



Colorado Department of Local Affairs

Division of Housing

2011-2012

Public Housing Agency Plan

Executive Summary of Annual Plan

The mission of the Colorado Department of Local Affairs (DOLA) Division of Housing (DOH) is to ensure that Coloradoans live in safe, decent and affordable housing. We do this by helping communities meet their housing goals. DOLA is the only department in the State that has both a Consolidated Plan and a Public Housing Agency Plan.

The Housing Choice Voucher (HCV) Program is a major Federal government program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Based on Federal requirements, DOH must provide 75 percent of its voucher to applicants whose incomes that are lower than 30 percent of the area median income. Median income levels are published by HUD and vary by location.

DOH is one of the designated agencies for the administration of the HCV Program in Colorado. DOH currently administers 2693 vouchers in 48 counties statewide. DOH's HCV Family Self-Sufficiency (FSS) and Homeownership Programs promote and provide education and opportunities for families to become economically self-sufficient; end the cycle of assistance; and, to recycle the vouchers to additional families in need.

DOH must comply with requirements of the U.S. Department of Housing and Urban Development (HUD) regarding activities as a Public Housing Agency (PHA) including the development of both a 5-year PHA Plan and Annual Plan. The Annual Plan provides an outline for the implementation of the HCV Program, including information on current needs from the Consolidated Plan and the makeup of the state's existing waiting list. Much of the Plan is developed based on Federal requirements. Each year, the Annual Plan is based on the premise that if we accomplish our goals and objectives we will be working towards the achievement of our mission. The statements, budget summary, and policies set forth in the Annual Plan all reflect the accomplishment of our Five-Year Plan goals and objectives. Taken as a whole, they outline a comprehensive approach consistent with the Consolidated Plan.

As part of the Agency Plan review process, DOH appoints a Resident Advisory Board which reviews and comments on components of the Agency Plan. The Advisory Board's comments are included in the Final Plan. The Plan is posted on DOH's website for a 45-day review period for public comment. The State Housing Board (SHB) members receive a copy of the Annual Plan and the Executive Summary, which is also put on the agenda during a scheduled meeting for the Board's endorsement.

DOH has also reviewed all internal policies and procedures to ensure compliance with changes in Federal program policy directives. These policies are updated and presented at the annual Section 8 meeting DOH holds for all agencies that administer the DOH Section 8 program and incorporated into the PHA Annual Plan.

Annually, DOH conducts a statewide housing survey to determine the number of families on Colorado's PHA waiting lists. The survey, although a snapshot in time, indicates that in January 2011, roughly 49,757 families were waiting for government rental assistance. This substantiates there is not enough deep subsidy rental assistance available to the lowest income renters in Colorado.

DOH tries to enhance our customer service by continuously working with staff to employ quality work practices and initiatives. In addition, DOH applies for additional HCV funding as Notifications of Funding Availability (NOFA) announcements are issued by HUD. DOH strives to improve the quality of life for the participants in these programs and ensure that only those who are truly qualified continue to be assisted, with efforts to identify and counteract instances of fraud. In summary, DOH is continuously working to provide quality affordable housing for extremely low, very low, and low income households in Colorado by operating a high quality housing voucher program.

Attachment B

6.0 PHA Plan Update

A) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Submission:

- **Waiting List Preferences
- **Informal Review and Hearing
- * Project Base
- * Collection Policy
- * Proration of Rent Policy
- * Interim Policy
- * 6 Levels of Verification Hierarchy – PIH Notice 2010 -19
- * Portability Policy

* Will be added to the Administrative Plan ** included in PHA Plan

B) Identify the specific locations where the public may obtain copies of the 5 Year and Annual Plan.

The PHA Agency Plan for FY 2011 is available for public inspection at the Division of Housings Office located at 1313 Sherman Street, Denver, CO Room #518 between the hours of 9:00 a.m. to 4:00 p.m.	The PHA Annual Plan for 2011 can also be found on the website : http://www.dola.colorado.gov As well as each of our Contractors locations.
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C) PHA Plan Elements (24CFR 903.7)

1. Eligibility, Selection and Admission Policies, including the Waiting List

A. Eligibility	<ul style="list-style-type: none">• All families must provide a social security number, disclosure, documentation of the social security numbers, and certification for each member of the household• All families must submit evidence of citizenship or eligible immigration status.• All families must meet income eligibility requirements• All adult family members must sign a consent forms for obtaining information• All families must meet the eligibility requirements concerning individuals enrolled in institutions of higher education• DOH obtains Criminal Background Investigation Report to screen for criminal and drug-related activity
B. Waiting List	<ul style="list-style-type: none">• DOH is a state agency, which contracts with local Public Housing Authorities, Councils of Government, and non-profit organizations. The waiting lists are maintained at the local level at the Contractors office. DOH allows each contracted agency some flexibility in structuring their waiting lists as long as there is compliance with Federal and DOH Administrative Plan requirements.
C. Search time	<ul style="list-style-type: none">• DOH will extend the issuance of the initial voucher for up to 120 days if the family needs and requests the extension.

D. Admission Preferences

DOH has established preferences and gives priority to serving families that meet the criteria. The system of preferences may select families from the list of priorities and according to the date and time of the application.

Preference 1

Families that include victims of homelessness
Families that include victims of domestic violence
Families that include victims of natural disaster

Preference 2

Families currently enrolled in education, training or upward mobility programs
Families currently working (An, applicant shall be given the benefit of the "working family preference" if the head of household and spouse, or sole member is age 62 or older, or is a person with disabilities).

Families currently participating in DOH TBRA or TANF Program

Families currently on the HPRP waiting list
Families that include a person with a disability

Preference 3

Date and Time

The family has a number 1 because they are homeless and a number 3 based on date and time of their application and another family has a number 2 because a family member is currently enrolled in an educational training, and a number 3 based on the date and time of application. The DOH Contractor will process the application with the preference numbers 1 and 3, even if the application with the numbers 2 and 3 was received earlier.

DOH also gives equal weight to the preferences, which means that having more than one preference does not boost a family higher on the list.

If a family qualifies for more than one selection preferences, such as a 1 because they are homeless, a 2 because they are a family enrolled in an educational or training program, and a 3 based on the date and time of the application, and another family has a number 1 because they are homeless, and a 3 based on the date and time, the Contractor will process whichever application was received first.

Income targeting that DOH plans to satisfy the Federal targeting requirements 75 percent of all new admissions to the Voucher Program to families at or below 30 percent of the area median income, and the remaining 25 percent of new admissions to families at or below 50 percent of the area median income.

The relationship of preferences to income targeting requirements is not applicable because the pool of applicant families ensures that the PHA will meet income-targeting requirements

2. Financial Resources CFR Part 903.79(b)

Anticipated Plan Resources

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.

HUD Formula Funds Administered by the Department of Local Affairs	Estimated Amount
Home Investment Partnership Funds (HOME)	\$7,268,808
Emergency Shelter Grant (ESG)	\$946,933
Community Development Block Grant (CDBG)	\$10,546,315
Housing Opportunities for Persons with AIDS (HOPWA)	\$400,000
Section 8 Housing Choice Vouchers	\$18,268,805
Other Estimated Federal Resources	
Homeless Prevention and Rapid Re-Housing Program (HPRP)	\$ 8,154,036
Low Income Energy Assistance Program	\$ 340,000
Community Services Block Grant	\$6,043,816
Community Services Block Grant Recovery (CSBG-R)	\$8,684,648
HUD's Challenge Grant in conjunction with DOT's TIGER II Grant Fund for the Sustainable Main Streets Initiative	\$1,280,000
Neighborhood Stabilization Program (NSP1)	\$5,098,309
McKinney Homeless Assistance (All CoC regions)	\$17,467,215
Metropolitan Denver Homeless Initiative CoC	\$13,175,836
Homeward Pikes Peak CoC	\$ 1,586,172
Balance of State CoC	\$ 2,705,207
Estimated State Resources	
Housing Development Grant	2,250,000
Estimated "Other Resources"	
Local Governments	\$10,000,000
Nonprofit Sector Contributions to Projects	\$ 3,109,500
Private Sector Contributions to Projects	\$ 5,000,000
Colorado State Tax Check-off for Homelessness Prevention	\$ 139,000

3. Rent Determination – 24 CFR Part 903.79(d)

Payment Standards

DOH has established the Contractor's Payment Standard (PS) at the current Fair Market Rent (FMR) in the Contractor's jurisdiction. Affordability adjustments may be made to provide additional rental subsidy to help families keep rents affordable. The Voucher Program is designed to keep rents affordable at the 40th percentile of the area rents.

- 100% of the FMR
- Up to 110% of the (FMR) is to be granted on a case by case basis
- Up to 110 % of the (FMR) for the entire geographical area that the vouchers are administered. A written request for the Contractor's area is to be submitted with backup documentation that will justify the request.
- Up to 120% of the FMR granted with a request for a reasonable accommodation. DOH will review and forward to HUD for approval. The Contractor should email DOH on agency letter head that includes: The family name, ID number, property address and reason for the request. DOH forwards the request to HUD and notifies the Contractor of the decision. This correspondence is kept in the family file for documentation.

Minimum Rent [24 CFR 5.630]

DOH has set its minimum monthly rent at \$50. If after verifying the family's income and assets, the contractor finds that the family does not have the ability to pay the minimum rent, the family may request a waiver concerning this requirement. The Contractor must request documentation of the hardship from the family. The Contractor will determine whether the hardship is temporary or long term. If the hardship is deemed temporary, the family must report on the status of their income every 30 days. Hardship determinations are subject to the State's Informal Hearing Process.

HUD regulations specify the formula for calculating the total tenant payment (TTP) for an assisted family. TTP is the highest of the following amounts, rounded to the nearest dollar:

- 30 percent of the family's monthly adjusted income (adjusted income is defined in Part II)
- The minimum rent is \$50

Family Share [24 CFR 982.305(a)(5)]

If a family chooses a unit with a gross rent (rent to owner plus an allowance for tenant-paid utilities) that exceeds DOH's applicable payment standard: (1) the family will pay more than the TTP, and (2) at initial occupancy DOH may not approve the tenancy if it would require the family share to exceed 40 percent of the family's monthly adjusted income. The income used for this determination must have been verified no earlier than 60 days before the family's voucher was issued.

4. Operation and Management

Organization Setup

Under the direction of the State Housing Board (SHB) and the Director, the staff of DOH administers the Voucher Program's day-to-day operations. The staffing information contained in this section includes only those positions directly responsible for the Program at the State level.

DOH Staff Functions

The DOH staff is responsible for administering the Section 8 Rental Assistance Program beginning with responding to HUD's Notice of Fund Availability (NOFA) to training Contractors in program administration and landlord housing assistance payments throughout the state. DOH considers the housing needs throughout the state by referencing the Colorado Consolidated Plan, which provides the guidance for the development of the state public housing agency strategies. DOH and its Contractors are charged with full responsibility of administering the housing programs designed to provide rental assistance to qualified families in privately owned dwelling units.

Colorado State Housing Board

The Colorado State Housing Board (SHB) was created in 1970 to advise the General Assembly, the Governor, and the Colorado Division of Housing on Colorado's Housing needs. The governor-appointed seven member SHB reviews financing requests and adopts regulations and policies for the administration of DOH programs. The SHB endorses the DOH PHA Agency Plan, Administrative Plan and SEMAP reporting requirements.

Executive Director

The Director of DOH serves as the Executive Director of the State of Colorado public housing agency.

Program Manager

This position is responsible for contracting with local agencies for delivery of the program services and fiscal year activities. The program manager is also responsible for the overall coordination of the program and development of necessary agreements between participating local agencies. In addition, the manager establishes and maintains effective contact with groups or individuals representing program related interests and is responsible for the program management. The Program Manager develops program materials and disseminates information to local agencies, and develops training sessions for the Contractors in program regulatory requirements as well as agency responsibilities.

Portfolio Manager

Responds to customer complaints, and programmatic questions and concerns. Supervises day-to-day activities of the Housing Asset Managers and oversees the monitoring of all Section 8 contracts. Please see Housing Asset Manager duties below.

Housing Asset Managers

There are going to be 2 Asset Managers on staff in 2011 and each is assigned a different geographical area of the state. These Asset Managers are responsible for programmatic monitoring of the Contractors in Section 8 compliance and Housing Quality Standards. The Asset Managers train new and existing housing agencies in federal rules and regulations concerning Section 8 rental assistance, Home Ownership, Veterans Housing (VASH), Family Unification and Family Self Sufficiency FSS programs. The Asset Managers organizes logistics for meetings and trainings. In addition, Asset Managers review vacancy reports on utilization of the program. Technical assistance to troubleshoot problems is also provided to the Contractors concerning family moves, income/rent adjustments, recertification, tenant/landlord relations, terminations, etc.

Program Operations Manager/Budget Officer

This position is responsible for supervising three Administrative Assistants who enter HUD statistical information (form 50058) into the Section 8 Program database. This position is responsible for the following: (1) coordinating VMS reporting with accounting staff, (2) administrative fee payment to contractors, (3) software interface with the COFRS, the states accounting system, (4) assisting in training Section 8 contractors on the requirements for payment through the state system, (5) tracking financial information for the program and the overall office administration for tracking payments for various aspects of the Program.

Administrative Assistant

These 3 positions are responsible for daily data entry, filing, and preparation of electronic and paper payment vouchers. These positions answer informational calls from DOH contractors, landlords and families receiving rental assistance. Each assistant maintains and updates 50058 family files, which contain information on the rental subsidy to be paid and utility allowance. This position assists in landlord payment reimbursement process and the monthly reconciliation of the Section 8 database to the DOH contractor request for the Section 8 Program and other programs in DOH. This position is responsible for PIC transmittal, PIC error corrections, repayment agreements, collections tracking, repayment agreements, payments and expenditure tracking and assists with the VMS reporting.

Program Assistant

The Program Assistant is responsible for assisting PIC transmittal, PIC error corrections, various collections for HUD reporting for the homeownership program, payments and expenditure tracking. This position is also responsible for EIV setup and renewals and the collection procedures.

Accounting Department

The Department of Local Affairs Accounting Division works closely with the Section 8 staff to approve all financial payments generated concerning the Program. Accounting staff maintains escrow spreadsheets, year-to-date budget spreadsheets, collection payment reconciliation spreadsheets and other tracking mechanisms to assist in maintaining the financial integrity of the program. The year-end and quarterly financial statements are also submitted to REAC by this office.

5. PHA Grievance – 24 CFR Part 903.7**Informal Reviews and Hearings** 24 CFR 982.54(d)(12) and (13)

Families seeking admission to or already participating in the housing choice voucher program have the right to receive an informal review or hearing in most circumstances in which a DOH Section 8 Contractor makes a decision affecting their eligibility or amount of assistance. The purpose of an informal hearing review or hearing is to resolve applicant or participant disputes without legal action and to correct errors that might have occurred in the decision making process. With the exception of decisions related to restrictions on non-citizens, an informal review is for a program applicant and an informal hearing is for program participants. Decisions related to restrictions on assistance to non-citizens always require an informal hearing regardless of whether the family is an applicant or a participant. HUD-50075 (2008)

Notice of Rights

The notice must contain the following information:

1. A brief statement of reasons for the decision;
2. A statement that if a family does not agree with the decision, the family may request an informal review or informal hearing; and
3. The deadline for the family to submit its request to the Contractor (10 days from notice)

Upon receiving the family's request the DOH Section 8 Contractor must proceed with the informal review or informal hearing in a reasonable expeditious manner.

Circumstances Which Require the Offer of an Informal Review

1. A determination of the family's annual or adjusted income, and the use of such income to compute the housing assistance payment.
2. A determination of the appropriate utility allowance for tenant –paid utilities.
3. A determination of the family unit size under the subsidy standards.
4. A determination that a family is residing in a unit with a larger number of bedrooms than appropriate for the family unit's size under the subsidy standard, or the determination to deny the family's request for exception for the standard.
5. A determination to terminate assistance for the participant family because of the family's actions or failure to act.
6. A determination to terminate assistance because the participant has been absent from the assisted unit for longer than the maximum period permitted.
7. Determinations to terminate the family's Family Self- Sufficiency contract, withhold supportive service, or propose forfeiture of the family's escrow account.
- 8.

An informal review is not required for decisions concerning:

1. Determination of unit size under DOH's subsidy standards;
2. Determination that a unit does not meet or comply with HQS;
3. Denial of a request to extend or suspend voucher term;
4. General policy issues or grievances;
5. Discretionary administrative determinations;
6. Refusal to grant approval of the tenancy.

In all other circumstances a program applicant has an opportunity for an informal review of a decision when the applicant requests it.

An informal hearing is not required for the following:

1. Determination that a unit does not comply with HQS;
2. Refusal to extend or suspend a voucher term;
3. Discretionary administrative determination;
4. General policy issue or grievance;
5. How the utility allowance schedule is established;
6. Refusal to approve a unit or tenancy;
7. Determination that a unit does not meet HQS due to family; size or change in family composition;
8. A determination to exercise or not to exercise any rights or remedy against the owner.

The decisions regarding the following determinations require that a program participant be given an opportunity for an informal hearing:

1. Determination of the family's annual or adjusted income;
2. Calculation of total tenant payment;
3. Determination of appropriate utility allowance schedule;
4. Determination of termination of assistance;
5. Determination of unit size for participants under the DOH subsidy standards;
6. Denial of hardship exemption to the minimum rent requirement;
7. A determination to terminate assistance for the participant family because of the family's actions or failure to act;
8. A determination to terminate assistance because the participant has been absent from the assisted unit for longer than the maximum period permitted;
9. Determinations to terminate the family's Family Self Sufficiency contract, or propose forfeiture of the family's escrow account.

Hearings to Consider a Determination of Ineligible Immigration Status

Whenever there is a determination of ineligible immigration status, the DOH Section 8 Contractor must offer an applicant or participant family the opportunity to request an informal hearing within 30 days of receipt of the ineligibility determination from the U.S. Immigration and Naturalization Service (INS), or the delay of the decision, terminate, or denial of assistance.

The DOH Section 8 Contractor must keep all denial or termination of assistance documents related to immigration status for a minimum of five years. These include any applications for initial or continued assistance.

Timing of Informal Hearings

In cases where the decision is termination or to reduce a family's assistance, a notice must be sent which explains the reason for the decision and provides the family the opportunity to request an informal hearing prior to the terminating or reducing assistance.

The following changes may be implemented prior to the informal hearing:

1. Changes in total tenant payment or family share;
2. Denial of a new voucher for a family that wants to move; or
3. Unit size determinations for a family that wants to move.

Informal Review or Hearing Process

Any staff person from the DOH Section 8 Contractor's agency may conduct an informal review, other than the person who made or approved the decision under review.

The program applicant must be given an opportunity to present written or oral objections to the decision. The applicant must be notified of the final decision after the informal review, including a brief written statement of the reasons for the final decision.

Informal Hearing Process

An informal hearing is conducted by a hearing officer appointed by the Executive Director of the DOH Section 8 Contractor agency. The hearing officer may be any person designated by the Director, with exception of the person who made or approved the decision under review.

Before the hearing the family must be given the opportunity to examine the documents directly relevant to the hearing. The family must be allowed to copy any such documents at the family's expense. The DOH Section 8 Contractor is also given the opportunity to examine any family documents that are directly relevant to the hearing and may copy at their own expense.

Representation and Evidence

The family is entitled to representation by a lawyer or other spokesperson at its own expense. Both sides must be given the opportunity to present evidence, and each may ask questions. The person that conducts the hearing must issue a written decision that briefly states the reasons for the decision. Factual determinations relating to the individual circumstances of the family shall be based on a "preponderance of the evidence" presented at the hearing. A copy of the hearing minutes must be promptly furnished to the family.

DOH is not bound by a decision made at an informal hearing that is contrary to HUD regulation or requirements, or otherwise contrary to federal, state or local law.

6. Family Self-Sufficiency Program

The Family Self-Sufficiency (FSS) program is an integral part of DOH's efforts to assist families to attain and sustain self-sufficiency. It encourages communities to develop local strategies to help families obtain economic independence. The FSS program is designed to provide participants with access to supportive services and resources needed to develop and maintain self-sufficiency, working with job training, job placement, child care, transportation, case management, educational opportunities, recreation, substance and alcohol abuse, budgeting, life skills and homeownership counseling. The primary goal is to support families making the transition from welfare to work.

The mission of DOH FSS program is to bring low-income families into increased economic self-sufficiency, to foster independence from public assistance, and to promote a better quality of life. The FSS program coordinates with community supportive service agencies and the private sector to provide an innovative program, which enables low-income families to:

1. Achieve economic independence
2. Break the cycle of dependence on government programs
3. Participate in counseling workshops and support groups
4. Work with a case manager to develop and achieve FSS goals
5. Become skilled and reliable employees
6. Retain the support needed to transition into self-sufficiency
7. Overcome the barriers to self-sufficiency

DOH Contractors work with Department of Human Services, schools, businesses and other local partners to develop a plan that gives families the skills and experience to enable them to obtain employment. The FSS Coordinators ensure that families are linked to supportive services needed to achieve their goals. Several DOH contractors have entered into cooperative agreements with TANF and other supportive service agencies (as listed in the table below), to share information and/or target supportive services (as contemplated by section 12(d) (7) of the Housing Act of 1937). Funding for TANF is provided to each county based on a formula basis and each county develops a plan for the use of their funds.

Coordination efforts between DOH, TANF and other supportive social service agencies include:

- Client referrals
- Information sharing regarding mutual clients (i.e. rent determinations)
- Coordination of the provision of specific social and self-sufficiency services and programs
- Partnering to administer self sufficiency program providing supportive services and resources
- DOH will require that Housing Agencies under contract to demonstrate coordination efforts before participants in that jurisdiction can participate in the Family Self Sufficiency and Home Ownership Programs.

Economic and Social Self-Sufficiency Programs

The following agencies have entered into the agreements with services agencies to enhance the economic and social self- sufficiency.

	ALAMOSA COUNTY	ELBERT COUNTY	CHAFFEECUSTER, FREMONT, PARK & TELLER COUNTY	GUNNISON COUNTY	LA PLATA COUNTY	LOGAN COUNTY	SAGUACHE COUNTY	YUMA and WASHINGTON COUNTIES	MONTROSE COUNTY
TANF	X	X	X	X	X	X	X	X	X
DOLE	X	X	X	X	X	X	X	X	X
Family Crisis			X						
Local Community College	X		X						
Cooperative Extension				X					
Watershed District				X					
Consumer Credit Counseling					X				
Mental Health Center	X				X				
Resource & Other Center(s)	X	X		X	X			X	X
Rural Development	X	X							
Local Health Dept	X		X	X					
County Gov't			X	X		X		X	X

Family Self Sufficiency Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (As of: 01/01/11)	Actual Number of Participants (As of: 01/01/11)
Public Housing Section 8	N/A 96	N/A 96

The most recent FSS Action Plan addresses the steps DOH plans to take to achieve at least the minimum program size.

Welfare Benefit Reductions

DOH is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by:

- Establishing or pursuing a cooperative agreement with all appropriate TANF and supportive and social service agencies regarding the exchange of information and coordination of services
- Establishing a protocol for exchange of information with all appropriate TANF and supportive and social service agencies
- Establishing a protocol for exchange of information with agencies that provide direct services providers, e.g.: entering into memorandums of understanding or service agreements.

9. Civil Rights Certification

Civil rights certification is included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations. This certification can be viewed at the main PHA office and is listed as supporting documentation. 24 CFR Part 903.79(o)

9.Fiscal Year Audit

DOH is not required to have an audit conducted under section 5(h) (2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c (h))

10. Violence Against Women Act (VAWA)

DOH has adopted a policy to implement the Violence Against Women and Department of Justice Reauthorization Act of 2005 which limits the rights of owners and Housing Agencies to terminate tenancy or program assistance. An owner or Housing Agency may not consider incident(s) of actual violence, or stalking as (1) a serious or repeat violation of the lease by the victim (2) other good cause for terminating the tenancy or assistance (3) criminal activity justifying the termination of the tenancy or assistance.

VAWA affords certain protection to an applicant or participant who is or has been a victim of domestic violence, dating violence, or stalking. The act says that one of the previously mentioned criteria is not an appropriate basis for denial of program assistance or for denial of admission of an otherwise qualified applicant. Therefore, DOH will not deny assistance or terminate assistance to an individual who is or has been a victim of domestic violence, dating violence or stalking because of charges or information linked to that violence. All applicants are briefed upon entry to the program regarding the protections under VAWA. Additionally, each termination notice informs tenants of their ability to declare protection under VAWA if applicable. DOH will work with each individual victim to identify agencies, activities, services or programs that may be available to help children and adult victims of domestic violence, dating violence, sexual assault, or stalking to enhance victim safety and to maintain housing.

DOH strives to serve the needs of children and adult victims of domestic violence, dating violence and stalking as defined in VAWA. DOH will continue to develop policies and procedures as needed to implement the requirements of VAWA and to collaborate with agencies to prevent and respond to domestic violence.

11. Identify all PHA Plan elements that have been revised by the PHA since its last Annual Submission:

Please see below:

HOUSING CHOICE VOUCHER COLLECTIONS POLICY

Section 1: Division of Housing Section 8 Contractors Regulations and Rules

HAP Repayments:

1. The Division of Housing (DOH) Section 8 Contractor will identify that a HAP overpayment has occurred and is required to promptly contact the landlord or tenant to inform them of the overpayment. Within 30 days of identifying the overpayment, the Section 8 Contractor is required to complete and obtain a signed repayment agreement (Attachment A).
2. The landlord or tenant is required to submit a check or money order for the total amount due within 30 days, unless, other arrangements have been made and authorized by DOH. In some cases, DOH may retain a portion or the total amount due for the following month's HAP payment.
3. In the event that the landlord or tenant, fail to submit the required payment within 30 days, the Section 8 Contractor is obligated to treat this as a collection or fraud account and take the following action.

Fraud and Collection Repayments:

4. The Division of Housing (DOH) Section 8 Contractor will identify that a HAP overpayment has occurred and is required to promptly contact the landlord or tenant to inform them of the overpayment. Within 30 days of identifying the overpayment, the Section 8 Contractor is required to complete and obtain a signed repayment agreement (Attachment A).
5. The Section 8 Contractor will set up a repayment agreement. A repayment agreement owing less than \$1,000 is limited to a maximum of a 12-month period. A repayment agreement exceeding \$1,000 is limited to a maximum of a 36-month period. In the event, that the total amount due **can not** be paid within the maximum time period, authorization by DOH is required. The repayment agreement must include the following information: Participant's phone number, physical address, mailing address, social security number, tenant ID number, total balance due, and any payments which may have been collected prior to submitting to DOH. In addition, hard copies of the checks and money orders collected must also be included. **CASH RECEIPTS FROM LANDLORD OR TENANTS ARE NOT ALLOWED.** Please note; Tenant Utility Reimbursement Payments (URP) will not be intercepted and applied towards repayment agreements, unless the tenant defaults on their payments.
6. Once the overpayment is identified and a repayment agreement is created and signed by both the Section 8 Contractor and the landlord or tenant, the Section 8 Contractor is obligated to prepare and submit a collection packet to the Division of Housing. The collection package must contain the following documentation: Signed Repayment Agreement, the 50058 HUD Form, and all other supporting documentation to justify the total amount due.
7. Payment(s) must be submitted on a monthly basis **directly** to the Division of Housing at the following address: (Payment are NOT to be submitted to the Section 8 contractor/Housing Authority)

Colorado Department of Local Affairs
Division of Housing
Attention: Section 8 Collections
1313 Sherman Street, Room 500
Denver, CO 80203

8. Violation of a repayment agreement will result in the following: Termination of the program **unless** the following action is taken: 1. Payment is received by DOH within 30 days to bring the debt current (Payment agreement must be adhered to with no further violations, 2) Set-up other repayment arrangements with DOH Collection Staff. If alternate or revised arrangements are made due to unforeseen circumstances which DOH has deemed eligible, DOH may elect to perform one or more of the following: 1) Defer payments for a specified amount of time and extend the term, 2) Restructure the repayment agreement to adjust the amount of monthly payment due.
9. If the above conditions are not met, and the participant is still in violation of the repayment agreement, DOH will assume the following actions: DOH will proceed with the first attempt to deliver a Certified Notice of Collection to the participant at their last known address. If the Notice of Collection is returned to DOH with no forwarding address the participant will be turned over to the State Collection Services. All collection letters will be sent as a USPS certified letter and Division of Housing will allow a total of two attempts of notification. If participant does not respond within 30 days of the second notice, participant will be considered in violation of their repayment agreement and will be sent to the State of Colorado Central Collection Services without further a due.
10. Section 8 Contractor must comply with the Enterprise Income Verification EIV Requirements and complete and submit (Attachment B) plus all supporting documentation to DOH. The Division of Housing EIV Coordinator will assume a central role in reviewing Attachment B and supporting documents for validity. DOH will assume the responsibility of submitting the information to the Enterprise Income Verification system (EIV).

Section 2: Division of Housing Regulations and Rules

11. DOH will submit the participants file to DOLA Accounting Department for submission to the State Collection Services.
12. The Division of Housing EIV Coordinator will assume a central role in reviewing Attachment B and supporting documents for validity. DOH will assume the responsibility of submitting the information to the Enterprise Income Verification system (EIV).
13. DOH will retain and track a record of all debts owed until a final disposition is received from accounting. This information will be cross referenced periodically against other databases which will include ECS, PIC, and the EIV system.
14. By the 15th of each month, DOH will send each Section 8 Contractor the status of their corresponding participants. This information will include the amounts that have been collected, and the outstanding balances. For

Outgoing and Incoming Portables, both the Initiating Housing Authority and the Receiving Housing Authority will receive the status reports.

**Partial Month HAP Payment Agreement
For Mid-Month Lease ups** (Effective 10/01/2010)

Monthly HAP amount X 12 months / 365 days X number of days in the unit = Partial month HAP payment

Example: \$1000.00 X 12 / 365 X 26 days = \$854.79 round to \$855.00

- (Always use 365 days as the standard rule)
- (Include the day they move into the unit)
- (.0-.50 round down, .51-.99 round up)

Move in date: ____/____/____

\$_____ X 12 months / 365 days X _____ days in unit = \$

I _____ (*Landlord*) have read and understand the Partial Month HAP payment terms implemented by The Department of Local Affairs – Division of Housing (DOH). I am aware that the Division of Housing will pay the partial month HAP payment as indicated above.

_____ I concur with the HAP rent calculation and **will not** charge the tenant an amount in excess of the Partial Month HAP payment of \$_____.

_____ I do not concur with the HAP rent calculation and **will charge** the tenant \$_____ in excess of the Partial Month HAP payment.

Signature

Date

I _____, (*Tenant*) have read and understand the Partial Month HAP payment terms implemented by The Department of Local Affairs – Division of Housing (DOH). I am aware that the Division of Housing will pay the partial month HAP payment as indicated above.

_____ I agree with the HAP rent calculation and understand that the landlord **will not** charge an amount in excess of the Partial Month HAP payment of \$_____.

_____ I am aware that the landlord does not agree to the Partial Month HAP payment terms and I agree to pay \$_____ in excess of the Partial Month HAP payment.

Signature

Date

Interim Reexamination 24 CFR 982.516

Overview

Family circumstances change throughout the period between annual reexaminations. This section will outline the information about changes in the family circumstances that must be reported and under what circumstances DOH must process interim reexaminations to reflect those changes. HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition changes.

New Family Members Not Requiring Approval

The addition of a family member as a result of birth, adoption, or court-awarded custody does not require DOH approval. However, the family is required to promptly notify the Section 8 Contractor of the addition 24 CFR 982.551(h) (2). The family must inform the DOH Contractor of the birth, adoption or court-award custody of a child within 15 business days.

New Family and Household Members Requiring Approval

The family must request the DOH Section 8 Contractor approval to add a new family member or other household member. 24 CFR 982(h) (2) and 24 CFR 982.551(h) (4).

When any new family member is added, a reexamination to determine any new income or deductions associated with the additional family member, and to make appropriate adjustments in the family share of the rent and the HAP payment CFR 24 982.516(e).

If a change in family size causes a violation of the Housing Quality Standards (HQS) space standards, the DOH Section 8 Contractor must issue a new voucher, and the family must try to find a unit with the required number of bedrooms as soon as possible. If an acceptable unit is available for rental by the family, the DOH Contractor must terminate the HAP contract in accordance with its terms 24 CFR 982.403.

Changes Affecting Income or Expenses

DOH will conduct interims for the following circumstances:

1. For families receiving the Earned Income Disallowance (EID), the interim reexamination at the start and the conclusion of the second 12 month exclusion period (50% phase in period).
2. For families that are participating in the Family Self Sufficiency Program.
3. If the family has continued to report zero income, an interim reexamination will be conducted when they have an increase in income.
4. If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (seasonal or cyclic income), the interim reexamination to coincide with the end of the period for which it is feasible to project income.
5. DOH Contractor will conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint.
6. DOH Contractor will conduct an interim reexamination at any time the Housing Assistance Payment changes in the amount of \$250.

7. The family is permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination.

*****All interims must be noted on the 50058 as to what the circumstance was that prompted the change.***

Family Initiated Interim Reexamination

The family is permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination 24 CFR 982.516(b) (2).

Families are required to report all increases in earned income, including new employment, within 15 days. The DOH Section 8 Contractor will make note of the information in the tenant file, but will not conduct an interim reexamination. The increase in income will be calculated into the next annual reexamination, unless that HAP amount changes in the amount of \$250.00.

Effective Dates

If a family share increases it will be effective the first of the next month following 30 days notice to the family.

If a family fails to report a change within the required time frames, or fails to provide all required information within the required time frames, the increases will be applied retroactively, to the date it would have been effective had the information been provided on a timely basis. The family will be responsible for any overpaid subsidy and must enter into a repayment agreement.

If the family income decreases it will be effective the first day of the month following the reported change and all required documentation was submitted. In cases where the change cannot be verified until after the date and the change would have become effective, the change will be made retroactively.

Changes in Payment Standards and Utility Allowances

Payment Standards 24 CFR 982.525

The family share or the rent and HAP calculations must use the correct payment standard for the family; taking into consideration the family size, the size of the unit, and the area in which the unit is located.

When the payment standards are released by HUD or the family's situation changes, new payment standards are applied at the following times:

1. If the payment standard amount changes during the term of the HAP contract, the date on which the new standard is applied depends on whether the standard has increased or decreased:
 - a. If the payment standard amount has increased, the increased payment standard will be applied at the first annual reexamination following the effective date of the increase in payment standard.
 - b. If the payment standard amount has decreased, the decreased payment standard will be applied at the second reexamination following the effective date of the decrease in the payment standard.

2. If the family moves to a new unit, or a new HAP contract is executed due to changes in the family lease (even if the family stays in place) the current payment standard applicable to the family will be used when the new HAP contract is processed.

Subsidy Standards 24 CFR 982.505(c) (4)

If there is a change in the family unit size that would apply to a family during the HAP term, either due to a change in the family composition, or a change in the PHA's subsidy standards, the new family unit size must be used to determine the payment standard amount for the family at the family's first annual reexamination following the change in family unit size.

Utility Allowance 24 CFR 982.517(d)

The family share of the rent and HAP calculations must reflect any changes in the family utility allowance schedule.

When there are changes in the utility arrangement with the owner, the utility allowances in effect at the time of the new lease and HAP contract are executed.

The new utility allowance schedule will be applied to the family's rent and subsidy calculation at first annual reexamination, after the utility allowance schedule is adopted.

Notification of New Family share and HAP Amount

The DOH Section 8 Contractor must notify the owner and the family of any changes in the amount of the HAP payment. The notice must include the following:

1. The amount and the effective date of the new HAP payment
2. The amount and effective date of the new family share or the rent
3. The amount and effective date of the new tenant rent to owner
4. The family must be given an opportunity for an informal hearing regarding the determination of their annual adjusted income, and the use of such income to compute the housing assistance payment. 24 CFR 982.555(a) (1) (i).

The notices to the family will include the annual and adjusted income amounts that were used to calculate the family share of the rent and the housing assistance payment; in addition the notice will state the procedures for requesting an informal hearing.

Waiting List - Order of Selection

DOH has established preferences, and gives priority to serving families that meet those criteria. The system of preferences may select families from the list of priorities and the according to the date and time of the application.

1

Families that include victims of homelessness
Families that include victims of domestic violence
Families that include victims of natural disaster

2

Families that include a person with a disability
Families currently enrolled in education, training or upward mobility programs
Families currently working:
An applicant shall be given the benefit of the working family preference if the head and spouse, or sole member is age 62 or older, or is a person with disabilities.
Families currently participating in DOH TBRA or TANF Program
Families currently on the HPRP waiting list or program

3

Date and Time

The family has a number 1 because they are homeless and a number 3 based on date and time of their application and another family has a number 2 because a family member is currently enrolled in an educational training, and a number 3 based on the date and time of application. The DOH Contractor will process the application with the preference numbers 1 and 3, even if the application with the numbers 2 and 3 was received earlier.

DOH also gives equal weight to the preferences, which means that having more than one preference does not boost a family higher on the list.

If a family qualifies for more than one selection preferences, such as a 1 because they are homeless, a 2 because they are a family enrolled in an educational or training program, and a 3 based on the date and time of the application, and another family member has a number 1 because they are homeless, and a 3 based on the date and time, the Contractor will process whichever application was received first.

Attachment C

Home Ownership and Project Based Voucher

1. Home Ownership

On October 30, 2000, the U S Department of Housing and Urban Development (HUD), released Federal Register Part IV, 24 CFR Parts 5, 903, and 982, making the creation of the Section 8 Home Ownership Voucher program final. That Final Rule went into effect on November 15, 2000.

The Colorado Division of Housing (DOH) added basic guidelines to the 2000 Annual Plan for how to take part in the Home Ownership opportunity. For those agencies¹ that contract with the DOH for rental vouchers, this presented an opportunity to take part in the national plan that allows Section 8 vouchers to be used for first time home owners in Colorado.

On October 18, 2002 the U.S. Department of Housing and Urban Development (HUD) released Federal Register Part II, 24 CFR Part 982, creating the final rule of the Section 8 Homeownership Program. DOH has been operating the Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982. DOH initiated a Section 8 Home Ownership Program providing eligible families the option of using their voucher toward the purchase of a home.

The homeownership program is limited to families who are eligible under terms expressed in DOH's guidebook. In order to be eligible, a family must be a voucher holder for one year and live in that jurisdiction for a minimum of 12 months, be in good standing and not pay more that 30% of their adjusted income initially towards their total home ownership expense including: principal, interest, insurance, mortgage insurance, home owners association fees, maintenance, repair and utility allowance. Each DOH contracting agency may establish a policy of performing an annual HQS inspection for the duration of the homeownership assistance. It is the responsibility of the contractor to assess the need for the annual HQS inspection.

DOH has demonstrated capacity to administer a Home Ownership Program as evidenced by the 65 families that have successfully purchased a home using their Section 8 assistance.

2. Project Based Vouchers

The Colorado Division of Housing (DOH) reserves the right to allocate up to 20 percent of its Section 8 Housing Choice Vouchers for the potential use under the Section 8 Project Based Vouchers Assistance Program. The proposed units may be located throughout DOH's jurisdiction. This potential reallocation of the Section 8 Project Based Assistance is consistent with DOH's Agency Plan and goal of providing quality affordable housing to low income families and will increase housing choices for these families. The locations will be consistent with goals of de-concentrating poverty and expanding housing and economic opportunities in accordance with HUD and the DOH Section 8 Administrative Plan. Project basing is being pursued to compliment the goal to end homelessness and link supportive services to housing.

DOH currently administers 25 units of project based voucher assistance to Veterans. DOH is exploring options for providing additional project based units for housing choice voucher participants in need of additional support in the community.

DOH has applied to HUD for 16 project based vouchers under the set a side funding availability for project basing HUD Veterans Affairs Supportive Housing Vouchers. This program is located in Pueblo and is focused on homeless veterans with disabilities.

Attachment D

9.0 Housing Needs

1. Housing Needs of Families in the Jurisdictions Served by the PHA

Based on the information and research completed and provided by the Consolidated Plan, information provided by HUD and other available data, DOH has identified the housing needs of low income households in Colorado, including elderly, disabled and homeless. The housing needs include and address the affordability, supply, quality, accessibility and size of units, location of units and the availability of supportive services.

A. Shortage of affordable housing for all eligible populations.

1. Maximize the number of affordable units available to the PHA within its current resources by:

- Maintain or increase Section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction.
- Maintain or increase Section 8 lease-up rates by providing technical assistance to DOH contractors in successful techniques in marketing the program to owners, particularly those outside of areas of minority and poverty concentration.
- Maintain or increase Section 8 lease-up rates by providing information to owners once a year through a "Landlord Newsletter."
- Maintain or increase Section 8 lease-up rates by providing technical assistance to DOH contractors in effectively screening Section 8 applicants to increase owner acceptance of program.
- Undertake measures to ensure access to affordable housing among families assisted regardless of unit size required.
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies.

2. Increase the number of affordable housing units by:

- Applying for additional Section 8 units should they become available from HUD.
- Leveraging affordable housing resources in the community through the creation of mixed - finance housing.
- Pursuing housing resources other than public housing or Section 8 tenant-based assistance to increase affordable housing rentals.
- Continuing to assist other funding entities to increase annual statewide production of affordable rental units.
- Pursue other resources to provide affordable housing and services
- Continue the implementation of the Section 8 Homeownership program and Project Based Section 8 Voucher Program.

B. Specific Family Types: Families at or below 30% of area median income

1. Target available assistance to families at or below 30 % of AMI

- Meet HUD federal targeting requirements for families at or below 30% of AMI in tenant-based Section 8 assistance.
- Employ admissions preferences aimed at families with economic hardships.
- Adopt policies to support and encourage linking housing to services.

C. Specific Family Types: Families at or below 50% of area median income

1. Target available assistance to families at or below 50% of AMI
 - Employ admissions preferences aimed at families who are working.
 - Adopt policies to support and encourage linking community services, increase community involvement and improve support for self-sufficiency efforts.

D. Need: Specific Family Types: The Elderly

1. Target available assistance to the elderly:
 - Apply for special-purpose vouchers, should they become available, targeted to the elderly.
 - Apply the same admission preference for elderly families as for those who are working toward self-sufficiency.

E. Specific Family Types: Families with Disabilities

1. Target available assistance to families with disabilities:
 - Apply for special-purpose vouchers, should they become available, targeted to families with disabilities.
 - Encourage and provide guidance to contractors to affirmatively market to local non-profit agencies that assist families with disabilities.
 - Continue to develop partnerships and work with independent living centers and disability groups throughout the state to provide rental assistance to those with disabilities.
 - Apply the same admission preference for disabled families as for those who are working toward self-sufficiency
 - Provide landlord training and outreach.

F. Specific Family Types: Families who are homeless or displaced due to domestic violence or a natural disaster.

1. Target available assistance to Homeless Families or those displaced due to domestic violence or a natural disaster:
 - Apply for special-purpose vouchers, should they become available, targeted to families who are homeless or those displaced.
 - Encourage and provide guidance to contractors to affirmatively market to local non-profit agencies that assist families who are homeless, and/or displaced due to domestic violence or a natural disaster.

G. Specific Family Types: Races or ethnicity with disproportionate housing needs to affirmatively further fair housing

1. Increase awareness of PHA resources for families of race and ethnicity with disproportionate needs:
 - Encourage and provide guidance to contractors to affirmatively market to races/ethnic groups shown to have disproportionate housing needs.
 - Counsel families as to the location of areas of poverty concentration and assist them to locate those units outside those areas.
 - Market the Section 8 Program to owners outside of areas of poverty concentration

2. Housing Needs of Families on the Section 8 Tenant Based Assistance Waiting List

Public Housing Authorities (PHAs)

The Colorado Division of Housing (DOH) conducts an annual statewide public housing authority survey to assess the number of families on Colorado's PHA waiting lists. The survey is a snapshot in time, indicating that in January 2011, 49,757 families were waiting for PHA rental assistance. It should be noted that the total number of households on waiting lists is not necessarily an accurate measure of need since many lists are closed, capped or may have ineligible households at any given time. What we do know is that there is not enough deep-subsidy rental assistance available to the lowest income renters in Colorado.

The majority of households on Colorado PHA waiting lists have incomes at or below 30 percent of area median income for the state. This is consistent with prior years' surveys. Most are families with children, while 16,125 have a family member who is disabled. Those housing authorities that track the statistic average 35 phone calls per week for housing assistance.

See following table for breakdown.

Statewide Public Housing Waiting List Survey Results, 2011

Demographics Category	Number of People on Wait Lists
Total Waiting List for Households	49,757
0 – 30% AMI	43,140
31 – 50% AMI	5,687
51 – 80% AMI	930
Families with Children	24,017
Elderly Families	6,381
Families with Disabilities	16,125
Hispanic	15,899
Non-Hispanic	33,858
Black	9,683
Native American	703
Asian Pacific	2,160

Attachment E

Strategies for Addressing Housing Needs

Strategic Plan Strategies, Goals, Objectives and Outcomes

DOLA'S HOUSING STRATEGIES					
DOLA Strategy	DOLA Priority	HUD Program Goal	HUD Objective	HUD Outcome Statement	DOLA Annual targeted production of units
Preserve the existing statewide supply of affordable rental or home-ownership housing.	High	Decent Housing	Availability	Accessibility for the purpose of providing decent housing	<i># units of existing affordable rental housing preserved</i> Benchmark: 348 <i># units of homeownership preserved</i> Benchmark: 140
Increase the statewide supply of affordable "workforce" rental housing and home-ownership in high need areas.	Medium	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	<i># rental units created</i> Benchmark: 425 <i># homeownership opportunities created for high-need areas</i> Benchmark: 190
Increase the capacity and stability of local housing and service providers statewide.	Medium	Decent Housing	Sustainability	Sustainability for the purpose of providing decent housing	<i>Provide CHDO operating funding equal to 5% of HOME allocation</i> Benchmark: 100%
Increase statewide pre-purchase homeownership counseling for low/moderate income and minority households.	Medium	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	<i>#homeownership pre-purchase counseling programs for low/moderate income and minority households</i> Benchmark: 10 programs
Meet community needs for the homeless through supportive services and appropriate housing.	High	Suitable Living Environment	Availability	Accessibility to provide a suitable living environment	<i># homeless and transitional housing beds</i> Benchmark: 10
Increase statewide supply of housing for persons with special needs coupled with services that increase or maintain independence.	High	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	<i># of special needs units coupled with services</i> Benchmark: 95 units <i># of persons with HIV/AIDS maintaining housing stability</i> Benchmark: 90
Provide rental subsidies statewide for low-income households who would otherwise pay more than 30% of their household income for housing	Medium	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	<i># rental subsidies provided for low-income households</i> Benchmark: 140 households
Project base Section 8 vouchers to provide a revenue source for housing units and HOME and CDBG funding to fill gaps in development of units for the homeless and disabled populations	High	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	<i>Project-base at least 50 Section 8 Vouchers.</i>
Assist low-income renters and owners with energy-efficiency upgrades.	Medium	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	<i># energy efficiency upgrades assisted</i> Benchmark: 75% of units will meet or exceed Energy Star
Ensure the statewide safety and habitability of factory built/manufactured structures through program services that are efficient and effective.	Medium	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	<i>Reduce commercial and residential plan review turn-around time (days)</i> Benchmark: 15 days <i>Meet manufacturer plant inspection request dates</i> Benchmark: 100%

Attachment G

Required Submission to HUD Field Office Review

Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents:

Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations* (which includes all certifications relating to Civil Rights)

Resident Advisory Board (RAB) comments.
Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.

***No Comments Provided*

**PHA Certifications of Compliance with the PHA Plans and Related Regulations:
Board Resolution to Accompany the PHA 5-Year and Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or ___ Annual PHA Plan for the PHA fiscal year beginning 2011, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.
4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. For PHA Plan that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2006-24);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
11. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
19. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
20. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
21. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
22. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.


Colorado Department of Local Affairs, Division of Housing
PHA Name

CO911
PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 20__ - 20__

Annual PHA Plan for Fiscal Years 2011- 2012

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

Name of Authorized Official Pat Coyle	Title Executive Director, Division of Housing
Signature 	Date 2/11/2011

Civil Rights Certification

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/2011

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing.

Colorado Department of Local Affairs, Division of Housing

CO911

PHA Name

PHA Number/HA Code

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

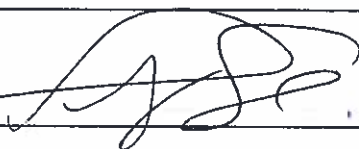
Name of Authorized Official

Pat Coyle

Title

Executive Director, Division of Housing

Signature



Date 02/11/2011

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

**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/2011**

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

I, Lynn Shine the Consolidated Plan Coordinator certify that the Five Year and
Annual PHA Plan of the Division of Housing is consistent with the Consolidated Plan of
Colorado Department of Local Affairs, Division Of Housing prepared pursuant to 24 CFR Part 91.

Lynn Shine 02/11/2011
Signed / Dated by Appropriate State or Local Official