



# ANNUAL ACTION PLAN

2018-19



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*Strengthening Colorado Communities*



# 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 along with subsequent Annual Action Plans. The Consolidated Plan covers the period from April 1, 2015 through March 31, 2020. This Annual Action Plan covers the fourth program year (2018-2019) of the 2015-2020 Consolidated Plan. By submitting this Plan, the State is applying for formula grants from five programs: the Community Development Block Program (CDBG), the HOME Investment Partnership program (HOME), the Emergency Solutions Grant program (ESG), Housing Trust Fund (HTF), and the Housing Opportunities for Persons with AIDS program (HOPWA). The Housing Trust Fund (HTF) is a new affordable housing production program that will complement 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 homeless families.

The State's Department of Local Affairs (DOLA) is the lead agency in administering these funds, and will use them to further its mission of strengthening Colorado communities in ways that are consistent with the intent of the programs and that comply 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, ESG, HTF, and HOPWA programs. The State of Colorado has also received and is overseeing the use of CDBG Disaster Recovery funds (CDBG-DR) to assist with the recovery of communities that were damaged or destroyed by the floods and wildfires 2013.

For Fiscal Year 2018-2019, the State of Colorado expects to receive approximately \$22.8 million in funding from the HUD across all programs. This will be used for various purposes including the financing of the construction, rehabilitation, and preservation of affordable housing in addition to community and economic development (for CDBG funds). Funds are granted and loaned to awardees in compliance with federal program guidelines and regulations as well as the State of Colorado's policies. The pages that follow detail public participation in this planning process, resources that the State expects to receive and their planned uses, annual goals, methods of funding distribution, and other statements on programmatic operations that HUD requires in the Annual Action plan.

### 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.

Several of our plan goals address the objective of providing decent affordable housing: increasing the supply of affordable housing, preserving the supply of affordable housing, and improving the capacity of non-profit housing organizations. All three of these work to improve availability and accessibility of decent affordable housing through construction, and acquisition or renovation of physical housing units. An overall increase in the supply of affordable housing benefits all residents of the state including people experiencing homelessness and people with special needs.

One plan goal, improving the affordability of housing, includes activities such as down payment assistance and rental assistance, in which the residents of the housing receive a subsidy to make existing housing affordable to them.

Six goals lead to improved sustainability of communities through the creation of suitable living environments – disaster recovery/urgent need, demolition, improving public infrastructure, community development and capital improvement, improving local government capacity, and homelessness prevention and alleviation. All of these enable communities to remain vibrant and livable.

An eighth goal, small business development, addresses the sustainability of communities through economic development, the lifeblood of any healthy community.

### **3. Evaluation of past performance**

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

For the 2017-2018 program year, we were successful in meeting most of our proposed goals, while continuing to focus on ways in which we can improve. Previous Action Plans, Consolidated Plans, and Consolidated Annual Performance Evaluations have shown our performance successes in greater detail. Utilizing data from past performances, we are able to more accurately choose our goals and projects based on funding allocation amounts as well as needs and priorities. Furthermore, every year we analyze the history for each project type, applications received, number of units produced, and the cost of each unit type. Finally, we consider the most recent available data on housing inventory and markets, the survey results, and the best use of funding to provide the greatest long-term benefit to those most in need.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

We have updated our Citizen Participation Plan in order to achieve more effective outreach and response opportunities and include new Affirmatively Furthering Fair Housing (AFFH) requirements as revised at 24 CFR 91.115. In addition, we increased our contact list for distribution of flyers announcing the availability of the draft Annual Action Plan online and holding of the public hearing.

Our improved contact list allowed for us to receive more than ten times the number of responses we have had in the past. This substantial increase provided us with more information from various types of agencies and produced a more effective consultation component to our plan. In addition, the revised Citizen Participation Plan used the increased contact list to reach more citizens around the State requesting participation in reviewing our draft Annual Action Plan.

**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.

The State of Colorado received input from various stakeholders in the private, public, and non-profit sectors regarding this plan and housing needs in their communities. Input regarding content and formatting has been accepted and integrated. Statements on the importance of the new construction, rehabilitation, and preservation of housing for both ownership and rent were received and are reflected in this plans goals and methods, as permitted by federal regulations and market conditions. More detailed information on the public comment process, comments received, and responses are covered in sections AP-10 and AP-12.

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

N/A

**7. Summary**



**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		

**Table 1 – Responsible Agencies**

**Narrative**

The Department of Local Affairs (DOLA) is the lead agency for the application. Two Divisions of DOLA administer the HUD formula programs, coordinate administration and provide reporting for these HUD funds under the authority of the Executive Director. The lead agency for the CDBG program is the Division of Local Government (DLG), while the Division of Housing (DOH) is the lead agency for the HOME, ESG, HTF, and HOPWA programs.

**Consolidated Plan Public Contact Information**

Main Number: 303-864-7810 TDD/TTY Number: 303-864-7758 Media Inquiries: 303-864-7707 Advocate Line: 303-864-7709 (LOCAL); 800-536-5349 (TOLL-FREE)

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

### **1. Introduction**

DOLA took advantage of three ongoing consultation processes to develop major elements of the Consolidated Plan. The first and largest consultation process involved development of the Disaster Recovery Action Plan for use of CDBG-DR funds . Another consultation process that occurred was done in conjunction with development of the PHA Agency Plan and involved 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 all three Continua of Care in Colorado to coordinate the use of Emergency Solutions Grant and Continuum of Care funds. Additionally, for the consultation of this year's Annual Action Plan, we expanded our contacts list and were able to obtain substantially more responses than previous years.

### **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**

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

- Established OHI to focus on homeless issues.
- OHI administers the “State Housing Voucher Program,” partnering with the Colorado Department of Human Services and statewide community mental health centers to administer 125 state-funded housing vouchers annually with supportive services for participants with mental health disorders experiencing homelessness.
- Established a “Housing Initiatives” program to coordinate and collaborate with multiple agencies across additional program areas, including Veterans’ Housing, Renewable Energy, and other areas of interest.
- DOH participates in the Mental Health Disorders in the Criminal Justice System Taskforce; an interagency group including the Colorado Department of Corrections and community mental health centers working to address the needs of adult ex-offenders with co-occurring mental health and substance abuse disorders.
- Intradepartmental CDBG Coordinating Group. DOLA created a cross-divisional work group to coordinate and integrate its use of CDBG funds.
- The Housing “Pipeline” which includes 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).
- Pathways Home Colorado Advisory Board is a State coordinating organization appointed by the Governor to direct the implementation of the state plan to end homelessness.

- Participation in Colorado’s three Continua of Care: Metropolitan Denver Homeless Initiative, Homeward Pikes Peak and the The Colorado Balance of State.
- 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.
- As part of OHI, the Office of Homeless Youth Services, a program within the Division of Housing, will meet on a regular basis with statewide agencies to establish goals, objectives and to seek funding.

**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**

In all three CoCs across Colorado, OHI plays an active role to coordinate the CoC stakeholders across the state and to assist in strategies towards addressing the needs of homeless persons throughout each CoC. Specifically, the OHI staff members hold seats on CoC boards or committees, and provide technical assistance as needed to ensure full understanding of local, state and federal policies and best practices. OHI acts as a leader in centralizing statewide goals, data and progress.

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

**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**

In response to the changes made to HUD’s Homeless Assistance Programs by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, and the ESG Interim Rule that followed, Colorado has greatly increased collaboration with its three Continua of Care (CoCs) in designing its ESG program and HMIS. In 2012, representatives of the CoCs met with DOH staff to draft an allocation plan and host initial discussions for performance standards, evaluating outcomes, projects, policies and procedures for activities assisted by ESG funds, and developing funding, policies and procedures for the administration and operation of HMIS. Since 2012, DOH’s allocation of ESG funds for Homeless Prevention and Rapid Rehousing (HP/RR) activities are now allocated to each CoC for recommendations and selection of applicants within their continuum. This new process for allocating ESG funds has

increased regional collaboration and has led CoCs in Colorado to begin work towards a coordinated intake and assessment process to allocate their HP/RR funding to those in their communities with the highest level of need. Currently, the Denver Metro area CoC has the most advanced coordinated assessment system and anticipates incorporating HP/RR resources into the system in the coming year.

Coordination to assist people experiencing homelessness and prevent homelessness will be led by Colorado's CoCs. Active engagement and membership in the CoC is required to receive funding. The CoCs will further engage and coordinate resources to improve current programs and funding strategies; and provide ongoing training as procedures are refined.

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	COLORADO HOUSING AND FINANCE AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Partner agency.
2	<b>Agency/Group/Organization</b>	Metro West Housing Solutions
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Survey respondent.
3	<b>Agency/Group/Organization</b>	Violence Free Colorado
	<b>Agency/Group/Organization Type</b>	Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Domestic violence
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Survey respondent.
4	<b>Agency/Group/Organization</b>	Colorado Cross Disability Coalition
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Accessibility

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Survey respondent.
5	<b>Agency/Group/Organization</b>	East West Econometrics
	<b>Agency/Group/Organization Type</b>	Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Survey respondent.
6	<b>Agency/Group/Organization</b>	Rocky Mountain Land Trust
	<b>Agency/Group/Organization Type</b>	Services - Housing Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Survey respondent.

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

All agency types were consulted as a part of the Annual Action Plan submission process via surveys and email outreach.

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Colorado Coalition for the Homeless	One of our highest priority goals is eliminating homelessness through coordination with our continua of care.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Colorado Division of Housing 1- and 5 Yr Plan	Colorado Division of Housing PHA CO911	The goals in the PHA plan primarily address housing Colorado's most vulnerable citizens, which very closely mirror the goals in our Strategic Plan.
Colorado Disaster Recovery Action Plan	Colorado Dept of Local Affairs/Colorado Recovery Office	The disaster recovery plan overlaps the Con Plan in the areas of housing stock, economic development, and public facilities, all of which were depleted by the floods of Sept 2013 and by major wildfires.
Colorado Housing and Finance Authority	LIHTC Qualified Allocation Plan	The QAP overlaps with the Con Plan in the area of affordable housing.

**Table 3 - Other local / regional / federal planning efforts**

**Narrative**

## **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**

DOLA revised the Citizen Participation Plan to include better outreach practices and encourage greater citizen participation. Notice of the draft being available for comment for 30 days and notice of the public hearing were sent via email to our extended contact list from the survey section of the plan. Additionally, the notice and draft were posted on our website. Contact information was provided via a flyer encouraging citizen participation comments by phone, email, or in person. Our goal for outreach is to provide information to as many organizations and individuals in the most effective ways in order to target all necessary populations.



**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)
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1	Public Meeting	Non-targeted/broad community	The public meeting took place on June 19th and was attended by 8 members of the public who represented the non-profit and government sectors.	A few comments were made regarding formatting. Attendees suggested that we remove language left in this plan regarding transitional housing as a policy priority, and it has been removed. Another suggestion was made on adding a plain language executive summary on the purpose and content of this plan, which has been added. Participants were also curious about how the Department distributes its funds geographically throughout the State. This is not required in the	N/A	
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				<p>Action Plan, but the Department is currently revamping its website, reporting, and data visualization processes which will include new content on the history of funding awards, which will include geographic distribution. It was suggested that the Department should institute a uniform and universal requirement for coordinated entry as a condition of funding awards. We acknowledge coordinated entry as a best practice, however, the Department feels it is important to be flexible regarding the type and</p>		
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				<p>complexity of applicants tenant selection processes for Permanent Supportive Housing, given the diverse needs and administrative capacity throughout the State. An advocate suggested that a greater emphasis be placed on eviction prevention through the provision of legal services as opposed to later housing intervention options such as rapid rehousing. The Department will review best practices in this area to determine how to integrate it while following regulatory and</p>		
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				<p>statutory guidelines. Similarly, it was suggested that an increased focus be placed on affordable housing preservation of home ownership and rental units which are becoming increasingly scarce because of market forces. The Department will continue to use funding sources, as allowable under regulations, to preserve and rehabilitate affordable housing by collaborating with peer agencies. The issue of lease renewal fees was raised, which a participant said can place exorbitant financial</p>	
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				<p>burdens on tenants. The Department will review current State statutes regarding lease renewal fees, and work with community partners to determine the prevalence of this practice while reviewing potential policies to address this if necessary. Some questions were directed at programs funded by the State of Colorado -- notably the Fort Lyon Supportive Residential Community. Participants asked on the status of the Fort Lyon program evaluation, and suggested that the efficacy of the program be</p>		
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				<p>considered in how these funds are allocated in future years. A program evaluation is currently being conducted by a third party firm chosen by the State Auditor's Office. This report will be completed by Fall 2018 and the results will be presented to the Colorado General Assembly, which will decide on future appropriations for Fort Lyon. An eviction advocate stated that they have noticed an increase in the volume of complaints from citizens that hold housing vouchers (HCV, VASH) being</p>		
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				<p>evicted from privately held units, and wondered how the Department could use its rental assistance programs to help these families. These programs are administered by other offices within the Division of Housing which do not participate in the Action Plan process as they are funded by the U.S. Department of Housing and Urban Development's Office of Public Housing and thus are covered under the Public Housing Agency Plan. The Action Plan only covers programs funded by HUD's Office of</p>		
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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)
				Community Planning and Development, but the Division will investigate the prevalence of voucher holder evictions in its programs nonetheless.		

2	Internet Outreach	Non-targeted/broad community	Internet outreach was used to inform the public about the public meeting and to gather survey responses.	An email was sent out to the Division of Housing email list which includes private, public, and non-profit stakeholders throughout the State. The survey utilized a ranked choice system where respondents chose which housing issues were most problematic in their communities. There were six responses across various topical areas which ranked as follows: Which economic, housing, and infrastructure needs are most important?1 Increase Supply of Affordable Housing2 Improve		
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				Housing Affordability <sup>3</sup> Homeless Prevention and Alleviation <sup>4</sup> Preserve Existing Affordable Housing <sup>5</sup> Improve Public Infrastructure <sup>6</sup> Community Development and Capital Improvement What rental housing need is most important?: <sup>1</sup> Acquisition of existing units, Rehabilitation of existing units, Rental assistance <sup>2</sup> New Construction <sup>3</sup> Rental housing for small families (2 to 4 persons) What home ownership need is most important?: <sup>1</sup>		
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				<p>Accessible housing for people with disabilities<sup>2</sup> Down payment/closing cost assistance<sup>3</sup> Rehabilitation<sup>4</sup> Pre-purchase housing counseling<sup>5</sup> Energy efficiency improvements</p> <p>These survey results reflect the current priorities of the Department to increase the supply of affordable housing through granting and loaning funds for the rehabilitation and construction of affordable housing. Homeless prevention and alleviation is addressed through the ESG program, and additional federal and state</p>		
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				<p>funding sources which are prioritized towards permanent supportive housing and rapid rehousing. Finally the Department awards HOME funds for down payment assistance and rehabilitation projects throughout the State, including a down payment assistance program exclusively serving persons with disabilities. Respondents also had the option to leave written responses. They wrote that a sustainable continuum of housing from homelessness to home ownership is</p>		
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				<p>required, where the only static phase is home ownership. Another comment was made regarding the difficulty of maintaining housing on a fixed income -- especially for those with disabilities. They wrote that many individuals cannot afford housing, even with a voucher, and that they go in and out of assisted housing because of benefit cliff effects as increased incomes result in increased rents. Though these comments are more applicable to the Continuum of Care and Public Housing programs, which are not addressed in</p>		
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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)
				<p>the Action Plan (Community Planning and Development), the Division will continue to participate in each of the State's Continua of Care and our Voucher team will continue to administer the Family Self Sufficiency Program which reduces the impact of benefit cliffs while improving the financial security of families receiving housing assistance.</p>		



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)
3	Flyer distributed to general public	Minorities  Non-English Speaking - Specify other language: Spanish  Persons with disabilities	Flyer was used to inform the public of the public meeting. It includes a section in Spanish, provided the TTY number, and explains that interpreters would be provided upon request.			

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

DOLA receives a variety of Federal and State resources, including the HUD formula amounts shown below that help meet the State’s housing, community and economic development needs. DOLA links these resources together and combines them with funding from local jurisdictions and private sources to maximize cost efficiency and stretch the public dollar.

#### 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	10,055,294	1,324,232	964,577	12,344,103	22,399,397	Colorado Non-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	6,671,702	1,877,185	0	8,548,887	15,220,589	HOME Investment Partnership Non-Entitlement 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: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	567,866	0	0	567,866	1,135,732	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	1,965,723	0	0	1,965,723	3,931,446	Emergency Solutions Grants balance of 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	3,563,587	0	0	3,563,587	7,127,174	Housing Trust Fund allocation for the State of Colorado.
Continuum of Care	public - federal	Short term or transitional housing facilities Supportive services Transitional housing Other	7,133,667	0	0	7,133,667	14,263,334	This is the amount awarded to DOH from the Competitive grant process.

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	Housing	8,200,000	0	0	8,200,000	16,400,000	Created by the Colorado state treasury, the Housing Development Grant Fund (HDG) is administered by the Division of Housing (DOH). This fund consists of monies appropriated to the Colorado Affordable Housing Construction Grants Fund by the General Assembly. HDG provides funds for acquisition, rehabilitation, and new construction through a competitive application process to improve, preserve or expand the supply of affordable housing; to finance foreclosure prevention activities in Colorado, and to fund the acquisition of housing and economic data necessary to advise the State Housing Board on local housing conditions.

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: \$		
Housing Trust Fund	public - federal	Multifamily rental new construction Multifamily rental rehab	0	0	0	0	0	
Section 811	public - federal	Rental Assistance Supportive services	1,045,690	0	0	1,045,690	5,956,171	Section 811: HUD funding for permanent affordable housing with supportive services for people with disabilities who have income less than 30% of the area median, to enable them to live independently rather than in institutional settings.
Supportive Housing Program	public - federal	Rental Assistance Supportive services	4,989,637	0	0	4,989,637	10,000,000	Fort Lyon Supportive Housing program is a federal program designed to promote the development of supportive housing and supportive services to assist homeless persons in transitioning from homelessness, and to promote the provision of supportive housing to enable homeless persons to live as independently as possible.



Other	public - federal	Acquisition Admin and Planning Economic Development Financial Assistance Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Permanent housing placement Public Improvements Rental Assistance Supportive	0	0	0	0	0	<p>The State is committed to supporting the full recovery of all communities impacted by flood and wildfire disasters. As part of the recovery effort the State leverages resources from federal, state, philanthropic and private resources. Community Development Block Grant-Disaster Recovery Program (CDBG-DR) awards to the State include \$62,800,000 (December 16th, 2013), \$199,300,000 (June 3rd, 2014), and \$58,246,000 (January 13, 2015), for a total \$320,346,000. Please see Geographic Area Served for details of the disaster declarations served by these funds.</p>
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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: \$		
		services Other						
Other	public - federal	Acquisition Homebuyer assistance Multifamily rental new construction Multifamily rental rehab	19,057,011	0	0	19,057,011	38,000,000	Private Activity Bond Allocation: DOH has a Statewide Balance of \$19,057,011. These funds may be used for a variety of affordable housing and economic development purposes. While not a grant source, Private Activity Bonds provide tax exempt bonding authority to originate tax-exempt mortgages. For rental housing they also give projects access to 4% Low Income Housing Tax Credits.

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 Homeowner rehab Multifamily rental rehab	60,000	0	0	60,000	840,000	NSP-1 Program Income: Program income generated by projects undertaken through NSP1 funding. May be used to acquire, rehabilitate, and/or redevelop properties that are foreclosed, abandoned, or vacant, in designated census tracts that were heavily impacted by foreclosures in the economic downturn
Other	public - federal	Public Services	5,000,000	0	0	5,000,000	10,000,000	This program is federally funded from the Department of Health and Human Services to address poverty in Colorado. Dollars are distributed in a formula throughout Colorado to fund local needs to address poverty.
Other	public - federal	Rental Assistance	39,184,212	0	0	39,184,212	78,233,647	HCV Program: 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 Multifamily rental new construction Multifamily rental rehab New construction for ownership Overnight shelter	0	0	0	0	0	Colorado Housing Investment Fund: The State of Colorado received over \$50 million from the mortgage settlement with the 5 major banks, all custodial funds through the Attorney General's office, to be used for homeowner relief, foreclosure prevention and affordable housing. The Colorado Housing Investment Fund (CHIF) was created with part of those funds to address Colorado's need for affordable rental housing
Other	public - state	Housing	4,490,714	0	0	4,490,714	4,490,714	Homeless Solutions Program: Marijuana Tax Cash Fund for affordable housing.

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	Housing Rapid re-housing (rental assistance) Rental Assistance	47,000,000	0	0	47,000,000	6,700,000	The State of Colorado Housing Assistance for Persons Transitioning from Criminal or Juvenile Justice Cash Fund provides grants and loans for the acquisition, construction, or rehabilitation of rental housing for persons with both a mental health disorder, or co-occurring behavioral health disorder, and newly released from the Department of Corrections (DOC), the Division of Youth Corrections (DYC) in the Department of Human Services (DHS), or county jails throughout Colorado. Funding will also be provided towards rental assistance vouchers and rapid rehousing contingent on funding availability.

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	5,650,000	0	0	5,650,000	1,500,000	This is an annual allocation from the State's General Fund for grants to local governments in rural Colorado to improve economic development.
Other	public - state	Public Improvements Public Services Other	100,000	0	0	100,000	40,000	Energy and Mineral Impact Assistance Program: This is a community and economic development grant program that provides dollars via formula distribution and grants to Colorado local governments to address the impacts of oil, gas and mineral extraction activities in their communities. Funds come from the state severance tax. This program also funds a loan program for water and wastewater improvements and several initiatives including the Department's Main Street, Broadband, Best and Brightest Intern and University Technical.

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	2,746,313	0	0	2,746,313	5,501,000	State Housing Choice Vouchers: Funds provided by the state for housing choice vouchers

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 Division of Housing matches HOME funds with state loan funds spent on HOME eligible activities, local funding used in HOME projects, foundation funds and other HOME-eligible match sources are also used. The state loan funds include: Colorado Housing Investment Funds (CHIF), Housing Development Grants (HDG), Housing Development Loan Funds (HDLF).

ESG applicants must make matching contributions in an amount that equals the amount of ESG funds awarded by DOH. The matching contributions must meet all requirements that apply to the ESG funds provided by HUD. In the event that a subrecipient is unable to meet its matching requirements due to a financial hardship, it may request, in writing, an exception to this rule, with explanation of amount, nature and cause of the hardship. DOH shall consider such requests on a case by case basis.

The newly created Housing Assistance for Persons Transitioning from Criminal or Juvenile Justice Cash Fund, using state money from reappropriated from other sources, will be used to grant or loan funds for the construction and rehabilitation of permanent supportive housing for citizens transitioning from correctional facilities.

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

DOLA is not aware of any publically owned land or property that could be used to address needs identified in the plan.

**Discussion**

Private Activity Bonds are not funds to be awarded, but tax-exempt bonds that can be issued for specific purposes. The federal government grants annual allocations of this bonding authority to states.

DOH coordinates the use of LIHTC funds awarded by the Colorado Housing and Finance Authority (CHFA) through quarterly pipeline meetings and throughout the loan/grant underwriting process for each proposed project. Because DOH accepts applications for the types of projects that are LIHTC eligible monthly, we are able to accommodate CHFA's funding cycle. The quarterly "pipeline" meetings include members of development staff from DOH, Colorado Housing and Finance Authority (CHFA), Mile High Community Loan Fund, USDA Rural Development, and Department of Housing and Urban Development (HUD).

HTF was a new funding source in 2017, and will be used as a new affordable housing production program that will complement 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 homeless families.



## 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	2015	2020	Affordable Housing Homeless Non-Homeless Special Needs	State of Colorado	Additional Affordable Housing	CDBG: \$1,925,982 HOME: \$2,463,991 General Fund: \$2,050,000 Housing Trust Fund: \$2,000,000 Private Activity Bond Allocation: \$10,000,000	Rental units constructed: 555 Household Housing Unit Homeowner Housing Added: 65 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Disaster Recovery	2015	2019	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development Economic Development, Planning and Resiliency, Infrastructure	State of Colorado Flood Disaster Recovery Area	Additional Affordable Housing Community Development and Capital Improvements Economic Development Housing Rehabilitation Housing and Assistance for the Homeless Local Government Capacity Building Public Infrastructure Urgent Need/Disaster Recovery	CDBG-DR: \$140,000,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 183 Households Assisted Rental units constructed: 1200 Household Housing Unit Homeowner Housing Added: 64 Household Housing Unit Homeowner Housing Rehabilitated: 149 Household Housing Unit Direct Financial Assistance to Homebuyers: 56 Households Assisted Jobs created/retained: 1024 Jobs Businesses assisted: 244 Businesses Assisted Buildings Demolished: 63 Buildings Other: 10 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Homelessness Prevention and Alleviation	2015	2020	Homeless	State of Colorado	Additional Affordable Housing and Assistance for the Homeless	HOME: \$822,518 ESG: \$1,815,205 Continuum of Care: \$7,133,667 General Fund: \$2,050,000 Housing Trust Fund: \$1,000,000 Homeless Solutions Program: \$15,300,000	Tenant-based rental assistance / Rapid Rehousing: 130 Households Assisted Homeless Person Overnight Shelter: 21800 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 5 Beds Homelessness Prevention: 1300 Persons Assisted Housing for Homeless added: 230 Household Housing Unit
4	Preserve Existing Affordable Housing	2015	2020	Affordable Housing	State of Colorado	Acquire and Preserve Affordable Housing Stock. Housing Rehabilitation	CDBG: \$516,240 HOME: \$1,028,148 General Fund: \$4,100,000 NSP-1 Program Income: \$60,000 Private Activity Bond Allocation: \$10,000,000	Rental units rehabilitated: 380 Household Housing Unit Homeowner Housing Rehabilitated: 150 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Improve Public Infrastructure	2015	2020	Non-Housing Community Development	State of Colorado	Public Infrastructure	CDBG: \$1,900,000 Energy and Mineral Impact Assistance Program: \$100,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3800 Persons Assisted Jobs created/retained: 20 Jobs
6	Improve Housing Affordability	2015	2020	Affordable Housing	State of Colorado	Additional Affordable Housing and Assistance for the Homeless	CDBG: \$973,689 HOPWA: \$439,944 HOME: \$2,000,000 Section 811: \$1,045,690 Supportive Housing Program: \$4,989,637 Community Living Colorado Housing Vouchers: \$1,750,500 HCV Program: \$39,184,212 Private Activity Bond Allocation: \$564,550 State Housing Choice Vouchers: \$995,813	Direct Financial Assistance to Homebuyers: 100 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 7600 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Community Development and Capital Improvement	2015	2020	Non-Housing Community Development	State of Colorado	Community Development and Capital Improvements	CDBG: \$1,300,000 General Fund-Rural Economic Development: \$750,000 Limited Gaming Impact Program: \$4,900,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 550 Persons Assisted
8	Support Small Business Development	2015	2020	Non-Housing Community Development	State of Colorado	Economic Development	CDBG: \$8,500,000	Jobs created/retained: 850 Jobs
9	Affirmatively Further Fair Housing	2015	2020	All housing	State of Colorado	Affirmatively Further Fair Housing	CDBG: \$1,300	Other: 4 Other
10	Build Housing Non-Profit Capacity	2015	2020	Affordable Housing	State of Colorado	Housing Non-Profit Capacity Building	HOME: \$205,270	Other: 10 Other
11	Build Local Government Capacity	2015	2020	Non-Housing Community Development	State of Colorado	Local Government Capacity Building	CDBG: \$3,000 DPHS: \$5,000,000	Other: 10 Other
12	Demolition	2015	2020	Demolition of slum and blight	State of Colorado	Community Development and Capital Improvements	CDBG: \$200,000	Buildings Demolished: 10 Buildings

Table 6 – Goals Summary

## Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Increase Supply of Affordable Housing
	<b>Goal Description</b>	The Division of Housing (DOH) will help to increase the affordable housing supply by providing funding for construction of both rental and ownership housing that is designated to be affordable to households and individuals whose income falls below 80% of the area median. DOH will maximize funding for housing affordable to families/households at the extremely-low and very-low income levels as much as possible and still make individual projects financially sustainable. Funding will come primarily from HOME Investment Partnership funds, but CDBG funds may be used to acquire property or to cover soft costs. Other primary funding resources will include the state Housing Development Grant fund and Housing Development Loan fund, as well as the Colorado Housing Investment Fund.
<b>2</b>	<b>Goal Name</b>	Disaster Recovery
	<b>Goal Description</b>	This funding from the additional CDBG Disaster Recovery grants would be used to provide housing to Coloradans displaced from their homes by disasters that occurred during the 2013 flood. Disaster recovery grants will also help provide funding to meet non-housing needs created by the floods such as repair or replacement of damaged infrastructure and assistance to impacted businesses. No specific set aside has been made from our regular CDBG allocation for this purpose, but it is high on the list of priorities for this year because it is urgent and expected to occupy significant staff time and effort.
<b>3</b>	<b>Goal Name</b>	Homelessness Prevention and Alleviation
	<b>Goal Description</b>	One of the primary goals in the coming year is to focus on increasing access to housing units (particularly for the chronically homeless, veterans, persons with disabilities, and youth) through the continuum of housing. The Office of Homeless Initiatives (OHI) team will work towards the production of new permanent supportive housing units by providing leadership and technical assistance to local partners on the housing development process and resources. In 2014, the OHI partnered with the Colorado Housing and Finance Authority and Enterprise Community Partners to launch the “Pathways Home Supportive Housing Toolkit,” in which six communities participated in a permanent supportive housing capacity building workshop. Due to a number of interested partners statewide, the OHI will be continuing these toolkits. Not only will this work shorten the period of time that individuals and families experience homelessness, the OHI will also facilitate increased access to affordable housing units.

4	<b>Goal Name</b>	Preserve Existing Affordable Housing
	<b>Goal Description</b>	The Division of Housing (DOH) will provide funding for the acquisition and rehabilitation of affordable rental housing, especially to preserve existing affordable units as affordable, and to improve the condition of existing affordable housing stock. DOH will also fund single-family rehabilitation programs that provide low-cost loans to low/moderate income homeowners to keep their homes habitable.
5	<b>Goal Name</b>	Improve Public Infrastructure
	<b>Goal Description</b>	Help communities with the installation of public infrastructure items such as water system, sanitary sewer system and/or storm drainage system improvements that will either: 1.) remedy problems from the existing system(s) being under-sized, leaky, out of regulatory compliance or obsolete, benefiting over 51% low to moderate income persons living in the entire community or in the specific area where the improvements are made; or 2.) benefit start-up and/or expanding businesses in a community that create or retain jobs, at least 51% of which will be filled by persons of low to moderate income.
6	<b>Goal Name</b>	Improve Housing Affordability
	<b>Goal Description</b>	Activities associated with this goal reduce the cost of housing by rental assistance, down payment assistance or contributions to development costs that will ultimately reduce the cost to the consumer, such as subsidies for Habitat for Humanity housing or land trust housing.
7	<b>Goal Name</b>	Community Development and Capital Improvement
	<b>Goal Description</b>	Provide financial assistance to rural communities to implement community development and capital improvement activities. Includes acquisition of property (to be used for public facilities), and construction or reconstruction of public facilities that primarily benefit low/moderate income persons.
8	<b>Goal Name</b>	Support Small Business Development
	<b>Goal Description</b>	Provide assistance to small businesses to start or expand their operations, and partner with local banks to fill gaps in financing packages so that 51% of jobs created or retained are filled by persons of low to moderate income.

9	<b>Goal Name</b>	Affirmatively Further Fair Housing
	<b>Goal Description</b>	
10	<b>Goal Name</b>	Build Housing Non-Profit Capacity
	<b>Goal Description</b>	This goal includes CHDO operating funding for pre-development and capacity building, resulting in the production of housing units, down payment assistance loans or rehabilitation loans within two years.
11	<b>Goal Name</b>	Build Local Government Capacity
	<b>Goal Description</b>	Increase the capacity of local governments to administer federal grants that facilitate the development of sustainable communities through training classes offered by the Department of Local Affairs, Division of Local Government. Accomplishments will be measured by the number of local governments which participate in the training.
12	<b>Goal Name</b>	Demolition
	<b>Goal Description</b>	Demolition of slum and blight



## AP-25 Allocation Priorities – 91.320(d)

### Introduction:

The table below represents an estimate of the percentage of each type of funding DOLA anticipates using for each of our goals. Actual awards and expenditures may differ from this since the methods of allocation are based on competitive processes.

### Funding Allocation Priorities

	Increase Supply of Affordable Housing (%)	Disaster Recovery (%)	Homelessness Prevention and Alleviation (%)	Preserve Existing Affordable Housing (%)	Improve Public Infrastructure (%)	Improve Housing Affordability (%)	Community Development and Capital Improvement (%)	Support Small Business Development (%)	Affirmatively Further Fair Housing (%)	Build Housing Non-Profit Capacity (%)	Build Local Government Capacity (%)
HOME	45	0	0	40	0	10	0	0	0	0	
HOPWA	0	0	0	0	0	0	0	0	0	0	
ESG	0	0	100	0	0	0	0	0	0	0	
General Fund	50	0	0	50	0	0	0	0	0	0	
Housing Trust Fund	40	0	40	20	0	0	0	0	0	0	
Section 811	0	0	0	0	0	100	0	0	0	0	
Supportive Housing Program	0	0	100	0	0	0	0	0	0	0	
Other CDBG-DR	0	100	0	0	0	0	0	0	0	0	
Other Colorado Housing Investment Fund	50	0	0	50	0	0	0	0	0	0	

Other Community Living Colorado Housing Vouchers	0	0	0	0	0	100	0	0	0	0	0
Other DPHS	0	0	0	0	0	0	0	0	0	0	0
Other Energy and Mineral Impact Assistance Program	0	0	0	0	100	0	0	0	0	0	0
Other General Fund-Rural Economic Development	0	0	0	0	25	0	25	25	0	0	0
Other HCV Program	0	0	0	0	0	100	0	0	0	0	0
Other Homeless Solutions Program	25	0	25	25	0	25	0	0	0	0	0
Other Limited Gaming Impact Program	0	0	0	0	50	0	50	0	0	0	0
Other NSP-1 Program Income	50	0	0	50	0	0	0	0	0	0	0

Other Private Activity Bond Allocation	75	0	0	25	0	0	0	0	0	0	0
Other State Housing Choice Vouchers	0	0	0	0	0	100	0	0	0	0	0

**Table 7 – Funding Allocation Priorities**

**Reason for Allocation Priorities**

Some allocations above are clear - for example, Emergency Solutions Grant funding is specifically for preventing homelessness and assisting and rehousing people experiencing homelessness. The exact allocation priorities of the other resources is very difficult to determine. It will depend on the types of projects for which DOLA receives applications and the specific features of a project will determine which funding source is most suitable. Supportive Housing is defined as affordable community-based housing that provides people with disabilities or special needs with links to supportive services.

HTF State Limited Beneficiaries or Preferences- § 91.320(k)(5)(vii)

The State will limit beneficiaries and/or give preferences to the following segments of the extremely low-income population:

- People with disabilities or other special needs (e.g. individuals/families exiting homelessness).

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

Funding will be directed toward the projects that best fit each program’s statutory and regulatory requirements and meet the needs of local communities for economic development, public infrastructure, facilities and services, and housing for those least able to afford it.

## 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), Emergency Solutions Grants (ESG), Housing Opportunities for Persons with AIDS (HOPWA), and Housing Trust Fund (HTF) 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 portions once funds are taken out for administration. Each portions represents Housing, Public Facilities or Economic Development. The Division of Housing administers CDBG Housing funds, the Division of Local Government administers CDBG Public Facility Funds and the Governor's Office of Economic Development and International Trade administers Economic Development CDBG Funds. Generally, if there are available funds in any one portion 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. DOLA will distribute CDBG resources through a competitive process to eligible non-entitlement local governments through the divisions who administer these programs.

### Distribution Methods

**Table 8 - Distribution Methods by State Program**

<b>1</b>	<b>State Program Name:</b>	Economic Development
	<b>Funding Sources:</b>	CDBG
	<b>Describe the state program addressed by the Method of Distribution.</b>	The economic development use of CDBG funds is administered by the Governor's Office of Economic Development and International Trade (OEDIT), and receives a one-third share of Colorado's annual non-entitlement CDBG allocation. OEDIT will accept and consider 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 those that would provide funding through local or regional loan funds, infrastructure to benefit specific businesses, and feasibility/planning studies to benefit specific businesses.

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>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.</p> <p>Other review criteria include:</p> <ul style="list-style-type: none"> <li>· Consistency with local development strategies and coordination with other activities;</li> <li>· 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</li> <li>· Management Capability - the ability of the local government submitting the proposal to administer the project as described either through their own staff or contractors.</li> <li>· 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?</li> <li>· 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?</li> </ul> <p><b>For economic development projects that involve grants or business loan funds or loan guarantees:</b></p>
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<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Additional information can be accessed through the website and Colorado's CDBG Guidebook also posted on the web.</p>
<p><b>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)</b></p>	
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	

<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Colorado Governor's Office of Economic Development and International Trade (OEDIT) will accept and consider 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 those that would provide:</p> <ul style="list-style-type: none"> <li>· Funding through local or regional loan funds</li> <li>· Infrastructure to benefit specific businesses and Feasibility/planning studies to benefit specific businesses.</li> </ul>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>There are no minimum or maximum grant size limits for economic development.</p>
<p><b>What are the outcome measures expected as a result of the method of distribution?</b></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. This method of distribution will provide economic opportunity to help create sustainable communities.</p>

<b>2</b>	<b>State Program Name:</b>	Emergency Solutions Grants
	<b>Funding Sources:</b>	ESG
	<b>Describe the state program addressed by the Method of Distribution.</b>	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.
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	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.
	<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	



<p><b>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)</b></p>	<p>The notice of funding availability (NOFA) is published once per year on the Division of Housing website to make its allocation available to the various agencies. The Division of Housing is publishing 2017-2018 NOFA prior to Action Plan approval to accommodate the requirement at 24 CFR 576.203(a). Funds are awarded to state recipients using the scoring sheet system described above, followed by a review and recommendation of the Asset Manager, Deputy Director/Housing Programs Manager, and Director. Many of the applicants are continuing programs and agencies who Division of Housing has worked with in previous years.</p>
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></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 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><b>Describe threshold factors and grant size limits.</b></p>	<p>The exact funding amount provided for ESG varies each year. Once an amount is allocated to Division of Housing, the number and amount of grants to be awarded is determined. There is not a grant size limit, however our average grant size is approximately \$15,000 per grantee. Because many of our applicants are continuing programs from agencies we have worked with previously, most of the applications request the same or similar amounts as the years prior. We are able to adjust the threshold factors and grant size limits based on the number of returning and new applications we get each year compared to the funding provided.</p>
	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>Emergency Solutions Grant funds used to support emergency shelters create available suitable living environments for the homeless; 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>
<p><b>3</b></p>	<p><b>State Program Name:</b></p>	<p>Homeownership Down Payment Assistance/Equity Sharing</p>
	<p><b>Funding Sources:</b></p>	<p>CDBG HOME General Fund</p>

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>Funded with HOME, CDBG, or HDG Division of Housing (DOH) provides grant funds to regional housing organizations to provide down payment assistance loans to low and moderate-income families and administrative funding for program operation. 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"> <li>· Provide opportunities for low and moderate-income Coloradans to purchase their own homes;</li> <li>· Increase the number of homeowners in the regional housing organization's service area;</li> <li>· Create and maintain a regional revolving loan fund to assist future families with Down Payment Assistance;</li> <li>· Enhance neighborhoods and communities; and,</li> <li>· Provide stability for families and achieve lower foreclosure rates by requiring pre-homeownership counseling.</li> </ul> <p>Annual follow-up with families is highly recommended, as well as foreclosure prevention through pre-homeownership counseling.</p>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></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"> <li>· The need for the program;</li> <li>· Program sustainability;</li> <li>· Financial, administrative, and management capacity of the applicant;</li> <li>· Geographic coverage;</li> <li>· Applicant's past performance as a grantee of the state;</li> <li>· Application thresholds;</li> <li>· Administrative fees;</li> <li>· Cost effectiveness;</li> <li>· Cost containment guidance;</li> <li>· Cost ranges;</li> </ul> <p>·If applicable, program income fund balance.</p> <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. DOH accepts applications once a year for the competitive application cycle that allows for the direct comparison of programs to ensure funding goes to the applications with the best merits.</p>
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<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>All potential applicants are able to access application instructions, CDBG guidebook, Revolving Loan Fund Program Guidelines, and other state publications describing the application criteria on the Division of Housing website: <a href="https://www.colorado.gov/dola">https://www.colorado.gov/dola</a></p>
<p><b>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)</b></p>	
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	

<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Revolving Loan Fund or recycled HOME program income Homeownership Programs for single-family owner-occupied homes loan funds to the homeowner for down payment assistance. The funds are retained by the local agency operating the program and are re-lent to new homebuyers. Additional information can be found in the Revolving Loan Fund Program Guidelines.</p> <p>Recommendations on resource allocation among funding categories are determined following the application criteria 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 utilized for each project and program by following HUD and funding source regulations, and by availability of funds.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>Each proposed RLF or recycled HOME program income program is evaluated using the Division of Housing evaluation criteria which are detailed in its application instructions.</p> <p>There are no grant size limits for Homeownership DPA. However, in 2014 our average DPA award was \$200,000 with a total of \$2,000,000. Our awarded amounts ranged from \$32,000 to \$343,000. In 2015, our average award was \$150,000 with a total in federal funds awarded to DPA programs of \$730,000. Our award amounts ranged from \$24,000 to \$432,000. In general, 2 years maximum if PI is considered appropriate for RLF programs.</p>

	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>The outcome measures expected for this RLF program are improved affordability of decent housing</p>
<p><b>4</b></p>		
<p><b>5</b></p>		

6	<b>State Program Name:</b>	Housing Opportunities for Persons with AIDS (HOPWA)
	<b>Funding Sources:</b>	HOPWA
	<b>Describe the state program addressed by the Method of Distribution.</b>	The resources of the HOPWA program are granted to Colorado Health Network (CHN). CHN distributes funds through its regional offices: Southern Colorado AIDS Project, Western Colorado AIDS Project, Northern Colorado AIDS Project and Denver Colorado AIDS Project. However, funds granted to the State are used outside of the Denver area. 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 allocation 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.



<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></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><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	
<p><b>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)</b></p>	

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>The Balance of State HOPWA program was designed in partnership with Colorado Health Network, 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><b>Describe how resources will be allocated among funding categories.</b></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 Colorado Health Network. 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 and amount consistent with 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><b>Describe threshold factors and grant size limits.</b></p>	<p>The grant size is limited by the amount of funding available under each annual HOPWA allocation.</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	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).
7	<b>State Program Name:</b>	Housing Trust Fund (HTF)
	<b>Funding Sources:</b>	Housing Trust Fund
	<b>Describe the state program addressed by the Method of Distribution.</b>	The Housing Trust Fund (HTF) is a new affordable housing production program that will complement 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 homeless families.
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	<p>Threshold:</p> <ul style="list-style-type: none"> <li>-Applicant's ability to obligate HTF funds</li> <li>-Applicant's ability to undertake eligible activities in a timely manner</li> </ul> <p>Remaining Priorities</p> <ul style="list-style-type: none"> <li># Priority based upon geographic diversity</li> <li># For rental housing, the extent to which the project has Federal, State or local project-based rental assistance so rents are affordable to extremely low-income families</li> <li># For rental housing, the duration of the units' affordability period</li> <li># 1: The merits of the application in meeting the State's priority housing needs</li> </ul>

	<p>(please describe)</p> <p># The extent to which application makes use of non-federal funding sources Other (please describe). Please attach response if you need additional space.</p> <p>Colorado will distribute HTF funds by selecting applications submitted by eligible recipients. 100 percent of the HTF funds will benefit extremely-low income households.</p> <p>An applicant’s ability to obligate HTF funds, undertake eligible activities in a timely manner, and own/manage/operate a 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).</p> <p>Applications that fail to meet all of Colorado’s threshold criteria (HTF threshold criteria above and other threshold criteria in Colorado’s funding application) will not be considered for HTF funding. Applications that meet Colorado’s threshold criteria will be prioritized for HTF funding based on the following criteria:</p> <p>The first and second funding priorities will be given to applications that meet the State’s priority housing needs by: 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 HTF funding. The Supportive Housing priority (#1) aligns with Colorado’s Priority Need for “Housing and Assistance for the Homeless”. 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 for “Additional Affordable Housing” and “Acquire and Preserve Affordable Housing Stock”.</p> <p>The third 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>The fourth funding priority will be for leveraging. 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 fifth funding priority will be 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><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>N/A</p>
<p><b>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)</b></p>	<p>N/A</p>

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>N/A</p>
<p><b>Describe how resources will be allocated among funding categories.</b></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><b>Describe threshold factors and grant size limits.</b></p>	<p>The maximum per-unit development subsidy limit for housing assisted with HTF funds will be adjusted for the number of bedrooms and based upon the geographic location of the units. 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>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	The outcome measures expected as a result of the method of distribution is increased affordable housing and prevention/alleviation of homelessness. 100 percent of the funds will be used to serve extremely low-income households.
8	<b>State Program Name:</b>	Community Housing Development Organization Operating Grants
	<b>Funding Sources:</b>	HOME
	<b>Describe the state program addressed by the Method of Distribution.</b>	Certified 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 the requests and simultaneously review documentation submitted to re-certify the agency as a CHDO.

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>Agencies provide copies of their articles, bylaws, Board of Directors names and sector representing, staff bios, business plan, financial stats, letters of local funding match (for entitlement areas), and memorandum of understanding with DOH to begin construction on new development within 24 months. Developers also review CHDO's progress on previously identified projects.</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	
<p><b>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)</b></p>	



<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>CHDO operating funds are generally awarded to all agencies meeting the threshold requirements and demonstrating capacity to complete projects identified in their business plan. Agencies in rural areas without local contribution are prioritized based on staff review of need for funding.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>Successful completion of previously identified projects is required. A business plan identifying new development or acquisition activities is required. Because of the number of CHDOs requesting operating funds, grants are generally \$20,000-\$50,000 per agency.</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	DOH expects all CHDOs receiving operating funds to increase the number of affordable housing units through acquisition of existing market rate housing and restricting them to low/moderate income households or in creating new affordable units.
9	<b>State Program Name:</b>	Public Facilities
	<b>Funding Sources:</b>	CDBG
	<b>Describe the state program addressed by the Method of Distribution.</b>	This state program funds improvements in public infrastructure, such as water and sewer or drainage systems, and public facilities like day care centers or hospitals.

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>Final funding decisions are made by the Executive Director of the Colorado Department of Local Affairs with input from 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, and Management Capacity.</p> <p>Other review criteria include:</p> <ul style="list-style-type: none"> <li>· Consistency with local development strategies and coordination with other activities;</li> <li>· 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</li> <li>· Management Capability - the ability of the local government submitting the proposal to administer the project as described either through their own staff or contractors.</li> <li>· 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?</li> </ul> <p>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>
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<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></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 target 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 targeted 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 will have 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: <a href="http://www.dola.state.co.us/LGS/FA/cdbg.htm">www.dola.state.co.us/LGS/FA/cdbg.htm</a>.</p> <p>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 gives this Guidebook to grantees in hard copy at the time of award.</p>
<p><b>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)</b></p>	

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>For public facilities or community development projects, there is no breakdown among funding categories. Funding is subject to local government’s applications and eligibility requirements.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>The department suggests that \$600,000 be considered the maximum grant guideline 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 consider increasing this maximum. Applications are reviewed through funding cycles that are announced on the web and made known through state associations. Typically, only one cycle is held per year. Additional cycles may be announced if sufficient funds remain.</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	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.
10	<b>State Program Name:</b>	Single-Family Owner-Occupied Rehabilitation/Home Modification
	<b>Funding Sources:</b>	CDBG HOME General Fund

<p><b>Describe the state program addressed by the Method of Distribution.</b></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"> <li>· Preserve, enhance, and maintain affordable housing stock through repair and renovation within the community;</li> <li>· Protect the health and safety of the occupants through the correction of housing hazards;</li> <li>· Assist homeowners in improving the condition of their homes;</li> <li>· Allow homeowners to stay in their homes and not be forced to move due to a lack of accessibility;</li> <li>· Assist homeowners to improve their home’s energy efficiency;</li> <li>· Create and maintain regional revolving loan funds to assist with future housing rehabilitation projects; and</li> <li>· Develop and sustain a network of local contractors to complete housing repairs and renovations.</li> </ul>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></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"> <li>· The need for the program;</li> <li>· Program sustainability;</li> <li>· Financial, administrative, and management capacity of the applicant;</li> <li>· Geographic coverage;</li> <li>· Applicant's past performance as a grantee of the state;</li> <li>· Application thresholds;</li> <li>· Administrative fees;</li> <li>· Cost effectiveness;</li> <li>· Cost containment guidance;</li> <li>· Cost ranges.</li> </ul> <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>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></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: <a href="http://www.Colorado.gov/DOLA">www.Colorado.gov/DOLA</a>.</p>



<p><b>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)</b></p>	
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></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><b>Describe threshold factors and grant size limits.</b></p>	<p>Each proposed rehab program is evaluated using the Division of Housing evaluation criteria which are detailed in its application instructions.</p> <p>We do not have a threshold factors or grant size limits for SFOO. In 2014, our average awarded amount was \$226,689 with a range of \$39,000 and \$509,000. We awarded a total amount for SFOO of \$1,586,825. In 2015, our average awarded amount was \$273,000 with a range of \$93,000 to \$534,000. Our total amount awarded was \$2,000,000.</p>
	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>outcome of these rehab programs is expected to improve availability/accessibility of decent affordable housing that meets the needs of its occupants.</p>
<p><b>11</b></p>		

<b>12</b>		
<b>13</b>	<b>State Program Name:</b>	Tenant Based Rental Assistance
	<b>Funding Sources:</b>	HOME

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>Tenant Based Rental Assistance (TBRA) is a HOME program supporting two Division of Housing (DOH) programs to assist:</p> <ol style="list-style-type: none"> <li>1. Homeless families in need of housing; and,</li> <li>2. Assist households moving from institutions.</li> </ol> <p>This program current assists homeless families identified by the Department of Education and individuals being released from institutions by:</p> <ul style="list-style-type: none"> <li>· Providing temporary housing assistance that allows participants to stabilize their lives;</li> <li>· Providing case management to assist participants in obtaining long term housing;</li> <li>· Stabilizing participants and helping them move past multiple issues in their lives including limited job skills and/or lack of problem solving ability, evictions and poor credit; and,</li> <li>· Providing opportunities with responsibility to participate</li> </ul> <p>Participants are expected to apply for Section 8 (rental assistance, or obtain an affordable unit, e.g. Low-Incomes Housing Tax Credit, other subsidized unit or other housing assistance);</p> <p>Participants are expected to work with a case manager and complete case management goals to secure long term housing.</p>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>Applications are accepted by the first of every month throughout the year. Review criteria may include but are not limited to the following:</p> <ul style="list-style-type: none"> <li>· Project need;</li> <li>· Project sustainability;</li> <li>· Financial, administrative, and management capacity of the applicant;</li> <li>· Geographic coverage;</li> <li>· Applicant's past performance as a grantee of the state;</li> <li>· Cost effectiveness; and,</li> <li>· Cost containment guidance.</li> </ul> <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 monthly for this.</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	

<p><b>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)</b></p>	
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></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><b>Describe threshold factors and grant size limits.</b></p>	<p>The working policy has always been a program size of no more than 30 families for TBRA grants. This translates into different funding amounts because each market has different rent characteristics. With the current RFA, CDOH has capped total funding available for TBRA programs to \$1MM in the first 12 months of a contract.</p>
<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>The outcome of these programs is expected to be improved affordability of decent housing.</p>

**Discussion:**

All methods of distribution are designed to meet specific program requirements and to ensure the most effective use of the funds by incorporating competitive processes in the HOME, CDBG, HOPWA, ESG, and HTF distribution.

Starting in 2017 and on-going, the State will prioritize any CDBG or HOME Program Income funds held at the sub-grantee or sub-recipient level (i.e. local government or agency level) that may be returned to the State to be loaned or granted back to eligible projects or programs in that same jurisdiction or region. The State will analyze the balance of local level CDBG or HOME Program Income amounts to ensure appropriate funds for approximately 2-years of revolving loan fund volume. If excess CDBG or HOME Program Income is available, the State will develop a policy for re-capture of funds with a priority to fund eligible projects or programs in that same target area.



## AP-35 Projects – (Optional)

### Introduction:

Projects will be added throughout the program year. An amendment will be made to this Action Plan in March of 2019 to include all projects from 2018 program year.

#	Project Name

Table 9 – Project Information

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

**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**

N/A

**Acceptance process of applications**

N/A

## **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**

The State does not approve revitalization strategies for local governments. However, the State through DOLA, operates the Colorado Main Street program which works with communities throughout Colorado to revitalize their historic commercial districts. The Main Street approach is a nationally recognized, successful program in which communities apply a comprehensive approach to improving their districts, creating jobs, and building a stronger economic base, all while preserving the character of the community.

## **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 Department of Local Affairs distributes its funding using competitive applications processes for all funding other than HOPWA. This means that geographic distribution cannot be predicted, and will often be determined by the capacity of local governments and non-profits to carry out projects successfully and in compliance with program regulations. This may result in geographic distribution that is not consistent with geographic need.

In September 2013, Colorado suffered catastrophic flooding as a result of unprecedented rainfall across twenty-four counties in the State, of which 18 were Presidentially Declared Disaster Areas[1]. The floods impacted the entire social fabric of the State, causing major destruction to housing, businesses, and infrastructure. The Department of Local Affairs includes prioritization of these flood impacted areas in the use of all funding programs other than HOPWA, without exclusion of any projects on the basis of their location.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
State of Colorado	100
Flood Disaster Recovery Area	

**Table 10 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The Flood Disaster Recovery area will receive all of the CDBG-DR funding that has been awarded to the State. All other funding from the annual allocations of CDBG, HOME, HOPWA, ESG, and HTF will be used throughout the rest of the state.

### **Discussion**

## Affordable Housing

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

#### Introduction:

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	835
Non-Homeless	8,030
Special-Needs	200
Total	9,065

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

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	6,885
The Production of New Units	2,000
Rehab of Existing Units	150
Acquisition of Existing Units	30
Total	9,065

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

#### Discussion:

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

### **Introduction:**

Housing assistance provided by the Division of Housing (DOH) is funded by HUD. These federal funds are used in the administration of the Housing Choice Voucher program. DOH has jurisdiction to serve all 64 counties within the state.

The current rental assistance programs retain the number of vouchers formerly targeted to persons with special needs including those with developmental, mental health, substance abuse and/or physical disabilities. DOH partners with thousands of private landlords and approximately 50 community-based service providers across the State to combine housing assistance with supportive services. These providers include: mental health centers, centers for independent living, community center boards, and homeless service providers. The four-way partnership between DOH, the service agency, the property owner and the participant ensures an effective and efficient approach to providing housing and supportive services to some of Colorado's most vulnerable citizens.

Other Housing Choice Vouchers are also targeted to people most in need; however preferences are provided to a wide array of individuals including people experiencing homelessness, survivors of domestic violence, and other disenfranchised populations. DOH primarily partners with local housing authorities, many in rural areas, to administer these vouchers.

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

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

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

The State does not operate public housing and therefore does not plan resident initiatives. However, the State does encourage its partner organizations in their efforts to provide resident initiatives in their public housing properties.

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

The Division of Housing PHA is not designated as troubled.

### **Discussion:**

The Division of Housing (DOH), like all HUD-funded public housing authorities, is required to follow the Department of Housing and Urban Development's (HUD) program regulations. HUD clearly outlines participant obligations, program administration regulations, and required statutes for public housing authorities to follow. However, DOH has designed an approach to administering the very regulation-

intensive Housing Choice Voucher (HCV) Program that complies with HUD regulations while keeping the unique needs and successes of its participants as the primary goal.

DOH contracts/partners with 66 nonprofit disability providers, homeless providers and housing authorities across Colorado in addition to other community housing partners. Partnerships include 15 of Colorado's Community Mental Health Centers, all but two of the State's Community Center Boards, and many of the Independent Living Centers. Through these partnerships, each HCV participant is assigned an agency residential coordinator with whom they work directly to complete the required housing processes. In addition, most participants also have access to case management services to assist in other aspects of their lives. Most residential coordinators have experience and training working with persons with disabilities and/or special needs. This training brings a level of support that is unmatched at most public housing agencies. If a participant does not complete the necessary paperwork, or does not attend a scheduled meeting, the participant is not terminated but rather the residential coordinator reaches out to the participant, visiting their home if necessary.

DOH has also implemented alternatives to termination by considering all circumstances including an individual's disability and the role the disability may have played in the program violation. DOH only proceeds to immediate termination in the most extreme cases. In all other circumstances, DOH implements its termination process that involves conferences with program participants where the program violations are discussed and alternatives to termination are developed. The close relationship with DOH's agency partners often facilitates successful resolutions by bringing all interested parties to participate in a dialogue.

Additionally, DOH provides statewide training opportunities designed to assist both the public and private sector housing providers in working with persons with disabilities and other special needs populations. The trainings cover topics such as Fair Housing and are designed to educate the housing community on housing persons with disabilities.



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

### **Introduction**

In 2012, DOH created the Homeless Programs Team (HPT), now named the Office of Homeless Initiatives (OHI), in partnership with the Governor’s Office made up of key personnel from DOH. OHI provides expertise on housing and services for people experiencing homelessness or at risk of homelessness. Specifically, OHI works towards solutions for all Coloradans unstably housed or homeless, including families with children, senior citizens, veterans, persons with disabilities, those who experience chronic homelessness and, through the Office of Homeless Youth Services, youth. OHI focuses exclusively on ending and preventing homelessness for Colorado’s most vulnerable citizens. Activities carried out by OHI include the facilitation of partnerships to create more permanent supportive housing, management of Federal Supportive Housing Programs serving those with special needs and advising the Emergency Solutions Grant (ESG) allocation. OHI advises other DOH staff members and the DOH Director on the regional needs to address homelessness, makes funding recommendations for programs statewide and researches, analyzes and sets policies to address homelessness statewide.

The addition of HTF will increase our work with people experiencing homelessness and special needs population by allowing increased funding for extremely-low income individuals. Community-based supportive housing projects are a Colorado priority for the use of HTF funds.

### **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**

OHI will continue to work closely with the Governor’s office and other state agencies to continue to use data from the Vulnerability Index assessment tool in communities around the state to identify the most vulnerable individuals experiencing homelessness. With the information gleaned from the Vulnerability Index along with the annual HUD Point-in-Time survey data, the HPT makes funding and policy recommendations for new supportive housing and programmatic partnerships. An example of this in the coming year is increased community-based efforts for coordinated assessment and housing placement efforts for homeless Veterans in multiple communities throughout each CoC.

DOH works with community partners to assess the individual needs of program participants and works to fund housing placement services and a continuum of service-enriched housing from very intensive services, serving chronically homeless individuals for example, to less intensive “step up” supportive housing models with case management services available as needed.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

While OHI prioritizes permanent supportive housing, DOH also works to address emergency shelter and

transitional housing needs of homeless persons. Each community's needs for emergency and transitional housing are determined by the population that they serve, mainly through the survey data collected statewide. Many communities are in need of additional emergency shelters and transitional housing units. OHI will recommend funding, specifically through the ESG program, to shelters and transitional housing programs which aim to connect individuals experiencing homelessness to permanent housing as quickly as possible. DOH will continue awarding ESG funding to local HUD Continuum of Care organizations in order to give local organizations a greater ability to prioritize programs based upon their unique needs. Additionally, OHI advises DOH staff and Housing Development Specialists on emergency shelter and transitional housing projects that are appropriate for and in need of federal CDBG, HOME, and HTF funds in order to serve homeless individuals and families. Lastly, DOH has led a pilot project which converted a recently closed state prison, the Fort Lyon facility in Bent County, CO, into transitional housing. Specifically, the Fort Lyon Supportive Residential Community (Fort Lyon) combines many state, local, federal, and private resources (including mortgage settlement funds awarded to Colorado) to provide a place for chronically homeless individuals and veterans to transition from homelessness to permanent housing. For the past two years, Fort Lyon has provided stabilization and connection to recovery-oriented and health services for those experiencing chronic homelessness through intensive services and access to permanent housing upon exit.

**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**

One of the primary goals in the coming year for OHI is to continue to focus on increasing access to housing units (particularly for the chronically homeless, veterans, persons with disabilities, and youth) through the continuum of housing. This calls for collaboration and capacity building at the local level to help communities identify their service gaps and most vulnerable populations with the longest histories of homelessness. Also, OHI will work towards the production of new permanent supportive housing units by providing leadership and technical assistance to local partners on the housing development process and resources. Not only will this work shorten the period of time that individuals and families experience homelessness; the HPT will also facilitate increased access to affordable housing units. The team will accomplish this by working with new and existing projects to promote unit set-asides for targeted populations (e.g. chronically homeless, veterans, persons with disabilities, or youth) and recommend incentives for this such as project-based voucher allocations for projects dedicating units to priority populations.

A priority of the new HTF allocation will be dedicated for permanent rental housing and supportive housing projects serving homeless individuals. In addition, the primary goal of using HTF funds is to create units for extremely low-income individuals throughout Colorado. There is currently a shortfall of over 100,000 rental units for households earning less than \$20,000 per year. Although the initial \$3

million in HTF funding will not be sufficient for filling this gap, the continued efforts to create more housing options for extremely low-income households remains a top priority.

**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**

DOH will continue to provide temporary homelessness prevention services and funding through the ESG grant. OHI is collaborating with numerous other agencies as part of the Pathways Home Colorado initiative to prevent homelessness by increasing the supply of affordable housing, improving access to mainstream benefits, improving access to education and employment opportunities, improving access to the supportive services needed by some populations to maintain housing. A copy of the Pathways Home Colorado document is attached to this AAP.

## **Discussion**

DOH is pleased to report the progress of OHI and our efforts as a State towards preventing and ending homelessness. We hope that our model of establishing OHI to provide leadership and focus specifically on housing for special needs populations is one that can be successfully replicated in other States and Regions.

The Office of Homeless Initiatives (OHI) supports the creation of cost-effective and humane interventions for highly vulnerable individuals and families experiencing homelessness. OHI has made significant progress in this endeavor through a number of efforts including the Pathways Home Supportive Housing Toolkit, a 5-month capacity-building curriculum that in combination with the Joint-Underwriting initiative with the Colorado Housing and Finance Authority, has led to the creation of 229 units of Permanent Supportive Housing in 2016, 375 units in 2017, and is expected to produce more than 800 new units over the next two years.

**AP-70 HOPWA Goals – 91.320(k)(4)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	0
Tenant-based rental assistance	65
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
<b>Total</b>	<b>65</b>

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

### **Introduction:**

The State's rapid development from the early 1990s to early 2000s made growth management issues a concern for State and local elected officials in Colorado and caused many communities to adopt policies that growth should "pay its own way." This resulted in sometimes complex impact fee structures. These growth-control policies and fees remain in place and continue to work against development of affordable housing.

Growth control policies can serve either as management tools controlling and directing appropriate development – or as regulatory barriers to prevent additional development. This is most apparent in housing development, which is affected by every tool a community might use to control growth. Tools include annexation and zoning policies, both in terms of the amount of land available for residential development and its density; subdivision design and engineering standards; impact fees for infrastructure and other public facilities; building codes; limits on the number of building permits allowed each year; and regulations to protect environmental and cultural resources.

The Division defines "regulatory barriers" as either deliberate or de facto actions that prohibit or discourage construction of affordable housing without reasons directly related to public health and safety. Additionally, a regulatory barrier can be a Federal, State, or local statute, ordinance, policy, custom, practice, or procedure that excessively increases the cost of new or rehabilitated housing, either by improperly restricting the location of housing, or by imposing unjustified restrictions on housing development with little or no demonstrated compensating assistance.

The problems created by regulatory barriers are compounded by the "not in my backyard" issues. The problem of finding suitable sites for affordable housing or community development projects continues to be a problem in Colorado. Many neighborhoods are unwilling to have mixed income rental units, housing for persons with special needs or senior housing. This lack of understanding and fear of affordable housing residents also hampers efforts to expand Colorado's affordable housing inventory

### **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 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, and application workshops for housing.

DOH provides technical assistance to local governments that want to modify land use regulations in order to encourage affordable housing development. During our application review process, the Division makes it a priority to assess a local government's financial contribution compared to the impact its

regulations and policies have on the total project cost.

The primary way the Division will provide technical assistance is through its ongoing discussions with local governments during project funding. The Division will also provide workshops for local government officials about regulatory barriers as requested.

**Discussion:**

Barriers to affordable housing are also barriers to fair housing in most instances. 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.

HTF funding will be used to provide additional housing for the underserved population of extremely low-income individuals. In addition, these funds will be utilized with the continued prioritization of geographic diversity.

## **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 processes and assists 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 analyses, 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.

HTF funding will be used to create more units for the underserved population of extremely low-income individuals.

#### **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 of low-income units by providing HOME and/or CDBG resources to fill gaps on the housing development side of a project, while using project-based Section 8 Housing Choice

Vouchers to create revenue after completion;

(2) using Veterans Administration Supportive Housing vouchers (VASH) to assist 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 HEARTH ACT services with Continua of Care and local jurisdictions to ensure that it funds projects and programs to meet the greatest homeless needs.

When State revenues are sufficient DOH may receive Housing Development Grant funds. When available, these State funds are the most flexible of the Division's resources, and allow tailored community solutions to help ensure that the poorest families in Colorado have an increasing supply of rental units affordable to them. DOH expects to receive \$9,200,000 in Housing Development Grant funds for the State Fiscal Year that runs from July 1, 2018 through June 30, 2019. Additional funding that is used for affordable housing has become available over the past few years, such as the Colorado Housing Investment Fund (CHIF), which originated with mortgage settlement funds. DOH receives CHIF funding as custodial funds through the Attorney General's office to be used for homeowner relief, foreclosure prevention, and affordable housing.

The primary housing assistance program is the Housing Choice Voucher program (HCV). These funds are used in the administration of both the Housing Choice Voucher and Shelter Plus Care programs through DOH.

DOH will continue to coordinate its funding efforts with those of the Colorado Housing and Finance Authority (CHFA) and other funding agencies often coordinate their efforts to make affordable housing projects successful.

HTF funding will be awarded to organizations that will develop and restore units for extremely low-income individuals. The priorities of this new funding source include new construction and rehabilitation of affordable housing.

### **Actions planned to reduce lead-based paint hazards**

DOH works closely with subgrantees, 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. Approximately 431,736 (+/-10%) homes in Colorado may contain lead based paint. DOH staff reviews each proposed housing project to ensure compliance 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 2015–2020 to ensure statewide compliance with applicable lead-based paint regulations.

#### **1. Enhance Existing Partnerships**

DOH will assist 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 support integration of the various services offered to lower-income households, including participation in current healthy home projects in the state. This includes the Colorado Healthy Homes Coalition (CHHC) that promotes the provision of comprehensive housing rehabilitation and household services to lower-income households. The CHHC works to maximize the interventions for each household in regard to their overall well-being by linking housing rehabilitation and weatherization services with medical care and hazard mitigation programs. DOH will continue to participate in the CHHC. DOH also supports the HUD Safe and Healthy Homes Investment Partnership certification program as a tool for program integration.

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 Colorado Department of Public Health and Environment'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**

### Employment:

The fundamental “antipoverty strategy” is a good job. 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.

HUD's formula grants to DOLA also contribute to creating and retaining jobs in Colorado, although that is not their primary purpose. The Divisions of Housing and Local Government are working to strengthen Section 3 performance in their use of federal funds to better create and retain jobs through their public facilities and housing projects.

### Housing and Supportive Services:

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 Division funds transitional and permanent supportive housing development for people with special needs as well as the homeless and chronically homeless. 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 use of new HTF funds will also be utilized to serve this population by creating more units for extremely low-income and homeless individuals and households.

### **Actions planned to develop institutional structure**

The Department of Local Affairs works with local governments, private industry, and nonprofit organizations to tackle issues involved in providing affordable housing, and community and economic

development. The primary gaps remaining in the institutional structure in Colorado are:

#### Governmental Coordination:

**Problem:** Gaps in communications can affect the decision-making of an entire region and lead to inefficient land use or excessive burden on one locale.

**Solution:** The Department of Local Affairs (DOLA) is the one agency in Colorado that deals almost exclusively with local governments on all levels of its mission. DOH continues to increase the coordination and involvement of State and Federal agencies, public and private nonprofits and others in the leveraging of funding sources, the planning and delivery of housing-related services, and the development of special initiatives to increase and preserve affordable housing. The State's "Interagency Housing Pipeline" is composed of key agencies that include the DOH, Colorado Housing and Finance Authority, U.S. Department of Housing and Urban Development and U.S. Department of Agriculture, Rural Development. These bi-monthly meetings provide coordination around multiple agency rules, various funding sources and an annual targeting of specific priority areas of the State in order to address immediate housing needs. Colorado also consults and collaborates with its CoCs.

#### Capacity of Local Nonprofit Organizations and Housing Authorities:

**Problem:** Many nonprofits lack not only the funding to meet their community's housing demands, but also the staff expertise to expand or diversify existing services.

**Solution:** DOLA works with the Department of Human Services and special-needs providers to encourage partnerships between service providers and housing development agencies. These alliances are essential to increasing the supply of affordable, accessible housing for persons with special needs.

DOLA works to improve agency capacity through technical assistance, workshops, training and monitoring. These efforts encourage retention of existing housing and new production of housing units

and the creation and expansion of projects and programs that meet community 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:

- Established a “Housing Initiatives” program to coordinate and collaborate with multiple agencies across additional program areas, including Veterans’ Housing, Renewable Energy, and other areas of interest.
- Intradepartmental CDBG Coordinating Group. DOLA created a cross-divisional work group to coordinate and integrate its use of CDBG funds.
- The Interagency Housing Pipeline which includes development staff from DOH, the Colorado Housing and Finance Authority (CHFA), the USDA Rural Development, US Department of Housing and Urban Development (HUD), and several Community Development Financial Institutions (CDFIs).
- Colorado and Community Interagency Council on Homelessness, a State coordinating organization appointed by the Governor to develop a strategic plan to end homelessness.
- Participates in Colorado’s three Continua of Care (CoC): Metropolitan Denver Homeless Initiative; Homeward Pikes Peak and the Balance of State.
- Housing Colorado, Inc., a 501(c)(3) membership organization that facilitates workshops, meetings and educational opportunities, as well as an annual conference for housing organizations and industry professionals.
- Colorado Chapter, National Association of Housing Redevelopment Organizations (NAHRO), a state trade association for housing authorities and redevelopment agencies.
- Colorado Foreclosure Task Force, a public-private task force in which the Division of Housing participates as an active member.
- Supportive Housing Program, a statewide housing authority whose oversight transferred to the Division of Housing as of July 1, 2011. DOH has established and will maintain Housing Advisory Housing Board.
- Examines linkages between HOME, CDBG and the HUD Section 8 Housing Choice Voucher Program. The purpose of the examination is to increase the supply of affordable housing for persons of limited income.
- DOH’s OHI will focus on homeless issues.
- Office of Homeless Youth Services, a program within the Division of Housing, will meet on a regular basis with statewide agencies to establish goals, objectives and to seek funding.

### **Discussion:**

Actions Planned to Affirmatively Further Fair Housing: DOH will continue to take opportunities to educate housing providers across the state on fair housing whenever possible. DOH will propose sessions at both the National Association of Housing and Redevelopment Officials Conference

and also with Housing Colorado Annual Conference. In addition, the Division has contracted with the Denver Metro Fair Housing Center to test for housing discrimination in the Disaster Recovery area and for discrimination against people with disabilities and people with children in the Denver Metro Area.

## Program Specific Requirements

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

#### Introduction:

#### 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	1,324,232
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
<b>Total Program Income:</b>	<b>1,324,232</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
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.	90.00%

#### 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 being 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, unless the applicant can demonstrate that they will be able to assist homebuyers with meeting resale requirements during the HOME affordability period. The state does not allow subrecipients to choose, but instead the state will favor recapture unless there is an ongoing relationship (e.g. or land trust model). Agencies must ensure ongoing compliance by using either a “Recapture” or “Resale” model. DOH and the agency must agree on which model to use before the program begins, and that choice must be reflected in the contract between DOH and the agency. Neither option prevents clients from selling their home, although Resale does restrict the sales price. Only DPA and For-Sale loans (not Rehab) have to be protected for the affordability period by a recorded “enforceable instrument.” Programs using the Resale model must use a Beneficiary and Use Covenant. Programs using the Recapture model may use a Beneficiary and Use Covenant, or they may instead incorporate it into their loan documents – but only if the client is not allowed to fully pay off the loan before the affordability period expires. The agency must incorporate the following agreements into their loan agreements (Deed of Trust, Promissory Note or other documents):

- Key terms of the mortgage note
- Length of the affordability period
- Principle residency is required of the client throughout the affordability period. If a client fails to use the home as a principle residence, the remaining balance of their loan becomes due and payable.
- Loan payoff does not end the affordability period, but selling the home or losing it to foreclosure does end it, and releases any use covenant.
- DOH recommends that the agency seek legal advice about incorporating these provisions into their loan documents.

Subrecipient resale/recapture provisions are the same. Subrecipients are expected to demonstrate how they are able to assist homebuyers in meeting the resale requirements during the time DOH and the agency agree on which model will be used before the program begins and be reflected in the contract. Following the detailed requirements in the RLF guidelines and application will outline their ability to meet resale requirements as detailed in the resale guidelines below. DOH staff provides on-going technical assistance to agencies to maximize the use of the new grant and program income funds used in revolving loan fund programs. DOH will monitor all agencies for compliance with these policies, as well as federal requirements, at least bi-annually. This review will include an evaluation of the agency’s performance in meeting service provision goals, and compliance with local lending guidelines. Any changes to the resale/recapture requirements will

include an amendment to the Annual Action Plan.

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 the HOME Investment and Create another Affordable Unit: 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 low income 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 more HOME-eligible activities. • Full Recapture, subject to net proceeds – the agency (or subgrantee) will recapture 100% of the funds if the client sells their home before the end of the affordability period, unless the client can demonstrate that the sale was an arms-length transaction and that net proceeds are not adequate to pay off 100% of the loan. • Net proceeds = Sales price – Senior debt repayment – Closing costs. Any excess net proceeds, after repayment of the DPA 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 of the Existing Property 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. • The sale of the property to the new low-income family 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 is defined as their down payment plus the value of any improvements they made to the house. For example, the homebuyer made a \$1,000 down payment to purchase an existing home. They also invested in a new kitchen that added \$5,000 to the value of the home. Their investment equals \$6,000. "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 subsequent (new) homebuyer's purchase. • For example, the median sales price for the home's unit type (single family vs. condo; existing vs. new construction) and market area, according to the local Multiple Listing Service, was \$200,000 when the homebuyer purchased it. When they decide to sell, the same measure of median sales price indicates an increase of 2.5% to \$205,000. The seller must be allowed to sell the home for enough to recoup both their original investment (\$6,000) and a 2.5% fair return on that investment ( $\$6,000 \times 2.5\% = \$150$ ), a total of \$6,150. • NOTE: if median sales prices actually decline between sales, the seller may not receive a return on their investment. AND ALSO, • The property must be sold at a price that is affordable to a household at 75% to 80% of area median income that will pay not more than 30% of their income for principal and interest. • If the affordable sales price is not enough to allow the seller to realize 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.

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:

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 unit, if the refinancing will reduce overall housing costs for the owner and make the housing more affordable. 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; or
- The required period of affordability will be a minimum of 30 years; or
- The State will accept applications for refinancing statewide; and, or
- 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.

DOLA-Division of Housing was approved by HUD to administer the 2016-17 ESG allocation on behalf of Adams County. These ESG funds help provide critical services for emergency shelter, homeless prevention, and rapid rehousing to Adams County residents as they work through times of crisis in



their lives.

Per language of 576.301(d)(1) and (2) the intent of the “geographical area” is intended to mean that the funds would first go to the Adams County jurisdiction without the entitlement areas (Thornton and Westminster). If DOH has any remaining funds from the first go round, then the funds could be advertised to Adams County including Thornton and Westminster and then if you have funds remaining after that then it could go the State geographical area.

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 three Continua of Care 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 permanent supportive housing resources. In the coming year, the continuum aims to incorporate homeless families and rapid rehousing resources as well.

The El Paso County Continuum of Care system serves veterans, but aims to incorporate chronically homeless individuals in the coming year. The Balance of State Continuum of Care has begun piloting coordinated entry through two pilot programs in at least six communities. The Balance of State is receiving technical assistance from HUD and the DOH. DOH is intricately involved in the strategy, planning and implementation of each continuum’s efforts.

The El Paso County Continuum of Care system serves veterans, but aims to incorporate chronically homeless individuals in the coming year. The Balance of State Continuum of Care has begun piloting coordinated entry through two pilot programs in at least six communities. The Balance of State is receiving technical assistance from HUD and the DOH. DOH is intricately involved in the strategy, planning and implementation of each continuum’s efforts.

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 will be submitted to the Division of Housing whose internal staff will screen applications for threshold criteria and forward eligible applications to a scoring committee. The Program Manager will present funding recommendations to the Division Director, DOLA’s Executive Director. DOLA’s Executive Director will make the final funding decision.

#### THRESHOLD CRITERIA

- 501(c)(3) status or unit of general local government
- Compliance with HMIS Participation
- Dollar for dollar match requirement

- Ability to meet certification of insurance requirement SCORING CRITERIA
- Years of experience in serving special needs population
- Staff capacity and track record for serving special needs population
- Staff capacity and track record
- Identify and document NEED for shelter and/or services
- Financial capacity
- Policies and procedures for assessing client needs
- Ability to conduct income determinations
- Ability to comply with grant requirements

#### SCORING CRITERIA

- Years of experience in serving special needs population
  - Staff capacity and track record for serving special needs population
  - Staff capacity and track record
  - Identify and document NEED for shelter and/or services
  - Financial capacity
  - Policies and procedures for assessing client needs
  - Ability to conduct income determinations
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.

The ESG application scoring committee includes a homeless or formerly homeless individual among its seven members.

5. Describe performance standards for evaluating ESG.

Currently, the Division of Housing is relying on quarterly esnaps reports that capture unduplicated numbers of persons or households served as well as onsite monitoring performed by DOH staff members. In partnership with the Continua of Care, new written performance standards will be developed using the Consolidated plan, quarterly enaps 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:
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".

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.

Demonstrate need by:

1. Third party market study
2. Local housing needs assessment and strategic plan
3. Local government supporting documentation substantiating the need and expressing support for the proposal

Administrative Capacity:

1. No unresolved financial audit findings
2. Compliance plan to ensure that Federal and State regulations and reporting requirements will be met, including but not limited to
  - a) Federal Labor and Construction Standards, including Davis Bacon Wages
  - b) Section 3 and MBE/WBE
  - c) Fair Housing and Civil Rights, including Section 504
  - d) Residential Antidisplacement and Relocation
  - e) State or Federal procurement requirements
  - f) Lead Based Paint and other environmental hazards
3. Property Management Experience
  - a) Property Management plan that ensures rent and affordability compliance
  - b) Tax Credit compliance
4. Applicant Monitoring Record
  - a) Monitoring finding resolution for on-site visits

b) Problems with periodic compliance reports are resolved

5. Applicant reporting and pay requests are timely and accurate

a) Applicant is current with all DOH required reporting

b) Pay requests must be timely, accurate, and current before processing a new grant or loan

6. Previous project experience not required although additional information will be required.

#### Completed Application

1. Legal notice published and public hearing requirements met

2. Documents signed

3. Required documents submitted

4. Complete project budget

#### Project Readiness to Proceed

1. Site control

2. Third party capital needs assessment completed within the past 12 months and covering a period of no fewer than 15 years for rehabilitation projects

3. Scope of work for rehabilitation projects

4. Confirmed local political support

5. Local financial support

6. Expected planning and zoning approval within 90 days of State Housing Board approval

7. 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

8. Construction and/or acquisition start date

9. Construction cost estimate

10. Relocation and/or replacement housing required relocation plan and budget submitted

#### Energy Performance Standards

Project Affordability Period. Rental Housing. The DOH affordability term will run concurrently with the HUD required term of affordability.

1. The minimum affordability term for new construction is 30 years

2. The minimum affordability term for acquisition with or without rehabilitation is 30 years

3. 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

MANAGEMENT CAPACITY. 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 percent of the HTF funds will benefit extremely-low income households.

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.

Three (3) separate DOH staff reviews are completed prior to the presentation of an application to the State Housing Board for 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:

1) 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 the Homeless." 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.

2) 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 "Additional Affordable Housing" and "Acquire and Preserve Affordable Housing Stock."

Additionally, applications that meet Colorado's threshold requirements will be receive priority for HTF funding as described in the following sections VI.3.d. through VI.3.i.

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".

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

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 the Homeless." 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 fifth 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 in VI. 3.c. and f., 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 the Homeless."

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 fourth 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".

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".

**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.



## **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.

Colorado performed an analysis of the cost to replace a unit with the higher of 60% AMI rent or FMR with a unit with 30% AMI rent in various locations across the State. In no area of the State did this cost exceed the HOME maximum per-unit subsidy amount. Colorado has adopted the HOME maximum per-unit subsidies as its HTF maximum per-unit subsidies.

The 2018 maximum per-unit subsidies are as follows:

Max Subsidy 0 bedroom: \$144,050

Max Subsidy 1 bedroom: \$165,134

Max Subsidy 2 bedroom: \$200,801

Max Subsidy 3 bedroom: \$259,744

Max Subsidy 4 bedroom: \$285,149

**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.

ESG Policies - Page 1 of 13 Pages

### **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 reimbursable. 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.

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#### **Additional standards for Street Outreach:**

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

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#### **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.

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#### **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.

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#### § 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. ).

**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; and Capital Needs Assessments (if applicable).

See Attached





**COLORADO**

**Department of Local Affairs**

Division of Housing

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## **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

<b>Contaminants [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
N/A	
<b>Replacement Standard</b>	
<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"> <li>• All paints and primers should meet the most recent Green Seal G-11 Environmental Standard. <a href="http://www.greenseal.org/Home.aspx">http://www.greenseal.org/Home.aspx</a></li> <li>• 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.</li> </ul>	

<b>Lead-Based Paint (LBP) [GREEN STANDARD]</b>	
<b>Repair Standard ("Interim Controls")</b>	
<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: <a href="http://www.hud.gov/offices/lead/lbp/hudguidelines/">http://www.hud.gov/offices/lead/lbp/hudguidelines/</a></p> <p>All interim controls shall be performed as follows and by properly trained workers:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Occupants may be temporarily relocated as required by the regulations.</li> <li>• All surfaces coated with LBP shall be properly maintained over the life of the program covenants.</li> <li>• 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.</li> </ul>	
<b>Replacement Standard ("Abatement")</b>	
<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 <a href="#">National Radon Proficiency Program</a>." Individuals can also get coupons for mail-order test kits on the Colorado Dept. of Public Health and Environment's website: <a href="http://www.colorado.gov/cs/Satellite/CDPHE-HM/CBON/1251617274212">http://www.colorado.gov/cs/Satellite/CDPHE-HM/CBON/1251617274212</a></p>	
<b>Replacement Standard</b>	
<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: <a href="http://www.epa.gov/radon/pubs/consguid.html">http://www.epa.gov/radon/pubs/consguid.html</a>.</p> <p>If the home's water comes from a private well, the water should also be tested. Water testing is available from the <a href="#">Colorado Department of Public Health and Environment's Laboratory Services Division</a>.</p>	

<b>Mold [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
<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>	
<b>Replacement Standard</b>	
<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:  <a href="http://www.nchh.org/Portals/0/Contents/FloodCleanupGuide_screen_.pdf">http://www.nchh.org/Portals/0/Contents/FloodCleanupGuide_screen_.pdf</a></p>	

<b>Fire Safety - Egress</b>	
<b>Repair Standard</b>	
N/A	
<b>Replacement Standard</b>	
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.	

<b>Fire and CO Alarms [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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

<b>Drainage [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
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: <a href="http://www.denverwater.org/Conservation/Xeriscape/">http://www.denverwater.org/Conservation/Xeriscape/</a>	
<b>Replacement Standard</b>	N/A
N/A	

<b>Outbuildings</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	N/A
DOH rehabilitation funds may not be used to replace outbuildings.	

<b>Fencing and Gates</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
DOH rehabilitation funds may not be used to replace fencing.	

<b>Paving And Walks</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
Un-repairable essential walks and driveways shall be replaced with permeable paving, if financially feasible <b>[GREEN STANDARD]</b> , 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.	

<b>Trees and Shrubbery</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard [GREEN STANDARD]</b>	
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, sidewalls, 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.	

<b>Lawn [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
Bare section of lawn may be reseeded with drought-resistant grasses or plantings. For more information, see Denver Water's website at: <a href="http://www.denverwater.org/Conservation/Xeriscape/">http://www.denverwater.org/Conservation/Xeriscape/</a>	
<b>Replacement Standard</b>	
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.

<b>Exterior Cladding [MAJOR SYSTEM] [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
Buildings may have siding replaced with wood, vinyl or cementitious siding to match the existing configuration. New wood components shall be FSC certified: <a href="http://www.fsc.org/">http://www.fsc.org/</a> . All new surfaces that will receive paint shall be primed prior to painting.	

<b>Exterior Porches</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.	



<b>Exterior/Interior Railings</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.	

<b>Exterior Decks and Exterior/Interior Steps</b>	
<b>Repair Standard</b>	
Steps, stairways, and porch decks shall be structurally sound, reasonably level, with smooth and even surfaces. Repairs shall match existing materials.	
<b>Replacement Standard</b>	
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

<b>Firewalls <span style="color: red;">[MAJOR SYSTEM]</span></b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.	

<b>Foundations [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
Foundation replacements shall be completed to meet local codes (or IEBC).	

<b>Structural Walls [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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

<b>Interior Doors</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
Hollow-core, pressed-wood product consistent with the style of existing doors including latch-sets. Baths and occupied bedrooms shall have lock sets.	

<b>Exterior Doors [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	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.
<b>Replacement Standard</b>	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.

<b>Windows [MAJOR SYSTEM] [GREEN STANDARD]</b>	
<b>Repair Standard</b>	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.
<b>Replacement Standard</b>	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: <a href="http://www.energystar.gov/index.cfm?c=windows_doors.pr_anat_window">http://www.energystar.gov/index.cfm?c=windows_doors.pr_anat_window</a> 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.



<b>Basement Windows and Ventilation [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
If feasible, two basement windows on opposite sides of the building should be operable for ventilation, in good working order, and lockable.	
<b>Replacement Standard</b>	
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

<b>Flat and Low-Slope Roofing [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
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 alligatoring 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.	
<b>Replacement Standard</b>	
The most cost-effective roof shall be installed to the manufacturer’s specifications and in accordance with local codes (or IEBC).	

<b>Pitched Roofs [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
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.	

<b>Replacement Standard</b>	
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).	

<b>Gutters and Downspouts [MAJOR SYSTEM] [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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

<b>Infiltration [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
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).	
<b>Replacement Standard</b>	
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).	

<b>Insulation [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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: <a href="http://www.energystar.gov/ia/partners/bldrs_lenders_raters/downloads/Thermal_Bypass_Inspection_Checklist.pdf">http://www.energystar.gov/ia/partners/bldrs_lenders_raters/downloads/Thermal_Bypass_Inspection_Checklist.pdf</a>	

<b>Bath Ventilation [MAJOR SYSTEM] [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
All bathroom ventilation shall meet the local building code (or IEBC) for bath ventilation that was in effect at the time of their construction.	
<b>Replacement Standard</b>	
All bathrooms shall be mechanically vented to the $\geq 80$ CFM creating $\leq 0.3$ 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).	

<b>Kitchen Ventilation [MAJOR SYSTEM] [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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).	

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

## 8 - Interior Standards

<b>Interior Walls and Ceilings</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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).	

<b>Flooring</b>	
<b>Repair Standard</b>	
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>	
<b>Replacement Standard</b>	
<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: <a href="http://www.carpet-rug.org/residential-customers/selecting-the-right-carpet-or-rug/green-label.cfm">http://www.carpet-rug.org/residential-customers/selecting-the-right-carpet-or-rug/green-label.cfm</a></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>	

<b>Closets</b>	
<b>Repair Standard</b>	
Existing closets shall be maintained in good repair and have a shelf and clothes rod.	
<b>Replacement Standard</b>	
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.	

<b>Cabinets and Countertop</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.	

<b>Appliances</b>	
<b>Repair Standard</b>	
All appliances in units shall be in proper working order and in clean and sanitary condition.	

<b>Replacement Standard</b>	
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).

<b>Lighting</b>	
<b>Repair Standard</b>	
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.	
<b>[GREEN STANDARD]</b> Existing fixtures with incandescent lamp fittings shall have CFL replacement lamps installed.	

<b>Replacement Standard</b>	
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.	

<b>Interior Electric Distribution [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
If wall finishes are removed, those areas shall be wired to the latest version of local codes (or State Electrical Code).	

<b>Service and Panel [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.

<b>Drain, Waste, Vent Lines [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
If walls are removed exposing vent and waste lines, those lines shall be reworked or replaced to the current mechanical code.	

<b>Plumbing Fixtures</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.	
<b>[GREEN STANDARD]</b> 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.	



<b>Plumbing Minimum Equipment [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
All existing equipment shall be operational and leak free.	
<b>Minimum Standard</b>	
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.	

<b>Water Heaters [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
Hot water systems that are replaced shall be of adequate capacity, be installed per manufacturer's specifications and meet local codes (or IEBC).	
<b>[GREEN STANDARD]</b> High efficiency power-vented or sealed combustion tankless models are allowed.	

<b>Water Supply [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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

<b>Air Conditioning [MAJOR SYSTEM] [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.	

<b>Chimney [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
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.	

<b>Replacement Standard</b>	
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.	

<b>Distribution System (MAJOR SYSTEM)</b>	
<b>Repair Standard</b>	
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.	
<b>[GREEN STANDARD]</b> 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.	
<b>Replacement Standard</b>	
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.	

<b>Heating (MAJOR SYSTEM)</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
Gas-fired heating plants shall be rated at $\geq 92\%$ AFUE or better, to the extent possible. Heat pumps shall be rated at $\geq 15$ 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).	

<b>Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation</b>		
<b>NOTE:</b> Observable Deficiencies in <i>* Bold Italic</i> are considered life-threatening and must be addressed immediately, if the housing is occupied.		
<b>Inspectable Item</b>	<b>Observable Deficiency</b>	<b>Type and Degree of Deficiency that must be addressed</b>
<b>Requirements for Site</b>		
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
	<i>*Air Quality - Propane/Natural Gas/Methane Gas Detected</i>	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
	<i>*Electrical Hazards - Exposed Wires/Open Panels</i>	Exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	<i>*Electrical Hazards - Water Leaks on/near Electrical Equipment</i>	Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	<i>*Flammable Materials - Improperly Stored</i>	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



Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation		
<b>NOTE:</b> 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
<b>Requirements for Building Exterior</b>		
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
	<b>*Blocked Egress/Ladders</b>	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	<b>*Electrical Hazards - Exposed Wires/Open Panels</b>	Exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	<b>*Electrical Hazards - Water Leaks on/near Electrical Equipment</b>	Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	<b>*Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable</b>	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
	<b>*Emergency Fire Exits - Missing Exit Signs</b>	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	<b>*Flammable/Combustible Materials - Improperly Stored</b>	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
Lighting	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
	Broken Fixtures/Bulbs	Lighting fixtures and bulbs are broken or missing
Roofs	Soffits or Fascia	Soffits or fascia that should be there are missing or so damaged that water penetration is visibly possible
	Damaged Soffits/Fascia	
	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
Walls	Ponding	Evidence of standing water on roof, causing potential or visible damage to roof surface or underlying materials
	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

<b>Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation</b>		
<b>NOTE:</b> Observable Deficiencies in <i>* Bold Italic</i> are considered life-threatening and must be addressed immediately, if the housing is occupied.		
<b>Inspectable Item</b>	<b>Observable Deficiency</b>	<b>Type and Degree of Deficiency that must be addressed</b>
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
	<b>*Security Bars Prevent Egress</b>	The ability to exit through egress window is limited by security bars that do not function properly and, therefore, pose safety risks
<b>Requirements for Building Systems</b>		
<b>Inspectable Item</b>	<b>Observable Deficiency</b>	<b>Type and Degree of Deficiency that must be addressed</b>
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
	<b>*Missing Outlet Covers</b>	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
	<b>*Missing/Damaged/Expired Extinguishers</b>	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
	<b>*Air Quality - Propane/Natural Gas/Methane Gas Detected</b>	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
	<b>Electrical Hazards - Exposed Wires/Open Panels</b>	Exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	<b>*Electrical Hazards - Water Leaks on/near Electrical Equipment</b>	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
	<b>*Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable</b>	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
	<b>*Emergency Fire Exits - Missing Exit Signs</b>	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	<b>*Flammable Materials - Improperly Stored</b>	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
	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
HVAC	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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Inspectable Item	Observable Deficiency	Type and Degree of Deficiency that must be addressed
	<b>*Misaligned Chimney/Ventilation System</b>	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
<b>Requirements for Common Areas</b>		
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	Any door that does not function as it should or cannot be locked because of damage to the door's hardware
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
	<b>*Electrical - Missing Covers</b>	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
	<b>*HVAC - Misaligned Chimney/Ventilation System</b>	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

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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
	<b>*Outlets/Switches/Cover Plates - Missing/Broken</b>	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
	<b>*Smoke Detector - Missing/Inoperable</b>	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
	<b>*Windows - Security Bars Prevent Egress</b>	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
	<b>*Air Quality - Propane/Natural Gas/Methane Gas Detected</b>	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
	<b>*Electrical Hazards - Exposed Wires/Open Panels</b>	Exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	<b>*Electrical Hazards - Water Leaks on/near Electrical Equipment</b>	Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	<b>*Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable</b>	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
	<b>*Emergency Fire Exits - Missing Exit Signs</b>	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	<b>*Flammable/Combustible Materials - Improperly Stored</b>	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



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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
	<i>*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
	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

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Inspectable Item	Observable Deficiency	Type and Degree of Deficiency that must be addressed
	<b>*Air Quality - Propane/Natural Gas/Methane Gas Detected</b>	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
	<b>*Electrical Hazards - Exposed Wires/Open Panels</b>	Exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	<b>*Electrical Hazards - Water Leaks on/near Electrical Equipment</b>	Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	<b>*Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable</b>	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
	<b>*Emergency Fire Exits - Missing Exit Signs</b>	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	<b>*Flammable Materials - Improperly Stored</b>	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
	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
	Infestation - Rats/Mice/Vermin	Evidence of rats or mice--sightings, rat or mouse holes, or droppings
Hot Water Heater	<b>*Misaligned Chimney/Ventilation System</b>	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
	<b>*Missing/Broken Cover Plates</b>	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	<b>*Missing/Inoperable</b>	Smoke detector is missing or does not function as it should
Stairs	Broken/Damaged/Missing Steps	A step is missing or broken

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<b>Inspectable Item</b>	<b>Observable Deficiency</b>	<b>Type and Degree of Deficiency that must be addressed</b>
	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
	<b><i>*Security Bars Prevent Egress</i></b>	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.

The State will limit beneficiaries and/or give preferences to the following segments of the extremely low-income population:

- People with disabilities or other special needs (e.g. individuals/families exiting homelessness)

The groups listed have also been identified in the action plan in AP 25-Allocation Priorities.

**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

**Discussion:**

"Housing Opportunities for Persons with AIDS (HOPWA)"

The State's method of selecting a sponsor is based on the sponsor's ability to provide comprehensive services to persons with HIV/AIDS statewide. Colorado Health Network (CHN) (dba Colorado AIDS Project) is a statewide entity with over three decades of providing a multitude of services to individuals with an HIV/AIDS diagnosis. Division of Housing selected CHN to be the grantee because of their specialization of services to persons with HIV/AIDS and because of their long standing success in service delivery.

HOPWA funding will help clients access housing, related supportive services and tenant based rental assistance. Funds will enable low-income Coloradans living with HIV/AIDS and their families to achieve housing stability, improved access to healthcare and medication, and reduce the risk of future homelessness.

The 2017-2018 goal is to assist 65 households with both rental assistance and supportive services. The State will retain 3% of its HOPWA grant for administration, the remainder will be granted to CHN which will use 7% for Admin and the remaining funds for rental assistance and supportive services.

DOLA has been working to improve the IDIS process for tracking program income held at the local level. We will create projects and activities to that better reflect PI and RL draws and receipts at an activity level. These changes should also provide HUD with a better indication of PI and RL held at the local level, and the overall activity of revolving loan funds throughout the state. Furthermore, as indicated in the methods of distribution, we plan to recapture funds held at the local level with inactive programs in order to redistribute those funds in a way that better serves those communities.

## Attachments



## Citizen Participation Comments

### 2017-2018 Annual Action Plan Public Comments

- **Written comments received via email:**

- “Colorado should expend more effort and allocate more resources, than it does now, on preservation of affordable housing versus new construction, because preservation is more cost-effective than new construction. The logic that new units need to be added while preserving existing units, while true, misses the point of preservation being more cost effective, because it does not account for the units of NOAH (naturally occurring affordable housing) that are lost to market rate ‘value-add developers’. For Colorado, the federal and state dollars spent on the sum total of preserved and new construction subsidized affordable units unfortunately is far less than the # of NOAH’s lost to market-rate developers – so that in the end, we lose more affordable units than we preserve or build new. Since converting a NOAH into subsidized affordable housing is more cost-effective than building a new structure, and if we consider preserving or converting a NOAH unit as ‘adding’ a new unit into the subsidized affordable bucket, then the strategy of preserving NOAHs is much cheaper than ‘adding’ a new unit with new construction. Also, if we were to add the cost of utility subsidy (Utility allowances) into the cost of the overall subsidized affordable housing, then making a property green i.e. energy and water efficient, is even more cost-effective than preservation. But currently there is no requirements or incentives (federal or state) offered to existing subsidized affordable housing to be efficient. Again, in order to maximize the cost-effectiveness of the federal or state subsidies, DOH should consider a strategy on how making subsidized affordable housing more efficient, can reduce the need for subsidies and thus make housing more affordable.”

- Staff accepts this comment, and will continue to consider this information throughout the year in order to address these concerns.

- “1. Thank you for noting Colorado has a shortfall of over 100,000 rental units for households earning under \$20,000 years.(p 114-115). We agree that the “primary goal of using Housing trust fund is to create units for extremely low-income individuals through Colorado”, using this \$3 million as a first step in filling the large gap.

While housing is becoming increasingly unaffordable to many in Colorado, those with the lowest income face the most severe shortages. For every 100 renters who are extremely low income (earning less than 30% of Area Median Income), there are only 27 housing units affordable at 30% or less of their income (National Low Income Housing Coalition tabulation of 2015 ACS PUMS data).

2. Include manufactured housing as part of the solution to the need for affordable housing. Work with partners to protect existing land-lease communities and encourage local zoning practices which include manufactured housing in the mix of available local housing stock. Promote resident ownership and education through technical assistance

In the 2017-2018 plan, there is no mention of promoting and preserving manufacture homes- one of the most affordable forms of housing. Currently, 4% of housing stock in Colorado is manufactured homes.

3. Describe/create the relationship between housing programs and the Workforce Innovation and Opportunity Act (WIOA) or workforce centers. "Employment" and the need for employment was mentioned four times. Many other government programs and agencies were mentioned by name. And under WIOA, workforce centers are supposed to prioritize for services those who have barriers to employment, specifically naming homelessness individuals (WIOA Sec. 3 Def 24 (G)). Yet the WIOA state plan did not mention the Continuum of Care or HEARTH Act and likewise this plan does not mention WIOA or workforce centers. To make better use of state resources to serve our residents, state agencies should build in links between silos."

- Staff accepts these comments and is working on how to best address manufactured homes throughout the state. Furthermore, staff would like more information on how to best coordinate efforts with WIOA.

- **Verbal comments provided during the public meeting:**

- Supportive services are difficult to fund. Look into the First Bank Federal Home Loan and deferred developer's fees. There needs to be a better way of funding supportive services for supportive housing projects.
  - Staff accepts this comment and will consider this during the planning process for the new Homeless Solutions Program (HSP) funds.
- Regarding HTF, can there be fewer restrictions on the use of the funds?
  - Staff accepts this comment, and has explained that the HTF Allocation Plan provides preferences, but does not add specific restrictions, and encouraged meeting members to speak to us regarding projects they have in mind for this funding source.
- Regarding the new state Homeless Solutions Program (HSP) funds, a member of the public stated that she would like to see these resources partially dedicated to individuals



exiting jails and prisons, especially those with felonies on their background checks, to get them vouchers and help them find housing.

- Staff accepts this comment, and has explained that we are still in the planning process for these state funds, but that this is currently part of the plan to address these needs.
- One member of the public requested better access to funds for rural areas in the state. There was a discussion regarding how DOLA could improve the application process and make it easier for grantees to apply.
  - Staff accepts this comment, and has explained that we are working on improving our application process to make it easier for applicants to apply, with the goal of trying to make it more accessible online. We will continue to move forward with making improvements.



*Housing Trust Fund  
Allocation Plan Guide  
2017*



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## I. GENERAL INFORMATION

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### HTF Allocation Plan

The Housing Trust Fund (HTF) Interim Rule (24 CFR Part 93) made the consolidated plan regulations at 24 CFR Part 91 applicable to the HTF. As a result, an HTF grantee (i.e., a State) must include HTF in its citizen participation plan (§ 91.115), strategic plan (§ 91.315), and annual action plan (§ 91.320). In addition, the State must submit to HUD for review and approval an HTF allocation plan with its annual action plan (§ 91.320(k)(5)). Also, as required in § 91.10, the HTF program must be administered by the State on the same program year it established for all grant programs covered by the consolidated plan.

The HTF allocation plan is an annual submission to HUD that describes how the State will distribute the HTF funds, including how it will use the funds to address its priority housing needs. The allocation plan also describes what activities may be undertaken with HTF funds and how recipients and projects will be selected.

### Submission Requirement

HUD Notice CPD 12-009 requires a State submitting a consolidated plan on or after November 15, 2012 to use the eCon Planning Suite in IDIS to submit this plan and all subsequent consolidated plans, annual action plans, and consolidated annual performance and evaluations reports (CAPERs). However, the eCon Planning Suite does not currently contain the data fields to accommodate the HTF allocation plan. As a result, HUD developed this guide to assist the State in submitting the HTF allocation plan. **The State may opt to use this sample form or to submit its allocation plan in a different format, provided that all required elements are addressed.** Please visit the HTF website, [www.hudexchange.info/htf](http://www.hudexchange.info/htf) for more guidance on the HTF program and HUD Notice CPD 17-05 *Guidance for HTF Grantees on Fiscal Year 2017 Housing Trust Fund (HTF) Allocation Plans* for more information on HTF allocation plans. This guide also contains a list of HTF and eCon Planning Suite resources that the State should reference before developing and submitting its HTF allocation plan. The State should also consult the *Con Plan Quick Guide: Amending a Consolidated Plan and Action Plan* for assistance on amending its consolidated plan and action plan.

### Deadline

The State must submit an HTF allocation plan and make any amendments to its consolidated plan no later than **August 16, 2017**. **Please note that if the State submitted a new 5-year consolidated plan for FY 2016 funding or amended its approved consolidated plan to include HTF for FY 2016 funding, the State may not need to make changes to its approved consolidated plan for FY 2017.** For 2017, the HTF allocation plan must be submitted to both the local HUD CPD Field Office and to HUD's Office of Affordable Housing Programs at [htf@hud.gov](mailto:htf@hud.gov).

**Review Period**

The 45-day review period begins when (a) HUD receives the Standard Form 424 and certifications or email notification that the consolidated plan has been submitted in IDIS (for new action plans) or (b) HUD receives the Standard Form 424 and certifications or email notification that an amended action plan has been submitted in IDIS.

**Approval Process**

The HTF allocation plan will be deemed approved 45 days after HUD receives the plan, unless HUD notifies the State that the plan is disapproved before expiration of the review period. Please note, if a State intends to use HTF funds to assist first-time homebuyers, it must set forth the guidelines for resale and recapture, and obtain HUD's specific, written approval, as required in § 93.304(f), separate and apart from the approval of the HTF allocation plan.

**Need Assistance?**

For assistance with the HTF allocation plan, the State should contact the local HUD CPD Field Office and/or send its question(s) to the HTF mailbox at [htf@hud.gov](mailto:htf@hud.gov). For assistance with the eCon Planning Suite in IDIS, the State should contact Ask A Question on the HUD Exchange website at <https://www.hudexchange.info/get-assistance/my-question/>.

## II. GRANTEE INFORMATION

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<b>State:</b>	<b>FY 2017 HTF Allocation Amount:</b>
Colorado	\$3,154,331

## III. CONSOLIDATED PLAN REQUIREMENTS

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### Citizen Participation Plan

The consolidated plan regulation at § 91.115 requires the State to include HTF in its citizen participation plan. Essentially, before adopting a consolidated plan, the State is required to adopt a citizen participation plan that describes the process for providing and encouraging citizens to participate in the development of the consolidated plan, the amendments to the consolidated plan and the performance report (CAPERS). For the purposes of HTF, the State is required to make the following information available to the public:

- the amount of HTF assistance the State expects to receive,
- the range of activities the State may undertake, including the estimated amount that will benefit extremely low-income households, and
- the State's plans to minimize displacement of persons and to assist any persons displaced.

If the State already conducted its citizen participation and included HTF in any citizen participation it performed for the other HUD formula grant programs, then the State does not need to conduct additional citizen participation for HTF. If the State has not yet conducted citizen participation or did not include HTF in the citizen participation it performed for other HUD formula grant programs, then it must conduct citizen participation to include HTF as part of its consolidated plan.

### Consolidated Plan Screen(s) To Revise

The following screen in the eCon Planning Suite consolidated plan template in IDIS must be revised to include HTF.

- ES-05 / AP-05 Executive Summary:** § 91.320(b)- The Executive Summary includes seven narratives: (1) Introduction; (2) Summary of Objectives and Outcomes; (3) Evaluation of Past Performance; (4) Summary of the Citizen Participation and Consultation Process; (5) Summary of Public Comments; (6) Summary of Comments Not Accepted; (7) Summary.



- PR-15 Citizen Participation:** § 91.115 and § 91.300(c)- revise this screen to provide a summary of the citizen participation efforts made for HTF, including efforts to broaden public participation, a summary of citizen comments or views on the plan, and a written explanation of comments not accepted and the reasons why these comments were not accepted.

#### **IV. STRATEGIC PLAN REQUIREMENTS**

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The State must amend the affordable housing section of the strategic plan to include specific objectives that describe proposed accomplishments the State hopes to achieve and must specify the number of extremely low-income families to which the State will provide affordable housing to (homeownership- § 93.302; rental- § 93.304) over a specific period of time. The State can complete this requirement by including HTF on the **SP-45 Goals screen**.

**Note: Directions on how to amend a plan are included at the end of this document.**

**Reminder:** 100 percent of FY 2017 HTF funds must benefit extremely low-income households; a minimum of 80 percent must be used for rental housing; up to 10 percent may be used for homeownership housing; up to 10 percent may be used for administrative costs.

#### **Strategic Plan Screen(s) To Revise**

In addition to updating the affordable housing section of the strategic plan, the following screens in the eCon Planning Suite consolidated plan template in IDIS must be revised to include HTF.

- SP-10 Geographic Priorities:** § 91.315(a)(1)- revise this screen to discuss how investments are allocated geographically.
- SP-25 Priority Needs:** § 91.315(a)(2)- revise this screen to indicate the general priorities for allocating investment of available resources among different needs.
- SP-30 Influence of Market Conditions:** § 93.315(b)- revise this screen to describe how the characteristics of the housing market influenced the State's decisions regarding allocation priorities among the types of housing assistance.
- SP-35 Anticipated Resources:** § 91.315(a)(4); § 91.320(c)(1) and (2)- revise this screen to identify the federal, state, local, and private resources expected to be available to the State to address priority needs and specific objectives identified in the strategic plan. Specifically, the State should add a program to this screen by selecting "Add" in the *Action* column. This will open the **SP-36 Add Anticipated Resource** screen. The State should select "Other" in the *Anticipated Resource* field and enter "Housing Trust



Fund" in the *Other Funding Source* field. The State should also select the "public - federal" radio button in the "Source" field and complete the rest of the fields on this screen for its HTF program.

- SP-45 Goals:** § 91.315(a)(4) and § 91.315 (b)(2)- revise this screen to summarize the State's priorities and the specific goals it intends to initiate and/or complete within the term of the strategic plan. The State must also ensure its five year goals include any accomplishments due to HTF funds and must also enter the number of extremely low-income families to which the State will provide assistance with its HTF funds.

## **V. ANNUAL ACTION PLAN REQUIREMENTS**

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The State must include HTF in its annual action plan or amend the plan to include HTF information as required in § 93.320(k)(5). The action plan must include an HTF allocation plan that describes the distribution of HTF funds, and establishes the application requirements and selection criteria of applications submitted by eligible recipients that meet the State's priority housing needs.

### **Annual Action Plan Screen(s) To Revise**

The following screens in the eCon Planning Suite consolidated plan template in IDIS must be revised to include HTF.

- AP-15 Expected Resources:** § 91.320(c)(1) and (2)- revise this screen to provide a concise summary of the federal resources expected to be available. The HTF resources added to the **SP-35 Anticipated Resources** screen will carry over to this screen.
- AP-20 Annual Goals and Objectives:** § 91.320(c)(3) and (e)- revise this screen to summarize the specific goals the State intends to initiate and/or complete within the term of the program year. Any HTF related goals and objectives entered on the **SP-45 Goals** screen will carry over to this screen.
- AP-25 Allocation Priorities:** § 91.320(d)- revise this screen to describe the reasons for the State's allocation priorities and how the proposed distribution of funds will address the priority needs and goals of the strategic plan.
- AP-30 Method of Distribution:** § 91.320(d) and (k5)- revise this screen to include a description of its method(s) for distribution for the "Other – Housing Trust Fund" selection based on the entry made on the **SP-35 Anticipated Resources** screen.
- AP-35 Projects:** § 91.220(d)- revise this screen to include consolidated plan/annual action plan projects that reflect the planned use of HTF funds each year.

- ☑ **AP-50 Geographic Distribution:** § 91.320(f)- revise this screen to describe the geographic areas of the state in which it will direct assistance during the ensuing program year and provide rationale for its priorities in allocating investment geographically.
- ☑ **AP-55 Affordable Housing:** § 91.320(g)- revise this screen to specify goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing within the program year.
- ☑ **AP-65 Homeless and Other Special Needs Activities:** § 91.320(h)- revise this screen to describe how HTF will help to address the State's one-year goals and actions for reducing and ending homelessness, if applicable.
- ☑ **AP-75 Barriers to Affordable Housing:** § 91.320(i)- revise this screen to describe how HTF will help with any actions the State's will take during the next year to reduce barriers to affordable housing, if applicable.
- ☑ **AP-85 Other Actions:** § 91.320(j)- revise this screen to describe how HTF will help with any actions the State will take during the next year to carry out the following strategies outlined in the consolidated plan:
  - Foster and maintain affordable housing;
  - Evaluate and reduce lead-based paint hazards;
  - Reduce the number of poverty-level families;
  - Develop institutional structure; and
  - Enhance coordination.

In addition, the State must identify obstacles to meeting underserved needs and propose actions to overcome those obstacles using HTF funds, if applicable.

## VI. ALLOCATION PLAN REQUIREMENTS

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The State is responsible for distributing HTF funds throughout the State according to its housing priority needs. In addition to revising the **AP- 30 Method of Distribution** screen in IDIS, the State must respond to the following questions.

### Distribution of HTF funds

1. How will the State distribute its HTF funds (§ 91.320(k)(5))? Select all that apply:

- Applications submitted by eligible recipients
- Subgrantees that are State Agencies
- Subgrantees that are HUD-CPD entitlement grantees

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".

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 State'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 THRESHOLDS.** 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. For instance, DOH may waive the "Local Financial Support" criterion under "Project Readiness to Proceed" for some projects--particularly in rural areas--where local agencies lack the resources to provide financial support to the project.

Demonstrate need by means of:

1. Third party market study (not required for rehab-only applications for fully occupied properties unless post-rehab rent increases are proposed), and
2. Local housing needs assessment and strategic plan (if available), and
3. Local government supporting documentation substantiating the need and expressing support for the proposal.

Administrative Capacity. Adequate overall management capability as demonstrated by:

1. No unresolved financial audit findings.
2. Compliance plan to ensure that Federal and State regulations and reporting requirements will be met, including but not limited to:
  - a) Federal Labor and Construction Standards, including Davis Bacon Wages, as applicable.
  - b) Section 3 and MBE/WBE, as applicable.
  - c) Fair Housing and Civil Rights, including Section 504, as applicable.
  - d) Residential Antidisplacement and Relocation, as applicable.
  - e) State or Federal procurement requirements, as applicable
  - f) Lead Based Paint and other environmental hazards, as applicable.
3. Property Management Experience
  - a) Property Management plan that ensures rent and affordability compliance.
  - b) Tax Credit compliance, as applicable.

- c. Describe the selection criteria that the State 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 percent of the HTF funds will benefit extremely-low income households.

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.

Three (3) separate DOH staff reviews are completed prior to the presentation of an application to the State Housing Board for 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:

1) 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 the Homeless." 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.

2) 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 "Additional Affordable Housing" and "Acquire and Preserve Affordable Housing Stock."

Additionally, applications that meet Colorado's threshold requirements will be receive priority for HTF funding as described in the following sections VI.3.d. through VI.3.i.

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

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

- e. Describe the State'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 State'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 the Homeless." 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 State'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 fifth funding priority.

- h. Describe the State's required priority for funding based on the merits of the application in meeting the priority housing needs of the State (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 in VI. 3.c. and f., 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 the Homeless."

- i. Describe the State'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 fourth 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 State'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  No  N/A

5. Does the State'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  No  N/A

6. **Performance Goals and Benchmarks**- § 91.320(k)(5)(iii)

The State has met the requirement to provide for performance goals and benchmarks against which the State will measure its progress, consistent with the State'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  No

**7. Maximum Per-unit Development Subsidy Amount-** § 91.320(k)(5) and § 93.300(a)

Enter or attach the State'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 State 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.

Colorado performed an analysis of the cost to replace a unit with the higher of 60% AMI rent or FMR with a unit with 30% AMI rent in various locations across the State. In no area of the State did this cost exceed the HOME maximum per-unit subsidy amount. Colorado has adopted the HOME maximum per-unit subsidies as its HTF maximum per-unit subsidies.

The 2017 maximum per-unit subsidies are as follows:

Max Subsidy 0 bedroom: \$141,089

Max Subsidy 1 bedroom: \$161,738

Max Subsidy 2 bedroom: \$196,673

Max Subsidy 3 bedroom: \$254,431

Max Subsidy 4 bedroom: \$279,286

**8. Rehabilitation Standards - § 91.320(k)(5)(iv) and § 93.301(b)**

The State 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 State'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. At a minimum, the rehabilitation standards must address:

- Health and safety;
- Major systems;
- Lead-Based Paint;
- Accessibility;
- Disaster Mitigation;
- State and local Codes, Ordinances, and Zoning Requirements;
- Inspectable Areas and Observable Deficiencies from HUD's Uniform Physical Condition Standards identified by HUD as applicable to HTF-assisted housing;  
and
- Capital Needs Assessments (if applicable).

Enter or attach the State's rehabilitation standards. If the State will not use HTF funds for rehabilitation of housing, enter "N/A".

See attached.

**9. Resale or Recapture Guidelines- § 91.320(k)(5)(v) and § 93.304(f)**

If the State intends to use HTF funds to assist first-time homebuyers, it must set forth the guidelines for resale or recapture and obtain HUD specific, written approval, as required in § 93.304(f). Approval of the consolidated plan or annual action plan under § 91.500 or the failure to disapprove the consolidated plan or annual action plan does not satisfy the requirement for specific HUD approval for resale or recapture guidelines.

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 State will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A



**10. HTF Affordable Homeownership Limits- § 91.320(k)(5)(vi) and § 93.305**

If the State 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 State will not use HTF funds to assist first-time homebuyers, enter "N/A".

- The State will use the HUD issued affordable homeownership limits.
- The State has determined its own affordable homeownership limits using the methodology described in § 93.305(a)(2) and the limits are attached.
- N/A

**11. State Limited Beneficiaries or Preferences- § 91.320(k)(5)(vii)**

Describe how the State will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the State will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A".

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the State must not limit or give preferences to students. The State 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.

The State will limit beneficiaries and/or give preferences to the following segments of the extremely low-income population:

- People with disabilities or other special needs (e.g. individuals/families exiting homelessness)

The groups listed have also been identified in the action plan in AP 25-Allocation Priorities.

**12. Refinancing of Existing Debt- § 91.320(k)(5)(viii) and § 93.201(b)**

Enter or attach the State's refinancing guidelines below. The guidelines describe the conditions under which the State will refinance existing debt. The State'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 State will not refinance existing debt, enter "N/A".

N/A

## VII. GRANTEE CERTIFICATIONS

---

In addition to submitting an HTF allocation plan, the State must submit all the required certifications identified at § 91.225 (for new action plans). If the State is amending the action plan to include HTF, it must resubmit the following certification to include HTF:

- Consistency with plan- The jurisdiction must submit a certification that the housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan. Where the HOPWA funds are to be received by a city that is the most populous unit of general local government in an EMSA, it must obtain and keep on file certifications of consistency from the authorized public officials for each other locality in the EMSA in which housing assistance is provided. HTF must be included in this certification.

## VIII. REQUIRED FORMS

---

In addition to submitting an HTF allocation plan, the State must submit and/or complete the following standard form for its HTF program.

- Standard form- 424: [Application for Federal Assistance](#) (§ 91.320(a))

## IX. RESOURCES

---

The following resources should be referenced before developing and submitting the HTF allocation plan.

### HTF Resources

- HTF website- [www.hudexchange.info/htf](http://www.hudexchange.info/htf)
- HTF [Interim Rule](#)
- Notice CPD-17-05 [Guidance for HTF Grantees on Fiscal Year 2017 Housing Trust Fund \(HTF\) Allocation Plans](#)
- HTF [FAQs](#)
  - o HTF Maximum Per-Unit Development Subsidy Amounts
  - o HTF Rehabilitation Standards
- HTF Webcast on [Overview of the HTF program](#)
- HTF Webinar on [Developing HTF Allocation Plans](#)
- HTF [Formula Allocation](#)


## Consolidated Plan Resources

- eCon Planning Suite website- <https://www.hudexchange.info/consolidated-plan/econ-planning-suite/>
- Notice CPD-12-009: [Use of IDIS to Submit the Consolidated Plan](#)
- Consolidated Plan in IDIS [Desk Guide](#)
- Con Plan Quick Guide: [Amending a Consolidated Plan and Annual Action Plan For State, Entitlement & Regional Grantees.](#)





## X. APPENDICES




### Appendix A: eCon Planning Suite Editing Options

#### Narrative Fields and the 4,000 Character Limit

The limit on the amount of text is 4,000 characters per field. The character limit includes white spaces, formatting marks such as new paragraphs, and other hidden characters. For example, the following text “The **quick** brown fox” contains 16 visible characters, but also contains 3 white space characters and additional hidden characters related to the bold and underline formatting. Users can select the  option to display and remove the hidden formatting.

#### Other Editing Options

Tools	Description
	Bold Italics Underline
	Bullet List Numbered List
	Undo Redo
	Paste as Plain Text. If this tool is toggled on, any text pasted into the narrative box will be stripped of all formatting.  Paste from Word. This tool will allow the pasted text to retain limited formatting, including Bold, Italics, Underline, and simple

Tools	Description
	numbered and bulleted lists. Paste from Word will not retain more complex formatting, such as tables and indentation.
	Select All. This tool selects all of the text currently entered in the narrative box.
	Show/Hide Visual Control Characters. This tool is used to toggle the display of hidden formatting, such as paragraph marks (not currently functional).
	Edit HTML Source. This tool opens a dialog box where users can edit the HTML Code to format the text of the narrative box.

**Adding Additional Text Box for Narrative:**

To input additional narrative beyond 4,000 characters, grantees can add another [text box](#). Due to embedded formatting in PDF documents, grantees should not try to copy text from PDFs, but should only use text or Microsoft Word files.

The screenshot below shows the features of narrative fields in the template.



## Appendix B: Amending a Consolidated Plan and Annual Action Plan

### I. Amending Approved Consolidated Plan/Year 1 Action Plan

The State should follow these instructions to amend its consolidated plan and annual action plan to include HTF. All States are responsible for amending their individual Action Plans.

To amend a Consolidated Plan/Year 1 Action Plan, grantees must first copy the existing plan.

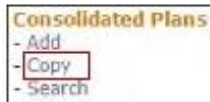
1. Click "Search" under the Consolidated Plan submenu.



2. Make note of the Year and Version of the Plan to be amended.

Source Year 1 of 1	State	Year	Version	Title	Status	Action
2017-2018	IL	2017	1	2017-2018 Year 1 Consolidated Plan Approval	Review/Completed	View

3. Click "Copy" under the Consolidated Plan submenu.



4. Enter the Source Year and Version from the Plan to be copied (identified in Step 2).



A screenshot of a web form titled "Copy". The form contains several input fields and a dropdown menu:

- Source Consolidated Plan's Start Year:
- Source Consolidated Plan's Version:
- New Consolidated Plan's Start Year:
- New Consolidated Plan's End Year:
- New Consolidated Plan's Version:
- Amendment:

5. Enter the Start Year, End Year and Version for the amended plan. For amendments, the Start Year must be the same as the Source Plan. Select whether the amendment is Minor or Substantial from the dropdown menu.

6. Once completed, click "Copy." The Amended plan will be accessible from the Consolidated Plan search screen. The default title of the copied plan will be "ConPlan Copy." Grantees can change the title on the AD-25 screen.
7. If the copy is a Substantial Amendment, the AD-25 screen will include a text box following the "If Amendment" dropdown menu to explain the amendment.

The screenshot shows a form with a dropdown menu labeled "If Amendment:" with "Substantial" selected. Below it is a text box labeled "If Substantial Amendment, explain:".

8. All amendments, minor and substantial, must be submitted for review in IDIS to ensure the amended information is included in the CAPER. Depending on the amendment, the Field Office may not conduct a full review of the plan, but must functionally mark the amended plan as "Review Complete" in IDIS.

## II. Amending the Action Plan

1. Click "Search" under the Action Plan submenu and note the Year and Version of the Action Plan to be amended.
2. Click "Copy" in the Action Plan submenu.



3. Enter information in the fields provided. For amendments, the Program Year for the amended plan must be the same as the Source Program Year.



**Copy Annual Action Plan**

---

Copy | Cancel

---

Source AAP Program Year:\*

Source AAP Plan Version:\*

New AAP Program Year:\*

New AAP Plan Version:\*

If Amendment: \*

4. Select whether the amendment is Minor or Substantial.
5. When complete, click "Copy". The amended plan will be accessible from the Action Plan search screen. The default title of the copied plan will be "AAP Copy." Grantees can change the title on the AD-26 screen.
6. If the copy is a Substantial Amendment, the AD-26 screen will include a text box immediately following the "If Amendment" dropdown menu to explain the amendment.

If Amendment:

If Substantial Amendment, explain:\*

7. All amendments, minor and substantial, must be submitted for review in IDIS to ensure the amended information is included in the CAPER. Depending on the amendment, the Field Office may not conduct a full review of the plan, but must functionally mark the amended plan as "Review Complete" in IDIS.

## 2017 Housing Trust Fund Allocation Plan Supplemental Information

### 1.) **Maximum Per-unit Development Subsidy Amount-** § 91.320(k)(5) and § 93.300(a)

The State must establish its own maximum limitations on the total amount of HTF funds that can be invested per-unit for development of non-luxury housing. The limits must be reasonable, based on actual costs, and adjusted for the number of bedrooms and geographic location of the project. The State may choose to develop its own limits or adopt limits used in other federal programs such as HOME or Low-Income Housing Tax Credit and must submit them with its HTF allocation plan.

**The State must submit a description of how the HTF maximum per-unit development subsidy amounts were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements.**

DOLA performed an analysis of the cost to replace a unit with the higher of 60% AMI rent or FMR with a unit with 30% AMI rent in various locations across the State. In no area of the State did this cost exceed the HOME maximum per-unit subsidy amount. The 2017 HOME maximum per-unit subsidies are listed in the HTF Allocation Plan in Section 7.

### 2.) **State Limited Beneficiaries or Preferences-** § 91.320(k)(5)(vii)

The State will limit beneficiaries and/or give preferences to the following segments of the extremely low-income population:

- People with disabilities or other special needs (e.g. individuals/families exiting homelessness)

The groups listed have also been identified in the action plan in AP 25-Allocation Priorities.

### 3.) **Waiver of Public Comment Period**

In accordance with the waiver of 24 CFR 91.115(b)(4) and 24 CFR 91.105(b)(4) for FY 2017 Action Plans for Housing Trust Fund, the Colorado Department of Local Affairs will utilize the waiver and post the HTF Allocation Plan for a period of 14 days. DOLA is taking advantage of the waiver due to the late announcement of HUD's 2017 allocation amounts. The 2017 Annual Action Plan included HTF, and was posted for public comment for more than 30-days. A public meeting was held on July 6, 2017 regarding the Annual Action Plan in regards to HOME, ESG, CDBG, HOPWA, and HTF.

### 4.) **Response to Additional Public Comments Received During HTF Comment Period**

A Denver Metro-area non-profit agency reached out to DOLA to provide comments on their perceived difficulty using HTF funds for preservation, particularly of smaller, non-LIHTC rental rehabilitation projects. DOLA staff clarified the State's application/underwriting standards and the allowable uses of HTF funds, and invited the agency to reach out to DOLA's applicable regional housing development specialist to discuss potential applications.



**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. These Rehab Standards are written to comply with the requirements of the federal HOME Investment Partnership Program (HOME) and the National Housing Trust Fund Program (HTF). Multi-family properties rehabilitated with the use of DOH funding shall meet or exceed these standards at the time of project completion, in accordance with 24 CFR 92.251(b) (HOME) and 93.301(b) (HTF). These Rehab Standards 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

<b>Contaminants [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
N/A	
<b>Replacement Standard</b>	
<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"> <li>• All paints and primers should meet the most recent Green Seal G-11 Environmental Standard. <a href="http://www.greenseal.org/Home.aspx">http://www.greenseal.org/Home.aspx</a></li> <li>• 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.</li> </ul>	

<b>Lead-Based Paint (LBP) [GREEN STANDARD]</b>	
<b>Repair Standard ("Interim Controls")</b>	
<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: <a href="http://www.hud.gov/offices/lead/lbp/hudguidelines/">http://www.hud.gov/offices/lead/lbp/hudguidelines/</a></p> <p>All interim controls shall be performed as follows and by properly trained workers:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Occupants may be temporarily relocated as required by the regulations.</li> <li>• All surfaces coated with LBP shall be properly maintained over the life of the program covenants.</li> <li>• 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.</li> </ul>	
<b>Replacement Standard ("Abatement")</b>	
<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 <a href="#">National Radon Proficiency Program</a>." Individuals can also get coupons for mail-order test kits on the Colorado Dept. of Public Health and Environment's website: <a href="http://www.colorado.gov/cs/Satellite/CDPHE-HM/CBON/1251617274212">http://www.colorado.gov/cs/Satellite/CDPHE-HM/CBON/1251617274212</a></p>	
<b>Replacement Standard</b>	
<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: <a href="http://www.epa.gov/radon/pubs/consguid.html">http://www.epa.gov/radon/pubs/consguid.html</a>.</p> <p>If the home's water comes from a private well, the water should also be tested. Water testing is available from the <a href="#">Colorado Department of Public Health and Environment's Laboratory Services Division</a>.</p>	

<b>Mold [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
<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>	
<b>Replacement Standard</b>	
<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:  <a href="http://www.nchh.org/Portals/0/Contents/FloodCleanupGuide_screen_.pdf">http://www.nchh.org/Portals/0/Contents/FloodCleanupGuide_screen_.pdf</a></p>	

Fire Safety - Egress	
<b>Repair Standard</b>	
N/A	
<b>Replacement Standard</b>	
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]	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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]	
<b>Repair Standard</b>	
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: <a href="http://www.denverwater.org/Conservation/Xeriscape/">http://www.denverwater.org/Conservation/Xeriscape/</a>	
<b>Replacement Standard</b>	N/A
N/A	



<b>Outbuildings</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	N/A
DOH rehabilitation funds may not be used to replace outbuildings.	

<b>Fencing and Gates</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
DOH rehabilitation funds may not be used to replace fencing.	

<b>Paving And Walks</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
Un-repairable essential walks and driveways shall be replaced with permeable paving, if financially feasible <b>[GREEN STANDARD]</b> , 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.	

<b>Trees and Shrubbery</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b> [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.	

<b>Lawn</b> [GREEN STANDARD]	
<b>Repair Standard</b>	
Bare section of lawn may be reseeded with drought-resistant grasses or plantings. For more information, see Denver Water's website at: <a href="http://www.denverwater.org/Conservation/Xeriscape/">http://www.denverwater.org/Conservation/Xeriscape/</a>	
<b>Replacement Standard</b>	
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.

<b>Exterior Cladding [MAJOR SYSTEM] [GREEN STANDARD]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
Buildings may have siding replaced with wood, vinyl or cementitious siding to match the existing configuration. New wood components shall be FSC certified: <a href="http://www.fsc.org/">http://www.fsc.org/</a> . All new surfaces that will receive paint shall be primed prior to painting.	

<b>Exterior Porches</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.	



<b>Exterior/Interior Railings</b>	
<b>Repair Standard</b>	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.
<b>Replacement Standard</b>	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.

<b>Exterior Decks and Exterior/Interior Steps</b>	
<b>Repair Standard</b>	Steps, stairways, and porch decks shall be structurally sound, reasonably level, with smooth and even surfaces. Repairs shall match existing materials.
<b>Replacement Standard</b>	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**

<b>Firewalls <span style="color: red;">[MAJOR SYSTEM]</span></b>	
<b>Repair Standard</b>	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.
<b>Replacement Standard</b>	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.

<b>Foundations [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
Foundation replacements shall be completed to meet local codes (or IEBC).	

<b>Structural Walls [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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

<b>Interior Doors</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
Hollow-core, pressed-wood product consistent with the style of existing doors including latch-sets. Baths and occupied bedrooms shall have lock sets.	

<b>Exterior Doors [MAJOR SYSTEM]</b>	
<b>Repair Standard</b>	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.
<b>Replacement Standard</b>	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.

<b>Windows [MAJOR SYSTEM] [GREEN STANDARD]</b>	
<b>Repair Standard</b>	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.
<b>Replacement Standard</b>	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: <a href="http://www.energystar.gov/index.cfm?c=windows_doors.pr_anat_window">http://www.energystar.gov/index.cfm?c=windows_doors.pr_anat_window</a> 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.

<b>Basement Windows and Ventilation</b> [MAJOR SYSTEM]	
<b>Repair Standard</b>	
If feasible, two basement windows on opposite sides of the building should be operable for ventilation, in good working order, and lockable.	
<b>Replacement Standard</b>	
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

<b>Flat and Low-Slope Roofing</b> [MAJOR SYSTEM]	
<b>Repair Standard</b>	
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 alligatoring 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.	
<b>Replacement Standard</b>	
The most cost-effective roof shall be installed to the manufacturer’s specifications and in accordance with local codes (or IEBC).	

<b>Pitched Roofs</b> [MAJOR SYSTEM]	
<b>Repair Standard</b>	
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.	

<b>Replacement Standard</b>	
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).	

<b>Gutters and Downspouts</b> [MAJOR SYSTEM] [GREEN STANDARD]	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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

<b>Infiltration</b> [GREEN STANDARD]	
<b>Repair Standard</b>	
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).	
<b>Replacement Standard</b>	
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).	

<b>Insulation</b> [GREEN STANDARD]	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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: <a href="http://www.energystar.gov/ia/partners/bldrs_lenders_raters/downloads/Thermal_Bypass_Inspection_Checklist.pdf">http://www.energystar.gov/ia/partners/bldrs_lenders_raters/downloads/Thermal_Bypass_Inspection_Checklist.pdf</a>	

<b>Bath Ventilation</b> [MAJOR SYSTEM] [GREEN STANDARD]	
<b>Repair Standard</b>	
All bathroom ventilation shall meet the local building code (or IEBC) for bath ventilation that was in effect at the time of their construction.	
<b>Replacement Standard</b>	
All bathrooms shall be mechanically vented to the $\geq 80$ CFM creating $\leq 0.3$ 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).	

<b>Kitchen Ventilation</b> [MAJOR SYSTEM] [GREEN STANDARD]	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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).	



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

## 8 - Interior Standards

<b>Interior Walls and Ceilings</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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).	

<b>Flooring</b>	
<b>Repair Standard</b>	
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>	
<b>Replacement Standard</b>	
<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: <a href="http://www.carpet-rug.org/residential-customers/selecting-the-right-carpet-or-rug/green-label.cfm">http://www.carpet-rug.org/residential-customers/selecting-the-right-carpet-or-rug/green-label.cfm</a></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>	

<b>Closets</b>	
<b>Repair Standard</b>	
Existing closets shall be maintained in good repair and have a shelf and clothes rod.	
<b>Replacement Standard</b>	
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.	



<b>Cabinets and Countertop</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.	

<b>Appliances</b>	
<b>Repair Standard</b>	
All appliances in units shall be in proper working order and in clean and sanitary condition.	

<b>Replacement Standard</b>	
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).

<b>Lighting</b>	
<b>Repair Standard</b>	
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.	

<b>Replacement Standard</b>	
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.	

<b>Interior Electric Distribution</b> [MAJOR SYSTEM]	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
If wall finishes are removed, those areas shall be wired to the latest version of local codes (or State Electrical Code).	

<b>Service and Panel</b> [MAJOR SYSTEM]	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.

<b>Drain, Waste, Vent Lines</b> [MAJOR SYSTEM]	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
If walls are removed exposing vent and waste lines, those lines shall be reworked or replaced to the current mechanical code.	

<b>Plumbing Fixtures</b>	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.	

<b>Plumbing Minimum Equipment</b> [MAJOR SYSTEM]	
<b>Repair Standard</b>	
All existing equipment shall be operational and leak free.	
<b>Minimum Standard</b>	
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.	

<b>Water Heaters</b> [MAJOR SYSTEM]	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
Hot water systems that are replaced shall be of adequate capacity, be installed per manufacturer's specifications and meet local codes (or IEBC).	
[GREEN STANDARD] High efficiency power-vented or sealed combustion tankless models are allowed.	

<b>Water Supply</b> [MAJOR SYSTEM]	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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

<b>Air Conditioning</b> [MAJOR SYSTEM] [GREEN STANDARD]	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.	

<b>Chimney</b> [MAJOR SYSTEM]	
<b>Repair Standard</b>	
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.	

<b>Replacement Standard</b>	
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.	

<b>Distribution System</b> [MAJOR SYSTEM]	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
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.	

<b>Heating</b> [MAJOR SYSTEM]	
<b>Repair Standard</b>	
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.	
<b>Replacement Standard</b>	
Gas-fired heating plants shall be rated at $\geq$ 92% AFUE or better, to the extent possible. Heat pumps shall be rated at $\geq$ 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).	

<b>Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation</b>		
<b>NOTE:</b> Observable Deficiencies in <i>* Bold Italic</i> are considered life-threatening and must be addressed immediately, if the housing is occupied.		
<b>Inspectable Item</b>	<b>Observable Deficiency</b>	<b>Type and Degree of Deficiency that must be addressed</b>
<b>Requirements for Site</b>		
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
	<i>*Air Quality - Propane/Natural Gas/Methane Gas Detected</i>	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
	<i>*Electrical Hazards - Exposed Wires/Open Panels</i>	Exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	<i>*Electrical Hazards - Water Leaks on/near Electrical Equipment</i>	Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	<i>*Flammable Materials - Improperly Stored</i>	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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Inspectable Item	Observable Deficiency	Type and Degree of Deficiency that must be addressed
<b>Requirements for Building Exterior</b>		
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
	<b>*Blocked Egress/Ladders</b>	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	<b>*Electrical Hazards - Exposed Wires/Open Panels</b>	Exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	<b>*Electrical Hazards - Water Leaks on/near Electrical Equipment</b>	Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	<b>*Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable</b>	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
	<b>*Emergency Fire Exits - Missing Exit Signs</b>	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	<b>*Flammable/Combustible Materials - Improperly Stored</b>	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
Lighting	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
	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



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<b>Inspectable Item</b>	<b>Observable Deficiency</b>	<b>Type and Degree of Deficiency that must be addressed</b>
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
	<b>*Security Bars Prevent Egress</b>	The ability to exit through egress window is limited by security bars that do not function properly and, therefore, pose safety risks
<b>Requirements for Building Systems</b>		
<b>Inspectable Item</b>	<b>Observable Deficiency</b>	<b>Type and Degree of Deficiency that must be addressed</b>
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
	<b>*Missing Outlet Covers</b>	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
	<b>*Missing/Damaged/Expired Extinguishers</b>	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
	<b>*Air Quality - Propane/Natural Gas/Methane Gas Detected</b>	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
	<b>Electrical Hazards - Exposed Wires/Open Panels</b>	Exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	<b>*Electrical Hazards - Water Leaks on/near Electrical Equipment</b>	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
	<b>*Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable</b>	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
	<b>*Emergency Fire Exits - Missing Exit Signs</b>	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	<b>*Flammable Materials - Improperly Stored</b>	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
	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
HVAC	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

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Inspectable Item	Observable Deficiency	Type and Degree of Deficiency that must be addressed
	<b>*Misaligned Chimney/Ventilation System</b>	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
<b>Requirements for Common Areas</b>		
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	Any door that does not function as it should or cannot be locked because of damage to the door's hardware
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
	<b>*Electrical - Missing Covers</b>	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
	<b>*HVAC - Misaligned Chimney/Ventilation System</b>	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

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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
	<b>*Outlets/Switches/Cover Plates - Missing/Broken</b>	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
	<b>*Smoke Detector - Missing/Inoperable</b>	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
	<b>*Windows - Security Bars Prevent Egress</b>	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
	<b>*Air Quality - Propane/Natural Gas/Methane Gas Detected</b>	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
	<b>*Electrical Hazards - Exposed Wires/Open Panels</b>	Exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	<b>*Electrical Hazards - Water Leaks on/near Electrical Equipment</b>	Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	<b>*Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable</b>	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
	<b>*Emergency Fire Exits - Missing Exit Signs</b>	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	<b>*Flammable/Combustible Materials - Improperly Stored</b>	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

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<b>Inspectable Item</b>	<b>Observable Deficiency</b>	<b>Type and Degree of Deficiency that must be addressed</b>
	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
<b>Requirements for Unit</b>		
<b>Inspectable Item</b>	<b>Observable Deficiency</b>	<b>Type and Degree of Deficiency that must be addressed</b>
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
	<b>*Missing Covers</b>	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		
<b>NOTE:</b> 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
	<b>*Air Quality - Propane/Natural Gas/Methane Gas Detected</b>	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
	<b>*Electrical Hazards - Exposed Wires/Open Panels</b>	Exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	<b>*Electrical Hazards - Water Leaks on/near Electrical Equipment</b>	Water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	<b>*Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable</b>	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
	<b>*Emergency Fire Exits - Missing Exit Signs</b>	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	<b>*Flammable Materials - Improperly Stored</b>	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
	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
	Infestation - Rats/Mice/Vermin	Evidence of rats or mice--sightings, rat or mouse holes, or droppings
Hot Water Heater	<b>*Misaligned Chimney/Ventilation System</b>	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
	<b>*Missing/Broken Cover Plates</b>	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	<b>*Missing/Inoperable</b>	Smoke detector is missing or does not function as it should
Stairs	Broken/Damaged/Missing Steps	A step is missing or broken

<b>Multifamily Rehabilitation Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation</b>		
<b>NOTE:</b> Observable Deficiencies in <i>*Bold Italic</i> are considered life-threatening and must be addressed immediately, if the housing is occupied.		
<b>Inspectable Item</b>	<b>Observable Deficiency</b>	<b>Type and Degree of Deficiency that must be addressed</b>
	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
	<b><i>*Security Bars Prevent Egress</i></b>	The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks




**Grantee SF-424's and Certification(s)**



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 type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: 06/15/2017	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"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: State of Colorado		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 84-0644733	* c. Organizational DUNS: 8781324830000	
d. Address:		
* Street1: 1313 Sherman St	Street2: Room 500	
* City: Denver	County/Parish: Denver	
* State: CO: Colorado	Province: <input type="text"/>	
* Country: USA: UNITED STATES	* Zip / Postal Code: 80203-2241	
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: Ms.	* First Name: Melissa	
Middle Name: A.	* Last Name: Thabe	
Suffix: <input type="text"/>	Title: Consolidated Plan Coordinator	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 303-854-7844	* Fax Number: 303-864-7856	
* Email: melissa.thabem@state.co.us		

Application for Federal Assistance SF-424	
<p><b>* 9. Type of Applicant 1: Select Applicant Type:</b></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><b>* 10. Name of Federal Agency:</b></p> <input type="text" value="Department of Housing and Urban Development"/>	
<p><b>11. Catalog of Federal Domestic Assistance Number:</b></p> <input type="text" value="14.211"/> <p>CFDA Title:</p> <input type="text" value="Emergency Solutions Program"/>	
<p><b>* 12. Funding Opportunity Number:</b></p> <input type="text" value=""/> <p>* Title:</p> <input type="text" value=""/>	
<p><b>13. Competition Identification Number:</b></p> <input type="text"/> <p>Title:</p> <input type="text"/>	
<p><b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b></p> <input type="text" value="All Colorado Counties.docx"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<p><b>* 15. Descriptive Title of Applicant's Project:</b></p> <input type="text" value="Program description for 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	
<b>16. Congressional Districts Of:</b>	
* a. Applicant: <input type="text" value="CO-001"/>	* b. Program/Project: <input type="text" value=""/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text" value="All Colorado Counties.docx"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>17. Proposed Project:</b>	
* a. Start Date: <input type="text" value="04/01/2017"/>	* b. End Date: <input type="text" value="03/31/2018"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input type="text" value="1,961,476.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value="1,961,476.00"/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="3,922,952.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text" value=""/>	
<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.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text" value=""/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>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)</b>	
<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>	
<b>Authorized Representative:</b>	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Irv"/>
Middle Name: <input type="text" value=""/>	
* Last Name: <input type="text" value="Halter"/>	
Suffix: <input type="text" value=""/>	
* Title: <input type="text" value="Executive Director, Department Local Affairs"/>	
* Telephone Number: <input type="text" value="303-864-7861"/>	Fax Number: <input type="text" value="303-864-7878"/>
* Email: <input type="text" value="irv.halter@state.co.us"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="7/11/18"/>

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 type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* 3. Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: 06/12/2017	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"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: STATE OF COLORADO		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 04-0044710	* c. Organizational DUNS: 0101324010000	
d. Address:		
* Street 1: 1313 Sherman St.	Street 2: Room 505	
* City: Denver	County/Parish: Denver	
* State: CO; Colorado	Province: <input type="text"/>	
* Country: USA; UNITED STATES	Zip/Postal Code: 80203-0241	
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: Ms.	* First Name: Melissa	Middle Name: A.
* Last Name: Thate	Suffix: <input type="text"/>	
Title: Housing Program Assistant		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 303-860-7849	Fax Number: 303-851-7856	
* Email: melissa.thate@state.co.us		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="State Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="Department of Housing and Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.219"/>	
<b>CFDA Title:</b> <input type="text" value="HOME Investment Partnership Program"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text"/>	
<b>* Title:</b> <input type="text"/>	
<b>13. Competition Identification Number:</b> <input type="text"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="Program description for HOME Investment Partnership Program"/>	
<b>Attach supporting documents as specified in agency instructions.</b> <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:  \* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

\* a. Start Date:  \* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="4,518,840.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="1,810,000.00"/>
* g. TOTAL	<input type="text" value="6,328,840.00"/>

\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

Yes  No

If "Yes", provide explanation and attach

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 28, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internal site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:  \* First Name:

Middle Name:


\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

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 type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revis on, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: 06/15/2017	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>B. APPLICANT INFORMATION:</b>		
* 8. Legal Name: State of Colorado		
* 9. Employer/Taxpayer Identification Number (EIN/TIN): 83-0614710	* 10. Organizational DUNS: 0701924030030	
d. Address:		
* Street1: 1313 Sherman St.	<input type="text"/>	
Street2: Room 500	<input type="text"/>	
* City: Denver	<input type="text"/>	
County/Parish: Denver	<input type="text"/>	
* State: CO	Colorado	
Province: <input type="text"/>	<input type="text"/>	
* Country: USA	UNITED STATES	
* 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:		
First Name: Melissa	<input type="text"/>	
Middle Name: A.	<input type="text"/>	
* Last Name: Thole	<input type="text"/>	
Suffix: <input type="text"/>	<input type="text"/>	
Title: Housing Program Assistant	<input type="text"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 303-864-7844	Fax Number: 303-864-7856	
* Email: melissa.thole@state.co.us		



Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type:	
A: State Government	
Type of Applicant 2: Select Applicant Type:	
Type of Applicant 3: Select Applicant Type:	
* Other (specify):	
* 10. Name of Federal Agency:	
Department of Housing and Urban Development	
11. Catalog of Federal Domestic Assistance Number:	
14.375	
CFDA Title:	
Housing Trust Fund	
* 12. Funding Opportunity Number:	
* Title:	
13. Competition Identification Number:	
Title:	
14. Areas Affected by Project (Cities, Counties, States, etc.):	
81: Colorado Counties.docx	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
* 15. Descriptive Title of Applicant's Project:	
Housing Trust Fund	
Attach supporting documents as specified in agency instructions	
<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:  \* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:  \* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="0,154,931.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="0,154,931.00"/>

\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

Yes  No

If "Yes," provide explanation and attach

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 28, Section 1001)

\*\* 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.

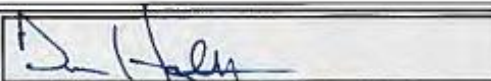
**Authorized Representative:**

Prefix:  \* First Name:  Middle Name:  \* Last Name:  Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

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 type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	
* If Revision, select appropriate letter(s): <input type="text"/>	
* Other (Specify): <input type="text"/>	
* 3. Date Received: 04/15/2017	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"/>
8. APPLICANT INFORMATION:	
* a. Legal Name: State of Colorado	
* b. Employer/Taxpayer Identification Number (EIN/TIN): 04-0644739	* c. Organizational DUNS: 8782924830009
d. Address:	
* Street:	1513 Sherman St
* Street2:	Room 202
* City:	Denver
* County/Parish:	Denver
* State:	CO, Colorado
* Province:	
* Country:	USA, UNITED STATES
* Zip / Postal Code:	80201-2541
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: Mr.	* First Name: Meg Lisa
Middle Name: R	
* Last Name: Thistle	
Suffix: <input type="text"/>	
Title: Consolidated Plan Coordinator	
Organizational Affiliation: <input type="text"/>	
* Telephone Number: 303-864-1844	* Fax Number: 303-864-7056
* Email: me.lisa.thistle@state.co.us	

**Application for Federal Assistance SF-424**

\* 8. Type of Applicant 1: Select Applicant Type:  
 A: State Government

Type of Applicant 2: Select Applicant Type

Type of Applicant 3: Select Applicant Type

\* Other (specify):

\* 10. Name of Federal Agency:  
 Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:  
 34.241  
 CFDA Title:  
 Housing Opportunities for Persons with AIDS

\* 12. Funding Opportunity Number:

\* Title:

13. Competition Identification Number:  
 Title:


14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment Delete Attachment View Attachment

\* 15. Descriptive Title of Applicant's Project:  
 Program description for Housing Opportunities for Persons with AIDS Program

Attach supporting documents as specified in agency instructions


Add Attachments Delete Attachments View Attachments

Application for Federal Assistance SF-434	
16. Congressional Districts Of:	
* a. Applicant: 20-001	* b. Program/Project:
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: 04/01/2017	* b. End Date: 03/31/2018
18. Estimated Funding (\$):	
* a. Federal:	301,302.00
* b. Applicant:	
* c. State:	
* d. Local:	
* e. Other:	
* f. Program Income:	
* g. TOTAL:	301,302.00
* 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 Set 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 28, 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:      Div
Middle Name:	
* Last Name:	Halter
Suffix:	
* Title:	Executive Director, Department Local Affairs
* Telephone Number:	303-664-7861      Fax Number: 303-664-7878
* Email:	div.halter@state.co.us
* Signature of Authorized Representative:	 * Date Signed: 7/5/2017

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 type="checkbox"/> New <input checked="" 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="06/15/2017"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="State of Colorado"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="84-0644739"/>	* c. Organizational DUNS: <input type="text" value="8781924830000"/>	
<b>d. Address:</b>		
* Street1: <input type="text" value="1313 Sherman St"/>	<input type="text"/>	
Street2: <input type="text" value="Room 500"/>	<input type="text"/>	
* City: <input type="text" value="Denver"/>	<input type="text"/>	
County/Parish: <input type="text" value="Denver"/>	<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"/>	
<b>e. Organizational Unit:</b>		
Department Name: <input type="text" value="Department of Local Affairs"/>	Division Name: <input type="text"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Melissa"/>	<input type="text"/>
Middle Name: <input type="text" value="A."/>	<input type="text"/>	
* Last Name: <input type="text" value="Thate"/>	<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"/>	<input type="text"/>
* Email: <input type="text" value="melissa.thate@state.co.us"/>		

Application for Federal Assistance SF-424	
<p><b>* 9. Type of Applicant 1: Select Applicant Type:</b></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><b>* 10. Name of Federal Agency:</b></p> <input type="text" value="Department of Housing and Urban Development"/>	
<p><b>11. Catalog of Federal Domestic Assistance Number:</b></p> <input type="text" value="14.229"/> <p>CFDA Title:</p> <input type="text" value="Community Development Block Grant"/>	
<p><b>* 12. Funding Opportunity Number:</b></p> <input type="text"/> <p>* Title:</p> <input type="text" value="State and Small Cities Program"/>	
<p><b>13. Competition Identification Number:</b></p> <input type="text"/> <p>Title:</p> <input type="text"/>	
<p><b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b></p> <input type="text" value="CDBG Counties for 424.docx"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<p><b>* 15. Descriptive Title of Applicant's Project:</b></p> <input type="text" value="State-administered Small Cities CDBG 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"/>	



<b>Application for Federal Assistance SF-424</b>	
<b>16. Congressional Districts Of:</b>	
* a. Applicant: <input type="text" value="00-001"/>	* b. Program/Project: <input type="text"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text" value="COBG Counties for 424.docx"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>17. Proposed Project:</b>	
* a. Start Date: <input type="text" value="04/01/2017"/>	* b. End Date: <input type="text" value="03/31/2018"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input type="text" value="9,128,333.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="395,463.00"/>
* g. TOTAL	<input type="text" value="9,523,796.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>	
<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.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b>	
<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"/>
<b>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)</b>	
<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.	
<b>Authorized Representative:</b>	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Irv"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Halter"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Executive Director, Department Local Affairs"/>	
* Telephone Number: <input type="text" value="303-864-7861"/>	Fax Number: <input type="text" value="303-864-7878"/>
* Email: <input type="text" value="irv.halter@state.co.us"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="8/11/18"/>

## 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, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**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, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG 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-LLL, "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 CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official Date Title

### **Specific CDBG Certifications**

The State certifies that:

**Citizen Participation** —It is in full compliance and 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 or will be following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

**Consultation with Local Governments** —It has or will comply with the following:

- 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 housing and community development 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 objectives of Title I of the Housing and Community Development Act of 1974, as amended. (See 24 CFR 570.2 and 24 CFR part 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 certifies that 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 a 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. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2016, 2017, and 2018 shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
- 3 Special Assessments. The state will require units of general local government that receive CDBG funds to certify to the following:

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.

It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, 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 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Compliance with Laws**—It will comply with applicable laws.

  
\_\_\_\_\_  
Signature/Authorized Official

7/5/2017  
\_\_\_\_\_  
Date

Exec Dir. Community Dept of Local Affairs  
\_\_\_\_\_  
Title

**Specific HOME Certifications**

The State certifies that:

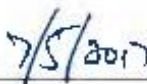
**Tenant Based Rental Assistance** --If it intends to provide tenant-based rental assistance:

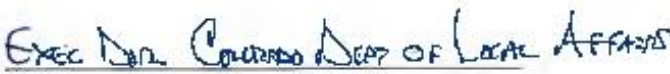
The use of HOME funds for tenant-based rental assistance is an essential element of the State's consolidated plan.

**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.

**Appropriate Financial Assistance** --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;

  
\_\_\_\_\_  
Signature Authorized Official

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Title



### ESG 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** – 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.

**HOPWA 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 plan:

- 1 For at least 10 years in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,
- 2 For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
\_\_\_\_\_  
Signature Authorized Official

7/5/2017  
\_\_\_\_\_  
Date

Eric Diaz Colorado Dept of Local Affairs  
\_\_\_\_\_  
Title

**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, 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.

  
\_\_\_\_\_  
Signature/Authorized Official

7/5/2017  
\_\_\_\_\_  
Date

Exec Dir. DEPT OF LOCAL AFFAIRS  
\_\_\_\_\_  
Title

**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING REQUIREMENTS:**

**A. 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.