. Local | |
| * e. Other | |
| * f. Program Income | |
| * g. TOTAL | 7,364,694.00 |
| * 19. Is Application Subject to Review By State Under Executive Order 12372 Process? | |
| <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . | |
| <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. | |
| <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372. | |
| * 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) | |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| If "Yes", provide explanation and attach | |
| <input type="text"/> | <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> |
| 21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) | |
| <input checked="" type="checkbox"/> ** I AGREE | |
| <small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small> | |
| Authorized Representative: | |
| Prefix: | Mr. |
| * First Name: | Rick |
| Middle Name: | M. |
| * Last Name: | Garcia |
| Suffix: | |
| * Title: | Executive Director |
| * Telephone Number: | 303-864-7861 |
| Fax Number: | |
| * Email: | rick.garcia@state.co.us |
| * Signature of Authorized Representative: | <div style="border: 2px solid red; padding: 5px; display: inline-block;"> Rick M. Garcia </div> Digitally signed by Rick M. Garcia Date: 2022.08.12 10:52:58 -06'00' |
| * Date Signed: | 08/12/2022 |

Areas Covered by the HOME and HTF programs
The whole state of Colorado including (counties):

| | |
|-------------|-------------------------|
| Adams | Moffat |
| Alamosa | Montezuma |
| Arapahoe | Montrose |
| Archuleta | Morgan |
| Baca | Otero |
| Bent | Ouray |
| Boulder | Park |
| Broomfield | Phillips |
| Chaffee | Pitkin |
| Cheyenne | Prowers |
| Clear Creek | Pueblo |
| Conejos | Rio Blanco |
| Costilla | Rio Grande |
| Crowley | Routt |
| Custer | Saguache |
| Delta | San Juan |
| Denver | San Miguel |
| Dolores | Sedgwick |
| Douglas | Summit |
| Eagle | Teller |
| Elbert | Washington |
| El Paso | Weld |
| Fremont | Yuma |
| Garfield | |
| Gilpin | |
| Grand | Congressional Districts |
| Gunnison | CO-001 through CO-007 |
| Hinsdale | |
| Huerfano | |
| Jackson | |
| Jefferson | |
| Kiowa | |
| Kit Carson | |
| Lake | |
| La Plata | |
| Larimer | |
| Las Animas | |
| Lincoln | |
| Logan | |
| Mesa | |
| Mineral | |

| Application for Federal Assistance SF-424 | | |
|--|--|--|
| * 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application | * 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision | * If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/> |
| * 3. Date Received: 06/12/2022 | 4. Applicant Identifier: <input type="text"/> | |
| 5a. Federal Entity Identifier: <input type="text"/> | 5b. Federal Award Identifier: <input type="text"/> | |
| State Use Only: | | |
| 6. Date Received by State: <input type="text"/> | 7. State Application Identifier: <input type="text"/> | |
| B. APPLICANT INFORMATION: | | |
| * a. Legal Name: State of Colorado | | |
| * b. Employer/Taxpayer Identification Number (EIN/TIN): 84-0644739 | * c. UEI: NUJ5 Q3DW 7098 | |
| d. Address: | | |
| * Street1: 1313 Sherman St. Suite 500 | <input type="text"/> | |
| Street2: <input type="text"/> | <input type="text"/> | |
| * City: Denver | <input type="text"/> | |
| County/Parish: <input type="text"/> | <input type="text"/> | |
| * State: CO: Colorado | <input type="text"/> | |
| Province: <input type="text"/> | <input type="text"/> | |
| * Country: USA: UNITED STATES | <input type="text"/> | |
| * Zip / Postal Code: 80203-2241 | <input type="text"/> | |
| e. Organizational Unit: | | |
| Department Name: Department of Local Affairs | Division Name: <input type="text"/> | |
| f. Name and contact information of person to be contacted on matters involving this application: | | |
| Prefix: <input type="text"/> | * First Name: Connor | <input type="text"/> |
| Middle Name: <input type="text"/> | <input type="text"/> | |
| * Last Name: Everson | <input type="text"/> | |
| Suffix: <input type="text"/> | <input type="text"/> | |
| Title: Consolidated Plan Coordinator | | |
| Organizational Affiliation: <input type="text"/> | | |
| * Telephone Number: 303-864-7844 | Fax Number: 303-864-7856 | |
| * Email: connor.everson@state.co.us | | |

| Application for Federal Assistance SF-424 | |
|--|--|
| <p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="A: State Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/> | |
| <p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/> | |
| <p>11. Catalog of Federal Domestic Assistance Number:</p> <input type="text" value="14.241"/> <p>CFDA Title:</p> <input type="text" value="Housing Opportunities for Persons with AIDS"/> | |
| <p>* 12. Funding Opportunity Number:</p> <input type="text" value="N/A"/> <p>* Title:</p> <input type="text" value="N/A"/> | |
| <p>13. Competition Identification Number:</p> <input type="text"/> <p>Title:</p> <input type="text"/> | |
| <p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text" value="HOPMA Counties for 424.pdf"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| <p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="State-administered Housing Opportunities for Persons with AIDS Program."/> | |
| <p>Attach supporting documents as specified in agency instructions.</p> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> | |

| Application for Federal Assistance SF-424 | |
|---|--|
| 16. Congressional Districts Of: | |
| * a. Applicant | CO-001 |
| * b. Program/Project | CO-var |
| Attach an additional list of Program/Project Congressional Districts if needed. | |
| <input type="text" value="HOPMA Counties for 424.pdf"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| 17. Proposed Project: | |
| * a. Start Date: | 04/01/2022 |
| * b. End Date: | 03/31/2023 |
| 18. Estimated Funding (\$): | |
| * a. Federal | 1,100,663.00 |
| * b. Applicant | |
| * c. State | |
| * d. Local | |
| * e. Other | |
| * f. Program Income | |
| * g. TOTAL | 1,100,663.00 |
| * 19. Is Application Subject to Review By State Under Executive Order 12372 Process? | |
| <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . | |
| <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. | |
| <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372. | |
| * 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) | |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
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| Authorized Representative: | |
| Prefix: | Mr. |
| * First Name: | Rick |
| Middle Name: | M. |
| * Last Name: | Garcia |
| Suffix: | |
| * Title: | Executive Director |
| * Telephone Number: | 303-864-7861 |
| Fax Number: | |
| * Email: | rick.garcia@state.co.us |
| * Signature of Authorized Representative: | <div style="border: 2px solid red; padding: 5px; display: inline-block;"> Rick M. Garcia </div> Digitally signed by Rick M. Garcia Date: 2022.08.12 10:53:28 -06'00' |
| * Date Signed: | 08/12/2022 |

Areas Covered by the HOPWA program
The whole state of Colorado including (counties):

Alamosa
Archuleta
Baca
Bent
Boulder
Chaffee
Cheyenne
Conejos
Costilla
Crowley
Custer
Delta
Dolores
Eagle
Elbert
Fremont
Garfield
Grand
Gunnison
Hinsdale
Huerfano
Jackson
Kiowa
Kit Carson
Lake
La Plata
Larimer
Las Animas
Lincoln

Logan
Mesa
Mineral
Moffat
Montezuma
Montrose
Morgan
Otero
Ouray
Phillips
Pitkin
Prowers
Pueblo
Rio Blanco
Rio Grande
Routt
Saguache
San Juan
San Miguel
Sedgwick
Summit
Teller
Washington
Weld
Yuma

Congressional Districts CO-002, CO-003, CO-004 and CO-005

| Application for Federal Assistance SF-424 | | |
|--|--|--|
| * 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application | * 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision | * If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/> |
| * 3. Date Received: <input type="text" value="08/12/2022"/> | 4. Applicant Identifier: <input type="text"/> | |
| 5a. Federal Entity Identifier: <input type="text"/> | 5b. Federal Award Identifier: <input type="text"/> | |
| State Use Only: | | |
| 6. Date Received by State: <input type="text"/> | 7. State Application Identifier: <input type="text"/> | |
| B. APPLICANT INFORMATION: | | |
| * a. Legal Name: <input type="text" value="State of Colorado"/> | | |
| * b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="84-0644739"/> | * c. UEI: <input type="text" value="N0J5 Q3DW 709e"/> | |
| d. Address: | | |
| * Street1: <input type="text" value="1313 Sherman St. Suite 500"/> | <input type="text"/> | |
| Street2: <input type="text"/> | <input type="text"/> | |
| * City: <input type="text" value="Denver"/> | <input type="text"/> | |
| County/Parish: <input type="text"/> | <input type="text"/> | |
| * State: <input type="text" value="CO: Colorado"/> | <input type="text"/> | |
| Province: <input type="text"/> | <input type="text"/> | |
| * Country: <input type="text" value="USA: UNITED STATES"/> | <input type="text"/> | |
| * Zip / Postal Code: <input type="text" value="80203-2241"/> | <input type="text"/> | |
| e. Organizational Unit: | | |
| Department Name: <input type="text" value="Department of Local Affairs"/> | Division Name: <input type="text"/> | |
| f. Name and contact information of person to be contacted on matters involving this application: | | |
| Prefix: <input type="text"/> | * First Name: <input type="text" value="Connor"/> | <input type="text"/> |
| Middle Name: <input type="text"/> | <input type="text"/> | |
| * Last Name: <input type="text" value="Everson"/> | <input type="text"/> | |
| Suffix: <input type="text"/> | <input type="text"/> | |
| Title: <input type="text" value="Consolidated Plan Coordinator"/> | | |
| Organizational Affiliation: <input type="text"/> | | |
| * Telephone Number: <input type="text" value="303-864-7844"/> | Fax Number: <input type="text" value="303-864-7856"/> | |
| * Email: <input type="text" value="connor.everson@state.co.us"/> | | |

| Application for Federal Assistance SF-424 | |
|--|--|
| <p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="A: State Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/> | |
| <p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/> | |
| <p>11. Catalog of Federal Domestic Assistance Number:</p> <input type="text" value="14.275"/> <p>CFDA Title:</p> <input type="text" value="Housing Trust Fund Program"/> | |
| <p>* 12. Funding Opportunity Number:</p> <input type="text" value="N/A"/> <p>* Title:</p> <input type="text" value="N/A"/> | |
| <p>13. Competition Identification Number:</p> <input type="text"/> <p>Title:</p> <input type="text"/> | |
| <p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text" value="All Colorado Counties - HTF.pdf"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| <p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="State-administered HTF program"/> | |
| <p>Attach supporting documents as specified in agency instructions.</p> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> | |

| Application for Federal Assistance SF-424 | |
|---|--|
| 16. Congressional Districts Of: | |
| * a. Applicant | CO-001 |
| * b. Program/Project | CO-a11 |
| Attach an additional list of Program/Project Congressional Districts if needed. | |
| <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| 17. Proposed Project: | |
| * a. Start Date: | 04/01/2022 |
| * b. End Date: | 03/31/2023 |
| 18. Estimated Funding (\$): | |
| * a. Federal | 10,917,121.00 |
| * b. Applicant | |
| * c. State | |
| * d. Local | |
| * e. Other | |
| * f. Program Income | |
| * g. TOTAL | 10,917,121.00 |
| * 19. Is Application Subject to Review By State Under Executive Order 12372 Process? | |
| <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . | |
| <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. | |
| <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372. | |
| * 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) | |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| If "Yes", provide explanation and attach | |
| <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| 21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) | |
| <input checked="" type="checkbox"/> ** I AGREE | |
| ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions. | |
| Authorized Representative: | |
| Prefix: | Mr. |
| * First Name: | Rick |
| Middle Name: | M. |
| * Last Name: | Garcia |
| Suffix: | |
| * Title: | Executive Director |
| * Telephone Number: | 303-864-7861 |
| Fax Number: | |
| * Email: | rick.garcia@state.co.us |
| * Signature of Authorized Representative: | <div style="border: 2px solid red; padding: 5px; display: inline-block;"> Rick M. Garcia Digitally signed by Rick M. Garcia Date: 2022.08.12 10:53:55 -06'00' </div> |
| * Date Signed: | 08/12/2022 |

Areas Covered by the HOME and HTF programs
The whole state of Colorado including (counties):

| | |
|-------------|-------------------------|
| Adams | Moffat |
| Alamosa | Montezuma |
| Arapahoe | Montrose |
| Archuleta | Morgan |
| Baca | Otero |
| Bent | Ouray |
| Boulder | Park |
| Broomfield | Phillips |
| Chaffee | Pitkin |
| Cheyenne | Prowers |
| Clear Creek | Pueblo |
| Conejos | Rio Blanco |
| Costilla | Rio Grande |
| Crowley | Routt |
| Custer | Saguache |
| Delta | San Juan |
| Denver | San Miguel |
| Dolores | Sedgwick |
| Douglas | Summit |
| Eagle | Teller |
| Elbert | Washington |
| El Paso | Weld |
| Fremont | Yuma |
| Garfield | |
| Gilpin | |
| Grand | Congressional Districts |
| Gunnison | CO-001 through CO-007 |
| Hinsdale | |
| Huerfano | |
| Jackson | |
| Jefferson | |
| Kiowa | |
| Kit Carson | |
| Lake | |
| La Plata | |
| Larimer | |
| Las Animas | |
| Lincoln | |
| Logan | |
| Mesa | |
| Mineral | |



COLORADO
Department of Local Affairs
Office of the Executive Director

MEMORANDUM

To: Noemi Ghirghi, Director
HUD Office of Community Planning and Development, Region VIII

Cc: Don Morris, Senior Community Development Representative
HUD Office of Community Planning and Development, Region VIII

From: Rick M. Garcia, Executive Director
Colorado Department of Local Affairs

Date: August 12, 2022

Re: Assurances - Construction Programs

On behalf of the State of Colorado, the Department of Local Affairs (DOLA) administers federal formula grant programs provided through the U.S. Department of Housing and Urban Development (HUD), Office of Community Planning and Development (CPD). These include the Community Development Block Grant, Emergency Solutions Grant, Home Investment Partnerships, Housing Opportunities for Persons With Aids, and National Housing Trust Fund programs. This year, HUD has requested that we execute a new Office of Management and Budget form titled, "Assurances - Construction Programs" in order for it to approve DOLA's 2020-24 Consolidated Plan and issue Colorado's grant agreements for these programs.

The form includes a note near the top that certain assurances may not be applicable. Some sections that we do not believe apply contain language limiting their reach to the requirements of the awarding agency, so we do not object to those. However, part of Section 5 includes no such caveat, and we do not believe the section applies. It asks the DOLA authorized representative to certify that it:

"Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State."

DOLA cannot assure HUD that it will comply with this provision. The Department does not employ and has no intention of hiring engineers for the purpose of supervising construction projects funded with HUD CPD formula grants. We have thus excluded this section from Colorado's assurances.

Sincerely,
Rick M. Garcia

Governor Jared S. Polis | Rick M. Garcia, Executive Director
1313 Sherman St., Room 521, Denver, CO 80203 P 303.864.7720 TDD/TYY 303.864.7758 www.dola.colorado.gov
Strengthening Colorado Communities



CDBG 2022

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. ~~Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.~~
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-97)
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

| | |
|---|-----------------------------|
| SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL  Digitally signed by Rick M. Garcia Date: 2022.08.12 10:54:20 -06'00' | TITLE Executive Director |
| APPLICANT ORGANIZATION State of Colorado | DATE SUBMITTED 8/12/2022 |

SF-424D (Rev. 7-97) Back

ESG 2022

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
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| | |
|---|---------------------------|
| SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL | TITLE |
| Rick M. Garcia <small>Digitally signed by Rick M. Garcia Date: 2022.08.12 10:54:39 -06'00'</small> | Executive Director |
| APPLICANT ORGANIZATION | DATE SUBMITTED |
| State of Colorado | 8/12/2022 |

SF-424D (Rev. 7-97) Back

HOME 2022

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
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13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

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| SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL | TITLE |
| Rick M. Garcia Digitally signed by Rick M. Garcia Date: 2022.08.12 10:55:08 -06'00' | Executive Director |
| APPLICANT ORGANIZATION | DATE SUBMITTED |
| State of Colorado | 8/12/2022 |

SF-424D (Rev. 7-97) Back

HOPWA 2022

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. ~~Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.~~
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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Prescribed by OMB Circular A-102

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14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
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| SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL  | TITLE Executive Director |
| APPLICANT ORGANIZATION State of Colorado | DATE SUBMITTED 8/12/2022 |

SF-424D (Rev. 7-97) Back

HTF 2022

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. ~~Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.~~
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19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
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| SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL  | TITLE Executive Director |
| APPLICANT ORGANIZATION State of Colorado | DATE SUBMITTED 8/12/2022 |

SF-424D (Rev. 7-97) Back

STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the State's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-L.L.L., "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the State's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

Rick M. Garcia Open signature line to state
Date 8/12/2022 14:44:50

Signature of Authorized Official

Executive Director

Title

8/12/2022

Date

Specific Community Development Block Grant Certifications

The State certifies that:

Citizen Participation -- It is following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

Consultation with Local Governments --

1. It has consulted with affected units of local government in the nonentitlement area of the State in determining the method of distribution of funding;
2. It engages in or will engage in planning for community development activities;
3. It provides or will provide technical assistance to units of local government in connection with community development programs; and
4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

Local Needs Identification -- It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available.
2. Overall Benefit. In the aggregate, not less than 70 percent of the CDBG funds, including Section 108 guaranteed loans, received by the State during the following fiscal year(s) 2022-23 [a period designated by the State of one, two, or three specific consecutive fiscal year(s)] will be used for activities that benefit persons of low and moderate income.

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG Funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Compliance with Laws -- It will comply with applicable laws.

Digitally signed by Rick M. Garcia
Date: 2022.08.12 10:56:25 -0700
Rick M. Garcia

Signature of Authorized Official

8/12/2022

Date

Executive Director

Title

Specific HOME Certifications

The State certifies that:

Tenant Based Rental Assistance -- If it plans to use HOME funds for tenant-based rental assistance, tenant-based rental assistance is an essential element of the State's consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy Layering -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

Rick M. Garcia Digitally signed by Rick M. Garcia
Date: 2022.08.12 10:56:41 -0600

8/12/2022

Signature of Authorized Official

Date

Executive Director

Title

Emergency Solutions Grant Certifications

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

Matching Funds – The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).

Discharge Policy – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Confidentiality – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

Major rehabilitation/conversion/renovation – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for such individuals.

Homeless Persons Involvement – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

Consolidated Plan – All activities the subrecipient undertakes with assistance under ESG are consistent with the State’s current HUD-approved consolidated plan.

Rick M. Garcia Digitally signed by Rick M. Garcia
Date: 2022.08.12 10:57:18 -0500

8/12/2022

Signature of Authorized Official

Date

Executive Director

Title

Housing Opportunities for Persons With AIDS Certifications

The State HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under the program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years, in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,
2. For a period of not less than 3 years, in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Rick M. Garcia Digitally signed by Rick M. Garcia
Date: 2022.08.12 10:57:35 -0500

8/12/2022

Signature of Authorized Official

Date

Executive Director

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

HOME-ARP

State of Colorado HOME-ARP Allocation Plan

Guidance

- To receive its HOME-ARP allocation, a PJ must:
 - Engage in consultation with at least the required organizations;
 - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further Fair Housing;
 - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - Anti-Lobbying;
 - Authority of Jurisdiction;
 - Section 3; and,
 - HOME-ARP specific certification.

Participating Jurisdiction: State of Colorado, Department of Local Affairs (Colorado Non-Entitlement)

Date: January 28, 2022

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

The State of Colorado’s Department of Local Affairs Division of Housing (DOH) provided several opportunities for consultation regarding the HOME-ARP plan. Specifically, DOH held a

consultation webinar on December 2, 2021 with several stakeholders. This included an overview of the HOME-ARP program, an overview of key data points regarding housing and homeless needs in Colorado, the State’s overall strategy regarding housing and homelessness, and suggested questions to foster input and questions from the participants. DOH also participated in other meetings to receive consultation, including November 18, 2021 with various supportive housing and homeless services providers, December 13, 2021 with Colorado NAHRO board and members, and January 7, 2022 with fair housing experts. All stakeholders were invited to the December 2, 2021 consultation. Any later date meetings occurred for those stakeholders that could not attend December 2. DOH also provided welcome invitations to input from stakeholders on an individual basis to ensure partners had the ability to share their input. This included letters, emails, conference calls.

List the organizations consulted, and summarize the feedback received from these entities.

| Agency/Org Consulted | Type of Agency/Org | Method of Consultation | Feedback |
|--|-------------------------------------|------------------------|--|
| Karis Inc. | Homeless service provider for youth | 12/2/21 Webinar | More funding is required for youth experiencing homelessness, supportive housing development and operations, and shelter rehabilitation. |
| Family Promise of Colorado Springs | Homeless service provider | 12/2/21 Webinar | |
| The Gathering Place | Homeless service provider | 12/2/21 Webinar | Supportive services for participants not residing in supportive housing. Provide housing assistance to persons currently being assisted with time limited funds (UST CRF, HUD ESG-CV ETC.). Funding for short-term homeless prevention without services or persistent support. |
| Homeward Bound of Grand Valley | Homeless service provider | 12/2/21 Webinar | |
| Growing Home | Homeless service provider | 12/2/21 Webinar | |
| Response (Aspen) | Homeless service provider | 12/2/21 Webinar | |
| Eagle County Housing and Development Authority | Public housing authority | 12/2/21 Webinar | |
| Homeward Pikes Peak | Homeless service provider | 12/2/21 Webinar | Supportive services are important for the success of program participants, |

| | | | |
|--|--|-----------------|--|
| | | | but more funding is required. Colorado should change its policies and procedures as such that more PSH may be developed. |
| City of Aurora | Public agency that addresses the needs of qualifying populations | 12/2/21 Webinar | Funding for supportive services for residents of SH developments is required |
| Posada | Homeless service provider and housing provider | 12/2/21 Webinar | |
| United Way of Weld County | Homeless service provider, Private philanthropy | 12/2/21 Webinar | There is a need for rapid rehousing rental assistance |
| YWCA of Pueblo County | Homeless service provider | 12/2/21 Webinar | |
| Almost Home | Homeless service provider | 12/2/21 Webinar | |
| Safehouse Progressive Alliance for Nonviolence | Domestic violence service provider | 12/2/21 Webinar | |
| Montrose County Housing Authority | Public housing authority | 12/2/21 Webinar | |
| Family Housing Network | Homeless service provider | 12/2/21 Webinar | New supportive housing developments for families, as opposed to other populations. |
| Evergreen Christian Outreach | Homeless service provider | 12/2/21 Webinar | Need for RRH, housing navigation, and SH for shelter stayers. Long term supportive services needed for developments, and tenants. Reimbursable grants are operationally challenging. |
| TGTHR (Boulder) | Homeless service provider | 12/2/21 Webinar | Rental assistance, services, and development for youth experiencing homelessness. Funding for behavioral health services is required in addition to case management funding. |
| Safe Shelter of St. Vrain Valley | Domestic violence service provider | 12/2/21 Webinar | |

| | | | |
|---|---|-----------------|---|
| Community Health Partnership | Continuum of Care, Homeless service provider | 12/2/21 Webinar | |
| Colorado Coalition for the Homeless | Continuum of Care, Homeless service provider, Supportive Housing developer and operator | 12/2/21 Webinar | HOME-ARP funding should be used as such that it maximizes the strength of its statutory and regulatory limitations. Funds should improve the situations of racial and ethnic minorities. |
| Help for Abused Partners | Domestic violence service provider | 12/2/21 Webinar | |
| SAFER Shelter | Homeless service provider for justice system involved with behavioral health needs | 12/2/21 Webinar | Need for housing for people with complex co-occurring needs. Supportive services funding should cover all of the services needs of individuals. Colorado should make lump sum grants instead of reimbursable. |
| Jefferson Center for Mental Health | Community mental health center; voucher administrator; supportive housing provider | 12/2/21 Webinar | There is a need for supportive services funding, and more affordable housing development |
| The Delores Project | Homeless services, shelter, and supportive and affordable housing provider | 12/2/21 Webinar | |
| Family Tree | Homeless services provider | 12/2/21 Webinar | |
| Pueblo County | Public agency that addresses the needs of qualifying populations | 12/2/21 Webinar | |
| Volunteers of America - Colorado Branch | Veterans group; Homeless | 12/2/21 Webinar | |

| | | | |
|---------------------------------------|---|---------------------------------|--|
| | services provider | | |
| Housing Resources of Western Colorado | Housing developer and housing services provider | 12/2/21 Webinar | |
| Community Reach Center | Community mental health center; voucher administrator | 12/2/21 Webinar | More accessible housing units are required. |
| Self - Contract Grant Writer | | 12/2/21 Webinar | HUD requirements create a disconnect between individual and community needs and what may be done under HUD regulations. Colorado should provide non-profits with enough time to apply for grant funds, and should make decisions on those applications quickly. |
| Colorado NAHRO Board | Colorado Public Housing Authorities | 12/13/21 CO NAHRO Board Meeting | Resources to create more housing in general are needed. Services are needed for tenants with special needs. Should take into consideration other funding resources when prioritizing these funds. |
| Disability Law Colorado | Fair Housing experts/disability advocates | 1/7/22 Meeting | Supportive Services funding is important as is developing additional housing. Both need to ensure access - programmatically and in physical space. Encourage the state to find ways to use these funds to incentivize creating as many accessible units as possible. Services funding should require staff are trained on reasonable accommodations. |
| Denver Office of Housing Stability | Local Government | 11/18/21 Webinar | Supportive Services funding is an excellent use of HOME-ARP. Denver HOST supports this proposal. Thank you for your creativity. |
| Enterprise Community Partners | Affordable Housing Investor | 11/18/21 Webinar | From Enterprise's perspective, we agree: high need to fund supportive services and ensuring there is funding available now/soon while longer term solutions come online. We appreciate |

| | | | |
|---|------------------------------|------------------|--|
| | | | DOH finding alternate funding sources for this and support an appropriate proportion of HOME ARPA \$ being dedicated here. |
| Jefferson County Human Services | Local Government | 11/18/21 Webinar | Yes, we support using HOME ARP funding for Supportive Services. Thank you. |
| CASA of the 7th Judicial District | Homeless Service Provider | 11/18/21 Webinar | HOME-ARP for Supportive Services is a great idea. |
| The Center for Developmental Disabilities | Disability Service Provider | 11/18/21 Webinar | Yes! We support HOME-ARP for Supportive Services. |
| Children's Medical Center | Healthcare Provider | 11/18/21 Webinar | We support HOME-ARP for Supportive Services. |
| Jefferson Center for Mental Health | Mental Health Provider | 11/18/21 Webinar | Jefferson Center supports using HOME ARP funding for this purpose! |
| Homeward Pikes Peak | Homeless Service Provider | 11/18/21 Webinar | HOME ARP funds is a good idea for tenant support services |
| Beaux Simone Consulting | Affordable Housing Developer | 11/18/21 Webinar | Yes, definitely support using HOME ARP funds. |
| St. Francis Center | Homeless Service Provider | 11/18/21 Webinar | St. Francis Center supports HOME ARP funds for Supportive Services |
| Centennial Mental Health Center | Mental Health Provider | 11/18/21 Webinar | We are in support of using HOME ARP funds for supportive services |
| Blueline Development | Affordable Housing Developer | 11/18/21 Webinar | We support using HOME ARP funds for supportive services |
| Family Tree | Homeless Service Provider | 11/18/21 Webinar | Family Tree agrees with using HOME-ARP for supportitve services |
| Urban Ventures | Affordable Housing Developer | 11/18/21 Webinar | Supportive Services funding will help single site supportive housing projects cash flow in later years |
| Montrose County | Public Housing Authority | 11/18/21 Webinar | Certainly need the HOME ARP funds |

| | | | |
|-------------------|---|---|---|
| Housing Authority | | | for services. Also wanted to commend you all for your creativity to bring more funds for services long term but we have to ask you to help us in the short term applications. |
| Letter campaign | 80 various housing and homeless provider agencies | Letter campaign during consultation timeframe | Highlighted need for services funding for supportive housing projects, mainly those in the development pipeline. Requested ARPA funds be prioritized for these services. |

Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of no less than 15 calendar days. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold at least one public hearing during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive,
- The range of activities the PJ may undertake.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- **Public comment period:** December 10, 2021 - December 26, 2021
- **Public hearing:** December 17, 2021

DOH held a webinar for the public hearing open to any and all of the public who wished to attend. The meeting provided similar information as the consultation discussions noted above and included an overview of the DOH spend plan draft that was posted on DOH’s website on December 10, 2021, and was shared via an DOH email blast. The meeting was then opened up for questions and comments. DOH staff ensured they responded to every comment or question raised and recorded the comments.

Describe any efforts to broaden public participation:

Notice of the public hearing date, time and call-in information was shared at the various consultation meetings that occurred before it, at various meetings DOH attended, and via three (3) DOH email blasts to over 2,700 listserv email addresses on [12/03/2021](#), [12/20/2021](#), and

12/23/2021. DOH staff forwarded information regarding the hearing with ESG sub-recipients and the State Emergency Operation Center's Homeless Task Force. The meeting was held virtually to ensure that as many people could attend as possible without barriers of travel and due to public health recommendations to limit congregating people due to the COVID-19 pandemic. Notice of the meeting was provided in English and Spanish. Interpreters for the meeting were offered as well. Participants were also provided DOH staff contact information and encouraged to contact staff outside of the meeting if they preferred or if they had comments or questions at another time. Participants could raise their hands to provide comments verbally during the meeting or in the chats section of the platform, depending on their preference or connectivity.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

Commenters mentioned that the allocation of HOME-ARP funding towards supportive services and supportive housing development are important priorities as this funding will leverage other existing funding streams, while providing a unique opportunity to fund under-resourced activities. Also, commenters questioned whether the allocation of HOME-ARP funds proposed towards supportive services was sufficient for the need and if other federal and state funding sources can support this need. Appreciation was affirmed that potential recipients were engaged in the consultation process and that this funding will be put towards priorities that these potential recipients raised.

Summarize any comments or recommendations not accepted and state the reasons why:
Commenters suggested the following:

1. The budget allocated to administration should be reduced from 15% of the total allocation to a lower amount because such a level of administrative funds is not required for the State of Colorado to allocate its HOME-ARP funds.
 - a. This comment is not accepted. This is because the State of Colorado is required by federal law and regulation to provide ongoing assistance to HOME-ARP grantees and borrowers long after an award has been made so that grantees and borrowers may comply with complex federal requirements, and so that the State can verify whether funds are being used effectively and effect changes if they are not. Additionally, the Administration budget line item includes administrative funds that will be used by HOME-ARP subrecipients, not the State, to fund their own operations. This comment is not accepted because reducing the budget for Administration would be contrary to the interests of the State and its customers, have a deleterious effect on the ability of community based service providers to end homelessness, and would hamper the ability of the State to assist these

organizations and to ensure that HOME-ARP funds are having a maximum impact.

2. The budget allocated to non-congregate shelter development is insufficient compared to the need.
 - a. This comment is not accepted. The HOME-ARP allocation is not sufficient compared to the need for any of the eligible activities. The State is planning to use other ARP treasury funds to fund the development of shelter and housing. The HOME-ARP funds are not the only source for this activity.
3. The budget allocated to tenant based rental assistance/rapid re-housing is insufficient compared to the need.
 - a. This comment is not accepted. This is because HUD allocated about \$55.8 million in Emergency Solutions Grant Coronavirus (ESG-CV) funds to three localities and the State of Colorado in 2020, much of which was used for rapid re-housing. Additionally, The U.S. Department of the Treasury allocated about \$514 million in Emergency Rental Assistance funds to 11 localities and the State of Colorado which may be used for this purpose. This comment is not accepted because allocating HOME-ARP funds in this way be contrary to the interests of the State and its customers because tenant based rental assistance and rapid re-housing have already been received significant infusions of funding in recent years, and this is the first opportunity to do so for supportive services.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

| Homeless | | | | | | | | | | | | | |
|------------------------------|-------------------|------------|-------------|------------|-----------|------------------------------|----------------------|------|---------------|--------------|------------|-------------|------------|
| | Current Inventory | | | | | Homeless Population | | | | Gap Analysis | | | |
| | Family | | Adults Only | | Vets | Family HH (at least 1 child) | Adult HH (w/o child) | Vets | Victims of DV | Family | | Adults Only | |
| | # of Beds | # of Units | # of Beds | # of Units | # of Beds | | | | | # of Beds | # of Units | # of Beds | # of Units |
| Emergency Shelter | 1257 | 589 | 3797 | n/a | 24 | | | | | | | | |
| Transitional Housing | 1851 | 542 | 1277 | n/a | 297 | | | | | | | | |
| Permanent Supportive Housing | 951 | 448 | 4119 | n/a | 2223 | | | | | | | | |
| Other Permanent Housing | | | | | | 507 | 1007 | 29 | n/a | | | | |
| Sheltered Homeless | | | | | | 779 | 3764 | 397 | 552 | | | | |
| Unsheltered Homeless | | | | | | 164 | 2741 | 348 | 200 | | | | |
| Current Gap | | | | | | | | | | unk | 943 | unk | 6505 |

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

Data Sources Used: 2020 HIC and PIT

OPTIONAL Housing Needs Inventory and Gap Analysis Table

| Non-Homeless | | | |
|---|-------------------|-----------------|-----------------|
| | Current Inventory | Level of Need | Gap Analysis |
| | # of Units | # of Households | # of Households |
| Total Rental Units | 779,700 | | |
| Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness) | 79,200 | | |
| Rental Units Affordable to HH at 50% AMI (Other Populations) | 157,000 | | |
| 0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness) | | 113,240 | |
| 30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations) | | 53,590 | |
| Current Gaps | | | 166,830 |

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Within the State's boundaries, which is the entire state of Colorado, we have the following data regarding the HOME-ARP qualifying populations:

9,846 people were counted as meeting the HUD definition for literal homeless, residing in shelters, transitional housing, or unsheltered, during the 2020 HUD Point in Time Count in January 2020. In addition, per the Corporation for Supportive Housing ([CSH](#)), over 14,600 individuals are estimated to need supportive housing within Colorado. According to the Colorado Department of Education's McKinney-Vento school district data, over 21,000 students experienced housing instability or homelessness during the 2019-2020 school year. The State's Medicaid enrollment data shows that over 53,000 individuals in Colorado in 2019 reported experiencing homelessness or housing instability at the time of enrollment in Medicare or Medicaid.

Other data indicates an increase in homelessness in Colorado during this pandemic. For example, Denver shelters saw a 99% increase in people experiencing homelessness for the first time between January 2020 and January 2021 and approximately a 40% increase in shelter population overall. At the same time, the unsheltered numbers have appeared to stay the same and even increase. Other parts of the state and several providers and local governments also report increases in housing instability and homelessness.

As the [CDC](#) states, many of the public health recommendations during the COVID-19 pandemic have been difficult to follow for those experiencing homelessness. People without housing are commonly served in congregate settings and struggle to have consistent medical care during their unpredictable housing crisis. Therefore, people experiencing homelessness are more at risk of infection and one of the more at-risk populations for complications, hospitalization, and death if infected.

Those experiencing homelessness have been and continue to be disproportionately people of color with low or extremely low incomes. In Colorado, people who identify as Black make up 4% of the population, but represent 7% of Coloradans living in poverty and 17% of those living without housing. People who identify as Native American/Alaskan, make up 1% of Colorado's population, but represent 2% of Coloradans living in poverty and 6% of those living without housing. People who identify as Latino/Hispanic make up 21% of the population, but represent 36% of Coloradans living in poverty and 23% of those living without housing. These and other BIPOC populations are the same populations who have been disproportionately impacted by this public health and economic crisis. The Center on Budget and Policy Priorities ([CBPP](#)) shared on November 10, 2021 that the impacts of the pandemic and economic recession remain "particularly prevalent among Black adults, Latino adults, and other people of color. These disproportionate impacts reflect harsh, long-standing inequities - often stemming from structural

racism - in education, employment, housing and health care that the current crisis has exacerbated.”

It is also estimated that persons experiencing homelessness infected with COVID-19 are twice as likely to be hospitalized, two to four times as likely to require critical care, and two to three times as likely to die from the illness compared to the general population.

By serving individuals experiencing homelessness, the grants will ensure the basic needs of the Coloradans who are the most food insecure, housing insecure, and lowest of income are met. In turn, the individuals can focus on healing and then working towards stability and re-entry into the community, including work and housing.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- Sheltered and unsheltered homeless populations;
- Those currently housed populations at risk of homelessness;
- Other families requiring services or housing assistance or to prevent homelessness; and,
- Those at greatest risk of housing instability or in unstable housing situations:

Please review the Demographic Composition of Qualifying Population response above regarding sheltered and unsheltered populations and the impact of COVID-19 on those populations. As estimated by the Corporation for Supportive Housing (CSH), Colorado pre-pandemic needs over 14,600 units of Supportive Housing. A significant challenge to meeting that need is the lack of sustainable, consistent funding for housing-focused services paired directly with housing resources. The State is working closely across agencies to create a housing services funding model over the next three years, but services resources are an identified gap for ensuring people living in shelters or unsheltered are able to successfully secure housing and maintain housing. For Supportive Housing that receives services funding alongside rental assistance from the Division of Housing, at least 85% maintain housing. Housing stability rates are significantly less for many programs without direct services funding.

The specific services needed include housing navigation and counseling, landlord liaison, daily living skills, eviction prevention, connection to benefits, vocational supports, medical and behavioral health care, family reunification, and other supports necessary to assist a person in maintaining housing safely.

According to Week 40 of the Census Bureau’s Household Pulse Survey, an estimated 110,000 persons in Colorado were behind on their housing payments in early-December 2021, 133,000 had no confidence in their ability to pay for housing in January 2022, and 69,000 persons thought they were somewhat or very likely to leave their home due to eviction or foreclosure. Margin or error due to small sample sizes makes it difficult to measure the extent to which certain demographics in Colorado are housing-challenged.

However, national data suggests that households identifying as Black or African American are nearly 4x as likely as white non-hispanic households to be behind on their housing payments, hispanic persons of any race are 3x as likely; low-income households earning less than \$25,000 per year are 5x as likely as moderate income households earning \$75,000 or more to be behind on their housing payments. This suggests that low income, and especially extremely low-income households and persons identifying as members of racial and ethnic minorities, are the most likely to have a disproportionate need for housing assistance due to the COVID-19 pandemic.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

The current resources are estimated to meet 10% of the need in Colorado. The HOME-ARP funds alone will not fill that gap, but will greatly assist in increasing Colorado's ability to meet the needs of more households without stable housing.

In addition, the vast majority of shelters in Colorado are congregate. This is an opportunity to acquire and keep Non-congregate Shelter units as a resource in the state. Colorado also does not have a consistent, stable, or adequate funding source for housing-focused services. As a result, the quality and amount of services able to be provided directly in coordination with housing resources varies greatly and limits the amount of Supportive Housing available.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

Based on the HIC and PIT analysis table above, at least 943 families housing units and 6505 adult household units are needed in addition to what already exists in Colorado to meet the need. These numbers are lower than the other estimates shared in this document, including the need for over 14,600 Supportive Housing units.

In order to create the necessary Supportive Housing units, funding to develop units and services funding are needed. Based on current funding needs supported by DOH to Supportive Housing projects, there is an average of \$40,000 per unit to develop and minimum of \$3,200 per year in services funding.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of "other populations" as established in the HOME-ARP Notice:

For services and TBRA, households and individuals at risk of homelessness will be eligible populations to be served. DOH has existing ESG and ERA partners and coordinated entry and assessment processes that will be utilized, and adjusted as necessary to align with HOME-ARP regulations and notices, as well as ensure the intended populations are served. During the

consultations, several domestic violence providers stated the need for a specific referral process to rental assistance for survivors so they may quickly exit the unsafe housing situation by having immediate access to rental assistance. This specific population's referral process will be further refined with the Continuum of Care's Coordinated Entry Systems and domestic violence partners collectively.

Identify priority needs for qualifying populations:

For any projects involving affordable or supportive housing or TBRA, the State will enable all qualifying populations to be served, with prioritization given based on need and best practices, while ensuring no violations occur regarding fair housing, civil rights and other discriminations. Demonstration of need will include behavioral health or medical needs, as well as populations that have been disproportionately impacted by COVID-19 or disproportionately overrepresented in homelessness and housing instability in general. This includes various demographics and populations as described earlier. For any non-congregate sheltering, DOH will give preference to projects that demonstrate an intent and ability to be low-barrier, housing-focused, and other best practices.

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

Gaps were determined based on various sources of information and analysis, including PIT and HIC reports, CSH's Supportive Housing estimates, Census Pulse Data, consultations and data from partners, and DOH's existing programs.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

DOH will utilize open, competitive solicitations for applications through existing Request for Applications (RFAs) and create additional application processes if necessary, all of which will be in alignment with HOME and OMB regulations, as well as State procurement rules and processes.

If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

N/A - No HOME-ARP administrative funds have been provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan. Should HUD approve the State's plan, DOH will provide 5% of the 15% of HOME-ARP funds that are being requested for administrative funding to subrecipients, prioritizing those that are non-profit organizations.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

| | Funding Amount | Percent of the Grant | Statutory Limit |
|--|-----------------|----------------------|-----------------|
| Supportive Services | \$ 10M | | |
| Acquisition and Development of Non-Congregate Shelters | \$ 4M | | |
| Tenant Based Rental Assistance (TBRA) | \$ 1M | | |
| Development of Affordable Rental Housing | \$ 4M | | |
| Non-Profit Operating | \$ 1M | 4 % | 5% |
| Non-Profit Capacity Building | \$ 1M | 4 % | 5% |
| Administration and Planning | \$ 3.7M | 15 % | 15% |
| Total HOME ARP Allocation | \$ 24.7M | | |

Additional narrative, if applicable:

The requested amounts are based on input from the consultation meetings, the public hearing, and other public input, as well as data regarding the need and analysis of amounts and activities that other funding sources are or will likely be dedicated to, such as ARPA funds for development of housing and sheltering.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

Supportive Services were overwhelmingly identified as a gap and need by stakeholders, and has been an identified gap in the state for several years. Services funding for the services noted previously is a key gap to creating and operating quality Supportive Housing in Colorado. Increasing the number of Supportive Housing units throughout the state is a goal of DOH in general. As noted previously, CSH estimates Colorado needs at least 14,600 Supportive Housing units. These funds will assist towards that goal.

It is also clear that if we do not have adequate pathways to help people stay safe while waiting for the creation of housing, more people will experience the consequences of homelessness, such as incarceration, decreased well-being, violence, and even death. Therefore, it is also a gap and priority to ensure additional safe shelter is created. The funds for Non-congregate Shelter will assist with that goal. Pre-pandemic, most of the shelters in Colorado were congregate and only open overnight or during the day, but often not 24/7. Many shelters have transitioned to 24/7 to reduce unnecessary movement and therefore COVID-19 transmission risks. While communities have created 400-800 Non-congregate Shelter units throughout the pandemic, many are

temporary, limited to outbreak response or FEMA funds. These funds will enable some of those shelters to be purchased and therefore remain as part of the shelter resources.

Finally, the pandemic's economic impact has highlighted that many households are cost burdened by high rents and low wages. Therefore the TBRA will help ensure families are able to maintain housing or quickly be rehoused.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

It is estimated that at least 800 housing opportunities will be awarded by 2025 and created by 2030, in line with the deadlines of the funds:

Based on State Fiscal Year 2020-21 gap funding awards for Supportive Housing projects by the State, it is estimated that at least 100 Supportive Housing units will be created and at least 100 Non-congregate Shelter units will be developed.

Based on rental assistance averages, it is estimated that at least 45 households will be served over two years with TBRA.

Based on tenancy support services gap funding provided by DOH, it is estimated that at least 555 households will be able to access Supportive Housing with the services funding from HOME-ARP.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

As noted above, at least 800 households will access housing opportunities. In particular, at least 100 units of Supportive Housing will be constructed and another 555 Supportive Housing units will be created with the addition of services. Increasing the number of Supportive Housing units throughout the state is a goal of DOH. As noted previously, CSH estimates Colorado needs at least 14,600 Supportive Housing units. These funds will assist towards that goal.

It is also clear that if we do not have adequate pathways to help people stay safe while waiting for the creation of housing, more people will experience the consequences of homelessness, such as incarceration, decreased well-being, violence, and even death. Therefore, it is also a gap and priority to ensure additional safe shelter is created. The funds for Non-congregate Shelter will assist with that goal.

Finally, the pandemic's economic impact has highlighted that many households are cost burdened by high rents and low wages. Therefore the TBRA will help ensure families are able to maintain housing or quickly be rehoused.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

For any projects involving affordable or supportive housing or TBRA, the State will enable all qualifying populations to be served, with prioritization given based on need and best practices, while ensuring no violations occur regarding fair housing, civil rights and other discriminations. Demonstration of need will include behavioral health or medical needs, as well as populations that have been disproportionately impacted by COVID-19 or disproportionately overrepresented in homelessness and housing instability in general. This includes various demographics and populations as described earlier. For any non-congregate sheltering, DOH will give preference to projects that demonstrate an intent and ability to be low-barrier, housing-focused, and other best practices.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the *PJ's needs assessment and gap analysis*:

DOH will review and approve applications based upon the applicant's ability to demonstrate experience with and ability to implement best practices, such as low-barrier, housing first. Applicants will need to provide a tenant selection plan, referral process, or eligibility criteria to DOH before approval. DOH has existing processes and experience with reviewing applications for these factors.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

N/A

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe

the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity
N/A
- Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.
N/A
- State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
N/A
- Specify the required compliance period, whether it is the minimum 15 years or longer.
N/A
- State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
N/A
- ***Other requirements in the PJ's guidelines, if applicable:***
N/A

Public Comment Documentation



STATE OF COLORADO

Everson - DOLA, Connor <connor.everson@state.co.us>

Division of Housing Updates - December 3, 2021

Alison George - Department of Local Affairs <alison.george@state.co.us>
Reply-To: Alison George - Department of Local Affairs <alison.george@state.co.us>
To: connor.everson@state.co.us

Fri, Dec 3, 2021 at 1:16 PM

[View this email in your browser](#)



DOH Updates

DEC 2021

**Enhanced DOH GAP (EDG) funding NOFA
for CHFA 9% LIHTC 2022 Round**



The Colorado Department of Local Affairs (DOLA), through its Division of Housing (DOH), Office of Housing Finance and Sustainability (OHFS), is requesting applications for Enhanced DOH Gap funding (EDG) available to CHFA's 2022 Round One 9% federal housing tax credit applicants. This EDG NOFA is intended to leverage 9% housing tax credits across competitive projects in Round One. EDG applications will be evaluated by DOH to

align with CHFA's evaluation process and timing for Round One. Applicants who choose to participate in this process will have the EDG funding request underwritten by DOH concurrently with the CHFA LIHTC application which will eliminate the need for an additional DOH application in the future. Applicants who do not apply for EDG concurrent underwriting and funding are eligible to apply to DOH for standard gap financing at a later date.

The EDG NOFA can be found on the DOH website [here](#).

Amended OTK NOFA



DOH released the Operation TurnKey NOFA in September 2021 offering loans for the acquisition of land and buildings for the future use as housing. Unfortunately, many intended borrowers were not eligible for the loan program due to TABOR limitations prohibiting them from taking on debt. Local governments are a critical partner in addressing the state's affordable housing needs. DOH amended its Operation TurnKey Acquisition NOFA [here](#). The revision applies to local government entities who are subject to TABOR restrictions.

"Local government entities subject to TABOR restrictions may be eligible for grant funds under this NOFA. Such local government entities must provide at least a 20% match to be eligible for grant funds. Additional grant assurances will also apply."

HOME-ARP: HOME Program American Rescue Plan Act Public Hearing



para español haga clic aqui

DOH is excited to welcome any member of the public to join for a virtual public hearing regarding the draft action plan for **HOME Program - American Rescue Plan Act** (HOME ARP) funds to DOH. The hearing will be held virtually on Friday, December 17, from 2:00-3:00 p.m. MST. An interpreter may be provided upon request; please email connor.everson@state.co.us to request an interpreter.

The public may also view and comment on a draft of the HOME-ARP action plan containing the amount of HOME-ARP the State will receive along with the range of activities the State may undertake with those funds. This draft will be posted on the **Publications & Reporting** page of the DOH website by December 10, 2021. Comments will be accepted through December 26, 2021, and may be submitted to connor.everson@state.co.us.



Colorado HOME-ARP Action Plan Public Hearing

The virtual public hearing may be accessed in the following ways:

Friday, December 17 • 2:00 p.m. MST

Zoom Meeting Link

By Phone: 1-253-215-8782

**Find your local number: <https://us02web.zoom.us/j/90111111111>

Project Highlight

River Ridge - Salida, CO



DOH is excited to share that River Ridge is nearing completion. Chaffee Housing Trust (CHT) was awarded a grant of \$127,000 in September 2020 through DOH's Office of Housing Finance and Sustainability. CHT placed an order for eight (8) housing units in November 2020 with indieDwell Colorado, a Pueblo based housing manufacturer.

The housing units were delivered to the site in August 2021 and are expected to be ready for occupancy in January 2022. River Ridge will provide eight for sale condominiums to new homeowners that are at or below 80% AMI in Salida.



| Sources for Financing | Amount |
|---------------------------------------|-------------|
| Grant Funds (DOLA) | \$127,000 |
| Colorado Health Foundation | \$148,000 |
| City of Salida Fee Waivers | \$45,502 |
| Construction Loan - High Country Bank | \$1,600,000 |

DOH is Hiring!



Loan Portfolio Officer

(Posting closes 12/12/2021)

This position is within DOH's Office of Housing Finance and Sustainability and will be responsible for providing guidance to program staff concerning all financial issues related to grant and loan management, including: tracking all loans in the division of housing portfolio, reviewing the property and financial audits, responding to annual loan requests, and providing an annual report on the loan status. This position will oversee the division's loan portfolio which exceeds the value of \$140,000,000. The position will assess current internal practices and work with budget and accounting to streamline processes and develop new policies and procedures if applicable. In addition, this position will also oversee contract and payment records for the division's loan portfolio.

Employment Opportunities with the Department of Local Affairs



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This email was sent to connor.everson@state.co.us
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Division of Housing · 1313 Sherman St Rm 500 · Denver, CO 80203 · USA



State of Colorado HOME-ARP Allocation Plan for Public Comment

Published on: 12/10/2021

Introduction

[The American Rescue Plan \(ARP\)](#) provides \$5 billion to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability across the country. These grant funds will be administered through HUD’s HOME Investment Partnerships Program (HOME).

The 651 State and local Participating Jurisdictions (PJs) that qualified for an annual HOME Program allocation for FY 2021 are eligible to receive HOME-ARP grants, and the State of Colorado has been allocated \$24,729,198 in HOME-ARP funds, or 36% of all HOME-ARP funds in Colorado. The cities of Aurora, Boulder, Colorado Springs, Denver, Fort Collins, Greeley, and Pueblo along with the counties of Adams, Arapahoe, and Jefferson will receive their own allocations, and will be planned for using their own processes.

HOME-ARP funds can be used for four eligible activities:

- Affordable Rental Housing (Acquire, Construct, or Rehabilitate for Occupancy by Qualified Population)
- Tenant-Based Rental Assistance (TBRA)
- Supportive Services [[24 CFR 578.53\(e\)](#)], Homeless Prevention Services, & Housing Counseling
- Non-Congregate Shelter (Acquire, Construct, or Rehabilitate for Temporary Shelter)
- Non-Profit/CHDO Operating & Capacity Building Assistance

HOME-ARP performance period is from the time of grant agreement execution until September 30, 2030. DOH and HUD executed their HOME-ARP agreement on September 20, 2021.

Proposed Range of Activities

| State of Colorado Proposed HOME-ARP Budget by Activity | | | |
|--|----------------|----------------------|-----------------|
| | Funding Amount | Percent of the Grant | Statutory Limit |
| Supportive Services | \$ 10M | 40.5% | |
| Acquisition and Development of Non-Congregate Shelters | \$ 4M | 16.2% | |
| Tenant Based Rental Assistance (TBRA) | \$ 1M | 4% | |
| Development of Affordable Rental Housing | \$ 4M | 16.2% | |





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 Division of Housing

| | | | |
|----------------------------------|-----------------|------|-----|
| Non-Profit Operating | \$ 1M | 4 % | 5% |
| Non-Profit Capacity Building | \$ 1M | 4 % | 5% |
| Administration and Planning | \$ 3.7M | 15 % | 15% |
| Total HOME ARP Allocation | \$ 24.7M | | |

Narrative

These recommended budget allocations are based on a combination of reviewing homelessness and housing needs data in general and due to COVID-19, as well as stakeholder input and engagement in general, and specifically regarding American Rescue Plan Act HOME Program (HOME-ARP) consultations with various stakeholders, including representatives from Continuum of Care (CoC) regions; Public Housing Authorities (PHAs); Domestic Violence Providers; Veteran, Youth, Family and Homeless Services and Supportive Housing Developers, Operators, and Providers; other State Agency and Local Government Staff; and other stakeholders. A recording of a consultation webinar conducted on December 2, 2021 may be found [here](#), and the slides presented during that consultation may be found [here](#).

In addition the State Legislature created interim committees to review the needs across the housing, behavioral health, economic recovery, and workforce spectrums, particularly the impacts of COVID-19 and how that will inform ARPA funds decisions. DOH staff have been part of the Affordable Housing Transformational Task Force and in dialogue with the other interim committees. All interim committees have received input from elected officials, state staff, community experts, and various members of the public. Finally, DOH has also gathered input from the pipeline, progress, and feedback of several existing efforts that align with HOME-ARP that help inform where there are gaps in resources and how HOME-ARP funds might assist in creating housing and shelter opportunities for HOME-ARP qualifying populations.

As the budget indicates, supportive services was overwhelmingly noted as a significant gap and need.





Overview of the American Rescue Plan Act HOME Program





HOME ARP



Through HUD's HOME Investment Partnerships Program (HOME), the American Rescue Plan (ARP) Act provides \$5 billion nationwide to assist individuals or households who are homeless, at risk of homelessness, fleeing domestic violence, veterans, and other vulnerable populations.

Aim:

Reduce homelessness & increase housing stability.

Eligible Activities:

- Affordable Rental Housing (Acquire, Construct, or Rehabilitate for Occupancy by Qualified Population)
- Tenant-Based Rental Assistance (TBRA)
- Supportive Services [[24 CFR 578.53\(e\)](#)], Homeless Prevention Services, & Housing Counseling
- Non-Congregate Shelter (Acquire, Construct, or Rehabilitate for Temporary Shelter)
- Non-Profit/CHDO Operating & Capacity Building Assistance

Performance Period:

9/20/2021-9/30/2030



HOME ARP



Eligible Populations:

HOME-ARP funds must be used to primarily benefit individuals or families from the following qualifying populations:

1. Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#));
2. At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11360\(1\)](#));
3. Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
4. In other populations where providing supportive services or assistance under section 212(a) of the Act ([42 U.S.C. 12742\(a\)](#)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability;
5. Veterans and families that include a veteran family member that meet one of the preceding criteria.

HOME ARP Allocations in Colorado

Colorado Allocations: \$67.4M total to CO, including \$24.7M to DOH

| | | |
|------------------------|----|--------------|
| Aurora | CO | \$4,149,712 |
| Colorado Springs | CO | \$5,741,978 |
| Denver | CO | \$10,820,331 |
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| CO Non Entitlement | CO | \$24,729,198 |
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Department of Local Affairs



HOME ARP



Notice Details and Implementation Fact Sheets:

<https://www.hudexchange.info/resource/6480/home-arp-implementation-notice-fact-sheets/>

Income Levels Restrictions:

HOME ARP funds are intended to primarily benefit households based on their status as "qualifying populations."

Unlike the regular HOME Program, which targets HOME-assisted rental units based on tenant income, 70 percent of all HOME ARP units will serve households based **only** upon their status as qualifying households.

Up to 30 percent of HOME ARP assisted units may be restricted to households that are low-income as defined in 24 CFR 92.2 ("low-income households").

Rent Limit:

HOME ARP uses the same rent limits as the HOME Program.

Timeline & Process

- (1) September 2021: HUD & DOH Grant Agreement Executed
- (2) November & December 2021: DOH Stakeholder & Public Consultations
- (3) January 2021: Submit DOH HUD Action Plan HOME ARP Amendment
- (4) January 2021 (*estimate*): HUD Review & Approval of Amendment
- (5) January 2021 onward (*estimate*): Release necessary application processes for HOME ARP funds.
- (6) September 2025: Deadline to Encumber All Funds
- (7) September 2030: Deadline to Expend All Funds



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Colorado's Need



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The Need

Doubling of first time homeless experience in Denver shelters in the past year.

9,846

People in shelters, transitional housing, or unsheltered one night in Jan. (2020 HUD Point in Time Count)

14,600+

Individuals estimated to need housing units with services in CO. (2019 CSH)

23,000+

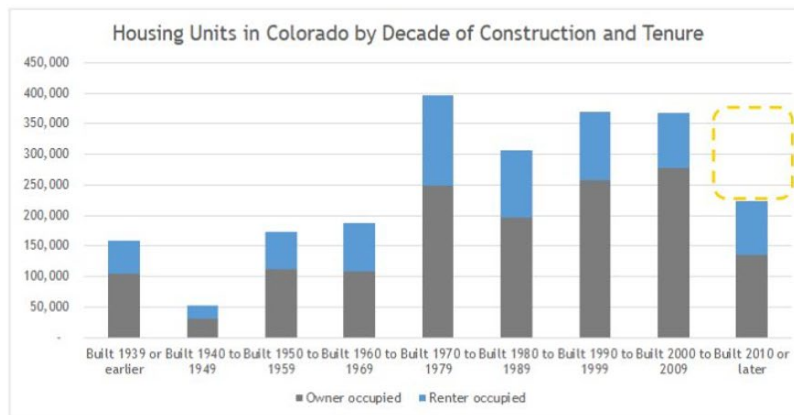
Students experiencing homelessness, doubled-up, or unstably housed. (2018-19 school year, McKinney-Vento liaisons)

53,000+

Individuals without stable housing covered by CO Medicaid. (2019 HCPF Medicaid data)



Deficit of Construction of Housing



40% drop in housing production last decade

Source: ACS 1-year estimates, 2019



State of Colorado's Strategy



COLORADO
Department of Local Affairs



COLORADO
Department of Local Affairs
Division of Housing

MAKING HOMELESSNESS HISTORY IN COLORADO

THE VISION

Our vision is that everyone in Colorado has a safe, stable, and affordable place to live. We can create a future where homelessness is rare and brief when it occurs, and no one gets left behind.

Guiding Mission

The State of Colorado is focused on supporting communities in creating a robust continuum of proven solutions designed to connect people without stable housing to supportive services, behavioral health and medical care, and housing.

The state invests in best practices now, but not at the scale needed. We have the unique opportunity to bring those best practices and proven solutions to scale.



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Department of Local Affairs



DOH Homeless Response Priorities ARPA & Other Stimulus Funds



- 1. Permanent Housing**
Increase housing + services pairings to meet scale needed.
- 2. Shelter & Bridge Housing**
Create new non-congregate shelters and new bridge housing.
Transform existing shelters and transitional housing to best practices.
- 3. Systems Work**
Create lasting structure for efficient coordination of resources.
- 4. Know Who is Homeless**
Increase outreach & engagement.
Improve data across homeless programs and between systems.
- 5. Homelessness Prevention**
Ensure prevention funds are fully utilized equitably.

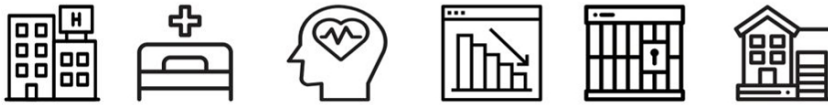
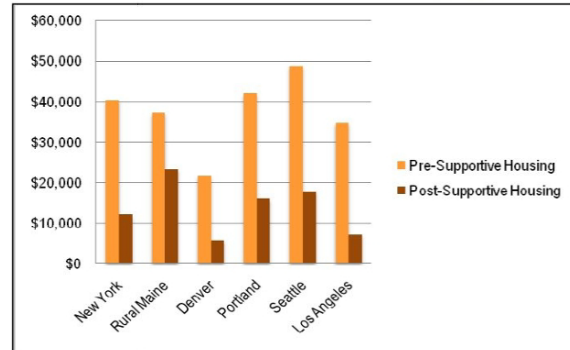


Supportive Housing Priority



When quality housing-focused services and housing are provided together:

- 85% Stay Housed in DOH programs.
- Denver SIB showed significant housing stability and cost savings.
- Cost Savings Repeatedly Realized:



| | | | | | |
|--|--|---|---|--|--|
| ER Visits <i>decreased</i> 24% - 34% | Hospital Days <i>decreased</i> 27% - 29% | Psych Admissions <i>decreased</i> 82% - 87% | Medicaid Costs <i>decreased</i> 41% - 67% | Incarceration <i>decreased</i> 42% - 45% | Housing Stability <i>increased</i> 79% - 93% |
|--|--|---|---|--|--|

Source: CSH

Stakeholder and Public Consultation/Input

Informational Session 2022 PSH RFA: Nov 18, 2021 @ 3:30 p.m.
[Written HOME ARP Comments](#) & [Webinar Recording](#)



Questions for Discussion

- What gaps exist in the shelter, housing, and services system for the qualifying populations?
- What are your community's priorities for new resources?
- Are there groups within the qualifying populations that have particular needs that should be considered?
- What qualitative information is available about gaps in housing, services and accessibility for groups who are overrepresented in homelessness?
- What unmet need(s) exist that current funding cannot address?



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Thank you!



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Kristin Toombs
Director
Office of Homeless Initiatives
kristin.toombs@state.co.us

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Department of Local Affairs





State of Colorado HOME ARP
Virtual Public Hearing

December 17, 2021
2pm-3pm MT

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Overview of the American Rescue Plan Act HOME Program



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Department of Local Affairs



HOME ARP



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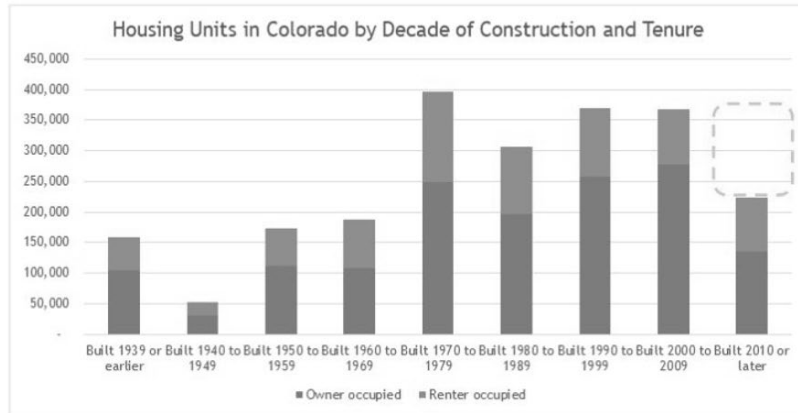
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2. **Shelter & Bridge Housing**
Create new non-congregate shelters and new bridge housing.
Transform existing shelters and transitional housing to best practices.
3. **Systems Work**
Create lasting structure for efficient coordination of resources.
4. **Know Who is Homeless**
Increase outreach & engagement.
Improve data across homeless programs and between systems.
5. **Homelessness Prevention**
Ensure prevention funds are fully utilized equitably.

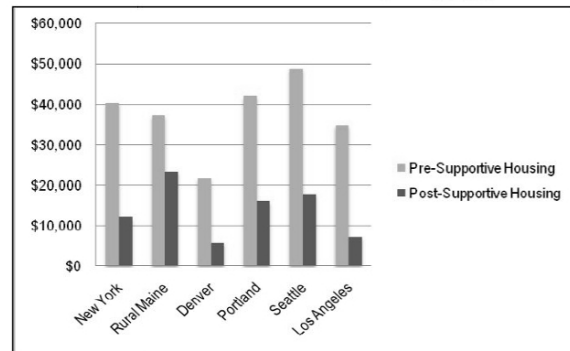


Supportive Housing Priority



When quality housing-focused services and housing are provided together:

- 85% Stay Housed in DOH programs.
- Denver SIB showed significant housing stability and cost savings.
- Cost Savings Repeatedly Realized:



| | | | | | |
|--|--|---|---|--|--|
| ER Visits <i>decreased</i> 24% - 34% | Hospital Days <i>decreased</i> 27% - 29% | Psych Admissions <i>decreased</i> 82% - 87% | Medicaid Costs <i>decreased</i> 41% - 67% | Incarceration <i>decreased</i> 42% - 45% | Housing Stability <i>increased</i> 79% - 93% |
|--|--|---|---|--|--|

Source: CSH

Proposed Budget

| State of Colorado Proposed HOME-ARP Budget by Activity | | | |
|--|-----------------|----------------------|-----------------|
| | Funding Amount | Percent of the Grant | Statutory Limit |
| Supportive Services | \$ 10M | 40.5% | |
| Acquisition and Development of Non-Congregate Shelters | \$ 4M | 16.2% | |
| Tenant Based Rental Assistance (TBRA) | \$ 1M | 4% | |
| Development of Affordable Rental Housing | \$ 4M | 16.2% | |
| Non-Profit Operating | \$ 1M | 4 % | 5% |
| Non-Profit Capacity Building | \$ 1M | 4 % | 5% |
| Administration and Planning | \$ 3.7M | 15 % | 15% |
| Total HOME ARP Allocation | \$ 24.7M | | |



What Comments do you have?





HOME-ARP: Audiencia pública de la Ley del Plan de Rescate Estadounidense del Programa HOME

La División de Vivienda (DOH) se complace en dar la bienvenida a cualquier miembro del público para que se una a una audiencia pública virtual sobre el borrador del plan de acción del Programa HOME - Ley del Plan de Rescate Estadounidense (HOME ARP) fondos al DOH. La audiencia se llevará a cabo virtualmente el viernes 17 de Diciembre de 2:00-3:00PM MT. Se puede proporcionar un intérprete si es solicitado, envíe un correo electrónico a connor.everson@state.co.us para solicitar un intérprete.

El público también puede ver y comentar un borrador del plan de acción HOME-ARP que contiene la cantidad de HOME-ARP que el estado recibirá junto con la gama de actividades que el estado puede realizar con esos fondos. Este borrador se publicará en la [Publicaciones e informes del sitio](#) página web de la División de Vivienda a más tardar el 10 de Diciembre de 2021; los comentarios se aceptarán hasta el 26 de Diciembre de 2021 y se pueden enviar a connor.everson@state.co.us.

Se puede acceder a la audiencia pública virtual de las siguientes maneras:

Tema: Audiencia pública del plan de acción HOME-ARP de Colorado

Hora: 17 de Diciembre de 2021 02:00 PM MST (EE. UU. Y Canadá)

Únase a la reunión de Zoom

<https://us02web.zoom.us/j/81391654494?pwd=UTR6YUtsVFRiUmVub1J3MGtxNEF2Zz09>

ID de reunión: 813 9165 4494

Código de acceso: 754923

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+ 12532158782, 81391654494 # ,,, * 754923 # EE. UU. (Tacoma),

+ 13462483977 # EE. UU. (Houston)

Marque según su ubicación

+1253215 8782 EE. UU. (Tacoma)

+1346248 7799 EE. UU. (Houston)

+1669900 6833 EE. UU. (San José)

+1301715 8592 EE. UU. (Washington DC)

+1 312 626 6799 EE. UU. (Chicago)

+19292056099 EE. UU. (Nueva York)

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