



- Home Ownership Assistance
- Housing Rehabilitation
- Affordable Housing
- Emergency Solutions Grant Program

2020-2024 Consolidated Plan

2020 Action Plan



**Community
Development Division**
9898 E. Colfax Ave., Second Floor
Aurora, CO 80010

SECTION I.

2020-2024 CONSOLIDATED PLAN AND
PY2020 ACTION PLAN

Executive Summary

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

Introduction

This document represents the Five-year Consolidated Plan for the City of Aurora. The Five-year planning period covers the program years (PY) 2020 through 2024. This Plan also contains the One-year Action Plan for PY2020.

The Consolidated Plan is a strategic plan required by the U. S. Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs. This plan supports the proposed use of funds provided by those grant programs. The plan facilitates the City's coordinated effort to review and create strategies to develop affordable housing and support service needs within the community. The Consolidated Plan also sets forth program goals, specific objectives, annual goals, and benchmarks for measuring progress. Progress is reported annually through the HUD-required Consolidated Annual Performance and Evaluation Report (CAPER).

The City of Aurora receives approximately \$2,850,000 in CDBG dollars, \$1,100,000 in HOME and \$250,000 in ESG each year directly from HUD. The five-year plan covers the period from November 15, 2019 through November 14, 2024.

In addition to the Five-year plan, the City of Aurora is required to conduct an Analysis of Impediments to Fair Housing Choice, or AI. This document, which was conducted as a regional study with metro-area jurisdictions, is appended to this Consolidated Plan. Findings from the AI informed the City's Five-year goals.

Background on Block Grant Funds

Community Development Block Grant (CDBG). The goals of the CDBG program are to:

- Provide a suitable living environment; including improving the safety and livability of neighborhoods; increasing access to quality facilities and services; revitalizing deteriorating neighborhoods; restoring and preserving natural and physical features of special value for historic, architectural, or aesthetic reasons; and conserving energy resources.
- Provide decent housing; including assisting homeless persons to obtain affordable housing; preservation of existing affordable housing stock; increasing the availability of permanent housing that is affordable to low income persons without discrimination; and increasing supportive housing that includes structural features and services to enable persons with special needs to live in dignity.
- Expand economic opportunities: including the creation of jobs accessible to low income persons; providing access to credit for community development that promotes long-term economic and social viability; and empowering low income persons to achieve self-sufficiency in federally assisted and public housing programs.

The **HOME Investment Partnerships Program**, or HOME, is the largest federal block grant to state and local governments designed exclusively to create affordable housing for low-income households. The goals of the HOME program are to fund a wide range of activities that:

- Build affordable housing for rent or homeownership;
- Acquire affordable housing for rent or homeownership;
- Rehabilitate affordable housing for rent or homeownership; or
- Provide direct rental assistance to low-income people.

Emergency Shelter Grant. The goals of the ESG program are to:

- Engage homeless individuals and families living on the street;
- Improve the number and quality of emergency shelters for homeless individuals and families;
- Help operate these shelters;
- Provide essential services to shelter residents;
- Rapidly re-house homeless individuals and families; and
- Prevent families and individuals from becoming homeless.

2. Summary of the objectives and outcomes identified in the Plan

The 2020-2024 Consolidated Plan is designed to create a link between the identified needs of Aurora's low to moderate-income and special needs populations and the resources of HUD's Community Development Block Grant (CDBG), Home Investment Partnership (HOME) and Emergency Solutions Grant (ESG) funding and other public/private investments. The Five-year Plan establishes objectives and strategies to address the needs over the next five years in three areas: provide decent housing, provide a suitable living environment, and provide expanded economic opportunities.

The City intends to retail high level goals of continuing neighborhood revitalization efforts; expanding affordable housing; and assisting extremely low income residents, residents experiencing homelessness, and special needs residents with supportive service needs.

To this end, Aurora will continue to build on its successful projects and programs in homeownership and rehabilitation that meet the needs of low and moderate income residents, and will expand its projects and programs for affordable rental options and address homelessness/at-risk of homelessness. Projects selected for funding in the five year period will be managed as efficiently as possible in order to address a wide range of issues that exist in Aurora.

3. Evaluation of past performance

During the last Five-Year Consolidated Plan period, the City's funding allocation focused on preservation of existing affordable housing stock; revitalization of high poverty communities in need of community and economic development; and homeownership attainment for low and moderate income households. These programs have been well received by residents and neighborhood organizations.

The City does not anticipate significant changes to these focus areas in the early years of the new Five-Year Plan. However, as the City of Aurora implements its new **Housing Strategy**, funds may be expended to address the growing needs of severely cost burdened, low-income renter households (i.e. renters that are living near or below the poverty line that are paying more than half of their income on housing, considered "At-Risk"), and address the temporary and permanent supportive housing needs of the City's homeless population.

3. Summary of citizen participation process and consultation process

The Citizen Participation Process was guided by the City's Citizen Participation Plan (CPP). That plan calls for a minimum of two community meetings, held at convenient times and in locations that are accessible to and accommodate persons with disabilities, to include at least one early evening meeting. The Consolidated Plan outreach efforts leveraged those conducted for the Assessment of Fair Housing (AFH) community engagement and the **Housing Strategy**, resulting in a coordinated, creative, and comprehensive approach to citizen participation.

Community meetings. One community meeting was held as part of Aurora GlobalFest, held on the Great Lawn at the Aurora Municipal Complex (AMC), on August 17, between 11 a.m. and 6 p.m. This site offered an opportunity to engage with a diverse group of residents who do not

typically attend community meetings. Information about the Consolidated Plan was available at a dedicated festival booth, and residents had the opportunity to offer their ideas for allocation of block grant funds through interactive prioritization exercises. The choice of GlobalFest for a community meeting meets the CPP goal of: “emphasiz[ing] the involvement of moderate, low, very low, and extremely low income residents in areas where housing and community development funds may be spent...encourage[ing] participation of persons with special needs and/or persons who are often underrepresented in the public process, including minorities, non-English speaking/Limited English Proficiency (LEP) persons, persons with disabilities, and persons who are or are at risk of becoming homeless.”

Another community meeting was conducted at the Village Exchange Center, as part of the development of the Analysis of Impediments in 2018. This interactive community and neighborhood celebration and discussion of needs was attended by more than 150 residents representing many cultures, traditions, languages, family types, and races and ethnicities. Translations were offered in Spanish, Somali, Pashtun, Burmese, French, and Kareni.

Needs of public housing residents were collected through a focus group and surveys conducted in 2018 in concert with development of the Assessment of Fair Housing (AFH). The City of Aurora also notified the Aurora Housing Authority about the Consolidated Plan activities and provided the PHA with requested data and required for the PHA Plan.

The community meetings were guided by the content prescribed in the CPP, which states that the community meetings should address and respond to comments on: 1) The Assessment of Fair Housing (AFH); 2) housing and community development needs; 3) expected amount of federal funding (grant funds and program income) and the development of proposed activities; and 4) review of proposed uses of funds and amount benefiting low-and moderate-income persons; 5) where and how to access the draft Five-Year Plan.

Consistent with the CPP, translations were available upon request and reasonable accommodations were made with a 48 hour advance notification.

Altogether, the public meetings conducted to support this plan included:

- Meeting with public housing residents held at an Aurora Housing Authority property;
- Engagement with more than 500 residents to gather input on needs at the City's Annual GlobalFest event (activities in Spanish and English);
- Meeting with residents at the Village Exchange Center (translators of seven different languages available).

Stakeholder consultation. A community meeting was conducted during development of the Five-Year Plan on August 2, 2019 with key stakeholders. The purpose of that meeting was to discuss the primary housing and supportive service needs of low income and special needs residents.

The City Planning Department conducted nine focus groups with stakeholders as part of the development of the city's **Housing Strategy**. These focus groups discussed housing challenges in Aurora and explored solutions to those challenges, which included the allocation of HUD block grants. Relevant findings from those focus groups is included in this Five-Year Plan.

Aurora stakeholders were also represented in focus groups during 2018 to discuss challenges in housing, employment and job training, and access to opportunity for persons with disabilities. Findings from these focus groups were used in development of both the AI and Consolidated Plan.

Altogether, more than 10 focus groups with stakeholders were conducted.

Resident survey. During 2018, a survey of Aurora residents was conducted to gather information on housing challenges and barriers to economic opportunity. The survey was available online and in hard copy form in Amharic, Chinese, English, Korean, Russian, Spanish and Vietnamese, as were the promotional flyers for the survey. The survey was distributed through social service networks, ethnic restaurants, day labor sites, and churches in Aurora.

The surveys and promotional flyers included contact information to request a reasonable accommodation for residents with a disability, and the online survey system used is Section 508 compliant. An Aurora resident who is deaf requested the assistance of an ASL interpreter to participate. The consultant provided the interpreter and conducted the survey with the resident in person.

Altogether, nearly 800 surveys were received from residents living in Aurora.

Public hearings and comment period. The 30-day public comment period ran from October 1 through October 31, 2019. During this period, comments on the draft plan were invited from residents and stakeholders and accepted verbally at public hearings and in written form by email and regular mail.

Four public hearings were held throughout the development of the Five-Year Consolidated Plan and 2020 Action Plan. Three were held before the public comment; one was held during the public period. These were held on July 9, July 16, September 10, and October 8.

5. Summary of public comments

Public comments will be summarized here and appended to the Final Plan, after they are collected during the 30-day comment period. .

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

All comments and views were accepted.

7. Summary

This supplemental section contains a summary of findings from the Analysis of Impediments to Fair Housing Choice (AI), conducted in 2018.

Aurora ranked the same as the region in the housing challenges measured by resident responses to the AI survey, except for barriers to accessing rental units created by criminal history. Similarly, Aurora residents with disabilities did not indicate their barriers were higher or lower than residents in the region overall.

The two areas where Aurora residents face the most barriers are in:

- Displacement caused by investors selling rental units. This was much higher than in the region and in any other jurisdiction; and
- Concerns about safety in affordable housing communities and surrounding neighborhoods.

Specific action items developed to address the fair housing barriers identified in the AI are incorporated into this Consolidated Plan and include:

- Add affordable housing to the market. Prioritize housing that accommodates families (larger units). Implement policies that produce 100 affordable housing units from HOME funds on an annual basis. Collaborate with housing developers to ensure they have strong affirmative fair housing marketing plans and accommodate families and seniors.
- Continue to fund the City's Home Improvement Loan Program that helps low-income homeowners and property owners. Assist no less than 76 units annually with rehabilitation and improvements through the City program and/or minor home repair programs.
- Explore an expanded program to "buy down" the cost of Market Rate units created by the private market and which are not affordable to persons at or below 60 percent Area Median Incomes. In 2019, the HOME Tenant Based Rental Assistance program is expected to give low income residents access high economic opportunity environments. Assist approximately 8-10 households annually.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The Community Development Block Grant (CDBG), Home Investment Partnerships program (HOME) and Emergency Solutions Grant (ESG) are all administered by the City of Aurora’s Community Development Division (CD) within the Neighborhood Services Department.

Agency Role	Name	Department/Agency
CDBG Administrator	AURORA	Community Development Division (CD)
HOME Administrator	AURORA	Community Development Division (CD)
ESG Administrator	AURORA	Community Development Division (CD)

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

Neighborhood Services Department | City of Aurora, Colorado
office 303.739.7000 | fax 303.739.7939



PR-10 Consultation - 91.100, 91.200(b), 91.215(I)

1. Introduction

The Consolidated Plan goals will be executed by City staff and through partnerships with local nonprofit organizations and the Aurora Housing Authority.

City staff provides two major in-house housing programs: rehabilitation and homeownership assistance.

Staff from the Community Development Division participate in the following committees and partnerships, which are comprised in part of representatives from public and private housing, health, and social service agencies. The city's Citizen's Advisory Committee for Housing and Community Development are also active participants in many of these organizations.

Ability Connection Colorado - Creative Options for Early Childhood Education Adams County Community Development •Arapahoe County Community Resources •Arapahoe County Human Services •Aurora Cultural Arts District (ACAD) •Arapahoe/Douglas Works! •Asian Pacific Development Center •Archway Housing & Services Inc. •Aurora Chamber of Commerce •Aurora Housing Authority (AHA) •Aurora Interfaith Community Services (AICS) •Aurora Mental Health Center (AUMHC) •Aurora Public Schools (APS) •Aurora Warms the Night (AWtN) •Aurora@Home •Brother's Redevelopment Inc. (BRI) •Colfax Community Network (CCN) •Comitis Crisis Center/Mile High Behavioral Healthcare (Comitis) •Community Housing Partners (CHP - legal name Aurora Housing Corporation) •Community Re-Entry Place Inside/Out •Downtown Aurora Visual Arts (DAVA) •Family Promise of Greater Denver •Gateway Domestic Violence Services (GDVS) •InnovAge Greater Colorado PACE program •Metro Community Provider Network (MCPN) •Metro Denver Homeless Initiative (MDHI) •National Equity Fund •Restoration Outreach Programs •The ARC of Aurora •University of Colorado Denver-Anschutz Medical Campus

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The primary collaborative through which the City coordinates the activities of housing and health care providers is the Aurora @ Home Collaborative, the ten year plan to address homelessness. The Aurora Housing Authority also assists the City in meeting its housing goals through its programs and development of affordable rental housing. The City is also working with private homebuilders to explore incentives for creating a larger inventory of middle income ownership products.

Participants in the focus groups conducted for stakeholder consultation acknowledged the need for additional resources within the City to support housing and community development goals. At the time this plan was developed, the City was considerably short-staffed, in need of community development staff, a dedicated housing planner, as well as staff to support the Aurora @ Home Collaborative.

Stakeholders also expressed a need for greater institutional support from the health care industry and area foundations. To that end, the City has begun discussions with the Mental Health Center of Aurora and, as part of the new Housing Strategy, intends to prioritize capacity building with public and private partners and explore expanding resources to support housing goals, such as a dedicated housing fund.

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

The City of Aurora, and its collaborative partners in Aurora@Home (A@H), are active partners with Metro Denver Homeless Initiative (MDHI), the region's HUD designated Continuum of Care (CoC). Since the last Five-year Consolidated Plan was produced, the City hired a designated staff member to implement strategies to address homelessness. This staff member served as the Chair of the Executive Committee of MDHI during development of this Consolidated Plan.

MDHI also serves as the administrator of OneHome, the region's new coordinated entry system for people experiencing homelessness to access housing and supportive services. OneHome is also used to target mobile outreach and housing navigation through use of the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) to assess. OneHome has experienced data migration challenges, which the Executive Committee (and City of Aurora staff) are working to improve to make the single point of entry system more effective.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

With City staff as a past member of the MDHI Executive Committee, the City of Aurora coordinates closely with MDHI to ensure that funds are allocated to best meet needs. MDHI has been in a period of transition since the past Consolidated Plan and now has a new Executive Director, and is in the process of developing a strategic and operational plan.

During the development of the CoC that occurred concurrent with this Consolidated Plan, fund allocation priorities, performance standards, and outcomes were shaped by the following:

- MDHI recently added a board member to represent the voice of at-risk youth in the CoC strategic and operational planning.
- Aurora's Executive Committee member led a stakeholder meeting to provide feedback into MDHI's new strategic plan. The goal of that plan is to combine intentions with operational realities, ensuring that MDHI's areas of focus align with community priorities.
- A newly formed Equity Group provides support to MDHI leadership and ensures that funding, policies, and performance standards are viewed through an equity lens.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

On August 2, 2019, the City of Aurora hosted a focus group with service providers to inform the Consolidated Plan.

Service providers invited to attend included:

- Ability Connection Colorado—
Creative Options for Early Childhood
Education
- Arapahoe County Community
Resources
- Arapahoe/Douglas Works!
- Archway Housing & Services Inc.
- Asian Pacific Development Center
- Aurora Chamber of Commerce
- Aurora Cultural Arts District (ACAD)
- Aurora Day Resource Center
- Aurora Housing Authority (AHA)
- Aurora Interfaith Community
Services (AICS)
- Aurora Mental Health Center
(AUMHC)
- Aurora Public Schools (APS)
- Aurora Salvation Army
- Aurora Warms the Night (AWtN)
- Brother's Redevelopment Inc. (BRI)
- Catholic Charities
- Children's Hospital
- Colfax Community Network (CCN)
- Comitis Crisis Center/Mile High
Behavioral Healthcare (Comitis)
- Community Housing Partners (CHP -
legal name Aurora Housing
Corporation)
- Downtown Aurora Visual Arts (DAVA)
- East Metro Detox and Rehab Center
- Family Promise of Greater Denver
- Gateway Domestic Violence Services
(GDVS)
- InnovAge Greater Colorado PACE
program
- Metro Community Provider Network
(MCPN)
- Project Angel Heart
- Restoration Outreach Programs
- Second Chance Center
- Spanish Clinic
- Veteran's Hospital
- The ARC of Aurora
- University of Colorado Denver-
Anschutz Medical Campus
- Village Exchange Center

Eleven stakeholders attended the meeting.

City staff also met with the Aurora Housing Authority board and staff during development of this plan.

In addition, stakeholders attended meetings with the Citizen’s Advisory Committee on Housing and Community Development (CHD) were able to observe presentations about the Consolidated Plan progress and offer comments about priority needs.

The City worked closely with the City and County of Denver in development of the Analysis of Impediments to Fair Housing Choice (AI). Staff participated in planning meetings and assisted in developing the workscope and community engagement plan.

Table 2 – Agencies, groups, organizations who participated

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

No agencies were intentionally excluded from consultation.

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

Other planning efforts that were considered in preparation of the Five-year plan are summarized in the following table.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Mobile Home Task Force Report	Aurora Mobile Home Task Force	Strategic plan goals to create and preserve affordable housing opportunities include efforts to create additional housing options for those at risk of displacement from mobile home parks
Aurora@Home	Aurora@Home	Strategic plan goals include preventing homelessness and providing rapid rehousing for residents experiencing homelessness
Regional Analysis of Impediments to Fair Housing Choice	Aurora Community Development	All actions for Aurora are built into the Five-year Plan
Immigrant Integration Plan (ongoing)	City Manager's Office	NRSA revitalization goals are focused on the neighborhoods with the highest proportions of immigrants. Revitalization activities are intended to improve safety and support small business expansion. Tenant and homebuyer counseling, which is housed in the Martin Luther King Library in Original Aurora, provide a neighborhood resource to promote good tenant practices and facilitate homeownership
Aurora Housing Strategy (ongoing)	City Manager's Office	Strategic Plan goals are part of the overall strategy

Regional Continuum of Care	Metro Denver Homeless Initiative	Strategic plan goals include preventing homelessness and providing rapid rehousing for residents experiencing homelessness
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Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Community Development (CD) staff actively coordinate with the Colorado Division of Housing (CDOH). CDOH has provided match funding for several major publicly assisted housing developments and the City anticipates this will continue with an increase in statewide funding for affordable housing.

CD staff also regularly participate in local and regional conferences that promote regional collaboration. The City’s Mayor and Council are active in regional and state initiatives including:

- Colorado Municipal League;
- Denver Regional Council of Governments;
- I-70 Regional Economic Advancement Partnership (REAP);
- Juvenile Justice and Delinquency Prevention Council for the State of Colorado;
- Regional Air Quality Council; and
- National League of Cities.

PR-15 Citizen Participation

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

Citizen outreach and the resulting participation was extensive, involving more than 900 Aurora residents. The resident survey, which was completed ahead of the Consolidated Plan and informed both the AI and the Consolidated Plan, was very inclusive of typically under-represented populations.

Altogether, citizen participation reached the following unique resident groups:

Low- and moderate-income households—represented by 240 survey responses and 111 attendees at two community meetings (one with Aurora Housing Authority residents and one with recent immigrants at the Village Exchange Center);

Residents of low- and moderate-income neighborhoods, and in areas where CDBG funds are proposed to be used—three community meetings were held in Original Aurora, the city's designated Neighborhood Revitalization Strategy Area (NRSA);

Minorities—represented by 231 survey responses and 150 attendees at community meetings, Ten Spanish speaking, very low income residents participated in one-on-one exchanges at the Aurora Economic Opportunity Center;

Non-English speaking persons—Approximately 150 residents attended a community meeting at the Village Exchange Center, where translations were available in seven different languages. Ten Spanish speaking, very low income residents participated in one-on-one exchanges at the Aurora Economic Opportunity Center;

Persons with disabilities—164 residents with disabilities were represented in the resident survey;

Public housing residents and other low-income residents of targeted revitalization areas in which public housing developments are located—74 survey responses were received by residents living in publicly supported housing (including voucher holders) and 35 Aurora Housing Authority residents attended a community meeting located in a targeted revitalization area;

Aurora residents overall—An estimated 500 residents visited a booth and participated in exercises to prioritize housing and community development activities at the City's annual GlobalFest event, held in August 2019; and

Local and regional institutions, including the Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations—Five focus groups with stakeholders were held throughout development of the Consolidated Plan.

The draft Consolidated Plan was available for public comment between October 1 and 31, 2019. The plan was available online and in paper copy for review at the Martin Luther King Library, located in the City’s designated NRSA. A public hearing was held on October 8, 2019, also at the Martin Luther King Library.

Residents were notified of the draft Plan and public hearing through the City’s communications office, through online postings and e-blasts to organizations that work with low income and special needs residents. These organizations were also offered technical assistance to apply for funds, as needed, as part of stakeholder outreach for the 2019 Action Plan which occurred in summer 2019, in tandem with development of the Five-year Consolidated Plan.

These efforts are also summarized in the table below.

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
Citizen Survey for Regional AI	Residents most vulnerable to housing barriers and with disproportionate housing needs	790 Aurora resident respondents (5,889 respondents regionwide)	Feedback related to housing needs and challenges, community access to opportunity, accessibility, and discrimination, summarized in citizen engagement section in the full AI document (attached to Consolidated Plan).	All input was considered in crafting the Five-year strategies and action plan	http://denver-aurora-boulder.afh.com/

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
Resident focus groups for Regional AI	Residents most vulnerable to housing barriers and with disproportionate housing needs	350 residents region-wide participated in-depth discussions about their housing challenges. These groups primarily represented immigrants, Spanish speakers, African Americans, families with children, persons with disabilities, LGTBQ residents, and at-risk youth.	Feedback related to housing needs and challenges, community access to opportunity, accessibility, and discrimination, summarized in citizen engagement section in the full AI document (attached to Consolidated Plan).	All input was considered in crafting the Five-year strategies and action plan	http://denver-aurora-boulder.afh.com/

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
Pop-up engagement for regional AI	Residents most vulnerable to housing barriers and with disproportionate housing needs	To round out resident engagement for the AI and ensure that protected classes were represented, the study team visited day labor sites, ethnic food markets, central libraries, and affordable housing developments to have conversations with residents about their housing challenges and distribute surveys.	Feedback related to housing needs and challenges, community access to opportunity, accessibility, and discrimination, summarized in citizen engagement section in the full AI document (attached to Consolidated Plan).	All input was considered in crafting the Five-year strategies and action plan	http://denver-aurora-boulder.afh.com/

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 Meetings for Regional AI	Residents most vulnerable to housing barriers and with disproportionate housing needs	<p>The Regional AI culminated in a large, interactive, community celebration and discussions of housing needs, attended by more than 150 residents representing many cultures, traditions, languages, family types, and races and ethnicities. Translations were offered in Spanish, Somali, Pashtun, Burmese, French, and Karen. The Aurora meeting was held at the Village Exchange Center</p>	Feedback related to housing needs and challenges, community access to opportunity, accessibility, and discrimination, summarized in citizen engagement section in the full AI document (attached to Consolidated Plan).	All input was considered in crafting the Five-year strategies and action plan	http://denver-aurora-boulderafh.com/

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
Website	Residents most vulnerable to housing barriers and with disproportionate housing needs	The website was available in five languages in addition to English. More than 2,000 residents accessed the website and used the translation features.	N/A	All input was considered in crafting the Five-year strategies and action plan	http://denver-aurora-boulder.afh.com/
Engagement at GlobalFest Festival	Attendees committed to celebrating “celebration of diversity, inclusion and a great summer multicultural experience”	More than 500 residents visited a booth and participated in activities that captured top housing and community development needs and concerns	Many compliments about Aurora; residents consistently mentioned inclusiveness and welcoming atmosphere. The majority of concerns were related to challenges with transportation and expanded access to parks	All input was considered in crafting the Five-year strategies and action plan, particularly prioritization of needs	

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
Focus group with public housing authority residents	Public housing residents	21 residents attended the focus group and included 7 African American/Black, 8 White, 5 Asian, 1 Other (Arab)	Primary concerns were resident safety (in neighborhood), access to transit and city recreation centers	All input was considered in crafting the Five-year strategies and action plan	

Table 4 – Citizen Participation Outreach

Overall Themes from Resident Engagement

As part of the citizen participation efforts to inform the Consolidated Plan, Aurora residents were asked to prioritize what matter most to them when they think about home and neighborhood through an engagement activity.

Safe neighborhoods with access to quality parks or green space, sidewalks and good schools near affordable housing are the qualities of a neighborhood prioritized by the greatest number of participants, sentiments shared by children and families throughout Aurora.

For many participants, the qualities of home and neighborhood that matter most are not a part of their current housing situation; the most frequently mentioned concern related to safety/crime, followed by better quality school systems and lack of affordable housing. Rising rents displacing long-term residents are a significant concern.

Overwhelmingly, residents love living in Aurora due to the City’s community-oriented nature and cultural diversity.

“I recently moved to Aurora from Castle Rock and I LOVE my multi-cultural neighborhood.”

“I love the community. We always have each other’s back.”

“The quality libraries, festivals and cultural centers really help bring people together.”

Needs Assessment

NA-05 Overview

Needs Assessment Overview

This section utilizes data from the 2017 CHAS, as well as other data sources where noted, to show where households of different types have greater housing needs than others.

The data show that disproportionate needs exist for:

- Extremely low-income renters, making 30 percent or below AMI. These renters are disproportionately impacted by severe cost burden and substandard housing.
- Low income African Americans, and extremely low income Hispanic households, who are slightly disproportionately more likely to face housing problems than other residents. That said, differences in needs among residents of different races and ethnicities in Aurora is very modest relative to other communities, signaling that Aurora has done a good job providing housing to a wide range of households.
- Small family households, which would include seniors living with spouses and other family members, couples, and single parents, are most likely to be very low income.

According to stakeholders, residents who face the greatest housing needs include:

- Residents with criminal history backgrounds and survivors of domestic violence. Lack of resources for transitional housing create a gap in institutional structure and housing and services delivery.
- These types of residents are also perceived by landlords as “high risk.” In today’s tight rental market, many landlords are unwilling to accept higher risk tenants.

Future Needs

A model of current and future housing needs developed for this study projects that, during the 5 years of this Consolidated Plan, housing needs in Aurora will grow to:

- Extremely low-income families: 15,205 with housing needs now v. 16,093 in 2024;
- Very low-income families: 14,565 with housing needs now v. 15,415 in 2024;
- Low income families: 13,325 with housing needs now v. 14,103 in 2024;
- Low to moderate income families: 3,825 with housing needs now v. 4,048 in 2024;
- Renters: 30,450 with housing needs now v. 32,228 in 2024;
- Owners: 19,180 with housing needs now v. 32,228 in 2024;

- Elderly households: 10,769 with housing needs now v. 11,398 in 2024;
- Single person households: 3,175 with housing needs now v. 3,360 in 2024;
- Large family households: 8,340 with housing needs now v. 8,827 in 2024;
- Limited English Proficiency (LEP) households: 1,216 with housing needs now v. 1,287 in 2024;
- Households with a member with a disability: 12,830 with housing needs now v. 13,579 in 2024. Of households with a disability with current needs—5,300 have hearing or vision impairments, 6,810 have ambulatory limitations, 5,450 have cognitive limitations, 5,650 have self-care or independent living limitations.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Historically, Aurora has been one of the fastest growing cities in the Denver metro region—and this has remains the case. Population growth since the last Five-year Plan was produced has been consistent with the Denver metro region overall and is on par with nearby quickly-developing cities like Commerce City. One unique aspect of the City’s growth is the difference between population and household growth: As shown in the HUD table below, population grew faster than households, meaning that residents are living in larger-sized households. This could be due to a growth in families, including extended families living together, as well as more roommate and overcrowded living situations—strategies to manage affordability challenges.

Aurora has historically provided housing affordable to a range of incomes and, as such, the median household income in the City is modest. Aurora’s median household income of \$59,467 is lower than the State of Colorado (\$65,685) and the Denver metro overall (\$71,926). However, over the last 16 years, the income distribution of Aurora households has shifted toward higher income ranges, indicating higher income households moved to the City or existing households are earning more.

Cost burden and severe cost burden, for both renter and owner households, are the most common housing problems in Aurora. According to the 2011-2015 CHAS data, 12,430 low to moderate income rental households experience cost burden (28%) and 12,155 low to moderate income rental households experience severe cost burden (27%). Among owner households, a lower number but similar proportion (9,630 or 29%) are cost burdened and 6,060 or 18 percent are severely cost burdened.

The HUD-provided tables show cost burden and other housing problems by income level (AMI). For the purposes of this plan, these definitions will be used consistency throughout the NA and MA sections.

- 0-30% AMI = extremely low-income
- 30-50% AMI = very low-income
- 50-80% AMI = low-income
- 80-100% AMI = low to moderate income

Demographics	Base Year: 2000	Most Recent Year: 2017	% Change
Population	276,393	367,250	32.9%
Households	105,625	128,100	21.3%

Demographics	Base Year: 2000	Most Recent Year: 2017	% Change
Median Income	\$46,507	\$63,055	35.6%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2017 ACS 1-Year, 2000 U.S. Census

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	17,840	17,930	26,880	15,420	45,965
Small Family Households *	6,220	7,295	11,290	6,650	24,780
Large Family Households *	1,975	2,480	3,140	1,765	3,850
Household contains at least one person 62-74 years of age	2,705	2,895	4,175	2,445	9,674
Household contains at least one person age 75 or older	1,825	1,850	1,865	1,115	2,405
Households with one or more children 6 years old or younger *	4,640	4,850	6,140	3,015	6,710

Table 6 - Total Households Table

Data Source: CHAS 2011-2015

Housing Problems (Households with one of the listed needs)	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										

Housing Problems (Households with one of the listed needs)	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing – Lacking complete plumbing or kitchen facilities	180	65	120	10	375	15	40	60	10	125
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	770	230	245	95	1,340	20	30	85	70	205
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,340	1,055	840	410	3,645	185	215	425	130	955
Housing cost burden greater than 50% of income (and none of the above problems)	8,135	3,405	515	100	12,155	2,815	1,710	1,265	270	6,060

Housing Problems (Households with one of the listed needs)	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	1,005	5,655	5,075	695	12,430	735	2,165	4,695	2,035	9,630
Zero/negative Income (and none of the above problems)	1,185	0	0	0	1,185	295	0	0	0	295

Table 7 – Housing Problems Table

Data Source: CHAS 2011-2015

Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	10,430	4,750	1,720	615	17,515	3,035	1,995	1,835	480	7,345
Having none of four housing problems	1,685	6,910	12,055	5,165	25,815	1,215	4,265	11,270	9,165	25,915
Household has negative income, but none of the other housing problems	1,185	0	0	0	1,185	295	0	0	0	295

Table 8 – Housing Problems 2

Data 2011-2015 CHAS
Source:

Cost Burden > 30% and < 50%	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	620	2,850	2,570	6,040	85	825	1,815	2,725
Large Related	320	980	510	1,810	150	385	665	1,200
Elderly	245	685	390	1,320	435	685	975	2,095
Other	445	1,820	1,830	4,095	150	395	1,335	1,880
Total need by income	1,630	6,335	5,300	13,265	820	2,290	4,790	7,900

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS
Source:

Cost Burden > 50%	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	4,090	1,600	170	5,860	800	770	450	2,020
Large Related	1,055	340	20	1,415	255	205	130	590
Elderly	1,480	495	210	2,185	1,120	520	450	2,090
Other	3,035	1,070	120	4,225	725	270	230	1,225
Total need by income	9,660	3,505	520	13,685	2,900	1,765	1,260	5,925

Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS
Source:

Crowding (More than one person per room)	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	1,770	1,175	765	375	4,085	185	165	300	170	820
Multiple, unrelated family households	300	95	225	125	745	20	94	175	35	324
Other, non-family households	50	25	95	0	170	0	0	30	0	30
Total need by income	2,120	1,295	1,085	500	5,000	205	259	505	205	1,174

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

The number of single person households in Aurora is 32,537. Of these single person households, 3,175, or 10 percent need housing assistance. This is based on the number of single person households living below the poverty level. In the next five years, the single person households in need of housing assistance is projected to grow by 185 households.

Many single person households are elderly and frail elderly residents who are disproportionately likely to have a disability and have housing problems: CHAS data suggest that one-third of elderly households have housing needs, or 10,769 households today and 11,398 in five years.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Households with disabilities. More than 26,900 households in Aurora have a disability (hearing or vision impairment, ambulatory limitation, cognitive limitation or self-care or independent

living limitation). Nearly 50 percent of households living with a disability have a housing need—equal to 12,830 households—based on the housing problems (CHAS) data provided by HUD. In the next five years, households with disabilities in need of housing assistance is projected to grow by 749 households, totaling 13,579 who will have needs.

Victims of domestic violence. According to the Centers for Disease Control (CDC), 37 percent of women and 34 percent of men aged 18 or older have experienced contact sexual violence, physical violence, or stalking by an intimate partner in their lifetime. Annual incidence rates—meaning the proportion of people who have experienced contact sexual violence, physical violence, or stalking by an intimate partner in the previous year—are 5.5 percent for women and 5.2 percent for men.

Applying these rates to the Aurora population of women and men over 18 indicates that 14,703 residents are likely to have experienced some type of domestic violence, dating violence, sexual assault and/or stalking by an intimate partner in the previous year. National statistics show that 3.6 percent of women and 1.0 percent of men experiencing intimate partner violence need housing services. In Aurora, these statistics suggest that 348 victims of domestic violence require housing services each year.

Although the supportive and housing services needed by intimate partner violence (IPV) victims vary, generally, all need health care and counseling immediately following the event and continued mental health support to assist with the traumatic stress disorder related to the event. Victims may also require assistance with substance abuse and mental health services, both of which are common among IPV victims.

Affordable housing is also critical: The National Alliance to End Homelessness argues that a “strong investment in housing is crucial [to victims of domestic violence] ...so that the family or woman is able to leave the shelter system as quickly as possible without returning to the abuse.” The Alliance also reports that studies on homelessness have shown a correlation between domestic violence and homelessness.¹

What are the most common housing problems?

Cost burden and severe cost burden, for both renter and owner households, are the most common housing problems in Aurora. According to the 2011-2015 CHAS data, 12,430 low to moderate income rental households experience cost burden (28%) and 12,155 low to moderate income rental households experience severe cost burden (27%). Among owner households, a lower number but similar proportion (9,630 or 29%) are cost burdened and 6,060 or 18 percent are severely cost burdened.

Are any populations/household types more affected than others by these problems?

Yes. Those households who are most affected by housing problems, especially cost burden, include:

¹ http://www.endhomelessness.org/pages/domestic_violence

- Low income renters earning 30-50 percent AMI (5,655 households) and 50-80 percent AMI (5,075)—experience 86 percent of the total cost burden (10,730 total households).
- Low income renters earning 0-30 percent AMI—67 percent experience severe cost burden.
- Low income owners earning 50-80 percent AMI—49 percent experience cost burden.
- Low income family households who own (with 2-4 related members) earning 80 percent AMI or less represent 35 percent of those owners experiencing cost burden.
- Low income elderly households who own earning 80 percent AMI or less represent 35 percent of those owners experiencing *severe* cost burden.
- Low income family household who rent (with 2-4 related members) earning 80 percent AMI or less represent 46 percent of those owners experiencing cost burden.
- Renter households are also more likely to be living in overcrowded conditions than homeownership households. Crowding is particularly prevalent in single family households. Of the 5,000 low-to-moderate income renters facing crowding problems, 82 percent are single family households.
- Housing problems disproportionately experienced by residents of diverse races and ethnicities are discussed below. According to HUD CHAS data, residents who experience the highest rates of housing problems include: Pacific Islanders and African Americans.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Households spending 50 percent or more of their income on housing are considered at risk of homelessness. These households have limited capacity to adjust to rising home prices and are vulnerable to even minor shifts in rents, property taxes, and/or incomes. CHAS data in the below table indicates that 18,215 Aurora households (12,155 renters and 6,060 owners) are severely cost burdened, spending more 50 percent or more of their income on housing.

In addition, according to stakeholders interviewed for this study, persons with criminal histories, survivors of domestic violence, people experiencing substance abuse, and persons with mental illness are particularly vulnerable to homelessness due to their past rental histories and landlords' unwillingness to rent to tenants who are perceived as high risk.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Some of the most common social and housing characteristics that lead to housing instability and homelessness include severe cost burden (paying more than 50 percent of gross household income in housing costs); domestic violence; job losses/inability to find stable employment; chemical dependency; mental illness; and medical or disability related conditions that negatively affect earned income.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole or white households.

Introduction

A disproportionately greater need exists when the members of a racial or ethnic group at any income level experience housing problems at a greater rate (defined as 10 percentage points or more) than the income level as a whole or white households within the same income bracket. For example, assume that 60 percent of all low-income households within a jurisdiction have a housing problem and 70 percent of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need.

Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified. Although the purpose of these tables is to analyze the relative level of need for each race and ethnic category, the data also provide information for the jurisdiction as a whole that can be useful in describing overall need.

Disproportionate housing needs in a population are defined as having one or more of the following four housing problems in greater proportion than the jurisdiction as a whole or than whites:

- 1) Living in housing that lacks complete kitchen facilities;
- 2) Living in housing that lacks complete plumbing facilities;
- 3) More than one person per room (overcrowded); and
- 4) Cost burden greater than 30 percent of Area Median Income (AMI).

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	15,205	1,165	1,480
White	5,535	665	735
Black / African American	3,635	140	250
Asian	780	95	160
American Indian, Alaska Native	130	24	4

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	55	0	15
Hispanic	4,505	160	240

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	14,565	3,360	0
White	5,830	1,845	0
Black / African American	2,825	395	0
Asian	580	160	0
American Indian, Alaska Native	85	34	0
Pacific Islander	40	0	0
Hispanic	4,760	825	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	13,325	13,555	0
White	6,325	7,080	0
Black / African American	2,439	2,170	0
Asian	724	535	0
American Indian, Alaska Native	60	10	0
Pacific Islander	19	10	0
Hispanic	3,250	3,495	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,825	11,595	0
White	2,170	7,515	0
Black / African American	740	1,410	0
Asian	100	370	0
American Indian, Alaska Native	10	0	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	0	100	0
Hispanic	740	1,940	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

This section discusses the income categories in which a racial or ethnic groups has disproportionately greater need.

All groups have relatively high rates of housing problems with a disproportionately high rate of need, within most earning levels, relative to the jurisdiction as a whole.

0-30% AMI.

Ninety-three percent of all households earning 30 percent AMI or less have at least one of the four housing problems. Across all race and ethnicities, housing problems are very high with no single race or ethnicity disproportionately impacted by housing needs, except for Pacific Islander households who are more likely to experience housing problems than white households by 11 percentage points.

Pacific Islander households make up a small proportion of households, therefore, it is harder to accurately assess their disproportionate housing needs. However, 100 percent of the 55 Pacific Islander households have a housing problem.

30-50% AMI.

Similar to the 0-30 percent AMI income level, all households in this income groups have high rates of housing needs. In the jurisdiction overall, 81 percent of households have at least one housing problem.

For households earning 30-50 percent of AMI, African American households experience a disproportionate need at 12 percentage points higher than white households. Pacific Islander households at this income level have a disproportionate need of 24 percentage points higher than white households.

50-80% AMI.

For households earning 50-80 percent of AMI, Asian households (11% points), Pacific Islander households (18% points) and American Indian, Alaska Native households (38% points) experience a disproportionate need than white households.

80-100% AMI.

One in four households earning 80-100 percent of AMI in the jurisdiction as a whole continue to have one or more housing problems. Disproportionately high housing needs are experienced by African Americans households at 16 percentage points higher than white households.

100 percent of the ten American Indian households experience a housing problem.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section discusses severe housing needs as defined by HUD, using HUD-prepared housing needs data. The tables show the number of Aurora households that have severe housing needs by income and race and ethnicity.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	13,465	2,900	1,480
White	4,675	1,520	735
Black / African American	3,185	590	250
Asian	730	145	160
American Indian, Alaska Native	130	24	4
Pacific Islander	55	0	15
Hispanic	4,205	460	240

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:
 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,745	11,175	0
White	2,800	4,880	0
Black / African American	1,320	1,895	0
Asian	310	435	0
American Indian, Alaska Native	60	65	0
Pacific Islander	0	40	0
Hispanic	2,115	3,470	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,555	23,325	0
White	1,420	11,975	0
Black / African American	565	4,045	0
Asian	275	980	0
American Indian, Alaska Native	35	35	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	0	30	0
Hispanic	1,095	5,655	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,095	14,330	0
White	600	9,085	0
Black / African American	185	1,955	0
Asian	4	465	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	100	0
Hispanic	290	2,390	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

This section discusses the income categories in which a racial or ethnic groups has disproportionately greater need.

All groups have relatively high rates of severe housing problems with a disproportionately high rate of severe need, within most earning levels, relative to the jurisdiction as a whole.

0-30% AMI.

Eighty-two percent of all households earning 30 percent AMI or less have a severe housing problem. Across all race and ethnicities, housing problems are very high with no single race or ethnicity disproportionately impacted by how housing needs, except for Pacific Islander households who are more likely to experience housing problems by 25 percentage points and Hispanics by 15 percentage points than white households.

Overall, there are nearly 13,500 households in Aurora with one or more severe housing problems and who may be at risk of homelessness.

30-50% AMI.

In the jurisdiction overall, 38 percent of households have at a severe housing problem.

For households earning 30-50 percent of AMI, American Indian households experience a disproportionate need at 12 percentage points higher than white households.

50-80% AMI.

For households earning 50-80 percent of AMI, Asian households (11% points) and American Indian, Alaska Native households (39% points) experience a disproportionate need than white households.

80-100% AMI.

In the jurisdiction overall, only seven percent of households (1,095 households) have a severe housing problem. In this income bracket, there are no single race or ethnicities that are experiencing disproportionate severe housing needs than the white households or the jurisdiction overall.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

This section provides data on households with disproportionate levels of housing cost burden. Cost burden is experienced when a household pays more than 30 percent of their gross household income toward housing costs, including utilities. Severe cost burden occurs when housing costs are 50 percent or more of gross household income.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	76,565	25,785	20,170	1,519
White	49,050	11,920	8,805	740
Black / African American	9,125	4,990	4,425	250
Asian	3,275	1,095	1,055	160
American Indian, Alaska Native	240	80	205	4
Pacific Islander	255	60	55	15
Hispanic	12,860	6,765	4,965	250

Table 21 – Greater Need: Housing Cost Burdens AMI

Data 2011-2015 CHAS
Source:

Discussion:

The table above shows the level of housing cost burden by race/ethnicity of households. For the jurisdiction overall, 76,565 households pay less than 30 percent of their income in housing costs. 25,785 pay between 30-50 percent of their income in housing costs, and 20,170 pay more than 50 percent and are *severely* cost burdened.

Overall in Aurora, 21 percent of all households are cost burdened and 16 percent of all households are severely cost burdened.

Nearly 40 percent of all American Indian/Alaska Native households experience *severe* cost burden and are 26 percentage points disproportionately *severely* cost burdened than the City as a whole.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole? If they have needs not identified above, what are those needs? Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Yes, as discussed above low income African American households, extremely low income Hispanic households, and households with Native American and Pacific Islander residents (although very small in number) have the greatest and disproportionate housing needs. As discussed in MA-50, these households are more likely to live in Northwest Aurora in and near the City's Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs).

In addition, the Regional AI found that certain resident groups are more likely to face displacement, as shown below. Displacement caused by investors selling rental units was significantly higher in Aurora than in the region and in any other jurisdiction. Similarly, 46 percent of Housing Choice Voucher holders in Aurora said they are worried their landlord will stop accepting vouchers. Although this is slightly lower than the region overall (49 percent), this concern likely reflects the diminishing stock of affordable rentals, particularly those that fall within HUD's fair market rent range, in Aurora.

Displacement Experience and Reasons for Displacement by Jurisdiction Overall, Current Renters and Those Precariously Housed or Homeless

Place of Current Residence	Percent Displaced	Reason for Displacement		
		Rent Increased More Than I Could Pay	Evicted: Behind on the Rent	Landlord Selling Home
Aurora	20%	40%	5%	30%
Renters	42%	40%	5%	35%
Precariously housed/homeless	26%	30%	30%	13%
Denver	19%	43%	6%	18%
Renters	30%	44%	4%	20%
Precariously housed/homeless	49%	43%	17%	6%
Boulder	18%	31%	6%	17%
Renters	24%	33%	3%	12%
Precariously housed/homeless	49%	26%	17%	13%
Boulder County	20%	45%	7%	12%
Renters	21%	51%	7%	9%
Precariously housed/homeless	34%	35%	18%	17%
Broomfield	21%	50%	0%	12%
Renters	46%	42%	0%	16%
Precariously housed/homeless	-	-	-	-
Longmont	16%	30%	10%	13%
Renters	28%	27%	12%	12%
Precariously housed/homeless	46%	44%	17%	0%
Region	19%	41%	6%	19%
Renters	30%	41%	5%	20%
Precariously housed/homeless	43%	42%	17%	8%

Note: Displacement did not necessarily occur within current community of residence. - Sample size too small to report.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

NA-35 Public Housing – 91.205(b)

This section discusses the beneficiaries and needs of clients of the Aurora Housing Authority. It is based on data provided by AHA for the Regional AI.

Demographics of Aurora Housing Authority Beneficiaries, 2018

AHA Beneficiaries	Race						Ethnicity	
	% White	% Black	% Asian	% American Indian	% Pacific Islander	% MultiRacial	% Hispanic	% Non-Hispanic
Residents living in AHA properties	28%	45%	17%	1%	1%	8%	16%	84%
Voucher holders	N/A	N/A	N/A	N/A	N/A	N/A	9%	91%
Denver Region overall	81%	6%	4%	1%	0%	3%	22%	70%

AHA Beneficiaries	Percent of Area Median Income (AMI)				Other Household Characteristics	
	30% AMI	40% AMI	50% AMI	60% AMI	% Disability	% Single Parent Household
Residents living in AHA properties	3%	3%	17%	78%	11%	40%
Voucher holders	80%	16%	4%	0%	35%	44%
Denver Region overall	11%	N/A	9%	N/A	9%	N/A

Note: Adjusted for beneficiaries for whom race or ethnicity is unknown. Proportions may not total 100% due to rounding.

Source: Aurora Housing Authority, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (<https://egis.hud.gov/affht/>), 2016 1-year American Community Survey, and BBC Research & Consulting.

Residents living in AHA properties are predominately low- to moderate-income, making 50 to 60 percent of the Area Median Income (AMI). In contrast, voucher holders in Aurora have lower incomes: 80 percent of residents with vouchers make 30 percent or less of the AMI. Compared to the Region overall, residents living in AHA properties are disproportionately African American/Black (45%) and Asian (17%). Thirty five percent of voucher holders live with a disability, compared to 11 percent in AHA properties and 9 percent in the Region overall. In typical markets, persons with disabilities have trouble finding accessible units outside of those provided by public housing entities. The ability of voucher holders to access the housing they need in Aurora is unusual and should be an area of continued focus in housing programming.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Based on a focus group conducted with AHA participants, the most critical and immediate needs include:

- AHA residents worry about gang violence, threats from non-residents in the neighborhood, and security breaches on their property (e.g., security gate is sometimes propped open or not properly closed). Residents feel that the police are very slow to respond if call is from their property and there is a need for meetings to grow a relationship and establish trust.
- Residents felt that their neighborhoods were neglected: too dark on streets, not enough street lights, streets not maintained well (particularly in winter).
- Recreational centers are hard to get to and not accessible by bus.
- Accessibility is an issue for elderly and disabled; it can be difficult to shop. Access-a-ride is not dependable and people have missed doctors' appointments because it did not show up. It is not convenient and can make it hard to work.
- Residents live in a food desert and want healthier grocery stores (TJ's or Sprouts) but only have convenience stores and Walmart (which doesn't have good fresh food and has some accessibility issues). Many are forced to drive far just to get groceries, which puts additional financial stress and takes time.
- Overall, residents love their community but are concerned about the broader neighborhood, particularly safety, gang violence, and residential and commercial blight.

How do these needs compare to the housing needs of the population at large

These concerns and needs are similar to those of residents living in higher crime and under-invested areas in Aurora and nearby Denver.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The Point in Time (PIT) count, conducted nationally, is a snapshot of those experiencing homelessness on a single night. This data was collected for the night of January 28th, 2019. The City of Aurora PIT count was part of the region wide Everyone Counts Metro Denver Homeless Initiative. The City of Aurora is largely located in Adams and Arapahoe counties, with the extreme southeastern portion extending into Douglas County.

A PIT committee was formed to support planning and implementation of the count. There was coordination to cover overlapping areas, particularly in Adams County, which shared unsheltered outreach “hot spots.” The Aurora Community Outreach Team (ACOT) and agency staff-led outreach mobile vans covered the City according to ward designations. The severe weather shelter and motel vouchering system activated for the night of the PIT, even though the temperature would not have called for activation. This facilitated the surveying of those who may not have been found during outreach that night. Aurora also held a magnet event at the Aurora Day Resource Center, holding a “sleep over party” for adults without children. Also, the Aurora GIS department was an integral partner in preparing the mobile survey tool as well as the mapping services prior to and during the count. Nearly all surveys were completed on the mobile survey tool throughout the City.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

According to the January 2019 PIT count, a total of 389 residents in Aurora were experiencing homelessness. This was up slightly from 2018 (357). Of these residents, 54 were newly homeless and 77 are chronically homeless. The majority, 285 (73%), were living in emergency shelters, 74 (19%) in transitional housing and 30 (8%) were unsheltered. Compared to 2018 data, a much higher proportion of residents were living in transitional housing and a much smaller proportion were unsheltered.

HUD defines persons experiencing chronic homelessness as those who (a) are homeless, (b) are living in a place not meant for human habitation, in a safe haven, or in an emergency shelter, (c) have been homeless and living in a place not meant for human habitation, a safe haven, or an emergency shelter continuously for at least 1 year or on at least four separate occasions in the last 3 years where the combined length of time homeless across those occasions is at least 12 months, and (d) have a disability.

Newly homeless is defined as a person who has been experiencing homelessness for less than one year and this was their first episode of homelessness.

Characteristics of the homeless population captured in the count include:

- 31 (8%) of the households in homelessness were families. Altogether, these families contained 86 people. Of these, 62 were in emergency shelters and 24 were living in transitional housing at the time of the count. None were unsheltered.
- 42 (11%) of the homeless population are veterans (25 living in emergency shelters, 15 in transitional housing, and 2 unsheltered).
- Forty-percent identified as female; 58 percent as male; one percent as gender nonconforming.
- Four individuals were living with HIV/AIDs.
- Three companion animals were identified in the count.
- 132 (34%) of the homeless population self-reported substance abuse. Of these, 84 were living in emergency shelter, 37 in transitional housing, 11 were unsheltered.
- About one-third disclosed a mental illness, with most of these individuals living in emergency shelters (82) and the balance in transitional housing (31) and unsheltered (10).
- 38 (10%) of the homeless population shared that they were currently fleeing domestic violence (30 living in emergency shelter, 6 in transitional housing, and 2 unsheltered).
- At the time of the 2019 PIT count, there were 17 unaccompanied youth (with 15 in a shelter and 2 in transitional housing) and 2 parenting youth and their children (all living in a shelter).

Unaccompanied or Transition Age Youth are defined as single youth who are under the age of 25 and not accompanied by a parent or guardian. Transition age youth are specifically those between 18-24 years old. Parenting youth are defined as those in the household that are under 25 years of age, and the guardians of a child under the age of 18.

Nature and Extent of Homelessness (optional):

Race:	Sheltered:	Unsheltered:
145 (37%) White 133 (34%) African American 5 (1%) Asian 29 (7%) American Indian/Native American 3 (1%) Pacific Islander 56 (14%) Multiple Races (18 or 5% did not disclose)	N/A	N/A
Ethnicity:	Sheltered:	Unsheltered:
308 (79%) Non-Hispanic 72 (19%) Hispanic (9 or 2% did not disclose)	N/A	N/A

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Based on the PIT count discussed above, at least 50 deeply subsidized units for families and another 50 deeply subsidized units for veterans are needed. These units should have onsite supportive services.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

According to the PIT count, just 30 adults and children were unsheltered (on the street, under a bridge, in a car, etc.) at the time of the January 2019 count. This is down significantly from 2018, when 115 people were found to be unsheltered. Of these, all were households without children.

The difference in unsheltered residents in 2018 to 2019 is attributed to more residents living in transitional housing.

Of households in shelters, the vast majority, 68, were households without children; just 3 had at least one adult and one child.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction

This section provides an overview of the housing and supportive service needs of non-homeless special populations in Aurora.

Describe the characteristics of special needs populations in your community

Many people with special needs have limited income and likely to be receiving social security disability payments. Those with mobility or physical disabilities have a need for accessibility modifications to housing and access to reliable, affordable public transportation. Persons with a substance dependence such as alcohol or other drug addictions, are more likely to need affordable housing and supportive services.

Similar to most other cities in the United States, there is a large, growing population of elderly in Aurora, nearly 52,000 elderly persons. 3,170 are considered frail elderly (defined as elderly persons who requires assistance with three or more activities of daily living, such as bathing, walking and performing light housework). Frail elderly are more likely to need daily self-care support. An estimated 3,415 elderly households in Aurora are cost burdened. 4,275 elderly households in Aurora are *severely* cost burdened.

Additional special needs populations in Aurora include:

- 24,920 residents 18 years or older have a substance dependence addiction.
- 970 residents are living with HIV/AIDS.
- 36,005 residents are persons with a mental, physical and/or developmental disability.
- 14,703 residents are victims of domestic violence (such as rape, physical violence and/or stalking by an intimate partner).
- 389 residents in Aurora are experiencing homelessness.

What are the housing and supportive service needs of these populations and how are these needs determined?

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Based on an estimate of PLWHA in jurisdiction (based on CDC 2016 state-level data), there are approximately 970 persons living with HIV/AIDS in Aurora. According to a January 2018 PIT homeless count there are 8 Aurora residents who are homeless living with HIV/AIDS.

The two primary housing resources for PLWHA are Housing Opportunities for Persons With AIDS (HOPWA) which provides long-term, permanent, stable housing and the Ryan White HIV/AIDS Program which provides emergency housing assistance (Hotel/motel vouchers). The City and County of Denver receives approximately \$1.5 million from HUD for HOPWA and approximately \$7 million for Ryan White from the U.S. Department of Health and Human Services. The City of Denver administers these funds for the metro Denver area.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

The City's needs for Public Facilities center on two areas:

- Revitalizing Original Aurora, including the Aurora Cultural Arts District (ACAD) at the core of the Colfax Corridor.
- Improving homeless facilities and affordable housing, and expanding capacity where feasible.

Describe the jurisdiction’s need for Public Improvements:

The City's needs for Public Improvements center on the on-going Alley Paving Program and the Street and Alley Lighting Program in the Original Aurora area, a designated Neighborhood Revitalization Strategy Area (NRSA) by HUD.

Describe the jurisdiction’s need for Public Services:

The City's highest needs for Public Services centered on rental assistance and homeless supportive services, followed by a variety of counseling related to rental and homeowner housing, job training/placement, supportive services for the City's most vulnerable households including survivors of domestic violence, residents with mental health challenges, and residents with substance abuse challenges and criminal records.

How were these needs determined?

These needs were determined through review and analysis of existing funded projects and programs, public meetings, and stakeholder consultation.

Housing Market Analysis

MA-05 Overview

Aurora's ability to accommodate population growth through residential development has encouraged a diverse set of residents and household types. In 2016, 56 percent of Aurora's population belonged to a racial or ethnic minority group, up from 43 percent in 2000. Seniors comprise one-fourth of the City's population. One-third is families with children. This share has been consistent since 2000, which is unusual: Many older suburban areas in Metro Denver have seen their age distributions shift as their residents have aged.

As housing prices continue to rise in neighboring areas where the region's employment is concentrated, Aurora is positioned to capture a larger share of workers who need both affordability and proximity to major employment centers within the City, including the Health Sciences Campus and Denver International Airport, as well as middle income renters who want to become owners.

This growing demand to house more of the region's workers and residents is likely to result in growing affordability challenges. Trends from 2000 shows that high income renters are increasingly drawn to Aurora: Renters earning more than \$50,000 per year now account for half of all renters, up from just 26 percent in 2000. Owners earning \$50,000 or more account for 71 percent of all owners, compared to 58 percent in 2000. Offsetting this growth is a significant decline in low income renters, who have either left the city or experienced income growth.

Currently, the primary market needs in Aurora include:

- 1) A decline in naturally occurring affordable rentals and a resulting increase in the rental gap.
 - a. In 2010, the total gap in 2010 for renters earning \$25,000 and less was 8,907 units renting at \$625/month and less.
 - b. By 2017, the gap had decreased to 7,468 rental units for renters earning \$25,000 and less. The difference was mostly due to a marked decline in low income renters needing affordable units.
- 2) A decrease in the inventory of homes selling at a price point to accommodate public servants and low to moderate income workers. This decrease was dramatic: In 2016 and 2017, 19 percent of homes in Aurora were priced under \$200,000; by 2018, only 10 percent were priced at this level.
- 3) Need for innovative development to accommodate a diverse set of residents. Aurora's aging single family neighborhoods with relatively large lots may need to be repurposed to accommodate new workers; extended families (mother-in-law basement or accessory dwelling unit); seniors desiring cooperative arrangements (flexibility in occupancy restrictions and HOA requirements); and persons with disabilities living in small congregate settings.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

This section provides a broad overview of the types of residential units available in Aurora, including those that target low income residents.

As shown in the table below, a little more than half of the units in Aurora are single family detached homes. Thirteen percent of units are in single family attached products, such as townhomes, rowhomes or duplexes to fourplexes. Thirty-four percent of units consist of apartment complexes ranging from 2-20 units (4% 2-4 units; 16% 5-19 units; and 14% 20 or more units). As shown in the Unit Size by Tenure table below, the City also has a good range of bedroom size for both owners and renters.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	69,071	51.48%
1-unit, attached structure	17,066	12.72%
2-4 units	5,253	3.92%
5-19 units	21,384	15.94%
20 or more units	18,831	14.03%
Mobile Home, boat, RV, van, etc	2,570	1.92%
Total	134,175	100.00%

Table 22 – Residential Properties by Unit Number

Data 2017 ACS 1-Year
Source:

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	234	0.30%	2,301	4.56%
1 bedroom	2,431	3.13%	13,385	26.50%
2 bedrooms	15,127	19.50%	21,450	42.47%
3 or more bedrooms	59,799	77.07%	13,373	26.48%
Total	77,591	100.00%	50,509	100.00%

Table 23 – Unit Size by Tenure

Data 2017 ACS 1-Year
Source:

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

According to HUD's Office of Policy Development and Research (PD&R), Picture of Subsidized Households database, 97 percent of family households that receive assisted housing are considered very low-income in Aurora. Nearly 80 percent of family households that receive assisted housing are minority households. Nearly 20 percent are households with a disability.

The Aurora Housing Authority (AHA) is the primary provider of income-targeted housing in the City. AHA owns and operates seven family developments with 469 units and three senior developments with 213 units.

Residents living in AHA properties are predominately low- to moderate-income, making 50 to 60 percent of the Area Median Income (AMI). In contrast, voucher holders in Aurora have lower incomes: 80 percent of residents with vouchers make 30 percent or less of the AMI. Compared to the Denver region overall, residents living in AHA properties are disproportionately African American/Black (45%) and Asian (17%).

Thirty five percent of voucher holders live with a disability, compared to 11 percent in AHA properties and 9 percent in the region overall.

In typical markets, persons with disabilities have trouble finding accessible units outside of those provided by public housing entities. The ability of voucher holders to access the housing they need in Aurora is unusual and should be an area of continued focus in housing programming. It is important that the City continue to offer grants for home modifications, in owner and rental properties, to maintain accessible housing stock.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

HUD's Multifamily Assistance and Section 8 Contracts Database identifies 15 assisted housing developments in Aurora. Altogether, these properties contain 866 assisted units.

Thirty percent (258 assisted units) have contracts that are expiring within the next five years (between 2019 and 2023), which means these units could be at-risk of being lost from the assisted housing inventory. Seventy-one percent (616 assisted units) are expected to have contracts that are expiring within the next 10 years (between 2019 and 2028), which could contribute to significant loss of the assisted housing inventory stock.

Does the availability of housing units meet the needs of the population?

The 2017 ACS provides the most recent profile and home values, rents and income distribution of Aurora households. To determine how well the current inventory and pricing of housing units meets the needs of Aurora residents, a gaps analysis was conducted. This gaps analysis compares what households can afford to pay in monthly rent or mortgage (including debt service, property insurance and taxes) to the price distribution in the market.

The gaps analysis showed that:

- In 2017, approximately 22 percent of Aurora’s renters—or an estimated 10,842 renters— earned less than \$25,000 per year. These renters are typically single people, single parents and families living in poverty.
- Renters earning less than \$25,000 per year have a hard time finding rental units they can afford. For example, there are an estimated 3,374 rental units in the city, 6 percent of total rental units, with rents \$625 or less per month (accounting for utilities). There are 10,842 renters who need rents this low leaving a gap of 7,468 units.
- Most of the City’s rents fall in the \$875 to \$1,875 range (44% of all rentals) which is not affordable to the lowest income renters. The renters who cannot find affordable rental units are not homeless; rather, they are cost burdened and need to cut back on other household costs to make ends meet. Those who are severely cost burdened, generally the lowest income renters, pay more than 50 percent of their household incomes towards rent and are at risk for homelessness.
- 11,089 renters earn between \$35,000 and \$50,000 and may be interested in homeownership. These renters need homes priced at \$200,000 or less to be able to manage these costs of their mortgage, utilities, property taxes and insurance, etc. An additional 10,934 renters earn between \$50,000 and \$75,000 and need homes priced at less than \$300,000 to attain ownership.

Describe the need for specific types of housing:

As discussed above, the specific types of housing needed include:

- 1) Deeply affordable rentals, renting at less than \$625 per month including utilities, for extremely low income renters;
- 2) Homes priced at less than \$300,000 to accommodate workers in moderate-wage jobs, including public servants; and
- 3) A larger variety of housing products to accommodate aging seniors, persons with disabilities, new families, extended families, and residents needing and preferring supportive and congregate living environments.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

This section discusses changes in the cost of housing based on market and Census data, which capture housing costs reported by residents.

As shown in the table below, the median home value in the City of Aurora increased 107 percent between 2000 to 2017. Similarly, the median rent rose by nearly 90 percent.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2017	% Change
Median Home Value	\$144,600	\$299,600	107%
Median Contract Rent	\$700	\$1,321	89%

Table 24 – Cost of Housing

Data Source: 2017 ACS 1-Year

Most of the City's rental units (44%) are in the \$1,000 to \$1,499 range according to the 2017 ACS, which is well above what renters with housing needs can afford: the greatest need for housing assistance in Aurora is for renters earning \$25,000 and less, needing rents under \$625 per month (including utilities).

Rent Paid	Number	%
Less than \$500	1,286	2.59%
\$500-999	14,587	29.40%
\$1,000-1,499	21,843	44.03%
\$1,500-1,999	8,984	18.11%
\$2,000 or more	2,914	5.87%
Total	49,614	100%

Table 25 - Rent Paid

Data Source: 2017 ACS 1-Year

The following table is based on data from a proprietary dataset maintained by HUD (the Comprehensive Housing Affordability Strategy data, or CHAS). It shows vacant and affordable units and is consistent with the gaps analysis conducted for this Consolidated Plan, which shows very low inventory of affordable rentals and homes to buy for low income households.

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	15	No Data
50% HAMFI	1,180	285
80% HAMFI	1,135	290
100% HAMFI	No Data	105
Total	2,330	680

Table 26 – Housing Affordability

Data Source: 2011-2015 CHAS

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Fair Market Rents, or FMRs, are the rents at which HUD will provide assistance to Housing Choice Voucher holders. When actual market rents are higher than FMRs, renters typically have trouble finding units that they can afford with their voucher. FMRs for 2020 appear to be consistent with the rental market in Aurora.

HOME rents are the maximum amount that may be charged for rent in HOME-assisted rental units and are applicable to new HOME leases and lease renewals after that date. As shown below, HOME rents are much lower than FMRs, and somewhat below market—which helps accommodate the affordability needs of low income households, yet may make it difficult for affordable housing developers to operate affordable developments without additional subsidies in the current high-cost market.

Fair Market Rents, 2020 and HOME Rents 2019

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent (2020)	1,114	1,260	1,566	2,163	2,488
High HOME Rent (2019)	1,029	1,111	1,336	1,534	1,691
Low HOME Rent (2019)	812	870	1,045	1,206	1,346

Table 27 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

No. There is lack of sufficient housing particularity for low to moderate households. For renter households making less than \$25,000 per year, there is a rental gap of 7,468 units.

Increasing rents and home prices have caused more Aurora households to be cost burdened or severely cost burdened. Rental and homeowner households making 30 percent or less AMI are disproportionately *severely* cost-burdened.

Many moderate to low-income renters and persons experiencing and transitioning out of homelessness need affordable housing coupled with supportive services, including mental health services and are most vulnerable to housing needs of severe cost burden, substandard housing condition, and overcrowdedness.

How is affordability of housing likely to change considering changes to home values and/or rents?

As housing prices continue to rise in neighboring Denver and Arapahoe County—areas where the region’s employment is concentrated—Aurora is positioned to capture a larger share of workers who need both affordability and proximity to major employment centers, including the Health Sciences Campus and Denver International Airport, as well as middle income renters who want to become owners. This growing demand to house more of the region’s workers and residents is likely to result in growing affordability challenges for Aurora.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

This section discusses housing condition. It begins by addressing the new HUD requirement for assessing natural disaster risks; describes challenges in housing condition; and concludes with an assessment of lead-based paint risk.

Natural hazard risks. HUD now requires that jurisdictions assess natural hazard risks to low- and moderate-income residents, including risks expected to increase due to climate change.

On February 1, 2016, the U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA) approved the City of Aurora’s Hazard Mitigation Plan as meeting the requirements of the Stafford Act and Title 44 Code of Federal Regulations 2016. The plan was prepared by the Office of Emergency Management and the Aurora fire department. The plan is approved through January 31, 2021.

Hazard mitigation is the use of long- and short-term strategies to reduce or alleviate the loss of life, personal injury, and property damage that can result from a disaster. It involves strategies such as planning, policy changes, programs, projects, and other activities that can mitigate the impacts of hazards. It is impossible to predict exactly when and where disasters will occur, or the extent to which they will impact an area, but with careful planning and collaboration among public agencies, stakeholders and citizens, it is possible to minimize losses that disasters can cause. The responsibility for hazard mitigation lies with many, including private property owners; business and industry; and local, state, and federal government.

The City of Aurora has developed and maintained a hazard mitigation plan (HMP) to reduce risks from natural disasters and to comply with the Disaster Mitigation Act.

Housing Condition Definitions used by the City of Aurora Community Development Department

Standard Condition: A dwelling unit which at the minimum meets the housing quality standards set forth in the Section 8 Program for Housing Quality Standards (HQS) (24 CFR 982.401) with no major defects in the structure and only minor maintenance is required. Such units shall have sound roofs and foundations along with stable floors, walls and ceilings. Units shall also have sound and operational windows and doors in addition to adequate heating, plumbing electrical, water and sewer systems.

Substandard Condition but Suitable for Rehabilitation: A dwelling unit that does not meet Standard Condition which may have some of the of the same issues as a unit in “substandard condition” which may include such things as a leaking roof or deteriorated interior surfaces, however has basic infrastructure such as safe water and adequate sewer system in place and the cost to rehabilitate the dwelling does not exceed 75 percent of the estimated cost of new construction. If rehabilitation costs are expected to exceed 50 percent of the estimated cost of new construction the viability and feasibility of the project must be examined.

Substandard Condition: A dwelling unit with substantial deficiencies including structural defects, lack of complete plumbing, heating, water or sewage systems and for which the cost of rehabilitation would exceed 75 percent of the estimated cost of new construction.

This definition is not intended to prevent the preservation of substandard housing if it is determined that the unit or units should be rehabilitated to achieve other goals including but not limited to the preservation of buildings with historical or architectural significance.

Condition of Units and Need for Owner and Rental Rehabilitation

Aurora has a long history of using HUD block grant funds to rehabilitate homes and rental units occupied by low and moderate income households. The City provides emergency repairs, accessibility modifications, and radon mitigation. Based on the Condition tables below, which are based on 2017 ACS data, the City has many renter- and owner-occupied housing units with condition needs. More than 25,000 renter-occupied households and nearly 20,000 owner-occupied households need some type of rehabilitation. Sixty percent of renter-occupied and more than twenty-five percent owner-occupied housing stock have at least one housing condition in need of rehabilitation.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	19,679	25.36%	26,999	53.45%
With two selected Conditions	375	0.48%	3,078	6.09%
With three selected Conditions	0	0.00%	0	0.00%
With four selected Conditions	0	0.00%	0	0.00%
No selected Conditions	57,537	74.15%	20,432	40.45%
Total	77,591	100.00%	50,509	100.00%

Table 28 - Condition of Units

Data Source: 2017 ACS 1-Year

As shown below, Aurora has more than 20,000 renter-occupied and about 30,000 owner-occupied housing units built before 1980. These units generally have the greatest need for repairs, including lead-based paint remediation.

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	18,190	23.44%	8,092	16.02%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
1980-1999	28,668	36.95%	21,370	42.31%
1950-1979	28,976	37.34%	20,117	39.83%
Before 1950	1,757	2.26%	930	1.84%
Total	77,591	100.00%	50,509	100.00%

Table 29 – Year Unit Built

Data Source: 2017 ACS 1-Year

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Based on the data provided by HUD in the table below, as many as 6,675 renter-occupied and 4,650 owner-occupied housing units have children present and are built before 1980 thereby having some risk of lead-based paint. The risk of lead-based paint is higher in communities like Aurora that have a large supply of historic, older homes, which includes Original Aurora.

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	30,625	43.5%	23,685	44.16%
Housing Units Built before 1980 with children present	4,650	6.61%	6,675	12.45%

Table 30 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units and Suitability for Rehabilitation

Data for this table are not maintained by HUD or the City of Aurora.

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 31 - Vacant Units

MA-25 Public and Assisted Housing – 91.210(b)

This section discusses the beneficiaries and needs of clients of the Aurora Housing Authority. It is based on data provided by AHA for the Regional AI.

Demographics of Aurora Housing Authority Beneficiaries, 2018

AHA Beneficiaries	Race						Ethnicity	
	% White	% Black	% Asian	% American Indian	% Pacific Islander	% MultiRacial	% Hispanic	% Non-Hispanic
Residents living in AHA properties	28%	45%	17%	1%	1%	8%	16%	84%
Voucher holders	N/A	N/A	N/A	N/A	N/A	N/A	9%	91%
Denver Region overall	81%	6%	4%	1%	0%	3%	22%	70%

AHA Beneficiaries	Percent of Area Median Income (AMI)				Other Household Characteristics	
	30% AMI	40% AMI	50% AMI	60% AMI	% Disability	% Single Parent Household
Residents living in AHA properties	3%	3%	17%	78%	11%	40%
Voucher holders	80%	16%	4%	0%	35%	44%
Denver Region overall	11%	N/A	9%	N/A	9%	N/A

Note: Adjusted for beneficiaries for whom race or ethnicity is unknown. Proportions may not total 100% due to rounding.

Source: Aurora Housing Authority, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (<https://egis.hud.gov/affht/>), 2016 1-year American Community Survey, and BBC Research & Consulting.

Residents living in AHA properties are predominately low- to moderate-income, making 50 to 60 percent of the Area Median Income (AMI). In contrast, voucher holders in Aurora have lower incomes: 80 percent of residents with vouchers make 30 percent or less of the AMI. Compared to the Region overall, residents living in AHA properties are disproportionately African American/Black (45%) and Asian (17%).

Thirty five percent of voucher holders live with a disability, compared to 11 percent in AHA properties and 9 percent in the Region overall.

In typical markets, persons with disabilities have trouble finding accessible units outside of those provided by public housing entities. The ability of voucher holders to access the housing they need in Aurora is unusual and should be an area of continued focus in housing programming.

MA-30 Homeless Facilities and Services – 91.210(c)

The table below, from the most recent Continuum of Care, lists and describes services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

CONTINUUM OF CARE IN AURORA – Updated 10/8/18

Emergency Shelters, Temporary & Transitional Housing, Rapid Re-Housing (RRH), Homelessness Prevention (HP) & Permanent Supportive Housing (PSH) Inventory

Agency	Emergency	Temporary (usu 3-6 mos.)	Transitional (up to 2 yrs.)	Rapid Rehousing	Homelessness Prevention	Permanent Supportive	Description/Capacity
Aurora@Home Collaborative Housing Providers: AUMHC, AHA, & Community Housing Partners (CHP)				60 to 65	Inc. in RRH		60-65 – short to medium term rental assistance & case management; AHA - 30 RRH/HP families (inc. ArCO HOME, CoA HOME/CDBG, CoA General, and recently awarded Colorado Division of Housing HOME) AUMHC –20-25 RRH families (MDHI SuperNOFA)
Aurora Mental Health Center (AUMHC)- updated 12 8 17			52			54 are actually PSH, rest are just Perm (229)	TRANS: 52 beds: 15-beds at Aurora Veterans Home; 15-beds at John Thomas House for adults; 16-beds at Nome St for prison re-entry program/Arapahoe jail program 6-beds at Ursula for Wellness Court with Judicial Division OTHER:283 beds/units 10-beds at Fitzsimons Recovery Apts. for homeless adults; 8-beds at Mrachek House for persons with dev. dis. & mental illness; 16-beds at Hanover Street for adults; 25 PSH vouchers – Chronic/adult – MDHI SuperNOFA Bonus 24-units at the Ruth Campbell Apartments; 143-scattered site Section 8 vouchers. 36- Shelter + Care vouchers 17- State Housing Vouchers 4-HOM (homeownership)
Colorado Coalition for the Homeless (CCH): Forest Manor						16	PSH: 86 affordable units at Forest Manor Apartments of which 16 are permanent supportive housing units that serve severe mentally ill persons who were formerly homeless
Housing Authority of the City of Aurora (AHA)			15	18		135	168 vouchers/RRH TRANS:15 Family Unification Program (FUP) vouchers for Youth RRH: 18 families CCH's Family RRH – MDHI SuperNOFA PSH: 135 vouchers: 85+15 RECENT = 100 Veterans Affairs Supportive Housing (VAISH) vouchers 35 Family Unification Program (FUP) vouchers for Families
Gateway Battered Women's Services	24	15					39 beds total for domestic violence shelter, plus cribs: EMERG/OVERNIGHT: 24 beds are emergency TEMP: 15 beds are longer term up to 120 days
Mile High Behavioral Healthcare/Comitis Crisis Center	81	40	18				Shelter and services for 139 beds & overflow during cold weather: EMERG/OVERNIGHT: 81: 25 beds for families 48 beds for single men and women 8 moveable TEMP: 40: 32 beds for TANF families, domestic violence 8 beds for 2 nd chance TRANS: 18 beds for female vets & families - up to 2 years
TOTALs	105 Beds	55 Beds	85 Beds/ Vouchers	78 to 83	Inc. in RRH	417 – 343 are vouchers;74 are Beds/Units	TOTAL 740-745 beds/vouchers/units of which: 245 are emergency/temp./transitional="Homeless" 495-500 are Rapid Rehousing/Homelessness Prevention/Permanent Supportive = not counted as "Homeless" in PIT

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The homeless service delivery system coordinates with public agencies responsible for processing applications for Supplemental Nutrition Assistance Program (SNAP) and health care services, including Medicaid, Medicare, and Veterans benefits, to respond to basic needs for food and health care. Also, Aurora@Home, the City's 10-year plan to end homelessness, has an emphasis on strengthening services with employment providers, mental health and substance abuse providers, to promote housing stability and self-sufficiency. This is accomplished through partnerships designed to reduce the need for emergency hospital and psychiatric visits, integration of SNAP program to reduce the time to process benefits. The Aurora@Home Pilot program for Rapid Rehousing/Homelessness Prevention for 25 families, has a goal to qualify their families to as many mainstream benefits as possible, and the two County Human Service and Workforce Centers are active participants in the Pilot Program.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

This section discusses the needs of non-homeless special needs residents.

HOPWA Assistance Baseline Table

N/A; the City does not receive HOPWA.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, describe their supportive housing needs

Persons with disabilities. Supportive services are a critical component of creating opportunity for people with disabilities to live in integrated settings in the community. These services are particularly important for residents transitioning out of institutional care.

In typical housing markets, persons with disabilities have difficulty finding housing that accommodates their needs. Regulatory barriers on group living arrangements, transit access, housing accessibility and visitability, and proximity to health services, are just some of the opportunity related issues that people with disabilities face.

The regional AI identified the following housing and community barriers for people disabilities: access to transportation, severe shortage of affordable accessible units, lack of emergency housing and/or housing options when evicted, lack of housing resources. The AI also found a need for better compliance with reasonable accommodation requests among landlords.

Elderly/Frail Elderly. The primary need of seniors, expressed by participants in focus groups conducted for this study, is accessible housing. Many seniors in the City occupy townhomes built in the 1980s, which are multi-level accessed by stairs. These units are very difficult to retrofit to make accessible. Accessible, affordable senior housing, as well as moderately-priced multigenerational housing was a primary need expressed by stakeholders and seniors.

Public housing residents. A focus group conducted with AHA residents to support this study found the greatest needs of residents to be 1) Safe and secure neighborhoods; and 2) Better public transportation options to access to senior centers and recreation centers.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Aurora Mental Health Center (AUMHC) is the primary service provider of residents with mental health challenges. AUMHC maintains 310 vouchers/beds/units for persons with mental health illness; operate a crisis center on the Fitzsimons campus with emergency beds; and have developed a triage program to address housing those with mental illness who are frequent users of the emergency medical and hospital system.

In partnership with the Arapahoe Douglas Mental Health Network (ADMHN), the 18th Judicial District covering Arapahoe and Douglas Counties has 54 beds in 27 units of permanent supportive housing for their Wellness Court (Mental Health Court) clients; 12 of these 27 units are in Aurora at Aspen Leaf Apartments.

In the past, the City has provided HOME funding to nonprofits for various housing options to divert clients from jail into permanent supportive housing. The funds requested can be used for a variety of housing options to meet the needs, most likely to include acquisition/rehabilitation of one or more group homes.

Aurora does not have programs that specifically assist persons returning from physical health institutions; however, to the extent they qualify, these individuals would be eligible to receive support from the housing and supportive service providers listed that assist low income and special needs residents in Aurora.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

For PY2020, the City of Aurora will continue its past activities to address housing and supportive service needs by:

- 1) Investing in the construction and acquisition and rehabilitation of affordable housing with supportive services. In the past, the City has had a goal to construct or acquire/rehabilitate 100-150 units of affordable housing with a component of permanent supportive housing over five years. The City invests HOME, CDBG (infrastructure), and CHDO support to reach this goal.
- 2) The City also plans to continue CDBG and/or ESG funding to nonprofit partners for operations dollars to support the needs of special needs residents.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Aurora completed an Assessment of Fair Housing in 2018 and 2019, as part of a regional effort. That study examined a range of barriers to housing choice, including the negative effects of public policies on development of affordable housing.

In focus groups, private sector developers expressed challenges with moving development proposals through the zoning and permitting processes and noted that streamlining the development approval process could potentially lower the price of newly constructed starter homes. Private multifamily developers did not express an interest in incentives for providing affordable housing.

Nonprofit and affordable developers said the primary barrier to creating housing for very low income renters is lack of funding. One developer who serves persons with disabilities has eleven different funding sources for one medium-size development project. Because federal funding has been limited for years and is unlikely to increase, it is imperative that funding to support affordable housing be contributed from local, private, and foundation sources to support the renters that the private sector does not serve.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

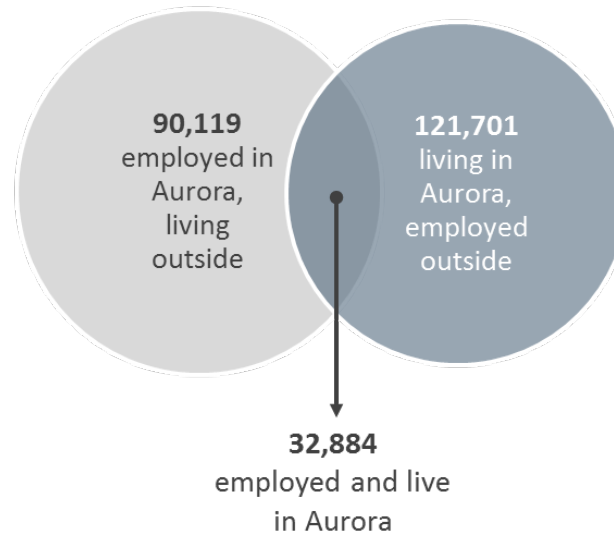
This section provides an overview of business activity, labor force statistics, and the economy in general for Aurora.

Economic Development Market Analysis

Aurora has been a major player in accommodating the Denver metro region’s economic growth through residential development. Currently, the vast majority of Aurora residents work outside of the City—signaling that more housing opportunity in the City than jobs.

Inflow and Outflow of Primary Jobs, Aurora, 2015

Source:
US Census Bureau’s Longitudinal Employer-Household Dynamics and BBC Research & Consulting.



According to the Longitudinal Employer Household Dynamics data, 32 percent of Aurora residents work in the City and County of Denver; 21 percent work in Aurora. The next most common city is Greenwood Village at a much lower 6 percent. Aurora workers are most likely to live in Aurora (27%), followed by Denver (20%), and then Centennial (much lower 4%).

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The business activity table below compares where Aurora residents work with jobs available in the City.

Employees working in Aurora are primarily in the health and social services, retail, or educational services industries, earning between \$26,000 and \$40,000 on average. This is also the largest employment sector in the City. Equally large are jobs in the Professional, Scientific, and Management Services fields, which command higher salaries—however, fewer Aurora residents work in these fields (13%), meaning they commute into Aurora from other cities.

The Arts, Entertainment, Accommodations industries contribute to 12 percent of both workers and jobs and Retail Trade at 11 percent of workers and 10 percent of jobs.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	1,621	14,833	0.83%	1.01%	0.18%
Arts, Entertainment, Accommodations	22,748	172,159	11.67%	11.75%	0.08%
Construction	16,896	93,964	8.67%	6.41%	-2.25%
Education and Health Care Services	37,727	280,048	19.35%	19.12%	-0.24%
Finance, Insurance, and Real Estate	15,778	113,939	8.09%	7.78%	-0.32%
Information	6,447	51,844	3.31%	3.54%	0.23%
Manufacturing	10,944	65,083	5.61%	4.44%	-1.17%
Other Services	10,799	46,273	5.54%	3.16%	-2.38%
Professional, Scientific, Management Services	25,973	277,096	13.32%	18.92%	5.59%
Public Administration	6,819	60,058	3.50%	4.10%	0.60%

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Retail Trade	22,094	149,570	11.33%	10.21%	-1.12%
Transportation and Warehousing	11,957	62,982	6.13%	4.30%	-1.83%
Wholesale Trade	5,123	77,006	2.63%	5.26%	2.63%
Total	194,926	1,464,855	100.00%	100.00%	

Table 32 - Business Activity

Data Source: 2017 ACS 1-Year and U.S. Census Bureau Quarterly Workforce Indicators (QWI), 4th Quarter 2017

Describe the workforce and infrastructure needs of the business community. How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

A college degree at a minimum (or equivalent experience) is necessary for Aurora’s two largest major employment sectors— Education and Health Care Services and Professional, Scientific and Management Service. Of the 160,163 employed in Aurora (25 years of age or older), only 33 percent have a bachelor’s degree or higher. For Professional, Scientific, Management Service industries there are 6 percent more available jobs than workers.

The figure on the following page captures the differences between people living in Aurora and working in Aurora, as well as the average wages by profession. Differences in the bars indicate the largest gaps, which occur in Accommodation and Food Services; Educational Services; Health and Social Services; and Agriculture.

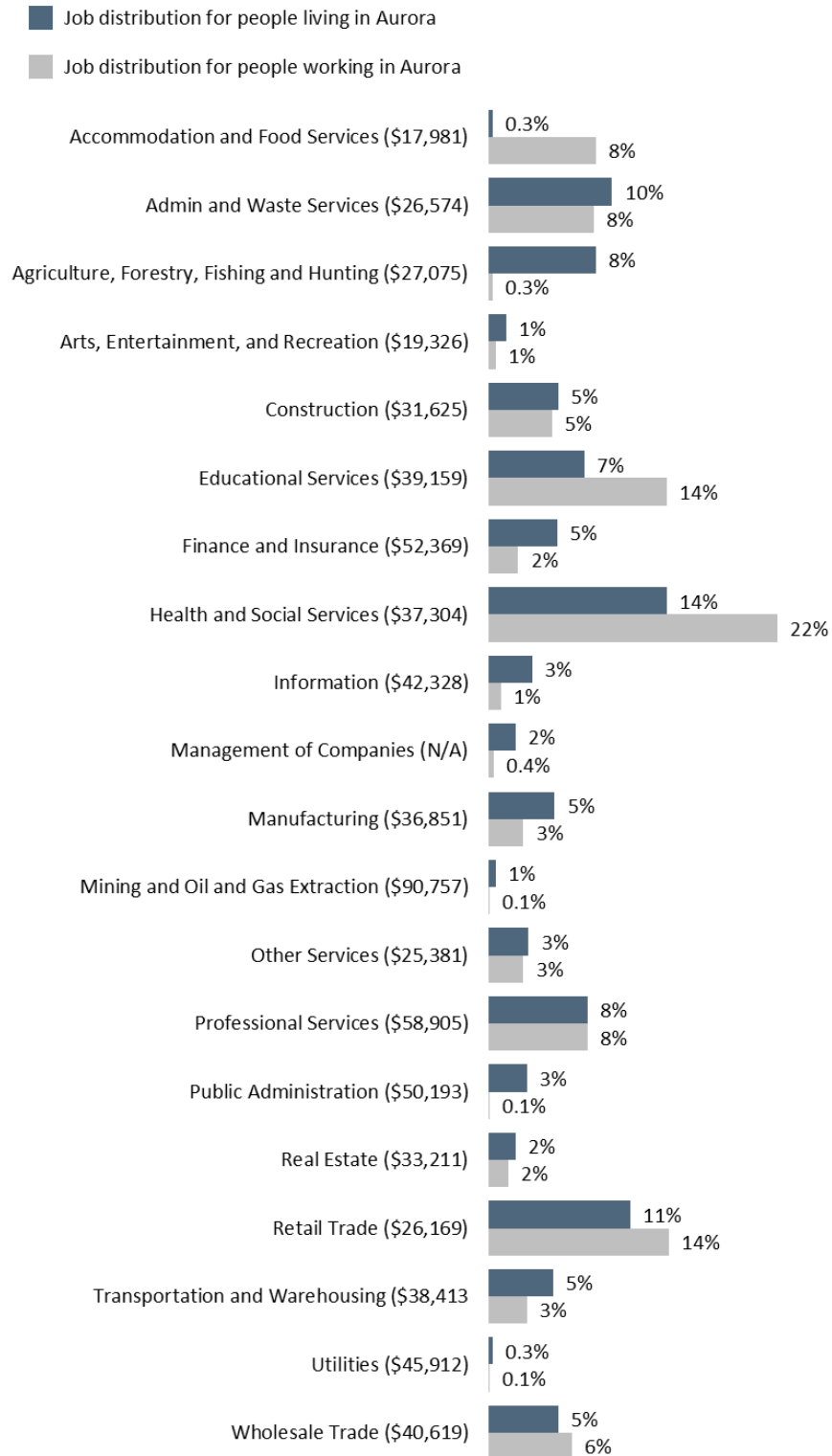
Employment and Earnings by Industry, Aurora, 2015

Note:

People who both live and work the City are included in both distributions.

Source:

US Census Bureau's Longitudinal Employer-Household Dynamics, 2016 1-year ACS, and BBC Research & Consulting.



Labor Force

Total Population in the Civilian Labor Force	204,317
Civilian Employed Population 16 years and over	194,926
Unemployment Rate	4.60%
Unemployment Rate for Ages 16-24	12.85%
Unemployment Rate for Ages 25-65	3.82%

Table 33 - Labor Force

Data Source: 2017 ACS 1-Year and U.S. Census Bureau Quarterly Workforce Indicators (QWI), 4th Quarter 2017

Occupations by Sector	
Management, business and financial	65,479
Farming, fisheries and forestry occupations	18,937
Service	41,667
Sales and office	46,217
Construction, extraction, maintenance and repair	22,626
Production, transportation and material moving	65,479

Table 34 – Occupations by Sector

Data Source: 2017 ACS 5-Year

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	95,733	52.72%
30-59 Minutes	67,748	37.31%
60 or More Minutes	18,122	9.98%
Total	181,603	100%

Table 35 - Travel Time

Data Source: 2017 ACS 5-Year

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	18,753	1,429	6,815
High school graduate (includes equivalency)	42,224	2,261	10,338
Some college or Associate's degree	46,764	1,558	10,643
Bachelor's degree or higher	52,422	1,003	6,409

Table 36 - Educational Attainment by Employment Status

Data Source: 2017 ACS 5-Year

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	389	2,789	4,041	5,208	2,374
9th to 12th grade, no diploma	4,306	3,802	5,017	6,140	2,300
High school graduate, GED, or alternative	12,724	16,235	14,317	24,312	10,329
Some college, no degree	10,045	13,840	9,169	18,713	9,410
Associate's degree	1,598	5,001	3,323	9,419	2,826
Bachelor's degree	3,596	14,172	12,540	14,636	8,292
Graduate or professional degree	187	6,134	5,190	7,408	4,856

Table 37 - Educational Attainment by Age

Data Source: 2017 ACS 5-Year

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	24,114
High school graduate (includes equivalency)	32,329
Some college or Associate's degree	40,141
Bachelor's degree	50,318
Graduate or professional degree	55,150

Table 38 – Median Earnings in the Past 12 Months

Data Source: 2017 ACS 5-Year

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create. Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)? If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

No, the City does not participate in a Comprehensive Economic Development Strategy (CEDS).

Technology/Broadband Access Needs

Access to broadband has increasingly become a necessity versus a luxury. Yet, according to the Federal Communications Commission (FCC), in 2017, 34 million Americans still lack broadband internet access (defined as a minimum of a 25 Mbps connection). People who lack access are increasingly unable to take advantage of economic and educational opportunities as those who do have access.

According to 2017 ACS data, in Aurora, 6,454 residents do not own a computer. 14,218 (11%) of Aurora residents do not have an Internet subscription, and another 14,275 rely on a cellular data plan to access the Internet.

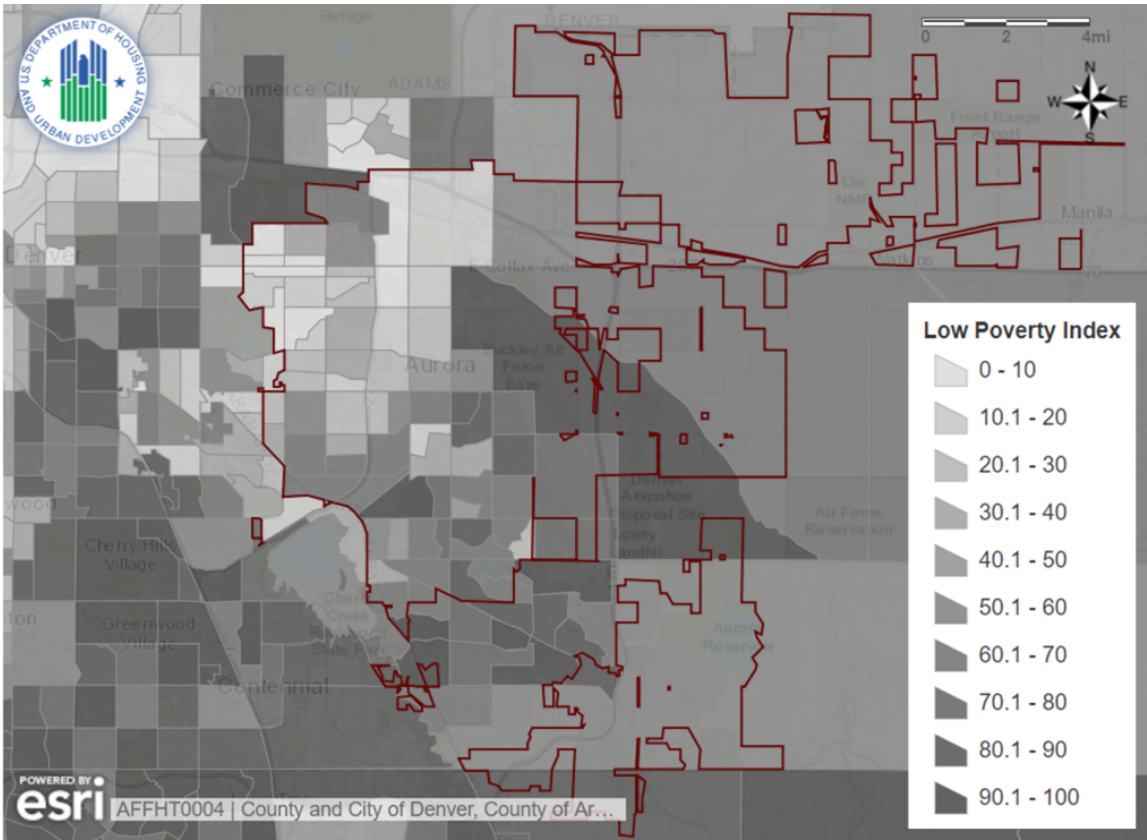
MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The map below shows the areas of Aurora with concentrations of poverty which correlate with housing problems. HUD's "low poverty index" measures a neighborhood's exposure to poverty—a higher scores mean better access to economically strong (low poverty) neighborhoods.

The HUD map shows that the northwest area of the City—old Aurora—has concentrations of high poverty neighborhoods. In contrast, the more rural and suburban areas of Aurora have concentrations of low poverty neighborhoods.

Geographic Distribution of Poverty, Aurora, 2016

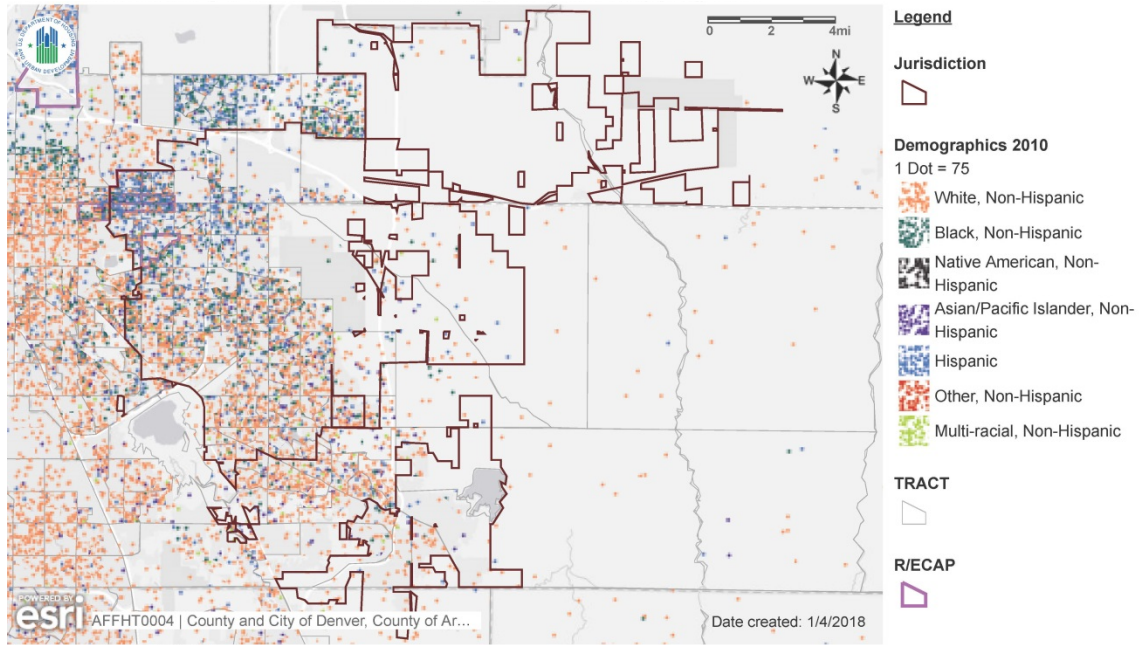


Source: HUD AFFH Data and Mapping Tool, version 4.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

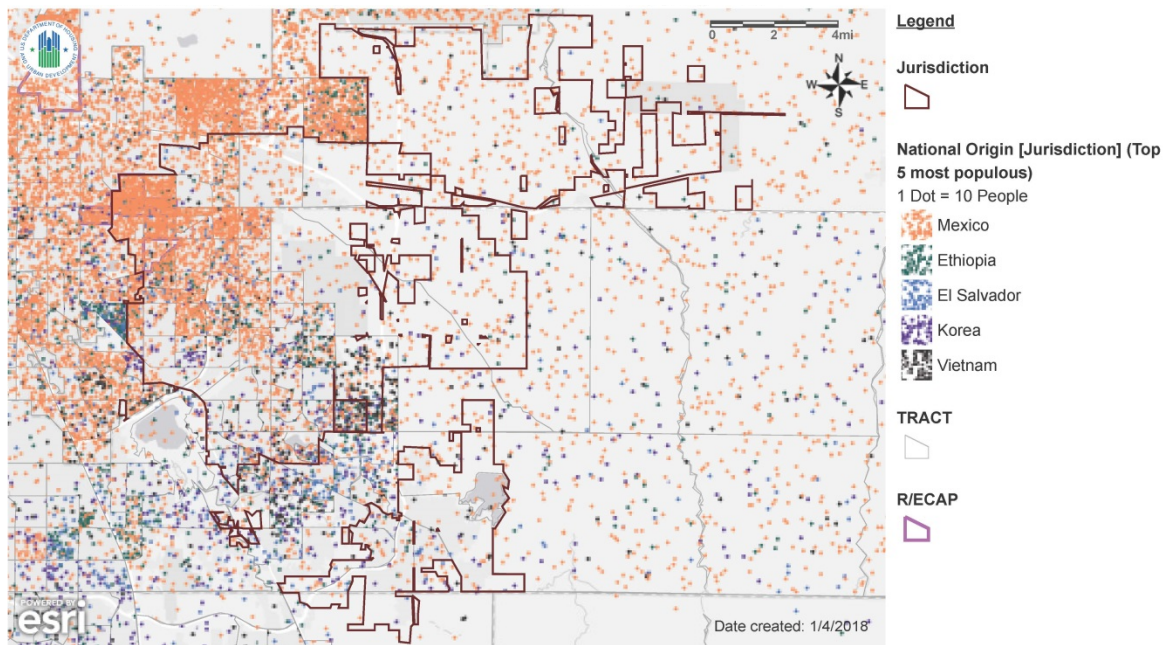
The maps below show areas in Aurora where Aurora's residents of Hispanic descent, African Americans, residents of Mexican national origin, and Limited English Proficiency (LEP) residents are located. These residents are largely concentrated in the northwest portion of the City, where the City's Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) are also located.

Race/Ethnicity, 2010, Aurora



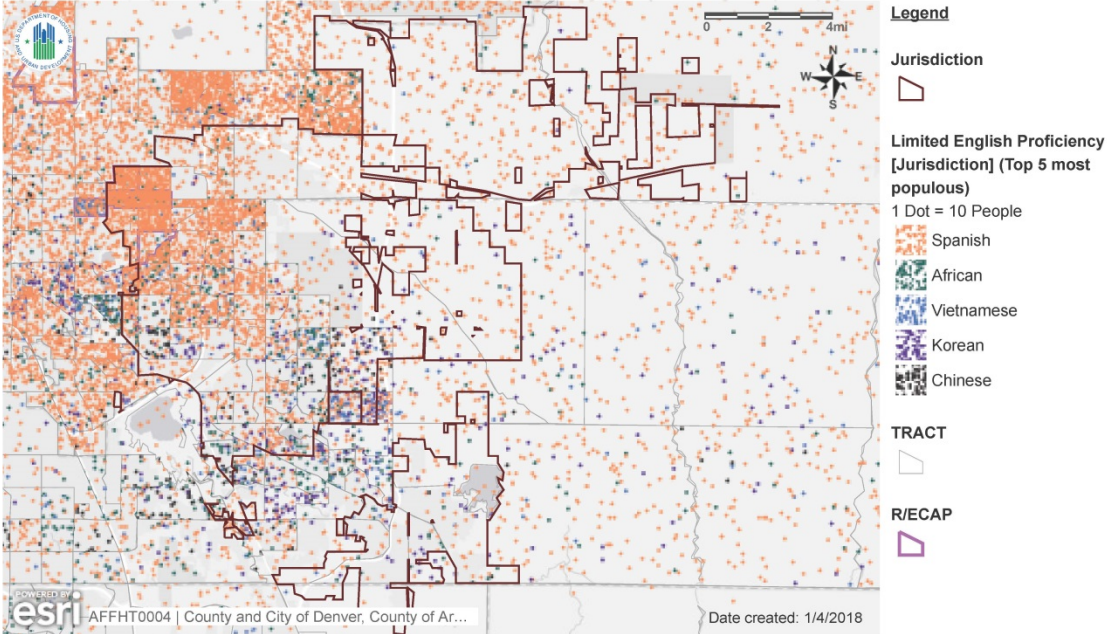
Source: HUD AFFH Data and Mapping Tool, version 4.

National Origin, Aurora



Source: HUD AFFH Data and Mapping Tool, version 4.

Limited English Proficiency (LEP), Aurora



Source: HUD AFFH Data and Mapping Tool, version 4.

What are the characteristics of the market in these areas/neighborhoods? Are there any community assets in these areas/neighborhoods? Are there other strategic opportunities in any of these areas?

As discussed above, areas of poverty racial, ethnic, national origin, and LEP concentration in Aurora are also areas “Racially or ethnically concentrated areas of poverty,” also known as R/ECAP.

HUD’s definition of an R/ECAP is:

- A census tract that has a non-white population of 50 percent or more (majority-minority) or, for non-urban areas, 20 percent, AND a poverty rate of 40 percent or more; OR
- A census tract that has a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the county, whichever is lower.

Households within R/ECAP tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. By definition, a significant number of R/ECAP households are financially burdened, which severely limits housing choice and mobility. The added possibility of racial or ethnic discrimination creates a situation where R/ECAP households are likely more susceptible to discriminatory practices in the housing market. Additionally, due to financial constraints and/or lack of knowledge (e.g., limited non-English information and materials), R/ECAP households encountering discrimination may believe they have little or no recourse, further exacerbating the situation.

Both Aurora and Denver have five R/ECAPs, yet Aurora has a larger proportion of residents living in R/ECAPs. Unlike other areas in the region, almost all of Aurora's R/ECAPs are clustered together in the same neighborhood, East Colfax.

East Colfax is located in northwestern Aurora and is the longest commercial corridor in the metropolitan region. Prior to the construction of Interstate 70 in 1965, Colfax Avenue was the primary east/west transportation corridor. Its modern-day land use still reflects its former status: An abundance of motor coach motels—that largely operate as affordable housing of last resort—can be found on both sides of the Denver/Aurora border. Numerous car-oriented businesses and retail complement the motels as the rest of the land use.

Community assets include some of the richest cultural diversity in the state; proximity to the Fitzsimmons Health Care campus; proximity to light rail and major highways and the Denver International Airport; and considerable redevelopment potential. Private sector investment is anticipated to grow in the area as the neighborhood transforms. Although this investment is welcome and much needed in many parts of the corridor, preservation of existing housing stock will be a growing concern.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The 2020-2024 Consolidated Plan is designed to create a link between the identified needs of Aurora's low to moderate-income and special needs populations and the resources of HUD's Community Development Block Grant (CDBG), Home Investment Partnership (HOME) and Emergency Solutions Grant (ESG) funding and other public/private investments. The Five-year Plan establishes objectives and strategies to address the needs over the next five years in three areas: provide decent housing, provide a suitable living environment, and provide expanded economic opportunities.

The City intends to retain high level goals of continuing neighborhood revitalization efforts; expanding affordable housing; and assisting extremely low income residents, residents experiencing homelessness, and special needs residents with supportive service needs.

To this end, Aurora will continue to build on its successful projects and programs in homeownership and rehabilitation that meet the needs of low and moderate income residents, and will expand its projects and programs for affordable rental options and address homelessness/at-risk of homelessness. Projects selected for funding in the five year period will be managed as efficiently as possible in order to address a wide range of issues that exist in Aurora.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 39 - Geographic Priority Areas

The City will retain the Original Aurora Neighborhood Revitalization Strategy Area (NRSA) for this plan. This NRSA has been in place since 1999. The general boundaries of Original Aurora are Yosemite Street on the west, I-225 on the east, East 6th Avenue on the south, and the City border on the north.

This area, known to residents as “Original Aurora,” contains the City’s oldest housing stock, including many historic motels that have aged and now serve as de facto temporary and transitional housing for extremely low income residents who cannot find affordable rentals. Commercial properties exhibit a mix of conditions with new private sector investment concentrated in the north and northeast portion of the NRSA to serve the redeveloped Fitzsimmons medical campus and service the Stapleton neighborhood.

Primary challenges and needs in the area include: 1) Very substandard housing conditions, including motel units; 2) Aging and dilapidated commercial properties; 3) High poverty; 4) High crime; 5) Limited grocery options;

The programs funded and implemented by the Community Development Division, especially the Housing Rehabilitation and Home Ownership Assistance Programs (HOAP), are available to assist income eligible households citywide. Even so, the area of greatest need continues to be Original Aurora. The City will continue to target resources in the Original Aurora neighborhoods, in pursuit of the goals and objectives set forth in the established Neighborhood Revitalization Strategy. Those goals include:

- Foster a Supportive Business Environment:
- Promote Homeownership
- Improve the Housing Stock
- Improve the Neighborhood Setting
- Strengthen the Economic Vitality of the Community
- Engage and Empower the Community

SP-25 Priority Needs - 91.215(a)(2)

HUD requires an identification of priority needs that will guide allocation of block grant funds during the Five-year Consolidated Planning period. Those priority needs are summarized below.

The City of Aurora based the priority needs on:

- 1) Findings from the City's new housing market analysis and needs identified in the Housing Strategy;
- 2) Stakeholder consultation and citizen input from this Plan and the AI;
- 3) Regionally coordinated efforts to address and prevent homelessness;
- 4) Continued need to revitalize commercial property and improve neighborhood amenities in Original Aurora;
- 5) Growing need to preserve naturally occurring affordable rental and ownership housing;
- 6) Increasing need to expand the inventory of deeply affordable rentals to ownership products for low and moderate income households;
- 7) Expanding service demands of nonprofit partners, to serve the growing number of residents who are economically vulnerable and need supportive services.

Priority Needs

EXPAND ECONOMIC OPPORTUNITIES

ADDRESS AND MITIGATE HOMELESSNESS

RETAIN AND EXPAND AFFORDABLE HOMEOWNERSHIP

EXPAND INVENTORY OF AND PRESERVE AFFORDABLE RENTAL HOUSING

IMPROVE INFRASTRUCTURE IN NRSA

FACILITATE URBAN RENEWAL IN NRSA

SUPPORT PUBLIC SERVICE ORGANIZATIONS SERVING EXTREMELY LOW INCOME AND VULNERABLE RESIDENTS

The resident groups that are a focus of the priority investments include:

Population:*
Income Level:
Extremely Low: X
Low: X
Moderate: X
Middle: Addressed through Housing Strategy
Family Types:
Large Families: X
Families with Children: X
Elderly: X
Public Housing Residents: X
Homeless:
Rural: N/A
Chronic Homelessness: X
Individuals: X
Families with Children: X
Mentally Ill: X
Chronic Substance Abuse:
Veterans:
Persons with HIV/AIDS:
Victims of Domestic Violence: X

Unaccompanied Youth:

Non-homeless Special Needs:

Elderly: X (primarily through homeownership rehabilitation)

Frail Elderly:

Persons with Mental Disabilities: X

Persons with Physical Disabilities: X

Persons with Developmental Disabilities: X

Persons with Alcohol or Other Addictions:

Persons with HIV/AIDS and their Families:

Victims of Domestic Violence: X

Non-housing Community Development: X

Target Areas Affected:

Neighborhood Strategy Revitalization Area (NRSA)

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

The anticipated market conditions that will influence the use of funds during the Five-year Consolidated Planning period include:

- 1) A rental market with a vacancy rate of less than 5 percent. Aurora has historically been an affordable community in the Denver metro area; however, this has changed with growing demand for housing in the region. Rents in the City of Aurora alone have increased by more than 80 percent since 2000. If the market continues to be tight throughout the Five-year Consolidated Plan period, the City will continue to fund creation of new affordable rental units and support low income households through rental assistance (TBRA).
- 2) Growing gaps in homeownership and ability to attain ownership. A decline in affordable homeownership products due to continued demand in the housing market may lead to a shift in funding towards creating affordable homeownership products.
- 3) Private sector investment in older communities, including Original Aurora. If private sector investment accelerates in the City's areas in need of revitalization, the City may shift funding for NRSA activities to focus more heavily on preservation and anti-displacement.
- 4) Availability of land and funding—particularly with expanded resources at the state level—may also influence the allocation of funding to leverage other resources as much as possible.

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

At the time this Plan was developed, the City's allocation for the 2020 program year (PY2020) was unknown. The City's Action Plan is based on funding received in the 2019 program year; it assumes that funding for PY2020 year will approximate 2019 levels. As such, the City's Five-year resources are based on PY2019 funding. If funding amounts are substantially different from PY2019 funding, this plan will be amended.

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	\$2,852,955	\$200,000		\$3,052,955	\$11,400,000	Expected amount represents four years of funding at \$2.85 million per year
HOME	Public-federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$1,133,568	\$500,000		\$1,433,568	\$4,400,000	Expected amount represents four years of funding at \$1.1 million per year

ESG	Public-federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$246,431			\$246,431	\$1 million	Expected amount represents four years of funding at \$250,000 per year
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Table 40 - 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

HOME Match. HUD requires a local cash match of the HOME allocation of 22.5 percent (total grant less admin). These funds are provided by the City General Fund. In 2019, \$278,733 was the required match and is assumed to be the same for 2020. The resource is not included above in Table 5. The matching funds are used specifically for HOME eligible activities.

The City also waives development review fees/building permit fees and material taxes on housing developments constructed by AHA, or when AHA is a partner (AHA is a 0.01% partner and provides property and material tax exempt status, as well as city review fee waivers).

ESG Match. HUD requires a local cash match of the ESG of 100 percent, currently at \$241,052 for 2019 and assumed to be the same for 2020. Agencies funded in 2019 will be expected to provide the required match. In most circumstances, the agencies receive their match dollars from funding provided to them by other city general funds.

State resources. The City looks forward to several new opportunities to leverage federal and local funds with state resources. During the 2019 legislative session, the state legislature increased the amount of funding that the Colorado Division of Housing (CDOH) will receive by \$7 million for two fiscal years, and then \$77 million per year for three years. The legislature also approved a bill that required state agencies to inventory underutilized land they own for the potential to repurpose into residential, mixed-income use.

Other contributions from the City have historically included:

- The Northwest Aurora Alley Paving Program has been supplemented by City General Funds which vary each year.
- The Original Aurora Street and Alley Lighting Program has been supplemented by City General Funds. Xcel Energy provides the alley lights free of charge if they are under a certain price.
- Over the years, the City's Development Services/Urban Renewal Authority (AURA) Division has purchased buildings and properties in Original Aurora, particularly the Aurora Cultural Arts District (ACAD) with City funding. These properties have been pivotal in the revitalization of Colfax Avenue.
- Privately leveraged funds for CDBG, HOME, and ESG projects have totaled over \$2 million per year in the past.

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

The City of Aurora does not have significant land ownership, other than parks, that it can repurpose to address the needs identified in this Consolidated Plan. However, a new state law could mean that state land might be made available for affordable housing development. House Bill 19-1319, passed in the 2019 legislative session, requires that "No later than October 15, 2019...each Colorado state agency and state institution of higher education to submit to the capital development committee (committee) a list of all undeveloped real property owned by or under the control of the agency or institution. The bill defines "nondeveloped real property" to mean unimproved real property that is not otherwise protected for or dedicated to another use such as an access or a conservation easement. Each year thereafter, HB19-1319 will also require each agency or institution to submit to the committee any additions or deletions to the list identifying any undeveloped real property the agency has acquired or disposed of during the preceding state fiscal year.

Knowledge of all state-owned land within the City of Aurora's boundaries could help the City's public works department support the City in real estate transactions and expand affordable housing opportunities.

The following are City owned/or partner-owned properties that may be used to address the needs identified:

- 17th & Paris - Vacant, near Paris ES, zoned FBAD - City owned 0.75 ac. The City is currently investigating developing this parcel as part of the Governor's Permanent Supportive Housing Toolkit.
- 19th & Fitzsimons - APD vehicle storage, on Fitzsimons - City owned - 0.75 ac
- Idalia & Mexico - Vacant, zoned PD for 54 townhomes - Owner in default to City - 5.0 ac

Aurora Housing Authority does own parcels that will be redeveloped into publicly-assisted housing.

- 30th & Peoria - Vacant, near I-70 light rail - 5.0 ac
- 16th & Fulton - Vacant, near Crawford ES, zoned B-2 - 0.75 ac
- Kentucky & Ironton - Vacant portion of Village at Westerly Creek - 11.0 ac total zoned for 225 units; 130 units for seniors on 5-6 ac.

The following property is owned by Community Housing Partners (formerly Aurora Housing Corporation): 17th & Hanover/Havana - Vacant, zoned R-4, 0.75 ac

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
AURORA	Government	Economic Development Ownership Planning neighborhood improvements public facilities	Jurisdiction
Arapahoe County Human Services	Government	Homelessness Non-homeless special needs Planning public services	Jurisdiction
Adams County Human Services	Government	Homelessness Non-homeless special needs Planning public services	Jurisdiction
Arapahoe/Douglas Works! Workforce Center	Government	Planning public services	Region
METRO DENVER HOMELESS INITIATIVE	Continuum of care	Homelessness Planning	Region
AURORA HOUSING AUTHORITY	PHA	Homelessness Non-homeless special needs Planning Public Housing Rental	Jurisdiction

Table 41 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Aurora has a small number of housing and supportive services providers who work together cooperatively; this includes the Aurora Housing Authority. The City Community Development Division (CD)

administers many of the larger programs that that receive CDBG and HOME funding, namely the rehabilitation and ownership programs. The City also uses CDBG dollars to fund neighborhood improvements, such as alley paving, lighting and other public facilities, and Code Enforcement.

When asked about gaps in institutional structure, stakeholders consulted for this plan offered the following observations:

- 1) HUD’s focus on permanent supportive housing relative to transitional housing creates barriers for residents who need to live in a service-enriched environment before they are ready to become independent renters. This includes residents with criminal history backgrounds and survivors of domestic violence. Lack of resources for transitional housing create a gap in institutional structure and housing and services delivery.
- 2) Programs that require stable housing before residents can receive services are finding that services are increasingly difficult to deliver because residents cannot find housing.
- 3) Limited information about housing availability. It takes a full time staff member to help clients secure housing.
- 4) Unwillingness of landlords to accept higher risk tenants.
- 5) Significant need for more tenant based rental assistance to stabilize tenants who cannot find housing.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance			
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS			
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	

Table 42 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

In the Denver metro area, many of the housing and services targeted to assist persons who are chronically homeless or with HIV/AIDS are provided through non-profits in central Denver, as this is where many of the region’s shelters and transitional housing programs are located.

There are 30 or more non-profits that serve Aurora’s homeless and/or at-risk of homelessness population with housing and services as listed in the earlier chart in MA-30. Many services are funded, such as mental health care, child care, etc., but are not funded to the level needed.

Another gap that has been identified on a metro Denver area basis is providing services to people leaving institutions, such as ex-offenders, persons making an efficient transition from emergency shelters to transitional housing. Recently, meetings have begun to coordinate key partners on the Fitzsimons/Anschutz Medical Campus to address homeless persons leaving the

hospital, particularly those that are medically fragile. Currently, the nearby Comitis Crisis Center does not have the capacity to serve this vulnerable population.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The City has a strong, dedicated and efficient network of service providers who deliver the programs funded by HUD block grants. Yet the needs in Aurora are vast relative to resources, and institutional structure could be strengthened through an expanded commitment by private partners, such as foundations, and increased federal, state, and local resources.

During the development of this Consolidated Plan, a focus group with partners identified the following challenges with institutional structure and delivery of services:

- Inadequate safety net for people who are on the edge of poverty and homelessness;
- Lack of resources to address the significant needs of very low income residents;
- Limited participation and interest by the private sector (largely landlords) in addressing needs;
- Overburden that service providers face in “addressing problems that are created by others.”

One of Aurora's strategies to overcoming gaps is demonstrated in the Aurora@Home program with an emphasis on rapid rehousing and homelessness prevention coupled with case management services for families with children the pilot program has a Navigator that works to connect the families to mainstream resources and employment centers.

Aurora will continue to explore ways to increase funding dedicated to supportive shelter/housing, and service provision, outside of the three federally dedicated HUD funding sources that are primarily limited to bricks and mortar projects. Also, in years where a large amount of CDBG program income is received, allowing the Public Service cap of 15 percent to be increased, the city will identify homeless service providers that can be allocated additional funding, as well as needed items such as bus passes and laundry vouchers.

SP-45 Goals Summary – 91.215(a)(4)

The following tables summarize the goals and outcomes anticipated for the 2020-2024 Five-year planning period.

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicators (1 and 5 year)
Support CDBG Activities	2020	2024	Administration		ECONOMIC OPPORTUNITIES HOMELESS HOMEOWNERSHIP INFRASTRUCTURE PUBLIC SERVICES AND FACILITIES RECREATIONAL AND CULTURAL FACILITIES/PROGRAMS RENTAL HOUSING (APARTMENTS, ETC.) SENIORS AND/OR DISABLED SINGLE FAMILY HOUSING REHABILITATION URBAN RENEWAL	CDBG overall: \$570,000 in PY2020; \$2.85 million PYS2020-2024	Other: 1

Revitalize and make Public and Commercial Improvements in Designated NRSA	2020	2024	Non-Housing Community Development	ORIGINAL AURORA NEIGHBORHOOD REVITALIZATION STRATEGY	INFRASTRUCTURE URBAN RENEWAL	<p>CDBG: \$675,000 PY2020, \$3.4 million 5 year, business/face improvements</p> <p>\$300,000 PY2020, \$1.5 million 5 year, alley paving/infrastructure</p> <p>\$200,000 P2020, \$1 million 5 year, pilot fence improvement program</p>	<p>Public facility or infrastructure activities (not Low/Mod area benefit): 3,000 persons assisted per year (may be duplicated across years)</p> <p>Facade treatment/business rehabilitation: 2 businesses per year, 10 5 year</p>
Promote Tenant and Homebuyer Knowledge and Awareness	2020	2024	AFFORDABLE HOUSING		HOMEOWNERSHIP RENTAL HOUSING	<p>CDBG: \$275,000 PY2020, \$1.4 million 5 year</p>	<p>Public services: 700 households assisted per year, 3,500 5 year</p>

Preserve Existing Affordable Housing and Expand Accessibility in Housing	2020	2024	AFFORDABLE HOUSING	ORIGINAL AURORA NEIGHBORHOOD REVITALIZATION STRATEGY	SINGLE FAMILY HOUSING REHABILITATION	CDBG: \$75,000/\$375,000 Emergency Repairs \$40,000/\$200,000 Tree Removal \$50,000/\$250,000 Accessibility Modifications \$50,000/\$250,000 Radon Mitigation \$400,000/\$2 million lead hazard mitigation and program delivery (city rehab techs) HOME (loans): \$250,000/\$1.25 million	Homeowners assisted with CDBG: 75 Emergency Repairs per year, 375 5 year 5 Accessibility Modifications per year, 25 5 year 10 Radon Mitigation per year, 50 5 year Homeowners assisted with HOME: 15 per year, 75 5 year
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Prevent Homelessness	2020	2024	HOMELESSNESS		HOMELESS	HOME: \$200,000/\$1 million	Tenant based rental assistance/Rapid Rehousing: 10 households assisted per year, 50 5 year
Support Operations of Organizations Serving Special Needs Residents, including those experiencing Homelessness	2020	2024	HOMELESSNESS		HOMELESS	ESG: \$240,000/\$1.2 million	Persons assisted in overnight shelter: 2,500 persons per year, 12,500 5 year
Support HOME Administration	2020	2024	AFFORDABLE HOUSING		AFFORDABLE HOUSING	HOME: \$113,000/\$565,000	Other: 1
Support CHDOs	2020	2024	AFFORDABLE HOUSING		AFFORDABLE RENTAL HOUSING	HOME: \$170,000/\$850,000	Other: 1

Create and Preserve Affordable Rental and Homeowner Housing	2020	2024	AFFORDABLE HOUSING		AFFORDABLE HOUSING (RENTAL AND OWNERSHIP)	CDBG: \$400,000/\$2 million HOME: \$600,000/\$3 million	Rental or ownership units constructed: 180 units per year, 900 5 year Rental units rehabilitated: 20 units per year, 100 5 year
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Table 43 – Goals Summary

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2).

The number of households anticipated to be assisted include the following goals for year 1 and years 1-5:

Rental Assistance: 0-30% AMI (TBRA)

- 2020: 10
- 2020-2024: 50

New Construction of multi-family: 0-60% AMI

- 2020: 180
- 2020-2024: 900

Rehabilitation of multi-family: 0-80% AMI

- 2020: 55
- 2020-2024: 275

Rehabilitation of single-family: 0-80% AMI

- 2020: 55
- 2020-2024: 275

Acquisition: 0-80% AMI

- 2020: 20
- 2020-2024: 100

TOTAL

2020: 320

2020-2024: 1,600

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

AHA meets the 504 requirements.

Activities to Increase Resident Involvements

Please see Section MA-25.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the ‘troubled’ designation

N/A.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

A regional Analysis of Impediments to Fair Housing Choice (AI) was conducted in 2018, which included an update assessment of barriers to affordable housing. This study covered barriers to housing choice, as well as barriers to creating affordable housing.

Overall in Aurora, barriers to choice were low to moderate, compared to other jurisdictions.

The two areas where Aurora residents face the most barriers are in:

- Displacement caused by investors selling rental units. This was much higher than in the region and in any other jurisdiction; and
- Concerns about safety in affordable housing communities and surrounding neighborhoods.

As part of the development of the **City of Aurora Housing Strategy**, focus groups were conducted with private and nonprofit developers who build rental and for sale housing in Aurora. Those developers identified the following barriers to affordable housing development:

- For nonprofit developers: Increased funding is imperative if they are to continue to build housing. The federal government has reduced its support for new development and there are no indications that this will change in the future. Nonprofit developers face the same costs as private developers—in land, labor, and materials—yet they have much lower revenues in rents. If they cannot make up the difference with increase funding, they cannot develop affordable housing and stay in business.
- Private sector developers acknowledge that affordable housing is a challenge. Few see it in their best interest to build affordable housing, nor can they profitably develop housing under \$300,000 per unit. They expressed concerns about impact fees increasing and the lengthy time it takes to receiving zoning entitlements.

SP-60 Homelessness Strategy – 91.215(d)

Describe the jurisdiction's strategy for:

- **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**
- **Addressing the emergency and transitional housing needs of homeless persons**
- **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.**
- **Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

Please see the description of homeless programs under MA-30, as well as throughout the Plan, and the description of the Aurora@Home Plan below.

AURORA@HOME PLAN:

Beginning in April of 2010, staff from the City of Aurora, along with homeless provider agencies, County Human Services staff and many other stakeholders, embarked on the development of a new Ten Year Homeless Plan, known as the Aurora@Home Collaborative Plan to Help Families in Need. In 2012, the Aurora@Home Plan was approved and the collaborative partners began work on a pilot program, which was implemented in 2013. Aurora @ Home is a community-based initiative that has developed a long-term, strategic plan that is focused on helping two population groups:

- Displaced families
- Families at-risk for losing their primary place of residence

This initiative is comprised of representatives from the City of Aurora, Adams and Arapahoe Counties, Aurora non-profits and other organizations, and concerned citizens.

The initiative was supported through three different but related efforts:

- Monthly meetings of a community group, consisting of a broad representation of city, county and non-profit entities
- Topic specific focus groups

- Elected official representation from Aurora and Arapahoe, Adams and Douglas Counties.

The Aurora@Home initiative resulted in the creation of a strategic plan that will help families in crisis and be aligned with the recently released Federal Plan, Opening Doors. The Plan also recommended the implementation of a pilot program to initially assist 25 homeless families with housing and supportive services. The pilot program hired a Navigator and is operating with a community-wide intake and assessment process. The families are provided rental assistance and case management/referral to partner agencies for: employment, education, health care, mental health, substance use, child care, transportation, and housing assistance.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Community Development program lead-based paint activities include the following:

- Continuing education for Community Development staff, contractors and their crews to use safe work practices and other protections that reduce the risk of creating lead-based paint hazards during housing rehabilitation;
- Lead Hazard inspections, laboratory evaluations, clearance, testing materials, and all other expenses relating to lead hazard evaluations;
- Lead Hazard Reduction, including, but not limited to paint stabilization, repairing defective surfaces, removing loose paint and applying new paint; interim controls to temporarily control lead-based paint hazards; standard treatments as defined by Title X of the regulation, and; abatement measures to permanently control lead based paint or lead-based paint hazards; and
- Testing for elevated blood levels in children living in lead hazardous homes where rehabilitation activities are taking place under the Single Family Rehabilitation Program, when determined necessary by Community Development Division staff.

According to the Colorado Department of Public Health and Environment (CDPHE) elevated blood levels of 10 or above are considered high and would require additional testing, and levels of 40-45 would require medication. Due to State of Colorado privacy laws, the CDPHE cannot release specific addresses to local jurisdictions.

The City of Aurora Rehabilitation Programs, including Single-Family, Emergency Repair, and Handicapped Accessibility, and the Home Ownership Assistance Program (HOAP) use CDBG and HOME grant funding for lead hazard containment and removal in properties assisted through the programs. These programs provide lead screening in pre-1978 properties and lead removal and/or containment in the properties that tested positive for high levels of lead.

Aurora's Rehabilitation specialists have received training relating to lead-based paint and are aware that lead in paint becomes a hazard when it is released through deterioration on outside walls, through abrasion on windows, floors, and stairs, through impact from the motion of doors, or through disturbance during rehabilitation. The Rehabilitation technicians have also taken part in HUD-sponsored training seminars on lead-based paint and are Colorado State Certified Risk Assessors.

How are the actions listed above related to the extent of lead poisoning and hazards?

The City's single family rehabilitation programs are citywide, but are mailings are targeted to older neighborhood and homes that are more likely to have lead based paint, particularly the Original Aurora area.

How are the actions listed above integrated into housing policies and procedures?

See above and the NRSA strategies.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

While striving to reduce poverty in the community, the City of Aurora, to every extent possible, supports resources and programs that:

1. Strengthen and expand local viable businesses that provide “livable-wage” jobs to Aurora residents;
2. Encourage partnerships with the City of Aurora’s Business Development Center; and
3. Encourage business property owners to participate in the Commercial Renovation Programs in an effort to reduce or eliminate blighting influences and to assist in job creation and/or job retention.
4. Support new viable businesses that will hire local residents as employees and provide “livable-wage” jobs with benefits;
5. Develop job skills of the local workforce so that they can obtain higher-paying employment with benefits and health care;
6. Move families and individuals toward self-sufficiency;
7. Strengthen the delivery and coordination of human and support services, including but not limited to: affordable health care, childcare services, at-risk youth programs, mental health services, and public safety programs;
8. Maintain and develop affordable and stable housing so that poverty-level families and individuals are able to concentrate on making better lives for themselves; and
9. Provide classes for non-Native English speaking persons to learn English and thereby be better able to provide for themselves and their families.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The City of Aurora anticipates continuing its current programs to assist in reducing the number of poverty level families. Those currently consist of a set of programs that “proactively” provide financial opportunities and knowledge for poverty level families to come out of poverty. They include the Pre-Purchase Counseling, Educational Seminars, Homeownership Assistance Loans, and the Tenant-Based Rental Assistance program. Other initiatives are described throughout the Action Plan.

The City also works with many local agencies that work to reduce the number of people living in poverty through the Aurora@Home program. In addition to the programs described above, the City also administers a set of programs to assist families that are in danger of falling into poverty by providing useful information and intermediary services with lenders and creditors. They include Foreclosure Prevention Counseling, Pre-Foreclosure Sale Counseling, Reverse Mortgage Counseling, and Educational Seminars.

SP-80 Monitoring – 91.230

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

The standards and procedures the City has used to monitor program activities will be carried forward.

To ensure long-term compliance with program requirements and comprehensive planning requirements these will include, but are not limited to:

- The Consolidated Annual Performance and Evaluation Report (CAPER);
- The performance review by HUD;
- Receiving a copy of the subrecipients' quarterly results and annual reports;
- Performing ongoing review and monitoring of City operations and files against changing HUD requirements and CPD Notices; and/or
- Performing on-site monitoring of subrecipients.

In accordance with OMB Circular A-128 Section 9.b, the City, in providing funds to a subrecipient, shall ensure that the subrecipient will spend federal funds in accordance with all applicable laws and regulations. This is accomplished by conducting an audit of the subrecipient, as appropriate, and through an executed agreement, which governs the use of the federal funds. In addition, construction activity funded with federal funds is continually supervised and inspected by the City and documented accordingly; and non-construction activity is reviewed through quarterly progress reports and back-up documentation required for each draw down request and documented accordingly.

The City will conduct on-site monitoring of appropriate subrecipients on an annual basis, after determining which subrecipients will require an in-depth review and which will require a limited review. The City will determine which subrecipients will receive on-site monitoring and determine the depth of the review by analyzing program areas by the following criteria:

- Risk factors, including rate of project expenditures;
- Financial stability of subrecipients;
- Recently completed projects;
- Projects that have received complaints or where problems have been identified;
- Projects recommended for monitoring by HUD;
- Projects of a complex nature;

- First time CDBG subrecipients;
- Subrecipients with grants of \$100,000 or more; and
- All economic development activity.

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

At the time this Plan was developed, the City's allocation for the 2020 program year (PY2020) was unknown. The City's Action Plan is based on funding received in the 2019 program year; it assumes that funding for PY2020 year will approximate 2019 levels. If funding amounts are substantially different from PY2019 funding, this plan will be amended.

Anticipated Resources

2020 HUD CDBG Funding:	\$2,852,955
2020 CDBG Program Income/carry forward:	\$200,000
2020 HUD HOME Funding:	\$1,133,568
2020 HOME General Fund Match:	\$255,053
2020 HOME Program Income/carry forward:	\$500,000
<u>2020 HUD ESG Funding:</u>	<u>\$246,431</u>
TOTAL ESTIMATED 2020 FUNDING:	\$5,188,007

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	\$2,852,955	\$200,000		\$3,052,955	\$11,400,000	Expected amount represents four years of funding at \$2.85 million per year
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ESG	Public-federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$246,431			\$246,431	\$1 million	Expected amount represents four years of funding at \$250,000 per year
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Table 44 - 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

HOME Match. HUD requires a local cash match of the HOME allocation of 22.5 percent (total grant less admin). These funds are provided by the City General Fund. In 2019, \$278,733 was the required match and is assumed to be the same for 2020. The resource is not included above in Table 5. The matching funds are used specifically for HOME eligible activities.

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State resources. The City looks forward to several new opportunities to leverage federal and local funds with state resources. During the 2019 legislative session, the state legislature increased the amount of funding that the Colorado Division of Housing (CDOH) will

receive by \$7 million for two fiscal years, and then \$77 million per year for three years. The legislature also approved a bill that required state agencies to inventory underutilized land they own for the potential to repurpose into residential, mixed-income use.

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

The City of Aurora has facilitated acquisition of publicly owned land and property for residential use. The City will continue to evaluate other opportunities to dedicate and repurpose publicly owned land and property for mixed-income development as part of its new housing strategy, in addition to providing incentives to area homebuilders for the creation of middle income ownership housing on new and infill land.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

The anticipated funding by activity and expected outcomes for PY2020 are summarized in the tables below. These funds will be used to accomplish the following goals:

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Support CDBG Activities	2020	2024	Administration		ECONOMIC OPPORTUNITIES HOMELESS HOMEOWNERSHIP INFRASTRUCTURE PUBLIC SERVICES AND FACILITIES RECREATIONAL AND CULTURAL FACILITIES/PROGRAM S RENTAL HOUSING (APARTMENTS, ETC.) SENIORS AND/OR DISABLED SINGLE FAMILY HOUSING REHABILITATION URBAN RENEWAL	CDBG overall: \$570,000	Other: 1

Revitalize and make Public and Commercial Improvements in Designated NRSA	2020	2024	Non-Housing Community Development	ORIGINAL AURORA NEIGHBORHOOD REVITALIZATION STRATEGY	INFRASTRUCTURE URBAN RENEWAL	CDBG: \$675,000 business/façade improvements \$300,000 alley paving/infrastructure \$200,000 pilot fence improvement program	Public facility or infrastructure activities (not Low/Mod area benefit): 3,000 persons assisted Façade treatment/businesses rehabilitation: 2 businesses
Promote Tenant and Homebuyer Knowledge and Awareness	2020	2024	AFFORDABLE HOUSING		HOMEOWNERSHIP RENTAL HOUSING	CDBG: \$275,000	Public services: 700 households assisted

Preserve Existing Affordable Housing and Expand Accessibility in Housing	2020	2024	AFFORDABLE HOUSING	ORIGINAL AURORA NEIGHBORHOOD REVITALIZATION STRATEGY	SINGLE FAMILY HOUSING REHABILITATION	CDBG: \$75,000 Emergency Repairs \$40,000 Tree Removal \$50,000 Accessibility Modifications \$50,000 Radon Mitigation \$400,000 lead hazard mitigation and program delivery (city rehab techs) HOME (loans): \$250,000	Homeowners assisted with CDBG: 75 Emergency Repairs 5 Accessibility Modifications 10 Radon Mitigations Homeowners assisted with HOME: 15
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Prevent Homelessness	2020	2024	HOMELESSNESS		HOMELESS	HOME: \$200,000	Tenant based rental assistance/Rapid Rehousing: 10 households assisted
Support Operations of Organizations Serving Special Needs Residents, including those experiencing Homelessness	2020	2024	HOMELESSNESS		HOMELESS	ESG: \$240,000	Persons assisted in overnight shelter: 2,500 persons
Support HOME Administration	2020	2024	AFFORDABLE HOUSING		AFFORDABLE HOUSING	HOME: \$113,000	Other: 1
Support CHDOs	2020	2024	AFFORDABLE HOUSING		AFFORDABLE RENTAL HOUSING	HOME: \$170,000	

Create and Preserve Affordable Rental and Homeowner Housing	2020	2024	AFFORDABLE HOUSING		AFFORDABLE HOUSING (RENTAL AND OWNERSHIP)	CDBG: \$400,000 HOME: \$600,000	Rental or ownership units constructed: 180 units Rental units rehabilitated: 20 units
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Table 45 – Goals Summary

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2).

The number of households anticipated to be assisted include the following goals for year 1 and years 1-5:

Rental Assistance: 0-30% AMI (TBRA)

- 2020: 10
- 2020-2024: 50

New Construction of multi-family: 0-60% AMI

- 2020: 180
- 2020-2024: 900

Rehabilitation of multi-family: 0-80% AMI

- 2020: 55
- 2020-2024: 275

Rehabilitation of single-family: 0-80% AMI

- 2020: 55
- 2020-2024: 275

Acquisition: 0-80% AMI

- 2020: 20
- 2020-2024: 100

TOTAL

2020: 320

2020-2024: 1,600

Projects

AP-35 Projects – 91.220(d)

Introduction

The specific projects/organizations funded for PY2020 are unknown at this time. Those projects will match the anticipated allocation among activities detailed in AP-20.

Anticipated projects for PY2020 are summarized in the following tables.

1	Project Name	CDBG Administration
	Target Area	N/A
	Goals Supported	Support CDBG Activities
	Needs Addressed	RENTAL HOUSING (APARTMENTS, ETC.) HOMELESS ECONOMIC OPPORTUNITIES PUBLIC SERVICES AND FACILITIES HOMEOWNERSHIP SENIORS AND/OR DISABLED RECREATIONAL AND CULTURAL FACILITIES/PROGRAMS SINGLE FAMILY HOUSING REHABILITATION CODE ENFORCEMENT INFRASTRUCTURE
	Funding	CDBG: \$570,000
	Description	Administration and Planning of CDBG Program. 20% of the annual CDBG allocation plus CDBG Program Income for current allocation year.
	Target Date	N/A
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	Administration and Planning
2	Project Name	Tenant Based Rental Assistance (TBRA)
	Target Area	Citywide
	Goals Supported	Prevent Homelessness
	Needs Addressed	HOMELESS
	Funding	HOME: \$200,000

	Description	The program will assist families with rental assistance making housing more affordable. The amount of assistance will depend on the need of the family and the adjusting rental market. The families are provided rental assistance and case management.
	Target Date	12/31/20
	Estimate the number and type of families that will benefit from the proposed activities	10 families assisted
	Location Description	Citywide
	Planned Activities	See above
3	Project Name	Housing Counseling
	Target Area	Citywide
	Goals Supported	Promote Tenant and Homebuyer Knowledge and Awareness
	Needs Addressed	AFFORDABLE HOUSING
	Funding	CDBG: \$275,000
	Description	The City's Homeownership Assistance Program (HOAP) provides housing counseling for pre-purchase, foreclosure prevention, reverse mortgage counseling, and credit counseling for homeowners, as well as rental counseling, referrals, renter's rights and credit counseling for renters. Additionally, HOAP provides educational seminars for first time homebuyers in English and Spanish.
	Target Date	12/31/20
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 700 households will be served, including all types for rental counseling, pre-purchase counseling, foreclosure prevention counseling, and pre-foreclosure sale counseling. Reverse Mortgage (HECM) counseling will serve senior households.

	Location Description	Available to residents citywide, with a focus on those in the NRSA. Provided by Community Development Division staff at 9898 East Colfax, within the City's designated NRSA
	Planned Activities	See above
4	Project Name	Emergency Repairs
	Target Area	ORIGINAL AURORA NEIGHBORHOOD REVITALIZATION STRATEGY
	Goals Supported	Preserve Existing Affordable Housing and Expand Accessibility in Housing
	Needs Addressed	SINGLE FAMILY HOUSING REHABILITATION
	Funding	CDBG: \$75,000
	Description	The Emergency Home Repair Program provides grants for the emergency repair of owner-occupied single-family homes to address conditions in the home that are hazardous to the occupant's health and safety. The homeowner/applicant must meet low- and moderate income eligibility requirements. Typical projects include, but are not limited to, furnace and water heater replacement, minor electrical and plumbing repairs, and, especially in the older neighborhoods, clay-pipe sewer repairs or replacement. The funds will be in the form of grants not to exceed \$8,000 for sewer line repairs and \$5,000 for all other repairs. Repairs that exceed these amounts may be covered by a deferred payment loan similar to the Single Family Rehabilitation Program.
	Target Date	12/31/20
	Estimate the number and type of families that will benefit from the proposed activities	10 homeowners
	Location Description	Citywide
	Planned Activities	See above
5	Project Name	Accessibility Modification Program
	Target Area	Citywide

	Goals Supported	Preserve Existing Affordable Housing and Expand Accessibility in Housing
	Needs Addressed	SINGLE FAMILY HOUSING REHABILITATION
	Funding	CDBG: \$50,000
	Description	The Handicap Accessibility Grant Program is a program designed to assist owner-occupied, income-eligible households for handicap accessibility modifications to their homes. The funds will be in the form of grants not to exceed \$15,000. Handicap-related rehabilitation can include the installation of wheel chair ramps, chair lifts, widening of doorways (exterior and interior), kitchen repairs, bathroom repairs and any other handicap accessibility needs. Although handicap accessibility issues are addressed under the Single-Family Rehabilitation Program, this program allows modifications specific to accessibility, without the requirement to renovate the entire home.
	Target Date	12/31/20
	Estimate the number and type of families that will benefit from the proposed activities	5 homeowners in households with persons with disabilities
	Location Description	Citywide
	Planned Activities	See above
6	Project Name	Radon Mitigation
	Target Area	Citywide
	Goals Supported	Preserve Existing Affordable Housing and Expand Accessibility in Housing
	Needs Addressed	SINGLE FAMILY HOUSING REHABILITATION
	Funding	CDBG: \$50,000

	Description	The Radon Mitigation Program is designed to assist owner-occupied, income eligible households to address mitigation of high levels of radon gas in the home that are hazardous to the occupants. It is a CDBG funded program and is available throughout the City to eligible homeowners. The program funds will be in the form of a grant not to exceed \$5,000 which will cover initial testing, mitigation, and clearance testing of the project.
	Target Date	12/31/20
	Estimate the number and type of families that will benefit from the proposed activities	13 homeowners
	Location Description	Citywide
	Planned Activities	See above
7	Project Name	Commercial Renovation
	Target Area	ORIGINAL AURORA NEIGHBORHOOD REVITALIZATION STRATEGY
	Goals Supported	Revitalize and make public and commercial improvements in designated NRSA
	Needs Addressed	INFRASTRUCTURE URBAN RENEWAL
	Funding	CDBG: \$675,000

	Description	This program provides funding for commercial revitalization efforts for exterior storefront renovation projects. The on-going exterior storefront renovation program offers design services. The terms of the program require a 50% forgivable loan with a 50% ten-year repayable loan. There is a total CDBG investment cap of \$200,000 for any one project, but more if there are multiple projects for a continuous storefront. The loan portion is secured with a Deed of Trust that includes Deed Restrictions to ensure compliance with on-going maintenance requirements, Overlay District design requirements, and use restrictions for a 5-year period. The program is intended to provide incentives to businesses that expand or relocate to Aurora when such businesses create new jobs and improve the NRSA area. Also addresses Slum/Blight in NRSA.
	Target Date	12/31/20
	Estimate the number and type of families that will benefit from the proposed activities	2 businesses
	Location Description	ORIGINAL AURORA
	Planned Activities	See above
8	Project Name	Rehabilitation Support
	Target Area	ORIGINAL AURORA NEIGHBORHOOD REVITALIZATION STRATEGY
	Goals Supported	Revitalize and make public and commercial improvements in designated NRSA
	Needs Addressed	INFRASTRUCTURE URBAN RENEWAL
	Funding	CDBG: \$400,000
	Description	Administration and project delivery of both residential and commercial rehabilitation programs
	Target Date	12/31/20

	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 63 households of varying types of families will be assisted under the residential programs
	Location Description	NRSA for commercial activities; citywide for others
	Planned Activities	TBD
9	Project Name	Single Family Rehabilitation
	Target Area	Citywide
	Goals Supported	Preserve Existing Affordable Housing and Expand Accessibility in Housing
	Needs Addressed	SINGLE FAMILY HOUSING REHABILITATION
	Funding	HOME: \$250,000
	Description	The Single Family Rehabilitation Program is intended to help maintain the existing affordable housing stock in the community for low- and moderate-income homeowners, and to increase the life expectancy of the home and the quality of life in the community. Currently, the Single Family Rehabilitation Program offers a zero% interest, deferred repayment loan (due upon transfer of title, such as death or sale of the home). In order to qualify for the program, the home must be in need of repairs and applicants must be the owner and occupant of the home and meet income eligibility requirements.
	Target Date	12/31/20
	Estimate the number and type of families that will benefit from the proposed activities	15 households
	Location Description	Citywide
	Planned Activities	See above
10	Project Name	Hazardous Tree Removal Program
	Target Area	Citywide

	Goals Supported	Preserve Existing Affordable Housing and Expand Accessibility in Housing
	Needs Addressed	SINGLE FAMILY HOUSING REHABILITATION
	Funding	CDBG: \$40,000
	Description	Removal of dead non-city trees that have been cited by Code Enforcement or Forestry for removal within the City of Aurora. This is a grant program for owner-occupied homes by low-moderate income homeowners (up to 80% AMI). The program will be administered by the City of Aurora CD Rehab staff.
	Target Date	12/31/20
	Estimate the number and type of families that will benefit from the proposed activities	15 homeowners
	Location Description	Citywide
	Planned Activities	See above
11	Project Name	Neighborhood Infrastructure Projects
	Target Area	ORIGINAL AURORA NEIGHBORHOOD REVITALIZATION STRATEGY
	Goals Supported	Revitalize and make public and commercial improvements in designated NRSA
	Needs Addressed	INFRASTRUCTURE URBAN RENEWAL
	Funding	CDBG: \$300,000
	Description	Typical projects include, but are not limited to: Alley repaving, street and sidewalk improvements, accessibility/ADA improvements
	Target Date	12/31/20

	Estimate the number and type of families that will benefit from the proposed activities	The Original Aurora NRSA has an estimated population of 44,425, of which 80.7% is Low-Moderate Income (LMI). Typically four alleys located in different census tracts/block groups will serve an estimated 2,000 persons
	Location Description	ORIGINAL AURORA NEIGHBORHOOD REVITALIZATION STRATEGY
	Planned Activities	See above
12	Project Name	Pilot Perimeter Fence Program
	Target Area	ORIGINAL AURORA NEIGHBORHOOD REVITALIZATION STRATEGY
	Goals Supported	Revitalize and make public and commercial improvements in designated NRSA
	Needs Addressed	INFRASTRUCTURE URBAN RENEWAL
	Funding	CDBG: \$200,000
	Description	The Perimeter Fence Program will replace and or install fencing along corridors in an effort to eliminate slum and blight within the NRSA
	Target Date	12/31/20
	Estimate the number and type of families that will benefit from the proposed activities	While the program aims to benefit the entire NRSA, approximately 1,000 people will directly benefit in and around the specific area where fencing is installed
	Location Description	ORIGINAL AURORA NEIGHBORHOOD REVITALIZATION STRATEGY
	Planned Activities	See above
13	Project Name	Support HOME Activities
	Target Area	Citywide
	Goals Supported	Support HOME Activities
	Needs Addressed	AFFORDABLE HOUSING
	Funding	HOME: \$113,000

	Description	Administration and Planning of HOME - up to 10% of HOME allocation and Program Income received for the program year.
	Target Date	12/31/20
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	See above
14	Project Name	Community Housing Development Organization (CHDO) Support
	Target Area	Citywide
	Goals Supported	Support CHDOs
	Needs Addressed	AFFORDABLE HOUSING
	Funding	HOME: \$170,000
	Description	A minimum of 15% of the HOME annual allocation will be allocated to a certified Community Housing Development Organizations (CHDO) to be used for new units, acquisition, and/or rehabilitation of affordable housing, such as rental housing and can combine with Supportive Housing for Homeless
	Target Date	12/31/20
	Estimate the number and type of families that will benefit from the proposed activities	TBD; the number of housing units and funding will be dependent on other funding approvals
	Location Description	Citywide
	Planned Activities	See above
15	Project Name	Affordable Housing Creation and Rehabilitation
	Target Area	Citywide
	Goals Supported	Create and Preserve Affordable Rental and Ownership Housing

	Needs Addressed	RENTAL HOUSING (APARTMENTS, ETC.) SINGLE FAMILY HOUSING
	Funding	CDBG: \$400,000 HOME: \$600,000
	Description	Gap funding will be provided to eligible developments for the purpose creating or retaining affordable housing units within the City of Aurora. Approximately 200 units will be developed or preserved
	Target Date	12/31/20
	Estimate the number and type of families that will benefit from the proposed activities	200 families
	Location Description	Citywide
	Planned Activities	See above
16	Project Name	Homelessness Prevention and Support
	Target Area	Citywide
	Goals Supported	Support Operations of Organizations Serving Special Needs Residents, including those Experiencing Homelessness
	Needs Addressed	HOMELESS
	Funding	ESG: \$240,000
	Description	Homeless and supportive services are funded by the Emergency Solutions Grant (ESG) program which allows up to 60% of the total ESG funding for overnight and emergency shelter housing, as well as, supportive services and street outreach. The remaining funds are available for rapid rehousing/homelessness prevention and administration (7.5%). Programs assist homeless individuals and households presumed to be extremely low income (0-30% of AMI).
	Target Date	12/31/20

Estimate the number and type of families that will benefit from the proposed activities	Approximately 2,500 homeless individuals or families will receive overnight shelter. It is estimated that 10 families will receive Rapid Rehousing Assistance
Location Description	Citywide
Planned Activities	12/31/20

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

Allocations were based on past programs, revitalization needs in the City’s designated NRSA, and a growing need to address both affordable rental and homeownership needs.

The primary obstacle to meeting underserved needs is lack of resources. Aurora has many aging properties in which low income owners reside; many of these units require significant rehabilitation to be preserved as affordable homes. Much of the City’s naturally occurring affordable housing stock consists of condominiums and townhomes, some of which are challenging for seniors to navigate as they age. The City has also experienced a significant decline in affordable homes for purchase and rent as prices in the Denver metro area have increased and residents have moved out of more expensive cities into the suburbs. Unlike neighboring communities, Aurora has limited capacity and financial resources—both public and private (i.e., foundation support, exactions)—to dedicate to addressing needs.

AP-50 Geographic Distribution – 91.220(f)

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

The City will seek to continue targeting programs within the Original Aurora area, which is also Aurora's Neighborhood Revitalization Strategy Area (NRSA). The general boundaries of Original Aurora are Yosemite Street on the west, I-225 on the east, East 6th Avenue on the south, and the City border on the north. Non-NRSA specific programs that the City of Aurora directly implements will be made available to all income eligible individuals and households throughout the City.

Geographic Distribution

Target Area	Percentage of Funds
ORIGINAL AURORA NEIGHBORHOOD REVITALIZATION STRATEGY	33

Table 46 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The programs funded and implemented by the Community Development Division, especially the Housing Rehabilitation and Home Ownership Assistance Programs (HOAP), are available to assist income eligible households citywide. Even so, the area of greatest need continues to be Original Aurora. The City will continue to target resources in the Original Aurora neighborhoods, in pursuit of the goals and objectives set forth in the established Neighborhood Revitalization Strategy. Seven out of the City's nine Racially/Ethnicly Concentrated Areas of Poverty (RCAPs) are in this area.

The total amount of funds that will be allocated to the City's NRSA is unknown at this time, as some programs are available to low and moderate households citywide yet may be directed into the NRSA. Those outcomes will be reported in subsequent annual reports. Therefore, at this time it is known that about 33 percent of the estimated \$20,000,000 in CDBG and HOME funding over the next five years will be allocated to the NRSA for specific projects, but an even greater amount flows in through individual loans and rehabilitation projects.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	2,500 persons (through services)
Non-Homeless	210 households
Special-Needs	95 households (emergency repair and accessibility)
Total	305 housing support + 2,500 services

Table 47 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	10 households
The Production of New Units	180 units
Rehab of Existing Units	95 households
Acquisition of Existing Units	20 units
Total	305 households/u nits

Table 48 - One Year Goals for Affordable Housing by Support Type

AP-60 Public Housing – 91.220(h)

Introduction

This section describes anticipated coordination with the Aurora Housing Authority (AHA) in meeting the one-year goals.

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

The City of Aurora works closely with the public housing authority in Aurora. Many multifamily projects developed by the Aurora Housing Authority receive financial support from the HOME program. The City anticipates assisting AHA with opportunities to acquire land and construct and rehabilitate new affordable rental projects.

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

The City of Aurora provides public housing residents with information regarding our Homeownership counseling program, financial fitness classes and our Homeownership assistance program.

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

N/A

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Addressing homelessness continues to be a top priority for the Aurora City Council. The City Council had approved \$1,500,000 annually from Sales Tax Revenue for a three year period, totaling \$4,500,000 from 2016-2018, which was allocated towards homeless needs. In order to continue the efforts, City Council has approved a 2 percent sales tax increase on retail sales, which is projected to be approximately \$2,100,000 annually into the future.

The City and its collaborative partners will continue to be active with Metro Denver Homeless Initiative (MDHI), the HUD designated Continuum of Care (CoC) for the region. The City's Homelessness Program Director is participating as the President of the MDHI Board of Directors and the MDHI Executive Committee.

Aurora Mental Health Center (AUMHC) PATH program will provide housing vouchers for chronically homeless individuals through the OneHome Coordinated Assessment Entry System. An ESG RRH grant award through MDHI and another through the City of Aurora, will assist in rental payments.

In addition to the city's CDBG and ESG funding of the rental assistance program, the city will provide General Funds. Aurora@Home, Aurora Mental Health Center (AUMHC) in partnership with AHA was awarded almost \$366,316 in MDHI's CoC Super NOFA funds to serve 15-20 additional families. The grant funds will be used to cover rental assistance and an additional Navigator. The Aurora Housing Authority (AHA), on behalf of Aurora@Home, will be beginning the second year (2018-2020) of a two part grant award from the Colorado Division of Housing (DOH) for TBRA assistance. This second two part grant (2018-2020) is for a total of \$490,590 and is a partnership between the Aurora Housing Authority, Aurora Mental Health Center, Aurora Public Schools and Cherry Creeks Schools. The Aurora@Home program is steadily growing from 25 families to 50-55 families.

Challenges to finding affordable units continues however, funding from the City's Sales Tax has allowed the Landlord Recruitment Specialist to become a full-time position. This Landlord Recruiter has established relationships with over 22 landlords and property managers and has reduced the time from enrollment to housing placement from 3 months to 8 days on average.

Aurora@Home will continue their close relationship with Arapahoe County Human Services, connecting all families that are eligible to receive TANF. Arapahoe County plans to continue the assignment of a .77 FTE employment specialist from "Arapahoe/Douglas Works!" to work with the program

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

2020 will be the 5th year of operation for the City of Aurora's Homelessness Program to carry out the following activities with the Tax Revenue designated for homeless services:

- Continued funding for homeless services in our city will be close to \$2 million in support annually and additional one-time expenditures as shown below.
- Funding the House Aurora Partnership (HAP) program to prevent evictions and provide move-in funds for those who are experiencing homelessness and who have income but do not have the funds to move-in to their own place.

The Aurora Day Resource Center (ADRC) will continue providing housing and employment-focused outreach to persons experiencing homelessness. There will be opportunities to connect to the entire continuum of regional services, including Coordinated Entry, and other additional services. The ADRC will see between 100-250 people a day and will continue serving as a cold-weather emergency shelter when temperatures drop below 20 degrees at night.

City funding will support AuMHC's PATH program which does street outreach to unsheltered persons. Comititis will continue to be funded with the ESG Emergency Shelter grant. They use additional funding sources to continue providing street outreach to youth in Aurora. The Aurora Community Outreach Team's (ACOT) van will continue to drive around on cold weather nights to encourage unsheltered persons to come in from the cold, or if services are refused, to provide supplies. Aurora Warms the Night will receive city funding for motel vouchers on severe weather nights.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City and the collaborative partners will strategically plan for both short term and long term needs. Comititis will continue to receive ESG funding, and General Funds for 40 beds for single men and women to be open 24/7, year-round. The funding covers the 24/7 staffing plus limited day drop-in services, including personal hygiene, counseling, mental health and substance abuse. Comititis has been operating at or above capacity almost every night since opening their converted beds. On cold weather nights, overflow will be accommodated by the activation of the ADRC as an emergency cold-weather shelter for single men and couples. Aurora Warms the Night (AWTN) will continue to provide motel vouchers for those folks who cannot, for various reasons, stay in a congregate shelters. Motel vouchers will be provided by referral only. The intent of motel vouchers is to shelter those with mental health and physical health issues that present barriers to traditional shelter.

The Aurora Community Outreach Team (ACOT) bus will continue to be deployed on cold nights projected to drop below 20 degrees. They will travel the city offering transportation to shelter, or offer cold-weather kits (blankets, coats, socks, hand warmers and food) to those who refuse shelter. This team will consist of two Aurora Police Officers, a licensed mental health worker, an outreach worker and a licensed medical provider. In addition to transporting to shelter, the team will transport to Emergency rooms, detox facilities or mental health crisis services as

needed. In the past at least one death was prevented by transporting an individual who was experiencing hypothermia.

A primary goal of the City's Homelessness Program is to work with our crisis-response system providers in shifting our model from a "basic needs provision with no outcomes focus", to being a "low barrier, housing-focused system". Comitis in the midst of changing their system to a "housing-focused longer-stay shelter". Aurora Warms the Night, which historically has simply provided cold weather motel vouchers to those who cannot access traditional congregate emergency shelter, has made the shift to being a primary partner in ending homelessness in Aurora, through the "House Aurora Partnership" (HAP).

Gateway Domestic Violence Services continues to receive ESG funding for their shelter in Aurora. The agency provides emergency shelter to victims of domestic violence and counseling services and resources.

East Metro Detox and Recovery will receive ESG funding for their shelter. They will provide overnight stays for chronically homeless persons suffering from substance abuse. This program will provide Detox: shelter beds, nourishment, intensive case management services and vocational services. They will work closely with AWtN and AuMHC's homeless drop-in program.

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

The City and the Aurora@Home collaborative will continue to: plan a pipeline of Permanent Supportive Housing/Affordable Housing projects, continue the Aurora@Home program of rapid rehousing/homelessness prevention, participate with the Coordinated Entry System (OneHome), as well as Aurora@Home's current landlord recruitment strategy, and plan for "bridge housing" until more units come on line.

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

Aurora@Home will continue to provide homelessness prevention assistance to families with case management and housing navigation. Additionally, as described previously, the House Aurora Partnership will provide funds to prevent evictions. The HAP program was started as a response to a crisis which occurred at a sub-standard motel. Families that had lived long-term at this motel, were displaced after the motel sold and the new owners subsequently doubled the rates. The lack of affordable rentals will continue to be a problem in 2019. The Second

Chance Center (SCC) was awarded a PSH 9% tax credit and 49 project based vouchers from the State of Colorado. They have put together financing, located a piece of land, have received approval for zoning variances and City Approval in order to go ahead with their project. They will begin building a 49-unit, Permanent Supportive Housing project for disabled homeless persons and those transitioning out of prison. The PSH program will participate fully in MDHI's OneHome coordinated entry system. Although the Second Chance Center is a reentry organization, they will utilize their experience with providing people with high barriers to mainstream housing for all chronically homeless persons referred to their new program.

AP-70 HOPWA Goals - 91.220 (I)(3)

N/A

AP-75 Barriers to affordable housing – 91.220(j)

Introduction

Aurora completed an Assessment of Fair Housing in 2018 and 2019, as part of a regional effort. That study examined a range of barriers to housing choice, including the negative effects of public policies on development of affordable housing.

The focus groups with stakeholders that were conducted as part of this Plan also helped to inform the barriers analysis.

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

The analysis conducted for the regional AI found that, for barriers overall, Aurora ranked the same as the Denver Metro region in the housing challenges as measured by responses to a housing survey.

The two areas where Aurora residents face the most barriers are in:

- Displacement caused by investors selling rental units. This was much higher than in the region and in any other jurisdiction; and
- Concerns about safety in affordable housing communities and surrounding neighborhoods.

In focus groups, private sector developers expressed challenges with moving development proposals through the zoning and permitting processes and noted that streamlining the development approval process could potentially lower the price of newly constructed starter homes. Private multifamily developers did not express an interest in incentives for providing affordable housing.

Nonprofit and affordable developers said the primary barrier to creating housing for very low income renters is lack of funding. One developer who serves persons with disabilities has eleven different funding sources for one medium-size development project. Because federal funding has been limited for years and is unlikely to increase, it is imperative that funding to support affordable housing be contributed from local, private, and foundation sources to support the renters that the private sector does not serve.

Specific action items that have been developed to address the fair housing barriers identified in the AI study include:

- Add affordable housing to the market. Prioritize housing that accommodates families (larger units).

Action items: Implement policies that produce 100 affordable housing units from HOME funds on an annual basis. Collaborate with housing developers to ensure they have strong affirmative fair housing marketing plans and accommodate families and seniors.

- Continue to fund rehabilitation and accessibility improvements for low income homeowners to preserve existing affordable housing.

Action items: Continue to fund the City's Home Improvement Loan Program that helps low-income homeowners and property owners. Assist no less than 76 units annually with rehabilitation and improvements through the City program and/or minor home repair programs.

- Create a program to "buy down" the cost of Market Rate units created by the private market and which are not affordable to persons at or below 60 percent Area Median Incomes

Action items: In 2019 and 2020, the HOME Tenant Based Rental Assistance program will give low income residents access high economic opportunity environments. Assist approximately 8-10 households annually.

AP-85 Other Actions – 91.220(k)

Introduction

The City will also take other actions to fulfil its goals in this plan.

Actions planned to address obstacles to meeting underserved needs

In addition to all of the housing, homeless/at-risk services, and community development efforts in the Original Aurora NRSA already described, the following activities carried out by the City and its various community partners address underserved needs:

Neighborhood Support Division code officers provide monthly trainings at the City's HOAP seminars on City ordinances related to new property ownership. Code Officers from Team One perform code enforcement and systematic multi-family housing inspections, mobile home inspections, site plan inspections, and zoning inspections within the Original Aurora NRSA. The team provides organizational development assistance in the NRSA. They also secure vacant buildings in order to ensure integrity, diminish opportunities for criminal activity, and to enhance neighborhood safety working alongside with the Aurora Police Department, Aurora Fire Department and the Building Department. Finally, officers conduct code enforcement presentations to NANO meetings, Del Mar Neighborhood meetings, and attended Del Mar Association Neighborhood Watch meetings.

Community Relations Division. Aurora is a majority minority city. Over half of Colorado's refugees live in the North Aurora area. There are over 160 languages spoken in Aurora Public Schools. The Community Relations Division advocates the effective use of available human, community and social service resources, by providing cultural awareness training, translator/interpreter services, information, referrals and resources; and coordinating programs to meet the needs of Aurora's diverse community. They also conduct diversity training and facilitated the following groups:

1. Aurora Community of Faith
2. Aurora Human Relations Commission
3. Aurora Immigrant & Refugee Task Force
4. Aurora Key Community Response Team to assist in times of potential civil disorder
5. Martin Luther King Jr. Commemoration
6. Multicultural Program
7. Veteran's Affairs Commission
8. Hosted Community Race Forum Discussions

Actions planned to foster and maintain affordable housing

Actions are discussed throughout the plan. The City will also research if there are any expiring tax credit or other properties that may revert to market-rate. If any are found, the City will discuss potential options with the owners on keeping these properties affordable.

Actions planned to reduce lead-based paint hazards

Community Development program lead-based paint activities include the following:

- Continuing education for Community Development staff, contractors and their crews to use safe work practices and other protections that reduce the risk of creating lead-based paint hazards during housing rehabilitation;
- Lead Hazard inspections, laboratory evaluations, clearance, testing materials, and all other expenses relating to lead hazard evaluations;
- Lead Hazard Reduction, including, but not limited to paint stabilization, repairing defective surfaces, removing loose paint and applying new paint; interim controls to temporarily control lead-based paint hazards; standard treatments as defined by Title X of the regulation, and; abatement measures to permanently control lead based paint or lead-based paint hazards; and
- Testing for elevated blood levels in children living in lead hazardous homes where rehabilitation activities are taking place under the Single Family Rehabilitation Program, when determined necessary by Community Development Division staff.

According to the Colorado Department of Public Health and Environment (CDPHE) elevated blood levels of 10 or above are considered high and would require additional testing, and levels of 40--45 would require medication. Due to State of Colorado privacy laws, the CDPHE cannot release specific addresses to local jurisdictions.

The City of Aurora Rehabilitation Programs, including Single-Family, Emergency Repair, and Handicapped Accessibility, and the Home Ownership Assistance Program (HOAP) use CDBG and HOME grant funding for lead hazard containment and removal in properties assisted through the programs. These programs provide lead screening in pre-1978 properties and lead removal and/or containment in the properties that tested positive for high levels of lead. Aurora's Rehabilitation specialists have received training relating to lead-based paint and are aware that lead in paint becomes a hazard when it is released through deterioration on outside walls, through abrasion on windows, floors, and stairs, through impact from the motion of doors, or through disturbance during rehabilitation. The Rehabilitation Specialists have also taken part in HUD-sponsored training seminars on lead-based paint and are Colorado State Certified Risk Assessors.

Actions planned to reduce the number of poverty-level families

The City of Aurora anticipates continuing its current programs to assist in reducing the number of poverty level families. Those currently consist of a set of programs that "proactively" provide financial opportunities and knowledge for poverty level families to come out of poverty. They include the Pre-Purchase Counseling, Educational Seminars, Homeownership Assistance Loans,

and the Tenant-Based Rental Assistance program. Other initiatives are described throughout the Action Plan.

The City also works with many local agencies that work to reduce the number of people living in poverty through the Aurora@Home program. In addition to the programs described above, the City also administers a set of programs to assist families that are in danger of falling into poverty by providing useful information and intermediary services with lenders and creditors. They include Foreclosure Prevention Counseling, Pre-Foreclosure Sale Counseling, Reverse Mortgage Counseling, and Educational Seminars.

Actions planned to develop institutional structure

At the time this plan was produced, the Community Development (CD) Division of Aurora's Neighborhood Services Department, the designated Lead Agency responsible for administering programs covered by this new Five-year Plan and associated Action Plans, was in transition with staffing. During the current program year, the department will hire a new director and program staff. These staff will coordinate closely with nonprofit, housing, and supportive service partners to evaluate and overcome gaps in institutional structure and enhance coordination.

During the development of this Consolidated Plan, a focus group with partners identified the following challenges with institutional structure and delivery of services:

- Inadequate safety net for people who are on the edge of poverty and homelessness;
- Lack of resources to address the significant needs of very low income residents;
- Limited participation and interest by the private sector (largely landlords) in addressing needs;
- Overburden that service providers face in "addressing problems that are created by others."

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

The Aurora @ Home Collaborative partners will continue to expand the coordination of housing and services related to rapid rehousing and homelessness prevention. The Governing Board has completed a revised strategic plan for future actions and now includes all homeless and at-risk populations. As previously described, the City's Homelessness Programs Director will coordinate initiatives to address homelessness and those at-risk of homelessness, and coordination of the \$4,500,000 in Marijuana Sales Tax funding.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction: The City receives CDBG, HOME and ESG and follows the specific program requirements as follows:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(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
= \$200,000
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
3. The amount of surplus funds from urban renewal settlements
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
5. The amount of income from float-funded activities

Total Program Income = **\$200,000**

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 = **95.00%**

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows: The City does not administer any other forms of investment that are not described in Section 92.205(b) of the HOME Rule.
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 City of Aurora uses HOME funds to provide down payment and closing cost assistance to first time, income qualified homebuyers. No funds from the 2019 program year will be allocated to the activity however, funds from previous program years may be used to assist homebuyers. The following describes the guidelines:

Loan amounts less than \$15,000 in HOME funds require a five (5) year affordability period that relate to the resale/recapture of the property. The City uses the recapture method for HOAP loans. In accordance with § 92.254 of the HOME rule, the method of recapture of these funds will be through loan repayment by the borrowers of the entire amount of the HOME investment through sale or conveyance of the property that previously received the HOME investment, subject to available Net Proceeds. Net Proceeds is defined as the Sales Price minus the Superior non-HOME debt minus Closing Costs.

See Attachments - 1) HOAP webpage information, and 2) Procedure L for HOME Recapture Provisions for HOAP Loans. Resale restrictions in keeping with § 92.254 of the HOME rule are imposed upon newly constructed for-sale housing. No single family new construction is planned for 2019.

Fair Return on Investment Definition: If a homeowner sells the subject property at any time during the contractually obligated HOME Resale Affordability Period, the City of Aurora, Community Development Division, will establish a standard of fair return as a percentage of the change in median sales prices over the period of ownership based on comparable sales in the vicinity (neighborhood) of the subject property.

The City's policy determines that a fair return to the seller would be their initial out of pocket investment plus the cost of documented eligible upgrades, such as installation of new 90% efficiency furnace, new E-star rated windows and additions to the homes square footage, plus 50% of the remaining net proceeds available after the City recovers the initial down payment and closing cost Annual Action Plan 2019 62 OMB Control No: 2506-0117 (exp. 06/30/2018) subsidy. An example is described later.

The City of Aurora considers that a reasonable range of low-income eligible buyers would in the 0- 80% median income range. In order to ensure affordability for the next buyer of the HOME Resale property, the City of Aurora may provide down payment or second mortgage assistance, first mortgage interest write downs or other mechanisms that enhance affordability, assuming that these programs still exist in their current form at the time of the resale activity.

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: See above. An example on Fair Return is described below:

Original Purchase: \$100,000
Eligible Improvements: \$10,000
Appreciation of Property: \$10,000
New Sale Value: \$120,000
Less 1st Mortgage Pay-off (90,000) Less 2nd Mortgage Pay-off (10,000)
Balance Net Proceeds = \$20,000
Less Eligible Improvements: (10,000)
Remaining Net Proceeds: \$10,000
50% to Seller: (5,000)
50% to the City: (5,000)
Balance: \$0.00

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 City of Aurora does not use HOME funds to refinance existing debt secured by multi-family Annual Action Plan 2019 63 OMB Control No: 2506-0117 (exp. 06/30/2018) housing that is being rehabilitated with HOME funds. Therefore, no refinancing guidelines are required pursuant to § 92.206(b) of the HOME Rule

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment). The City follows the December 5, 2011 HUD Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) rules and standards for providing ESG assistance (and follows all current updates to the rules). In accordance with HEARTH, the City has written the attached Policies and Procedures for the Aurora @ Home "Rapid Rehousing" (RRH) and "Homelessness Prevention" (HP) activities.
2. If the Continuum of Care has established centralized or coordinated assessment system that

meets HUD requirements, describe that centralized or coordinated assessment system. The Metro Denver Homeless Initiative (MDHI) is the Continuum of Care (CoC) that has established a coordinated assessment and housing placement system (CAHPS) and had named this system as "OneHome". The system has begun by utilizing the VI-SPDAT tool for chronically homeless individuals and veterans. (VI-SPDAT is gradually being modified for other homeless populations, such as youth and families with children.) The CoC has also begun community meetings to define ESG RRH written standards to be used for the "OneHome" (CAHPS) system. Once completed, referrals can be streamlined access to ESG subrecipient programs. As of 2018, RRH programs funded with ESG funds began using the OneHome system.

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).

The City of Aurora uses Model 1 for selecting subrecipients: annually the City accepts formal applications from previously funded subrecipients and in every two-three years a formal Request for Application (RFA) process takes place. The formal process involves advertising in the community for new applicants and posting the application on the City's website. Applicants must be able to show capacity to perform ESG activities, have experience in the community and be willing to collaborate with the City's Homeless Plan, "Aurora @ Home".

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 jurisdiction reaches out, consults and attends various Homeless Community Meetings with homeless or formerly homeless individuals which currently take place at the City's Shelter and various non-profit's which directly serve the homeless. The City also encourages all ESG subrecipients to have homeless participation on their boards, furthering ensuring homeless input into the subrecipient level.

5. Describe performance standards for evaluating ESG.

The City has preliminarily adopted HUD's 2014 Objectives for evaluating ESG performance standards. Of the seven HUD Objectives, four are applicable to measuring participants in the Aurora @ Home Rapid Rehousing/Homelessness Prevention program for families with children:

- Increase the percentage of participants remaining in CoC-funded permanent housing projects for at least six months to 80% or more.
- Increase the percentage of participants in all CoC funded projects that are employed at program exit to 20% or more.
- Increase the percentage of participants in all CoC funded projects that obtain mainstream benefits at program exit to 56% or more.
- Increase the percentage of participants in all CoC-funded projects that obtained or increased income from other sources (i.e. cash benefits) at program exit to 54% or more.

The Regional ESG members of MDHI are currently developing objectives and performance standards for the COC. Meetings are underway to discuss written standards to evaluate performance through HMIS.

The Aurora @ Home Program uses the four standards above as a guide for program outcomes. The program continues to serve families with children through rapid rehousing (RRH) and homelessness prevention (HP) for at-risk families.

All these families share one common barrier to remaining stably housed and that is lack of income. The families either lack employment and/or are underemployed (employed part time and/or paid at a rate that does not allow them to be self-sufficient). Other barriers include mental health issues, substance use issues, and lack of child care.

In response to the largest barrier, lack of employment/underemployment noted above, Arapahoe County assigned an employment specialist from Arapahoe/Douglas Works! to work with the program participants half-time. This employment specialist accompanies the navigator on home visits.

SECTION II.

PUBLIC ENGAGEMENT AND NOTICES

PUBLIC NOTICE

The City of Aurora's Draft 2020-2024 Consolidated Plan, including the proposed 2020 Annual Action Plan, will be available for public review and comment for a 30-day period from October 1, 2019 to October 30, 2019.

The Final 2020-2024 Consolidated Plan and 2020 Action Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) by November 15, 2019, or as otherwise advised by HUD.

The 2020-2024 Consolidated Plan is designed to create a link between the identified needs of Aurora's low to moderate-income and special needs populations and the resources of HUD's Community Development Block Grant (CDBG), Home Investment Partnership (HOME) and Emergency Solutions Grant (ESG) funding and other public/private investments. The Five-Year Plan establishes objectives and strategies to address the needs over the next five years in three areas: provide decent housing, provide a suitable living environment, and provide expanded economic opportunities. The 2020 Action Plan is the first year of the 2020-2024 Consolidated Plan and serves as the City of Aurora's formal application to HUD for CDBG, HOME and ESG funding for the fiscal year 2020. The City anticipates that these projects will not cause any displacement of existing households.

The draft 2020-2024 Consolidated Plan and 2020 Action Plan will be presented at a Public Meeting held:

Tuesday, October 8, 2019

6:30 p.m.

Martin Luther King Library Building

Akron/Clinton Rooms

9898 E. Colfax Avenue, Aurora, CO 80010

The public is invited to attend this meeting and citizens will be provided with an opportunity to speak on Housing and Community Development issues and priorities.

The facility is accessible and can accommodate persons with disabilities. Please call the Community Development Division Staff at 303-739-7900 at least 48 hours in advance if you require language translation services or need special accommodations for these Public Meetings, as well as for written documents. For hearing or speech impaired residents, please call 7-1-1 for the Colorado Relay Number.

The 2020-2024 Consolidated Plan and 2020 Action Plan will be available for review at the City of Aurora's Community Development Division on the second floor of 9898 E. Colfax Avenue, Aurora, Colorado, 80010. The facility is accessible and can accommodate persons with disabilities. Please contact Aimee Bart of the Community Development Division Staff at 303-739-7927 or abart@auroragov.org if you require language translation services or need special accommodations, as well as for written documents. For hearing or speech impaired residents, please call 7-1-1 for the Colorado Relay Number. The plan will also be posted on the City's website at: https://www.auroragov.org/residents/community_development/reports_stats_and_documents/

All comments should be submitted in writing by October 30, 2019 to Michael Lawson, City of Aurora, Community Development Division, 9898 E. Colfax Avenue, Aurora, Colorado, 80010; or

mlawson@auroragov.org. For questions and additional information please contact Michael Lawson at the above address or 303-739-7900.

The Citizen's Advisory Committee on Housing and Community Development (CHD) for the City of Aurora held its Public Hearings on the proposals for the 2020 Action Plan on July 9, 2019 and subsequent decision-making meeting on July 16, 2019. The CHD presented its final funding recommendations to the Aurora City Council at a meeting open to the public on September 10, 2019. The CHD recommended the following estimated funding amounts for the 2020 Action Plan to the Aurora City Council:

2020 HUD CDBG Funding:	\$2,852,955
2020 CDBG Program Income/carry forward:	\$200,000
2020 HUD HOME Funding:	\$1,133,568
2020 HOME General Fund Match:	\$255,053
2020 HOME Program Income/carry forward:	\$500,000
<u>2020 HUD ESG Funding:</u>	<u>\$246,431</u>
TOTAL ESTIMATED 2020 FUNDING:	\$5,188,007

Publication: September 19, 2019, September 26, 2019, October 3, 2019
Aurora Sentinel

AVISO PÚBLICO

El Plan Consolidado Preliminar 2020-2024 de la Ciudad de Aurora, incluido el Plan de Acción Preliminar 2020 estarán disponibles para su revisión y comentarios públicos durante un período de 30 días a partir de el 1 de Octubre a la vez de el 30 de Octubre, 2019.

El Plan Consolidado Final 2020-2024 y el plan de Acción 2020 se presentarán al Departamento de Vivienda y Desarrollo Urbano (HUD) de los Estados Unidos el 15 de Noviembre de 2019 o según lo aconsejado por HUD.

El Plan Consolidado 2020-2024 está diseñado para crear un enlace entre las necesidades identificadas de la población de Aurora de ingresos bajos a moderados y poblaciones con necesidades especiales y los recursos de la Comunidad para el Desarrollo de HUD (CDBG), Home Investment Partnership (HOME) y fondos de Emergency Solutions Grant (ESG) y otras inversiones públicas / privadas. El plan quinquenal establece objetivos y estrategias para hacer frente a las necesidades en los próximos cinco años, en tres áreas: proporcionar una vivienda digna, proporcionar un ambiente de vivienda adecuado, y proporcionar mayores oportunidades económicas. El Plan de Acción 2020 es el primero año del Plan Consolidado 2020-2024 y sirve como la solicitud formal de la Ciudad de Aurora propuestas de financiación a HUD para CDBG, HOME y ESG para el 2020. La ciudad anticipa que estos proyectos no causarán el desplazamiento de los hogares existentes.

El Plan Consolidado Preliminar 2020-2024 y el Plan de Acción 2020 se presentarán en una reunión pública

Martes, Octubre 8, 2019

6:00 p.m.

Edificio Martin Luther King Library

Habitaciones Akron / Clinton

9898 E. Colfax Avenue, Aurora, CO 80010

El público está invitado a asistir a estas reuniones y los ciudadanos se le proporcionará la oportunidad de hablar sobre los problemas y prioridades de Vivienda y Desarrollo Comunitario.

El Consolidado 2020-2024 y el Plan de Acción 2020 estarán disponibles para su revisión en la Ciudad en la División de Desarrollo de la Comunidad de Aurora en el segundo piso de 9898 E. Colfax Avenue, Aurora, Colorado, 80010, y en el vestíbulo del Centro Martin Luther King, Jr. Biblioteca (MLK) en el primer piso de la misma dirección de instalación. La instalación es accesible y puede acomodar a las personas con discapacidad. Por favor, póngase en contacto con Aimee Bart del personal de la División de Desarrollo de la Comunidad al 303-739-7927 o abart@auroragov.org si necesita servicios de traducción o necesita adaptaciones especiales, así como para los documentos escritos. Para residentes con discapacidad de escuchar o residentes con problemas para hablar, por favor llame al 7-1-1 para obtener el Número de Relé de Colorado. El plan también se publicará en la página web de la Ciudad en: https://www.auroragov.org/residents/community_development/reports_stats_and_documents/.

Todos sus comentarios deben ser presentados por escrito el 30 de Noviembre del 2019 y a Michael Lawson, Ciudad de Aurora, División de Desarrollo Comunitario, 9898 E. Colfax Avenue, Aurora, Colorado, 80010; o mlawson@auroragov.org. Para cualquier duda o información

adicional, por favor póngase en contacto con Michael Lawson en la dirección arriba o llame al 303-739-7900.

El Comité de Asesoramiento del Ciudadano de Vivienda y Desarrollo Comunitario (CHD) para la ciudad de Aurora celebró su audiencias pública sobre las propuestas para el Plan de Acción 2020 el 9 de Julio 2019 y el encuentro subsecuente para hacer decisiones el 16 de Julio 2019. La CHD presentó su última recomendaciones de financiación al Consejo de la Ciudad de Aurora en una reunión abierta al público el 10 de Septiembre de 2019. La CHD recomendó las siguientes cantidades de financiación estimadas para el Plan de Acción 2020 para el Consejo de la Ciudad de Aurora:

2020 HUD CDBG Funding / Financiación:	\$2,852,955
2020 CDBG Program Income / Ingreso de Programa:	\$200,000
2020 HUD Home Funding / Financiación de Viviendas:	\$1,133,568
2020 HOME General Fund Match / Partido de Fondos Generales:	\$255,053
2020 HOME Program Income / Ingreso de Programa:	\$500,000
<u>2020 HUD ESG Funding / Financiación:</u>	<u>\$246,431</u>
FINANCAMIENTO TOTAL ESTIMADO PARA EL 2020:	\$5,188,007

Publicación: el 19 de Septiembre, 2019, 26 de Septiembre, 2019, 3 de Octubre, 2018
Aurora Sentinel

NOTICE OF PUBLIC HEARINGS

The City of Aurora's Citizen's Advisory Committee on Housing and Community Development (CHD) will hold Public Meetings on **Tuesday, July 9, 2019** and **Tuesday, July 16, 2019 at 6:00 p.m.** to discuss Housing and Community Development priorities and funding proposals for the 2020 Community Development Block Grant (CDBG), Home Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG) Programs.

The first Public Meeting to hear proposals will be held:

Tuesday, July 9, 2019

6:00 p.m.

Martin Luther King Library Building

Akron/Clinton Rooms

9898 E. Colfax Avenue, Aurora, CO 80010

The second Public Meeting to review proposals and provide funding recommendations will be held:

Tuesday, July 16, 2019

6:00 p.m.

Martin Luther King Library Building

Akron/Clinton Rooms

9898 E. Colfax Avenue, Aurora, CO 80010

The public is invited to attend these meetings and citizens will be provided with an opportunity to speak on Housing and Community Development issues and priorities.

The facility is accessible and can accommodate persons with disabilities. Please call the Community Development Division Staff at 303-739-7900 at least 48 hours in advance if you require language translation services or need special accommodations for these Public Meetings, as well as for written documents. For hearing or speech impaired residents, please call 7-1-1 for the Colorado Relay Number.

For more information on the Community Development Division and the CDBG, HOME, and ESG programs, please visit the City's website at:

https://www.auroragov.org/residents/community_development/

Publication: June 20, 2019, June 27, 2019 and July 4, 2019

Aurora Sentinel

SECTION III.

POLICIES



**City of Aurora
Community Development Division
9898 E. Colfax Ave.
Aurora, CO 80010
Phone: 303-739-7900
Fax: 303-739-7925**

**HOME Investment Partnership Program
Subrecipient, Owner, Developer and Sponsor
Policies and Procedures Manual**



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CHAPTER 1

Introduction.

The City of Aurora's Community Development Division provides this manual as a resource for implementing its HOME-program Subrecipient (Subrecipient, Developer, Owner or Sponsor) projects and for other interested parties including nonprofit and for-profit organizations who are contemplating applying for funding assistance under the Community Development HOME Subrecipient Program.

The HOME Program was created by the National Affordable Housing Act of 1990 (NAHA), the statute for the program, and has been amended several times by subsequent legislation.

The City of Aurora has been a participant in the HOME Investment Partnership Program since its inception in 1992. Through this program, activities have been undertaken to enhance on-going neighborhood revitalization efforts, particularly in Original Aurora.

Annually, the City of Aurora allocates HOME program funding toward established core housing activities, including Single Family Owner-occupied Rehabilitation, First-time Homebuyer, Community Housing Development Organizations, and Tenant-based Rental Assistance (Rent and Utility Deposit only). These activities will continue to receive the highest priority for annual HOME funding. Each of the programs listed above have established program policies and procedures, which will not be included in this manual.

CHAPTER 2

Purpose.

The primary purpose of this manual is two-fold:

- To serve as the City of Aurora's Community Development administrative policy and procedure (P&P) manual for its HOME program specifically for Subrecipient type (Subrecipient, Developer, Owner or Sponsor) programs and/or projects;
- To serve as a quick reference for the new HOME Final Rule dated July 24, 2013 with emphasis on HOME program changes.

This manual is not meant to be a substitute for *HOME Regulations*, but as a supplement to them. It is not exhaustive regarding all considerations affecting the use of HOME funds. Community Development Division reserves the right to add, remove or change policies, procedures or forms in this manual. Notwithstanding any information contained herein, where a conflict of language or omission of requirements occurs, the requirements of the Federal Notice and HUD Guidance on the HOME Program, as may be amended, shall prevail.

Additionally, due to funding limitations, not all HOME eligible activities are represented herein. Primary focus is placed on HOME required regulatory changes that must be included in the PJ's P&Ps and the city's active programs. HOME funded programs such as the Home Ownership Assistance Program (HOAP) and the Single Family Rehabilitation Program have P&P manuals specifically for those programs. However, in looking forward for the purpose of addressing priority targets identified in the 2015-2019 Consolidated Plan, Affordable Housing, guidelines and implementation detail of 24 CFR 92.2; 92.250, 92.251, 92.252, 92.254 are added for compliance under the 2013 New HOME Final Rule.

Lastly, this manual lays the foundation to address housing concerns and disparities put forth in the 2015 -2019 Consolidated Plan. Note that for the 2018 – 2019 planning years, program activities and guidelines will be added and modified as we start the process of the Community Development Division taking lead in planning community development activities with the goal of eliminating the City's impediments to fair housing.

CHAPTER 3

History and Goals of the Program.

The HOME Program was created by the National Affordable Housing Act of 1990 (NAHA), the statute for the program, and has been amended several times by subsequent legislation.

The United States Department of Housing and Urban Development (HUD) administers the HOME Program. The HOME Program Final Rule found at 24 CFR Part 92 is the implementing regulations for the program. The HOME Final Rule has been updated over the years. The most recent update was published in the ***Federal Register*** on July 24, 2013. All relevant HOME laws, regulations, notices, and other guidance can be found at: <https://hudexchange.info/home>.

In general, under the HOME Investment Partnership Program, HUD allocates funds by formula among eligible State and local governments to strengthen public-private partnerships and to expand the supply of decent, safe, sanitary, and affordable housing, with primary attention to rental housing, for very low-income and low-income families. Generally, HOME funds must be matched by non-federal resources. The City of Aurora provides the required matching funds from the City's general fund.

State and local governments that become participating jurisdictions (PJs) may use HOME funds to carry out multi-year housing strategies through acquisition, rehabilitation, and new construction of housing, and tenant-based rental assistance. Participating jurisdictions may provide assistance in a number of eligible forms, including loans, advances, equity investments, interest subsidies and other forms of investment that HUD approves.

Purpose of the Regulatory Action. The HOME program is the largest federal block grant program for affordable housing for low-income households. The program provides formula grants for four primary purposes:

As eligible activities:

- ❖ Housing rehabilitation,
- ❖ Homebuyer activities,
- ❖ Rental housing activities,
- ❖ Tenant-based Rental Assistance (TBRA)

Individual households, nonprofit and for-profit developers may apply for HOME funding.

Objectives.

The intent of the HOME Program is to:

- Provide decent affordable housing to lower-income households,
- Expand the capacity of nonprofit housing providers,
- Strengthen the ability of state and local governments to provide housing; and
- Leverage private-sector participation.

HOME is the largest federal block grant to state and local governments designed exclusively to maintain and create affordable housing for low-income households.

The program was designed to reinforce several important values and principles of community development:

- HOME's flexibility empowers people and communities to design and implement strategies tailored to their own needs and priorities.
- HOME's emphasis on consolidated planning expands and strengthens partnerships among all levels of government and the private sector in the development of affordable housing.
- HOME's technical assistance activities and set-aside for qualified community-based nonprofit housing groups builds the capacity of these partners.
- HOME's requirement that PJ's must reserve a minimum of 15 percent (15%) of its annual allocation for housing that is owned, developed, or sponsored by qualified Community Housing Development Organizations (CHDO).
- HOME requires that each PJ incurs a 25 percent (25%) matching obligation for HOME funds it expends. Matching contributions must be a permanent contribution to affordable housing from non-federal sources; and Provided by any of a broad array of public and private donors, such as local government agencies, state agencies, charitable organizations/foundations, and private sector organizations such as lending institutions and corporate donors¹

¹ The City of Aurora provides 25% match requirement through government agency general funds

CHAPTER 4

HUD issues a number of changes to the HOME Program with the publication of the 2013 HOME Final Rule on July 24, 2013. These changes are applicable to all HOME-funded projects to which HOME funds are committed on or after August 23, 2013, with the exception of a number of provisions that HUD is phasing in, to allow PJs time for implementation. A summary of the key changes in the 2013 HOME Final Rule, see <https://www.hudexchange.info/home/home-final-rule/highlights-of-the-changes-in-thehome-final-rule>

Overview of Key Changes Made to HOME Program Regulations.

The final rule largely adopts the provisions in the proposed rule, but HUD did make certain changes to the proposed regulatory provisions in response to public comments and further consideration of issues. Additionally, HUD further clarified language in various regulatory provisions for which commenters continued to indicated misunderstanding about the intent or meaning of the provision. The key substantive changes in the regulation are intended to:

- Accelerate the timely production and occupancy of assisted housing,
- Strengthen the performance of PJs and their partners in producing and preserving affordable housing units,
- Provide PJs with greater flexibility in the design and implementation of their programs, and
- Increase administrative transparency and accountability.

The 2013 HOME Rule revised a number of commitment and completion deadlines and imposed new occupancy deadlines:

- HOME projects must be completed within four years of commitment. Any project that is not completed timely will be terminated and PJs will be required to repay HOME funds drawn. [§92.205(e)(2)]
- HOME-assisted rental units must be occupied by income-eligible households within 18 months of project completion, or the PJ must either convert it to a HOME rental unit or repay the full HOME investment. [§92.252]
- A Homebuyer unit must have a ratified sales contract within nine months of construction, or the PJ must either convert it to HOME rental unit or repay the full HOME investment. [§92.254(a)(3)]
- CHDO set-aside funds must be committed to *specific projects* within 24 months of the PJ receiving its HOME allocation. The PJ can no longer **“reserve”** CHDO funds for projects that will be identified at a later date. [§92.2 Commitment, §92.300(a)(1)]

- CHDO set-aside funds must be expended within 5 years of when the PJ receives its formula allocation. [§92.500(d)(1)(A) and (C), and §92.500(d)(2)]

The 2013 Rule provided regulatory guidance to strengthen PJs' performance in the production and preservation of HOME-assisted projects. The changes relate to underwriting, property standards and construction oversight, CHDO qualification and capacity, and long-term viability of projects.

Underwriting and Program Design.

- PJs must underwrite all HOME projects to ensure that each project is financially sustainable over its affordability period. The underwriting review evaluates costs reasonableness, market demand, developer capacity, and the commitment of other funding sources (subsidy layering). [§92.250(b)]
- PJs must adopt program policies for homebuyer programs (see HOAP established policies and procedures manual). [§92.254(f)]
- Homebuyers must receive housing counseling (see HOAP established policies and procedures manual). [§92.254(a)(3)]

Property Standards and Construction Oversight.

- Property standards are updated to reference current national codes and to require that PJs establish standards that will sustain quality assisted housing for at least the affordability period. Within the 2013 Rule, property standards requirements are reorganized by project type – new construction, rehabilitation, acquisition without rehabilitation, and manufactured housing. [§92.251]
 - ❖ New Construction [§92.251(a)]
 - ❖ Rehabilitation [§92.251(b)]
 - ❖ Acquisition of standard housing [§92.251(c)]
 - ❖ Housing occupied by tenants receiving HOME TBRA [§92.251(d)]
 - ❖ Manufactured housing [§92.251(e)]
 - ❖ Ongoing property standards for rental projects [§92.251(f)]
 - ❖ Inspection procedures [§92.251(g)]
- PJs must identify and plan for major systems repairs. For rental rehabilitation projects with 26+ units, this must be done via a capital needs assessment. The PJ must require that the scope of rehabilitation work and replacement reserves deposits must be sufficient to ensure the useful life of essential building components throughout the period of affordability. For homeownership housing/rehabilitation, major systems must have a useful life of at least five years upon project completion (see HOAP and SFR established policies and procedures manual) [§92.251(b)(ii) and (viii)]

- PJs must develop inspection policies and procedures, including initial inspections of properties to be rehabilitation or acquired to determine the necessary scope of work to bring each property up to applicable standards; and progress and final inspections for all new construction and rehabilitation projects to ensure projects are constructed according to approved plans. [§92.2519g]

CHDO Qualification & Capacity Requirements (See HOME CHDO Policies & Procedures).

- To qualify as a CHDO, a nonprofit must have paid staff whose experience qualifies them to undertake CHDO set-aside activities. Capacity cannot be demonstrated by use of a consultant, except in the first year that a CHDO becomes certified. [§92.2 Community housing development organization]
- Each time the PJ commits HOME funds, it must **re-certify** a nonprofit's qualifications to be a CHDO and its capacity to own, sponsor, or develop housing. [§92.300(a)]
- The roles of owner, developer, and sponsor for CHDOs using set-aside funds are more specifically defined. Among other changes, the 2013 Rule permits a PJ to provide CHDO set-aside funds for a CHDO that owns rental housing that it does not develop. [§92.300(a)(2)]

Long-Term Viability of Rental Projects.

- During the affordability period, PJs must examine the financial condition of projects with 10+ HOME-assisted units at least annually, and must take action where feasible to correct problems that threaten a project's financial viability. [§92.504(d)(2)]

Provide Flexibility in Program Design and Administration.

- PJs may utilize a risk-based monitoring system and adjust the schedule of ongoing rental unit inspections as part of a risk-based monitoring system, but inspections must occur no less frequently than every 3 years. The first on-site inspection must occur within 12 months of project completion. [§92.504(d)]
- PJs are permitted to charge certain fees: reasonable application fees, homebuyer counseling fee, and ongoing rental monitoring fees. The cost of inspections and income determinations for TBRA recipients may be charged as project soft costs. (The City of Aurora chooses not to charge these type of fees) [§92.214(b)(1) and §92.209(a)]

Increase Administrative Transparency and Accountability.

- PJs must develop risk-based monitoring systems for all HOME funded activities and projects, including on-site monitoring schedules and financial oversight protocols for rental properties. [§92.504(a) and §92.504(d)(2)]

2013 HOME Final Rule Effective Dates.

In general, requirements apply to projects to which HOME funds are committed on/after August 23, 2013.

Requirements w/Delayed Implementation	Effective Date
Project-specific CHDO reservations (§92.2, definition of commitment)	October 22, 2013, (90 days after publication date) HUD will implement on or after January 1, 2015
Homebuyer procedures (§92.254(f))	January 24, 2014 (6 months after publication date)
Written policies, procedures, and systems (§92.504(a))	July 24, 2014 (12 months after publication date)
Financial oversight (§92.504(d)(2))	July 24, 2014 (12 months after publication date)
5-year CHDO expenditure deadline (§92.500(d)(1)(C))	HUD will implement for all deadlines on or after January 1, 2015
Property Standards (§92.251)	January 24, 2015 (18 months after publication date)

CHAPTER 5

Proposed Funding and Project Selection.

The City of Aurora Community Development Division distributes HOME funds geographically within Aurora city limits. Funding amounts differ according to the priorities of housing needs as identified in its approved Consolidated Plan and current year Action Plan. Current priorities are 1) families with children, 2) veterans/seniors, and 3) homeless or at risk of homelessness. The City of Aurora Community Development Division only invests HOME funds in eligible projects within its city limit boundaries.

Subrecipient applications for City of Aurora HOME funds are available on a year round basis, subject to funding availability. The City of Aurora Community Development Division only accepts applications that meet eligible HOME funded activities. The City of Aurora Community Development Division follows two models when selecting subrecipients:

- Model “3” Direct Solicitation – In this approach, the City of Aurora identifies a pool of qualified organizations. This is done informally, through discussion with knowledgeable community sources or through the internal information that the Community Development Division has acquired over the years.
- Model “4” Unsolicited Applications – In this approach, prospective sponsors of community development activities (both public and private) contact the city directly to request funding for a specific project (such as 4% Federal Tax Credits/State Tax Credit and 9% Low Income Housing Tax Credits (LIHTC)). The activities involved may or may not conform to existing funding plans, and it is the responsibility of the Community Development Division to determine the merit and feasibility of the project/application.

A determination will include an assessment of whether the proposed project is consistent with the Consolidated Plan/Action Plan and must meet “Eligible HOME Program Activities” as identified under the 2013 HOME Final Rule.

City of Aurora Community Development Division staff will meet with the possible developer, owner or sponsor regarding the proposed project. If this preliminary interview/review determines that the proposed project has merit, an application for HOME funds will be sent electronically to the developer, owner, or sponsor.

2013 HOME Rule Requirements – The same project assessment requirements – underwriting the project, assessing the developer’s capacity and fiscal soundness, and assessing the current market demand for the project – are all included as provision in the 2013 HOME Rule, at §92.250(b).

The City of Aurora Community Development Division will continue to ensure that these requirements have been met before executing the written agreement committing HOME funds to the project. As the PJ, Community Development Division staff will continue to certify compliance with these requirements in accordance to the 2013 HOME Final Rule.

CHAPTER 6

Overview.

The City of Aurora receives funds from the U.S. Department of Housing and Urban Development (HUD) as a Participating Jurisdiction (PJ) and the Community Development Division is the city department responsible for the management and the administration of Community Planning Development grants from HUD including the HOME program. The Community Development Division facilitates an annual application process for projects and programs under the CDBG, ESG, and HOME Program.

The Community Development Division distributes HOME funds for different categories of housing needs, according to the priorities of housing needs identified in its approved Consolidated Plan. The City of Aurora only invests HOME funds in eligible projects within the Aurora city limits.

All applications are reviewed through established policies and procedures to ensure consistency and fairness. For the 2018-2019 program, and subject to funding availability, HOME funding applications are available on an “open-round” basis.

Before committing funds to a project, the applications are evaluated for program compliance, and particularly compliance under §92.2 and §92.250. The projects undergo risk assessments and final underwriting and subsidy layering to ensure program compliance and that the PJ will not invest any more HOME funds into a project than is necessary to provide affordable housing.

For the purpose of this policy and procedures manual, the City of Aurora (*as a Participating Jurisdiction – PJ*) may choose from a broad range of eligible activities, using HOME funds to provide home purchase/rehabilitation for homebuyers, Housing Stabilization Program (HSP) or rehabilitation financing for housing for rent; or for “other reasonable and necessary expenses related to the development of non-luxury housing,” including site acquisition or improvement, demolition of dilapidated housing to make way for HOME-assisted development, and payment of relocation expenses.

HOME-assisted rental housing must comply with certain rent restrictions. HOME rent limits are published each year by HUD.

The program also complies to established maximum per subsidy limits and maximum purchase-price limits as published by HUD.

Under these established policies and procedures, the City of Aurora invests HOME funds in the following housing activities:

- Homebuyer Activities: Finance the acquisition and rehabilitation of homes for homebuyers and homeownership (HSP Program has a separate P&P manual);
- Rental Housing: Affordable/workforce housing may be acquired and/or rehabilitated, or may be new construction;
- Tenant Based Rental Assistance (TBRA);

- Community Housing Development Organizations (CHDO);
- Suprecipients – Developers, Owners and Sponsors – nonprofit and for-profit entities participating in the HOME Program as owners, developers and/or sponsors of housing.

All HOME funds must be used to benefit families and individuals that qualify as low-income at or below 80 percent (80%) of area median income (AMI). The HOME program provides the City of Aurora Community Development Division with the discretion to determine the type of housing product in which they will invest, the location of these investments, and the segment of their population that will be housed through these investments.

Minimum & Maximum Subsidy Limit, Underwriting, and Subsidy Layering. [§92.250]

Region VIII 2018 Maximum HOME Investment Subsidy*.

State	Multiplier	Max. Subsidy 0 bdr	Max. Subsidy 1 bdr	Max. Subsidy 2 bdr	Max. Subsidy 3 bdr	Max. Subsidy 4 bdr
Colorado	2.40	\$147,074	\$168,600	\$204,581	\$265,229	\$291,137
Montana	2.40	\$147,074	\$168,600	\$204,581	\$265,229	\$291,137
N. Dakota	2.40	\$147,074	\$168,600	\$204,581	\$265,229	\$291,137
S. Dakota	2.40	\$147,074	\$168,600	\$204,581	\$265,229	\$291,137
Utah	2.40	\$147,074	\$168,600	\$204,581	\$265,229	\$291,137
Wyoming	2.40	\$147,074	\$168,600	\$204,581	\$265,229	\$291,137

*Subject to change without notice

HOME Homeownership Sales Price Limits – FY 2018 (effective 2/4/2019)**

Existing Homes	New Construction
\$342,160	\$491,150

**Subject to change without notice

- A minimum of \$1,000 must be spent on an average per unit, except TBRA.
- The maximum per-unit subsidy invested in a HOME project must not exceed the maximum per-unit limits published and updated annually by HUD (see above).
- Before committing funds to a project, the PJ must evaluate the project in accordance with subsidy layering and underwriting guidelines to determine that no more assistance is provided than is needed, and that the level of profit or return on owner’s or developer’s investment in a project is reasonable. Details of Underwriting and Subsidy Layering can be found on page 22 under Procedure 4.
- The PJ must not invest any more HOME funds, alone or in combination with other governmental or private assistance, than is necessary to provide quality affordable housing that is financially viable for the HOME period of affordability. [§92.250]

Long Term Affordability.

The HOME Program imposes affordability requirements that must be met well beyond the initial investment of HOME funds. For rental properties, the HOME rules require ongoing monitoring of rents, tenant incomes, and property standards throughout the period of affordability.

The City of Aurora Community Development Division shall ensure that HOME-funded housing units remain affordable in the long term as follows:

- ✚ 30 or 40-years for New Construction (the affordability period will follow the period required by CHFA).
- ✚ 15-years for construction of homeownership housing and housing rehabilitation depending on the amount of the HOME subsidy.

To ensure investments provide affordable housing over the long term, rent and occupancy restrictions continue throughout the period of affordability.

The minimum length of an affordability period depends on the amount of the HOME investment in the property and the nature of the activity:

HOME Funding Amount	Minimum Period of Affordability in Years
Under \$15,000	5 years
\$15,000 to \$40,000	10 years
Over \$40,000	15 years
New Construction	20 years

HOME Funds – Commitment, Expenditure, and Completion Requirements. [§92.500]

- Participating Jurisdictions (PJs) have two years (2) to commit set-aside for CHDOs from date of Grant Agreement with HUD;
- Participating Jurisdictions (PJs) have eight years (8) to spend (draw down) HOME funds;
- Participating Jurisdictions (PJs) have four (4) years to complete a project activity from date of written agreement.

Monitoring, Recordkeeping, Reporting. [§92.504, 92.508, and 92.509]

- PJs must have and follow written policies, procedures, and systems for administering their HOME funds and programs.
- PJs must have a system for assessing risk of activities and projects and a system for monitoring entities consistent with this assessment system, to ensure that the HOME requirements are met.
- PJs must keep records that enable HUD to determine whether they have met program and project requirements.
- PJs must submit a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD.

CHAPTER 7

Procedure 1: HOME Application Process

Applicant (Developer, Owner or Sponsor) contacts the Community Development Division regarding possible partnership with the City of Aurora on an affordable/workforce housing project.

Community Development Division staff will schedule a date and time to meet one-on-one or have a conference call interview with the applicant. The interview will cover the following subject matter:

- ❖ Type of Project (acquisition, acquisition/rehabilitation, new construction, rehabilitation only)
- ❖ Certified CHDO, if applicable
- ❖ Location of the project within the city
- ❖ Does the developer own the land, if so was the land acquired following URA requirements
- ❖ Size (# of units, unit description (1,2,3,4 bedrooms))
- ❖ Population to serve (families, seniors, veterans, singles)
- ❖ LIHTC project (4% non-competitive, 4% Federal Credit & STC, 9% LIHTC). When was the project awarded tax credits
- ❖ Is the project consistent with the current 5-year Consolidated Plan
- ❖ Explain what HOME funds can be used for
 - Acquisition Costs if land is purchased in accordance with HOME regulations
 - Development Hard Costs
 - Related Soft Costs
 - Relocation Costs, if applicable
 - Requirement for a minimum of two community meetings for new construction projects
 - Independent Capital Needs Assessment for rehabilitation projects
 - Current Market Study (update will be required if market study is over 12 months old)
 - Financial Statements
 - Requirement for DUNs number and Registration/active status in SAMS

Acquisition Costs: Acquisition of Vacant land or demolition are not eligible stand-alone activities and no HOME program funds shall be expended for these activities alone, but only in conjunction with an affordable housing development activity. No funds shall be committed until Community Development Division has determined that construction will begin within 12 months. §92.205(a)(2)

Acquisition Costs may include but not be limited to:

- Costs of acquiring improved or unimproved real property;

- ❑ Acquisition of vacant land or demolition can only be undertaken for particular housing projects intended to provide affordable housing;

Development Hard Costs: may include but not be limited to:

- ❑ Actual cost of constructing or rehabilitating housing (**New Construction projects** must meet City of Aurora Construction/Zoning/Design standards, including but not limited to noise, energy star efficiency, etc; **Rehabilitation projects** must meet City of Aurora Construction/Zoning/Design standards.
- ❑ Demolition of existing structures
- ❑ Uniform Relocation Costs
- ❑ Creation of utility connections
- ❑ Improvements to the project site (only property owned by the project owner, where the project is located) that are in keeping with improvements of surrounding, standard projects. Including:
 - ❖ On-site roads
 - ❖ Sewer lines
 - ❖ Water lines

Soft Costs: Include other reasonable and necessary costs incurred by the owner and associated with the financing, or development (or both) of new construction, rehabilitation or acquisition of housing assisted with HOME funds. These costs include, but are not limited to:

- ❖ Architectural Services
- ❖ Engineering Services
- ❖ Preparation of plans, drawing, specification, or work write-ups
- ❖ Costs to process and settle the financing for a projects
- ❖ Private lender origination fees
- ❖ Credit Reports
- ❖ Fees for title evidence
- ❖ Fees for recordation
- ❖ Filing of legal documents
- ❖ Building permits
- ❖ Attorney fees
- ❖ Private appraisal fees
- ❖ Fees for an independent cost estimate
- ❖ Builders or developer fees
- ❖ Cost of a project audit
- ❖ Affirmative marketing and fair housing information to prospective homeowners and tenants
- ❖ Staff and overhead costs directly related to carrying out the project (all costs must be reasonable and thoroughly documented to include time sheets detailing actual time worked on HOME activities) such as:
 - Work specifications preparation

- Loan processing inspections
 - Other services related to assisting potential owners, tenants, and homebuyers
 - Housing counseling (only for individuals who ultimately occupy a HOME unit)
- ❖ For both new construction and rehabilitation, costs for the payment of impact or other fees that are charged for all projects within a jurisdiction.
 - ❖ Costs of environmental review and release of funds in accordance with Title 24 Part 58 which are directly related to the project.
 - ❖ Costs of funding an initial operating deficit reserve, not to exceed 18 months (ONLY eligible for new construction or rehabilitation projects):
 - Only can be used to pay project operating expenses, scheduled payments to a replacement reserve, and debt service.
 - Any HOME funds placed in an operating deficit reserve that remains unexpended after the period of project rent-up may be retained for project reserves only upon written approval of Community Development Division.
 - ❖ Relocation costs (for persons displaced by the project):
 - Replacement housing payments
 - Moving expenses
 - Other reasonable out-of-pocket costs incurred in the temporary relocation of persons
 - Staff time associated with providing relocation to displaced persons(including referrals, housing search assistance, property inspections, counseling, and other assistance necessary to minimize hardship)

NOTE: Community Development Division federal funds will typically not be used for relocation costs; however Community Development Division **will** require the developer, owner, or sponsor to follow the Uniform Relocation Act (URA) and **will require copies ALL relocation documentation for the project file.** Community Development staff will monitor and ensure that the URA is being followed through the completion of the project.

If the proposed project is determined to be consistent with the current Consolidated Plan, Community Development Staff will send an electronic HOME application to the developer, owner, and/or sponsor.

Procedure 2: Submission of HOME Application

Summary: Developer, Owner, and /or Sponsor submits the completed application with all required backup documents to the Community Development Division.

CDD Staff:

Action:

1. Review the application for completeness and ensure authorized signature is present on the application. Use the HOME Application Checklist, which includes but is not limited to the following:

CHECK LIST FOR REQUIRED DOCUMENTS Please Submit in Order Below (use all check lists that apply to application)	Rental – New Construction	Rental – Rehab	CHDO Operating	Pre-Development & Needs Assess.	APPLICABLE	RECEIVED
“City may Request additional information at any time” Failure to provide accurate/current information may delay the processing of your application. Items in red are required at submission of application.						
Application					Yes <input type="checkbox"/>	
Proof of “active” Registration in SAM’s for Applicant					Yes <input type="checkbox"/>	
Board Resolution Authorizing Application Submission, if applicable					Yes <input type="checkbox"/>	
Most Current Audited Financial Statements					Yes <input type="checkbox"/>	
Evidence of Current CHDO Certification, if applicable					Yes <input type="checkbox"/>	
Locational “Site” Map					Yes <input type="checkbox"/>	
Site & Development Plans (Architect Version)					Yes <input type="checkbox"/>	
Architect’s/Contractor Estimate of Project Costs					Yes <input type="checkbox"/>	
Phase I Environmental					Yes <input type="checkbox"/>	
Procurement Documentation						
Advertisement for Bidding					Yes <input type="checkbox"/>	
Request for Proposals					Yes <input type="checkbox"/>	
Bid Analysis					Yes <input type="checkbox"/>	
Contractor Selection					Yes <input type="checkbox"/>	
General Contractor DUN’s Number					Yes <input type="checkbox"/>	
Proof of “Active” Registration in SAM’s for GC					Yes <input type="checkbox"/>	
General Contractor Contract Agreement					Yes <input type="checkbox"/>	
Evidence of Payment and Performance Bond					Yes <input type="checkbox"/>	
Evidence of Required Insurance Coverages					Yes <input type="checkbox"/>	
Developer Experience					Yes <input type="checkbox"/>	
Property Management Experience					Yes <input type="checkbox"/>	
Project Need / Feasibility / Market Study					Yes <input type="checkbox"/>	
Updated Project Financing Spreadsheets						
Project Development Budget					Yes <input type="checkbox"/>	
Operating Budget					Yes <input type="checkbox"/>	
Financing Sources					Yes <input type="checkbox"/>	
Sources & Uses Budget					Yes <input type="checkbox"/>	
Policies and Procedures for tracking project progress & expenditures					Yes <input type="checkbox"/>	
Certification of Federal Assistance (attachment B)					Yes <input type="checkbox"/>	
Commitment Letters (all funding sources)					Yes <input type="checkbox"/>	
Copy of Tax Credit Application					Yes <input type="checkbox"/>	
Community Notification and Support						
Agency/Applicant met with Ward Council Member					Yes <input type="checkbox"/>	
Public Hearings / Community Meetings					Yes <input type="checkbox"/>	
Minutes					Yes <input type="checkbox"/>	
Comments					Yes <input type="checkbox"/>	
Sign-in Sheets					Yes <input type="checkbox"/>	
Capital Needs Assessment (required for Rehabilitation Projects)					Yes <input type="checkbox"/>	
Appraisal/Market Value*					Yes <input type="checkbox"/>	
Seller/Owner Voluntary Transaction Letter*					Yes <input type="checkbox"/>	

Title*					Yes <input type="checkbox"/>	
Final Settlement Sheet*					Yes <input type="checkbox"/>	
Recorded Special Warranty Deed with Legal Description*					Yes <input type="checkbox"/>	
Relocation Plan, if applicable**					Yes <input type="checkbox"/>	
General Information Notice Tenant "Not Displaced"***					Yes <input type="checkbox"/>	
General Notice of "Non Displacement"***					Yes <input type="checkbox"/>	
Affirmative Marketing Plan					Yes <input type="checkbox"/>	
Tenant Selection Policies & Procedures					Yes <input type="checkbox"/>	
Tenant Application & Lease					Yes <input type="checkbox"/>	
Utility Allowances (Must follow HUD Acceptable Method for Calculating UA's)					Yes <input type="checkbox"/>	
Tenant Occupancy Report					Yes <input type="checkbox"/>	
Section 3 & MBE/WBE Plans					Yes <input type="checkbox"/>	
Final Total Project Cost Certification					Yes <input type="checkbox"/>	
Property Insurance Coverage Policy					Yes <input type="checkbox"/>	

2. Complete the HOME Rental Project Risk Assessment and Underwriting Checklist.

Procedure 3: File Creation

Summary: Subrecipient, Developer, Owner, or Sponsor submits the completion application with all required backup documents to the Community Development Division. All documents shall be placed in the project file in accordance with the Divider Checklist.

CDD Staff:

Action:

1. Create Project File Master Checklist
2. Create Project File Divider Checklist
3. Place application packet into project file in accordance with the divider checklist.
4. Verify that the applicant (Subrecipient, developer, owner, and/or sponsor) and architect is not debarred on the System of Award Management (SAM).
5. Complete the Eligibility Review Memo
6. Complete the Davis Bacon – Labor Standards Determination
7. Complete the Environmental Review
8. Supervisor or CD Manager's signature and date at bottom of the divider checklist will verify file review for that section is complete.
9. Complete an evaluation of the application – pre-award assessment – to include but not limited to the following:
 - a. Project Need – Is it consistent with current Consolidated Plan?
 - b. Management Capability – Does the development team have the capability to complete and manage the project?
 - c. Environmental Impact – Is the project negatively impacted by air/water quality issues, noise levels or floodplain proximity? Is there a favorable environmental assessment?
 - d. Neighborhood Support – Is the project supported by the community (through letters of support, neighborhood meetings minutes, petitions, etc.)?
 - e. Design Standards, Unit Configuration and Layout – Has the project been presented to Office of Development Assistance (ODA)? Does the project fit in well with the existing neighborhood fabric? Is the location of the project and configuration of units well-designed for target tenants (e.g., on a bus line, train system, elevators in a senior building, etc.)? Are the suggested materials to be used durable, low maintenance and appropriate to last through the predicted affordability period?
 - f. Target Populations – Does the project provide housing for special needs populations, such as the elderly, disabled, homeless or chronically mentally ill, or for large families or extremely low-income households?
 - g. If project is making an application for 4% non-competitive, 4% Federal Credit & State Tax Credit, or 9% Low-income Housing Tax Credits through CHFA, staff may provide a letter of consistency with possible funding if they are successful in obtaining the tax credit.

Example: “The City of Aurora has identified the issue of housing affordability as a significant community need. The City has documented its housing needs in its 2015-2019 Consolidated Plan. Rental housing affordable to working families is a significant housing need identified within this planning document. The XXXXX is proposing to develop affordable rental housing at xxxxxxxx, Aurora, CO. We would welcome the opportunity to explore a partnership, per funding availability, with XXXXX if they are successful with securing the (state tax credit they are applying for).

10. Obtain file review signature by Supervisor or CD Manager required at the bottom of each divider checklist.

Procedure 4: Project Underwriting and Subsidy Layering

Summary: Underwriting and Subsidy Layer Policies and Procedures will be followed by CDD staff to ensure that a HUD HOME underwriting and subsidy layering review has been completed for each rental housing application that is considered for HOME funding following HUD Notice CPD 15-11.

Below is a brief outline of the steps that will be followed and documents used to ensure that only the amount of HOME funding necessary is used for any rental project. Staff will certify that they have completed each step by completing the HOME Units tab of the Budget Worksheet, the HOME units Calculation Worksheet to determine the number of required HOME units and HOME Cost allocation Tool (CAT) developed by HUD (if necessary) and by placing all backup documentation in the Project file.

CDD Staff:

Action:

1. Determine the HOME Project Activity Type: CDD staff will review application for funding to determine the type of project activity:
 - Acquisition only
 - Acquisition and Rehabilitation
 - Rehabilitation Only
 - New Construction
2. Using the Financing Spreadsheet, the staff will review the:
 - Project development budget
 - Project income,
 - Operating expenses (rental), and
 - Financing structure
3. **Development Costs** - Using the Financing Spreadsheet (State of CO Budget Worksheet) review development costs to ensure that they are in the range of normal costs within Colorado and meet the HOME requirements for subsidy limits. These determinations can be made by reviewing the Assessment NC or Assessment Rehab, and HOME unit's tabs. The City of Aurora will use the Colorado Division of Housing cost ranges and the HOME subsidy limits to determine if costs are reasonable. Are they reasonable compared to other similar projects funded by or under development in Aurora and the Denver Metro Area?

Note any discrepancies and reasons for cost variances from reasonable costs and the HOME subsidy limits and purchase price limits. Review project operating expenses to ensure that they fall within the norm for similar projects.
4. **Sources and Uses** - Review the sources and uses in the Financing Spreadsheet and the documentation that funds are committed to the project (application exhibits) to ensure that all funding commitments have been made to the project, and not any pending commitments that must be made before a final HOME award and contract is made. Verify all costs to be paid for with HOME funds eligible under the HOME Program.

5. **Maximum HOME Subsidy Limit** - Using the same HOME Units tab and HOME Cost/Unit Tool, determine the number of required HOME-assisted units, and HOME Unit Cost Allocation (following CPD Notice 16-15). The average per-unit HOME investment may not exceed the HOME maximum per unit subsidy.

Using information from the Financing Spreadsheet, the spreadsheet will calculate the number of HOME units using the HOME pro-ratio of total HOME funding to total project costs (as outline in CPD notice 16-15 if the units comparable), and checking to ensure that the total HOME subsidy does not exceed the HOME subsidy limits listed on the spreadsheet. CDD will adjust the number of HOME-assisted units up or reduce the total amount of HOME subsidy if necessary so as not to exceed HOME per unit subsidy limits.

6. **Actual Cost Method of Cost Allocation** - Aurora uses the Hybrid method to allocate costs and determine HOME-assisted units. All HOME designated rental units shall be **floating** HOME units, unless units are not comparable or the project contains public housing units (then the Standard Method will be used). The Financing Spreadsheet will calculate the distribution of HOME-assisted units between various unit types and between High and Low HOME rent units.

For rental projects, using the OpPro tab, ensure that project operating costs are reasonable and include all items necessary to operate a rental property. Certify the Per Unit Per Annum (PUPA, the total cost per unit to operate a property) is acceptable for the Aurora rental market, operating costs and management fees are within general guidelines for rental properties. Follow State of Colorado Division of Housing cost ranges.

7. **Current Market Demand, Site and Neighborhood Standards** – Review the market study and Site and Neighborhood Standards (if applicable) documents to assess, at a minimum, that there is current market demand in the neighborhood in which the project will be located for rentals. Review the Site and Neighborhood Standards Attachment to ensure that the project meets these standards.
8. **Evaluation of Developer Qualifications/Capacity** – Evaluate the qualifications of the developer, including experience and developer capacity.
9. **Underwriting Summary and Project Evaluation** – Complete an application review following HOME rules and requirements. The review should include issues such as Davis Bacon wage rates, environmental review, relocation requirements, HOME-assisted unit requirements, income and rent limits (if not new construction; if new construction the income and rent limits will be evaluated prior to the completion of the project).

The subsidy layering and/or underwriting must demonstrate that the PJ is not investing any more HOME funds, alone or in combination with other funds, than are necessary to provide quality, affordable, and financially viable housing for at least the duration of the affordability period.

10. **CDD Staff Project Review** – Complete Staff Review and determine funding recommendations/decisions. Documentation of the review shall be kept in the project file, along with a copy of the Application, Financing Spreadsheet and the Application

Review and Underwriting Checklist (see file checklist for a complete list of all documents that will be kept in the project file).

Procedure 5: Project Approval For HOME Affordable Housing Applications

Summary: Presentation of the application to the Citizens' Advisory Committee on Housing and Community Development (CHD) – can include Tax Credit projects, rehabilitation projects, etc. and may or may not be requesting HOME Program Income.

NOTE: If the HOME funding request is pending a 4% Non-competitive, 4% Federal Credit & State Tax Credit, or 9% Low-income Housing Tax Credit applicant, the funding request will not be presented to the CHD until CHFA has awarded the project the equity credit and initial underwriting, subsidy layering, developer and contractor capacity has been determined.

CDD Staff:

Action:

1. CDD staff will provide information for the next scheduled CHD meeting/public meeting. Information included will include but not be limited to:
 - Project Information
 - Developer Information
 - Ownership Entity
 - Amenities
 - Proposed Rents/Price
 - Financing Sources
 - Terms of Primary Financing
 - Breakdown of Uses of Funds
 - Project Cost Analysis
 - Market Analysis, if applicable
 - Capital Needs Assessment, if applicable
 - Developer Capacity
 - Staff Recommendation
2. During the CHD meeting/Public Hearing the Developer and Developer Team will give a short presentation to the committee on their proposed project and answer any questions the committee members may have on the project. CHD may vote on the funding request or they may table the request until the next scheduled meeting. If there is no vote during the presentation meeting, then the developer will return to the next scheduled meeting to answer any new questions. Presentation and/or vote will be reflected in the meeting minutes. Copy of the minutes from the meeting will be placed in the project file.
3. If the CHD committee does not approve the funding request, CDD staff will provide a written letter to the developer on why the request was not approved and be informed of their right to appeal. If the request for funding is approved, CDD staff will go to the next procedure.
4. The HOME Grant-Based Accounting Interim Rule dated 12/2/2016 will apply whenever possible on the affordable housing projects that are awarded Tax credits. Under the provisions of the rule, the PJ may accumulate program income, repaid funds, and recaptured funds it receives during the program year, rather than being required to expend them for the next eligible draw. The PJ is now required to include any uncommitted program income, repaid funds, or recaptured funds it received during the previous program year in the resources it describes in its annual action plan

{§91.220(1)(2)(i) and §91.320(k)(2)(i)}. The PJ may, but is not required, to also include any funds it anticipates receiving during the program year for which the annual action plan is being submitted.

Procedure 6: Public Hearings /Meeting/ Notices and Request for Release of Funds

Summary: Steps for posting of Public Notices, Public Meetings, and Notices as identified in the current Citizen's Participation Plan.

CDD Staff:

Action:

1. CDD staff will prepare Public Notice for annual Public Hearings to be published at least 15 days prior to the Hearings. Follow established procedures in the "Citizen Participation Plan" for entire Action Plan Process, including the posting for a later 30-day comment period for draft Action Plan.
2. For Annual Action Plan activities: Annual Public Hearings are held for activities (typically the second and third Tuesday in July).
3. For Substantial Amendments to Con Plan or Action Plan, if required: CDD staff prepares a Public Notice for the 30-day comment period in both **The Aurora Sentinel** and **City of Aurora Website**.

Steps for posting of Public Notices:

- A. Prepare notice for Spanish translation, then send to translator service with a request for translation (APDC/CLC or other). If there are no major changes on the notice template, in-house staff may translate.
 - B. Send both English/Spanish notices with a Request for Publication to the City Clerk's Office by Wednesday at 10 AM for the following Thursday publication.
 - C. Send both English/Spanish notices to Community Development Division staff to post on CD webpage before the Thursday Sentinel posting. Once posted, print our website for confirmation.
 - D. The Citizen Participation Plan outlines optional outreach efforts, such as posting at six public locations (CD staff to hand post at MLK Library and CD office; PROS staff to post at Moorhead Recreation Center, Hoffman Heights, Crawford ES Community Center, and Aurora Center for Active Adults), and notify email list for Aurora Action Coalition for Community Services (AACCS).
 - E. Print out all notification efforts (for the Action Plan Amendment file, and print out the Proof of Publication for both Action Plan Amendment file and the project file.
4. At completion of required advertisement (Action Plan / Amendment), CDD staff will prepare and forward the Request for Release of Funds (RROF) to HUD. Upon receipt of the official RROF approval from HUD, CDD staff shall issue the Notice of Award to the applicant.

Summary: Steps to the commitment of HOME funds to the project

CDD Staff:

Action:

1. CDD staff will review project file for completeness, ensuring each project is in accordance with the underwriting and subsidy layering requirements, ensuring no changes have occurred. If any substantial changes in funding sources, project costs, etc. have occurred then the project will need to be re-evaluated to ensure that the PJ is not investing any more HOME funds, alone or in combination with other funds, than are necessary to provide quality, affordable, and financially viable housing for at least the duration of the affordability period.
2. Prepare the Subrecipient Agreement (SA), if applicable.
3. Prepare the Loan Agreement, if applicable.
4. Prepare the Promissory Note, if applicable.
5. Prepare the Deed of Trust, if applicable.
6. Prepare the HOME Beneficiary & Rent Use Covenant.
7. Prepare Subordination & Intercreditor Agreement, if applicable.
8. Prepare loan set up form, if applicable.
9. Put together the Subrecipient Agreement Packet (which includes applicable documents as described above items 2 – 7 as applicable to the project); send copies to the Subrecipient, Owner, Developer, or Sponsor for their legal review.
10. Once the Subrecipient has completed their legal review, make any required changes to the document(s). Forward final documents to CDD's assigned Assistant City Attorney for legal review and approval to form. Make any noted edits.
11. Send at least one (1) copy of the unsigned approved documents to Subrecipient, Owner, Developer or Sponsor for appropriate signature. Once the Subrecipient has signed all required documents, route all signed copies through city approval / signature process, obtain signature on documents from the CDD's assigned Deputy City Manager.
12. Prepare and Issue the Notice to Proceed to the Subrecipient, attach one signed original of the Subrecipient Agreement Packet. This is now the executed document.
13. Prepare and submit the Rental Set-Up and Completion Form – HOME Program – to CDD's Financial Analyst for set up in the HUD IDIS system.
14. Financial Analyst, or designated CDD staff, will complete the FFATA Reporting. NOTE: FFATA reporting system has been off-line for a couple of years, Financial Analyst is

keeping a log of Agreements and/or Contracts to input into the system once it comes back online.

CDD Staff:

Action:

Summary: Provide guidelines for purchasing and contracting for supplies, equipment, construction, and other services acquired in whole or in part with HOME funds. Any entity providing services, supplies, or equipment to a HOME activity must ensure that all applicable federal and state procurement requirements are followed throughout the process as set forth at 2 CFR Part 200 of the Uniform Administrative Requirements.

In accordance with 2 CFR 200.318, the City must use its own documented procurement procedures which reflect applicable State, local, and tribal laws and regulations, provided that the procurement procedures conform to applicable federal law. Regulations require Grantees and their Subrecipients (Subrecipients, Owners, Developers and/or Sponsors) to conduct procurement in a manner providing full and open competition when federal funds are used for construction (2 CFR 200.319). The City must comply with all obligations under its agreement with HUD to ensure full compliance when using HOME funds to purchase goods and services. Listed below are the methods of procurement permitted by HUD (2 CFR 200.320). While HUD allows for procurement by noncompetitive proposals, the City of Aurora prefers the use of methods 3 and 4 to ensure an open and competitive bid process. On a case by case basis, noncompetitive proposals may be considered if circumstances warrant. Community Development staff will make the determination and approve all procurement methods. If funds are used for Soft Costs, evidence of procurement will not be required.

Methods of Procurement – To ensure compliance with 2 CFR 200.320, the following methods of procurement are allowable using HOME funds:

- Procurement by micro-purchases
- Procurement by small purchase procedures
- Procurement by sealed bids (formal advertising)
- Procurement by competitive proposals
- Procurement by noncompetitive proposals

1. Procurement by micro-purchases 2 CFR 200.320 (a)-

Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (\$200.67 Micro-purchase). To the extent practicable, the non-federal entity must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-federal entity considers the price to be reasonable.

2. Procurement by small purchase procedures 2 CFR 200.320 (b)-

Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.

3. Procurement by sealed bids (formal advertising) 2CFR 200.320 (c)-

Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction, if the conditions in paragraph (c) (1) of this section apply.

(1) In order for sealed bidding to be feasible, the following conditions should be present:

- ❖ A complete, adequate, and realistic specification or purchase description is available;
- ❖ Two or more responsible bidders are willing and able to compete effectively for the business; and
- ❖ The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

(2) If sealed bids are used, the following requirements apply:

- ❖ Bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for opening the bids, for local, and tribal governments, the invitation for bids must be publicly advertised;
- ❖ The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond;
- ❖ All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly;
- ❖ A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and
- ❖ Any or all bids may be rejected if there is a sound documented reason.

4. Procurement by competitive proposals 2 CFR 200.320 (d)-

The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

- (1) Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical;
- (2) Proposals must be solicited from an adequate number of qualified sources;
- (3) The non-federal entity must have a written method for conducting technical evaluations of the proposals received and for selecting recipients;
- (4) Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and
- (5) The non-federal entity may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.

5. Procurement by noncompetitive proposals 2 CFR 200.320 (f)-

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

- (1) The item is available only from a single source;
- (2) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- (3) The federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-federal entity; or
- (4) After solicitation of a number of sources, competition is determined inadequate.

Project coordinators need to be aware that local law and policies may require additional procedures or set different dollar value thresholds for some forms of procurement. Procurements must be conducted in a manner that prohibits the use of statutorily or administratively imposed in-State or local geographical preferences in the evaluation of bids or proposals, except in those cases where federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts State licensing laws.

Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms.

(a) The non-federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

(b) Affirmative steps must include:

- (1) Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- (2) Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
- (3) Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
- (4) Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
- (5) Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
- (6) Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (1) through (5) of this section.

Certification Regarding Debarment, Suspension – For every federally-assisted contract or subcontract to be awarded, regardless of the nature of the work, CDD must verify if the proposed company are on the debarred list maintained by the U.S. General Services Administration (GSA) titled the list of Parties Excluded from Federal Procurement and Non-procurement Programs. The website currently required to use is: System of Award Management (SAM) <https://www.sam.gov>.

CDD must check the federal list of debarred contractors (24 CFR 570.489(l)):

- All Contractors
- All Subrecipients
- All local units of government

Section 3 Requirements – Section 3 is a provision of the HUD Act of 1968 that helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency. The Section 3 program requires that recipients of certain HUD financial assistance, to the greatest extent feasible, provide job training, employment, and contracting opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods.

Section 3 applies to certain HUD-funded Housing and Community Development projects that complete housing rehabilitation, housing construction, and other public construction. (See established Section 3 policies and procedures manual)

CDD staff must ensure that procurement processes include the notification and compliance to Section 3, to the greatest extent feasible to include but not limited to:

- Section 3 statement included in construction bid documents, as applicable
- Section 3 statement included in awarded contracts, as applicable

Federal Labor Requirements per 24 CFR 92.354 – Every contract for the construction (rehabilitation or new construction) of **housing** that includes 12 or more units assisted with HOME funds must contain a provision requiring that payment of not less than the wages prevailing in the locality, as predetermined by the Secretary of Labor pursuant to the Davis-Bacon Act (40 U.S.C. 3141), to all laborers and mechanics employed in the development of any part of the housing. Such contracts must also be subject to the overtime provisions, as applicable, of the Contract Work Hours and Safety Standards Act (40 U.S.C. 3701).

- CDD staff is responsible for ensuring compliance by contractors and subcontractors with labor standards described per 24 CRR 92.354. (see established Davis-Bacon Policies and Procedures Manual)

Additional Contract Provisions under Federal Awards

The following contract provisions shall be included in all building construction contracts:

PART 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND
AUDIT REQUIREMENTS FOR
FEDERAL AWARDS
Subpart F—Audit Requirements

APPENDIX II TO PART 200—CONTRACT PROVISIONS FOR NON-FEDERAL ENTITY CONTRACTS UNDER FEDERAL AWARDS

In addition to other provisions required by the federal agency or non-federal entity, all contracts made by the non-federal entity under the federal award must contain provisions covering the following, as applicable.

(A) Contracts for more than the simplified acquisition threshold currently set at \$150,000, which is the inflation adjusted amount determined by the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils) as authorized by 41 U.S.C. 1908, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.

(B) All contracts in excess of \$10,000 must address termination for cause and for convenience by the non-federal entity including the manner by which it will be effected and the basis for settlement.

(C) Equal Employment Opportunity. Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of “federally assisted construction contract” in 41 CFR Part 60-1.3 must include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, “Equal Employment Opportunity” (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, “Amending Executive

Order 11246 Relating to Equal Employment Opportunity,” and implementing regulations at 41 CFR part 60, “Office of Federal Contract Compliance Programs, Equal Employment Opportunity, and the Department of Labor.”

(D) Davis-Bacon Act, as amended (40 U.S.C. 3141-3148). When required by federal program legislation, all prime construction contracts in excess of \$2,000 awarded by non-federal entities must include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 3141-3144, and 3146-3148) as supplemented by Department of Labor regulations (29 CFR Part 5, “Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction”). In accordance with the statute, contractors must be required to pay wages to laborers and mechanics at a rate not less than the prevailing wages specified in a wage determination made by the Secretary of Labor. In addition, contractors must be required to pay wages not less than once a week. The non-federal entity must place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation. The decision to award a contract or subcontract must be conditioned upon the acceptance of the wage determination. The non-federal entity must report all suspected or reported violations to the federal awarding agency. The contracts must also include a provision for compliance with the Copeland “Anti-Kickback” Act (40 U.S.C. 3145), as supplemented by Department of Labor regulations (29 CFR Part 3, “Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States”). The Act provides that each contractor or subrecipient must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled. The non-federal entity must report all suspected or reported violations to the federal awarding agency.

(E) Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708). Where applicable, all contracts awarded by the non-federal entity in excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702 of the Act, each contractor must be required to compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be required to work in surroundings or under working conditions which are unsanitary, hazardous or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence.

(F) Rights to Inventions Made Under a Contract or Agreement. If the federal award meets the definition of “funding agreement” under 37 CFR §401.2 (a) and the recipient or subrecipient wishes to enter into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that “funding agreement,” the recipient or subrecipient must comply with the requirements of 37 CFR Part 401, “Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements,” and any implementing regulations issued by the awarding agency.

(G) Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended—Contracts and subgrants of amounts in excess of \$150,000 must contain a provision that requires the non-federal award to agree to comply with all

applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251-1387). Violations must be reported to the federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).

(H) Debarment and Suspension (Executive Orders 12549 and 12689)—A contract award (see 2 CFR 180.220) must not be made to parties listed on the government wide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), “Debarment and Suspension.” SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.

(I) Byrd Anti-Lobbying Amendment (31 U.S.C. 1352)—Contractors that apply or bid for an award exceeding \$100,000 must file the required certification. Each tier certifies to the tier above that it will not and has not used federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-federal funds that takes place in connection with obtaining any federal award. Such disclosures are forwarded from tier to tier up to the non-federal award.

(J) See §200.322 Procurement of recovered materials.

Procurement Recordkeeping Requirements

- Qualifications statements, copies of RFPs, and proposals received;
- Advertisement of Invitation to Bid / RFP;
- Bid Analysis (review of bids received);
- Bid Procurement (selection/rejection of General Contractor (GC));
- The selected GC’s written cost estimate used to determine cost reasonableness (or RFP as applicable);
- Davis Bacon Wage Rate Determination, if applicable;
- Section 3 Documentation (see established Policy and Procedures Manual);
- A copy of the contract awarded;
- Copy of the Payment and Performance Bond;
- Copy of all licenses and insurance, as applicable;
- Copies of any contract amendments/change orders, as applicable;
- A copy of the Notice to Proceed / Purchase Order, as applicable;

Payment Request Reimbursements to the Subrecipient – Payment requests to the Subrecipient will be completed on a reimbursement process. The PJ may select to withhold 5% retainage per each request, OR may elect to hold the entire 5% retainage from the final payment request. Each payment reimbursement request must accompany backup documentation of funds the Subrecipient has disbursed. The retainage, may be release when all requirements have been met per the agreement, and Notice of Final Settlement has been published as required.

Reimbursement request may be made on a weekly basis, CDD staff must certify that only HOME eligible activities are reimbursable (see eligible HOME activities at the end of this p & p).

Copies of the payment requests will be placed in the project file as identified by the project file divider forms.

Quarterly Reports, as applicable – Quarterly reports are required during the construction of the project as follows (except when CDD staff oversees the construction):

- Quarter 1: Jan. 1 thru Mar. 31
- Quarter 2: Apr. 1 thru June 30
- Quarter 3: Jul. 1 thru Sept. 30
- Quarter 4: Oct. 1 thru Dec. 31

Pre-construction Project Requirements – CDD must approve the initial rent schedule and utility allowances for each HOME funded project.

NOTE: Annual HOME rents and utility allowances will be reviewed in accordance with the established Monitoring Policies and Procedures Manual.

The Subrecipient will be required to provide the following documents, prior to lease-up of the units, to CDD staff for review and approval:

1. Affirmative Marketing Plan;
2. Tenant Selection Policies and Procedures;
3. Tenant Application;
4. Tenant Lease Agreement;
5. Utility Allowances (Following a HUD approved methodology);
6. Proof of Insurance coverage on the project;
7. Section 3 and MBE/WBE Plans (final report);

Construction Project Close-Out

CDD staff will complete the final close out of the construction file as follows:

- Quarterly Reports;
- Construction Progress Inspections (Documentation from the Inspections Department);
- Certificate of Occupancy;
- Project Close-Out (Monitoring File).

Occupancy and Lease-up Requirements

The HOME Rule provides timeframes for the lease-up of assisted rental housing as follows:

- Within six months of project completion, if all the units in the project are not occupied by eligible tenants, HUD requires the PJ to submit marketing information and, if appropriate,

a marketing plan to demonstrate what steps will be taken to get the vacant unit(s) rented.

- Within 18 months of the date of project completion, if the housing is not occupied by eligible tenants, the project will be considered ineligible and the PJ will be required to repay to HUD the HOME funds invested in the vacant units. If some of the units in the project are rented, this amount can be pro-rated.
- ◆ Project completion occurs with title transfer and construction is complete, HOME requirements (including property standards) have been met, and final drawdown has been disbursed in IDIS.
- To prevent this situation, CDD staff will carefully review rental market studies to ensure there is a market demand for the housing prior to making a funding commitment. The required market study will indicate the amount of time needed for rent-up given the target population (e.g., low-income, elderly, or family); proposed rents; location; and service area.

At Initial Lease-up (Leases)

- There must be a written lease between the subrecipient/owner and the tenant of a HOME-assisted rental unit.
- The lease must be for at least one (1) year, unless by mutual agreement between the tenant and the owner.
- CDD staff shall ensure owners and property managers are following state and local tenant landlord law as it relates to the lease timeframe. State and local tenant landlord law or common practice may provide for a shorter lease term in some jurisdiction; nonetheless, the shorter the lease may only be used in a HOME-assisted unit if it is mutually agreeable between the tenant and owner.
- The lease between the subrecipient and tenant in a HOME-assisted property **can not** contain any of the following provisions (leases will be checked annually in accordance with established Monitoring Policies and Procedures after the initial lease-up):
 - Agreement to be sued: Agreement by the tenant to be sued, to admit guilt or to a judgment in favor of the owner in a lawsuit brought in connection with the lease.
 - Treatment of property: Agreement by the tenant that the owner may seize or sell personal property of household members without notice to the tenant and a court decision on the rights of the parties. This provision does not apply to disposition of personal property left by a tenant who has vacated a property.
 - Excusing owner from responsibility: Agreement by the tenant not to hold the owner or the owner's agents legally responsible for any action or failure to act, whether intentional or negligent.
 - Waiver of notice: Agreement of the tenant that the owner may institute a lawsuit without notice to the tenant.

- Waiver of legal proceedings: Agreement of the tenant that the owner may evict the tenant of household members without instituting a civil court proceeding in which the tenant has the opportunity to present a defense, or before a court decision on the rights of the parties.
 - Waiver of jury trial: Agreement by the tenant to waive any right to a trial by jury.
 - Waiver of right to appeal court decision: Agreement by the tenant to waive the tenant's right to appeal or to otherwise challenge in court a court decision in connection with the lease.
 - Tenant chargeable with cost of legal actions regardless of outcome: Agreement by the tenant to pay attorney's fees or other legal costs, even if the tenant wins in a court proceeding by the owner against the tenant. The tenant, however, may be obligated to pay costs if the tenant loses.
 - Mandatory supportive services: The lease cannot require a tenant to accept mandatory supportive services with an exception for residents of transitional housing.
- Subrecipient may terminate tenancy or refuse to renew a lease only upon 30 days' written notice, and only for: serious or repeated violation of the terms and conditions of the lease; violation of applicable federal, state or local law; completion of the tenancy period for transitional housing or for other good causes.
 - An increase in the tenant's income does not constitute good cause for termination or refusal of a new lease.
 - Failure to participate in supportive services ***in transitional housing only*** may be grounds for terminating tenancy or not renewing a lease.

Tenant Selection (at initial lease-up)

- The subrecipient of HOME-assisted rental housing must comply with the PJ's affirmative marketing requirements. PJs should review the owner's affirmative marketing practices during desk and/or on-site monitoring.
- The subrecipient of HOME-assisted rental housing must adopt and follow written tenant selection policies and criteria that:
 - Limit the HOME-assisted housing to very low-income and low-income families as specified in the agreement;
 - Are reasonably related to the applicants' ability to perform the obligations of the lease;
 - Provide for the selection of tenants from a written waiting list in the chronological order of their application, insofar as is practicable; and
 - Give prompt written notification to any rejected applicant of the grounds for any rejection.

- The subrecipient cannot exclude an applicant with a certificate or voucher under the Section 8 Tenant-Based Assistance Housing Choice Voucher Program (per 24 CFR part 982) or a participant in a HOME tenant-based rental assistance program.

Conflict of Interest and Appeals Policy

The City of Aurora, Community Development Division Conflict of Interest and Appeals Procedures Incorporated into All Community Development Programs and Projects approved by HUD and last revised in 2011 as follows:

The City of Aurora issued AMP NO. 3-22 on March 5, 1997, revised August 28, 2007. The APM defines a conflict of interest as ***“any interest, direct or indirect, and in particular, financial, which may appear to or be construed to imply that an employee would or might benefit from his or her position with the City.”*** This implies to any transaction between an employee and any outside business, organization, or individual, including a fellow employee. Some Examples:

- To give or receive anything of value which could be construed as a bribe, kickback or payoff;
- To accept additional compensation of any sort of services or time for which the employee is being paid by the City;
- To use or reveal to anyone, without appropriate authority or specific authorization to do so, confidential information concerning the City including its operation and personnel;
- To use or permit others to use employees, vehicles, materials, computers, software, funds or other City equipment or property for personal purposes without receiving prior approval from an immediate supervisor and Department Director, Assistant or Deputy City Manager;
- To have a spouse or relative who owns and/or operates a business conduct any business with the City unless the City Attorney’s Office has rendered a determination that the business relationship is not a conflict of interest for a City employee;
- To serve as an officer, director, or consultant of, be a principal owner of, or receive any form of income in these capacities from any enterprise doing business with the City.

U.S. Department of Housing and Urban Development (HUD) Regulations, 24 CFR Part 85, Section 85.36(b), “Code of Conduct” and 24 CFR Part 570.489(h), “Conflict of Interest” address this issue as follows: “No employee, officer or agent of the grantee or sub-grantee shall participate in selection, or in the award or administration of a contract supported by federal funds if a conflict of interest, real or apparent, would be involved.” The City is bound to formulate Policies and Procedures that comply with HUD Regulations, 24 CFR Part 85, Section 85.36(b)(3), “Code of Conduct” and 24 CFR Pat 570.489(h) and 570.611, “Conflict of Interest”, herein below:

“No employee, officer or agent of the grantee or sub-grantee shall participate in selection, or in the award or administration of a contract supported by federal funds if a conflict of interest, real or apparent, would be involved.” Such a conflict would arise:

- (Code of Conduct) The employee, officer or agent; any member of his/her immediate family; his or her partner; or an organization which employs or is about to employ, any of the above, has a financial or other interest in the firm selected for award. The grantee’s or sub-grantee’s officers, employees or agents will neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors or parties to sub-agreements.
- (Conflict of Interest) Except for eligible administrative or personal costs, the general rule is that no persons who exercise or have exercised any functions or responsibilities with respect to CDBG activities assisted under this subpart or who are in a position to participate in a decision making process or gain inside information with regard to such activities may obtain a financial interest or benefit from the contract, subcontract or agreement with respect thereto, or the proceeds there under, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

The following procedures shall be incorporated into all programs administered by the City of Aurora, Community Development Division:

CONFLICT OF INTEREST:

Persons and Organizations Covered

- The City of Aurora as the Grantee;
- An employee of the City of Aurora’s Community Development Division;
- An employee of the City of Aurora;
- An elected official of the City of Aurora;
- An agent that has a financial interest in Community Development Activities:
 - Contractors
 - Real Estate Agents
 - Consultants
- The Grantee’s sub-grantees;
- Sub-grantee’s officers, employees or agents;
- A member of any board or committee that oversees, advises, approves, or recommends on any issues involving Community Development;
- An immediate family member of any of the above.

Procedures – A Covered Person or Organization

When a covered person or organization applies for any program administered by the City of Aurora, Community Development, then the following step-by-step procedures shall be followed:

The Project Manager or Programs Supervisor shall:

1. Advise the applicant/participant they/he/she is a person or organization covered by the regulation, advise the Community Development Manager and document the file accordingly;
2. The Community Development Manager shall advise the Assistant City Attorney and the Department Director and shall provide all relevant information and complete documentation, to include but not be limited to the following:
 - Identify the City department the employee is employed at;
 - Provide a copy of the employees most current Job Description when available (either from the employee or Human Resources Dept.);
 - Describe the relationship the employee has with the Community Development Program(s) and forward the information to the Assistant City Attorney for review of State and local laws and regulation pertaining to Conflict of Interest. The Assistant City Attorney shall, after a thorough review of the appropriate State and local regulations, provide a formal opinion to the Community Development Manager:
 - a. When the Assistant City Attorney concludes that the application or participation ***is in violation*** of State and/or local regulations:
 - i. The application process immediately ceases and the applicant/participant is advised accordingly via a formal notification;
 - ii. A copy of the formal notification is placed in the file and the file is closed.
 - b. When the Assistant City Attorney concludes that the applicant/participant is ***not in violation*** of State and/or local regulations:
 - i. The formal opinion of the Assistant City Attorney, along with documentation of the facts and circumstance of the application, will be forwarded to the Department of Housing and Urban Development (HUD) for review and approval/denial of a **waiver** to permit the cited applicant to participate in the applicable program.
 - c. If the Assistant City Attorney concludes that the applicant/participant ***is not in violation*** of State and/or local regulations but it could be ***in violation of federal regulations***:
 - i. The formal written opinion of the Assistant City Attorney will be forwarded to the Department of Housing and Urban Development (HUD) for review and approval/denial of **waiver** to permit the cited applicant to participate in the applicable program.

NOTE: When the applicant is an employee of the City of Aurora (permanent or contract, but not including temp services) but is otherwise not connected with the Community Development Division (i.e., works in another Division or Department of the City of Aurora and has no

involvement with the activities associated with Community Development programs), **AND** the Assistant City Attorney concludes that the applicant/participation is not in violation of state or local regulations, the application will not be forwarded to HUD for review for a waiver since the HUD CDP written exception threshold is not met and a formal exemption from HUD is not required. The city's written determination shall be documented in the applicant's file and shall be used to serve HUD's monitoring review purposes.

The Manager of Community Development shall provide the following documentation to HUD as follows:

- Memorandum to HUD requesting a written waiver in regards to the Conflict of Interest; and,
- Copy of the Conflict of Interest determination from the Assistant City Attorney

If approved, the waiver letter will be placed in the file and the project will continue to the next process as specified under the policies and procedures of the applicable program. If the waiver is denied, the waiver denial letter will be placed in the file and the applicant will be given written notice from Community Development of their in-eligibility.

Upon approval from HUD, staff will inform the Citizens' Advisory Committee on Housing and Community Development (CHD) at the next regularly scheduled meeting of the final determination. Information regarding this determination, provide to CHD, will be general in nature and will adhere to all applicable client confidentiality requirements.

NOTE: Emails from HUD and signature approval can be found on the F:drive

Rev Oct. 1998
Rev Sept. 2007
Rev Jan. 2009
Rev Jul. 2010
Rev Jan. 2011

CHAPTER 8

ELIGIBLE COSTS [§92.206]

HOME funds may be used to pay the following eligible costs:

(a) Development hard costs. The actual cost of constructing or rehabilitation of housing. The costs include the following:

1. For new construction projects, costs to meet the new construction standards in §92.251;
2. For rehabilitation, costs to meet the property standards for rehabilitation projects in §92.251;
3. For both new construction and rehabilitation costs:
 - To demolish existing structures;
 - To make utility connections including off-site connections from the property line to the adjacent street; and
 - To make improvements to the project site that are in keeping with improvements of surrounding, standard projects. Site improvements may include on-site roads and sewer and water lines necessary to develop of the project. The project site is the property, owned by the owner, upon which the project is located.
4. For both new construction and rehabilitation of multifamily rental housing projects, costs to construct or rehabilitate laundry and community facilities that are located within the same building as the housing and which are for the use of the project residents and their guests.
5. Costs to make utility connections or to make improvements to the project site, in accordance with the provisions of §92.206(a)(3)(ii) and (iii) are also eligible in connection with acquisition of standard housing.

(b) Refinancing costs. The cost to refinance existing debt secured by a housing project that is being rehabilitated with HOME funds. These costs include:

- 1) For single-family (one- to four- family) owner-occupied housing, when loaning HOME funds for rehabilitating housing, if the refinancing is necessary to reduce the overall housing costs to the borrower and make the housing more affordable and if the rehabilitation cost is greater than the amount of debt that is refinanced.
- 2) For single family or multifamily projects, when loaning HOME funds for the rehabilitation of the units, if refinancing is necessary to permit or continue affordability under §92.252. The PJ must established refinancing guidelines and state them in its consolidated plan described in 24 CFR part 91. Regardless of the amount of HOME funds invested, the

minimum affordability period is 15 years. The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum, the guidelines must:

- i. 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;
- ii. Require a review of management practices to demonstrate that disinvestment in the property has not occurred, that the long term needs of the project can be met and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated;
- iii. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both;
- iv. Specify the required period of affordability, whether it is the minimum 15 years or longer;
- v. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a federally designed Empowerment Zone or Enterprise Community; and
- vi. State that HOME funds cannot be used to refinance single family or multifamily housing loans made or insured by any federal program, including CDBG.

(c) Acquisition costs. Cost of acquiring improved or unimproved real property, including acquisition by homebuyers.

(d) Related soft costs. Other reasonable and necessary costs incurred by the owner or PJ and associated with the financing, or development (or both) of new construction, rehabilitation or acquisition of housing assisted with HOME funds. These costs include, but are not limited to:

- 1) Architectural, engineering, or related professional services required to prepare plans, drawings, specifications, or work write-ups. The costs may be paid if they were incurred not more than 24 months before the date that HOME funds are committed to the project and the PJ expressly permits HOME funds to be used to pay the costs in the written agreement committing the funds.
- 2) Costs to process and settle the financing for a project, such as private lender origination fees, credit reports, fees for title evidence, fees for recordation and filing of legal documents, building permits, attorney's fees, private appraisal fees and fees for an independent cost estimate, builders or developer fees.
- 3) Costs of a project audit, including certification of costs performed by a certified public accountant, that the PJ may require with respect to the development of the project.
- 4) Costs to provide information services such as affirmative marketing and fair housing information to prospective homeowners and tenants as required by §92.351.

- 5) For new construction or rehabilitation, the cost of funding an initial operating deficit reserve, which is a reserve to meet any shortfall in project income during the period of project rent-up (not to exceed 18 months) and which may only be used to pay project operating expenses, scheduled payments to a replacement reserve, and debt service. Any HOME funds placed in an operating deficit reserve that remain unexpended after the period of project rent-up may be retained for project reserves if permitted by the PJ.
- 6) Staff and overhead costs of the PJ directly related to carrying out the project, such as work specification preparation, loan processing inspections, and other services related to assisting potential owners, tenants, and homebuyers, e.g., housing counseling, may be charged to project costs only if the project is funded and the individual becomes the owner or tenant of the HOME-assisted project. For multi-unit projects, such costs must be allocated among HOME-assisted units in a reasonable manner and documented. Although these costs may be charged as project costs, these costs (except housing counseling) cannot be charged to or paid by low-income families.
- 7) For both new construction and rehabilitation, costs for the payment of impact fees that are charged for all projects within a jurisdiction.
- 8) Costs of environmental review and release of funds in accordance with 24 CFR part 58 which are directly related to the project.

(e) Community Housing Development Organization (CHDO) costs. Eligible costs of project-specific assistance are set forth in §92.301.

(f) Relocation costs. The cost of relocation payments and other relocation assistance to persons displaced by the project are eligible costs.

- 1) Relocation payments include replacement housing payments, payments for moving expenses, and payment for reasonable out-of-pocket costs incurred in the temporary relocation of persons.
- 2) Other relocation assistance means staff and overhead costs directly related to providing advisor and other relocation services to persons displaced by the project, including timely written notices to occupants, referrals to comparable and suitable replacement property, property inspections, counseling, and other assistance necessary to minimize hardship.

(g) Costs relating to payment of loans. If the HOME funds are not used to directly pay a cost specified in this section but are used to pay off a construction loan, bridge financing loan, or guaranteed loan, the payment of principal and interest for such loan is an eligible cost only if:

- 1) The loan was used for eligible costs specified in this section, and
- 2) The HOME assistance is part of the original financing for the project and the project meets the requirements of this part.

PROHIBITED ACTIVITIES AND COSTS [§92.214]

- a) HOME funds may not be used to:

- 1) Provide project reserve accounts, except as provided in §92.206(d)(5), or operating subsidies;
- 2) Provide tenant-based rental assistance for the special purposes of the existing section 8 program, in accordance with section 212(d) of the Act;
- 3) Provide non-federal matching contributions required under any other federal program;
- 4) Provide assistance for uses authorized under section 9 of the 1937 Act (Public Housing Capital and Operating Funds);
- 5) Provide assistance to eligible low-income housing under 24 CFR part 248 (Prepayment of Low Income Housing Mortgages), except that assistance may be provided to priority purchases as defined in 24 CFR 248.101;
- 6) Provide assistance (other than TBRA, assistance to a homebuyer to acquire housing previously assisted with HOME funds, or assistance to preserve affordability of homeownership housing in accordance with §92.254(a)(9) to a project previously assisted with HOME funds during the period of affordability established by the PJ in the written agreement under §92.504. However, additional HOME funds may be committed to a project for up to one year after project completion (see §92.502), but the amount of HOME funds in the project may not exceed the maximum per-unit subsidy amount established under §92.250.
- 7) Pay for the acquisition of property owned by the PJ, except for property acquired by the PJ with HOME funds, or property acquired in anticipation of carrying out a HOME project; or
- 8) Pay delinquent taxes, fees or charges on properties to be assisted with HOME funds;
- 9) Pay for any cost that is not eligible under §§92.206 and 92.209.

(b)

(1) PJs may not charge (and must prohibit State recipients, subrecipients, and CHDOs from charging) servicing, origination, or other fees for the purpose of covering cost of administering the HOME program (e.g., fees on low-income families for construction management or for inspections for compliance with property standards) (see §92.207) except that:

- i. PJs and State recipients may charge owners of rental projects reasonable annual fees for compliance monitoring during the period of affordability. The fees must be based upon the average actual cost of performing the monitoring of HOME-assisted rental projects. The basis for determining the amount of for the fee amount must be documented and the fee must be included in the costs of the project as part of the project underwriting;

- ii. PJs, subrecipients and State recipients may charge nominal application fees (although these fees are not an eligible HOME cost) to project owners to discourage frivolous applications. The amount of application fees must be appropriate to the type of application and may not create an undue impediment to a low-income family's, subrecipient's, State recipient's, or other entity's participation in the PJ's program; and
- iii. PJs, subrecipients and State recipients may charge homebuyers a fee for housing counseling.

(2) All fees charged under paragraph (b)(1) of this section are applicable credits under 2 CFR 200.406.

(3) The PJ must prohibit project owners from charging fees that are not customarily charged in rental housing (e.g., laundry room access fees), except that rental project owners may charge.

- i. Reasonable application fees to prospective tenants;
- ii. Parking fees to tenants only if such fees are customary for rental housing projects in the neighborhood; and
- iii. Fees for services such as bus transportation or meals, as long as the services are voluntary and fees are charged for services provided.

UNIFORM PHYSICAL CONDITION STANDARDS FOR MF – REHABILITATION

HUD housing must be decent, safe, sanitary and in good repair. Prior to providing HOME funds to an eligible Multi-family affordable housing project, CDD staff will make a complete inspection of the project using the following protocol in conjunction with the Subrecipients independent Capital Needs Assessment.

Subrecipients must maintain such housing in a manner that meets the physical condition standards set forth in this section in order to be considered decent, safe, sanitary, and in good repair. These standards address the major areas of the housing: the site; the building exterior; the building systems; the dwelling units; the common areas; and health and safety considerations.

- a) *Site*. The site components, such as fencing and retaining walls, grounds, lighting, mailboxes/project signs, parking lots/driveways, play areas and equipment, refuse disposal, roads, storm drainage and walkways must be free of health and safety hazards and be in good repair. The site must not be subject to material adverse conditions, such as abandoned vehicles, dangerous walks or steps, poor drainage, sewer hazards, excess accumulations of trash, vermin or rodent infestations or fire hazards.
- b) *Building exterior*. Each building on the site must be structurally sound, secure, habitable, and in good repair. Each building's doors, fire escapes, foundations, lighting, roofs, walls, and windows, where applicable, must be free of health and safety hazards, operable, and in good repair.

c) *Building systems.* Each building's domestic water, electrical system, elevators, emergency power, fire protection, HVAC, and sanitary system must be free of health and safety hazards, functionally adequate, operable, and in good repair.

d) *Dwelling units.*

- 1) Each dwelling unit within a building must be structurally sound, habitable, and in good repair. All areas and aspects of the dwelling unit (for example, the unit's bathroom, call-for-aid (if applicable, ceiling, doors, electrical systems, floors, water heater, HVAC (where individual units are provided), kitchen, lighting, outlets/switches, patio/porch/balcony, smoke detectors, stairs, walls and windows) must be free of health and safety hazards, functionally adequate, operable, and in good repair.
- 2) Where applicable, the dwelling unit must have hot and cold running water, including an adequate source of potable water (note for example that single room occupancy units need not contain water facilities).
- 3) If the dwelling unit includes its own sanitary facility, it must be in proper operating condition, usable in privacy, and adequate for personal hygiene and the disposal of human waste.
- 4) The dwelling unit must include at least one battery-operated or hardwired smoke detector, in proper working condition, on each level of the unit.

e) *Common areas.* The common areas must be structurally sound, secure, and functionally adequate for the purposes intended. The basement/garage/carport, restrooms, closets, utility, mechanical, community rooms, day care, halls/corridors, stairs, kitchens, laundry rooms, office, porch, patio, balcony, and trash collection areas, of applicable, must be free of health and safety hazards, operable, and in good repair. All common area ceilings, doors, floors, HAC, lighting, outlets/switches, smoke detectors, stairs, walls, and windows, to the extent applicable, must be free of health and safety hazards, operable, and in good repair.

(f) *Health and safety concerns.* All areas and components of the housing must be free of health and safety hazards. These areas include, but are not limited to, air quality, electrical hazards, elevators, emergency/fire exits, flammable materials, garbage and debris, handrail hazards, infestation, and lead-based paint. For example, the buildings must have fire exits that are not blocked and have hand rails that are undamaged and have no other observable deficiencies. The housing must have no evidence of infestation by rats, mice, bedbugs, or other vermin, or of garbage and debris. The housing must have not evidence of electrical hazards, natural hazards, or fire hazards. The dwelling units and common areas must have proper ventilation and be free of mold, odor (e.g., propane, natural gas, methane gas), or other observable deficiencies. The housing must comply with all requirements related to the evaluation and reduction of lead-based paint hazards and have available proper certifications of such (see 24 CFR part 35).

(g) *Compliance with State and local codes.* The physical condition standard in this section do not supersede or pre-empt State and local codes.

Rehabilitation projects. All rehabilitation that is performed using HOME funds must meet the following requirements of this paragraph.

(1) *Rehabilitation standards.* The participating jurisdiction must establish rehabilitation standards for all HOME- assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The participating jurisdiction'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 rehabilitation standards must address each of the following:

(i) *Health and safety.* The participating jurisdiction's standards must identify life-threatening deficiencies that must be addressed immediately if the housing is occupied.

(ii) *Major systems.* Major systems are: structural support; roofing; cladding and weatherproofing (e.g., windows, doors, siding, gutters); plumbing; electrical; and heating, ventilation, and air conditioning. For rental housing, the participating jurisdiction's standards must require the participating jurisdiction to estimate (based on age and condition) the remaining useful life of these systems, upon project completion of each major systems. For multifamily housing projects of 26 units or more, the participating jurisdiction's standards must require the participating jurisdiction to determine the useful life of major systems through a capital needs assessment of the project. For rental housing, if the remaining useful life of one or more major system is less than the applicable period of affordability, the participating jurisdiction's standards must require the participating jurisdiction to ensure that a replacement reserve is established and monthly payments are made to the reserve that are adequate to repair or replace the systems as needed. For homeownership housing, the participating jurisdiction's standards must require, upon project completion, each of the major systems to have a remaining useful life for a minimum of 5 years or for such longer period specified by the participating jurisdiction, or the major systems must be rehabilitated or replaced as part of the rehabilitation work.

(iii) *Lead-based paint.* The participating jurisdiction's standards must require the housing to meet the lead-based paint requirements at 24 CFR part 35.

(iv) *Accessibility.* The participating jurisdiction's standards must require the housing to meet the 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 12131-12189) implemented at 28 CFR parts 35 and 36, as applicable. Covered multifamily dwellings, as defined at 24 CFR 100.201, must also meet the design and construction requirements at 24 CFR 100.205, which implements the Fair Housing Act (42 U.S.C. 3601- 3619 3601-3619). Rehabilitation may include improvements that are not required by regulation or statute that permit use by a person with disabilities.

(v) [Reserved]

(vi) *Disaster mitigation.* Where relevant, the participating jurisdiction's standards must require the housing to be improved to mitigate the impact of potential disasters (e.g., earthquake, hurricanes, flooding, and wildfires) in accordance with State and local codes, ordinances, and requirements.

(vii) *State and local codes, ordinances, and zoning requirements.* The participating jurisdiction's standards must require the housing to meet all applicable State and local codes, ordinances, and requirements or, in the absence of a State or local building code, the International Existing Building Code of the International Code Council.

(viii) *Uniform Physical Condition Standards.* The standards of the participating jurisdiction must be such that, upon completion, the HOME-assisted project and units will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703. HUD will establish the minimum deficiencies that must be corrected under the participating jurisdiction's rehabilitation standards based on inspectable items and inspected areas from HUD-prescribed physical inspection procedures (Uniform Physical Conditions Standards) pursuant to 24 CFR 5.705.

(ix) *Capital Needs Assessments.* For multifamily rental housing projects of 26 or more total units, the participating jurisdiction must determine all work that will be performed in the rehabilitation of the housing and the long-term physical needs of the project through a capital needs assessment of the project.

(x) *Broadband infrastructure.* For new commitments made after January 19, 2017 for a substantial rehabilitation project of a building with more than 4 rental units, any substantial rehabilitation, as defined in 24 CFR 5.100, must provide for installation of broadband infrastructure, as this term is also defined in 24 CFR 5.100, except where the participating jurisdiction determines and, in accordance with § 92.508(a)(3)(iv), documents the determination that:

- (A) The location of the substantial rehabilitation makes installation of broadband infrastructure infeasible;
- (B) The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden; or
- (C) The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

PROPERTY STANDARDS FOR NEW CONSTRUCTION [§92.251]

(a) *New construction projects.*

- 1) State and local codes, ordinances, and zoning requirements. Housing that is newly constructed with HOME funds must meet all applicable State and local codes, ordinances, and zoning requirements. HOME-assisted new construction projects must meet State or local residential and building codes, as applicable or, in the absence of a State or local building code, the International Residential Code or International Building Code (as applicable to the type of housing) of the International Code Council. The housing must meet the applicable requirements upon completion.
- 2) *HUD requirements.* All new construction projects must also meet the requirements described in this paragraph:
 - (i) *Accessibility.* The housing must meet the accessibility requirements of 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 12131- 12189) implemented at 28 CFR parts 35 and 36, as applicable. Covered multifamily dwellings, as defined at 24 CFR 100.201, must also meet the design and construction requirements at 24 CFR 100.205, which implements the Fair Housing Act (42 U.S.C. 3601- 3619 3601-3619).
 - (ii) [Reserved]

(iii) *Disaster mitigation.* Where relevant, the housing must be constructed to mitigate the impact of potential disasters (e.g., earthquakes, hurricanes, flooding, and wildfires), in accordance with State and local codes, ordinances, or other State and local requirements, or such other requirements as HUD may establish.

(iv) *Written cost estimates, construction contracts and construction documents.* The participating jurisdiction must ensure the construction contract(s) and construction documents describe the work to be undertaken in adequate detail so that inspections can be conducted. The participating jurisdiction must review and approve written cost estimates for construction and determining that costs are reasonable.

(v) *Construction progress inspections.* The participating jurisdiction must conduct progress and final inspections of construction to ensure that work is done in accordance with the applicable codes, the construction contract, and construction documents.

(vi) *Broadband infrastructure.* For new commitments made after January 19, 2017 for a new construction housing project of a building with more than 4 rental units, the construction must include installation of broadband infrastructure, as this term is defined in 24 CFR 5.100, except where the participating jurisdiction determines and, in accordance with § 92.508(a)(3)(iv), documents the determination that:

(A) The location of the new construction makes installation of broadband infrastructure infeasible; or

(B) The cost of installing the infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden.



City of Aurora
Community Development Division
Single Family Rehabilitation Program
Program Policies and Procedures

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TAB 1

**City of Aurora
Community Development Division
HOME Single Family Rehabilitation Program**

Program Description

Statement of Purpose

The City of Aurora, Neighborhood Services Department, Community Development Division, through the Housing Rehabilitation Program, shall use federal funds from the HOME Program for loans and/or grants to rehabilitate single family, owner-occupied dwellings and to assist certified non-profit housing providers to provide housing units for eventual ownership by low- and moderate income families and described herein.

The intent of the rehabilitation program is to improve the supply of decent, safe, sanitary and affordable housing for low- and moderate income *families and individuals in Aurora to enhance the stability and standard of living in existing Aurora neighborhoods and the community at large.

*An objective of the HOME Program according to federal regulations

HOME Program regulatory limits for use of funds as applicable to the Homeowner Rehabilitation Projects

- Property owners must occupy the property as their principle residence and qualify as low- and moderate income at the time HOME assistance is committed to the project.
- Applicants who own multiple residential properties are not eligible to apply to the SFR program until other properties have been liquidated (as recommend by Velma Simpson, former CPD Representative from HUD).
- Property owners are eligible for participate in the HOME Single Family Rehabilitation Program one time only per applicant (not property).
Example: John Smith, who owns and resides at the property located at 123 Hiccup Avenue, Aurora, Colorado 80010, applies and is approved to participate in the HOME SFR program. After completion of the rehabilitation on the home, John Smith sells the property and repays the SFR loan and purchases another property at 888 Cherry Creek Dr., Aurora, CO 80017. Although Johns Smith’s household income remains eligible under the program guidelines, he is not eligible to participate in the HOME SFR program for the new residence.

However, the new owner of 123 Hiccup Avenue may make application to the HOME SFR program and participate if the new household meets all the program guidelines and income limits.

- Annual gross income of the household cannot exceed 80% of the median income limits * as established by HUD for the area and adjust to household size.
* HUD established household income limits may change without notice.
- Household income summaries must be completed at the initial occupancy or when HOME assistance is provided. **NOTE:** Household income will be updated every six (6) months from application until loans funds have been committed (loan signed with homeowner).
- The minimum level of HOME funds is \$1,000 per project (unit). Upon completion, rehabilitated housing must, at a minimum:
 - Address Health and Safety,
 - Energy Efficiency,
 - Code Violations or potential Code Violations,
 - Meet State or local codes, ordinances, requirements, or
 - Ensure all major systems (Windows, Furnace, Water Heater, sewer line, and Roofing) have a useful life of at least 5 years,
 - Absent such Codes, International Existing Building Code, **and**
 - Be free of deficiencies selected by HUD from the list of Uniform Physical Condition Standards (effective 01/24/2015) as of Jan. 2016 this list has not been selected by HUD; we continue to use our established written rehabilitation standards that address all areas of health and safety.
- All properties built prior to 1978 must comply with the Lead Based paint Regulations as established by HUD and in compliance with the Environmental Protection Agency (EPA).
- The homeowner must carry a current Homeowner's Property Insurance Policy at the time of loan closing. The City of Aurora, Community Development Division Rehab Program shall be named as an additional insured (2nd mortgage) for the life of the loan.
- Eligible expenditures are limited to rehabilitation construction (hard costs) which may include site improvement, utility connections and demolition, and reasonable and necessary soft costs such as testing, appraisal fees, legal fees, recording fees, etc.)
- Any debt secured against the property such as 1st mortgage, 2nd mortgage, etc. must be in good standing for a minimum of twelve (12) consecutive months.
- The following stipulations apply to:

- **Reverse Mortgages** – homeowner’s who have Reverse Mortgage are not eligible for the Single Family Rehabilitation Loan Program (effective 08/11/2012);
- **Loan Modifications** – Homeowner’s who have been approved and the modification has been accepted, must demonstrate a twelve (12) month regular payment history (outside of the 3 month trial period) in accordance with the loan modification prior to participating in the SFR Program;
- **EHLP Participant’s**- Homeowner’s who have been approved and are currently under the EHLP program must complete the two (2) years of reduced mortgage payment agreement and must demonstrate a twelve (12) month payment history at full mortgage payments prior to participating in the SFR Program (effective 11-13-2012);
- **Bankruptcy** – Any bankruptcy must be fully Discharged. Homeowner must provide a twelve month payment history from the lender prior to making application to the SFR Program.
- **Judgments** – All judgments or liens (other than mortgages) secured against the property must be cleared from their record and released through county/court records prior to participating in the SFR Program. Documented proof from the court/county records will be required to substantiate the release of such judgments/liens.
- **Child Support** – Any Homeowner court ordered to pay child support must be current in order to participate in the SFR program. Child Support payments will be verified through Trans Union Credit Reporting Agency.
- **Previous Handicap Accessibility Grant Program Participant** – As of 03.01.2019, there will be a 5 year wait period from date of final completion of the HAP project to being eligible to apply for the Single Family Rehabilitation program. Any exceptions must be approved in writing by the CD Manager.
- **Value Limits** – After rehabilitation value limits must not exceed the HUD established value limits per county. County property assessments will be utilized to establish “before rehabilitation” value limits and proposed estimated rehabilitation costs will be added to determine “after rehabilitation” value limits.
Example: County assessment prior to rehabilitation is \$260,000, proposed rehabilitation costs shall not exceed \$52,000; therefore the after rehabilitation value limit will not exceed \$312,000. *Current 2018 MSA limits for Adam and Arapahoe counties as established by HUD are set at \$312,000 (effective April 1, 2018).

*HUD established value limits may change without notice.

Any exceptions to the above and following policies and procedures must be approved in writing by the Rehab Supervisor and/or Community Development Division Manager (CD Manager).

TAB 2

Current Income Limits and Established Value Limits

INSERT LIMITS HERE

TAB 3

Ways and Means of Assistance

Technical Assistance – Shall be provided by the program staff to the homeowner for such assistance including but not limited to property inspections, written work descriptions, bid procurement, contract administration, funds disbursement, construction inspections and project close-out.

Financial Assistance – Using HOME funds to cover the cost of the rehabilitation shall be as follows:

- **Deferred Loans:**
 - Household income limits must not exceed income eligibility requirements as established by HUD;
 - Property must be owner-occupied for the life of the loan;
 - Terms: *0% Interest, Deferred
- *Interest on the loans may change without notice.
- **Repayment is due in full whenever one or more of the follow occurs:**
 - Upon sale, transfer or conveyance of the secured property, by any means or for any reason whatsoever;
 - Refinance of existing first mortgage that results in a cash out of equity;
 - Borrower’s failure or refusal to maintain the secured property in accordance with the Land Use and Housing Codes and Ordinances pursuant to the City of Aurora and or the State of Colorado.
 - Borrower ceases to reside as a primary resident at the secured property.

Note: Depending on the housing market, immediate sale of the property may not be in the best interest of the City, therefore the CD Manager may agree to modify the loan.

Note: In extreme hardship cases, the homeowner may request that all or part of the loan be forgiven. The CD Manager has authority to make the decision based on documented information provided by the borrower.

- **Allowable Grants** – HOME funds may be used in the form of a grant in conjunction with the above rehabilitation loans and can be made a part of the full rehabilitation project so long as those costs are reasonable and necessary expenditures related to the rehabilitation and provided those expenditures are for:

Professional Services not limited to Lead Based paint Hazard, Asbestos, Radon, and Mold

- Assessment through testing
- Mitigation through scope of work
- Clearance through testing
- Voluntary Relocation fees

- Excessive fees to complete scope of work as determined by the State of Colorado Historic Society (SHPO)
- **Soft Costs** – HOME funds may be used in the form of program costs to cover the costs not limited to:
 - Recording fees;
 - Legal fees;
 - Misc. fees
- **Hidden Conditions** – Hidden conditions can include unforeseen repairs that require additional work where loan funds have been exhausted and the cost to mitigate such conditions may be provided in the form of a loan or a grant to the owner of the property. The Rehabilitation Programs Supervisor has the authority to increase the loan and/or approve a grant for the additional cost of the corrections. Decisions will be made on a case by case basis.

NOTE: The Rehab Supervisor has the authority to approve project grants in excess of the original loan when the repairs are for the immediate safety of the occupant and address health and safety or code items. It is not the intent of this program to charge the owner(s) for hidden repairs whenever possible. Grants will be approved on a case by case basis.

HOME Limitations – HOME program funds expended shall be applied in such a manner so that at the completion of the rehabilitation on the project, the property shall meet the established rehabilitation standards and shall be in compliance with all applicable Aurora Building Codes and Ordinances as adopted by and amended by the City of Aurora. Priority of completed rehabilitation work shall be in accordance with the approved Rehabilitation Property Standards as summarized herein below:

- Address Health and Safety,
- Energy Efficiency,
- Code Violations or potential Code Violations,
- Meet State or local codes, ordinances, requirements and be free of deficiencies selected by HUD from the list of Uniform Physical Condition Standards (effective 01/24/2015)
- Ensure all major systems (Windows, Doors, Furnace, Water Heater, Electrical, Plumbing, Sewer, Roofing and Gutters) have a useful life of at least 5 years at completion of rehabilitation of the home.

NOTE: Mobile and manufactured homes that are not on a permanent foundation are not eligible under the SFR program for rehabilitation per HOME regulations. All mobile and manufactured home inquiries will be forwarded to the Emergency Repair Program and repairs will be limited to the program guidelines.

NOTE: In compliance with the Single Family Rehabilitation Program policies and procedures, the program **PROHIBITS** projects to be completed under a Self-Help type of agreement. All projects under SFR program must be competitively bid and award to the lowest responsible/responsive bidder. All contracts will be awarded to an Independent, Licensed and Insured General Contractor or in special cases to a specialty Sub-Contractor.

Ineligible Uses – In accordance with established policies and procedures, major structural repairs are not eligible repairs under the Single Family Rehabilitation Program. Such repairs include but are not limited to structural defects or deterioration of foundations and/or slabs. While such defects are hazardous, the program cannot guarantee that type of repair; therefore applicants with major defects pertaining to structural corrections will not be eligible for the SFR program until they have addressed the major defects on their own. (Effective May 2012)

TAB 4

Procedure Manual

Step-by-Step Description of Procedures for the Single Family Rehabilitation Program

Procedure SFR – 1

Submission of Application

Summary: Application procedure for the SFR Program

Position: Rehab Specialist, Rehab Supervisor

Action:

- Applicant contact the Community Development Division office and requests information on the SFR program.
- Rehab staff provides the applicant with the descriptive information of the program including but not limited to proof of ownership, household size, household income, etc. Staff will make a preliminary eligibility determination based on the information received from the applicant prior to providing the applicant with a program application.
- Rehab staff shall mail/e-mail/fax the application package to the interested applicant. The following documents must be submitted with the application in order to be considered for the SFR program:
 - Completed Application, filled out and signed by all parties on title to the property;
 - Submission of Proof of Ownership which will include but not be limited to:
 - Copy of most Current Mortgage Statement;
 - Copy of recorded Warranty Deed;
 - Current copy of recorded Deed of Trust;
 - Proof of Household Income to include but not be limited to the following:
 - Most Current three (3) months of consecutive paystubs from all household members who are 18 years of age or older;
 - Most Current three (3) months of bank and/or saving accounts from all household members who are 18 years of age or older;
 - Most Current copies of last three (3) years of Federal Tax Returns for all household member who are 18 years of age older;
 - Current years Benefit Statement for:
 - Social Security Administration Retirement Benefits (SSA)
 - Social Security Disability Benefits (SSI)
 - Retirement/pension/annuity Benefits
 - Other monthly income
 - Current copy of Workers Compensation Benefit
 - Current copy of Unemployment Benefit

- Proof of current Homeowner’s Property Insurance;
- Completion of the Supplemental Income Questionnaire;
- Copy of current Colorado Identification for all household members who are 18 years of age or older, including but not limited to the following:
 - Current Colorado Driver’s License
 - Current Colorado Identification
 - Current United States Passport
- Signed Residency Affidavit from all household members who are 18 years of age or older;
- Signed Marijuana Affidavit from all household members who are 18 years of age or older;
- Copy of Current years Student Identification for all household members who are 18 years of age or older who do not have an income;
- If a Single Parent, provide copy of the recorded Divorce Decree including but not limited to the Parenting Plan, Child Support and Maintenance.

Summary: Procedures used to review the application and applicant’s eligibility for participation in the SFR Program

Position: Rehab Specialist, Rehab Supervisor, CD Manager

Action:

- Rehab staff shall review applications for completeness of documentation and attachments, then forward the package to the Rehabilitation Programs Supervisor for processing.
- Rehab Supervisor or designated staff shall process the completed application as follows:
 - Ensure all signatures have been obtained and information is complete on the application
 - Order and Obtain the Ownership and Encumbrance Report from the Rehab Supervisor (or designated staff member). Review O&E for any title discrepancies, liens, and/or judgments.
 - Obtain a credit report from the Rehab Supervisor (or designated staff member) for all persons on title to the property. Review the credit report for judgments, liens, bankruptcies, foreclosures, child support payments, and other negative impacts on the applicant’s credit.
 - Prepare the Household Income Summary.
 - Development a project file.
 - Prepare the Manager’s Decision Memo, submit entire project file to the CD Manager for review and final decision.
If the application is approved, return project file to the Rehab Supervisor and proceed to the next step.
 - Assigned Rehab Specialist shall input the project file information into the current rehab data base, place the approved project on the current wait list and proceed to the environmental review process.
 - If the application is denied, return the project file to the Rehab Supervisor or designated staff to notify the applicant of the denial to participate. Denial letter will identify the reason for denial and notify applicant of their right to appeal under the established Rehabilitation Appeals Policy.

Summary: Procedure for obtaining the environmental review using the Site Specific Summary

Position: Rehab Supervisor, Designated CD Staff

Action: For Projects 50 years or older

- Rehab Supervisor shall prepare the following and submit to the designated CD staff member for processing:
 - Prepare the Site Specific Form with appropriate information;
 - Prepare a memorandum identifying the proposed scope of work;
 - Attach the appropriate County (Arapahoe or Adams) Assessment
- Designated CD staff will complete the environmental review process including but not limited to the following:
 - Take appropriate site pictures of the project
 - Submit the Environmental Package to the designated Certified Local Government (CLG) for processing the architectural review and local recommendations (if any) back to the CD staff member to forward to the State Historic Preservation Office (SHPO) for final review and determination.
 - Upon final review from SHPO, environmental review will be placed in project file and recommendations shall be incorporated into the final description of work.
 - Assessment of Noise Determination, if applicable;
 - Assessment of Hazardous Waste, if applicable
 - Flood determination

Actions: For Projects < 50 years old

- Designated CD staff will complete the environmental review process including but not limited to the following:
 - Assessment of Noise Determination, if applicable;
 - Assessment of Hazardous Waste, if applicable
 - Flood Determination
- The final Site Specific Checklist will be placed in the project file.

Summary: Procedure for initiating and performing the home inspection to determine property eligibility and rehabilitation needs.

Position: Rehab Specialist, Rehab Supervisor

Action:

- Rehab Supervisor or designated staff will place all approved projects on the waitlist in the order they were received/approved.
- Rehab Specialist shall be assigned each project in the order on the waitlist. Once assigned the project file will be given to the Rehab Specialist. The Rehab Specialist shall review all notes in the file, if any, including but not limited to the “before” assessed value limits, SHPO requirements, type of work requested by the applicant, etc.
- Rehab Specialist shall contact the homeowner, scheduling the initial property inspection. All inspections will be documented on the Inspection Check List form and placed in the project file.

Properties Built Prior to 1978

- Rehab Specialist shall perform the home interview with the homeowner regarding the possible existence of Lead Base Paint Hazards (LBPH) existing in the home. The homeowner must agree to allow all testing and necessary treatment or the project cannot move forward.
- Rehab Specialist shall provide the homeowner with the notification of Lead Based Paint pamphlet and obtain their signature on the notification form for the file.
- Rehab Specialist shall inspect the property for any possible LBPH in the property. The inspection for LBPH is performed by a Colorado Certified Lead Inspector/Risk Assessor. All testing, results and recommendations by the Lead Inspector/Assessor will be documented in the project file.
NOTE: the property inspection checklist is consistent with HUD’s Final Rule, 24 CFR Part 35, “Requirements of Notification, Evaluation and Reduction of LBPH in Federally owned Residential Property and Housing receiving Federal Assistance”, (effective 09/15/2000).

- Rehab Specialist shall incorporate the recommendation/requirements from the LBPH assessment into the projects Scope of Work. The Assessment regarding possible LBPH in the property are based on any of the following:
 - Visual LBPH Inspection Report;
 - Laboratory sample sheet for samples submitted to the qualified lab;
 - Laboratory sample results; and
 - Written Risk Assessment

Required on All Properties

- Rehab Specialist shall perform a complete site inspection of the property using the Property Inspection Checklist, noting any violations of the established rehabilitation standards, city codes and ordinances, health and safety concerns, and energy efficiency issues on the form. The Property Inspection Checklist will generate the required property improvements/corrections in accordance to the following program priorities:
 - Health and Safety concerns, including but not limited to LBPH, Mold, Radon and Asbestos;
 - Energy Efficiency concerns, including but not limited to windows, doors, insulation, HVAC, etc.;
 - City Code Violations or possible violations, including but not limited to trip hazards in concrete, roofing, siding, etc.;
 - Inspection of all major systems (Windows, Doors, Furnace, Water Heater, Electrical, Plumbing, Sewer, Roofing and Gutters) have a useful life of at least 5 years or will be replaced during the rehabilitation of the project;
 - Effective 01/24/2015, based on deficiencies selected by HUD from the list of Uniform Physical Conditions Standards. The UPCS- comprehensive listing from HUD is less informative and less detailed than the current Property Inspection Checklist used by the Rehab Staff; therefore the City of Aurora Community Development Rehabilitation Staff have opted to use the Property Inspection Checklist which is more restrictive than the UPCS Listing. There is no rating is no rating 1, 2, 3 on deficiencies. Items are noted in good condition or repair/replacement required
 - Where applicable, Community Development shall follow all required HOA review procedures and place approval or waiver documents in Project File.

Summary: Procedures for completing the Scope of Work, project estimate and owner approval for proposed rehabilitation of the property

Position: Rehab Specialist, Rehab Supervisor

Action:

- Rehab Specialist shall prepare a detailed scope of work, including but not limited to type of product and specifications of materials to complete the rehabilitation of the property. The Scope of Work shall be based on the initial inspection and testing results and recommendations as noted on the Property Inspection Checklist and documented in the project file. If the property has been identified with possible LBPH, the scope of work shall identify such hazards and the treatment required under state and federal regulations.
NOTE: For reporting reasons, any project identified with possible LBPH will have a scope of work broken into two parts:
 - Section One of the scope of work shall contain all itemized and estimated costs associated with the rehabilitation work related to identified program priorities (most if not all of these costs will be part of the rehabilitation loan provided to the homeowner);
 - Section Two of the scope of work shall contain all itemized and estimated costs directly related to the reduction of LBPH existing on the property and any work that could cause a LBPH to exist. Section Two will be provided to the homeowner in the form of a grant.
- Rehab Specialist shall submit both Section One and Section Two of the proposed scope of work and cost estimate to the Rehab Supervisor for review and approval. The Rehab Supervisor shall review the scope of work based on established program priorities.
- Rehab Supervisor shall review the scope of work based on established program priorities. Rehab Supervisor will note any questions, edits, corrections deletions, etc. on the scope of work, then initial and date the form, documenting the review.
- Rehab Specialist shall review the established scope of work/cost estimate with the homeowner, making any necessary corrections, additions, etc. in accordance with program priorities. Homeowner must sign off on the scope of work in order for the project to move to the procurement process.
- Rehab Specialist shall place the signed scope of work into the project file and move to the procurement process.

Summary: Procedure to assist the homeowner with obtaining reasonable and responsible bids from qualified General Contractors

Position: Rehab Specialist, Rehab Supervisor, Financial Analyst

Action:

- Prior to bidding the project, if the initial income summary is over six (6) months old from original approval, the Rehab Specialist will prepare an updated income summary on the household using the most current household income limits provided by HUD and submit it the new income summary to the Rehab Supervisor for final determination and approval.
- Rehab Specialist shall contact homeowner to select a day and time to perform the bid walk through with Licensed General Contractors.
NOTE: A pre-qualified list of Licensed, General Contractors has been developed over the last 24+ years and is continuously updated as new contractors apply and other contractor leave.
- Rehab Specialist shall prepare the following Bid Package for the project, which will include but not be limited to the following:
 - Invitation to Bid
 - Bid package to include the scope of work
 - Certification of Section 3 status
 - Instruction to Bidders, if necessary
 - General Conditions, if necessary
 - Contractor Reference form
 - Insurance Requirements
- Rehab Specialist shall utilize the established General Contractor’s Bid list for the solicitation of bids for the project. Any General Contractor that has more than three active rehabs awarded at one given time will not be asked to attend a bid walk through. Any General Contractor who is in violation of the terms of their contract on any CDBG or HOME funded project will not be invited to bid until the project in question has been completed and signed off by the Rehab Specialist.
NOTE: Exceptions to this step shall be based on a contractor’s prior work history and their capacity to fund a project; For instance, some contractor’s may be limited to less than three (3) projects based on their prior work history and capacity to fund a project in whole.

- Any General Contractor interested in bidding the Single Family Rehabilitation Program projects must be pre-approved prior to the scheduled bid open. To become a qualified Contractor the General Contractor must provide the following Contractor information:
 - Completed General Contractor's Application with all attachments;
 - Have a DUN's Number and be registered in the System for Award Management (SAM) or be in the process of registering and/or renewing;Rehab staff will review application and attachments, call credit references, check BBB rating and verify professional references. If the Contractor is approved for the program, their name and contact number will be placed on the active General Contractor's List.
- Rehab Specialist will provide a copy of the invitation to bid to a minimum of three (3) or more General Contractor's from the established bid list. General Contractor's not on the bid list will be allowed to bid the project, however for their bid to be consider they will need to have submitted their contractor application and references to the rehab staff prior to the bid opening.
NOTE: Bid award will be awarded to only General Contractors who have been pre-qualified prior to bid opening.
- Rehab Specialist shall distribute the bid packages from the Office of Community Development. All Contractor's interested in bidding the project shall sign for and acknowledge receipt of the bid package using the established Bid Sign-out Sheet. Due to the detailed scope of work for the SFR programs, all bid walk-throughs must be attended by the General Contractor or representative from that company. Attendance is mandated under the program for the Contractor's bid to be considered. The instruction to bidders identify that on projects that exceed \$100,000, there is a mandated requirement for a Payment and Performance Bond.
- Rehab Specialist shall meet the GC's at the project site, per the specified date/time as indicated on the Invitation to Bid. All GC's or GC's representatives shall sign the Bid Attendance for prior to walking the project.
- Rehab Specialist shall prepare a Bid Addendum for any changes, additions, and/or work clarifications to the bid document prior to the bid opening date. The Rehab Specialist shall distribute the Bid Addendum (if applicable) to all GC's that attended the mandatory bid walk-through.
- Each GC bidding the project shall place their sealed bid in the Locked Bid Box established by CD. For their convenience a date and time stamp machine has been placed next to the bid box and they are highly encouraged to use this prior to placing their bid in the locked bid box. All bids will be opened at the designated day and time per the invitation to bid. Late bids will not be considered.

- Rehab Specialist shall verify all bids for accuracy and fairness. Verifications include that all items were bid in accordance with the bid documents, calculations are correct, references have been provided and all documents requiring signatures and acknowledgment have been obtained.
- Rehab Specialist shall complete the Bid Analysis on the project and provide a copy of the final Bid Abstract to all GC's who turned in bids on the project (excluding late bids).
- Rehab Specialist shall notify any GC whose bid appears to be extremely low and give that GC a maximum time of 24 hours to review their bid and determine if they wish to continue with the project at that established price. If the GC honor's their bid, proceed to the contractor selection process. If the GC acknowledges a mistake on their bid, they have the option to withdraw their bid without penalty.

Summary: Procedure allowing the Homeowner to make an informed decision for the selection of the GC.

Position: Rehab Specialist

Action:

- Rehab Specialist shall prepare and deliver to the homeowner the Bid Procurement form. The Bid Procurement form shall provide the homeowner with all the GC's names, address, contact information, total bid amount (section one and section two) of each GC, and a minimum of three (3) references from each contractor who provided a qualified bid.

Note: Federal regulations mandate that the program can only provide funds for the lowest qualified bid received, however the homeowner may select any GC under the following guidelines:

- Select the lowest qualified bid as established on the Bid Procurement form;
 - Select a bid other than the lowest qualified bid and pay the difference between the lowest qualified bid and the bid selected;
 - Select a bid other than the lowest qualified if negative comments are given from the provided GC's references. **Note: Homeowner must provide a written statement of who was contacted, what was stated, etc., and turn into CD for review.**
- Rehab Specialist shall obtain the Bid Procurement completed and signed by the homeowner, place in the project file and move to the next procedure.
 - Prepare and process the Request for the Purchase Requisition (copy placed in the project file).

Summary: Procedure for determining the amount of financial assistance to provide for the rehabilitation of the property

Position: Rehab Specialist, Rehab Supervisor, CD Manager

Action:

- Rehab Specialist shall prepare the Loan Approval form based off of the Bid Procurement form identifying the lowest responsible bidder. The loan approval will be based off of total of section one plus a reasonable contingency. The loan approval form will identify the following:
 - Total project costs plus the county assessed tax value of the property (based off of the county assessment) shall not exceed the HUD established property values per county. Established Metropolitan Statistical Area values (Adams/Arapahoe) for 02.04.2019 is *\$342,160.
Note: Property values are established by HUD and may change more than once a year.
 - After rehabilitation estimated Loan-to-Value
- Rehab Specialist shall submit the Loan Approval form, with the project file, to the Rehab Supervisor for review, forwarding entire package to the CD Manager for final review and approval/deny of the loan. If the CD Manager signs the loan approval form, the entire package will be returned to the Rehab Specialist to proceed to the next process. If the loan is denied, the CD Manager must provide written reasoning for the denial. Rehab Supervisor will provide written denial to the homeowner which will include why the loan has been denied and explaining the process to appeal this decision.

Summary: Step to prepare for Loan closing with property Owner

Position: Rehab Specialist, Rehab Supervisor

Action:

- Rehab Specialist shall prepare the following loan documents, based on the approved loan approval:
 - Rehabilitation Loan Agreement
 - Opportunity to Rescind
 - Truth-in-Lending
 - Promissory Note
 - Deed of Trust
 - Program Participation Notice and Agreement
 - Loan –to-Value Affidavit (if loan exceeds 100%)
 - Subordination Policy Acknowledgement (if applicable)
 - Loan Set-up form
- Rehab Specialist shall submit the prepared loan documents, along with the project file, to the Rehab Supervisor for review for accuracy.
- Rehab Specialist shall schedule the loan and contract closing with the homeowner. The loan closing will take place prior to the contract closing (see procedure for contract closing).

Summary: Procedure for documentation preparation for the contract closing between the Homeowner(s) and the awarded General Contractor

Position: Rehab Specialist, Rehab Supervisor

Action:

- Rehab Specialist shall prepare the Notice of Award and issue the award via US mail and/or email to the selected General Contractor.
- Rehab Specialist shall verify all licenses and insurance are current prior to the contract closing.
- Rehab Specialist shall prepare the contract documents for the Owner/Contractor closing. The contract documents shall include but not be limited to the following:
 - Owner/Contractor Agreement total shall include both Section one and Section two amounts);
 - Independent Contractor Affidavit;
 - Contractor Immigration Affidavit
 - Exhibit A – Contract Description of Work (One for Section One and One for Section Two if applicable);
 - Obtain the Debarment Certification on the General Contractor from the SAM’s system;
 - Unsigned Lien Waiver;
 - Application and Authorization for Payment;
 - Materials Selection List;
 - Prepare and process the request for the Purchase Requisition (copy placed in project file)
- Rehab Specialist shall submit the contract documents to the Rehab Supervisor prior to the contract closing for review for accuracy.

Summary: Procedure to complete the closing with the Borrower and Co-Borrower (if applicable)

Position: Rehab Specialist, Rehab Supervisor, Administrative Technician

Action:

- Rehab Specialist shall summarize the Rehabilitation Loan Agreement with the borrower(s), answer any questions and obtain required signatures on the agreement.
- Rehab Specialist shall summarize the Notice of Opportunity to Rescind with borrower(s) and obtain required signatures on the document. **Note:** Borrower(s) shall receive two copies of this document.
- Rehab Specialist shall summarize the Truth-in-Lending with the borrower(s), answer any questions and obtain required signatures on the document.
- Rehab Specialist shall summarize the Promissory Note with the borrower(s), answer any questions and obtain required signatures on the document.
- Rehab Specialist shall summarize the Deed of Trust with the borrower(s), answer any questions and obtain required signatures on the document.
- Rehab Specialist shall obtain a current copy of the borrower(s) identification for the project file (may be the same turned in with the application).
- Rehab Specialist shall summarize the City of Aurora Participation Agreement with the borrower(s), answer any questions and obtain required signatures on the document.
- Rehab Specialist shall summarize the Loan-to-Value Affidavit, answer any questions and obtain required signatures on the document.
- Rehab Specialist shall summarize the Subordination Policy Agreement for Rehab Loan(s) to the borrower(s), answer any questions and obtain required signatures on the document.
- Rehab Specialist shall make copies of all documents. Provide the borrower(s) with a complete set of executed loan closing documents. All original documents with the exception of the Promissory Note and the Deed of Trust will be placed in the project file. Copies of the Note and Deed and Recorded Deed will be placed in project file.

- Rehab Specialist shall provide the original Promissory Note and the Deed of Trust to the designated Admin Tech for recording of the Deed of Trust with the appropriate county, after the 3-day right to rescind expires, and place both the Note and Deed in the safe. The recorded DOT will be attached to the original Note and Deed once recorded with county.

Procedure SFR – 12	Contract Closing with Contractor and Borrower(s)
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Summary: Procedure to complete the closing with the Borrower and Co-Borrower (if applicable)

Position: Rehab Specialist, Rehab Supervisor,

Note: It is required to have the completed Purchase Requisition prior to scheduling the Contract Closing.

Action:

- Rehab Specialist shall summarize the Owner/Contractor Agreement to both the Contractor and the Borrower(s), answer any questions and obtain required signatures on the document.
- Rehab Specialist shall review the Description of Work (both section one and two, if applicable), with both parties, answer any questions and obtain required initials and signatures on the document.
- Rehab Specialist shall provide the General Contractor with an unsigned Lien Waiver, Application and Authorization for Payment form and the Materials Selection form during the contract closing.
- Rehab Specialist shall obtain copies of all necessary licenses, insurance and certifications from the contractor and place in the project file.
- Rehab Specialist shall prepare and process the Notice to Proceed, aka Purchase Order after the 3-day right to rescind period has expired. In accordance with established city procurement process, a purchase order is required when the contact (section one and/or section two) exceed \$4,999. Each Purchase Order request package shall include the following:
 - Request for Notice to Proceed/Purchase Order
 - Copy of the signature page of the Purchase Requisition
 - Copy of the Executed Exhibit A – Description of Work – which exceeds \$4,999.
- Rehab Specialist shall submit the project file and the Purchase Order request to the Rehab Supervisor for review and processing. The Rehab Supervisor shall verify documentation, sign and submit the request to the Financial Analyst for processing of Purchase order.

- Financial Analyst shall complete the Purchase Order request, obtain signature from the CD Manager and forward a copy of the executed Purchase Order to the Rehab Specialist for processing to the General Contractor. Copy of the Purchase Order will be placed in the project file.

Procedure SFR – 13	Home Loan and HUD Project Set-up
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Summary: Procedure for setting up the loan in loan ledger and IDIS

Position: Rehab Supervisor, Financial Analyst

Action:

- Rehab Supervisor shall prepare the loan and Project Set-up package, which shall include the following:
 - Completed Loan Set-up form
 - Completed HUD Project Information Report
 - HUD Project Set-up form
 - HUD Project Voucher form, if applicable (ie: Initial Lead Test)
- Rehab Supervisor shall make copies of the above packet and place in the project file.
- Rehab Supervisor shall forward the Loan and Project Set-up package to the Financial Analyst for set-up in Loan Ledger and set-up in IDIS systems.
- Financial Analyst shall, in accordance with HUD/HOME and CD Program Guidelines, set-up the project in Loan Ledger and IDIS utilizing established procedures from HUD and the City of Aurora.
- Rehab Supervisor shall forward the project file to the Rehab Specialist responsible for the project management.

Summary: Procedure for overseeing the rehabilitation work / construction process and responding to Owner/Contractor Concerns

Position: Rehab Specialist, Rehab Supervisor,

Action:

- Rehab Specialist shall conduct periodic drop-by inspections; respond to questions and/or concerns by the Borrower(s) and/or Contractor during the construction process; assist in clarification of any misunderstandings of the DOW and materials specified; note any findings in the project file; communicate any concerns regarding the project to the Contractor using the Inspection Correction Notice; address specific concerns, complete with expectations relating to necessary corrections and time limits.
- If there are necessary changes to the original scope of work, the Rehab Specialist shall discuss such changes with the Borrower and the Contractor to assure that the work is eligible and necessary corrections and if there is a **need** for an extension of time to the contract.
- Rehab Specialist shall, upon receipt of the Owner/Contractor signed Change Order, process the Change Order for review/approval/denial. The Change Order package includes:
 - Change Order with original signatures from the Owner, Contractor and Rehab Specialist;
 - Copy of the Contractor's proposal;
 - Copy of the Signature page of the Purchase Requisition; and
 - Copy of the most current Purchase Order.
- Rehab Specialist shall submit the Change Order package to the Rehab Supervisor who will forward to the Financial Analyst and the CD Manager for Signature and final processing. A copy of the change order will be placed in the project file (the copy may not have all required signatures; however the approved original Change Order will be attached to the Original Purchase Order kept by the Financial Analyst).
- A copy of the revised Purchase Order will be placed in the project file.

Summary: Processing of Progress payment requests from the General Contractor

Position: Rehab Specialist, Rehab Supervisor, Financial Analyst

Action:

- Rehab Specialist, upon receipt of the completed Application and Authorization for Payment request from the Contractor, shall review for completeness and required signatures (Owner and Contractor). The Application and Authorization for Payment shall itemize percentage of work completed and total requested to be paid.
- Rehab Specialist shall inspect the work to verify it has been properly and adequately completed as applied for on the payment request and the materials meet the specification as listed in the contract documents. Any items listed on the payment request for must be 100% completed which include the sign off from the building department on items requiring a permit (such as furnace, water heater, roof, etc.). Rehab Specialist has the authority to adjust and/or reject the payment request if work is not to industry standards, use improper materials, etc. If adjustments to the payment request have been made, the contractor will receive a copy of such adjustments for their file.
- Rehab Specialist shall prepare and issue a Notice of Correction to the contractor for any work that has not been completed in accordance with the payment request and/or contract documents.
- Rehab Specialist shall verify the correct tabulations of cost, retainage and percentages of items against the itemized cost on the DOW, making any necessary corrections as needed. **Note:** 5% retainage shall be held on all progress payments.
- Rehab Specialist shall prepare the payment package for processing as follows:
 - Prepare the IFAS Payment Request Worksheet;
 - Attach signed Application and Authorization for Payment request;
 - Attach a copy of the Purchase Request signature page;
 - Attach the most current Purchase Order;
 - Place a copy of the IFAS Worksheet, Application and Authorization for Payment signed by Rehab Specialist in the project file.
- Rehab Specialist shall submit the payment package to the Rehab Supervisor for processing to the Financial Analyst and the CD Manager, through established policies and procedures.

Summary: Procedure for making final payment on a rehab project

Position: Rehab Specialist, Rehab Supervisor, Financial Analyst

Action:

- Rehab Specialist, upon receipt of the final Application and Authorization for Payment, itemizing work completed and identifying 100% completion of the work, shall verify all signatures have been obtained (Owner and Contractor) and verify calculations are correct.
- Rehab Specialist shall contact Owner and schedule a time to make a complete inspection of the work performed on the property. The inspection shall verify that the materials used and installed meet the requirements as stated in the contract documents. The Rehab Specialist shall answer any questions and address any concerns from the Owner pertaining to the work performed in accordance with the contract documents. Any work that does not pass the Rehab Specialist's inspection will be put on the Notice of Correction for and payment to the Contractor will be put on hold until necessary corrections have been made and another inspection by the Rehab Specialist has been completed. If no corrections are required, the Rehab Specialist will obtain the Owners signature on the Certificate of Final Inspection along with the Rehab Specialist signature and proceed to the next step.
- Rehab Specialist shall prepare the payment package for processing as follows:
 - Prepare the IFAS Payment Request Worksheet;
 - Attach signed Application and Authorization for Payment request;
 - Attach a copy of the Purchase Request signature page;
 - Attach the most current Purchase Order;
 - Place a copy of the IFAS Worksheet, Application and Authorization for Payment signed by Rehab Specialist in the project.
- Rehab Specialist shall submit the final payment package to the Rehab Supervisor for processing to the Financial Analyst and the CD Manager, through established policies and procedures.
- Rehab Specialist shall obtain the signed Waiver of Lien prior to making payment to the Contractor. **Note:** Payment can be processed, however the payment cannot be given to the contractor without a signed Waiver of Lien. Place the original in the project file.
- Rehab Specialist shall prepare the Notice of Substantial and Notice of Final Completion, obtain the Rehab Supervisor's signature and placed in the project file to establish the

start/end date for the one-year warranty period from the Contractor. The Rehab Specialist shall sign both documents and place in file for Rehab Supervisor's signature.

Procedure SFR – 16	Processing Final Payment (cont.)
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- Rehab Supervisor shall review the project file and payment request for final close-out of the project. The Rehab Supervisor shall approve the payment requests as established in Policies and Procedures and forward to the Financial Analyst.
- Rehab Supervisor shall sign the Notice of Substantial and Notice of Final Completion as indicated in the project file.

Summary: Procedure for completing the final project file close-out

Position: Rehab Specialist, Rehab Supervisor, Financial Analyst, CD Manager

Action:

- Rehab Supervisor shall review entire project file to ensure all documents are completed, signed and place in the file in accordance with the established file check list.
- Rehab Supervisor shall review the contract documents, payments processed, and loan documents for accuracy in total project costs. Rehab Supervisor shall revise the Original Loan Set-up (if necessary) to address the actual dollars to be charged to the Borrower(s) loan.
- Rehab Supervisor shall revise the Original HUD Project Set-up (if necessary) to include all costs associated with the rehabilitation of the property, which can include but not be limited to the follow:
 - Actual Loan costs
 - Actual Lead-based Paint reduction work, testing, and reports
 - Other Grants, if any
- Rehab Supervisor shall prepare the Final HUD Voucher Request form. **Note:** During the rehab of the project, all progress payments or testing payments made are processed once the loan has been signed, rescind period has expired, and a Purchase Order has been issued.
- Rehab Supervisor shall prepare the Final HUD Project Completion Form, which includes all costs of the project.
- Rehab Supervisor shall prepare the File Close out package which includes the following:
 - Revised Loan Set-up and Memorandum, if applicable
 - Revised HUD Project Set-up, if applicable
 - Final HUD Voucher
 - Final HUD Project Completion Form
 - Copy of all the above will be placed in the file; Originals will be processed to the Financial Analyst.
- Financial Analyst will process final draw down and close-out of the project in IDIS under establish policies and procedures for IDIS.

- Rehab Supervisor shall forward the completed project file to the specific Rehab Specialist to complete the file close-out and project completion package to the Borrower(s).

Procedure SFR – 17	Processing Final Payment (cont.)
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- Rehab Specialist shall prepare the Project Completion package and send to the Borrower(s). The package shall include but not be limited to the following items:
 - Cover Letter which provide the Owner with final instruction pertaining to the one(s) year Contractor warranty.
 - Copies of all Change Orders, page 1 of all the payment request the owner signed, Certificate of Final Inspection signed by the Borrower, the Certificate of Substantial and Final Completion forms, and the signed Waiver of Lien by the Contractor.
 - Complete copy of the Lead-based paint Reports including the initial inspection all testing, Risk Assessment and Final Clearance Report.
- Rehab Specialist shall review project file ensuring all signatures have been obtained by the Rehab Supervisor. Rehab Specialist shall proceed to update the data base and file completed project file in the appropriate draw in the filing room.

Summary: Resolution of disputes between the Borrower(s) and the Contractor

Position: Rehab Specialist, Rehab Supervisor, CD Manager

Action:

- The Borrower is responsible for resolving construction and post-construction complaints with the Contractor. The Rehab Specialist shall assist, as needed, in getting the Owner and the Contractor to work together to resolve any differences. The Rehab Specialist and/or Rehab Supervisor may be required to informally mediate when the Owner and the Contractor cannot resolve their dispute. The Rehab Specialist and/or Rehab Supervisor shall not assume that either the Owner or the Contractor is “right” but shall review the facts of the dispute carefully and in accordance with the contract documents.

The Community Development Division must not function as an arbitrator in such matters. The CD Division must abide by the Contract Documents. In doing so, CD Division must withhold the balance of the contract in accordance with contract documents until the dispute is resolved. In the case where CD staff has verified the work to be completed in accordance to the contract and industry standards then, per the contract documents, CD may authorize the disbursement and process for payment without the Owner’s signature, documenting the reasoning used for doing so in the project file.

The CD Manager has authority to determine the best resolution to the dispute in order to complete the project to close out. Resolution could include but not be limited to:

- Reduction of loan pertaining to the disputed item if work is not completed;
- If work is completed, CD Manager could make that part a grant to owner and pay the contractor

Summary: Procedure for processing Contractor Default on a Rehabilitation Project

Position: Rehab Specialist, Rehab Supervisor, CD Manager

Action:

- In cases of Contractor Default, when the CD Division is reasonably certain that the Borrower has properly exercised his/her legal rights and responsibilities under the terms of the contract documents, the Owner with the assistance of the CD Division (if requested), must secure the services of a new Contractor to complete/correct the work in accordance with the contract documents. Prior to awarding to a new Contractor, the following steps must be adhered to:
 - Stop Work Order issued on the project to the original General Contractor
 - Inspection of work completed, identifying any deficiencies in the work, if any
 - CD Division, on behalf of the Borrower, shall request a written right to Cure from the Contractor. The written Right to Cure will include a statement as to why he/she has failed to finish (Cure) the project and shall include what steps the Contractor plans to take to finish the Contract in a specified time.
 - The Borrower and the Rehab Specialist shall review the written response from the Contractor and if the statement is accurate and the Borrower is acceptable to extending the contract to complete the project, the Contractor will be allowed to move forward with the completion of the project. If the statement is insufficient reasoning for failing to Cure the project, the CD Division will immediately remove the original Contractor from the project and start the process of finding a new Contractor to finish/correct the work. Funds will not be paid to the original Contractor until work on the original contract has been completed by the new Contractor. If any funds are remaining one the project has been completed, those funds may be paid to the original Contractor, once a Waiver of Lien and all manufacturer warranty papers have been provided to the Borrower.

In cases of established Contractor Default, the CD Division will immediately remove that General Contractor from the approved Contractor Bid List. Any Contractor removed from a project due to Contractor Default will be banned from the Bid list indefinitely. The ban can include but not be limited to the original name of the Firm (ABC Contracting), same owner of a banned company operating under a new name (ABC Contracting now doing business as DEF Contracting).

- Contractor default can be deemed if the General Contractor does not honor their 1 year warranty to the Borrower and the City has to pay another Contractor to complete the warranty work.

Summary: Procedure used when dealing with Foreclosure Notices on Rehabilitation Projects

Position: Rehab Supervisor, Financial Analyst, CD Manager

Action:

- Rehab Supervisor shall review all foreclosure notices to determine recommended action to be taken. Action to be taken can include the following:
 - Allowing the foreclosure to proceed without a Right to Redeem – recapture any overpayment from the final sale up to the principle loan amount. Must follow specific County instructions.
 - If feasible, initiate our Right to Redeem. Send the Foreclosure request to the assigned City Attorney to process the Notice of Right to Redeem and follow legal advice on how to redeem property.
 - Allow it to go to foreclosure and write off the loan.

Summary: Procedure for the processing of Bankruptcy Notices

Position: Rehab Supervisor, Financial Analyst, CD Manager

Action:

- Rehab Supervisor shall, upon receipt of the Bankruptcy Notice review the type of bankruptcy and determine if it includes the rehabilitation loan.

In most cases, unless it is a liquidation bankruptcy, because there are no monthly payments associated to the rehab loan, the bankruptcy does not include the rehab loan and it stays in place.

If the bankruptcy includes the rehabilitation loan, then if the bankruptcy goes through, CD staff will need to write the loan off.

Summary: Procedure for processing requests for Loan Pay-off

Position: Rehab Specialist, Rehab Supervisor, Financial Analyst, Admin Technician

Action:

- Client's lender contact's the Financial Analyst to request a loan pay-off, provides a date the pay-off is to be good through.
- Financial Analyst will provide the lender with the loan pay-off by email, fax, or regular mail.
- Upon receipt of the loan pay-off funds, the Financial Analyst and the Admin. Tech will follow established policies and procedures for pertaining to deposit of funds, posting of receipts in Loan Ledger.
- Upon step 3 above being complete, the Admin Tech will process the Release of Deed of Trust in accordance with specific County instructions. Once the County has recorded the Release of Deed of Trust, the Admin Tech will mail the recorded release in accordance to pay-off instructions from the lender, place copy of the recorded release in the project file and file the project file in the appropriate file cabinet in the file room.

Summary: Procedure for processing a request for a loan subordination

Position: Rehab Specialist, Rehab Supervisor,

Action:

- Rehab Supervisor, or designated staff, shall address all calls from Lenders requesting a Subordination Agreement on a SFR loan. Subordination requests must pertain to the refinance of the borrower's first mortgage (combination of existing second mortgage into a new first mortgage refinance may be considered on a case by case basis).
- Rehab Supervisor, or designated staff, will email the lender the current established subordination policy for Rehabilitation Loans. This policy may change without notice. The subordination package includes:
 - Policy and requirements for a subordination request;
 - Blank COA – Community Development Subordination Agreement (must be our agreement and not the Lenders)
- Rehab Supervisor, or designated staff, upon receipt of the Subordination package from the lender, review and analyze the documentation to determine if the subordination meets the minimum requirements of the policy.

If it does, the Rehab Supervisor, or designate staff, will prepare the official Subordination Agreement for the CD Manager signature.

If it does not, the Rehab Supervisor, or designated staff, will contact lender for additional information and/or send a written letter signed by the CD Manager, denying the request and why it was denied. The Lender may request from Community Development.

- A copy of the approved Subordination Agreement, shall be email/faxed to the Lender, the original will be sent either by USPS or prepaid FedEx (lender must provide a prepaid label) to the lender for signature at the closing by the Borrower(s). A copy of the subordination agreement will be stapled to the recorded DOT in the safe and a copy of the subordination will be placed in the project file. Once the recorded subordination is received, it will replace the copy stapled to the recorded DOT in the safe.

Note: SFR Loan Subordinations are granted only one time.



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Community Development Division
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**Emergency Solutions Grant Program
Policies and Procedures
Revised 09.27.2019**



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I. Purpose

The United States Government, through the Stewart B. McKinney Homeless Act of 1987, the Stewart B. McKinney Homeless Assistance Amendments Act of 1988, and the National Affordable Housing Act of 1990, has established the **Emergency Shelter Grant** (ESG) Program.

On May 20, 2009, the President signed into law Public Law 111-22 ("PL 111-22"). PL 111-22 consisted of two divisions. The first division, Division A, was entitled the Helping Families Save Their Homes Act of 2009. The second division, Division B, the "Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009" ("HEARTH Act"), amended the McKinney-Vento Homeless Act. The HEARTH Act modifies the existing **Emergency Shelter Grants** and renames it the **Emergency Solutions Grants Program** ("ESG"). The modification of ESG increases the eligible activities under the program. These activities may include the following services provided in shelters or as part of street outreach: prevention, rapid re-housing, emergency shelter activities, family support services for homeless youth, victim services and mental health services. It also expands homelessness prevention activities to include homelessness prevention and rehousing activities—short or medium term housing assistance, housing relocation or stabilization services,

housing search, mediation or outreach to property owners, legal services, credit repair, security or utility deposits, utility payments, and assistance with moving costs—for people who are homeless or at risk of homelessness. In addition, the HEARTH Act makes **HMIS participation** a statutory requirement for ESG Recipients and Subrecipients. Victim service providers must use a comparable database that produces unduplicated, aggregate reports instead.

The Emergency Solutions Grant (ESG) policies and procedures incorporate 24 CFR 91 HEARTH Act of 2009 and 24 CFR Part 576 ESG Interim Rule changes and the City of Aurora’s Consolidated Plan and Annual Action Plan, follows these changes.

All sub-recipients will be required to administer projects utilizing ESG funds in a manner consistent with all federal statutes and regulations, ESG policies and procedures, the City of Aurora’s Consolidated Plan and Aurora’s Homeless Plan “Aurora @ Home”.

II. Definitions of Homelessness 24 CFR §576.2

In order for individuals and families to be eligible to receive ESG assistance, they must first meet the definition of Homelessness as defined by HUD at 24 CFR §91, 582, and 583. In addition, to be eligible to receive ESG Homelessness Prevention assistance, the At Risk of Homelessness definition at 24 CFR Part §576.2 may apply.

Sub-recipients must utilize funds for individuals or families who fall into one of the following categories or who can be defined as At Risk of Homelessness:

Category 1: Literally Homeless: Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; (ii) an individual or family living in a supervised publicly- or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 2: Imminent Risk of Homelessness: Individual or family who will imminently lose their primary nighttime residence, provided that: (i) the primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; (ii) no subsequent residence has been identified; and (iii) the individual or family lacks the resources or support networks, e.g., family, friends, faith-based, or other social networks, needed to obtain other permanent housing.

Category 3: Homeless under other Federal Statutes: Unaccompanied youth under 25 years of age, or families with children and youth who do not otherwise qualify as homeless under this definition, but who; (i) are defined as homeless under section 387 of the Runaway and Homeless youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2013), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); (ii) have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days, immediately preceding the date of application for homeless assistance; (iii) have experienced persistent instability as measured by

two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and (iv) can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

Category 4: Fleeing/Attempting to Flee DV: Any individual or family who: (i) is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (ii) has no other residence; and (iii) lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

III. Definitions of Homelessness Prevention

At Risk of Homelessness means an individual or family who: (i) has an annual income below 30 percent of median family income for the area, as defined by HUD; (ii) does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph 1 of the "homeless" definition in this section; and (iii) meets one of the following conditions:

- (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance.
- (B) Is living in the home of another because of economic hardship.
- (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of application for assistance.
- (D) Lives in a hotel or motel, and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, state, or local government programs for low-income individuals.
- (E) Lives in a single-room occupancy or efficiency apartment unit in which resides more than two persons or lives in a larger housing unit in which resides more than 1.5 persons per room, as defined by the U.S. Census Bureau.
- (F) Is exiting a publicly-funded institution or system of care (such as a health-care facility, a mental health facility, foster care of other youth facility, or correction program or institution).
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

Preference for Use: Rapid ReHousing funds in Aurora

HUD has strongly emphasized (in many of their webinars and guidance's) that recipients use ESG funds for RRH rather than HP and the City of Aurora has decided to follow this guidance. ESG Homelessness Prevention funds are only to be used in the case of an economic downturn and subrecipients must seek approval first. An example of an economic downturn occurred during the Great Recession, when non-profits were unable to spend RRH funds, this situation has since been remedied through the use of Landlord Navigators (who locate available rentals).

IV. Eligible Applicants

The City of Aurora will make funds available to nonprofit organizations who provide services to persons residing in Aurora. The subrecipients will then provide services to their clients. ESG grants are never allocated directly to individuals or clients.

The COA reserves the right to use any information reported to the COA for the purpose of identifying eligibility. All agencies must submit the applicable information as outlined on the application checklist and application.

How funds are distributed amongst eligible uses

Street Outreach & Emergency Shelter – funds cannot be more than 60% of the entire annual allotment of ESG funds

Administration – funds cannot be more than 7.5% of the entire annual allotment of ESG funds

Rapid ReHousing and Homelessness Prevention – funds cannot exceed 32.5% of the entire annual allotment of ESG funds

HMIS – if HMIS funds **are** set aside, this amount would be shared with the 32.5% of the Rapid ReHousing and Homelessness Prevention funds.

Current funded agencies

Mile High Behavioral Healthcare / Comitis Crisis Center – emergency shelter

Gateway Domestic Violence Services (previous name – Gateway Battered Women’s Services)– domestic violence shelter

East Metro Detox & Recovery/AuMHC – Detox Shelter

Community Housing Partners – Rapid ReHousing and Homelessness Prevention

Mile High Behavioral Healthcare / Comitis Crisis Center – emergency shelter

Aurora Mental Health Center/PATH program – Rapid ReHousing and Homelessness Prevention

Salvation Army/Aurora Corps – Rapid ReHousing and Homelessness Prevention

Funded in the past:

Arapahoe House Inc. – detox treatment center and homeless case managers

Aurora Mental Health Center/PATH program – Street Outreach

Mile High Behavioral Healthcare / Comitis Crisis Center – street outreach

Colfax Community Network – street outreach

Gateway Battered Women’s Services – domestic violence shelter

Procedures to apply

Due to strict ESG regulations and the need for agencies to have capacity to maintain an ESG program, ESG funds have been distributed to the main core of human service agencies within the City of Aurora. Annual applications are completed by these core agencies and submitted to the Community Development Division. When there have been occasions to fund new agencies, new agencies are contacted and asked to submit an application.

Models for Selecting Sub-Recipient(s) (Managing CDBG, A Guidebook for CDBG Grantees on Subrecipient Oversight)

Following are a variety of approaches to select subrecipients:

Model 1: formal application or request-for-application (RFA) process;

Model 2: simplified or limited application, with grantee follow-up;

Model 3: grantee survey of qualified organizations, with direct solicitation;

Model 4: response to unsolicited applications; or,
Model 5: review of existing subrecipients' performance, before renewing their participation.

Model 1 is currently used to select subrecipients.

Capacity

Applicants must be able to show Capacity

1. Only eligible project activities that meet the following will be considered:
 - a. Must meet City of Aurora's strategic goals to end homelessness as outlined in the City's Consolidated Plan and Aurora's Homeless Plan "Aurora @ Home". The Consolidated Plan and the Aurora @ Home plan can be found online on the City of Aurora's website.
 - b. Must be eligible under the definitions of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act.
 - c. Under the HEARTH Act, must coordinate activities with the Continuum of Care- Metro Denver Homeless Initiative (MDHI) process to carry out ESG eligible activities.
 - d. Must demonstrate the capacity to participate in/and meet the performance and reporting requirements under the Homeless Management Information System (HMIS).
 - e. Strengthening Aurora's participation in the Metro Denver Homeless initiative (MDHI) Continuum of Care by addressing gaps in residential and non-residential services and/or ;
 - f. Develop and implement a plan of street outreach, emergency shelter, rapid re-housing and homelessness prevention activities that emphasize the objective of "housing stabilization".
 - g. Goals and actions that specifically prioritize serving homeless families with dependent children, unaccompanied youth, veterans and chronically homeless.
 - h. Cultivate collaboration between the recipient agency and other Aurora agencies that work with the homeless, the "Aurora at Home" plan and the Continuum of Care process;
2. Projects that show collaborative effort with at least one other agency to provide stated services.
3. Projects from service providers that have at least two years' experience in successfully providing at least one of the following eligible Emergency Solutions Grant (ESG) components:
 - a. Street Outreach:
Ability to provide Essential Services which include: Engagement, Case Management, Emergency health and mental health services, transportation and services for Aurora homeless families with dependent children, unaccompanied youth, veterans and chronically homeless. Ability to use the HMIS data entry system.
 - b. Emergency Shelter:
Ability to provide Essential Services to homeless families and individuals in a shelter, which includes: case management, counseling, resources, referrals, ongoing risk-assessment and safety planning, childcare, education, employment assistance, etc. and ability to provide for operations and maintenance of shelter. Ability to use the HMIS data entry system.
 - c. Rapid Re-Housing:
Rapid ReHousing assistance to help Aurora homeless families with dependent children who are literally homeless, veterans and chronically homeless, to move into permanent housing and achieve housing stability. Activities include: case management, locating

housing and stabilization services as well as short and medium term rental assistance. Ability to use the HMIS data entry system.

d. Homelessness Prevention:

Preference for Use: Rapid ReHousing funds in Aurora, see page 5

Homelessness Prevention assistance to help Aurora homeless families with dependent children who are at-risk of becoming homeless to achieve housing stability. Activities include: case management, housing relocation and stabilization services as well as short and medium term rental assistance. Ability to use the HMIS data entry system.

Performance Measurements and Outcomes

Applicants will be required to address U.S. Department of Housing and Urban Development (HUD), MDHI and COA consolidated plan and the Aurora @ Home homeless plan performance measures as they relate to outcomes to be achieved.

All ESG proposals must address all applicable Performance Measurements and Outcomes.

Performance Measurements and Outcome Requirements:

Objective: Increase access to affordable housing options for Aurora residents and reduce or prevent the incidents of homelessness by meeting critical emergency housing needs through the development and maintenance of quality affordable housing and the strengthening of human services delivery.

Outcomes:

1. End chronic homelessness and move homeless families and individuals into permanent housing.
2. Availability/accessibility for the purpose of creating suitable living environments.
3. Promote self-sufficiency, efficient use of funds and effective program administration.

Performance Measures/Indicators (Applies to all ESG funded projects):

- Number of homeless persons receiving case management who move into safe and stable housing.
- Average cost per person receiving ESG assistance.
- Recipient expended all ESG funds within the established grant timeframe.
- Recipient met the deadline for submitting their signed grant agreement.
- Recipient met the deadline for submitting evidentiary documents.
- Recipient met the deadline for submitting performance reports.
- Recipient meets required standards for documentation of homelessness.
- Recipient complies with required record keeping methods.
- Recipient complies with the due process of terminating ESG funded assistance of participant.
- Does recipient have current non-corrected and/or corrected findings from previous compliance reviews?

Performance Measures/Indicators specific to ESG-Funded Shelter and Transitional Housing:

- Number of homeless persons receiving case management who move into safe and stable housing.
- Average cost per person receiving ESG assistance.
- The total number of adults and children served on an annual basis (reported under Residential Services).
- The number of persons served by race and ethnicity.

Performance Measures/Indicators specific to ESG-Funded Homelessness Prevention & Rapid

ReHousing:

- Number of persons assisted with ESG funds for security deposits and/or first month's rent.
- Number of persons assisted with ESG funds to regain housing stability in their current permanent housing.
- The total number of adults and children served on an annual basis (reported under Non-Residential Services).
- The number of persons served by race and ethnicity.

Performance Measures/Indicators specific to ESG-Funded Essential Services:

- Number of homeless persons that received ESG funded services concerned with employment.
- Number of homeless persons that received ESG funded services concerned with health.
- Number of homeless persons that received ESG funded services concerned with substance abuse.
- Number of homeless persons that received ESG funded services concerned with education.
- Number of homeless persons that become successfully independent of ESG funded services.
- Number of homeless persons that return to their prior living situation.
- The total number of adults and children served on an annual basis (reported under Non-Residential Services).
- The number of persons served by race and ethnicity.

HUD's 2014 National Objectives on Performance:

- 1) Create new permanent housing beds for chronically homeless persons.
- 2) Increase the percentage of participants remaining in CoC-funded permanent housing projects for at least six months to 80% or more.
- 3) Increase the percentage of participants in CoC funded transitional housing that move into permanent housing to 80% or more.
- 4) Increase the percentage of participants in all CoC funded projects that are employed at program exit to 20% or more.
- 5) Increase the percentage of participants in all CoC funded projects that obtain mainstream benefits at program exit to 56% or more.
- 6) Increase the percentage of participants in all CoC-funded projects that obtained or increased income from other sources (i.e. cash benefits) at program exit to 54% or more.
- 7) Decrease the number of homeless households with children.

The City will coordinate with the CoC to meet new applicable HUD Objectives when released by HUD. The CoC shall seek to accomplish HUD's Objectives as an average for the whole CoC: individual CoC funded projects are not required to accomplish the Objectives individually. The Subrecipient shall seek to meet the current HUD Objectives to the maximum extent practical. The CoC will use the HMIS system to measure these outcomes.

Performance Monitoring and Performance Measures - The federal Department of Housing and Urban Development (HUD) and Continuum of Care (CoC) Program Interim Rule requires project- level and system-level performance monitoring and project-level compliance monitoring. **This requires poor performers (recipients and subrecipients) to improve or possible action to be taken.**

The CoC/ESG Performance Monitoring and Evaluation Policies and Procedures document establishes the process by which the CoC will:

- 1) Set annual performance measures and targets in consultation with the COC Board;
- 2) Monitor CoC and ESG recipient performance;
- 3) Evaluate and report outcomes;
- 4) Provide technical assistance to poorly performing projects; and

5) Identify poor performers for technical assistance or further action. See 24 CFR 578.7(a)6 and 24 CFR 578.65, Subpart E.

Performance Measurements/Indicators specific - to “Aurora@Home”, the City of Aurora’s Ten Year Plan to Prevent and End Family Housing Loss

- 1) Reduce the unsheltered homeless population of the Aurora Area
- 2) Reduce the recipient’s average length of times stayed for clients served in your program
- 3) Document the percentage of persons exiting the program who transition to permanent housing
- 4) Percentage of persons exiting your program who leave with employment income.
- 5) Percentage of persons who remain engaged in substance abuse counseling and mental health counseling services after leaving your program.
- 6) Percentage of persons who exit and return to homelessness within 3 months.

Goals:

Goal 1: Prevention

Assist at-risk families in obtaining Aurora@Home Services at the earliest possible point in time to reduce risk and prevent housing loss.

1.1.2 Develop clear entry points through current service providers to quickly assess needs and develop service plans.

Goal 2: Emergency Shelter and Rapid Re-Housing Efforts:

Improve housing outcomes for Aurora’s displaced families by increasing needed housing capacity and ensuring access to the most appropriate housing options

2.3.4 Develop formalized partnerships with the regional continuum of care and state efforts to help to meet the needs of displaced families.

Goal 3: Provide, Development and Implement Supportive Services

Continually assess, develop and provide services that meet the diverse needs of at-risk and displaced families to support them in obtaining and maintaining stable housing.

3.1.2 Coordinate efforts with county and state programs to facilitate efficient and timely access to publicly supported benefit programs.

Objective 3.3: Develop and provide client driven support services to help families be successful with their housing and employment goals, including increased access to intensive primary health, substance abuse, and mental health services.

3.3.2 Increase access to appropriate and responsive health, substance abuse and mental health services for children and families.

Goal 4: Promote Responsive System Infrastructure and Sustainability

Develop and implement infrastructure, systems and processes that support effective service delivery and the achievement of desired outcomes.

Objective 4.1: Develop tools and procedures to comprehensively assess the needs of at-risk and displaced families to identify the most responsive set of services.

Consolidated Plan Certification

All applications will be reviewed for consistency with the Metro Denver Homeless Initiative (MDHI) Consolidated Plan. No application will be funded that is not consistent with the appropriate Consolidated Plan. Each newly funded application must complete a Certificate of Consistency.

Matching Funds Requirements 24 CFR §576.201

Each grantee must match the funding provided by ESG with at least an equal amount of funds from other sources. These funds must be provided after the date of the grant award. Matching contributions may be obtained from any source, including any federal source other than the ESG

program, as well as state, local, and private sources. However, the following requirements apply to matching contribution from a federal source of funds:

The recipient must ensure the laws governing any funds to be used as matching contributions do not prohibit those funds from being used to match Emergency Solutions Grant funds.

If ESG funds are used to satisfy the matching requirements of another federal program, funding from that program may not be used to satisfy the matching requirements under this section.

Contributions used to match a previous ESG grant may not be used to match a subsequent ESG grant.

Contributions that have been or will be counted as satisfying a matching requirement of another federal grant or award may not count as satisfying the ESG matching requirement. Matching funds can be cash or noncash contributions.

Documentation Required

Agencies applying for funding through the Emergency Solutions Grant Program must provide sufficient documentation to evidence the following:

- 1) Proof of 501(C)(3) status
- 2) Copy of all required HMIS reports. (Those entities participating in HMIS) 24 CFR §91, 576, 580, and 583
- 3) Copies of all required Annual Performance Reports (APR)

Homeless Participation (on Board) 24 CFR §576.405

Sub-recipients must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the sub-recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under ESG. To the maximum extent practicable, the sub-recipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

Program Requirements Subpart E 24 CFR §576.400

In order to comply with this section of the ESG guidelines, entities must comply with the following:

Coordination with Other Targeted Homeless Services:

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 (CoC) area over which the services are coordinated to provide strategic, community-wide system to prevent and end homelessness for that area.

Aurora falls within the jurisdiction of the Metro Denver Homeless Initiative (MDHI). Once MDHI completes the Written Standards for the entirety of the CoC, then Aurora is required to follow these.

System and Program Coordination with Mainstream Resources:

Sub-recipients 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.

Centralized or Coordinated Assessment:

Once the Continuum of Care has developed a centralized assessment system or a coordinated assessment system in accordance with requirements to be established by HUD, each ESG-funded program or project within the CoC's area must use that assessment system. Sub-recipients must work with the CoC to ensure the screening, assessment and referral of program participants are consistent with the written standards required by paragraph (e) of this section. A Victim Service Provider (VSP) may choose not to use the CoC's centralized or coordinated assessment system.

MDHI has completed the system for coordinated assessment, the "OneHome" system and the Aurora ESG program must begin using for their RRH/HP ESG funded components. This has been finalized in 2018. For the RRH/HP programs, all clients must be referred from the OneHome coordinated Access System---which is overseen by the MDHI CoC .

Written Standards for Providing ESG Assistance:

Sub-recipients must have written standards for providing ESG assistance and must consistently apply those standards for all program participants. In Aurora, the first ESG RRH/HP subrecipient began developing these standards through their participation with the A@H Collaborative. These forms have now been updated (by the City of Aurora in 2018) for the Aurora ESG RRH/HP program.

Aurora is required to follow the CoC/MDHI's written standards, Policies and Procedures, and paperwork/forms. Until the MDHI paperwork and forms are standardized, Aurora ESG RRH/HP agencies may use the updated Aurora ESG forms.

Policy and Procedures (P&P) – Aurora ESG RRH/HP subrecipients will use the A@H written Procedures/standards for exit, termination, case management, etc. as these were developed with the Aurora ESG RRH/HP subrecipient agency.

Participation in HMIS 24 CFR §91, 576, 580, and 583:

Sub-recipients must ensure that data on all persons served and all activities assisted under ESG are entered into the Colorado HMIS system, or a Domestic Violence comparable database, in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. Information entered into a comparable database must not be entered directly into the Colorado HMIS data system.

Conflicts of Interest 24 CFR §576.404

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 recipients, sub-recipient, or a parent of either. No sub-recipient may, with respect to individuals or families occupying housing owned by the sub-recipient, or any parent or subsidiary of the sub-recipient, carry out the initial evaluation required under 24 CFR §576.103. For the procurement of goods and services, the sub-recipients must comply with the codes of conduct and conflict of interest requirements under 24 CFR §84.36 (for governments) and 24 CFR §84.42 (for private nonprofit organizations). Refer to 24 CFR §576.404 (b)(1) (2) (3) for additional restrictions.

V. Allocation of Funds

Funding for ESG is distributed by a block grant formula to states and large cities. Previous allocation levels do not guarantee current allocation amounts. The allocation of funds will be

dependent upon funding from the Department of Housing and Urban Development (HUD) and the City of Aurora Annual Action Plan.

Previous awards do not guarantee funds or serve as an indication of the level of funding for any subsequent years.

Reallocation of Funds

The COA may deem it appropriate to recapture ESG funds. In such case, the COA may re-allocate the funds or they may invite agencies to submit an application for additional funds based on their expenditure rate and other performance criteria outlined below.

Eligible and interested applicants will be required to provide additional documentation at the time of additional funding notification. Factors considered for additional funds through reallocation may include:

- Current expenditure rate.
- The agency's ability to provide the minimum match.
- The agency must be able to show capacity to spend the funds per allocated category.
- The agency must have no unresolved issues as a result of an ESG desk audit, TA visit, and/or monitoring review.
- Agency must be in good standing with ESG HMIS, ESG reporting and ESG draw requests. Agencies receiving recaptured funds must be able to meet all commitment and expenditure guidelines.

If an ESG agency can successfully demonstrate eligibility, it may be considered for a reallocation of funds.

With good cause, the City of Aurora Community Development program reserves the right to modify the stated requirements at any time.

VI. Eligible Uses

ESG funds may be used for one or more of the five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and the Homeless Management Information System (HMIS), as well as administrative activities. Subject to the cost principles in 2 CFR part 200 and other requirements in this part, employee compensation and other overhead costs directly related to carrying out street outreach, emergency shelter, homelessness prevention, rapid re-housing, and HMIS are eligible costs of those program components.

1.) Street Outreach Component 24 CFR §576.101

ESG funds may be used for costs of providing essential services necessary to reach out to **unsheltered** homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, **non-facility-based care** to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Refer to §576.101 for eligible costs and requirements for essential services.

2.) Emergency Shelter Component 24 CFR §576.102

ESG funds may be used for costs of providing essential services to homeless families and individuals **in emergency shelters**, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters.

Refer to §576.102 for eligible costs and requirements.

3.) Homelessness Prevention Component 24 CFR §576.103

Preference for Use: Rapid ReHousing funds in Aurora, see page 5.

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in 24 CFR §576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the “at risk of homelessness” definition or who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in 24 CFR §576.2 and have an annual income below 30 percent of median family income for the area, as defined by HUD.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing.

Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR §576.105, the short-term and medium-term rental assistance requirements in 24 CFR §576.106, as outlined below, and in the written standards and procedures established by 24 CFR §576.400.

Housing Relocation and Stabilization Services:

In relation to the Homelessness Prevention Component and the Rapid Re-Housing Component, ESG funds may be used to pay housing owners, utility companies, and other third parties for financial assistance costs and services costs. Refer to 24 CFR §576.105 for eligible costs and requirements

Short- and Medium-Term Rental Assistance:

In relation to the Homelessness Prevention Component and the Rapid Re-Housing Component, ESG funds may be used to provide a program participant with up to 24 months of rental assistance during any three-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance. Refer to 24 CFR §576.106 for eligible costs and requirements.

** Case Management is a key component of Homelessness Prevention.*

4.) Rapid Re-Housing Assistance Component 24 CFR §576.104

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance, referred to as rapid re-housing assistance, may be provided to program participants who meet the criteria under paragraph (1) of the “homeless” definition in 24 CFR §576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition. The rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR §576.105, the short- and medium-term rental assistance requirements in 24 CFR §576.106, as outlined below and in the written standards and procedures established under 24 CFR §576.400.

Housing Relocation and Stabilization Services:

In relation to the Homelessness Prevention Component and the Rapid Re-Housing Component, ESG funds may be used to pay housing owners, utility companies, and other third parties for financial assistance costs and services costs. Refer to 24 CFR §576.105 for eligible costs and requirements.

Short-Term and Medium Term Rental Assistance:

In relation to the Homelessness Prevention Component and the Rapid Re-Housing Component, ESG fund may be used to provide a program participant with up to 24 months of rental assistance during any three-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance. Refer to 24 CFR §576.106 for eligible costs and requirements.

** Case Management is a key component of Rapid ReHousing.*

5.) HMIS Component 24 CFR §576.107

ESG funds may be used to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area. Refer to 24 CFR §576.107 for eligible costs and requirements.

6.) Administrative Expenses 24 CFR §576.108

Sub-recipients may use a portion, as defined in the grant agreement, of its ESG grant for the payment of administrative costs related to the planning and execution of ESG activities. This does not include staff and overhead costs directly related to carrying out activities eligible under 24 CFR §576.101 through 24 CFR §576.107, because those costs are eligible as part of those activities. Refer to 24 CFR §576.108 for eligible costs and requirements.

7.) Program Income

In the event ESG funds are returned to the agency (e.g., rent deposits), those funds are considered to be Program Income. The agency is expected to use those funds to serve another eligible client and to document in accordance with ESG financial tracking guidelines. If it is not possible to use the funds to serve another client, program income must be returned to the City of Aurora to be used for eligible ESG purposes.

Specific Program Activities

1. Rapid ReHousing

A. INTAKE and COORDINATED Assessment

1. The Subrecipient shall receive 100 percent of its referrals for RRH assistance under this project through the OneHome Coordinated Entry System.
2. The Subrecipient shall comply with OneHome Policies and Procedures as posted on the MDHI website: <https://www.onehomeco.org/governance>
3. The Subrecipient shall collect and maintain participant data demonstrating the participant's eligibility for services received.
4. Such data shall include, at a minimum, the data required by the HMIS Data and Technical Standards prescribed by HUD, and the ESG Initial Assessment.

B. Housing Relocation and Stabilization Services - Financial Assistance

1. Last month's rent
2. Security deposits
3. Rental application fees
4. Utility deposits

5. Utility payments
6. Moving costs
7. Short term rental assistance (up to 3 months)
8. Medium term rental assistance (4 to 24 months)

C. Housing Relocation and Stabilization Services - Services Costs

1. Housing Search and Placement
2. Assessment of Housing Barriers
3. Development of Action Plan for locating housing
4. Assessment of housing for compliance with ESG standards
5. Assistance with obtaining utilities and making moving arrangements
6. Tenant counseling
7. Housing Stability Case management
- 8. Centralized Assessment system to be utilized**
9. Conduct initial evaluation
10. Counseling
11. Developing, securing, coordinating services and obtaining government benefits
12. Monitoring and evaluating progress
13. Mediation
14. Legal services
15. Credit repair
16. Housing counseling

D. Population to be Served

1. Homeless - as defined by "Homeless" 24 CFR 576.2 (1) or (4)
2. 30% AMI or below

E. All program participants must be entered into HMIS data system

F. Program Documents:

1. Client File documents
2. Verify eligibility
 - a. Verify Household is homeless---3 ways to prove
 - i. Third Party Verification
 - ii. Review of Documents
 - iii. Self-Certification
 - b. The Sub Recipient must certify eligibility at least once annually for a rapid rehousing program participants receiving medium term rental assistance (4-24 months)
3. Income statements
4. Homeless verifications
5. Exits
6. Terminations of Housing Assistance
7. Process of Termination

2. Homelessness Prevention

Preference for Use: Rapid ReHousing funds in Aurora, see page 5

A. INTAKE and COORDINATED ASSESSMENT

1. The Subrecipient shall receive 100 percent of its referrals for RRH assistance under this project through the OneHome Coordinated Entry System.
2. The Subrecipient shall comply with OneHome Policies and Procedures as posted on the MDHI website: <https://www.onehomeco.org/governance>
3. The Subrecipient shall collect and maintain participant data demonstrating

the participant's eligibility for services received.

4. Such data shall include, at a minimum, the data required by the HMIS Data and Technical Standards prescribed by HUD, and the ESG Initial Assessment.

B. Housing Relocation and Stabilization Services - Financial Assistance

1. Last month's rent
2. Security deposits
3. Rental application fees
4. Utility deposits
5. Utility payments
6. Moving costs
7. Short term rental assistance (up to 3 months)
8. Medium term rental assistance (4 to 24 months)

C. Housing Relocation and Stabilization Services- Services Costs

1. Housing Search and Placement
2. Assessment of housing partners
3. Development of Action Plan for locating housing
4. Assessment of housing for compliance with ESG standards
5. Assistance with obtaining utilities and making moving arrangements
6. Tenant counseling
7. Housing Stability Case management
- 8. Centralized Assessment system to be utilized**
9. Conducting initial evaluation
10. Counseling
11. Developing, securing, coordinating services and obtaining government benefits
12. Monitoring and evaluating progress
13. Mediation
14. Legal services
15. Credit repair
16. Housing counseling

D. Population to be Served

1. Persons at risk of Homelessness - as defined by "At Risk of Homelessness" 24 CFR 576.2 (1), (2), or (3) OR by "Homeless" 24 CFR 576.2 (2), (3), or (4).
2. 30% AMI or below

E. All program participants must be entered into HMIS data system

F. Program Documents:

1. Client File documents
2. Verify eligibility
 - a. The Subrecipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs **not less than once every 3 months for program participants receiving homelessness prevention assistance § 576.401 (b)**
3. Income statements
4. At-risk of Homelessness; verification that a family will imminently lose their primary nighttime residence: the primary nighttime residence will be lost within 21 days of the date of application for assistance; no subsequent residence has been identified; and the individual or family lacks the resources or support networks, *e.g.*, family, friends, faith-based or other

- social networks, needed to obtain other permanent housing
- 5. Exits
- 6. Terminations of Housing Assistance
- 7. Process of Termination

3. Emergency Shelter Program

A. Essential Services under 24 CFR 576.102 include:

1. Eligible Services

- a. Assistance in obtaining permanent housing.
- b. Medical and psychological counseling and supervision.
- c. Employment counseling.
- d. Nutritional counseling.
- e. Substance abuse treatment and counseling.
- f. Assistance in obtaining other (Federal, state and local assistance in which there is a need or entitlement (e.g., SSI, veteran pension, food stamps, etc.).
- g. Other services such as child care, transportation, job placement, and job training.
- h. Staff salaries necessary to provide the above services.

2. Ineligible Services

- a. Existing services and staff (services must be **new** or **expanded** and or provide services to **more people**).
- b. Salary of case management supervisor when not working directly on participant issues.
- c. Advocacy, planning and organization capacity building.
- d. Staff recruitment and or training not directly associated with service delivery.
- e. Transportation costs not directly associated with service delivery.

B. Operation Activities – Costs to operate and maintain emergency shelter activities and also provide other emergency lodging when appropriate. *

1. Eligible Operation Activities under 24 CFR 576.102 include:

- a. Maintenance costs associated with the program.
- b. Operational expenses (means expenses incurred by the agency to operate the facility or program).
- c. Insurance expenditures associated with the program.
- d. Utilities expenditures associated with the program.
- e. Furnishings associated with the program.
- f. Administration costs of the operation.
- g. Fuel costs associated with the program.
- h. Equipment for housing the program.
- i. Hotel and motel voucher for family or individuals *
Hotel or motel vouchers are only eligible when no appropriate emergency shelter is available

a. Ineligible Operation or Maintenance Activities include:

- 1. Recruitment or on-going training of staff.
- 2. Depreciation of equipment.
- 3. Costs associated with the organization/agency rather than the supportive housing project.
- 4. Staff training, entertainment, conferences, or retreats.
- 5. Public Relations on fund raising.
- 6. Bad debts and late fees.
- 7. Mortgage payments are not eligible under the ESG Program.

VII. Policies & Procedures for Eligible Participants 24 CFR §576.401

Additional RRH Procedures - see word documents:

- ESG_Workshop (MDHI) (002) (sd changes)
- RRH Standards Denver FINAL (sd notes)
- OneHome_HUD-Aligned_P_P_12.6.17_Public_Comment.pdf
- Prioritization_Clarification.pdf
- MDHI-CITY FORMS—CLIENT FILE

Policies and Procedures for RRH & HP

Policies and procedures must be written for how program activities are to be carried out. The Aurora @ Home collaborative, which utilizes the ESG funds for the RRH and HP activities for their collaborative, have added written standards for how these funds will be used per Subpart E-Program Requirements 576.400. The Recipient (COA) has participated in this process to ensure accuracy.

Evaluations (for Rapid ReHousing and Homelessness Prevention)

Sub-recipients 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 24 CFR §576.400 (d) and the written standards established under 24 CFR §576.400 (e).

Re-Evaluations (for Rapid ReHousing and Homelessness Prevention)

Re-Evaluations for Homelessness Prevention and Rapid Re-Housing Assistance – Sub-recipients must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every three months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance. Refer to 24 CFR §576.401(b) (i) (ii) for requirements.

Annual Income – When determining the annual income of an individual or family, the sub-recipient must use the standard for calculating annual income under 24 CFR §5.609

Connecting Program Participants to Mainstream and Other Resources – Sub-recipients must assist each program participant to obtain appropriate supportive services and other federal, state, local, and private assistance available.

Housing Stability Case Management – When providing homelessness prevention or rapid re-housing assistance to program participant, the sub-recipient must: require program participant to meet with a case manager not less than once per month to ensure long-term housing stability, and develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations. Refer to 24 CFR §576.401(e) (i) (ii) for requirements.

Terminating Assistance 24 CFR §576.402 (for Rapid ReHousing and Homelessness Prevention)

If a program participant violates program requirements, the sub-recipient may terminate the assistance in accordance with a formal process established by the sub-recipient that recognizes the rights of individuals affected. The sub-recipient 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. Rental assistance or housing relocation and stabilization services programs require a formal process. Refer to 24 CFR

§576.402 (1) (2) (3) (c) for requirements.

Shelter and Housing Standards 24 CFR §576.403 (for Rapid ReHousing, Homelessness Prevention, Emergency Shelter)

The Lead-Based Paint Poisoning Prevention Act applies to all shelters assisted with ESG funds and all housing occupied by program participants. Any building for which ESG funds are used for conversion, major rehabilitation, or other renovation, must meet state or local government safety and sanitation standards, as applicable, and the minimum safety, sanitation, and privacy standards. Any emergency shelter that receives assistance for shelter operations must also meet the minimum safety, sanitation, and privacy standards. Refer to 24 CFR §576.403 (1) thru (11) for requirements.

A sub-recipient cannot use ESG funds to help a program participant remain or move into housing that does not meet the minimum habitability standards. Refer to 24 CFR §576.403 (c)(1) through (10) for requirements.

Fair Housing

Sub-recipients must comply with all Fair Housing requirements. In order to be eligible, agencies must be able to satisfactorily address the impediments to fair housing. [Title VIII of the Civil Rights Act of 1968](#) (the Fair Housing Act), as amended, (www.justice.gov) prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, and familial status.

Affirmative Outreach

The Subrecipient must make known that use of the facilities, assistance, and services are available to all on a nondiscriminatory basis. If it is unlikely that the procedures that the recipient or Subrecipient intends to use to make known the availability of the facilities, assistance, and services will reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those facilities and services, the Subrecipient must establish additional procedures that ensure that those persons are made aware of the facilities, assistance, and services. The Subrecipient must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to, adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities. Consistent with Title VI and Executive Order 13166, Subrecipient is also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

VIII. Recordkeeping and Reporting Requirements 24 CFR §576.500

General

Sub-recipients must have policies and procedures to ensure the requirements of this part are met. The policies and procedures must be established in writing and implemented by the sub-recipient to ensure that ESG funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable the sub-recipient and HUD to determine whether ESG requirements are being met, in particular that HMIS data is collected on all clients.

Homeless Status (for Rapid ReHousing) - Certification

Sub-recipients must maintain and follow written intake procedures to ensure compliance with the homeless definition in 24 CFR §576.2. The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, 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.

Records contained in an HMIS or comparable database used by Domestic Violence service providers are acceptable evidence of third-party documentation and intake worker observations if:

If the program participant qualifies as homeless under paragraph (1)(i) or (ii) of the homeless definition in 24 CFR §576.2, acceptable evidence includes a written observation by an outreach worker of the conditions where the program participant was living, a written referral by another housing or service provider, or a certification by the individual or head of household seeking assistance.

If the program participant qualifies as homeless under paragraph (1)(iii) of the homeless definition in 24 CFR §576.2, because he or she resided in an emergency shelter or place not meant for human habitation immediately prior to entering an institution, and is now exiting that institution, where he or she resided for 90 days or less, acceptable evidence includes the evidence described in paragraph (b)(1) of this section and one of the following: Discharge; Where the evidence is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence and a certification by the individual seeking assistance that states he or she is exiting or has just exited an institution where he or she resided 90 days or less.

If the program participant qualifies as homeless because the individual or family will imminently lose their housing; a court order resulting from an eviction action that requires the program participant to leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law.

For program participants whose nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the program participant lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance.

An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible.

If the program participant qualifies as homeless under paragraph (3) of the homeless definition in 24 CFR §576.2, because they do not otherwise qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another federal statute or section 735(2) of the McKinney-Vento Homeless Assistance Act.

If the program participant qualifies under paragraph (4) of the homeless definition in 24 CFR §576.2, because they are fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes an oral statement by the individual or head of household seeking that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks to obtain other housing.

If the program participant is receiving shelter, the oral statement must be documented by either a certification by the individual or head of household; or a certification by the intake worker. Otherwise, the oral statement that the individual or head of household seeing

assistance has not identified a subsequent residence and lacks the resources of support networks needed to obtain housing must be documented by certification by the individual or head of household that the oral statement is true and complete, and, where the safety of the individual or family would not be jeopardized, the domestic violence, dating, violence, sexual assault, stalking, or other dangerous or life-threatening condition must be verified by a written observation by the intake worker of a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, dating violence, sexual assault, or stalking. The written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee.

At Risk of Homelessness Status - Certification

The definition of “at risk of homelessness” only applies to the ESG homelessness prevention component.

Aurora does not use funds for a “one and done” rental solution and require that all households given HP assistance also receive at the least 3 months of case management.

For each individual or family who receives ESG homelessness prevention assistance, the records must include the evidence relied upon to establish and verify the individual or family’s “at risk of homelessness” status. This evidence must include an intake and certification that meets HUD specifications and is completed by the sub-recipient. This evidence must also include: If the program participant meets the criteria under paragraph (1) of the “at risk of homelessness” definition in 24 CFR §576.2.

Documentation that determines that the annual income is below 30% AMI.

Notice of eviction, termination of housing

The most reliable evidence available to show that the program participant does not have sufficient resources or support networks, immediately available to prevent them from moving to an emergency shelter or another place described in the oral verification by the relevant third-party that the applicant meets one or both of the criteria under paragraph (1) (ii) of the definition of “at risk of homelessness” in 24 CFR §576. 2.

To the extent that source documents are unobtainable, a written statement by the relevant third-party (e.g., former employer, owner, primary leaseholder, public administrator, hotel or motel manager) or the written certification by the sub- recipient’s intake staff of the oral verification by the relevant third-party that the applicant meets one or more of the criteria under paragraph (1) (iii) of the definition of “at risk of homelessness.”

If the program participant meets the criteria under paragraph (2) or (3) of the “at risk of homelessness” definition in 24 CFR §576.2, certification of the child or youth’s homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act.

Determinations of Ineligibility (particularly RRH & HP)

For each individual and family determined ineligible to receive ESG assistance, these records must be retained and must include documentation of the reason for the determination .

Annual Income (particularly RRH & HP)

For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year, the following documentation of annual income must be maintained;

Income evaluation form containing the minimum requirements specified by HUD and completed by the sub-recipient; and

Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g. wage statement, unemployment compensation statement, public benefits statement, bank statement);

To the extent that source documents are unobtainable, a written statement by the relevant third-party (e.g., employer, government benefits administrator) or the written certification by the sub-recipient's intake staff of the oral verification by the relevant third-party of the income the program participant received over the most recent period for which representative data is available.

To the extent that source documents and third-party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the three-month period following the evaluation.

Program Participant Records

In addition to evidence of homeless status or "at risk of homelessness" status, as applicable, records must be kept for each program participant that document:

The services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant;

Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions at 24 CFR §576.101 through 24 CFR §576.106, the provision on determining eligibility and amount and type of assistance at 24 CFR §576.401 (a) and (b), and the provision on using appropriate assistance and services at 24 CFR §576.401 (d) and (e); and

Where applicable, compliance with the termination of assistance requirement in 24 CFR §576.402.

Centralized or Coordinated Assessment Systems and Procedures

Sub-recipients must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the CoC in accordance with the requirements established by HUD. See Policies & Procedures for OneHome (coordinated assessment) and Standards for CoC and ESG-Funded Rapid Re-Housing Programs in the Metropolitan Denver Continuum of Care.

Rental Assistance Agreements and Payments

The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental

assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

Rent Reasonableness Policy

Rental assistance cannot be provided unless the unit’s rent is at or below rent reasonable amounts in relation to amounts being charged for comparable units in the private, unassisted market. All rental units must consider: Rent Reasonableness, Gross Rent and Fair Market Rent (FMR).

ESG requires the gross rental amount for a unit cannot exceed the Fair Market Rent established by HUD nor the rent reasonableness amount for compared rentals. HUD allows a recipient and subrecipient to add to their Policies & Procedures a \$50 increase of gross rental amount beyond the amount of rent reasonableness and if the gross rent remains below the FMR amount. For further clarification see, the resource link on this page: <https://www.hudexchange.info/resource/3070/esg-rent-reasonableness-and-fmr/>

This \$50 rent adjustment to the gross rent has been approved in Aurora, through the A@H Services Committee meeting, as of 6/17/2014:

If the gross rent of a client is slightly higher (within \$50) of the average of the three rent reasonable comparables and is also at or below the FMR, that rent would still be considered “reasonable” under the recipient’s policy.

Utility Allowance Schedule Policy

The records must document the monthly allowance for utilities (excluding telephone), using the most current PHA Utility Allowance Chart to ensure units do not exceed HUD’s Fair Market Rent (FMR) restriction.

When a “comparable rental unit” doesn’t have a listed utility allowance, the (utility amounts from the Aurora Housing Authority (AHA) utility allowance chart) the amount to be used will be the same as the “proposed unit” and this amount will be added to the “comparable units”. This Policy was accepted as of 6/17/2014 and approved at the A@H Services Committee meeting.

Example:

	Proposed Unit	Unit #1 (comparable rental unit)	Unit #2 (comparable rental unit)
UNIT RENT	700.00	765.00	695.00
UTILITY ALLOWANCE	(amount from AHA utility allowance chart) 50.00	(if unknown, use proposed unit’s utility allowance**) 50.00	(**) 50.00
GROSS RENT	750.00	815.00	740.00

Average of all three gross rents (750.00+815.00+740.00) = \$768.00 (equals rent reasonable amount)

Procurement Standards

Procurement Standards. The Agency must establish procedures for the procurement of supplies,

equipment, construction and other services, with Federal funds. Such procedures must be consistent with the following:

A. No employee, officer, or agent of the Agency shall participate in the selection, award, or administration of any contract in which Federal funds are used, if he, his immediate family, or partner has a financial interest in such contract, or if he, his immediate family or partner has a financial interest in any organization which has a financial interest in said contract. The Agency's officers, employees and agents shall neither solicit, nor accept, gratuities, favors, or anything of monetary value from contractors or potential contractors. The Agency must provide for appropriate disciplinary action to be taken if any officer, employee, or agent should violate the terms of this paragraph.

B. All procurement transactions must be conducted in a manner to provide, to the maximum extent feasible, open and free competition. Awards must be made to the bidder or offer or whose bid or offer is responsive to the solicitation, and whose bid is most advantageous to the Agency.

C. The Agency must establish procurement procedures which provide for, at a minimum, the following procedural requirements:

- 1) Proposed procurement actions must follow a procedure to avoid purchasing unnecessary or duplicate items.
- 2) Solicitations for goods and services must be based upon a clear and accurate description of the technical requirements for the material, product or service to be procured. Such description must not, in competitive procurement, contain features which unduly restrict competition.
- 3) Positive efforts must be made by the Agency to utilize small business and minority-owned business sources of supplies and services.
- 4) The type of procuring instrument used, e.g., fixed price contract, cost reimbursable contract, purchase order, or incentive contract, must be determined by the Agency, but must be appropriate for the particular procurement and for promoting the best interest of the program involved. The "cost-plus-a-percentage-of-cost" method of contracting must not be used.
- 5) Contracts must be made only with responsible contractors who possess the potential ability to perform successfully under the terms and conditions of a proposed procurement. Consideration must be given to such matters as contractor integrity, record of past performance, financial and technical resources, and accessibility to other necessary resources.
- 6) All proposed sole source contracts, or contracts in which only one bid or proposal is received, must be subject to prior approval by City of Huntsville.
- 7) Some form of price or cost analysis should be made in connection with every procurement action. Price analysis may be accomplished in various ways, including the comparison of price quotations submitted, market prices and similar indicia, together with discounts.
- 8) Procurement records and files for purchases must include the following:
 - a) Basis for contractor selection or rejection;
 - b) Justification for lack of competition when competitive bids or offers are not obtained;
 - c) Basis for award cost or contract price;
 - d) Rationale for method of procurement; and
 - e) Selection of contract type.

All procurement transactions must be conducted in a manner providing full and open competition consistent with the standards of 2 CFR 200.319.

Per, HUD Regulation found at 570.502, 570.610, and 85.36, Small Purchasing Procedures allow recipients to acquire goods and services totaling no more than \$100,000. However, the purchase of goods and services with federal funding provided by the City of Aurora will adhere to the City's Purchasing Policy which is more restrictive and limits these purchases to under \$5,000.

Shelter and Housing Standards

The records must include documentation of compliance with the shelter and housing standards in 24 CFR §576.403, including habitability inspection reports and lead reports when there are children below the age of 6 years old.

Lead Requirements

ESG is governed by Subpart K of the Lead-Based Paint Hazard regulations and by the Environmental Protection Agency's 2008 Lead-Based Paint Renovation, Repair and Painting (RRP) Rule (as amended in 2010 and 2011), Title 40, Part 745. **ESG projects providing essential services only are excluded from all of the Lead-Based Paint regulations.** ESG funds used for facility renovation, repair, or painting will be subject to applicable HUD and EPA Lead-Based Paint regulations.

§ 576.403 Shelter and housing standards. (a) *Lead-based paint remediation and disclosure.* The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821–4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851–4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

Services and Assistance Provided

The sub-recipient must keep records of the types of essential services, rental assistance, and housing stabilization and relocation services provided under the sub-recipients program and the amount spent on these services and assistance. (See 24 CFR §576.101 and §576.102 for more details).

Coordination with Continuum of Care and Other Programs

The sub-recipient must document their compliance with the requirements of §576.400 for consulting with the CoC and coordinating the integrating ESG assistance with programs targeted toward homeless people and mainstream service and assistance programs.

Matching

The Recipient (City of Aurora) has passed the onus of responsibility of matching to the subrecipients of this funding. Every Payment Request must show the appropriate matching amount, along with invoices and documentation that the "matched funds" have been used.

Sub-recipients must keep records of the source and use of contributions made to satisfy the matching requirements in CFR 24 §576.201. The records must indicate the particular fiscal year grant for which each matching contribution is counted. The records must show how the value placed on third-party, noncash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

Conflicts of Interest

Sub-recipients must keep records to show compliance with the organizations conflicts-of-interest requirements in 24 CFR §576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in §576.404(b), and records supporting exceptions to the personal conflicts of interest prohibitions.

Other Federal Requirements

Refer to 24 CFR §576.500 (s) for requirements.

IX. Sub Recipient Agreement Processes

Check Requests/Reimbursements

All grant funds allotted to agencies are done through reimbursements. The paperwork required for reimbursements are these:

- Payment Request Form
- Payment Detail – can be subrecipient’s financial sheet which details the costs being submitted for reimbursement
- Invoices from bills paid and copies of checks indicating that the vendor was paid.
 - Dependent on the type of “bill” would indicate the type of back-up documentation required. A request for reimbursement of staff coast would include times sheets and pay stub for example. Back-up for a service, would include a statement of the amount owed and the amount paid.
- 100% match of ESG funds is required for **Shelter activities, Rapid ReHousing activities and Homelessness Prevention activities**. Supporting documentation (invoices, etc indicating that money was used to support the ESG grant funds) and should be attached for match with every payment request.

Budget Line Item Requests

The subrecipient may modify this budget only after having requested in writing and received prior written approval of the adjustment from the City of Aurora. A change in the budget 10% and under will mean a memo to the agency file. However, a change above 10% will require a formal amendment.

Reports due

Typically HUD allocates the ESG funds late in a calendar year and the agreements with subrecipients are signed mid-year (and the end date of the agreement is then mid-year of the following year). However, the quarterly reports are referring to a calendar year, so a subrecipient may be reporting on time periods in which they did not have an agreement in place.

Quarterly reports are due within thirty (30) days of the end of each quarter:

1. First quarter from January 1 through March 31, due on or before April 30.
 - **Emergency Shelters, Street Outreach, Rapid ReHousing and Homelessness Prevention programs complete an HMIS quarterly report and turn these into the Recipient’s ESG Contact person.
 - In addition, a narrative report is also submitted for the quarter.
 - Domestic Violence shelters are not allowed to enter data into HMIS and they will complete a different demographic and narrative report.
2. Second quarter from April 1 through June 30, due on or before July 30.
 - Emergency Shelters, Street Outreach, Rapid ReHousing and Homelessness Prevention programs complete an HMIS quarterly report and turn these into the Recipient’s ESG Contact person.
 - In addition, a narrative report is also submitted for the quarter.
 - Domestic Violence shelters are not allowed to enter data into HMIS and they will complete a different demographic and narrative report.
3. Third quarter from July 1 through September 30, due on or before October 30.

- Emergency Shelters, Street Outreach, Rapid ReHousing and Homelessness Prevention programs complete an HMIS quarterly report and turn these into the Recipient's ESG Contact person.
 - In addition, a narrative report is also submitted for the quarter.
 - Domestic Violence shelters are not allowed to enter data into HMIS and they will complete a different demographic and narrative report.
4. Fourth quarter from October 1 through December 31, due on or before January 30.
- Emergency Shelters, Street Outreach, Rapid ReHousing and Homelessness Prevention programs complete an HMIS quarterly report and turn these into the Recipient's ESG Contact person.
 - In addition, a narrative report is also submitted for the quarter.
 - Domestic Violence shelters are not allowed to enter data into HMIS and they will complete a different demographic and narrative report.

End of Year **report** covering **January 1 through December 31** due within thirty (30) days of December 31, due on or before **January 30**. Although no program expenses may be reimbursed until the Agreement is executed, all activity and client records from the start of the activity on January 1 through December 31 shall be included in the Year End report.

SAGE Reports Due

As of 2018, HUD is requiring demographic reports to be submitted through a system called SAGE. These are "Year End" reports that recipients are required to make sure that subrecipients submit their portion of the HMIS - SAGE reports (or Comparable Data reports for domestic violence shelters). These SAGE reports are due within 30 days of the December 31 date to the recipient agency (the City of Aurora). The City of Aurora is no longer allowing an extended grace period (beyond 30 days) and subrecipients submitting beyond the 30 may lose their grant allocations.

Coordinated Assessment/Access:

Subrecipient must use the centralized or coordinated assessment system established by the Continuum of Care as set forth in § 578.7(a)(8). A victim service provider may choose not to use the Continuum of Care's centralized or coordinated assessment system, provided that victim service providers in the area use a centralized or coordinated assessment system that meets HUD's minimum requirements and the victim service provider uses that system instead.

HMIS (Homeless Management Information System)

The Subrecipient shall keep accurate books and records of accounts in accordance with generally accepted accounting principles of all expenditures made and all costs and liabilities incurred utilizing Program Funds and Program Income. The aforementioned accounts and all project records shall be made available upon request by the City, U.S. Department of Housing and Urban Development (HUD), or any other federal agency for examination and audit. All books and records of accounts must be retained for four (4) years from the date of this agreement.

According to the March 2010 HMIS Data Standards, a bed or service is considered participating in HMIS "if the provider program makes a reasonable effort to record all universal data elements on all clients served in that bed (or service) and discloses that information through agreed upon means to a HMIS Lead Agency at least once annually." For domestic violence agencies, a comparable data base should be utilized.

Victim Service Providers – Collection of Data

If Subrecipient is a victim service provider it is still required to enter client-level data on ESG beneficiaries/clients into a comparable database, which collects all of the HMIS universal data elements listed in this paragraph and generates unduplicated aggregate reports. Victim Service Providers must participate and keep themselves current in the process of developing this system in the Denver Metro area. The data must include the following data elements: Name, Social Security

Number, Date of Birth, Ethnicity, Race, Gender, Veteran Status, Disabling Condition, Residence Prior to Program Entry, Zip Code, Length of Stay at Previous Residence and Homeless Cause. The Subrecipient agrees to collect any other data elements as required by HUD as it updates its HMIS data standards, from time to time. The Subrecipient is required to update a client's status annually.

VAWA – Emergency Transfer Plan

The VAWA Final Rule requires PHAs to adopt an Emergency Transfer Plan, based on HUD's model Emergency Transfer Plan (form HUD-5381). HUD's model Emergency Transfer Plan is available at hud.gov/hudclips. (See 24 CFR 5.2005(e).) Owners of assisted housing or HCV (including project-based voucher) properties that are not PHAs or considered "PHA-Owned" are not the covered housing provider under this provision, and therefore, are not required to adopt an Emergency Transfer Plan. If an owner receives a request for an emergency transfer, the owner is encouraged to explain to the victim that the PHA is the covered housing provider for this activity, and that the PHA should be contacted directly.

Documenting that tenants have received a copy during their lease signing,

1. Establishes new requirements for notification of occupancy rights under VAWA, (form HUD-5380). (See 24 CFR 5.2005(a).)
2. Provides that applicants and tenants may not be denied assistance or have assistance terminated under a covered housing program on the basis of or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. (See 24 CFR 5.2005(b)(1).)
3. Establishes the requirement to establish an emergency transfer plan, establishes record keeping and reporting requirements (form HUD-5383). (See 24 CFR 5.2005(e).)
4. Revises requirements for documenting the occurrence of domestic violence (form HUD-5382). (See 24 CFR 5.2007.)
5. Where the covered housing provider exercises the option to bifurcate a lease and the evicted or terminated tenant was the recipient of assistance at the time of bifurcation, establishes a new requirement for reasonable time periods during which a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking may remain in the unit while establishing eligibility under the current housing program or under another covered housing program, or seeking alternate housing. (See 24 CFR 5.2009(b).)
6. For local guidance, see Aurora@Home Policies and Procedures.

Narrative Reports

The Recipient will request subrecipients to complete a written narrative which will include reporting data that is not captured on the HMIS report. This information will be used to further describe the program activities being accomplished. Upon occasion this information may be used to complete reports for City staff and City Council.

End of Year Reports: CAPER, ECart

The annual report covering January 1 through December 31 is due within thirty (30) days of December 31, of the following January 30. This report will be submitted in the form of a HMIS CAPER.

eCart becoming SAGE Report

Starting with the 2015 CAPER submissions, ESG recipients were required to report aggregated ESG Program report information at the subrecipient level, using the newly developed ESG eCart (the ESG-CAPER Annual Reporting Tool). The subrecipients obtained special Comma Separated Value (CSV) export reports from their HMIS administrator. Once they received this export/report they forwarded them to the ESG Recipient Program Contact. If there were any errors, the subrecipient would correct through the data through the HMIS system and then request a new HMIS

export/report. When all errors were fixed the report the process was repeated and then re-submitted to the ESG Recipient Program Contact.

As of 2018, HUD is requiring demographic reports, from the sub recipients, to be submitted through a system called SAGE. This system no longer goes back and forth to HMIS and the Recipient. The SAGE is a "Year End" report that Recipients are required to supervise, so that their Subrecipients submit their portion of the HMIS - SAGE reports (or Comparable Data reports for domestic violence shelters). Once the Subrecipients complete their SAGE report, the Recipient then uploads the report into the IDIS system. In the SAGE system, the onus of responsibility to complete the report is on the Subrecipient.

Agency Monitoring

Federal Regulations 2 CFR 200 Subpart D, requires that the Recipients of federal grant funds (in this case the City of Aurora) must conduct annual assessments and possible on-site monitoring of subrecipients. Annual risk assessments conducted by the Community Development staff determines which agencies will be subject to an on-site monitoring review.

An on-site monitoring may be deemed necessary as a result of our annual risk assessment review of all agencies and organizations currently acting as Subrecipients with the City of Aurora. Special attention will be given to areas rated as high risk and critical program functions identified during the annual risk assessment. An on-site monitoring includes an inspection of the project or tour of program facilities as appropriate, an explanation of the services and discussions with administrative staff.

The on-site monitoring is a detailed review of program performance and will focus on the specific Subrecipient program activities or projects detailed in the Subrecipient Agreements relevant to the specific year assessment process. Program staff may be asked to define the strategic plans for the related programs and, as applicable, how those plans are used to help clients in those programs. A randomly selected sample of activity or case files will be selected for review and should be of sufficient size to be able to draw a valid conclusion.

The City will monitor the Subrecipient which will include, but not limited to, assurance of compliance with new ESG definitions, utilization of the centralized and coordinated assessment system, fiscal integrity and accounting of utilization of funds as required by HUD, and entry of data into HMIS. To meet the requirements outlined for the use of ESG funds, quarterly meetings will be held with the Subrecipient to assess whether or not the milestones identified in the contract (e.g., number of clients to be served) and the ESG guidelines and regulations are met.

X. Public Information and Open Records Act Requests

All materials contained in applications for Emergency Solutions Grant are subject to the requirements of the, and the application materials may be viewed and copied by any member of the public. Applicants seeking to claim a statutory exemption to disclosure from open records requests, which may be made, must place all documents viewed as confidential in a sealed envelope marked "Confidential." Applicants must be aware that if an open records request is made for any of the application materials, COA will make an independent determination of confidentiality and may or may not agree with the applicant's determination regarding the confidentiality of the materials. COA will publish via email an announcement of all awarded applications for the current application round. The list will be made available within sixty days of the current application deadline.

XI. ESG Program Contact

All questions or comments about the ESG Program should be directed

to: Sharon Duwaik
Program Specialist
Community Development
City of Aurora
9898 E Colfax Ave
Aurora, CO 80010
303-739-7916
sduwaik@auroragov.org

XII. Additional Information

For more information on the Emergency Solutions Grant regulations and guidelines, please visit the U.S. Department of Housing and Urban Development Web site at www.hudexchange.info.

Adopted the 9th day of September, 2015, revised this 27th day of September, 2019.

By: _____
Community Development Manager

POLICIES AND PROCEDURES

HOME OWNERSHIP ASSISTANCE PROGRAM

PROCEDURE A

SECTION: Home Ownership Assistance Program (HOAP)
Down Payment/Closing Cost Assistance

SUBJECT: Applicant Eligibility

SUMMARY: Procedure for determining eligibility of applicant(s) HOAP Down Payment/Closing Cost Assistance. Procedures in accordance with 24CFR57.201(n) and Handbook 1378, Chapter 5, Paragraph 1, Relocation and Real Property Acquisition and Handbook No. 7610-1, Rev.-5.

POSITION: Housing Counselor

ACTION:

A **preliminary** determination of income eligibility is made when the client(s) comes into the office for their one on one interview with a counselor. The Intake Sheet (pages 1 & 2) (See **Exhibit A**) are filled out by asking the client(s) specific questions in regard to employment, family size, monthly debts, etc. noting employer, acquiring the current income from recent check stubs, copies of last three (3) year's income tax return transcripts from IRS, cash on hand from current bank and savings statements. Counselor asks client(s) if they are a first-time homeowner. If client is working with a Realtor and/or Lender, Realtor and Lender's name and telephone/fax numbers are to be noted on page two (2) of Intake Sheet. Debts with monthly payments and balances are listed and totaled to derive the income to debt ratio. Client is then counseled on amount of PITI they can afford. Financing is discussed and the client(s) is advised of their qualifications as to what monthly payment they should seek.

Client is also advised the HOAP assistance is a one-time assistance through the City of Aurora and no person or family will be eligible a second time for this program under any circumstances.

If client is not ready to buy at the time of intake, the file is kept in the open file drawer and follow up is completed every (3-6) month's until notified otherwise by the client. When doing follow up, if the client cannot be reached by phone, a follow up letter (See **Exhibit B**) will be mailed with a self-addressed return postage paid envelope.

Along with “Intake Sheets 1 & 2,” the following forms are to be filled out by and discussed with client(s). Effective (12-10-98) both spouses of the household will sign all HOAP documents regardless of whether or not one of them will not be on the title to the property. Any children or household members over 18 years old will NOT have to sign HOAP documents unless they will be on the title or loan for the property. (See **Exhibit A**):

- HOAP Intake Form
- HOME Fund Loan Agreement
- Legal Resident Affidavit
- Income Documentation Checklist & Marijuana Affidavit
- Client Authorization Form
- Displacement Affidavit - with discussion and understanding of relocation and displacement policies
- Inspection Notice, For Your Protection & HUD 10 Questions
- Home Buyer’s Acknowledgment - with discussion about client’s responsibility for providing timely income information to the HOAP office
- Equal Opportunity Housing Form
- Action Plan & Budget Worksheet
- Special District Addendum
- Lead Based Paint Risk Assessment Notification
- Lead Base Paint Notice (receipt of LBP brochure)

Copies are made of all documentation brought in by client(s) and put in file according to the order on the “Checklist.” Counselors should set as a goal (2) two counseling sessions per day or a total of four (4) hours of face to face counseling per day. The remainder of the work day should be spent making files, returning phone calls and short follow up appointments.

This “Checklist” is attached on the left-hand side of file with “HUD-9921 Forms 1 & 2.” Complete proper code references for referral, dwelling type, loan type, and counsel type. (See **Exhibit C**.) The two HUD forms are used by recording each conversation and interaction completed with client(s). As documentation is put in file, initials, date and time should be noted on the note pages by counselor. Any activity for each file should be noted in the conversation log by date, time, what occurred, and the counselor or processor initials.

Applicant(s) qualifies for down payment/closing cost assistance. The HOAP Counselor will consider the following guidelines for determining eligibility:

- Income/Household Size
- Savings/Reserves Qualifications
- Property/Seller Qualifications
- First Time Home Buyer Criteria
- Quality of Loan Financing

NEW REQUIREMENTS FOR CLOSINGS OCCURRING ON/AFTER 06-01-2014:

- TO RESERVE HOAP FUNDING BUYER MUST PRESENT A FULLY SIGNED CONTRACT ALONG WITH A SIGNED COPY OF THE SELLER'S OCCUPANCY CERTIFICATION FORM.
- BUYER MUST HAVE VERIFIABLE SAVINGS EQUAL TO 2 MONTHS ESTIMATED PITI + HOA SHOWING ON 2 MOST RECENT BANK STATEMENTS. SEASONED FUNDS MAY INCLUDE EARNEST MONEY DEPOSIT, CREDIT REPORT, APPRAISAL AND INSPECTION FEES.
- BUYER MUST HAVE VERIFIABLE 2 YEAR WORK HISTORY.
- BUYER MUST PROVIDE 2 MONTHS BANK STATEMENTS AT APPLICATION WITH NO INSUFFICIENT FUNDS CHARGES EVIDENT.
- CREDIT REPORTS WILL BE USED TO VERIFY BUYER'S DEBT OBLIGATIONS.
- DEBT TO INCOME RATIOS: 31% (P+I ONLY) FRONT AND 50% BACK END WILL BE ENFORCED.
- ALL INSPECTION CONDITIONS / REPAIRS MUST BE COMPLETED PRIOR TO LOAN CLOSING -NO FHA 203K LOANS ACCEPTED.

Income/Household Size/Amount of Assistance

- Household income must not exceed 80% of Area Median Income.
- First Lien minimum loan to value allowed is 95%. Maximum amount of assistance is \$10,000. HOAP must be in second position behind the first mortgage in every transaction. The only exception is CHFA Home Access Disability loans where HOAP takes third position to provide long term affordability.
- Special consideration may be given, on a case-by-case basis, to special needs homebuyers (people with disabilities) purchasing through the CHFA Home Access Program. In this case, HOAP may participate in third position to buy down the principle amount of the first mortgage, buy down the interest rate of the first mortgage and pay all eligible closing costs and pre-paid expenses to stabilize the financial situation of the disabled individual or family. HOAP will also waive the 1% requirement for borrower participation and HOAP will follow the CHFA underwriting guidelines for the Home Access. Approval of the Program Coordinator and Division Manager is required in the loan file.
- In 2008, HOAP created a pilot incentive program for income eligible first-time home buyers. In addition to the HOAP down payment and closing cost loan, HOAP will also provide a \$3,000 grant to be paid directly to the first mortgage holder to reduce the principle amount of the first mortgage loan if the HOAP client purchases a vacant foreclosed property. **Program ended 12-31-08.**
- Birth Certificates, Marriage Certificates, Guardianship papers, etc. must be provided if there is no proof of a dependent from the previous year tax return. Proof of legal status in U.S. is required.

- If a co-signer is participating, they may be included only on the promissory note for the first mortgage. They may **NOT** be included on the deed of trust for the first mortgage or on the title to the property.
- If an applicant is married but not living with their spouse because of a separation and no legal proceedings were ever initiated, HOAP will require that the applicant either provide income figures for the absent spouse or provide a copy of the divorce decree with all attached exhibits and permanent orders once finalized.
- Annual income is the anticipated total income from all sources received by the family head and spouse (even if temporarily absent) and by each additional member of the household over 18 years old, including all projected gross income derived from assets for the 12 month period following the effective date of certification of income. HOAP must calculate anticipated income to be received in the next 12 months.
- Gross income includes interest, dividends, and other income of any kind from real or personal property.
- Any withdrawal of cash or assets invested by the family (401K/IRA/Retirement/Pensions), will be counted towards the borrower's maximum reserve limit to determine HOAP eligibility.

The Home Ownership Assistance Program will calculate income considering the following: Income is projected from both year-to-date gross pay stub and Verification of Employment (VOE). *Annual income as used in HUD programs like Section 8 and defined in 24 CFR 5.609.*

- To determine income level for HOAP program, we will use the highest calculation of the two. Any raises, bonuses and overtime shown on the VOE, will be projected and included in the calculation for the next 12 months.
- HOAP does not count the BAH Housing allowance for military personnel. HOAP will deduct that total from the YTD total.
- HOAP does not count past due medical bills in collections in the borrower's debt ratios. HOAP will not count children's savings accounts toward borrower savings.
- Other possible sources of income include alimony, child support, social security, disability, business income, commissions, tips, bonuses, annuities, pensions, unemployment, workers compensation, welfare assistance, etc.
- HOAP does not count the Employer Paid Health Savings Account contribution (HSA) as income for qualifying purpose.
- HOAP has determined that when a client has income based solely on commissions, HOAP will use the previous year net income figure from the tax return to determine the client's income forecast. In addition, if the client is less than \$1,000 over the income guidelines and was working overtime to save money for the home purchase, HOAP will take the overtime amount out of the average per check and then recalculate a new average per check w/o overtime, and then add back in the total overtime amount. This way HOAP does not penalize the client by including the higher average per check for the whole year when the client only worked overtime for a short period of time.

- 3 years tax return transcripts from IRS are collected from the borrower. The HOAP staff is looking to verify the following information only:
 - Show no previous ownership in property
 - Show income history and itemized interest deductions
 - Verify family size

Savings/Reserves Qualification

The Area Median Income is generally updated in the Spring of each year as provided by HUD. The Home Ownership Assistance Program will allow clients to have money in their bank accounts for the following reasons, as long as HUD income eligibility has been met:

- Client's bank and/or savings account(s) may show up to \$15,000 maximum amount per applicant.
- Retirement Funds, IRA's, Keogh's and Teachers Funds are not considered in calculations. HOAP does not require client to draw from these funds. HOAP does allow these types of funds to be counted as reserve funds.
- If client's employment is from construction or other seasonal work, HOAP will allow up to \$15,000.00 in additional savings beyond what HOAP normally allows to carry the client through the off season of that employment.
- At least one borrower must show a verifiable 2 year work history for loan qualification.
- If the client is sixty-two (62) years of age or older, or has disability as defined by Section 223 of the Social Security Act (42U.S.C. 423) or a developmental disability as defined in Section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Action (42USC6001) (7), clients may have up to \$15,000.00 in additional savings beyond what HOAP normally allows for future medical insurance payments.
- Also, clients who are 62 years of age or older and/or on fixed income, are allowed to retain, at HOAP Management's discretion, more in savings and/or retirement accounts. If client is 62 years of age or older with retirement funds in money market or mutual funds, the interest drawn out monthly will be counted as income to the household.
- Clients fifty (50) years of age or older, with no company retirement fund may have up to \$15,000.00 in additional savings beyond what HOAP normally allows set aside for retirement in an individual savings account.

HOAP will require the borrowers to provide two recent months of bank account statements to verify that no NSF charges have been applied.

If and when a signed and accepted real estate contract is entered into, a copy of the contract and seller's occupancy certification goes into the file. HOAP will determine property eligibility as follows:

Property/Seller Qualifications- Tenant Non-displacement

- Eligible properties for the HOAP program include Single Family Detached Residences (SFR's), condominiums and townhomes in conjunction with a new loan. No loan assumptions or owner carry back permitted. **Current Purchase Price Limit as of 6/28/2019 defined by HUD = \$332,000.**
- If the property is tenant occupied at the time the contract is written, except when the current tenant is buying the property they live in, the seller must provide proof that the tenant was not displaced by the sale of the property. The Seller's Occupancy Certification & Preliminary Value Estimate form must be presented to the seller along with the contract offer. No HOAP reservation will be allowed without the signed contract and Seller's Occupancy Certification form dated the same day. Seller must provide sufficient proof that no tenants were displaced within the last 90 days. Seller must also complete and sign the Voluntary Acquisition Letter affirming that the tenant was not displaced after the property appraisal has been released.
- The Voluntary Acquisition Letter (See **Exhibit D**) is then prepared and sent to the selling or listing agent for the owners of the subject property to sign prior to closing. Not applicable to HUD and bank owned foreclosed properties.
- If seller does not sign the Voluntary Acquisition Letter, the property is not eligible for the HOAP program assistance. If the subject property is occupied by a tenant, who is intent on purchasing a different property, the tenant's purchase contract must be dated prior to the purchase contract of the subject property, and the tenant must be interviewed by HOAP staff to ascertain that the tenant is not being displaced, or the City of Aurora will not be able to assist with the purchase of the subject property. If this proof is obtained and, in the file, then the City of Aurora may assist the buyers of the subject property and **NOT** be responsible for relocation costs. If the tenant is purchasing their current rental residence, then the City of Aurora can assist the borrower.
- The City of Aurora is unable to assist when dwellings are not permanently affixed to a permanent foundation such as a mobile home in accordance with local or other applicable regulations; or
- Dwellings are not in compliance with state, local, or model building codes, and cannot be brought into compliance with such codes for less than the cost of constructing a permanent structure.
- As of September 15, 2000, any property built before 1978 that is being purchased using federal funds must be inspected for lead based paint hazards. The City of Aurora policy calls for a visual assessment of all painted surfaces as well as composite dust wipe sampling of interior surfaces to determine if a lead hazard exists in the home. Aurora HOAP will pay for the risk assessment to determine if a lead hazard exists. The property must be made lead safe using lead safe work practices. HOAP funding will not be provided unless proof of clearance report is received from the risk assessor. **(Effective August 2017) The seller of the property must complete the lead repairs at seller expense and will not be subject to the lead safe work practices rules, however, clearance testing by a certified risk assessor must be achieved after the seller repairs are completed.** HOAP can cover the cost of the lead based paint clearance report.

Clients applying for HOAP assistance must meet the criteria for a first-time homebuyer to include the following:

First Time Home Buyer Criteria

- First time homebuyer means an individual or an individual and his or her spouse and/or significant other who have not owned a home during the last three (3) year period. This will be verified through county records and/or tax transcripts
- In the instance when one spouse had prior home ownership (in the last three years and the other spouse is not appearing on title to the property), HOAP cannot assist as home ownership was a benefit to the household.

An individual may not be excluded from consideration as a first-time homebuyer under the following circumstances:

- Any individual who is a displaced homemaker may not be excluded from consideration as a first-time homebuyer on the basis that the individual, while a homemaker, owned a home with his or her spouse. In other words, the individual must not have worked while married and owning a home. If individual is still on the title and/or loan to the home from previous marriage, they must file a recorded quit-claim deed to property and refinance off the mortgage loan (if applicable) to qualify for HOAP assistance.
- Any individual who is a single parent may not be excluded from consideration as a first time homebuyer on the basis that the individual, while married, owned a home with his or her spouse or resided in a home owned by the spouse. The individual must have full or joint custody of the children. If an individual is still on the title or loan of the home from previous marriage, they must file a recorded quit-claim deed and refinance off the mortgage loan to the property to qualify for HOAP assistance.
- Revising the definition of “*homeownership*” to include manufactured housing which is on land owned by a not-for-profit cooperative if the homeowner is a member of the cooperative, by a not-for-profit resident corporation, or by a similar type not-for-profit resident control organization;
- Revising the definition of “*homeownership*” to explicitly permit ground leases of 50 years or more for community land trusts;

After the contract has been signed and received, the HOAP processor will send the Lender Document Checklist so the lender is aware of information we need to process HOAP loan (See **Exhibit F**). The HOAP loan processor will send the Voluntary Acquisition Letter to the listing agent. Once the lender provides HOAP with the required documentation the processor will advise the lender of the HOAP review schedule: HOAP requires 10 business days to process the funding request.

As of May 1, 2003, HOAP approved a **\$10,000.00 maximum loan** to all eligible borrowers.

HOAP pre-purchase counselor or loan processor to send Dear Realtor, Dear Lender, and Dear Borrower letters and seminar schedule as requested along with a copy of our program guidelines to ensure all parties are familiar with the HOAP guidelines (See **Exhibits G, H, & I**).

Because HOAP loans federal dollars to our clients, all borrowers will be required to sign a Marijuana Affidavit. Borrowers must verify that they do not have a Medical Marijuana card. Anyone using Marijuana, will not be eligible for HOAP assistance.

Procedure when client is turned down for HOAP assistance.

When a client has come in for their one-on-one appointment, and during the course of the intake procedure or loan processing procedure, it is determined that the client is not eligible for HOAP assistance the following steps must be taken:

1. Notify client verbally and discuss the reason for the denial.
2. Notify client's realtor and lender as soon as possible.
3. Mail client the Reason for Application Denial Letter (**Exhibit X**) with reason for denial clearly marked.
4. Keep copy of letter for the file.

Documentation in the client's file should be in the following order:

- Completed Intake Sheet
 - HOME Fund Loan Agreement
 - Legal Resident Affidavit
 - Income Documentation Checklist & Marijuana Affidavit
 - Client Authorization Form
 - Displacement Affidavit
 - Inspection Notice, For Your Protection & HUD Inspection Questions
 - Home Buyers Acknowledgment
 - Equal Opportunity Housing Form
 - Action Plan & Budget Form
 - Closing Data Sheet & FHA Mortgage Value Limits Certification
 - Commitment Letter to Lender & Income Calculation Form with Income Limits
 - Driver's License and Social Security Card or Permanent Resident Card
 - Title Commitment showing legal description
 - Signed Seller's Occupancy Certification & Preliminary Value Estimate and Real Estate Sales Contract
 - Signed Special District Addendum
 - Lead Based Paint Risk Assessment Notification & Receipt of LBP brochure
 - Lead Hazard Screen (if applicable)
 - Flood Certificate (if requested by Lender)
 - Site Specific Checklist
 - Proof of Inspection Condition Repairs
 - Inspection Report
 - Seminar Certification
 - Power of Attorney, if needed
 - Birth Certificates, Divorce Decrees, etc. if needed
 - Affidavits (Other)
 - Child Support Registry (if applicable)
 - Gift Letter
 - Voluntary Acquisition Letter
 - Verification of Deposit
 - Verification of Employment
 - Copy of Loan Estimate
 - Copy of Loan Application from Lender
 - Copy of Appraisal
 - Appraisal Conditions, if applicable
 - Copy of two most recent pay stubs showing year-to-date earnings
 - Three years tax return transcripts from IRS
 - Insurance with City of Aurora as 2nd mortgagee
- Post Closing Documents/ Copies of HOAP Loan Docs
- Promissory Note, Truth in Lending, Deed of Trust & Notice
 - Copies of First Mortgage Deed of Trust, Promissory Note and Closing Disclosure
 - HOME Voucher Request
 - Draw Down Close Out Date
 - Affordability Period Begins Date

PROCEDURE B

SECTION: Home Ownership Assistance Program (HOAP)
Down Payment/Closing Cost Assistance

SUBJECT: Loan Processing and Closing

SUMMARY: Procedure for signing necessary papers, obtaining documents from banking institutions. (Loan Closing) Procedures in accordance with 24CFR570. (201)(n) and Handbook 1378, Chapter 5, Section 1, Relocation and Real Property Acquisition and Handbook No. 7610.3, Rev-5.

POSITION: Housing Counselor and/or Loan Processor

ACTION:

- Obtain complete loan package (See Procedure A for documents) to include appraisal and inspection report. Initial and date on checklist when received.
 - Re: Verification of Deposits (VOD): The HOAP Program will use the borrower's 2 recent bank statements for all open checking and savings accounts.
 - Re: Pay stubs – HOAP requires that the pay stubs in the file be dated within 60 days of the closing date.
 - When calculating debt to income ratios for the client, loan processor should count 25% of the total amount of the “placed collection” on the credit report because that is the amount that it would take to settle the debt with the collection company. Medical collections will not be counted towards borrower's DTI ratio.
 - If the credit report does not show a required minimum payment amount and there is no supplemental documentation to support a payment of less than 5%, HOAP requires the use of 5% of the outstanding balance as the borrower's recurring monthly debt obligation.
 - If a monthly student loan payment is provided on the credit report, HOAP may use that amount for qualifying purposes.
If the credit report does not reflect the correct monthly payment, HOAP may use the monthly payment that is on the student loan documentation (the most recent student loan statement) to qualify the borrower.
If the credit report does not provide a monthly payment for the student loan, or if the credit report shows \$0 as the monthly payment, HOAP must determine the qualifying monthly payment using one of the options below.
 - If the borrower is on an income-driven payment plan, HOAP may obtain student loan documentation to verify the actual monthly payment is \$0. HOAP may then qualify the borrower with a \$0 payment.
 - For deferred loans or loans in forbearance, HOAP may calculate a payment equal to 1% of the outstanding student loan balance (even if this amount

is lower than the actual fully amortizing payment), or a fully amortizing payment using the documented loan repayment terms.

- Re: Verification of Employment (VOE). If the lender is using verbal verifications of employment, forms, the HOAP program will accept them also.
- Following receipt of appraisal, notify seller of fair market value for Voluntary Acquisition Letter, (See **Exhibit D**). Get signed and dated by seller and returned to office to be kept in file. Processor needs to verify correct value and initial on the Voluntary Acquisition Letter.
- Following receipt of complete inspection report by an independent property inspection company, give report to the Community Development Housing Quality Standards Certified Inspector to review for health and safety items. All property inspections will be reviewed to meet City of Aurora property standards and Housing Quality Standards (H.Q.S.) according to HUD regulations. Each of the major systems are to have a remaining useful life for a minimum of 5 years. All health and safety items noted must be fixed prior to closing. No repairs after closing will be allowed under any circumstances. HOAP staff member to send inspection notice (**Exhibit J**) to buyer's agent to notify them of all health and safety issues. HUD properties and FHA 203 K loans are no longer allowed in the program. If property was built prior to 1978, the Lead Based Paint requirements must be sent as well. Proof of no lead hazard and any required repairs on the property must be provided prior to release of HOAP funds and prior to closing.
- After receipt of Loan Estimate (LE) of closing costs, complete down payment calculation and prepare Closing Data Sheet to determine amount of HOAP assistance.

Determine allowable closing costs by checking allowable items on Loan Estimate (LE). Verify all fees with loan processor. This total should be added to the minimum down payment of FHA loans or Fannie Mae conventional loans up to 5.0% of the purchase price of the property. Add pre-paid items and HOAP recording fees (\$23.00 HOAP Deed of Trust filing fee) to the total. Then subtract the borrowers 1% contribution figure and seller paid items or lender credits from the total amount to determine the total amount of HOAP assistance.

- Prepare "Deed of Trust," "Truth in Lending Statement," and "Promissory Note" using the total figures for the allowable closing costs, pre-paid items and the minimum down payment depending on type of loan. See examples (**Exhibit N**).
- Effective June 2017, "HOME Fund Loan Agreement" will be prepared and included with the loan closing documents to be signed by the borrower at the time of settlement (**Exhibit O**).
- Send all of the legal documents to the HOAP Underwriter for review allowing a minimum of two (2) full days for approval.
- After approval, send "Check Request Summary" to accounting along with a copy of the Loan Estimate and a copy of the closing data sheet. Accounting requires a minimum of two (2) full days for processing, but that will run concurrently with the underwriter review. Underwriter will send a commitment letter to the lender signed by the HOAP supervisor or their designee. Commitment letter will include HOAP loan amount and will good for 30 days. Underwriter will send the HOAP figures and instruction page to the assigned title company (**Exhibit Z**).

- Keep in contact with client(s), realtor, title company and mortgage company as to when closing will take place.
- Loan Processor will contact the closer with the Title Company to request a preliminary copy of the Closing Disclosure (CD) form to verify that there is no cash back to buyer.
- Pick up check at cashier's office and take to closing along with original "Deed of Trust" with Exhibit A,"HOME Fund Loan Agreement", "Truth in Lending Statement," and "Promissory Note."
- Missing Check-On a normal work week, check requests are turned into CD Accountant by 12:00 PM on the Wednesday prior to the closing Friday. The checks are to be picked up at the Aurora Municipal Center around 10:00 AM on Friday. IF THE CHECKS ARE NOT THERE: DON'T PANIC!!! First contact Accounts Payable to see if they can determine if the check was cut. If so, try to have them ascertain the location of the check. If there is no record of the check being cut, or no one knows its whereabouts, then have Accounts Payable issue a "Hand Cut" check to replace the missing one. A copy of the check request will be in each file with all pertinent information to give to Accounts Payable.
- Attend closing to ensure borrower understands all documents. Explain to borrower why we are there and go over a brief description of program. Inform borrower that if there is a problem with their mortgage payment or if they have questions or concerns, to please call our office at the first sign of trouble. Remind client that HOAP assistance is a LOAN and will be repaid at some point in the future.
- Normally when we close on a HOAP loan, we attend the closing at the Title Company. Sometimes due to circumstances beyond our control, (Between Buyer and Sellers) it will become necessary to close our portion of the closing in our office here at 9898 E. Colfax Ave. Our documents would be notarized by one of our staff notaries or the title company closer. **PLEASE NOTE:** It is still necessary to obtain copies of the 1st mortgage documents after they have been executed. (1st Mortgage Promissory Note, Deed of Trust and Closing Disclosure (CD) Settlement Sheets.)
- Have client(s) sign all papers and bring originals of "Truth in Lending Statement" and "Promissory Note" to file in the safe at the office. Also, get a copy of the "First Deed of Trust," "First Promissory Note," and "Closing Disclosure Settlement" and insurance papers showing the City of Aurora as having a second lien on the property and place in file. Get copy of HOAP 2nd Deed of Trust and leave originals with the title company closer to file with the appropriate county.
- Check paperwork for a co-signer. If a co-signer is participating, they may be included on the promissory note on the first mortgage. They may **NOT** be included on the deed of trust for the first mortgage, Warranty Deed or title to the property.
- At closing, check the left side of the file checklist for any missing items and obtain those items from borrowers, agents, closer, etc.
- The original 2nd mortgage "Deed of Trust" is left with the title company for filing with the county and a \$23.00 filing fee is added to the closing costs. After filing, it is mailed to the Community Development office and is to be placed in the office safe.

- Copies of HOAP Note, Deed, Truth in Lending Statement and First Mortgage Note, Deed-of-Trust, Closing Disclosure Statement, and HOME Voucher Request are placed in the client(s) file in the Closing Data & Legal Documents section. The file is placed in the HOAP loan closed drawer in the filing room.
- After the accounting department draws down funds from the HUD IDIS Funding System the HOAP processor / administrative assistant will notify each borrower via regular mail what the appropriate affordability period begins and when it will be over. The letter will remind borrowers that they must live in the property the entire affordability period or sell the property so that City of Aurora, Community Development Division may recapture loan funds based on available net proceeds.
- Every year during the 5-year HOME affordability period, the Community Development Division will mail principle residence certification documents to all HOME assisted borrowers to verify that they are still occupying the property. These documents must be returned to Community Development in the postage paid envelopes provided or be considered in non-compliance with HUD HOME Regulations.

At closing, the borrower may not receive any funds back to them. Any remaining proceeds must be applied towards the principal reduction of the 1st or 2nd mortgage loan.

- Type new label showing borrower's first three letters of last name, first letter of first name and date of closing.
- After closing, give the "loan set up sheet" and a copy of the Truth in Lending Disclosure statement to accounting to input into loan ledger. Place original HOME Voucher Request in the file behind copies of the first mortgage documents.

Since HOAP is listed as a 2nd mortgagee on the hazard insurance policy, yearly proof of insurance is mailed to the HOAP office. New proof of insurance is filed in the client's closed loan file.

- If new proof of insurance indicates a rental policy, then HOAP staff must notify the original borrower that the loan is due and that they should call to make arrangements for payment.
- Each HOAP Counselor to lock all file cabinets before going home.

Special Rules for HOME Funds

HOME

- Does not make loans under \$1,000.00.

PROCEDURE C

SECTION: Home Ownership Assistance Program (HOAP)
Down Payment/Closing Cost Assistance

SUBJECTS: Pay off of HOAP Loan & HOAP Loan Write Offs

SUMMARY: Procedure for paying off HOAP loan by borrower.
Procedure for determining when to write off HOAP loan

POSITION: CD Administrative Technician & Sr. Housing Counselor

ACTION: LOAN PAY OFFS

- If you receive a request for a pay off, refer the request to the Division Accountant.
- Financial Analyst will send payoff information to the requestor.
- When payoff documents are received (after receiving verification or proof of payment from Accountant), the internal routing and release of Deed of Trust forms (**Exhibit Y**), will be prepared and filed with the appropriate county.
- Counselor submits the internal routing form, release of Deed of Trust form, original loan closing documents and loan payoff verifications to the CD Manager for approval and signature.
- After CD Manager approves and signs the release of Deed of Trust, Counselor will sign & notarize the release & mark the original loan closing documents as “PAID” with current date.
- Counselor submits the completed release & loan documents to the CD Administrative Technician, to record with the appropriate county.
- Counselor copies all documents for the file (release of Deed of Trust, HOAP Note, Truth in Lending and Deed of Trust). The originals are mailed to the borrower.

ACTION: PROCEDURE DETERMINING WHEN TO WRITE OFF HOAP LOAN

- HOAP is a secured 2nd mortgage filed with the county so HOAP receives notification from the public trustee when a loan goes into foreclosure most notably when the NED is filed or when the Rule 120 hearing occurs.
- When Counselor receives notification from public trustee he / she sends “Call Us” letter (**Exhibit AA**) to the client in foreclosure to come in for counseling to avoid foreclosure.
- File is then held by the Sr. Counselor to monitor for the public sale date. Once public sale occurs, the Sr. Counselor will print the proof of public sale notice from the Public

Trustee's website. This means the HOAP borrower no longer owns the property and HOAP lien is no longer attached to the property.

- Once the change in ownership occurs, the Sr. Counselor prepares the CHD Committee Loan Write-Off Notification form (**Exhibit BB**) and notates in the file the date of public sale and completion of CHD Loan Write-Off Notice. HOAP Supervisor, Financial Analyst and CD Manager reviews the file and signs the CHD Committee Loan Write-Off Notification form. CHD Committee is advised of loan write offs.
- In the instance where the foreclosure results in an overbid at the time of public sale, the Sr. Counselor prepares a \$50.00 check request payable to the appropriate public trustee & prepares the Notice of Lienor Intent to Redeem Affidavit (**Exhibit CC**). After Sr. Counselor receives the \$50.00 check & the notarized Notice of Lienor Intent to Redeem Affidavit, the Sr. Counselor physically goes to the County Clerk's Office to obtain a certified copy of the Deed of Trust.
- The \$50.00 check, completed Notice of Lienor Intent to Redeem Affidavit and certified copy of Deed of Trust are then delivered to the public trustee's office.
- Upon receipt of funds from the public trustee, the check is submitted to accounting.
- If a HOAP Loan client has a hardship and requests a short payoff, HOAP requires a hardship letter to determine if the circumstances were beyond their control. If the hardship qualifies, the letter is approved by the program coordinator and approval is obtained from the CD Administrator. An acceptance letter is generated and signed by the CD Administrator. When the agreed upon amount is received the release of DOT is prepared and the HOAP loan is released. Short payoff is noted in the file and the file is closed.

PROCEDURE D

SECTION: Home Ownership Assistance Program (HOAP)
Down Payment/Closing Cost Assistance

SUBJECT: Subordination Agreements

SUMMARY: Review Procedure to Determine COA Subordination

POSITION: HOAP Sr. Counselor/Program Manager

ACTION:

- When a mortgage representative for our client notifies the HOAP office of the intent to refinance the 1st Mortgage, a City of Aurora Subordination Agreement Loan Comparison Worksheet (**Exhibit DD**) is sent to the lender requesting information regarding the old and new loan, the interest rate for both loans, whether the loans are fixed or adjustable. The Worksheet must also state the City of Aurora will not agree to a subordination agreement if the new loan includes cash-out. The lender must submit the letter back to the HOAP office with the completed information (Counselor may request copy of Loan Estimate from lender). If the new loan is acceptable to the COA, (e.g., does not jeopardize the COA loan, no cash out, etc.) the HOAP Subordination Agreement (**Exhibit P**) is prepared and sent to the Community Development Manager for review and approval. **NOTE:** HOAP requires not less than five (5) business days for review and approval. Proof of current property insurance is required.
- The subordination request from the lender must also provide information on the total cost of the loan, total savings per month to the client and the total number of months to recover the cost of the loan, excluding escrows of taxes and insurance.

HOAP Counselor Review:

- The HOAP Counselor will review the Loan Comparison Worksheet to verify:
 - New Loan Amount
 - Interest (at least 1% rate reduction)
 - Loan Type (CONV, FHA, Fixed, ARM) 5 year ARM OK
 - Cost of Loan (excluding escrows for taxes and insurance)
 - Number of Months to recoup the cost of the new loan

NOTE: When reviewing a subordination request, the HOAP Counselor will also review for:

- Identify repeat subordinations: Although it may be advantageous to refinance a second time, the cost of the previous subordinated loan may not have been recouped, adding to the total cost of the loan(s), thus taking a longer period to recoup such cost.

Adjustable Rate Mortgages (ARMs): The current loan products on the market today vary considerably. Generally, an ARM will provide a lower interest rate than will a fixed mortgage. When the proposed loan is an ARM, the counselor will review the ARM to determine the rate changes, the benefit to the borrower, and the borrower circumstances. For example, a 5-1 ARM is quite advantageous when the borrower plans to sell prior to the end of the fifth year (when the 1st rate change is due). Conversely, an ARM might be detrimental if the rates change in the second year and the borrower intends to stay indefinitely, creating a situation where the monthly payment gradually increases to the point of not being affordable.

- Refinancing from a Fixed to an ARM: See above
- Discuss savings issues.
- Check affordability annual certifications are received (if applicable)

Once the review process is completed, the Counselor will determine the status of the subordination request, e.g., does or does not meet the city's subordination policy. If it is administratively determined that the city will subordinate, forward the Loan Comparison Worksheet and Division Routing sheet along with the completed Subordination Agreement to the CD Manager for review and approval. Once approved by the Community Development Manager, the Subordination Agreement will be signed by the Division Manager or designee and notarized by Counselor and the lender or the title company will be notified that the agreement is ready for pick up or mailing.

- HOAP will not subordinate to an interest only loan.
- HOAP will not subordinate to a non-owner occupant property.

PROCEDURE E

SECTION: Home Ownership Assistance Program (HOAP)
Down Payment/Closing Cost Assistance

SUBJECT: Month End Reports

SUMMARY: Procedure for month end reports.

POSITION: HOAP Sr. Counselor and Loan Processor

ACTION:

The following reports must be compiled:

- *HUD Year End Report (done every year)*
- *Open Files Report **
- *Details of Closed Loans by Fund**
- *Status of Funds**
- *Closed Loan Report**
- *City Manager's Memo**
- *Monthly Activity Report**
- *Monthly Payoff Report**

*Copies given to HOAP Manager

Retrieve Monthly Performance Sheets from all Counselors.

First of all, make sure that all of the previous months' loans and new intakes have been input into the system.

Double click on "Shortcut City Deve"

Select "HOAP"

Then click on "HOAP REPORTS"

And then click on "Preview Reports"

The First report to do is "HOAP NEW MONTHLY ACTIVITIES"

Select "HOAP New Monthly Activities"

(It will bring up a box asking for the beginning date)

Put in the 1st day of the previous month ...example (10/01/00)

Then click "OK"

(It will bring up another box asking for the ending date)

Put in the last day of the previous month... example (10/31/00)

Then click "OK"

Once the report appears on the screen, then click on print and print out the report.

From the "Monthly Performance Report", from each counselor, mark off each name from their list comparing all entries. Make sure that all entries from their Monthly Performance Reports are on this report. If they match GREAT, but if they don't, you will have to pull the file and enter the

missing file information. See entering a new File into the Computer. **IF** you have to make changes or enter a new file, then go back and re-print the report again as above. Close out of that report when finished, and it will take you back to the reports menu. The amount of new clients for the previous month gets written down on a sheet of paper. The outcome codes that begin with a 1 or 7 are new HOAP intakes, the outcome codes that begin with 3 are new foreclosure intakes, outcome codes that begin with 5 are new HECM's intakes, outcome codes that begin with 6 are new post-closing intakes, and the outcome codes that begin with 10 ~~9~~ are new Home of Our Own files. Write the totals from each category on a separate piece of paper and give to Loan Processor. (i.e. new HOAP's = __; new HECM's = __; new foreclosures = __).

The SECOND report you run are "HOAP OPEN REPORT"

Double click on "Shortcut City Deve"
Select "HOAP"
Then click on "HOAP REPORTS"
And then click on "Preview Reports"

PART 1

Click on "HOAP Open Report".

The report will come up. Print the report. Close out of HOAP Open Report, or minimize the screen.

PART 2

The 2nd part of this report involves updating the accumulative totals by month for the last page of this report.

Open Excel & select Open HOAP Report. This will open up the report we want to update.

From the HOAP Open Report that you just printed, go down the report and look for "Summary for 'Outcome Code'=18 (__ detail records). Put the number indicated in detail records in the bold box under the next available month, **OR** across from HOAP Target. Then hit enter. The cursor will go down to the next box.

Go back to the report and look further down the page or report for "Summary for 'Outcome Code'=38 (__ detail records). Put the number indicated in the next bold box **OR** across from Foreclosures. Enter.

Go back to the report and look further down the page or report and look for "Summary for 'Outcome Code'=78-81 (__ detail records). Put the number indicated in the next bold box **OR** across from HOAP o/s Target. Enter.

Go back to the report and look further down the page and look for "Summary for 'Outcome Code'= 10 (__ detail records). Put the number indicated in the next bold box **OR** across from HOOO. Enter.

TOTAL should be the "Grand Total" at the end of the "HOAP Open Report". Enter that # and hit enter.

The next figure you want to insert is the total from above of HOAP Target **AND** HOAP o/s Target. Add these 2 figures together and put that number in the box **OR** it's across from "HOAP'S". Enter.

The next figure you want to insert is the total from above of Foreclosures and PFS. Add these 2 figures together and put that number in the next box **OR** across from FCLS's. Enter.

The last number you need to enter is the numbers of HECM's that were counseled the previous month. This figure will come from the numbers that you wrote down from the HOAP NEW MONTHLY ACTIVITIES. Enter that number here and enter. Then print out this report. It goes as the last page of the "HOAP OPEN REPORT". This entire report gets photocopied and the original given to the HOAP Manager.

The third report you run is "Purchased without us"

Double click on "Shortcut City Deve"
Select "HOAP"
Then click on "HOAP REPORTS"
And then click on "Preview Reports"

Click on Purchased Without Us. It will bring up the box asking for the beginning date (enter the 1st day of the previous month) ...Example 10/01/00 then click OK
It will bring up the box again asking for the ending date (enter the last day of the previous month) .Example 10/31/00 then click OK. This will bring up the report. On the report look for the subtotals for each category. Look for "Summary for Outcome Code =" 16". Write down that # on a piece of paper. Further down the page look for "Summary for Outcome Code="76". Write down that # on the same piece of paper. The breakdown of those 2 codes should total the "Grand Total". Give these #'s that you wrote down to Loan Processor for the Manager's Memo. Click close to get out of the reports and the report menu.

Status of Funds

Report located in Kathy's computer in Excel.

Open Report by:

Double Click Excel Icon in Windows.
Click on File at the top.
Click on Open.
Click on Loan Ledger.
Click OK.

Input Data.

Get data from closed loan files. Input each file after they close.
Total Values at Bottom.
(See Sample)

Save your data by:

Click on File.
Click Save.

Print Report by:

Click on File.
Click on Print.
Click OK.

Close Report by:

Click on File.
Click on Close.
Click on File.
Click on Exit (to return to windows).

REPORTS ARE ON THE SHARED DRIVE

To Reach Shared Drive

Open Report By:

Double Click on Excel.
Go to F drive
Click on Department
Click on Neighborhood Services
Click on Community Development

(ALL HOAP REPORTS ARE OPENED THE SAME WAY)

Closed Loan Report

Click on HOAP Closed Loan Report
(If Macro screen appears, click on "enable macros")
Input Data By: (copying and pasting previous month's report)
Click on upper left square (to select entire document).
Click on Copy
Click on Paste (to paste previous months report).
Click again to "un" highlight selection
To remove gridlines click on Tools
Click on Options

Click on gridlines to “un” highlight
Click OK
Input current data over old data
Get data from the closing data sheets in Kathy’s binder

(See instructions on how to reach the shared drive.)

City Manager’s Memo

Click on HOAP 2017 Manager’s Memo
(If Macro screen appears, click on “enable macros”)
Input Data By: (copying and pasting previous month’s report)
Click on upper left square (to select entire document).
Click on Copy
Click on Paste (to paste previous months report).
Click again to “un” highlight selection
To remove gridlines click on Tools
Click on Options
Click on gridlines to “un” highlight
Click OK
Input current data over old data
Get data from the closing data sheets
Save and Print

(See instructions on how to reach the shared drive.)

Payoff Report

Get Payoff Report from Financial Analyst
Add up highlighted pay offs from each HOME, CHFA, CDBG loans
Go to HOAP 2017 Payoff
Add additional lines to follow present report
(highlight last line – click on insert – click on rows – add as many lines as needed)
Order of input-
 CDBG
 CHFA
 HOME

Input date, fund, last name, amount of payoff
Auto Sum to get total of all payoffs
Save and Print

(See instructions on how to reach the shared drive.)

Monthly Activity Report

Click on HOAP 2017 Monthly Activity Report

(If Macro screen appears, click on “enable macros”)
Update Header to current month
Input Data By: (copying and pasting previous month’s report)
Click on upper left square (to select entire document).
Click on Copy
Click on Paste (to paste previous months report).
Click again to “un” highlight selection
To remove gridlines click on Tools
Click on Options
Click on gridlines to “un” highlight
Click OK
Input current data over old data
Numbers for status of funds comes from current closed loan report
General items of interest and payoff numbers comes from payoff report
Update all numbers
Save and Print

Credit Reports

Request for Credit Reports are given to the Loan Processor, Housing Counselor or HOAP Manager.

PROCEDURE F

SECTION: Home Ownership Assistance Program (HOAP)
Down Payment/Closing Cost Assistance

SUBJECT: Home Ownership Seminar, One Saturday per Month (English & Spanish)

SUMMARY: Procedure for conducting monthly seminars (including Administrative duties)

POSITION: HOAP Counselor

ACTION:

For English & Spanish seminars, prepare seminar evaluations and 2 sign in rosters for AM and PM. HOAP participants sign both CHFA logs AM & PM sign-in sheets. (See **Exhibits Q & R**)

Contact participating Realtor and Lender for English & Spanish seminar. Advise them of approximate time of their presentation and when they should arrive. Remind them of their presentation guide, subjects to cover and materials to bring (**Exhibit S**).

A list is kept by the HOAP counselor of presenters who are interested in speaking at our seminars. Lenders must be CHFA approved to speak at the seminars. Each speaker must sign a Sponsor-Presenter agreement and follow the HOAP presenting guidelines.

One week prior to presentation, send presentation guide to speakers as another reminder.

Follow CHFA Agenda for the seminar (Exhibit T).

HOAP Counselor and guest presenters will use cordless microphone at all times during seminar.

One week before the seminar, contact property inspector, and City of Aurora representative from Neighborhood Support Division. One day before seminar, advise them of approximate time of their presentation and when they should arrive. Remind them of subjects to cover and materials to bring.

Follow power point presentation for the seminar (See **CHFA seminar material**).

Prepare seminar certificates for seminar participants who have attended the seminar. Distribute certificates at end of the seminar or mail them out if applicable. (EXAMPLES OF CERTIFICATE **EXHIBIT U**).

Administrative Duties – Performed by Loan Processor

The Loan Processor receives the sign in sheets & registration forms from the presenting Housing Counselor & verifies the participant attended both AM & PM sessions.

Data provided on the participant Certificate Registration Form is inputted by the Loan Processor into HOAP Access seminar database and in the Housing Counselor Online (HCO) database.

Loan Processor prints CHFA SEMINAR BILLING for each session from HOAP Access Seminar database and submits to HOAP Manager for signature. After signature, Loan Processor submits an invoice request to CD Financial Analyst for the total amount of both seminar sessions.

Once an invoice is provided, Loan Processor sends the monthly seminars invoice, CHFA SEMINAR BILLING, AM & PM sign in sheets and all sponsor-presenter information forms to Silvina Sansot at CHFA for payment (ssansot@chfainfo.com).

Loan Processor prepares a file for each English and Spanish seminars with a label indicating month and year. On the file, a six digit file number is issued (example: 180001 for January 2018). Last two digits of year, 00 and two digits of month.

Loan Processor inserts the seminar documents in its appropriate monthly seminar file and places the file in the drawer labeled Seminar Monthly Info.

In regards to the Neighborhood Stabilization Program (NSP) 2008, borrowers purchasing a NSP property must attend a full 8 hours of pre-purchase counseling to meet the NSP regulations. The 8 hours of training will consist of HOAP seminar, the one-on-one intake appointment with the pre-purchase counselor and the CHFA On-line home maintenance and pre-purchase course.

Procedure G

SECTION: Home Ownership Assistance Program (HOAP)

Down Payment/Closing Cost Assistance

SUBJECT: Lead Based Paint Inspection

SUMMARY: Lead Based Paint Inspections

POSITION: HOAP Lead Housing Counselor or HOAP Manager

ACTION:

- Included in the HOAP intake packet will be the Lead Based Paint Risk Assessment Notification form. HOAP counselors will review the form with the client and have client sign and date form. A brochure on the hazards of lead based paint will also be given to the buyer. A copy of the form will be given to the client for future reference.
- After review of the borrower's home inspection report, if the subject property is built prior to 1978, the Loan Processor will contact the buyer's agent to request a Lead Base Paint inspection to be scheduled IF we receive confirmation from the realtor verifying the seller has agreed to perform all HOAP inspection requirements prior to closing.
- Loan Processor will forward the buyer's agent a list of certified Lead Base Paint Risk Assessors to contact and schedule the inspection.
- When realtors or lenders call with questions, they should be told that the required tests are "Visual assessment with composite dust wipe sampling." HOAP staff should also explain that if there is "deteriorated paint on the interior of the home of 2 square feet or more on any one surface or 10% of any components total service area, then paint samples must also be collected and sent to the laboratory for analysis.
- Once the Certified Inspector/Risk Assessor generates the report, it is reviewed by the HOAP Manager or Lead Housing Counselor to determine if mitigation is required. HOAP covers the cost of lead testing for the prospective buyer and pays the Risk Assessor directly.
- Should there be cause for lead paint stabilization; HOAP will notify both realtors what steps should be taken by the seller of the property to mitigate the lead hazard. HOAP staff will then wait for a response from the selling agent involved. **(Starting August, 2017)** If the seller refuses to mitigate the lead hazard and seek clearance testing, HOAP will notify all parties that HOAP will not participate in the transaction due to the seller's refusal to repair the lead hazard.

PROCEDURE H

SECTION: Home Ownership Assistance Program (HOAP)
Foreclosure Prevention Program

SUBJECT: Foreclosure Prevention Counseling

SUMMARY: Procedures in accordance with HUD Handbook 7610.1, Rev-4, P.F.S. Guidelines Mortgage Letter 2008-43, published 12-24-08.

POSITION: Foreclosure Prevention Counselor

ACTION: **Training Protocol and Foreclosure Prevention (FP) Counseling**

TRAINING:

As soon as possible but no later than within 12-months of being hired, Foreclosure Prevention Counselors will obtain minimum training equal to no less than 30 hours of facilitated instruction including lecture, interactive, demonstration, on-line and case study. In addition, HOAP FP Counselors participate in extensive on the job training/coaching/mentoring with the program manager and senior housing counselor for at least 90 days prior to meeting one-on-one with clients.

Additional FP Counselor specialized training should be completed within 6 months and no later than one year to obtain competency under the National Industry Counseling Standards. Certification for FP Counseling, which includes passing a comprehensive examination which should be completed within 18 months of hire date, is entirely dependent on the availability of adequate funding in the agency budget. Continuing education of 10 hours per year will also be dependent on availability of training funds.

FP COUNSELING PROCEDURES:

- Counselor initially screens the foreclosure call to determine at what stage in the foreclosure process the client is in. Schedule face to face interview if necessary to assess the client's situation and review their current income and expenses.
- At the interview, counselor completes the intake form (See **Exhibit V**), client authorization forms HOAP, NFMC (if applicable), privacy policy, MHA screening form, action plan, budget form, DTI calculation and foreclosure counseling checklist. The client should bring proof of household income, 2 bank statements, most recent tax return, utility bill and information regarding their current monthly expenses.
- Create a file and write up interview notes on left side of file. Submit file to Loan Processor for data entry in HOAP Access & HCO databases.

Send email to admin staff to pull credit report.

- Based on the information obtained from the client, the following options may be attempted:

Forbearance Agreement with Lender:

- Contact Collections Department or Loss Mitigation Department with loan number, property address and client's last 4 digits of their social security number. Consider conference calls to lender if the authorization form is not showing on lender's system.
- Try to arrange for client to pay 1.25 to 1.33 payments per month until the loan is brought current.
- Ask for verification of any agreement in writing to formalize the forbearance agreed to.

Conventional Loan Modification HAMP or In-house:

This option may allow you to catch up on your loan by adding the missed payments into the loan amount and may extend the loan term out to 30 years or in rare cases 40 years. The interest rate may also be lowered to make the payment more affordable. You may qualify for this option if you have recovered from the financial problem and can show the lender that you can make the new payment. Making Home Affordable modifications may lower the current interest rate to as low as 2% to make the clients payment more affordable. In-house modifications may lower the interest rate to the current market rate to help the client keep the home and have a more affordable payment. The client budget should reflect a positive bottom line of at least + \$100 to \$200 dollars after all of the expenses are paid.

HUD Pre-Foreclosure Sale (PFS):

- If the client has an FHA mortgage and wishes to sell the property because they are at least 31 days behind on their house payment, they can apply for Pre-Foreclosure Sale Program. As of December, 2008 the application process is handled through the lender.
- Instruct the client to contact the lender's Loss Mitigation Department directly for approval of the FHA short sale option.
- Suggest ways for client to find a Realtor they can work with or provide a short sale realtor list of experienced realtors to work with. Provide at least five realtors for the client to interview.
- Do follow-up with realtor or client until property is sold.
- Close File.

FHA Loss Mitigation Options:

- If a client has a FHA loan on their home and becomes two months behind in their payments, they may apply through their mortgage company for loss mitigation assistance. HUD regulations require that all FHA approved lenders review all cases once a client falls two months behind. If the lender feels that the cause of the delinquency was beyond the control of the client, the lender **may** offer loss mitigation tools to assist the client. Although it is not mandatory that the lender offer assistance under HUD regulations, there is financial incentive paid by HUD to the lender if they decide to offer assistance. The client's budget goal should show some positive income after all of the monthly expenses are paid.

- Loss Mitigation tools include: Forbearance Agreement, Refinance, Loan Modification, FHA-HAMP, Partial Claim, Pre-foreclosure Sale, and Deed in Lieu of foreclosure.
- When a client calls for foreclosure assistance and are two months behind with an FHA loan, instruct them to call their lender and request a Loss Mitigation packet. Many times lenders may require that financial information is given over the phone to pre-qualify the client for assistance programs. If the packet is mailed to the client they should fill out the information and return the packet with the requested documentation ASAP to the lender. If they have questions or need help they should call HOAP for an appointment to complete the application packet and copy the necessary documentation that is sent to the lender.
- If a client is having trouble with the Customer Service Department at the lender, advise them to ask for a supervisor. If the supervisor will not refer them to the Loss Mitigation Department for the application packet, it may be a problem lender and the client should be referred to HUD Loss Mitigation at 1-877-622-8525 to lodge a complaint and get a ticket number. Client will need their FHA case number when they call HUD. This only applies to FHA loans.

V.A. Modification:

- Obtain client's V.A. Loan Number and call the Veteran's Administration to ask for a Modification Application. Call the VA Servicing Center at 1-800-319-9446 and have the last 3 digits of the VA loan number available.
- Counsel client on the Modification Program and assist client in filling out Modification Application. As of 2008, some FHA Loss Mitigation options may be used on VA loans as well.

V.A. Short Sale:

- Call the Veteran's Administration with V.A. loan number for correct technician to speak with for approval of a short sale.
- Have client call the technician and request financial forms and help client prepare forms. Provide client with short sale realtor list if they don't have a realtor in mind.
- Follow up with client until final decision is reached and property is sold.
- Close file.

Deed-In-Lieu of Foreclosure:

- Help the client compose a hardship letter asking the lender to accept a Deed-In-Lieu of foreclosure.
- Wait for response. Follow up until lender makes decision. Close file.

• **Foreclosure or Bankruptcy:**

- If all other options fail to save the home from going to foreclosure, counselor must explain the foreclosure process and discuss Chapter 13 or Chapter 7 bankruptcy options with the client. Refer to bankruptcy attorney referral list or to Colorado Bar Association.
- Complete monthly follow up until client's situation is finalized. Close File.

PROCEDURE I

SECTION: Home Ownership Assistance Program (HOAP)
Home Equity Conversion Mortgages (HECM)

SUBJECT: Home Equity Conversion Mortgage Counseling

SUMMARY: Home Equity Conversion Mortgages, in accordance with HUD Handbook 4235.1

POSITION: Reverse Equity Mortgage Counselor

ACTION:

- Client contacts counselor and requests information on Reverse Equity Mortgages.
- An intake sheet is completed (See **Exhibit W**) over the phone along with taking down the applicants' birthdays and estimated property value.

Counselor sets an appointment to meet with the client, either in the office, over the phone or at client's home.

In preparation for the meeting, the following is gathered or prepared, prior to:

- Use Your Home to Stay at Home booklet
- 2 sets of the program guidelines (1 for counselor, 1 for client)
- Reverse Mortgage Eligibility Checklist
- Reverse Mortgage Counseling Checklist
- Pull our financial worksheet
- Input the information into IBIS program to determine what the client is eligible for, i.e., monthly payments for life, monthly payments in smaller term and the line of credit available. Photo 1 copy of these printouts for the client.
- Counselor to mail or email at least 1 week prior to closing the cover sheet confirming scheduled appointment, Use Your Home to Stay at Home booklet, Financial Interview Tool "Fit" questionnaire, Monthly Income & Expense Worksheet, Benefits Check-Up questionnaire (if applicable) and a Reverse Mortgage Analyst Report.

At the Consultation, the client(s) is:

- Informed why you are presenting the program to them
- Client signs Authorization of Counseling Services
- Client completes Equal Housing Opportunity Form
- Client initials receipt of City of Aurora Privacy Policy
- Counselor to obtain Monthly Income & Expense Worksheet "Fit" questionnaire
- The first 2 pages of the financial form are completed.
- Counselor to present the Program Guidelines.
- Complete explanation of the computer printouts and how much money is available to the client.
- Answer any questions the client may have, or take a note of the question and inform them you will find out the answer and get back to them with the answer.
- Counselor inputs the Financial Interview Tool questionnaire in the IBIS program and prepares certificate of HECM Counseling in FHA Connection and prints 2 copies. Client signs both copies of certificate. They keep one copy and the file has 1 copy.

- Client is given a copy of the Financial Interview Tool results.
- The Benefit Check-Up questionnaire is optional unless the client is disabled. The data collected on the questionnaire is inputted into the IBIS program and the results are provided to the client prior to finalizing the appointment.
- Once counseling is completed, a file is made with an orange label with client's first three letters of last name, first letter of client's first name and date they were in for counseling.

On the left side of the file should be:

- Counseling Certificate (top)
- Page 2 Eligibility Checklist
- Page 3 Counseling Checklist

On the right side of the file should be:

- The original intake sheet
 - The financial sheets completed at counseling
 - Financial Interview Tool questionnaire
 - Benefits Check-Up questionnaire (if applicable)
- The file is closed out as a "55" and input into HOAP Access & HCO databases.

PROCEDURE J

Community Development Division
City of Aurora
Conflict of Interest Policy

APM NO. 3-22, issued March 5, 1997 and revised August 28, 2007 defines a conflict of interest as “any interest, direct or indirect, and in particularly financial, which may appear to or be construed to imply that an employee would or might benefit from his or her position with the City. This applies to any transaction between an employee and any outside business, organization, or individual, including a fellow employee. Some examples:

- To give or receive anything of value which could be construed as a bribe, kickback or payoff;
- To accept additional compensation of any sort of services or time for which the employee is being paid by the City;
- To use or reveal to anyone, without appropriate authority or specific authorization to do so, confidential information concerning the City including its operation and personnel;
- To use or permit others to use employees, vehicles, materials, computers, software, funds or other City equipment or property for personal purposes without receiving prior approval from an immediate supervisor and Department Director, Assistant or Deputy City Manager;
- To have a spouse or relative who owns and/or operates a business conduct any business with the City unless the City Attorney’s Office has rendered a determination that the business relationship is not a conflict of interest for a City employee;
- To serve as an officer, director, or consultant of, be a principal owner of, or receive any form of income in these capacities from any enterprise doing business with the City.

Although the APM says that the examples cited above are not all inclusive, the general intent of the APM is clear in that a City employee must not benefit directly as a result of his/her employment with the City. Any City employee who meets all of the eligibility criteria of the federal programs administered by Community Development is eligible so long as that employee has no connection to the administration of Community Development programming.

Appearance of Impropriety: Any activity performed by an employee where the duty owed to the citizens of undivided loyalty to carry out their best interests is compromised or might appear to be compromised.

HUD Regulations, 24 CFR Part 85, Section 85.36(b)(3), “Code of Conduct” and 24 CFR Part 570.489(h), Conflict of Interest” addresses this issue as follows:

“No employee, officer or agent of the grantee or sub-grantee shall participate in selection, or in the award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when:

- (Code of Conduct) The employee, officer or agent; any member of his immediate family; his or her partner; or an organization which employs or is about to employ, any of the above, has a financial or other interest in the firm selected for award. The grantee’s or sub-grantee’s officers, employees or agents will neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors or parties to sub-agreements.
- (Conflict of Interest) Except for eligible administrative or personnel costs, the general rule is *that no persons who exercise or have exercised any functions or responsibilities with respect to CDBG activities assisted under this subpart or who are in a position to participate in a decision making process or gain inside information with regard to such activities may obtain a financial interest or benefit from the activity, or have an interest or benefit from the activity or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds there under, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.*

The Community Development Division has written Policies and Procedures in place that address the conflict of interest provisions, citing both the above referenced APM NO. 3-22, as well as HUD's notice CPD 98009, that specifically requires a written exception when the applicant is a staff member of Community Development, a Senior Management staff member, a member of the Citizen's Advisory Committee on Housing and Community Development, an elected official such as a City Council member, or a family member of any of the above.

Procedure K

Subject: HOME Recapture Provisions for HOAP Loans

- The original 2nd "Deed of Trust" with Exhibit A (HOME Fund Affordability Agreement), are left with the title company for notarization and filing with the county. After filing, it is mailed to the Community Development office and is to be placed in the office safe. A copy of the recorded Deed of Trust is also kept in the file.

- Copies of HOAP Note, Deed of Trust with Exhibit A (HOME Fund Affordability Agreement), Truth in Lending Statement and First Mortgage Note, Deed of Trust, Closing Disclosure (CD) Statement, and HOME Voucher Request are placed in the client's file in the Closing Data & Legal Documents section.
- After the accounting department draws down funds from the HUD IDIS Funding System after the project is closed, the HOAP processor / administrative assistant will notify each borrower via regular mail what the appropriate affordability period is and when it will end. The letter will remind borrowers that they must live in the property the entire affordability period or sell the property so that City of Aurora, Community Development Division may recapture loan funds based on net proceeds.
- Every year during the 5-year HOME affordability period, the Community Development Division will mail to the principle residence certification documents to all HOME assisted borrowers to verify that they are still occupying the property. These documents must be returned to Community Development in the postage paid envelopes provided or be considered in non-compliance with HUD HOME Regulations.
- When a homeowner is non-compliant with the initial principle residency certification mailing, it is necessary the 2nd Demand Notice is sent 1st Class mail with return postage paid allowing 30 days for the homeowner's response. If there is no response to the second mailing, the 3rd Notice of Demand is sent certified mail (return receipt requested) offering another 30 day response period to the homeowner.
- If there is no client response to the 3rd Demand Notice, notate the file & in HOAP Access database system of non-compliance. In this instance, a request for a Subordination will not be granted.

Several points must be emphasized to clarify certain aspects of the HOME funding requirements:

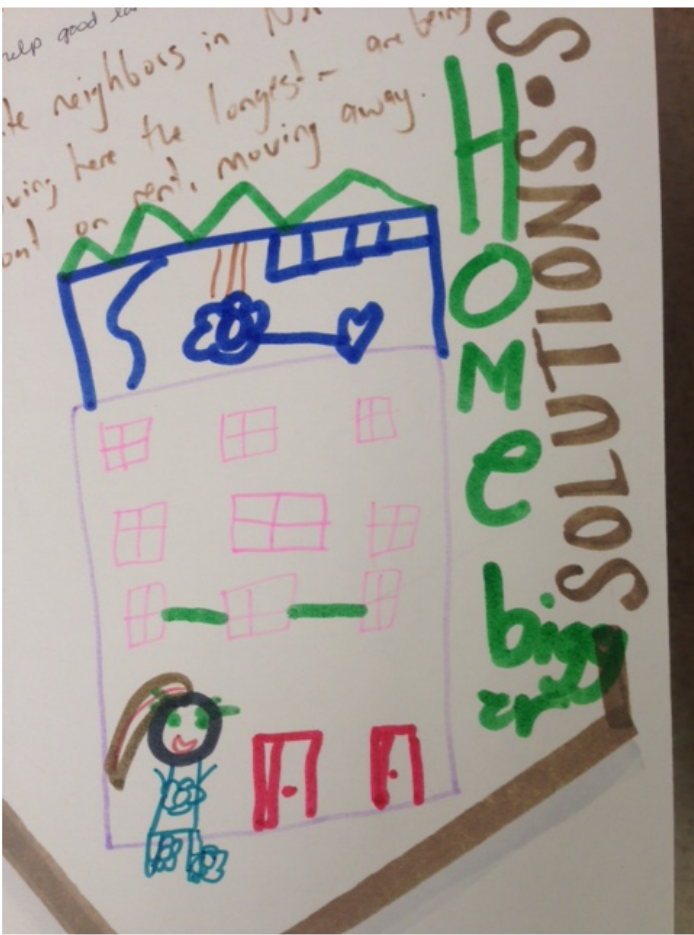
- Every HOME-funded loan requires that the borrower must reside in the property until the 5-year HOME affordability period has expired or sell property.
- The 5-year HOME affordability period begins when the HOME funds are drawn down from the U.S. Treasury after completion of the loan funding and the project is closed out, not from the date of the loan closing. HOAP will issue a letter after closing specifying the exact dates of the affordability period.
- During the 5-year HOME affordability period, the borrower must submit to annual occupancy verification.
- If the owner leaves the property during the 5-year HOME affordability period, or if the borrower fails or refuses to provide the annual occupancy verification, they would be considered in non-compliance and would be required to **move back into the property** or **sell the property** so that the City of Aurora may recapture the loan subject to available Net Proceeds.
- Net Proceeds = Sales Price minus Superior non-HOME debt minus Closing Costs
- Net proceeds, if any available, will be accepted as a final settlement of the HOME debt.
- If determined that a property is non-owner occupied, Counselor will contact the homeowner to require they either sell the property or establish a re-payment plan.

SECTION IV.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

DENVER, AURORA, BOULDER



FINAL REPORT

Final Report

December 2018

Denver Aurora Boulder Analysis of Impediments of Fair Housing Choice

Prepared for

City of Aurora
City of Boulder
Boulder County
City and County of Broomfield
City and County of Denver
City of Longmont
Aurora Housing Authority
Boulder Housing Partners
Denver Housing Authority
Longmont Housing Authority

Prepared by

BBC Research & Consulting (now Root Policy Research)
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EXECUTIVE SUMMARY

Regional Analysis of Impediments to Fair Housing

This document summarizes the primary findings from the Denver-Aurora-Boulder Regional Analysis of Impediments to Fair Housing Choice (Regional AI) conducted in 2017 and 2018. It is tailored to the analysis and findings for the City of Aurora.

Study Background

In 2017, the City of Aurora, the Boulder Broomfield Regional HOME Consortium (Consortium), the City and County of Denver, and area housing authorities agreed to collaborate to fulfill a requirement by the U.S. Department of Housing and Urban Development (HUD) to analyze barriers to housing choice. This fair housing analysis is required of any city, county, and state receiving certain HUD funding, including such sources as Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME). HUD encourages regional collaboration on these studies, recognizing that housing challenges do not end at jurisdictional borders—and that regional partnerships are key to addressing housing needs and sustaining economic growth.

The overall goal of the Regional AI approach is to help communities analyze challenges to fair housing choice and establish goals and priorities to address fair housing barriers. A secondary goal is to help communities move toward an economic opportunity philosophy when making planning and housing policy decisions.

The cities and counties included in this study are the City of Aurora, the City of Boulder, Boulder County, the City and County of Broomfield, the City and County of Denver, and the City of Longmont. The lead entity is the City and County of Denver. Five housing authorities also participated in the study: Aurora Housing Authority, Boulder Housing Partners, Boulder County Housing Authority, Denver Housing Authority, and Longmont Housing Authority.

Approach: Home is More Than Housing

Historically, housing policies and programs have focused on creating new units, with limited regard to location. This approach has shifted in recent years, as a result of legal challenges and research showing that where housing is located has a lasting effect on the economic outcomes of residents—and, consequently, the economic health of neighborhoods and entire communities.

Many studies have found long-term public savings related to improvements in housing stability and economic inclusion. For example,

- Dr. Raj Chetty’s well known Equality of Opportunity research found positive economic returns for adults who had moved out of high poverty neighborhoods when they were children. The gains were larger the earlier children moved.¹
- A companion study on social mobility isolated the neighborhood factors that led to positive economic mobility for children. Children with the largest upward economic mobility were raised in neighborhoods with lower levels of segregation, lower levels of income inequality, higher quality schools, and greater community involvement (“social capital”).
- A 2016 study by the National Bureau of Economic Research (NBER) found positive economic and social outcomes for children raised in publicly subsidized housing in all types of neighborhoods.² Another research project had a slightly different conclusion. A study by researchers at Johns Hopkins University found that when assisted housing is located in higher quality neighborhoods, children have better economic outcomes. The study also concluded that because low income African American children are more likely than low income white children to live in assisted housing, the location of assisted housing in poor quality neighborhoods has a disproportionate impact on African American children’s long term economic growth.³

An economically inclusive approach to fair housing planning is also consistent with the “affirmatively furthering fair housing” clause in the Federal Fair Housing Act (FHA). The FHA requires that HUD programs and activities be administrated in a manner that affirmatively furthers the intent of the Act. Federal courts have interpreted this to mean doing more than simply not discriminating: The obligation also requires recipients of federal housing funds to take meaningful actions to overcome historic and current barriers to accessing economically stable communities.

“Home” encompasses a variety of factors—good neighbors, safe environments, quality schools, social services, jobs, and transportation—all of which affect the economic health of a neighborhood and its residents.

Role of jurisdictions in closing disproportionate housing and economic opportunity gaps. Local jurisdictions can play a critical role in addressing disproportionate housing needs. On the programmatic side, local jurisdictions make decisions about how to distribute housing and community development funds among various programs. More significant is governmental influence over the built environment. To ensure that direct and indirect government activities and influence is equitable, local governments should:

- Regularly complete analysis of the characteristics of the beneficiaries of housing and service programs relative to the income-adjusted resident population.

¹ <http://www.equality-of-opportunity.org> and http://www.equality-of-opportunity.org/images/mto_exec_summary.pdf

² <http://www.nber.org/papers/w19843.pdf>

³ <https://jhu.pure.elsevier.com/en/publications/race-and-assisted-housing>

- Require that developers receiving public subsidies (monetary or in the form of density bonuses and fast track review) use affirmative fair housing marketing practices;
- Monitor how public sector investments can contribute to economic changes in neighborhoods, possibly accelerating displacement of low income residents; and
- In making planning decisions, be aware of how the built environment communicates inclusiveness or exclusiveness to different types of residents.

Civil Rights History

The State of Colorado and many cities were pioneers on several civil rights fronts. In 1951, Colorado became the third state in the nation to create a civil rights agency—now the Colorado Civil Rights Division. Around the same time (1947), Denver’s mayor established one of the first city-level civil rights commissions. Colorado was also one of the first states to pass a civil rights law.

The State’s employment and housing protections exceed those of the Federal Fair Housing Act by covering marital status and sexual orientation (including transgender status), in addition to race, color, religion, creed, national origin/ancestry, religion, sex/gender, disability, and familial status (federal protected classes).

These extra protections are typical. Many neighboring states also offer Source of Income protections to ensure that residents living on fixed incomes (seniors and persons with disabilities), mothers receiving child support, and voucher holders are not denied housing because of these income supplements:

- The Utah Fair Housing Act prohibits discrimination based on source of income (as well as sexual orientation and gender identity);
- North Dakota protects against “receipt of public subsidies” (akin to source of income);
- The State of Oregon offers protections to honorably discharged veterans/military status and source of income. Source of income was originally intended to protected benefit income, such as social security income or disability income. This was extended in 2014 to include Section 8 vouchers and other forms of rental subsidies.

Community Engagement

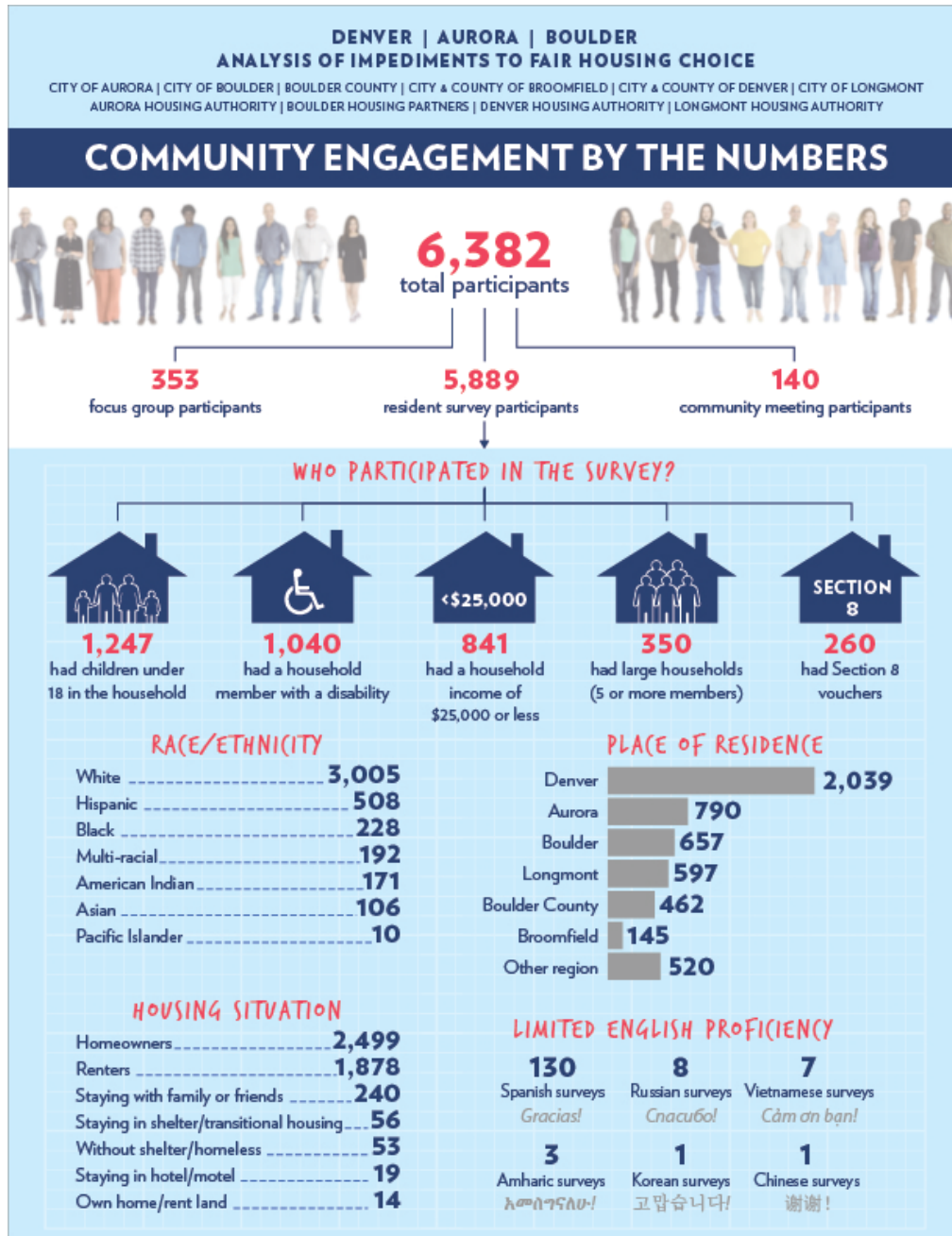
The Regional AI included a significant amount of community participation. Methods of engagement included a resident survey; resident focus groups; stakeholder focus groups; presentations at community meetings; and policymaker briefings.

Findings from this outreach, in addition to the quantitative analysis conducted for the study, were used to identify impediments and determine the highest priority fair housing issues.

The survey was available online and in hard copy form, distributed through social service networks, ethnic restaurants, day labor sites, and churches in Aurora. Altogether, nearly 800 surveys were received from residents living in Aurora.

Aurora stakeholders were also represented in focus groups to discuss challenges in housing, employment and job training, and access to opportunity for persons with disabilities.

The figure below summarizes this extensive engagement.



Summary Findings

The research in the Regional AI covered:

- Racial, ethnic and economic segregation,
- Disproportionate housing needs, including the use of publicly-assisted housing,
- Access to quality schools, employment opportunities and job training, transportation, and environmentally healthy communities;
- Access to housing and community amenities by residents with disabilities, and
- Enforcement of fair housing laws and fair housing resources.

The core analysis is captured in the Regional AI. Separate, customized analyses were prepared for the participating partners (Aurora, Denver, Boulder Broomfield Regional Consortium).

Racial and ethnic segregation. According to a common measure of segregation used in fair housing studies (the dissimilarity index, or DI), Aurora has low levels of segregation, except for residents of Hispanic descent. As the city has grown, segregation has increased for all resident groups, as shown in the figure below.

The DI measures the degree to which two distinct groups are evenly distributed across a geographic area, usually a county. DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. The DI represents a “score” where values between 0 and 39 indicate low segregation, values between 40 and 54 indicate moderate segregation, and values between 55 and 100 indicate high levels of segregation.

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**Figure ES-1.
Racial/Ethnic Dissimilarity Trends, Regional AI Jurisdictions, 1990 to 2013**

DI Comparison	City of Aurora				City and County of Denver			
	1990	2013	2013 Level	1990-2013 Trend	1990	2013	2013 Level	1990-2013 Trend
	Non-White/White	21.07	34.82	Low	Significant Increase	50.92	52.59	Moderate
Black/White	28.39	32.24	Low	Increase	67.10	59.48	High	Decrease
Hispanic/White	15.55	42.48	Moderate	Very Significant	54.58	57.92	High	Stable
Asian or Pacific Islander/White	17.07	23.94	Low	Significant Increase	31.17	39.84	Low to Moderate	Increase
City of Boulder								
	1990	2013	2013 Level	1990-2013 Trend	1990	2013	2013 Level	1990-2013 Trend
Non-White/White	24.55	29.40	Low	Increase	24.85	34.60	Low	Significant Increase
Black/White	22.93	27.66	Low	Increase	29.93	24.75	Low	Decrease
Hispanic/White	24.00	32.55	Low	Significant Increase	30.96	43.27	Moderate	Significant Increase
Asian or Pacific Islander/White	31.60	32.82	Low	Stable	27.89	32.63	Low	Increase
Boulder County								
	1990	2013	2013 Level	1990-2013 Trend	1990	2013	2013 Level	1990-2013 Trend
Non-White/White	24.55	29.40	Low	Increase	24.85	34.60	Low	Significant Increase
Black/White	22.93	27.66	Low	Increase	29.93	24.75	Low	Decrease
Hispanic/White	24.00	32.55	Low	Significant Increase	30.96	43.27	Moderate	Significant Increase
Asian or Pacific Islander/White	31.60	32.82	Low	Stable	27.89	32.63	Low	Increase
City of Longmont								
	1990	2013	2013 Level	1990-2013 Trend	1990	2013	2013 Level	1990-2013 Trend
Non-White/White	24.55	29.40	Low	Increase	21.80	30.25	Low	Significant Increase
Black/White	22.93	27.66	Low	Increase	18.90	21.15	Low	Increase
Hispanic/White	24.00	32.55	Low to Moderate	Significant Increase	24.87	36.74	Low to Moderate	Significant Increase
Asian or Pacific Islander/White	31.60	32.82	Low	Increase	19.02	34.60	Low	Significant Increase

Source: HUD AFFH Data and Mapping Tool, version 4.

Economic segregation. According to a recent Pew Research Study, residential income segregation increased substantially in the Denver metro area between 1980 and 2010.⁴ By 2010, the Denver metro area had the 5th highest residential income segregation among the nation's 30 largest metro areas.⁵

Communities with high levels of income segregation also tend to have low rates of upward mobility. Among the largest 100 metro areas, Denver ranks 40th for upward mobility of below-median income families.⁶

Economic mobility also varies considerably within metro areas, sometimes at the neighborhood level. And the residents living in neighborhoods with limited economic access are often racial and ethnic minorities. HUD has developed a framework to examine economic opportunity at the neighborhood level, beginning with an assessment of "racially or ethnically concentrated areas of poverty, also known as R/ECAPs." These are neighborhoods in which there are both racial concentrations and high poverty rates.

HUD's definition of an R/ECAP is:

- A census tract that has a non-white population of 50 percent or more (majority-minority) or, for non-urban areas, 20 percent, AND a poverty rate of 40 percent or more; OR
- A census tract that has a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the county, whichever is lower.

The 40 percent poverty threshold is based on research identifying this to be the point at which an area becomes socially and economically dysfunctional. Conversely, research has shown that areas with up to 14 percent of poverty have no noticeable effect on community opportunity.⁷

Households within R/ECAP census tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. By definition, a significant number of R/ECAP households are financially burdened, which severely limits housing choice and mobility. The added possibility of racial or ethnic discrimination creates a situation where R/ECAP households are likely more susceptible to discriminatory practices in the housing market. Additionally, due to financial constraints and/or lack of knowledge (e.g., limited non-English information and materials); R/ECAP households encountering discrimination may believe they have little or no recourse, further exacerbating the situation.

It is very important to note that R/ECAPs are not areas of focus because of racial and ethnic concentrations alone. Many R/ECAPs, while not economically wealthy, are rich in culture,

⁴ The region in this study was defined as "Denver-Broomfield."

⁵ <http://www.pewsocialtrends.org/2012/08/01/the-rise-of-residential-segregation-by-income/>

⁶ <http://www.equality-of-opportunity.org/>

⁷ The Costs of Concentrated Poverty: Neighborhood Property Markets and the Dynamics of Decline." In Nicolas P. Retsinas and Eric S. Belsky, eds., *Revisiting Rental Housing: Policies, Programs, and Priorities*. Washington, DC: Brookings Institution, 116–9.

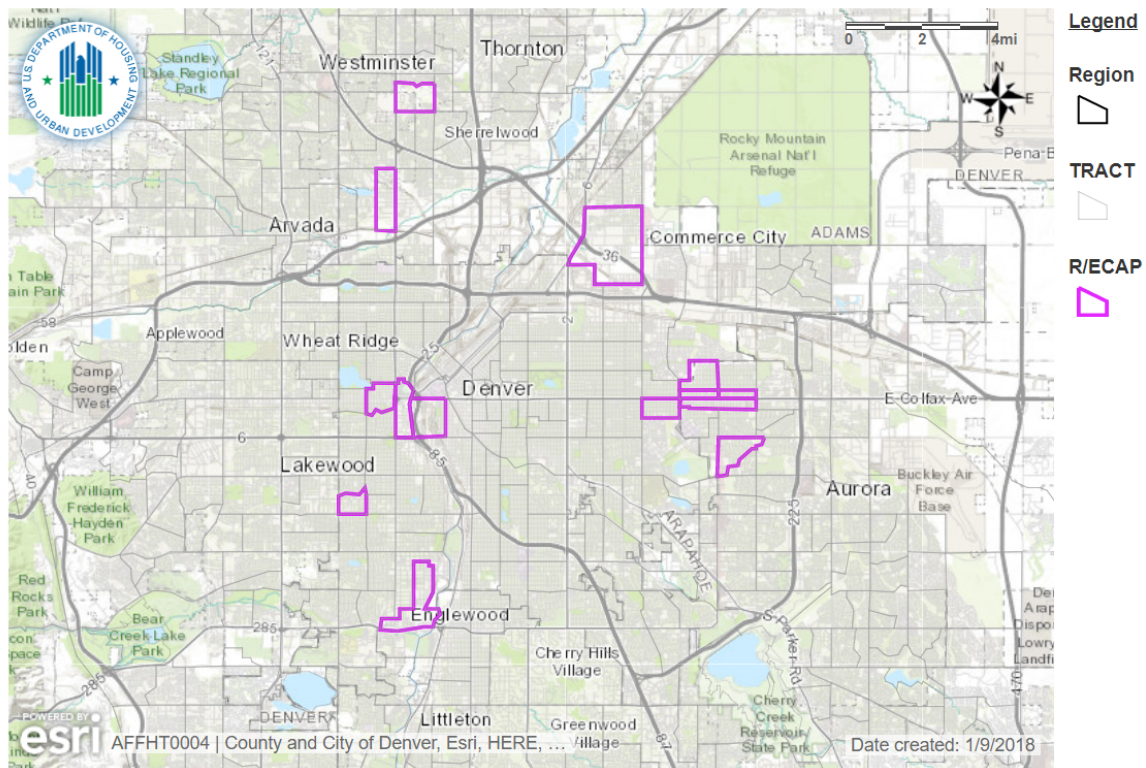
diversity, and community. R/ECAPs are meant to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity.

In the region, as of 2013, there were 14 neighborhoods, or census tracts (just 2% of all census tracts), with poverty rates exceeding 40 percent. Nearly two-thirds (64%) of residents living in high-poverty census tracts are racial or ethnic minorities. This is nearly twice the proportion of racial or ethnic minorities in the region overall, meaning that racial and ethnic minorities are *significantly disproportionately likely* to live in high-poverty neighborhoods.

These 14 census tracts are also R/ECAPs. Among the 58,277-people living in R/ECAPs, 38 percent are in Aurora, 34 percent are in Denver, and the remaining residents are in Westminster, Federal Heights, Commerce City, Englewood, or Sheridan.

Figure ES-2 shows where the region's R/ECAPs are located according to HUD's latest data.

Figure ES-2.
Locations of R/ECAPs, Denver-Aurora-Boulder Region, 2013



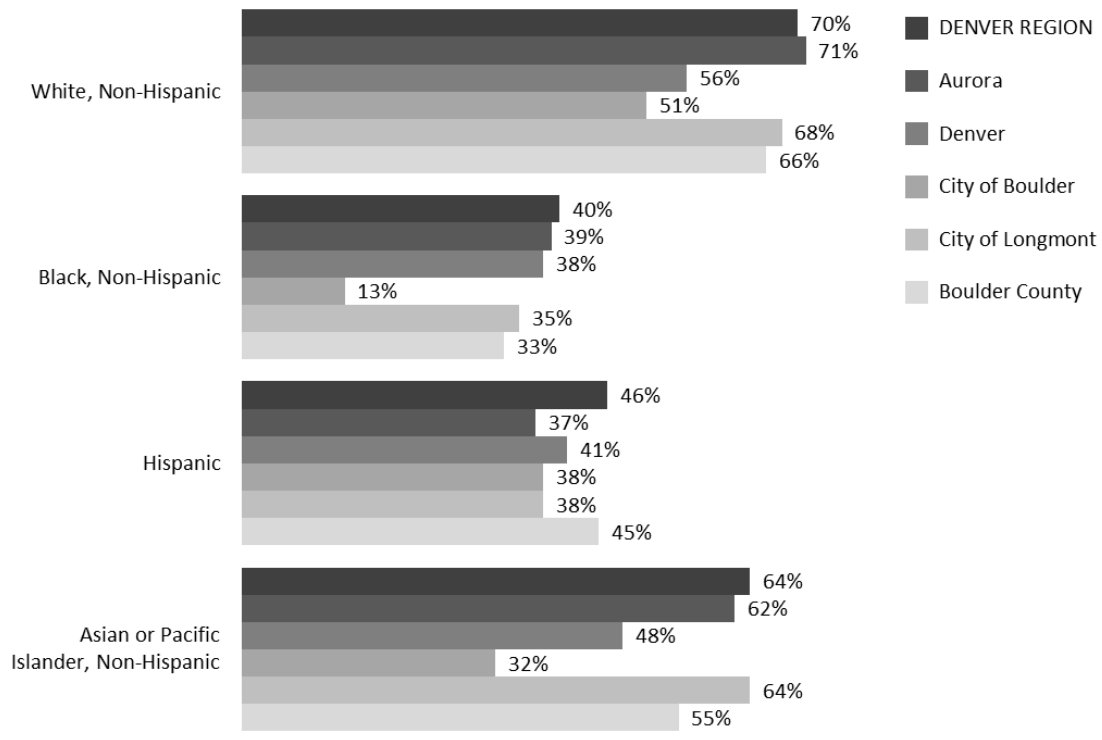
Source: HUD AFFH Data and Map tool and BBC Research & Consulting.

In the region as a whole, Hispanic and Black/African American residents have the highest shares of residents living in R/ECAPs: 6 percent of Hispanic and 5 percent of Black/African American residents live in R/ECAPs, compared to 1 percent of white, non-Hispanic residents.

Disproportionate housing needs. Differences in housing needs by race and ethnicity can be assessed by differences in homeownership, access to publicly-assisted housing, and the experience finding housing (captured by survey results and discussed in a later section).

Figure ES-3 shows how homeownership rates differ among the participating jurisdictions. Aurora very closely resembles the region overall, except for Hispanic residents, who have a lower homeownership rate in Aurora than in the region overall.

Figure ES-3.
Differences in Homeownership, by Race and Ethnicity, 2016



Source: HUD AFFH Data and Mapping Tool, version 4 and 2015 5-year ACS (Broomfield only).

The survey conducted for this study also asked residents about disproportionate needs. Aurora ranked the same as the region in the housing challenges measured by resident responses to the AI survey, except for barriers to accessing rental units created by criminal history. Similarly, Aurora residents with disabilities did not indicate their barriers were higher or lower than residents in the region overall.

The only area where Aurora “stood out” with respect to disproportionate needs was associated with displacement. Displacement caused by investors selling rental units was significantly higher than in the region and in any other jurisdiction. Similarly, 46 percent of Housing Choice Voucher holders in Aurora said they are worried their landlord will stop accepting vouchers. Although this is slightly lower than the region overall (49 percent), it is much higher than in City of Boulder, which has very high rental costs overall, but a strong supply of subsidized housing. This concern likely reflects the diminishing stock of affordable rentals, particularly those that fall within HUD’s fair market rent range, in Aurora.

Figure ES-4.
Displacement Experience and Reasons for Displacement by Jurisdiction Overall, Current Renters and Those Precariously Housed or Homeless

Place of Current Residence	Percent Displaced	Reason for Displacement		
		Rent Increased More Than I Could Pay	Evicted: Behind on the Rent	Landlord Selling Home
Aurora	20%	40%	5%	30%
Renters	42%	40%	5%	35%
Precariously housed/homeless	26%	30%	30%	13%
Denver	19%	43%	6%	18%
Renters	30%	44%	4%	20%
Precariously housed/homeless	49%	43%	17%	6%
Boulder	18%	31%	6%	17%
Renters	24%	33%	3%	12%
Precariously housed/homeless	49%	26%	17%	13%
Boulder County	20%	45%	7%	12%
Renters	21%	51%	7%	9%
Precariously housed/homeless	34%	35%	18%	17%
Broomfield	21%	50%	0%	12%
Renters	46%	42%	0%	16%
Precariously housed/homeless	-	-	-	-
Longmont	16%	30%	10%	13%
Renters	28%	27%	12%	12%
Precariously housed/homeless	46%	44%	17%	0%
Region	19%	41%	6%	19%
Renters	30%	41%	5%	20%
Precariously housed/homeless	43%	42%	17%	8%

Note: Displacement did not necessarily occur within current community of residence. - Sample size too small to report.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Access to economic opportunity. HUD has developed opportunity indices for education, employment, transportation, and low- poverty environments to facilitate an access to opportunity analysis. The indices allow comparison of opportunity indicators by race and ethnicity, for households below and above the poverty line, among jurisdictions, and against the region.

To interpret the indices in the tables, use the rule that a higher number is always a better outcome. The index should not be thought of as a percentage—but as an “opportunity score.”

Aurora's opportunity indicators table is shown in Figure ES-5. The table shows that:

- Residents of Hispanic descent, especially those living below the poverty level, have very low access to high economic opportunity environments. This is also true of Native American residents and, lesser so, for African American residents.
- African Americans in Aurora are equally as unlikely to live in high opportunity environments in Aurora as they are in the region. This is not true of other races and ethnicities, which have better access regionwide than in Aurora.
- School proficiency is low in Aurora relative to the region, for all residents and residents living below poverty. Similarly, residents in Aurora have lower access to neighborhoods where residents have high levels of labor market engagement.
- Aurora residents have equivalent or higher access to transit and low cost transportation than residents region wide. Yet Aurora residents live farther away from employment centers, suggesting that expansion of employment centers within Aurora would improve job proximity and create even better access to transit and lower transportation costs.

Figure ES-5.
Table 12 — Opportunity Indicators, by Race/Ethnicity, Aurora

(Aurora, CO CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index
Total Population						
White, Non-Hispanic	57.42	32.21	57.73	67.99	72.59	38.54
Black, Non-Hispanic	43.12	20.83	47.33	72.76	78.03	40.25
Hispanic	35.32	18.97	40.23	72.38	78.26	39.54
Asian or Pacific Islander, Non-Hispanic	52.67	30.04	55.55	69.44	74.45	39.55
Native American, Non-Hispanic	44.89	23.23	46.74	71.39	76.31	38.08
Population below federal poverty line						
White, Non-Hispanic	41.75	24.77	48.46	73.47	78.93	43.32
Black, Non-Hispanic	30.01	17.14	36.74	75.23	81.64	42.83
Hispanic	21.64	15.82	32.47	74.23	81.12	41.06
Asian or Pacific Islander, Non-Hispanic	40.50	21.06	42.33	73.46	78.72	44.88
Native American, Non-Hispanic	16.24	20.62	30.09	75.45	82.83	43.49
(Denver-Aurora-Lakewood, CO) Region						
Total Population						
White, Non-Hispanic	68.47	57.55	74.31	63.05	67.30	49.30
Black, Non-Hispanic	44.09	30.32	55.79	72.68	76.40	44.77
Hispanic	42.09	29.55	49.02	69.90	74.65	47.58
Asian or Pacific Islander, Non-Hispanic	63.29	50.69	70.22	66.99	70.36	46.86
Native American, Non-Hispanic	51.51	41.11	59.38	67.61	72.95	50.72
Population below federal poverty line						
White, Non-Hispanic	52.02	45.11	64.50	69.55	76.06	53.73
Black, Non-Hispanic	29.40	24.11	45.55	75.85	81.44	49.28
Hispanic	27.19	20.38	39.84	72.86	79.49	49.24
Asian or Pacific Islander, Non-Hispanic	50.42	42.13	59.60	70.11	75.30	51.03
Native American, Non-Hispanic	31.73	30.36	49.22	74.12	82.04	52.85

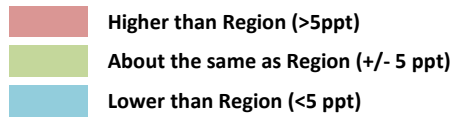
Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA.

Top Challenges faced by Residents

The top housing challenges faced by Aurora residents, and compared to other jurisdictions, are summarized in the table below. Overall, Aurora residents report similar challenges as residents in the region overall, except for the effect of criminal backgrounds and evictions on the ability to find rental units.

Figure ES-6.
Top 10 Housing Challenges Experienced by Residents



Percent of Residents Experiencing a Housing Challenge	Aurora	Denver	Boulder	Boulder County	Broomfield	Longmont	Region
I worry about my rent going up to an amount I can't afford	73%	74%	73%	70%	100%	73%	74%
I want to buy a house but can't afford the down payment	68%	69%	62%	40%	79%	58%	64%
I have Section 8 and I am worried my landlord will stop accepting Section 8	46%	71%	16%	12%	-	26%	49%
I worry that if I request a repair it will result in a rent increase or eviction	23%	19%	15%	13%	18%	24%	19%
Too much traffic/too much street/highway noise	18%	21%	17%	12%	15%	18%	18%
I have bad/rude/loud neighbors	19%	15%	16%	11%	13%	12%	15%
Inadequate sidewalks, street lights, drainage, or other infrastructure in my neighborhood	13%	21%	6%	9%	5%	6%	13%
No or few grocery stores/healthy food stores in the area	11%	20%	5%	11%	6%	7%	13%
High crime in my neighborhood	13%	20%	3%	2%	4%	6%	11%
My house or apartment isn't big enough for my family members	10%	11%	15%	11%	9%	12%	11%
My landlord refuses to make repairs despite my requests	13%	11%	12%	6%	6%	13%	11%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	17%	11%	3%	0%	11%	9%	10%

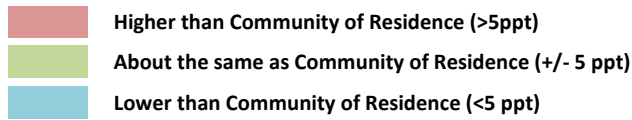
Note: - Sample size too small to report.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

When asked about equal treatment, Aurora residents report less variance by resident group than in other jurisdictions, as shown in the graphic below. Hispanic and White residents report the same level of treatment, which is not the case in any other jurisdiction.

Figure ES-7.

Do you feel that all residents in the area where you live are treated equally or the same as residents of other areas in your community? (% Yes)



	Aurora	Denver	Boulder	Broomfield	Boulder County	Longmont	Consortium	Region
All residents	57%	57%	64%	76%	67%	67%	67%	60%
Race/ethnicity								
African American	46%	31%	-	-	-	-	36%	-
Asian	48%	68%	-	-	-	-	65%	59%
Hispanic	61%	41%	63%	-	61%	52%	58%	48%
Native American	67%	24%	43%	-	-	-	49%	38%
White	62%	63%	68%	78%	71%	70%	70%	65%
LEP	-	64%	70%	-	-	-	62%	61%
Children under 18	56%	55%	66%	86%	64%	66%	67%	59%
Large family	52%	47%	51%	73%	57%	60%	58%	50%
Disability	46%	42%	45%	57%	61%	52%	52%	46%
Section 8	41%	40%	23%	-	57%	-	40%	39%
Household Income								
Less than \$25,000	42%	45%	63%	-	63%	45%	52%	48%
\$25,000 up to \$50,000	48%	48%	64%	-	58%	67%	63%	54%
\$50,000 up to \$100,000	63%	58%	71%	83%	74%	71%	72%	63%
\$100,000 or more	65%	70%	78%	86%	79%	83%	81%	73%

Note: -- indicates insufficient data.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Residents surveyed for this study were asked to rate their level of agreement with a series of statements on a scale of 0-9 where a rating of 0 means strongly disagree and a rating of 9 means strongly agree. These statements measured neighborhood resistance to development types, community acceptance, and access to opportunity indicators.

In general, Aurora was rated similar to other communities. The areas where Aurora stood out were two: 1) Lack of a network of friends/community; and 2) Lower resident support for affordable housing.

Goals and Action Items

The City of Aurora will develop a Comprehensive Housing Strategy in 2019 that will consider the findings from this research. Specific action items that have been developed to address the fair housing barriers identified in this study will be incorporated into the City's new Five-year 019-2023 Consolidated Plan, completed in fall 2019, and include:

- 1) Add affordable housing to the market. Prioritize housing that accommodates families (larger units).

Action items: Implement policies that produce 100 affordable housing units from HOME funds on an annual basis. Collaborate with housing developers to ensure they have strong affirmative fair housing marketing plans and accommodate families and seniors.

- 2) Continue to fund rehabilitation and accessibility improvements for low income homeowners to preserve existing affordable housing.

Action items: Continue to fund the City's Home Improvement Loan Program that helps low-income homeowners and property owners. Assist no less than 76 units annually with rehabilitation and improvements through the City program and/or minor home repair programs.

- 3) Create a program to "buy down" the cost of Market Rate units created by the private market and which are not affordable to persons at or below 60% Area Median Incomes

Action items: In 2019, the HOME Tenant Based Rental Assistance program will give low income residents access high economic opportunity environments. Assist approximately 8-10 households annually.

SECTION I.

Community Participation Process

SECTION I.

Community Participation Process

The Regional AI was completed with an extensive community engagement process. Methods of engagement included a resident survey; resident focus groups; stakeholder focus groups; pop up engagement at legal clinics, day labor sites, and day shelters; presentations at policymaker meetings; and two large community meetings. This resulted in engagement of **nearly 6,500 residents and stakeholders**. Findings from this engagement, in addition to the quantitative analysis conducted for the study, were used to identify impediments and determine the highest priority fair housing issues.

Many partners assisted in promoting the survey, focus groups, and community meetings. The study team would like to sincerely thank Warm Cookies of the Revolution, Community Language Cooperative, Molina Speaks, Project Voyce, DRIVE, Shop Talk Live, The Center, ADAPT, Atlantis Communities, Emily Griffith Technical College, Jewish Family Services, Denverite, and others we may have missed. Your participation was critical to a meaningful process.

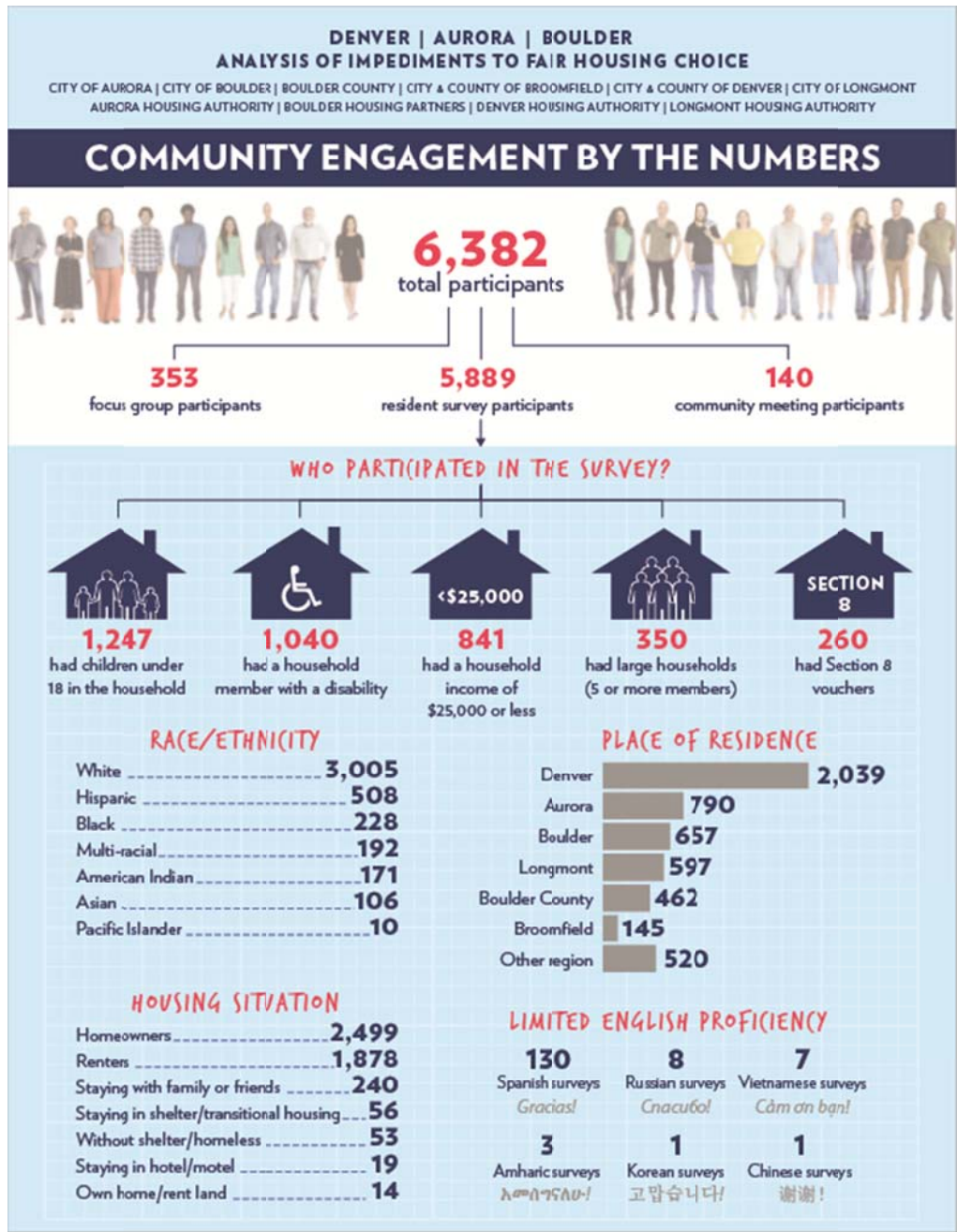
This section discusses provides detail on the engagement process and representation of typically underrepresented residents, members of protected classes, residents most vulnerable to housing and economic barriers, and policymakers and community leaders. It is organized by type of engagement.

The top findings and needs that arose as part of the engagement are interwoven into the report sections. Appendix C contains detailed results from the resident survey.

Engagement opportunities included:

- **Resident survey**—Surveys were received from nearly 6,000 residents in Denver, Aurora, and the Boulder Broomfield Consortium, representing all types of protected classes and many different housing situations. By geography, approximately 2,000 surveys were received by Denver residents, 800 from Aurora residents, 650 from City of Boulder residents, 150 from Broomfield residents, 600 from Longmont residents, and 450 from residents in other areas of Boulder County. Another 500 residents participated from the broader Denver-Boulder region.

Approximately 1,000 survey respondents were residents with disabilities, 850 were households living below the poverty level, 250 were Housing Choice Voucher holders, 150 had limited English proficiency, and 150 were living in precarious situations (short term motels, shelters). 350 represented large households and 1,250 had children living in the home.



- **Resident focus groups**—350 residents participated in-depth discussions about their housing challenges. These groups primarily represented immigrants, Spanish speakers, African Americans, families with children, persons with disabilities, LGBTQ residents, and at-risk youth.
- **Stakeholder focus groups**—Policy and thought leaders attended focus groups dedicated to discussing equity and challenges in education; job training, employer needs, employee recruitment; providing housing and services to persons experiencing or at-risk of homelessness; access to housing and services for persons with disabilities, and human rights.

- **Pop up engagement**—To round out resident engagement and ensure that protected classes were represented, the study team visited day labor sites, ethnic food markets, the St. Francis Day Shelter, central libraries, food pantries, and mobile home parks in rural areas to have conversations with residents about their housing challenges and distribute surveys.
- **Community meetings**—The study culminated in two large, interactive, community celebrations and discussions of housing needs, attended by more than 150 residents representing many cultures, traditions, languages, family types, and races and ethnicities. Translations were offered in Spanish, Somali, Pashtun, Burmese, French, and Kareni.

In addition, a website was created for the study to keep residents and stakeholders updated about the process, communicate opportunities to get involved, provide access to the resident survey, and make the draft report available.

The website was available in five languages in addition to English. More than 2,000 residents accessed the website and used the translation features.

Promotion of engagement opportunities. The above engagement opportunities were promoted extensively through postings on city and county websites and social media, press releases, and advertised in flyers dropped in neighborhood markets. In Longmont, for example, residents were notified of engagement opportunities through weekly emails sent to residents who signed up to receive such notifications. The survey link appeared in weekly City of Denver employee bulletins. Some Denver City Council members posted the availability of the survey and information about the AI effort in their emailed newsletters.

Kickoff events held in Boulder and Aurora brought regional stakeholders in affordable housing provision, human services, civil rights and other interested advocates together for an informational presentation about the study and to encourage attendees to participate in the public engagement and promote the survey to their clients, consumers and allies. More than 50 stakeholders participated and video of each meeting was available on the study website.

Cities and the county also sent surveys and notifications about meetings to local nonprofits that serve target populations and made surveys available at city senior centers, neighborhood service windows, and through neighborhood groups/registered HOAs. Examples include distribution of survey flyers at a Montbello Community Forum, Boulder County Homeowners Training English and Spanish-language classes, Longmont Mental Health First Aid classes, and providing survey materials and packets to nonprofits. The City of Aurora promotions of the survey included a news segment on the Aurora News Weekly broadcast airing on Comcast Channel 8 in Aurora (<https://www.auroratv.org/News/News.html?show=6047>);

In the Boulder Broomfield Consortium, the survey was also promoted through Boulder County Homeownership Training classes (both English and Spanish classes) and Mental Health First Aid classes.

Public housing authorities held meetings with residents to get their input, made surveys available at their front offices and properties, and emailed residents about the availability of the

survey (all PHAs). These efforts reached more than 5,000 households who receive publicly assisted housing or are on the wait and interests lists.

The Denver Metro Fair Housing Center and National Fair Housing Alliance placed ads in area Spanish-language newspapers and neighborhood publications and blasted information about the study to their networks.

The local online publication Denverite ran an article about the study and opportunity to participate through the survey. Channel 8 dedicated one of its April arts and culture segments to the community meetings (<https://denver8.tv/arts-culture/>)

Resident Survey

As discussed previously, respondents to the resident survey represent the demographic and socioeconomic spectrum of regional residents, as well as their individual communities of residence. Residents were asked about a variety of housing and community development challenges in the survey. Through the survey, the study captured information on residents':

- Reasons for choosing their housing type and location,
- Barriers to changing their housing situation,
- Greatest worries about their housing situation,
- Primary housing challenges,
- If they have experienced discrimination,
- Knowledge of resources to assist with perceived housing discrimination,
- Ability to get an accommodation for a disability, as needed, and
- Opinions on equitable distribution of quality schools, parks and recreation facilities, and neighborhood amenities.

The survey was available from November 1, 2017 through January 30, 2018.

Language access and reasonable accommodations. The survey was available in online and postage-paid paper formats in seven languages: Amharic, Chinese, English, Korean, Russian, Spanish and Vietnamese, as were the promotional flyers. In addition to the formal translations, volunteers with Jewish Family Services helped Arabic speakers complete the survey.

The surveys and promotional flyers included contact information to request a reasonable accommodation for residents with a disability, and the online survey system used is Section 508 compliant. An Aurora resident who is deaf requested the assistance of an ASL interpreter to participate; BBC provided the interpreter and conducted the survey with the resident in-person at BBC's offices.

Resident Focus Groups

In depth discussions about housing challenges were held with the following protected classes:

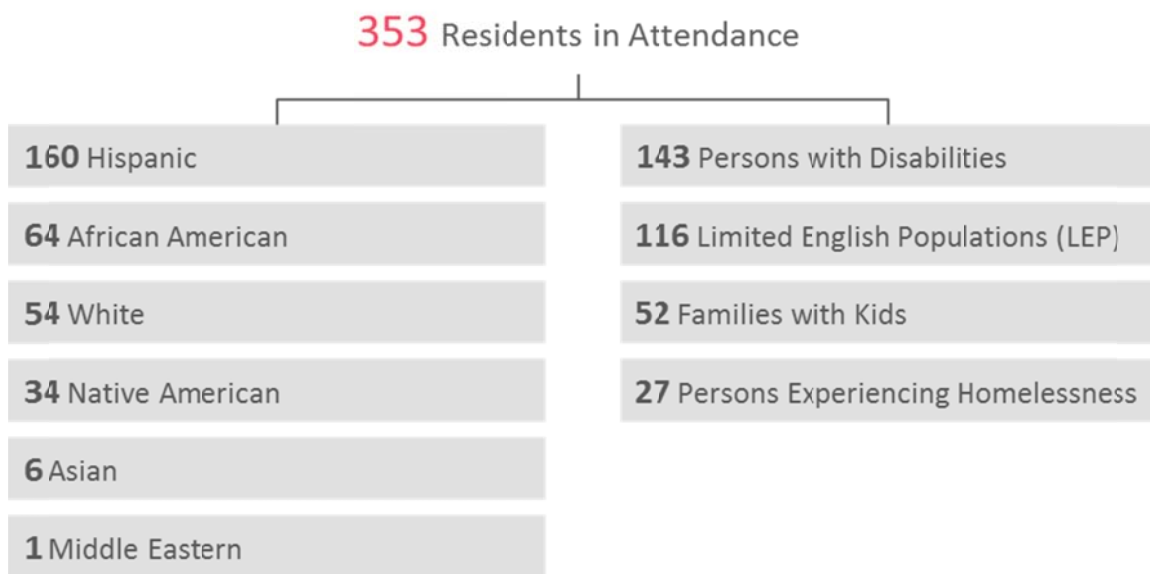
11/13/17—Residents of the Village at Westerly Creek (Aurora Housing Authority properties residents)

11/23/17 – Residents attending Denver Central Library coffee hour (many experiencing homelessness)

11/27/17 – Residents living in the Westwood neighborhood of Denver

- 12/5/17 – Residents living in the Cole and Five Points neighborhoods of Denver
- 12/7/17 –Residents seeking services at the Aurora Economic Opportunity Coalition (conducted in Spanish)
- 12/7/17 –Residents seeking employment at the Day Labor Center (conducted in Spanish)
- 12/13/17 – Residents at the St. Francis Day Shelter
- 12/15/17 -- Residents living in the Montbello neighborhoods of Denver
- 1/3/18 – Residents with disabilities at Atlantis Communities
- 1/3/18 – LGBTQ teenagers and young adults at The Center
- 1/17/18 – Residents at Mi Casa resource center (conducted in Spanish)

Resident Groups Represented in Resident Focus Groups



Source: BBC Research & Consulting.

Stakeholder Focus Groups

In depth discussions about policy solutions to housing and economic barriers were held with:

- 12/20/17 – Stakeholders who work with persons experiencing homelessness
- 1/4/18 – Stakeholders who work with persons with disabilities and elderly
- 1/4/18 – Stakeholders who work the K-12 education sector
- 1/12/18 – Stakeholders who work in the employment and job training industries

Home...Bigger than Houses Community Meetings

Discussing housing challenges—particularly the experience of discrimination—can be difficult for residents. For some, their experiences are embarrassing, particularly if they occurred in front of family members (e.g., being evicted while the children were at home). Others may feel hopeless and scared. Some are angry. Some cultures are not accustomed to sharing personal information about economic challenges. Indeed, many residents cried when describing their situations or discussed their situations with much hesitancy when in the focus groups.

The community meetings for this study took a different approach—they were **about solutions, about hope**. They celebrated the diverse and rich cultures in the region, and, most importantly, cultivated cross-pollination of ideas to address housing and economic needs.



SHARE YOUR EXPERIENCES AND HEAR ABOUT SOLUTIONS
What kind of a community are we right now? What are our HOPEs, FEARS, and NEEDS for housing? Come enjoy the rich and diverse culture and tasty foods from the Westside and the Eastside while exploring creative solutions to our housing crisis. With music, poetry, food, resident experts, and YOU!

COMPARTÉ TUS EXPERIENCIAS Y ESCUCHA ALGUNAS SOLUCIONES
¿Qué tipo de comunidad somos en este momento? ¿Cuáles son nuestras ESPERANZAS, TEMORES y NECESIDADES para la vivienda? Acompáñenos a disfrutar de la cultura rica y diversa y comidas sabrosas de Westside y Eastside mientras exploramos soluciones creativas a nuestra crisis de vivienda. ¡Con música, poesía, comida, residentes expertos y USTED!

WEST SIDE TASTE THE BEST CUISINE FROM FEDERAL BLVD
PRUEBA LA MEJOR COCINA DE LA FEDERAL BLVD

FEBRUARY 10 SATURDAY 11 AM - 1:30 PM
SANT ROSE OF LIMA SCHOOL | 1345 W DAKOTA AVE | DENVER, CO 80223

10 DE FEBRERO SÁBADO 11 AM - 1:30 PM
SANT ROSE OF LIMA SCHOOL | 1345 W DAKOTA AVE | DENVER, CO 80223

EAST SIDE PERFORMANCES AND FOOD FROM COLFAX AVE
ACTUACIONES Y COMIDA DE LA COLFAX AVE

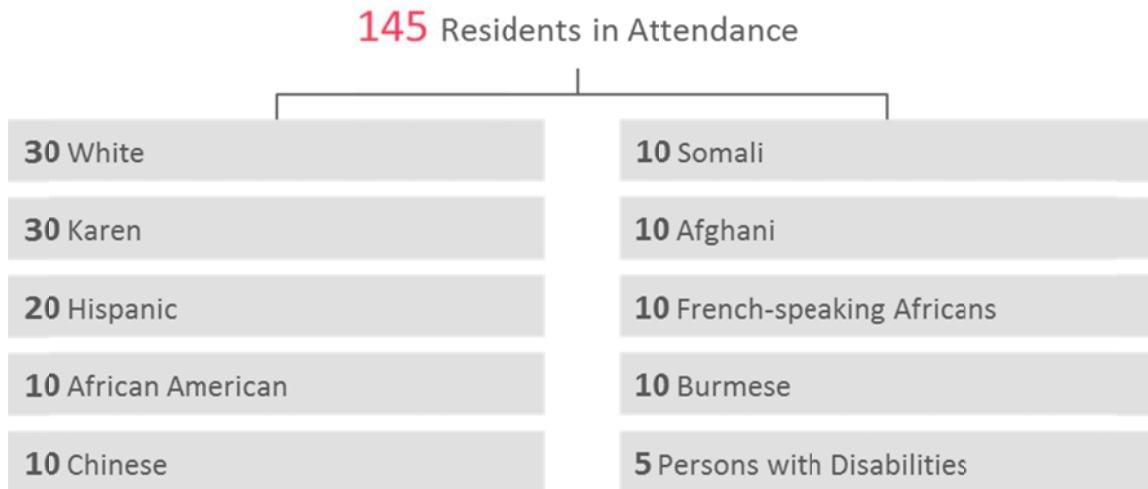
FEBRUARY 24 SATURDAY 11 AM - 1:30 PM
VILLAGE EXCHANGE CENTER | 1619 HAVANA ST | AURORA, CO 81010

24 DE FEBRERO SÁBADO 11 AM - 1:30 PM
VILLAGE EXCHANGE CENTER | 1619 HAVANA ST | AURORA, CO 81010



The meetings were held on Saturdays in February in West Denver and West Aurora/East Denver. These locations represented racial and ethnic and poverty concentrations, as well as neighborhoods that are vulnerable to economic changes and potential displacement of long-time residents.

Estimated Resident Groups Represented in Community Meetings



Source: BBC Research & Consulting.

Residents engaged in small focus groups and participated in activities to tell their housing stories. Activities included:

- Communicating hopes, dreams, fears, and stories about housing and neighborhood challenges through visual art;
- Participating in break out groups to discuss housing solutions, ask questions about city policies and budgeting, discuss innovative solutions such as land trusts and community credit models, receive information about fair housing resources;
- A variety of musical and dance artists including refugee choirs, traditional Chinese dancing, reggae, spoken word, and poetry;
- Activities and child care for children; and
- Food from local vendors.

Home Bigger than Houses – Eastside

<https://vimeo.com/259219978>



The housing solutions presentation delivered at the events is appended to this section.

Stakeholder partnerships. BBC developed a Community Engagement in a Box tool for use by stakeholders to build capacity to engage their clients, consumers and coalition members in the AI (then AFH) process through promoting and distributing the resident survey, facilitating community conversations and focus groups, sharing the AFFH-T maps and using all of the community engagement tools available to participating jurisdictions. Interested stakeholders could request a Box which included printed surveys in each of the four languages; flyers promoting the online survey, a booklet of AFFH-T maps and instructions for interpreting the maps; and a community conversations discussion guide.

BBC facilitated a two in person meetings and taped the sessions for participating stakeholders to learn about how to support the CE process. Links to the taped sessions can be found at:

The figure below recognizes the organizations, agencies and coalitions that participated in making the regional AI community participation process a success. In addition to lending their subject-matter expertise to the AFH development, participating organizations promoted resident engagement opportunities to their clients, consumers and coalition members; tirelessly distributed surveys; recruited focus group participants; and encouraged residents to attend the community open house events.

Participating Stakeholder Organizations

Note:

Participating organizations were identified through stakeholder kickoff meeting sign-in sheets, receipt of Community Engagement in a Box materials or webinar participation, participation in conference calls, focus group hosts or recruiting support and as signatories to communications providing guidance for the community engagement process.

Source:

BBC Research & Consulting.

Stakeholders Participating in AI through Focus Groups, Survey Distribution, Interviews	Population Served or Fair Housing Focus
9 to 5 Denver	Low income, immigrants
A Plus Colorado	Education
Ability Connection Colorado	Persons with disabilities
ADAPT Denver	Persons with disabilities
The Arc of Colorado	Persons with disabilities
Area Agencies on Aging	Seniors and persons with disabilities
Atlantis Communities	Persons with disabilities
Aurora Housing Authority	Low income
Aurora Mental Health	Persons with disabilities
Aurora Public Schools	Low income families/at-risk youth
Bell Policy Center	Education
Blind Institute of Technology	Persons with disabilities
Boulder County Housing Authority	Low income
Boulder Housing Partners	Low income
Center for Work Education and Employment	Employment
Chambers of Commerce	Employment
Colorado Cross Disabilities Coalition	Persons with disabilities
Community College of Aurora	Employment and education
Community College of Denver	Employment
Community Enterprise Development Services	Small business development
The Delores Project	Persons experiencing homelessness
Denver Housing Authority	Low income
Denver Metro Fair Housing Center	All Protected Classes
Denver Public Library	Low income/homeless
Denver Public Schools	Low income families/at-risk youth
Disability Commission (Denver)	Persons with disabilities
Donnell Kay Foundation	Education
East Area Plan	Neighborhood planning
Emily Griffith Technical College	Employment and education
Front Range Community College	Employment and education
Goodwill Industries	Low income
Longmont Housing Authority	Low income
Mental Health Center of Denver	Mental health
Mental Health Partners of Boulder/Broomfield Counties	Mental health
New America School	Immigrants/education
One Colorado/One Colorado Education Fund	LGBTQ
Open Door to Success Director Open Ministries	Low income
Rocky Mountain MicroFinance Institute	Small business development
Safe Shelter of St. Vrain	Persons experiencing homelessness
St. Francis Center	Persons experiencing homelessness
Thrive Center	Persons with disabilities
United for a New Economy	General equity
University of Denver	Persons experiencing homelessness
Veterans Administration	Persons experiencing homelessness
Volunteers of America	Persons experiencing homelessness
Westwood neighborhood organization	Latinos, immigrants
Women's Bean Project	Low income women
Women with a Cause Foundation	Single mothers

Website

A website was created and was live during the AI development to:

- Provide information about the purpose of the study and the participating jurisdictions and PHAs;
- Share the videos of the stakeholder kick off events (for those who could not attend);
- Share HUD resources, including the AFFH data and mapping tool and a custom matrix to assist with interpretation;
- Make the resident survey available;
- Make the draft report available; and
- Link to fair housing resources for residents who think they have experienced discrimination.

<http://denver-aurora-boulderafh.com/>

Denver Aurora Boulder Assessment of Fair Housing

English >

AFH DENVER AURORA BOULDER

Home About HUD Data Draft AFH Get Involved Fair Housing Help & Resources

WELCOME TO
THE AFH WEBSITE

Learn More Get Involved

What is the Assessment of fair Housing (AFH)?

The AFH is a planning process for local governments and public housing agencies (PHAs) to take meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.

READ MORE

Who is doing the AFH study?

This study is a collaborative effort among the City of Aurora; the Aurora Housing Authority; the City and County of Denver; the Denver Housing Authority; and the Boulder/Broomfield HOME Consortium, which includes the City of Longmont, Boulder County, the City and County of Broomfield, Boulder Housing partners, City of Boulder, Boulder County Housing Authority and Longmont Housing Authority.

The website was available in five languages in addition to English. More than 2,000 residents accessed the website and used the translation features.

Policy Briefings

Findings from the Regional AI were presented to the Denver Human Rights Commission; Boulder City Council; City of Aurora Housing Committee; and to the broad policy community as part of the Regional Housing Summit in May 2018, sponsored by the City and County of Denver Office of Economic Development.

Appended to this section is one of the presentations used in the community meetings and policy briefings to describe the primary findings from the AI and to facilitate a discussion on community solutions.

HOUSING

IMPEDIMENTS

STUDY

HOUSING IMPEDIMENTS STUDY

Cities in the region are required by HUD to complete an Analysis of Impediments, or AI, to evaluate barriers to housing choice. This requirement is linked to the Federal Fair Housing Act of 1968.

The requirement is designed to aid local leaders and community stakeholders in developing housing goals that will ultimately increase fair housing choice, build opportunity for all residents, and strengthen communities.

**A key component of the work is taking
meaningful actions to affirmatively
further fair housing**

HOUSING IMPEDIMENTS STUDY

Resident input:

- ▶ Collected 5,000+ surveys from residents in Denver, Aurora, and Boulder
- ▶ Held community discussions with 150+ residents living in Cole, East Colfax, Montbello, and Westwood neighborhoods
- ▶ Talked with day laborers, residents seeking shelter at Central Library and St. Francis Center, tweens and teens, Atlantis Community constituents, single mothers, refugees, recent immigrants..

HOUSING IMPEDIMENTS STUDY

What we've learned:

- ▶ Rents have increased well beyond manageable levels, especially for residents living on fixed incomes
- ▶ Affordable rentals (<\$1,000/mo), especially those that are accessible, are nearly impossible to find. Very few vacant units accept Section 8
- ▶ Persons with disabilities are afraid to ask for reasonable accommodations for fear of being evicted
- ▶ Main drivers of displacement and evictions: redevelopment or sale of investor-owned housing; additional family members living in the apartment (to avoid homelessness); medical bills/accidents that cause renters to fall behind on rent; landlord perception of tenants as challenging or problematic

HOUSING IMPEDIMENTS STUDY

What we've learned:

- ▶ Children of multi-generation families cannot buy in the neighborhoods in which they were raised
- ▶ Lack of frequent and affordable transportation options prevents families from exercising school choice
- ▶ Access a Ride process is confusing and intimidating; unclear if serves undocumented residents
- ▶ Cuts in bus routes to support light rail make it harder for low income residents to access jobs, services, schools
- ▶ Residents do not know what to do when being evicted, where to find resources for affordable housing, where to find information about fair housing rights

WHAT WORKS: HOUSING SOLUTIONS

IMPROVING RENTAL AFFORDABILITY

Build more units:

- ▶ Public housing (e.g., Denver Housing Authority apartments)
- ▶ Tenant Based Rental Assistance (Section 8 vouchers)
- ▶ Housing coops; Tiny Home villages
- ▶ Construction funds for residents to build accessory dwelling units/basement apartments/utility assistance if rented below market

Reduce rents:

- ▶ Incentives to small landlords (rehabilitation, insurance fund, discounted property management) in exchange for keeping rents below market

Stop bad practices:

- ▶ Regulation: # of applicants charged application fees, per person rental charges, minimum condition

COMBATTING DISPLACEMENT

Enhance resources for displaced families:

- ▶ Eviction response fund and team
- ▶ Short term, transitional housing
- ▶ Allow doubling up

Prevent and regulate displacement:

- ▶ Longer notice of rent increases or lease termination
- ▶ Tenant landlord hotline and mediation
- ▶ Tax on units sold for scrape/redevelopment/high end homes
- ▶ Preferences for displaced households to rent/buy units created with City funds

INCREASING ACCESSIBLE AND ADAPTABLE/VISITABLE HOUSING

Increase adaptable and accessible units:

- ▶ Make all ground floor units in new developments funded by City adaptable and $\frac{1}{4}$ of units accessible.
- ▶ Buy down accessible market rate units
- ▶ Acquire motels and multifamily units, make accessible, and rent under market
- ▶ Landlord fund to make units adaptable/accessible

CREATING HOMEOWNERSHIP

Create affordable units:

- ▶ Community Land Trust, inclusionary units
- ▶ Require affordable units in condo conversions
- ▶ Incentives for sellers to notify City first before units are sold to investors

Buy down units:

- ▶ Tax homes sales and use tax revenue to provide downpayment assistance to displaced residents wanting to buy
- ▶ Help families acquire homes that they are renting which the owner plans to sell

IMPROVING HOUSING KNOWLEDGE

- ▶ Resources in public schools
- ▶ Reliable, ongoing information source for tenants
- ▶ Education for public workers, police and fire departments
- ▶ Renters' rights cards or app



SECTION II.

Demographic Patterns

SECTION II.

Demographic Patterns

This section examines demographic patterns that are associated with residential settlement, housing availability and affordability, and access to opportunity. It sets the stage for the analyses in Sections III (Disproportionate Housing Needs) and IV (Access to Opportunity).

Growth and Diversity

Since 2000, the greater Denver region has become more racial and ethnically diverse.¹ Yet this diversity has not been consistent across counties. Adams and Arapahoe have seen the most significant increase in diversity, with increases in non-White and Hispanic populations exceeding 10 percentage points.

Aurora is unique in that the city has been able to maintain its diversity during the past 30 years and remains one of the most integrated cities nationally: Aurora has the 9th best neighborhood diversity and is the 10th most integrated city among the 100 most populous cities in the U.S.

Figures II-1 through II-4 show demographic shifts in the jurisdictions and comparative regions between 1990 and today, based on HUD estimates. The tables show:

- Aurora’s racial and ethnic diversity has increased significantly, largely due to increases in Hispanic residents as well as foreign born residents. The city’s age distribution and family type have not changed as a result.
- Boulder’s racial and ethnic diversity has changed little since 1990. The city’s foreign-born population has increased, although the growth is smaller than the Boulder region overall and much less significant than in Aurora or Denver. The city’s age distribution has shifted slightly away from children toward seniors.
- Boulder County’s growth has occurred within the White and Hispanic populations, resulting in shifts in ethnic and foreign born population diversity.
- Longmont’s growth is similar, yet more pronounced among Hispanic residents. The city has seen a more significant decrease in families with children than in the County overall.
- Denver’s increase in diversity is much more modest than Aurora’s. Like Aurora, the growth has been driven by increases in residents of Hispanic descent. Foreign born residents have grown significantly. The city has maintained its family and age distribution.

¹ “Greater” refers to the seven-county region which includes Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, and Jefferson Counties.

**Figure II-1.
Table 2 - Demographic Trends, Aurora**

Race/Ethnicity	(Aurora, CO CDBG, HOME, ESG) Jurisdiction				(Denver-Aurora-Lakewood, CO) Region			
	1990 Trend		Current		1990 Trend		Current	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
White, Non-Hispanic	171,547	77.94%	153,577	47.29%	1,312,458	78.77%	1,673,709	65.80%
Black, Non-Hispanic	24,467	11.12%	48,789	15.02%	92,229	5.54%	135,334	5.32%
Hispanic	14,519	6.60%	93,378	28.75%	212,233	12.74%	571,131	22.45%
Asian or Pacific Islander, Non-Hispanic	7,955	3.61%	16,611	5.11%	35,392	2.12%	94,605	3.72%
Native American, Non-Hispanic	1,147	0.52%	1,490	0.46%	9,569	0.57%	12,407	0.49%
National Origin								
Foreign-born	12,406	5.64%	68,160	20.99%	82,413	4.95%	311,594	12.25%
LEP								
Limited English Proficiency	6,615	3.00%	47,551	14.64%	58,436	3.51%	198,357	7.80%
Sex								
Male	106,986	48.60%	160,168	49.31%	818,846	49.16%	1,264,550	49.72%
Female	113,163	51.40%	164,619	50.69%	846,963	50.84%	1,278,932	50.28%
Age								
Under 18	60,380	27.43%	88,948	27.39%	431,862	25.93%	634,459	24.94%
18-64	145,020	65.87%	206,841	63.69%	1,079,274	64.79%	1,653,467	65.01%
65+	14,749	6.70%	28,998	8.93%	154,672	9.29%	255,556	10.05%
Family Type								
Families with children	32,591	56.02%	40,832	51.39%	223,817	51.33%	305,298	48.29%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS.

**Figure II-2.
Table 2 – City of Boulder**

	(Boulder, CO CDBG) Jurisdiction				(Boulder, CO) Region			
	1990 Trend		Current		1990 Trend		Current	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Race/Ethnicity								
White, Non-Hispanic	79,169	89.76%	81,189	83.28%	187,605	89.27%	233,741	79.35%
Black, Non-Hispanic	1,044	1.18%	821	0.84%	1,731	0.82%	2,265	0.77%
Hispanic	4,302	4.88%	8,400	8.62%	14,421	6.86%	39,276	13.33%
Asian or Pacific Islander, Non-Hispanic	3,185	3.61%	4,560	4.68%	5,027	2.39%	12,149	4.12%
Native American, Non-Hispanic	359	0.41%	280	0.29%	981	0.47%	1,061	0.36%
National Origin								
Foreign-born	6,955	7.90%	10,172	10.43%	11,917	5.67%	32,694	11.10%
LEP								
Limited English Proficiency	2,994	3.40%	3,975	4.08%	6,260	2.98%	16,359	5.55%
Sex								
Male	44,588	50.63%	50,015	51.30%	105,475	50.20%	147,916	50.21%
Female	43,473	49.37%	47,474	48.70%	104,645	49.80%	146,651	49.79%
Age								
Under 18	13,680	15.53%	13,444	13.79%	47,358	22.54%	62,754	21.30%
18-64	67,599	76.76%	75,023	76.96%	146,832	69.88%	202,292	68.67%
65+	6,782	7.70%	9,022	9.25%	15,929	7.58%	29,521	10.02%
Family Type								
Families with children	7,934	46.03%	7,505	44.30%	25,898	51.03%	32,868	47.71%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS.

**Figure II-4.
Table 2 - Demographic Trends, Longmont**

	(Longmont, CO CDBG) Jurisdiction				(Boulder, CO) Region			
	1990 Trend		Current		1990 Trend		Current	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Race/Ethnicity								
White, Non-Hispanic	45,008	86.75%	59,461	69.53%	187,605	89.27%	233,741	79.35%
Black, Non-Hispanic	166	0.32%	648	0.76%	1,731	0.82%	2,265	0.77%
Hispanic	5,693	10.97%	20,898	24.44%	14,421	6.86%	39,276	13.33%
Asian or Pacific Islander, Non-Hispanic	623	1.20%	2,632	3.08%	5,027	2.39%	12,149	4.12%
Native American, Non-Hispanic	292	0.56%	411	0.48%	981	0.47%	1,061	0.36%
National Origin								
Foreign-born	2,001	3.87%	12,600	14.73%	11,917	5.67%	32,694	11.10%
LEP								
Limited English Proficiency	1,854	3.58%	8,786	10.27%	6,260	2.98%	16,359	5.55%
Sex								
Male	25,420	49.14%	42,154	49.29%	105,475	50.20%	147,916	50.21%
Female	26,307	50.86%	43,361	50.71%	104,645	49.80%	146,651	49.79%
Age								
Under 18	14,525	28.08%	22,231	26.00%	47,358	22.54%	62,754	21.30%
18-64	32,115	62.09%	53,562	62.63%	146,832	69.88%	202,292	68.67%
65+	5,087	9.83%	9,722	11.37%	15,929	7.58%	29,521	10.02%
Family Type								
Families with children	7,799	54.85%	10,750	48.96%	25,898	51.03%	32,868	47.71%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS.

The maps on the following pages, from HUD’s mapping tool created for fair housing studies, show where residents live by race, ethnicity, and national origin. Maps are shown for each jurisdiction (except Broomfield, for which they were unavailable) and include:

- Changes in racial and ethnic settlement patterns 1990 to 2000 to 2010;
- Location of foreign born residents (a proxy for national origin in the Fair Housing Act); and
- Location of Limited English Proficiency (LEP) residents.

As the maps show, the participating jurisdictions have very different racial and ethnic settlement patterns. These are due to the age of the community, when and how the communities grew, and affordability of housing.

- Aurora was developed as a Denver suburb in 1891. Much of its early growth was connected to its proximity to three military posts, Buckley, Fitzsimmons, and Lowry. The city’s military heritage, as well as its variety of housing types and prices, is one reason it remains one of the most racially and ethnically diverse cities in the Intermountain West. Military and supporting industries employed a diverse set of residents (including women) out of necessity during wartime economic expansions (civil rights laws were not yet in place). Although this did not ensure fully integrated communities or work environments, it facilitated residential settlement patterns that led to more diverse neighborhoods. This can also be seen in Denver neighborhoods that are adjacent to Aurora and had similar military associations (East Colfax, Montclair, Lowry).
- Boulder, originally home to Native Americans, attracted gold miners in the mid-1850s and shortly thereafter became the home to the University of Colorado. The town quickly became known for its strong economy, educational system, and stately neighborhoods. In sum, Boulder was developed as a community for entrepreneurs and residents seeking higher education—features that have long attracted investment, and wealth, and made the city relatively expensive.
- Denver, the most urban city in the Intermountain West, was settled by gold prospectors. Its first growth spurt was related to the expansion of the railroad. Denver’s growth has continued to be very dependent on economic fluctuations, and many early settlement patterns were associated with industry expansions (e.g., Globeville). Manufacturing companies offered some of the best jobs to African Americans and foreign-born residents.

Denver’s racial and ethnic concentrations are also related to federal policies that promoted segregation, which led to the establishment of many of the city’s richest cultures: Denver’s Five Points neighborhood developed a national reputation for the musical and artistic talent of African American residents; West Denver created a rich Latino and Latina community bringing the state’s southwest heritage into the city; and the Park Hill neighborhood was established as a rebellion against segregation. Yet Denver was not without racism: It is now broadly known that one of Denver’s mayors (Stapleton) was a member of the Ku Klux Klan.

- Longmont was valued as an agricultural community and, as such, attracted a variety of settlers from across the country. The city was diverse in its origin: The original settlers were people of Swedish, German, Russian, Mexican, and Japanese descent: Like Denver, however, the Ku Klux Klan had a brief period of control over the city, from 1925 to 1927, after which they were voted out of office by residents. The city remains a mix of high tech and service workers and has maintained diversity through periods of growth.

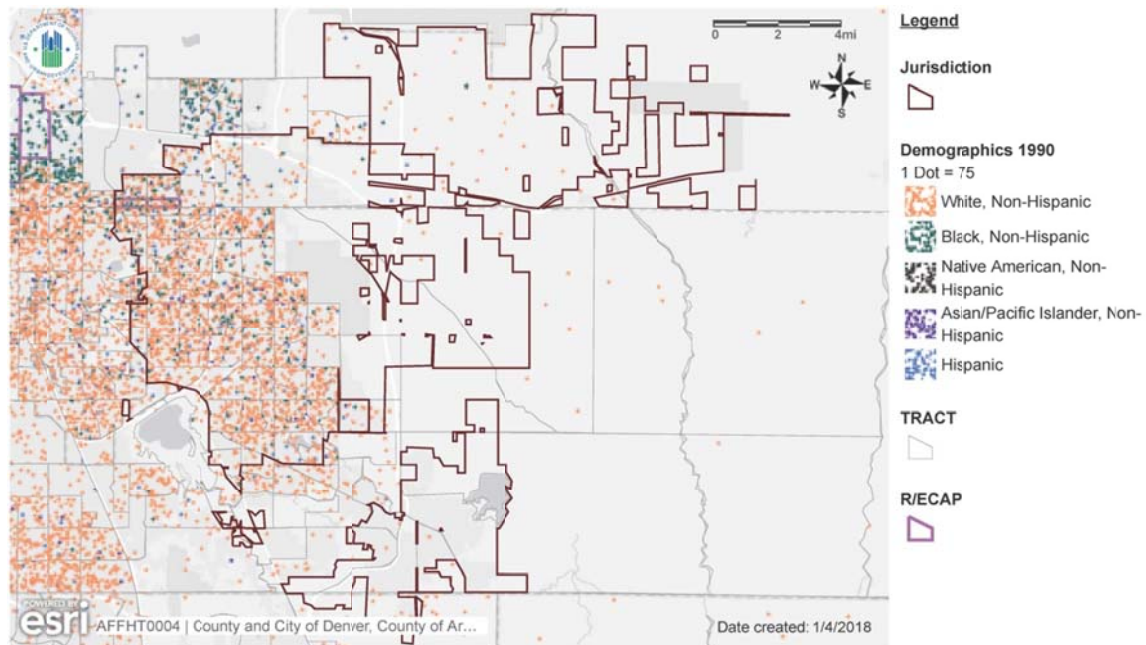
Both Aurora and Longmont have been awarded the distinction of “All American City” for their diversity and creative, civic engagement of residents.

The maps that follow show racial and ethnic changes for some, but not all, jurisdictions. Aurora grew more concentrated between 1990 and 2000. The City of Boulder demonstrates densification during this period, but little changes in racial and ethnic makeup or concentrations. Longmont shows an increasing presence of Hispanic residents between 2000 and 2010 with some clustering, but no strong concentrations. Denver demonstrates the most pronounced racial and ethnic clustering—still reflective of its history—and very few changes during the 20 years captured by the maps.

The maps also show a correlation between foreign-born residents of Hispanic origin and LEP residents. Aurora shows the most unique and diverse patterns by national origin.

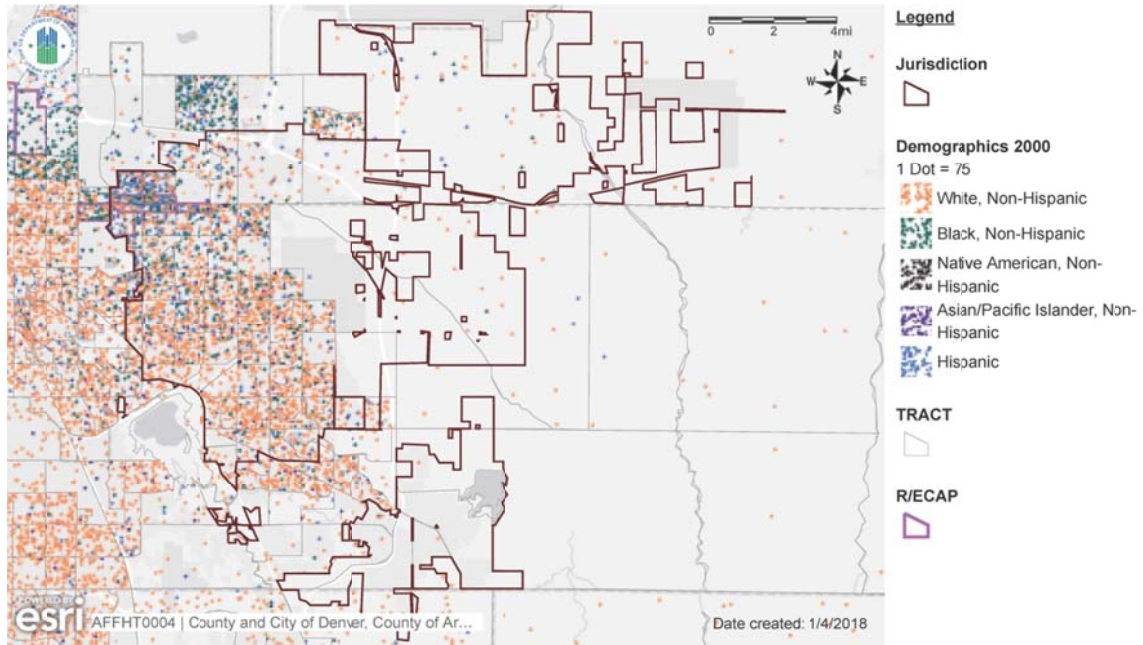
It is important to note that the data in the maps do not capture recent growth trends and, as such, do not show the implications of recent growth, loss of affordability, and displacement of residents.

Figure II-5.
Race/Ethnicity Trends, 1990, Aurora



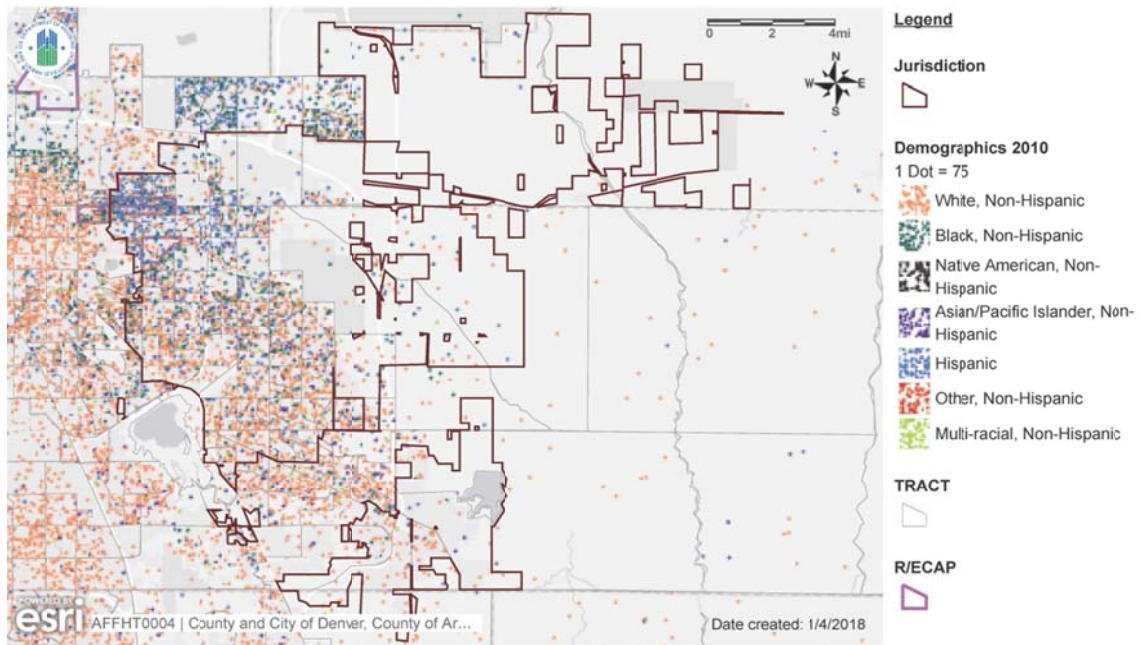
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-6.
Race/Ethnicity Trends, 2000, Aurora



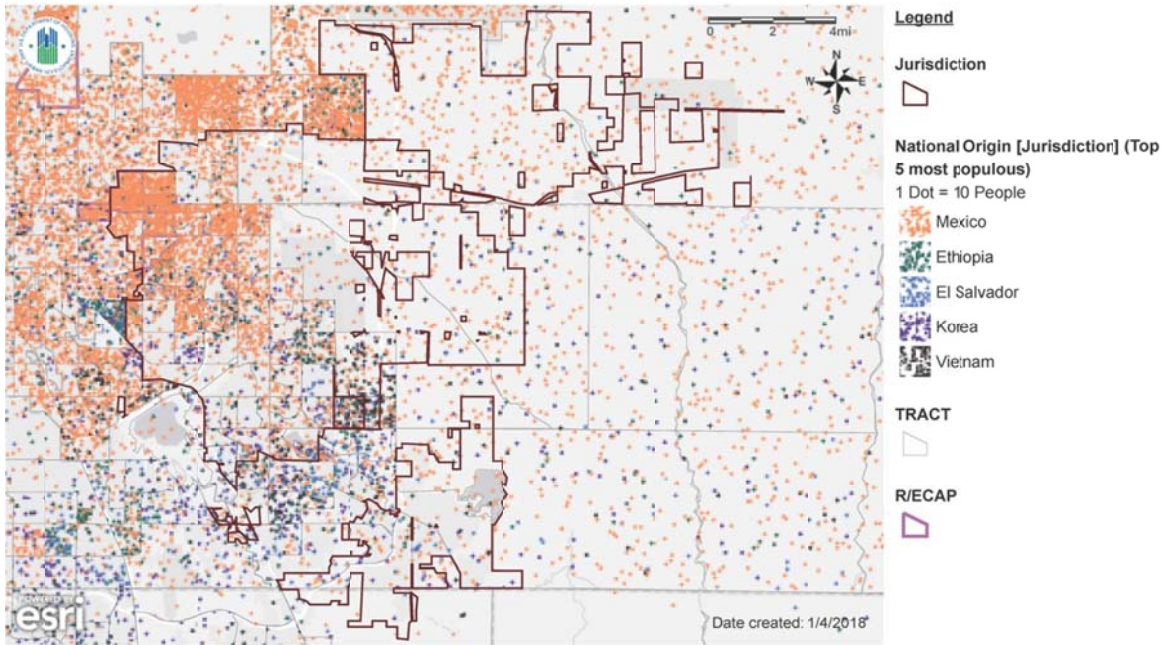
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-7.
Race/Ethnicity, 2010, Aurora



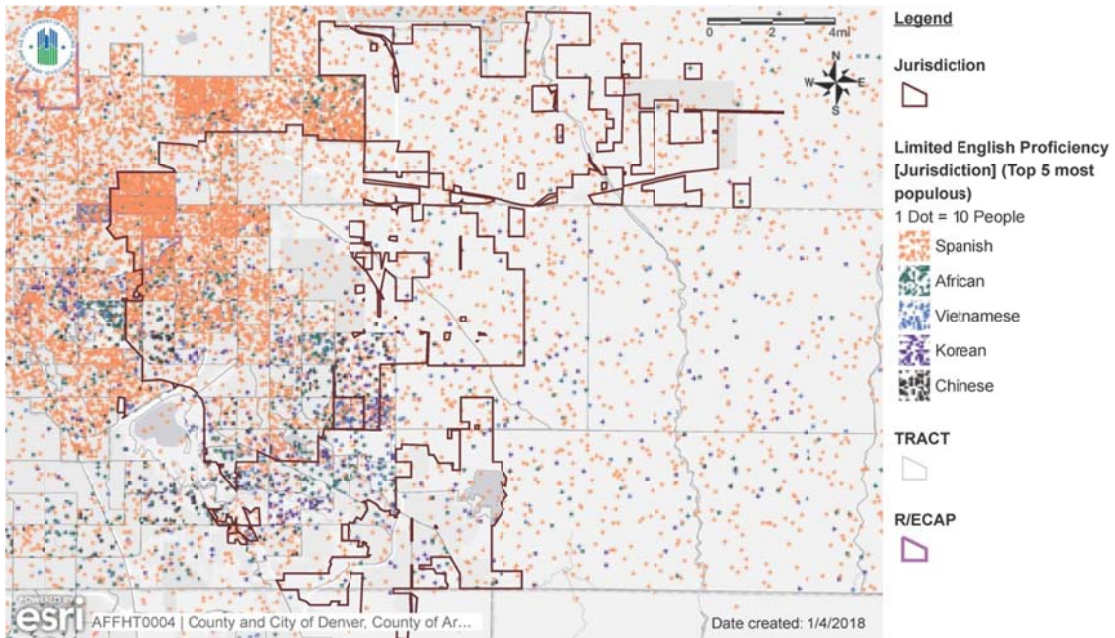
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-8.
National Origin, Aurora



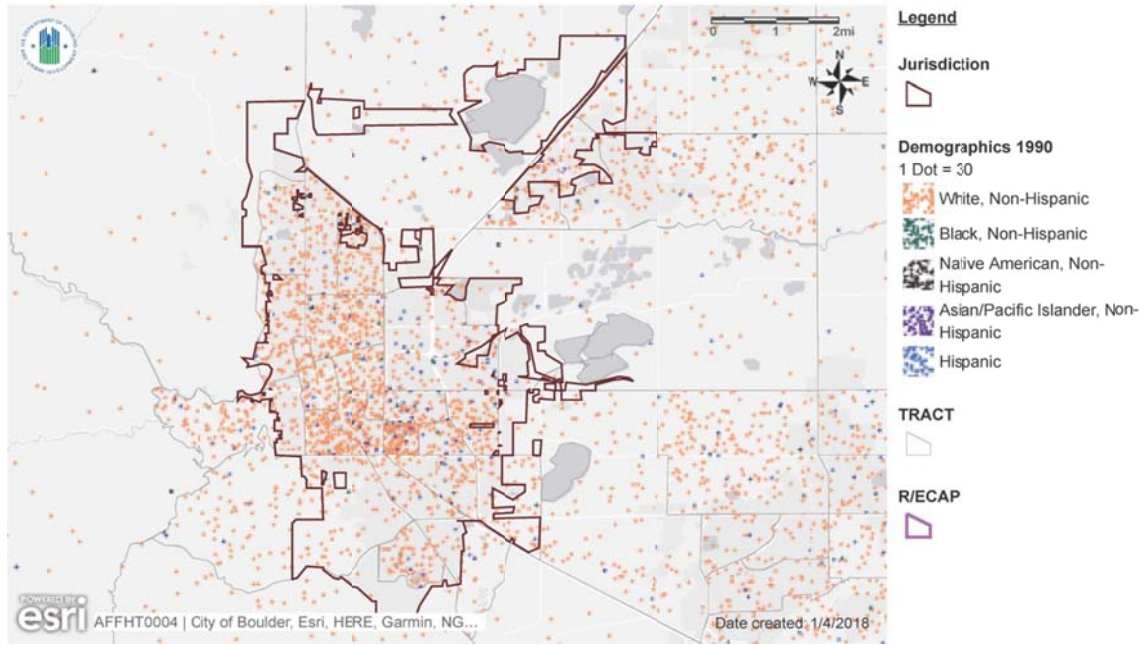
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-9.
Limited English Proficiency (LEP), Aurora



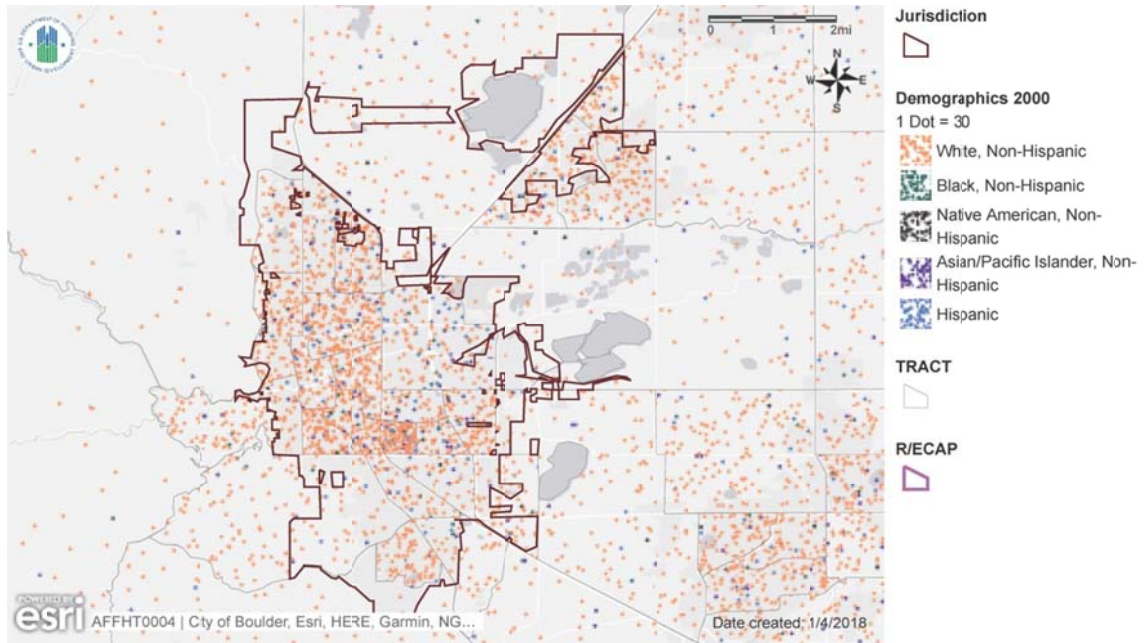
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-10.
Race/Ethnicity Trends, 1990, City of Boulder



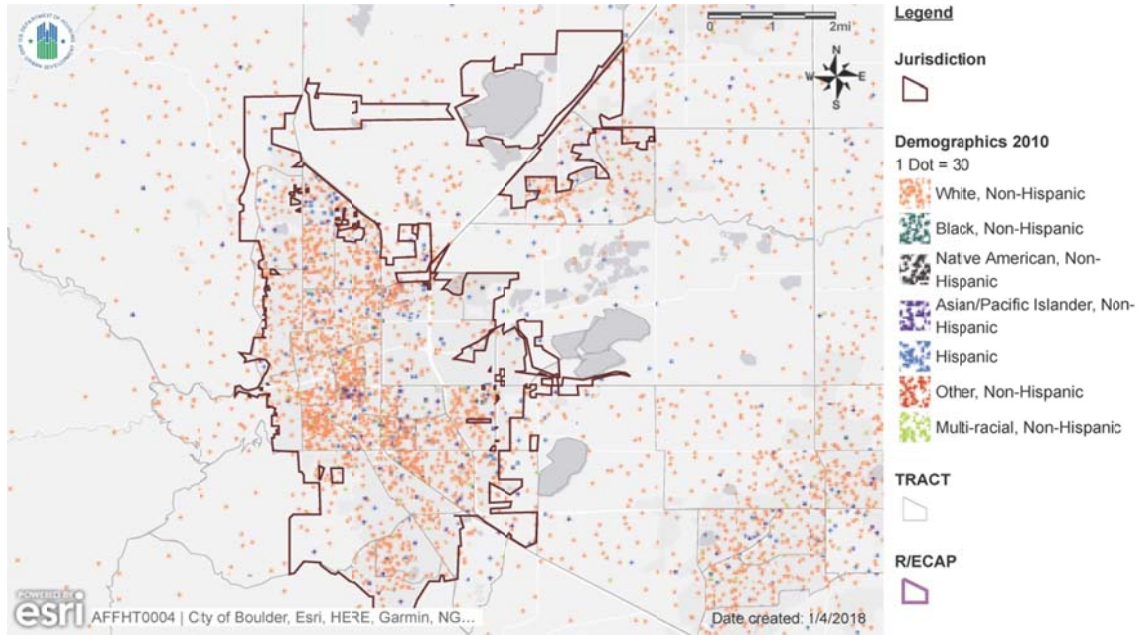
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-11.
Race/Ethnicity Trends, 2000, City of Boulder



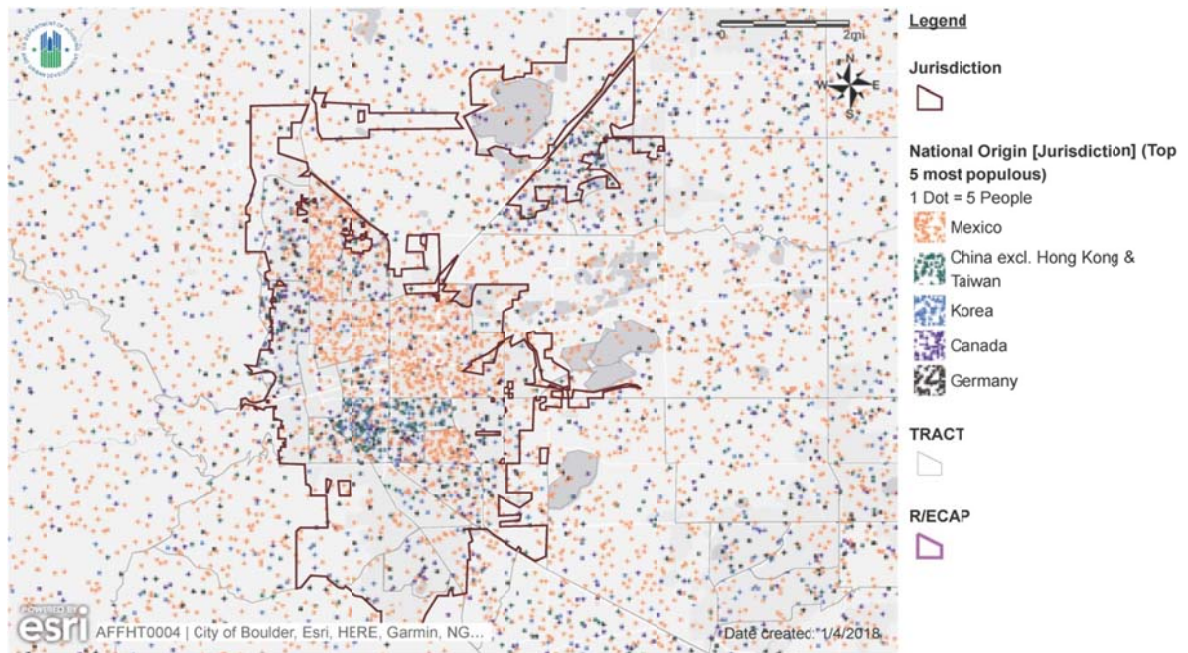
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-12.
Race/Ethnicity, 2010, City of Boulder



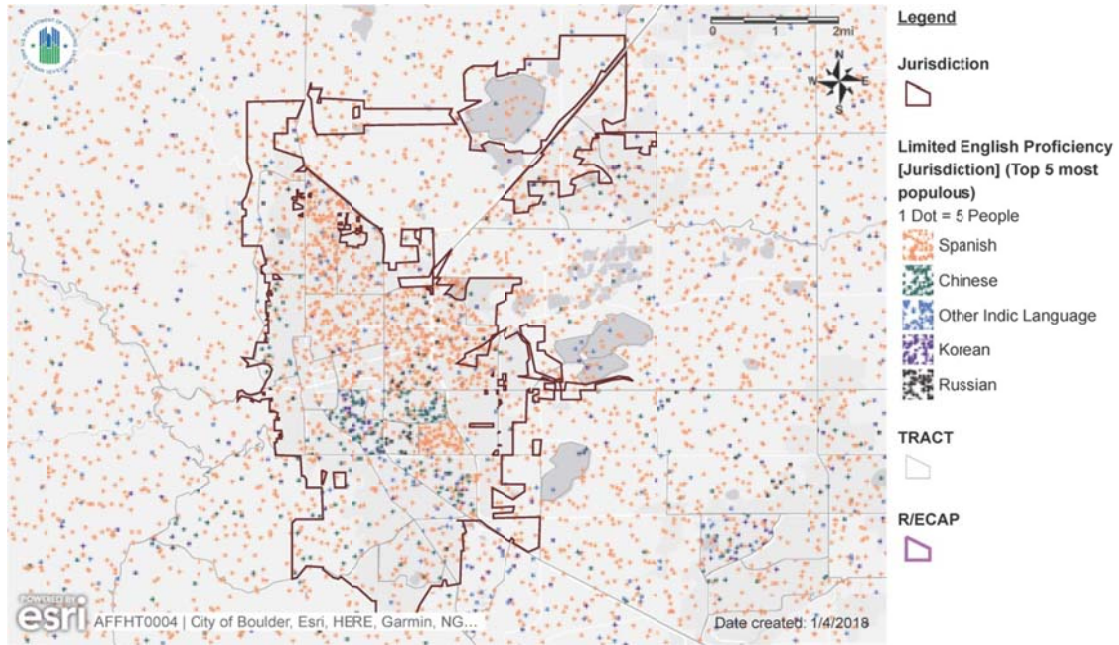
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-13.
National Origin, City of Boulder



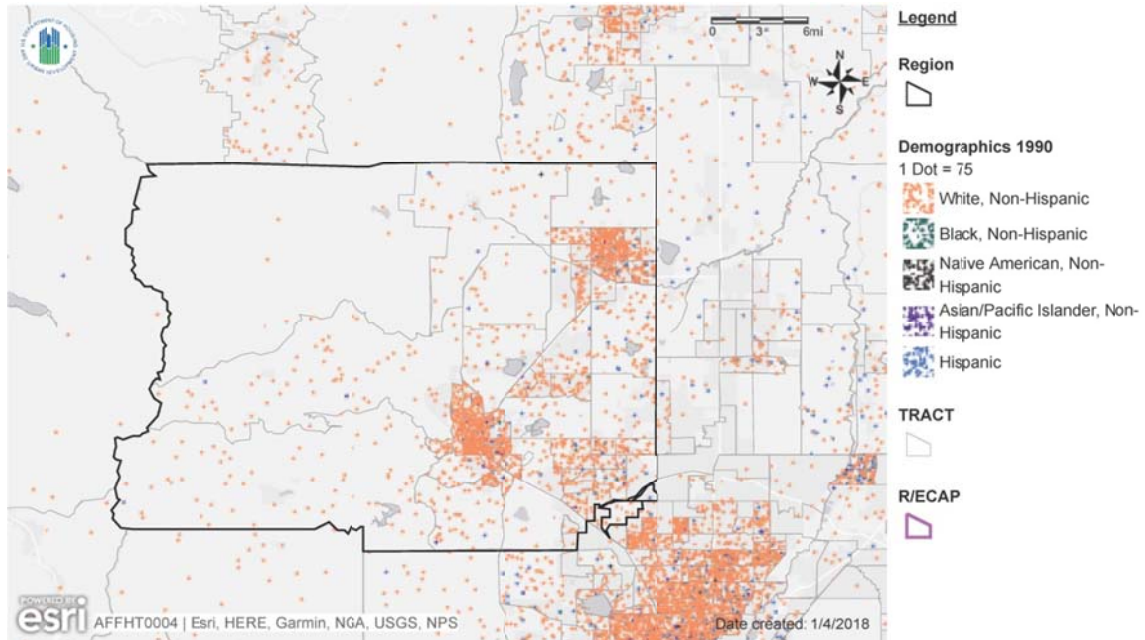
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-14.
Limited English Proficiency (LEP), City of Boulder



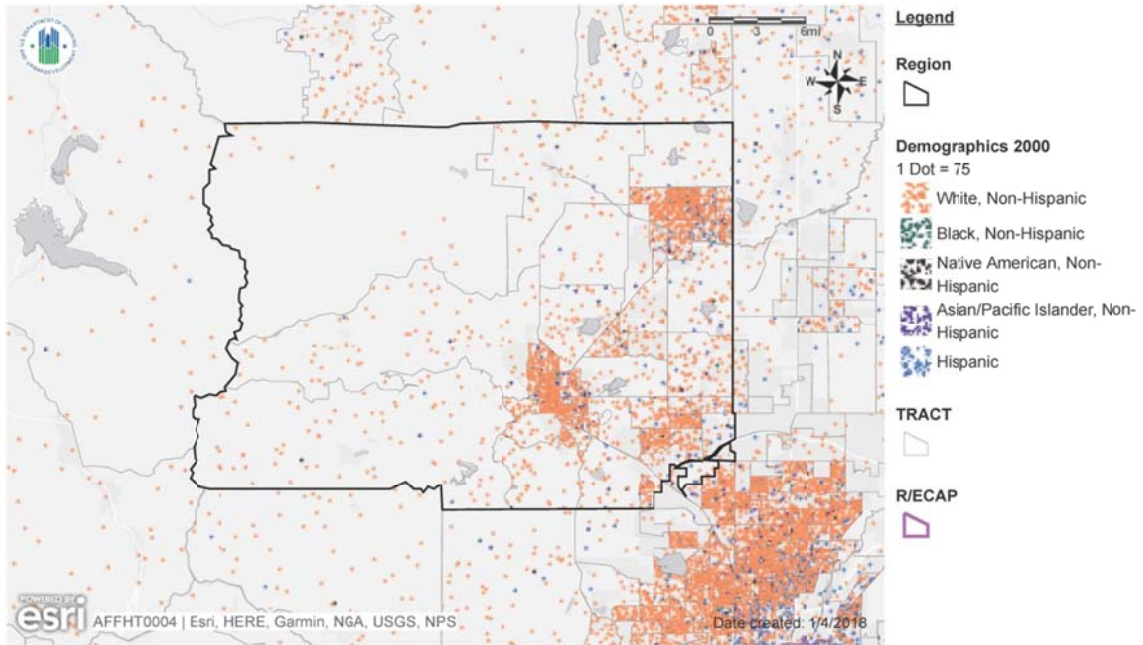
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-15.
Race/Ethnicity Trends, 1990, Boulder County



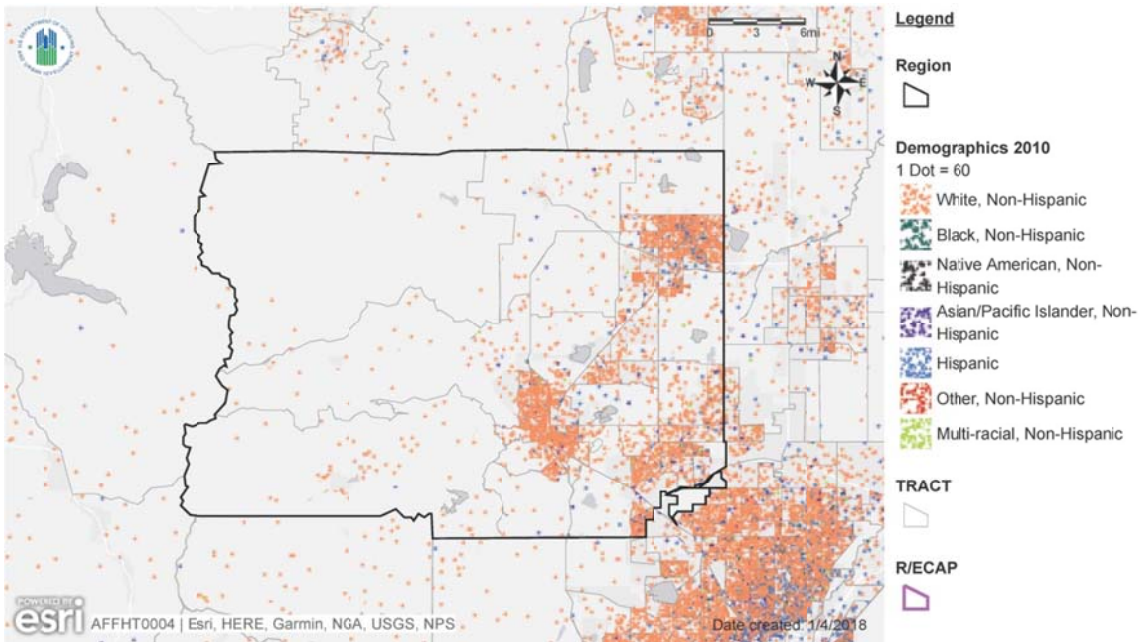
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-16.
Race/Ethnicity Trends, 2000, Boulder County



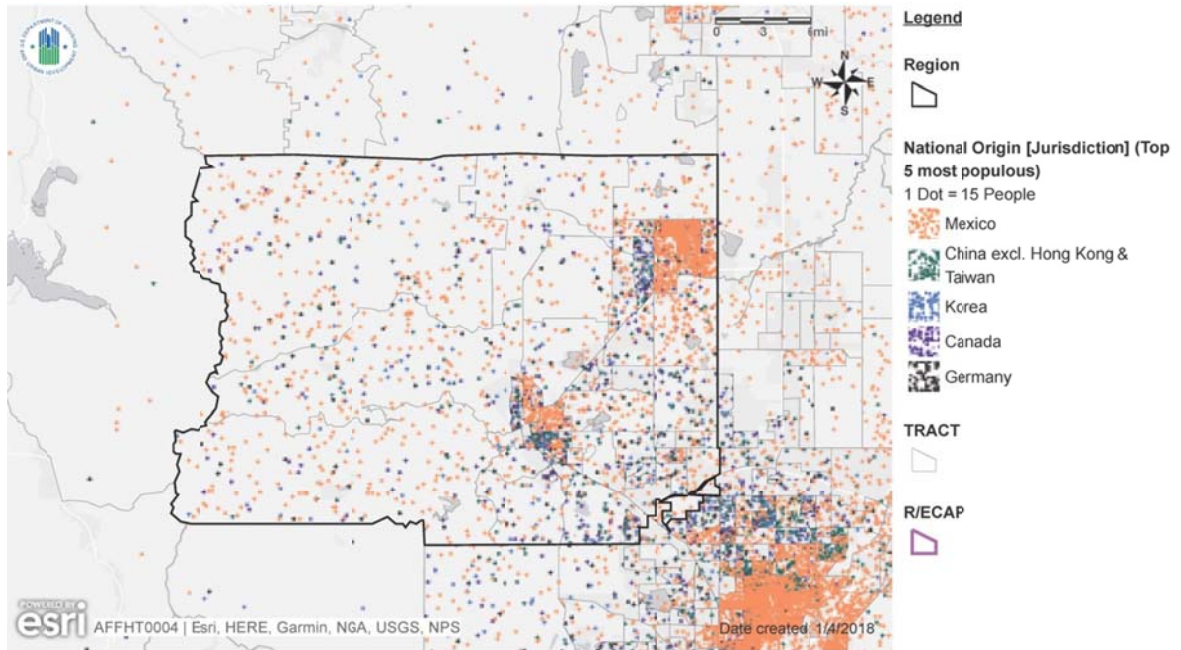
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-17.
Race/Ethnicity, 2010, Boulder County



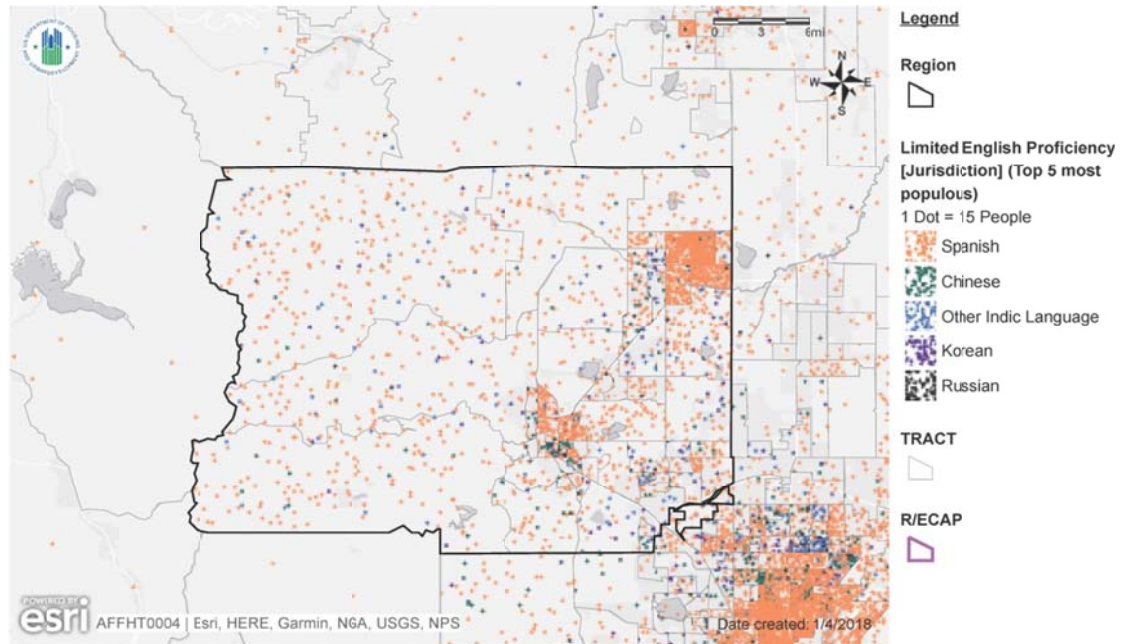
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-18.
National Origin, Boulder County



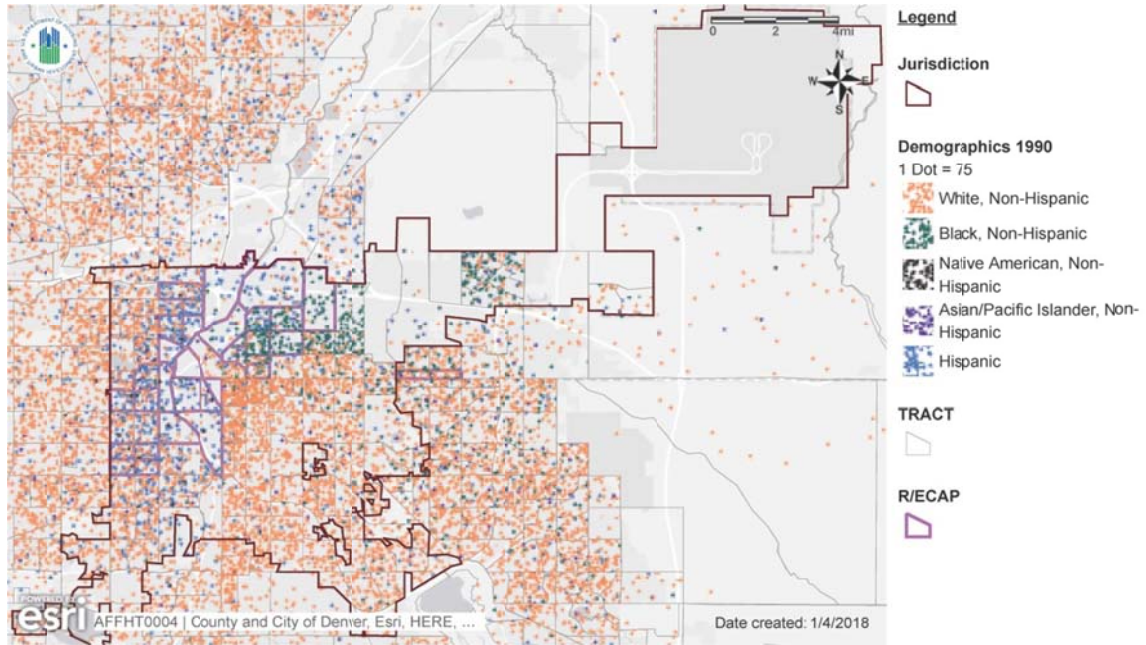
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-19.
Limited English Proficiency (LEP), Boulder County



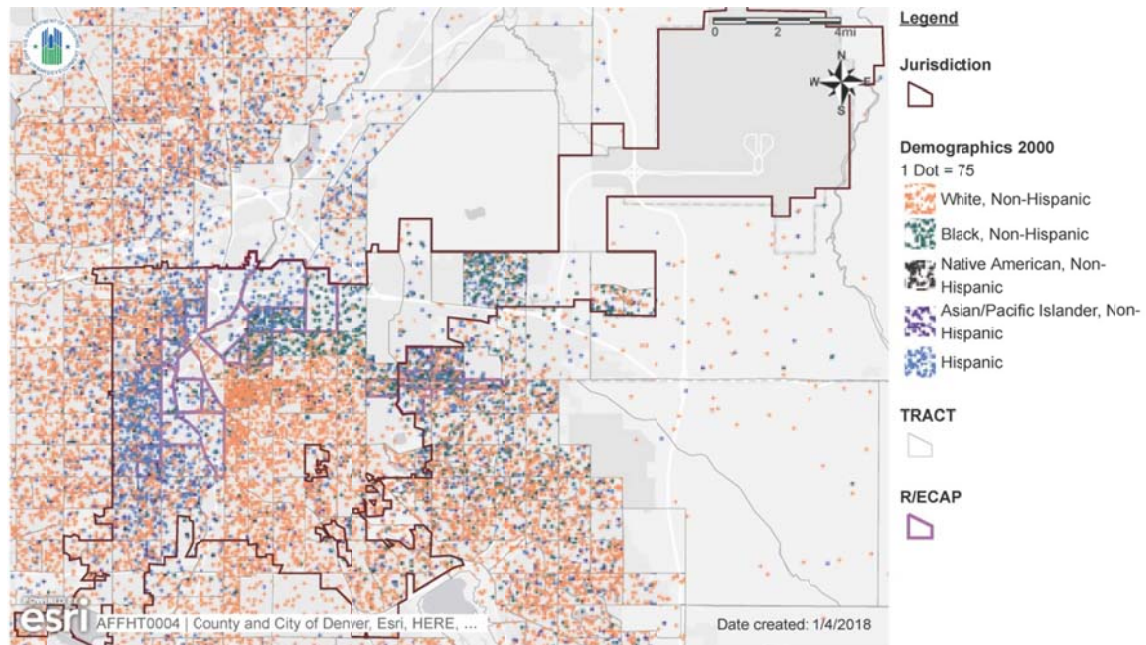
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-20.
Race/Ethnicity Trends, 1990, Denver



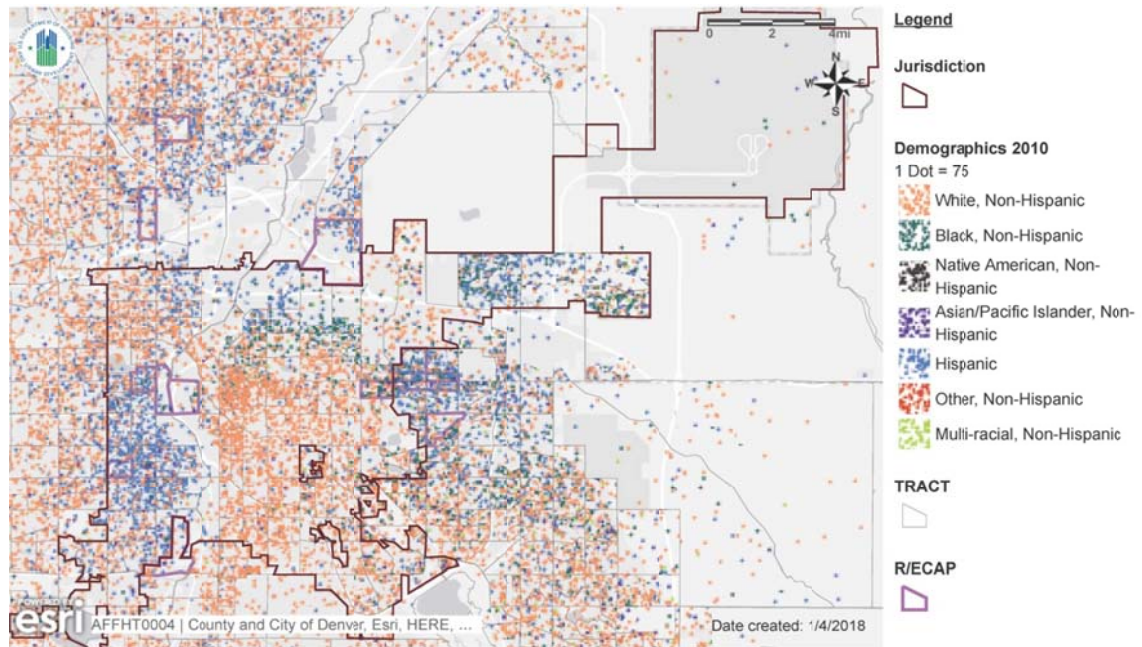
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-21.
Race/Ethnicity Trends, 2000, Denver



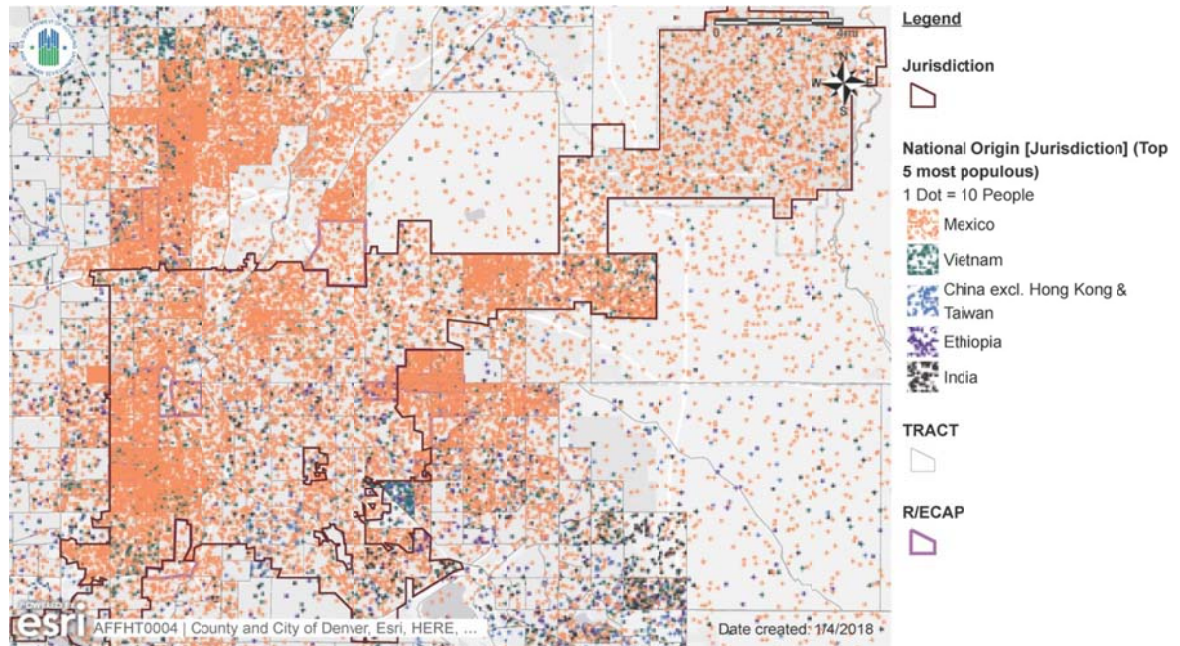
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-22.
Race/Ethnicity, 2010, Denver



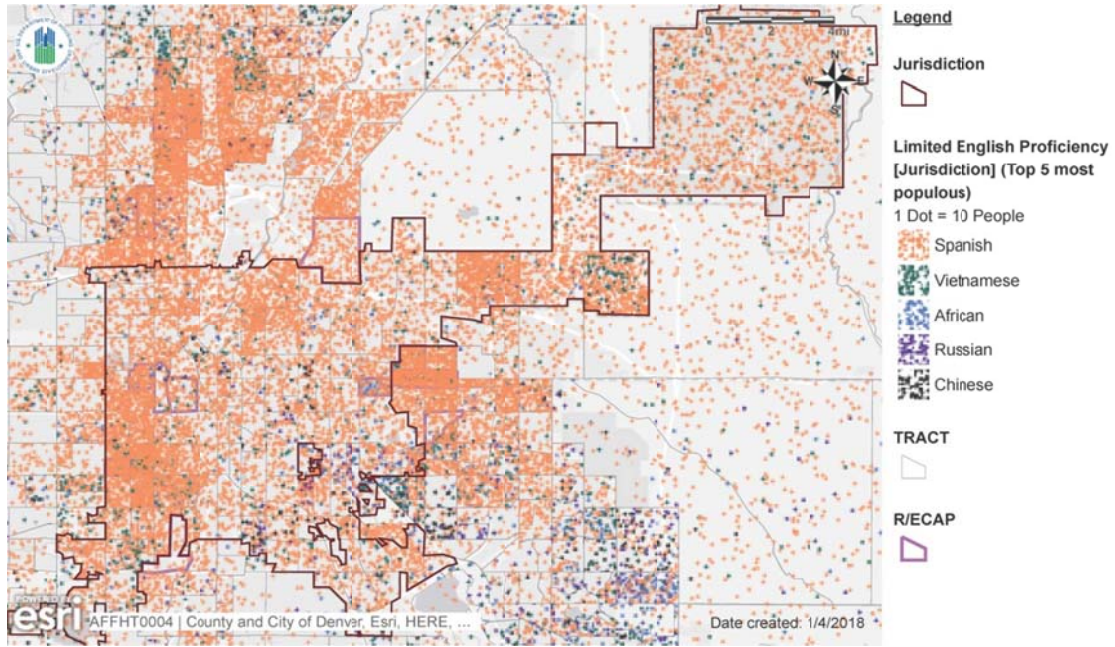
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-23.
National Origin, Denver



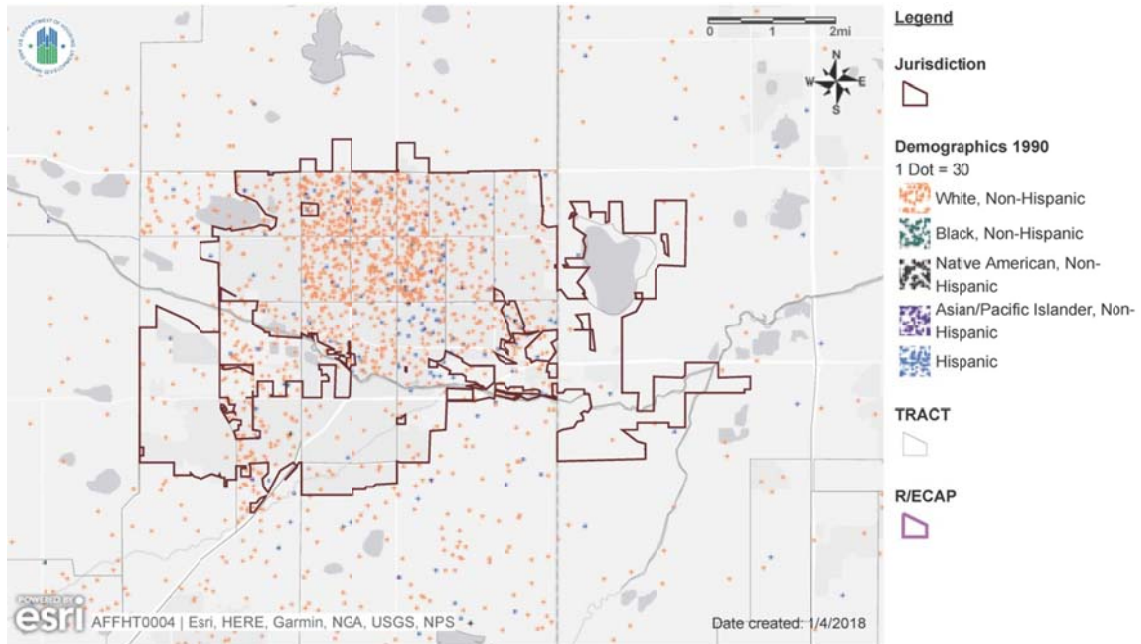
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-24.
Limited English Proficiency (LEP), Denver



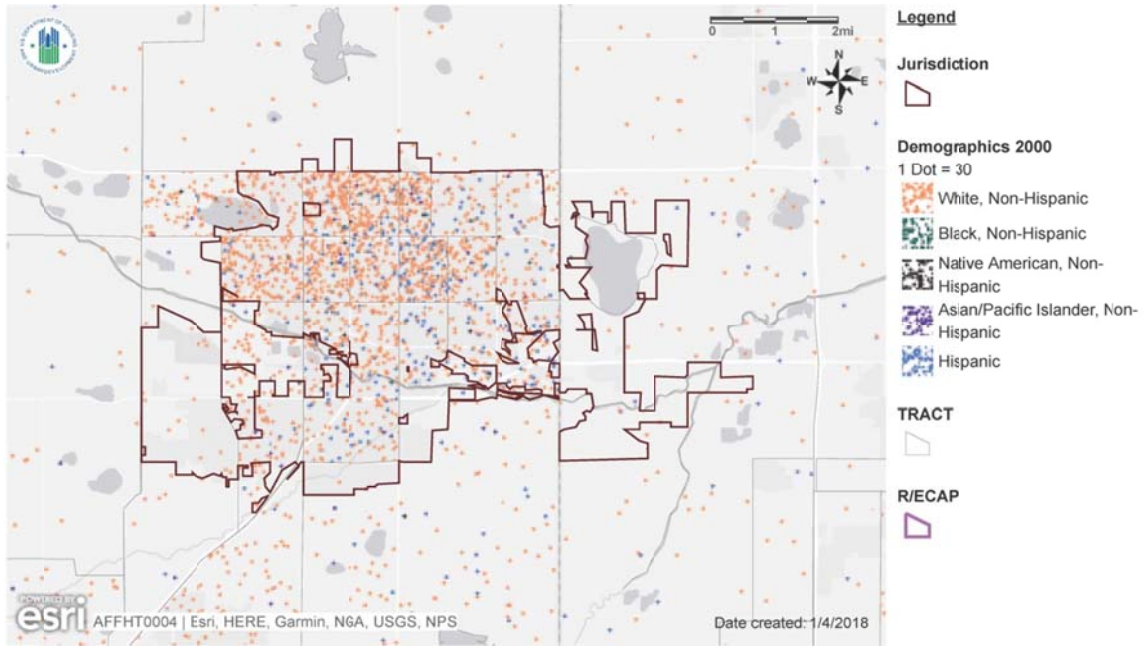
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-25.
Race/Ethnicity Trends, 1990, Longmont



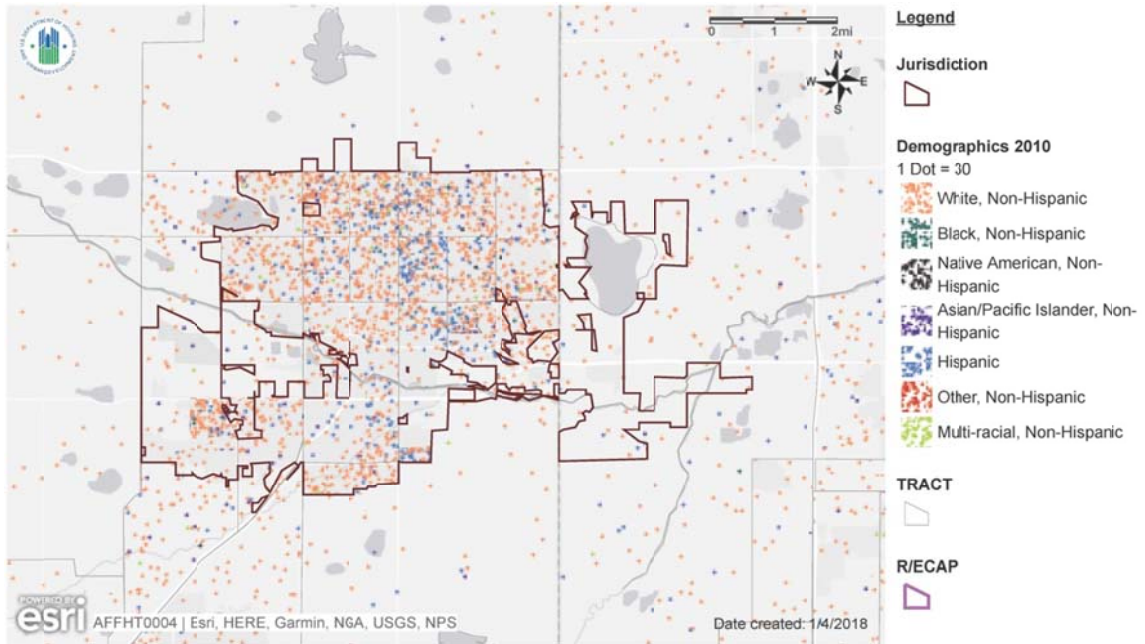
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-26.
Race/Ethnicity Trends, 2000, Longmont



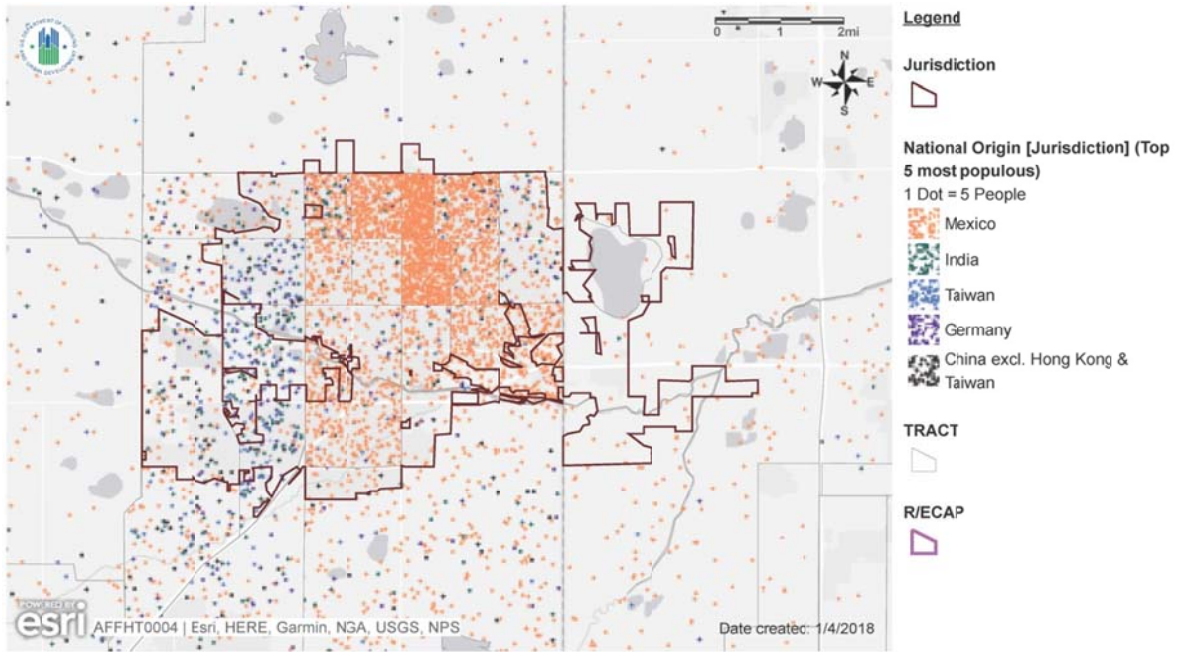
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-27.
Race/Ethnicity, 2010, Longmont



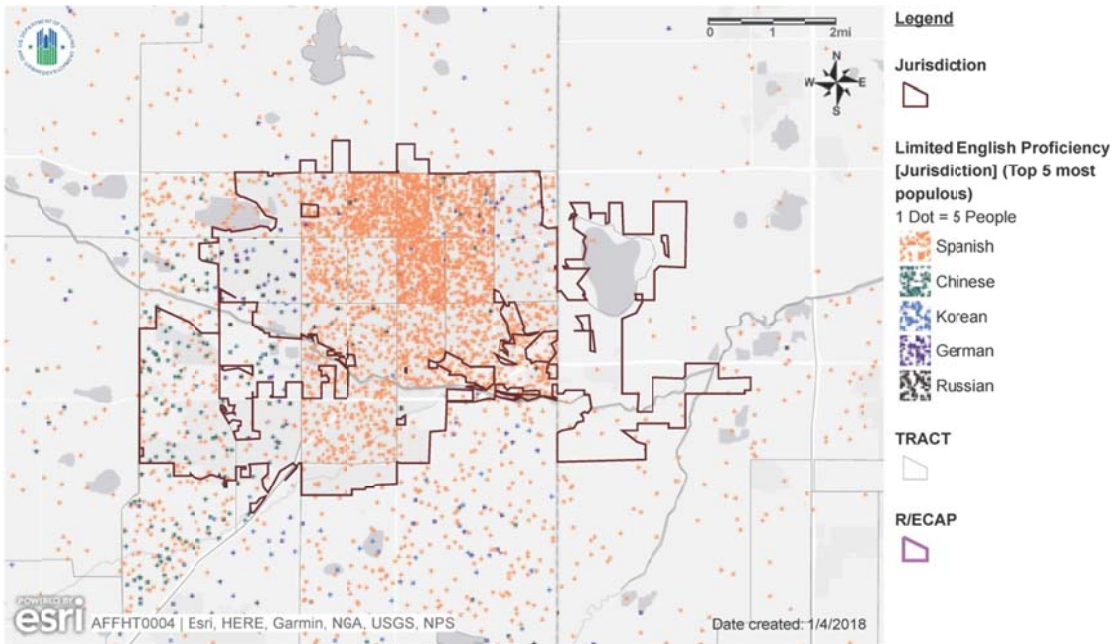
Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-28.
National Origin, Longmont



Source: HUD AFFH Data and Mapping Tool, version 4.

Figure II-29.
Limited English Proficiency (LEP), Longmont



Source: HUD AFFH Data and Mapping Tool, version 4.

Segregation and Integration

This section examines segregation in the region. It focuses on two types of outcomes that are a result of residential settlement patterns:

- Segregation based on race or ethnicity, and
- Segregation based on income (economic segregation).

It is important to note that income is not a protected class at the federal level, or in the state of Colorado or jurisdictions in the region.

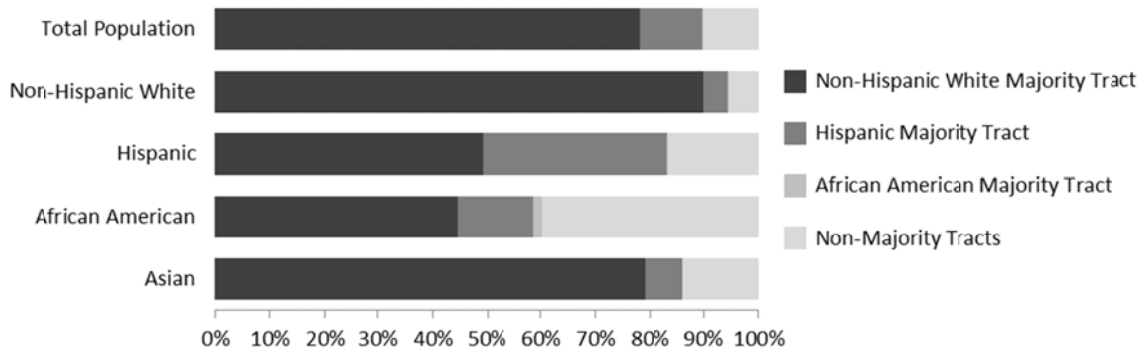
Racial and ethnic segregation. In the Denver region as a whole, about two-thirds of residents report their race and ethnicity as White, non-Hispanic white; 33 percent are minorities.

This history of segregation in the region is important not only to understand how residential settlement patterns came about—but, more importantly, to explain differences in housing opportunity among residents today. In sum, not all residents had the ability to build housing wealth or achieve economic opportunity. This historically unequal playing field in part determines why residents have different housing needs today.

However, Census data from 2010 show that few neighborhoods mirror that composition. Residents in the region are more likely to live near neighbors who share their race and ethnicity. Figure II-30 displays where different racial/ethnic groups live by Census tract majority (majority is defined as more than 50% of the tract population):

- In 2010, Hispanic residents were nearly three times as likely as the average resident to live in a Hispanic majority tract (34% of Hispanic residents lived in a Hispanic majority tract, compared to 12% of residents overall).
- African American residents were *ten times as likely as the average resident* to live in an African American majority tract (1.6% of African American residents lived in an African American majority tract, compared to 0.1% of residents overall).
- African Americans were also more likely than all other groups to live in a Census tract with no specific racial/ethnic majority.
- Ninety percent of non-Hispanic white residents lived in a Census tract that was majority non-Hispanic white, compared to 49 percent of Hispanic residents and 44 percent of African American residents.

Figure II-30.
Population Distribution by Census Tract Majority, Greater Denver Region, 2010



Note: There are no Asian majority Census tracts and there is only one African American majority tract in the Denver metro region. Non-majority tracts include all tracts in which no specific racial/ethnic group is a majority.

Source: 2010 Census, DRCOG and BBC Research & Consulting.

A common measure of segregation used in fair housing studies is the dissimilarity index (DI). The DI measures the degree to which two distinct groups are evenly distributed across a geographic area, usually a county. DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. The DI represents a “score” where values between 0 and 39 indicate low segregation, values between 40 and 54 indicate moderate segregation, and values between 55 and 100 indicate high levels of segregation.

It is important to note that the DI provided by HUD uses White, non-Hispanic residents as the primary comparison group. That is, all DI values compare racial and ethnic groups against the distribution of white, non-Hispanic residents. This is a logical approach for the Regional AI because White, non-Hispanic residents are the largest racial and ethnic group in the region.

Another limitation of the DI is that it can conceal practices that lead to racial and ethnic exclusion. Counties without much diversity typically have very low dissimilarity indices, while counties with the most diversity will show high levels of dissimilarity. Thus, a “low” dissimilarity index is not always a positive if it indicates that racial and ethnic minorities face barriers to entry in a community.

The DI for Regional AI partners as of the last decennial Census is shown in Figure II-31.

Denver has the highest level of segregation as measured by the DI, although its “High” rating falls on the low end of the “High” scale. Arapahoe County demonstrates moderate levels of segregation. Boulder and Broomfield Counties show low levels of segregation and these are partially related to the lack of diversity within these counties.

Figure II-31.
Dissimilarity Index, Counties that Include Regional AI Jurisdictions, 2010

County	Minority/NHW Dissimilarity Index		Hispanic/NHW Dissimilarity Index		African American/NHW Dissimilarity Index		Asian/NHW Dissimilarity Index	
	Index	Rating	Index	Rating	Index	Rating	Index	Rating
Adams County	0.32	Low	0.36	Low	0.49	Moderate	0.27	Low
Arapahoe County	0.36	Low	0.41	Moderate	0.47	Moderate	0.30	Low
Boulder County	0.28	Low	0.39	Low	0.18	Low	0.30	Low
Broomfield County	0.12	Low	0.21	Low	0.19	Low	0.20	Low
Denver County	0.49	Moderate	0.55	High	0.56	High	0.35	Low

Note: NHW is non-Hispanic white.

Source: 2010 Census and BBC Research & Consulting.

The DI for the greater region was unchanged between 2000 and 2010, as shown below.

Figure II-32.
**Dissimilarity Index,
 Denver Region, 2000
 and 2010**

Note:

Counties include: Adams,
 Arapahoe, Boulder, Broomfield,
 Denver, Douglas, and Jefferson.

Source:

2010 Census and BBC Research &
 Consulting.

	2000		2010	
	Index	Rating	Index	Rating
Total Minorities/NHW	0.44	Moderate	0.43	Moderate
African American/NHW	0.66	High	0.65	High
Hispanic/NHW	0.51	Moderate	0.49	Moderate
Asian/NHW	0.35	Low	0.36	Low
Pacific Islander/NHW	0.37	Low	0.38	Low
Native American/NHW	0.59	High	0.59	High

HUD-provided DI calculations based on the five-year American Community Survey (Figure II-33) through 2013 indicate that the DI has been increasing for the majority of Regional AI partners. Aurora's increase in segregation for residents of Hispanic origin is particularly notable. Denver's segregation index is the exception and has been stable or declined for all groups except for Asian residents.

**Figure II-33.
Racial/Ethnic Dissimilarity Trends, 1990 to 2013**

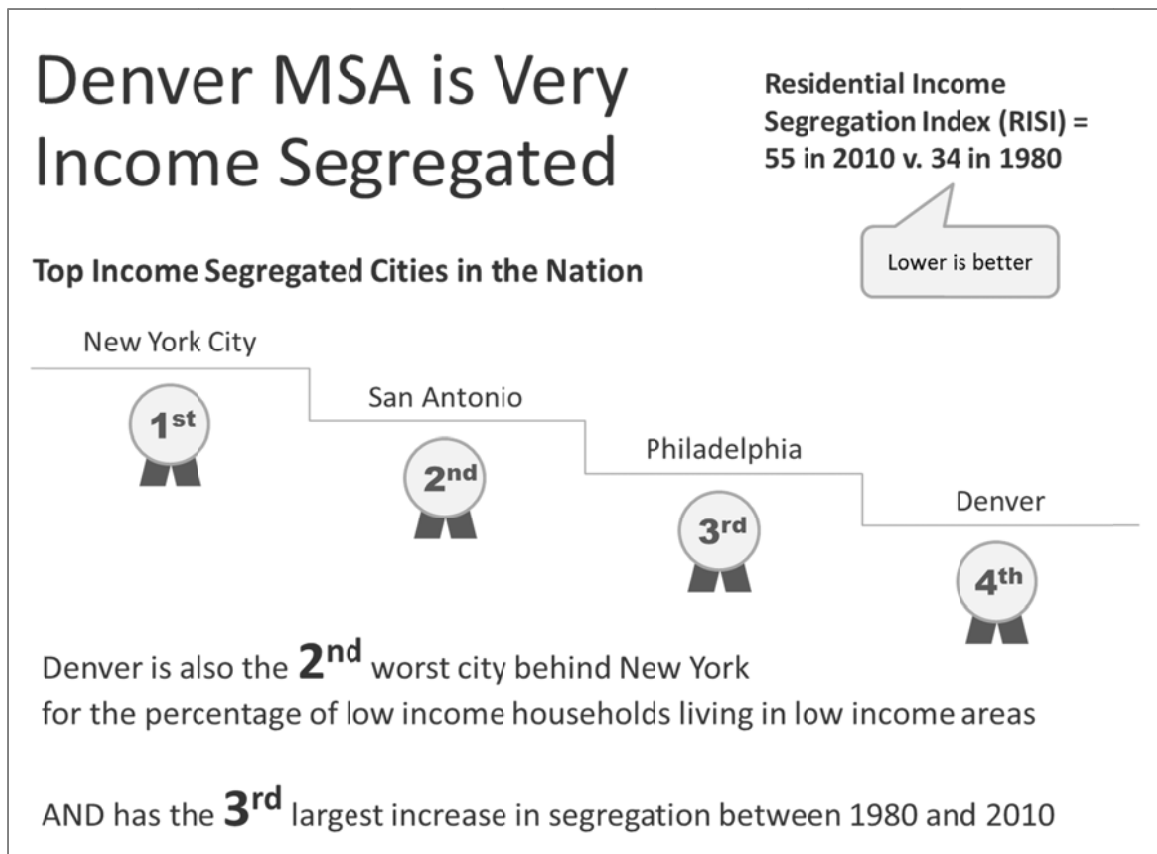
DI Comparison	City of Aurora					City and County of Denver					
	1990	2013	2013 Level	1990-2013 Trend		1990	2013	2013 Level	1990-2013 Trend		
Non-White/White	21.07	34.82	Low	Significant Increase		50.92	52.59	Moderate	Stable		
Black/White	28.39	32.24	Low	Increase		67.10	59.48	High	Decrease		
Hispanic/White	15.55	42.48	Moderate	Very Significant Increase		54.58	57.92	High	Stable		
Asian or Pacific Islander/White	17.07	23.94	Low	Significant Increase		31.17	39.84	Low to Moderate	Increase		
City of Boulder											
DI Comparison	1990	2013	2013 Level	1990-2013 Trend	Boulder County					1990-2013 Trend	
					1990	2013	2013 Level	1990	2013	2013 Level	
Non-White/White	24.55	29.40	Low	Increase	24.85	34.60	Low	21.80	30.25	Low	Significant Increase
Black/White	22.93	27.66	Low	Increase	29.93	24.75	Low	18.90	21.15	Low	Increase
Hispanic/White	24.00	32.55	Low	Significant Increase	30.96	43.27	Moderate	24.87	36.74	Low to Moderate	Significant Increase
Asian or Pacific Islander/White	31.60	32.82	Low	Stable	27.89	32.63	Low	19.02	34.60	Low	Significant Increase
City of Longmont											
DI Comparison	1990	2013	2013 Level	1990-2013 Trend	Boulder County					1990-2013 Trend	
					1990	2013	2013 Level	1990	2013	2013 Level	
Non-White/White	24.55	29.40	Low	Increase	24.85	34.60	Low	21.80	30.25	Low	Significant Increase
Black/White	22.93	27.66	Low	Increase	29.93	24.75	Low	18.90	21.15	Low	Increase
Hispanic/White	24.00	32.55	Low	Significant Increase	30.96	43.27	Moderate	24.87	36.74	Low to Moderate	Significant Increase
Asian or Pacific Islander/White	31.60	32.82	Low	Stable	27.89	32.63	Low	19.02	34.60	Low	Significant Increase

Source: HUD AFFH Data and Mapping Tool, version 4.

Economic segregation. A 2013 study by the Pew Research Center, *The Rise of Residential Segregation by Income*, uses a Residential Income Segregation Index (RISI) to evaluate income segregation by metropolitan area. The index adds the share of low income residents who live in a majority low income Census tract to the share of upper income residents living in a majority upper income Census tract. Higher indices indicate higher levels of segregation.

The RISI for the Denver metropolitan statistical area (MSA) was 55 in 2010, up considerably from 34 in 1980, showing a large increase in income segregation over the past 30 years.

The report finds that the Denver MSA—in addition to New York, San Antonio and Philadelphia—lead the 30 largest metros in the share of lower income households residing in majority lower income tracts.² The Denver MSA is just *second to New York* in the share of low income households who live in a majority low income Census tract. The Denver MSA also had the third largest increase in low income household segregation between 1980 and 2010.



In contrast, the Denver MSA ranked 10th of 30 areas for the proportion of high income households living in high income Census tracts. This suggests that the region's income segregation challenges are more significant with low income residents.

² The Pew report uses the Census defined Denver-Aurora-Broomfield definition of MSA.

Communities with high levels of income segregation also tend to have low rates of upward mobility. Among the largest 100 metro areas, Denver ranks 40th for upward mobility of below-median income families.³

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

HUD has developed a framework to examine economic opportunity at the neighborhood level, with a focus on racial and ethnic minorities. That focus is related to the history racial and ethnic segregation, which often limited economic opportunity.

“Racially or ethnically concentrated areas of poverty,” also known as R/ECAPs, are neighborhoods in which there are both racial concentrations and high poverty rates.

HUD’s definition of an R/ECAP is:

- A census tract that has a non-white population of 50 percent or more (majority-minority) or, for non-urban areas, 20 percent, AND a poverty rate of 40 percent or more; OR
- A census tract that has a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the county, whichever is lower.

Why R/ECAPs matter. The 40 percent poverty threshold used in the R/ECAP definition is based on research identifying this to be the point at which an area becomes socially and economically dysfunctional. Conversely, research has shown that areas with up to 14 percent of poverty have no noticeable effect on community opportunity.⁴

Households within R/ECAP tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. By definition, a significant number of R/ECAP households are financially burdened, which severely limits housing choice and mobility. The added possibility of racial or ethnic discrimination creates a situation where R/ECAP households are likely more susceptible to discriminatory practices in the housing market. Additionally, due to financial constraints and/or lack of knowledge (e.g., limited non-English information and materials), R/ECAP households encountering discrimination may believe they have little or no recourse, further exacerbating the situation.

It is very important to note that R/ECAPs are not areas of focus because of racial and ethnic concentrations alone. Many R/ECAPs, while not economically wealthy, are rich in culture, diversity, and community. R/ECAPs are meant to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity.

2010 R/ECAPs. An analysis of 2010 Census data found that the region had 37 R/ECAPs. Of these, the majority (20) were located in Denver County; eight were in Adams County, eight in

³ <http://www.equality-of-opportunity.org/>.

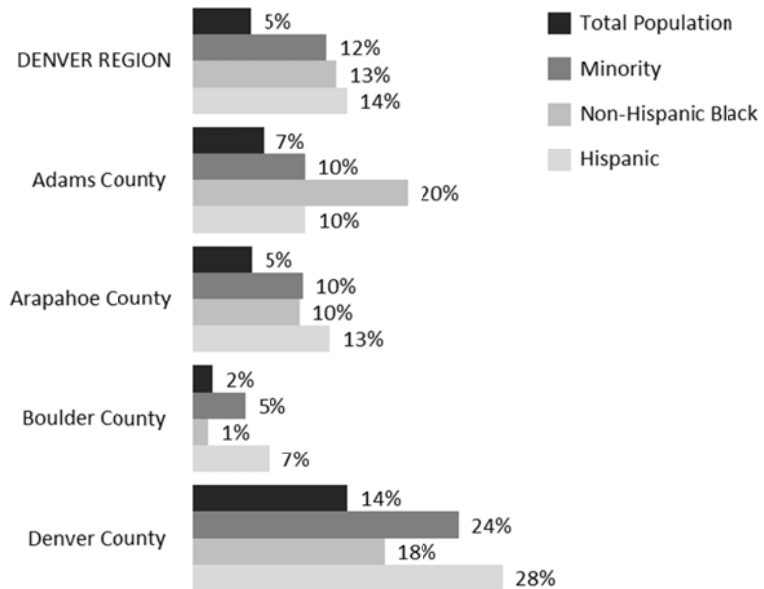
⁴ The Costs of Concentrated Poverty: Neighborhood Property Markets and the Dynamics of Decline.” In Nicolas P. Retsinas and Eric S. Belsky, eds., *Revisiting Rental Housing: Policies, Programs, and Priorities*. Washington, DC: Brookings Institution, 116–9.

Arapahoe County and one in Boulder County. Together, these R/ECAPs represented 5 percent of Census tracts in the region. About 150,000 people lived in R/ECAP neighborhoods in 2010—or 5 percent of region’s population.

Figure II-34, provides more detail on who lived in R/ECAPs in 2010. In Adams County, nearly 20 percent of African Americans lived in RCAPs or ECAPs and in Denver County, 28 percent of Hispanic residents live in RCAPs or ECAPs. Denver had the highest proportion of total residents living in RCAPs or ECAPs (14%).

Figure II-34.
Proportion of Residents
Living in RCAPs or ECAPs,
Denver Region, 2010

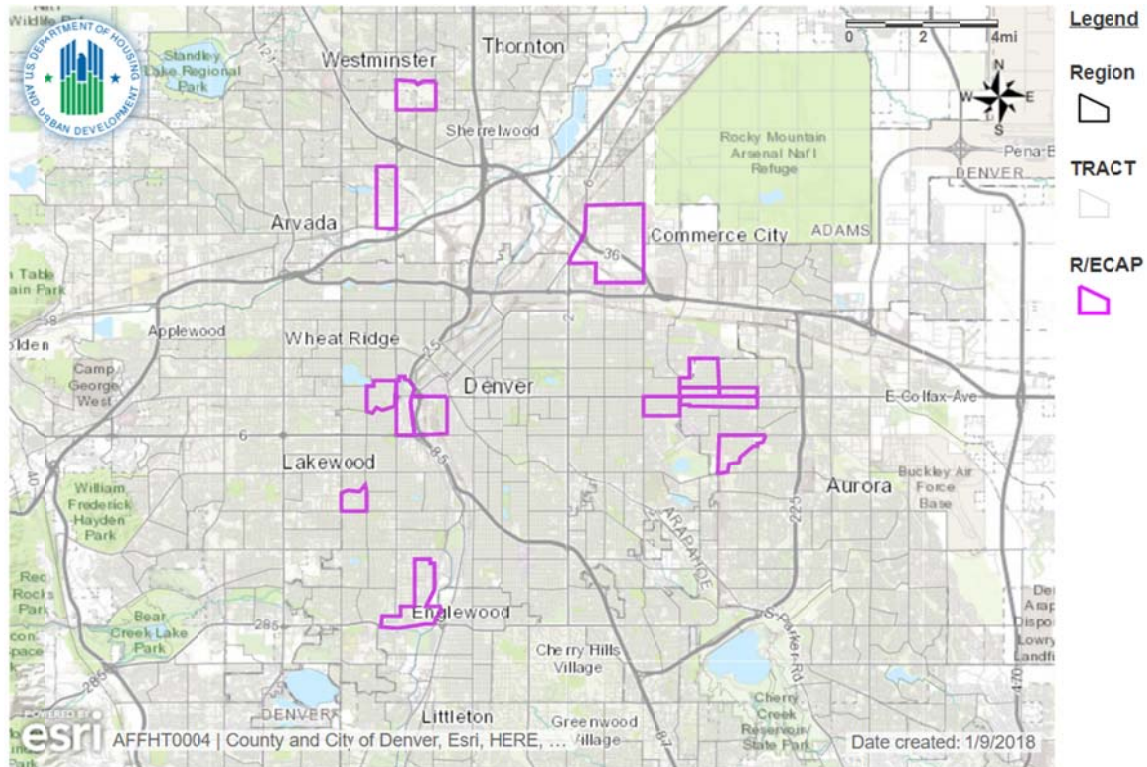
Source:
 2010 Census, DRCOG and BBC Research
 & Consulting.



Overall, nearly two-thirds (64%) of residents living in high-poverty census tracts are racial or ethnic minorities. This is nearly *twice* the proportion of racial or ethnic minorities in the region overall, meaning that racial and ethnic minorities are *significantly disproportionately likely* to live in high-poverty neighborhoods.

R/ECAP trends. The HUD data available in late 2017 for fair housing studies (based on 5-year ACS data) identified 14 Census tracts as R/ECAPs. This is down from the 37 identified in 2010 and represents just 2 percent of all Census tracts (down from 5%). Among the people living in R/ECAPs now, 38 percent are in Aurora, 34 percent are in Denver, and the remaining residents are in Westminster, Federal Heights, Commerce City, Englewood, or Sheridan.

Figure II-35.
Locations of R/ECAPs, Denver Region, 2016



Source: HUD AFFH Data and Map tool and BBC Research & Consulting.

Residents living in the region’s R/ECAPs today are still likely disproportionately likely to be racial and ethnic minorities—and African Americans are most impacted. These residents are most likely to be Hispanic (29%), Asian (26%), and African American (23%) and originating in Mexico (10%) and China (8%). Compared to the region overall, African Americans are much more likely to live in R/ECAPs than expected (23% live in R/ECAPs compared to just 8% of residents in the region overall). Hispanic and Asian residents are also slightly overrepresented in R/ECAPs, but only slightly.

Poverty in context of R/ECAPs. In 2010, 12 percent of Denver region residents lived in poverty—a significant difference from the 40 percent poverty rate in R/ECAPs. This means that poverty in the region is very low overall—and where it exists, it is heavily concentrated in certain neighborhoods, mostly located in Aurora and Denver.

Poverty afflicts children more than any other cohort, as demonstrated in the figure below. This should be a significant concern for economic development interests. When nearly 20 percent of children live in poverty, this has implications on workforce capabilities and economic growth.

**Figure II-36.
Poverty by Age Range, Denver Region and by County, 1990-2010**

	Percent of Children in Poverty				Percent of 18-64 Year Olds in Poverty				2000-2010		1990-2010	
	1990		2010		1990		2010		Percentage	Point Change	Percentage	Point Change
	1990	2000	1990	2010	1990	2000	1990	2010	1990-2010	2000-2010	1990-2010	2000-2010
DENVER REGION	13%	10%	16%	3%	9%	8%	11%	2%	3%	2%	3%	3%
Adams County	15%	11%	20%	6%	9%	8%	12%	3%	4%	3%	4%	4%
Arapahoe County	8%	7%	16%	8%	5%	5%	10%	5%	5%	5%	5%	5%
Boulder County	9%	8%	13%	3%	12%	10%	14%	2%	3%	2%	3%	3%
Broomfield County	N/A	N/A	5%	N/A	N/A	N/A	6%	N/A	N/A	N/A	N/A	N/A
Denver County	27%	21%	29%	1%	15%	13%	17%	2%	4%	2%	4%	4%
Percent of Older Adults in Poverty												
	1990		2010		1990-2010		2000-2010		Cohort with Highest Poverty Rate, 2010			
	1990	2000	1990	2010	1990-2010	2000-2010	Percentage	Point Change	Percentage	Point Change	Percentage	Point Change
DENVER REGION	5%	7%	9%	4%	2%	16%	Children	16%	Children	20%	Children	16%
Adams County	5%	7%	9%	4%	1%	20%	Children	20%	Children	16%	Children	14%
Arapahoe County	3%	5%	10%	7%	5%	16%	Children	16%	Children	14%	18-64 year olds	6%
Boulder County	5%	6%	5%	0%	-1%	14%	18-64 year olds	14%	18-64 year olds	6%	18-64 year olds	29%
Broomfield County	N/A	N/A	5%	N/A	N/A	N/A	Children	6%	Children	5%	Children	5%
Denver County	7%	10%	14%	8%	5%	29%	Children	29%	Children	5%	Children	5%

Note: Boulder County's poverty rate reflects college students..

Source: DRCOG and 2006-2010 ACS.

Characteristics of R/ECAPs Aurora and Denver both have five R/ECAPs, but Aurora has a larger proportion of residents living in R/ECAPs. Unlike other areas in the region, almost all of Aurora's R/ECAPs are clustered together in the same neighborhood, East Colfax.

East Colfax is located in northwestern Aurora and is the longest commercial corridor in the metropolitan region. Prior to the construction of Interstate 70 in 1965, Colfax Avenue was the primary east/west transportation corridor. Its modern-day land use still reflects its former status: An abundance of motor coach motels—that largely operate as affordable housing of last resort—can be found on both sides of the Denver/Aurora border. Numerous car-oriented businesses and retail complement the motels as the rest of the land use.

One R/ECAP is particularly notable for its concentration of immigrants and extremely low income residents. The East Colfax census tract 004404, located in the City and County of Denver, is between Quebec Street to the west and Yosemite Boulevard to the east and 11th Avenue to the south and Colfax to the north. This neighborhood was identified as the 4th most vulnerable to gentrification in the City of Denver's 2016 *Mitigating Gentrification* report.

In 2010, of the 5,978 total residents 24 percent were Hispanic, 30 percent were African American, 19 percent were Asian and 26 percent were White. The most significant changes to demographics since the 2000 census is the increase of Asian residents, up to 19 percent from 2 percent—with a corresponding loss of African American and White residents. In 1990, this Census tract was not considered an R/ECAP and had an over 50 percent population of White residents.

The remaining R/ECAPs in Denver are clustered together in the Lincoln Park, West Colfax, and Sun Valley neighborhoods. These neighborhoods have traditionally been areas of affordable and publicly-subsidized housing and are also at risk of significant gentrification and change. Altogether, these R/ECAPs contain more than 14,000 residents. These areas are largely Hispanic (67%). About one-fifth are LEP residents. The most common country of origin is Mexico.

Other R/ECAPs in the region. The remaining four R/ECAPs are not located in Denver, Aurora, or Boulder, but are in close proximity to these jurisdictions.

Two R/ECAPs border the City and County of Denver. The first, Census tract 87.09, is located in Commerce City, north of the Park Hill neighborhood and south of Highway 2. This R/ECAP is adjacent to the Elyria Swansea neighborhood, the Sand Creek Landfill, and industrial warehouses. The primary land uses inside the census tract are residential, commercial, and industrial.

The Commerce City R/ECAP has the largest population out of any R/ECAP in the region, with a total population of 7,656. It also has one of the largest proportions of Hispanic residents—70 percent of the population is Hispanic and 24 percent is White, non-Hispanic, and 4 percent Black/African American.

The other R/ECAP that borders Denver is Census tract 55.51. This R/ECAP crosses over Englewood and Sheridan and is bound by South Zuni Street and Highway 285. The census tract is

largely industrial and residential, with just over 3,200 residents. The residents are 49 percent Hispanic, 39 percent White, non-Hispanic, and 6 percent Black/African American.

The remaining two R/ECAPs (93.20 and 96.06) in the region are located in Adams County, along Federal Boulevard, and both have a population of 2,700.

Census tract 93.20 crosses over Westminster and Federal Heights and is bound by Federal Boulevard and North Pecos Street. This R/ECAP has a water park, a large recreational park, commercial, and residential (including mobile homes). The percent of Hispanic residents is roughly equal to the percent of White, non-Hispanic residents—47 percent and 45 percent, respectively.

Census tract 96.06 is in Berkley and also partially in Westminster. It is bound by Federal Boulevard and Lowell Boulevard. This Census tract includes the Westminster light rail station, commercial along Federal, and residential. The residents are 62 percent Hispanic, 31 percent White, non-Hispanic and 4 percent Asian/Pacific Islander.

These four Census tracts have similar characteristics to those in Denver and Aurora with large proportions of Hispanic residents, particularly from Mexico. Land use is dominated by low-income and often substandard residential, declining commercial and retail, and industrial.

Why racial/ethnic concentrations exist. A recent report by the Manhattan institute shows that segregation in most American cities has been declining since a peak in the mid-twentieth century. At that time, both government policies and market forces contributed to neighborhood segregation. Policy reform, shifts in racial attitude, gentrification of urban areas and integration of suburbs have all contributed to the overall decline in segregation.⁵ Even so, racial concentrations persist in many neighborhoods due to a multitude of reasons including neighborhood history, immigration patterns, economic mobility and actual/perceived racism.

In this region, growth controls are a major contributor to concentrations. One of the most significant contributors to racial concentration in Denver was the Poundstone Amendment. The goal of this amendment, passed in the mid-1970s, was to prevent the City of Denver from expanding, for fear that Denver Public Schools would reach into suburban areas.

Another significant influence on Denver's diversity was a requirement that city employees live in the city. This policy was intended to spur development in the city and, because many city workers are racially and ethnically diverse, created demand for new housing in developing areas like Green Valley Ranch. This neighborhood has maintained racial and ethnic diversity and currently houses one of DPS' highest demand schools.

Aurora's unique diversity is linked to its many residential offerings and affordability. The city has a mix of urban, suburban, and rural neighborhoods and price diversity unparalleled in the region.

⁵ https://www.manhattan-institute.org/html/cr_66.htm

Trends that could affect diversity and segregation. How diversity and segregation change in the future will depend on how the region continues to grow. In-migration at the state level has been strong, but still lags the consistently strong growth that occurred during most of the 1990s. Most importantly, those residents who migrated to the state in the 1990s are now aging.

Thus, the most predictable pattern in the future is an aging population. Colorado has the third fastest growth of seniors in the U.S. Public revenues are expected to slow as residential property taxes are depressed by homestead exemptions. This will occur when demands on public services are increasing.

Boulder County, in particular, is aging quickly. Natural increase has fallen steeply in recent years. Boulder County seniors will increase from about 40,000 currently to 75,000 in 2030, comprising 20 percent of residents, compared to 13 percent now. This will put increased pressure on affordability because seniors tend to remain in their homes longer than other age groups. Racial and economic diversity is expected to decline as a result of population stagnation and lack of housing opportunities in the county.

Denver, to the extent it can continue to grow upward (and outward near DIA), and Aurora, which has far more opportunity to develop homes, are likely to see increases in housing demand. These cities will need to adapt to accommodate a wide range of household types, including extended families, and low income households, by continuing to diversify housing products. To wit: if 2010 poverty rates remain constant, the increase in the numbers of individuals living in poverty in the region will increase to 141,000 by 2040. The increase is forecast to be most significant in Denver, followed by Aurora.

SECTION III.

Disproportionate Housing Needs

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Disproportionate Housing Needs

Changes in housing prices in the region have been sudden, and steep, and affected all areas of the Denver-Aurora-Boulder area, and much of the Front Range. At the time this section was prepared, the jurisdictions were in the process of updating needs studies and preparing housing strategies to address those needs. This section does not restate the findings from those studies. Instead, it focuses on a subset of needs: the areas where needs disproportionately affect certain resident groups.

This section covers:

- The disproportionate impact of housing costs on resident groups;
- Disparities in homeownership;
- How rental cost increases are affecting resident groups;
- Who occupies publicly assisted housing;
- Overall needs as reported by respondents to the survey and focus groups; and
- Housing discrimination.

This section begins with an overview of disproportionate needs based on HUD-provided data. This follows with a disproportionate needs analysis using primary data collected through surveys and focus groups.

Overall Housing Needs

HUD provides data tables as a starting point in assessing the differences in housing needs among household groups. “Housing problems” are defined as units having incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and households with cost burden greater than 30 percent. “Severe” housing problems include all of the above except that cost burden is greater than 50 percent.

Figures III-1 through III-4 present the demographics of residents with housing needs by the jurisdictions for which data are available. The first part of the table shows households experiencing any housing problems; the second part shows households experiencing *severe* problems only.

The housing problems represent affordability challenges (“cost burden,” paying more than 30 percent of income in housing costs) and substandard condition of housing units. It is important to note that because housing cost burden affects many more households than condition challenges, the data primarily represent affordability needs.

The tables show that:

- In Boulder and Longmont, Hispanic households are much more likely to face housing problems than residents of other races. In Longmont, Hispanics face challenges at nearly twice the rate of White, non-Hispanic households. Large families and “non” families (single person households and residents living with unrelated roommates) also face high rates of housing problems.
- In Aurora, African American and Hispanic households face the highest rates of housing challenges, in addition to large families. More than half of these households have housing problems. White, non-Hispanic residents are the only group with housing problems affecting fewer than 40 percent of households.
- In Denver, high rates of housing problems are prevalent across races and ethnicities except for White, non-Hispanic and Asian residents. Large families face very high housing problems, with 61 percent facing cost burden and/or condition issues, compared with 31 percent for smaller families.

**Figure III-1.
Demographics of Households with Disproportionate Housing Needs, Aurora**

Households Experiencing any of 4 Housing Problems	(Aurora, CO CDBG, HOME, ESG) Jurisdiction			(Denver-Aurora-Lakewood, CO) Region		
	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	22,860	69,838	32.73%	227,745	742,148	30.69%
Black, Non-Hispanic	10,460	18,963	55.16%	27,691	53,604	51.66%
Hispanic	14,070	24,309	57.88%	81,886	163,971	49.94%
Asian or Pacific Islander, Non-Hispanic	2,214	5,227	42.36%	11,163	31,160	35.82%
Native American, Non-Hispanic	273	595	45.88%	1,836	4,113	44.64%
Other, Non-Hispanic	1,574	3,077	51.15%	6,831	16,512	41.37%
Total	51,450	122,040	42.16%	357,195	1,011,575	35.31%
Household Type and Size						
Family households, <5 people	23,430	65,719	35.65%	155,500	545,479	28.51%
Family households, 5+ people	8,380	14,115	59.37%	43,431	93,088	46.66%
Non-family households	19,645	42,195	46.56%	158,245	373,025	42.42%
Households Experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	10,124	69,838	14.50%	100,508	742,148	13.54%
Black, Non-Hispanic	5,589	18,963	29.47%	15,369	53,604	28.67%
Hispanic	8,599	24,309	35.37%	46,172	163,971	28.16%
Asian or Pacific Islander, Non-Hispanic	1,199	5,227	22.94%	5,943	31,160	19.07%
Native American, Non-Hispanic	183	595	30.76%	1,031	4,113	25.07%
Other, Non-Hispanic	688	3,077	22.36%	3,733	16,512	22.61%
Total	26,395	122,040	21.63%	172,765	1,011,575	17.08%

Note: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Source: CHAS.

**Figure III-2.
Demographics of Households with Disproportionate Housing Needs, City of Boulder and Boulder County**

Households Experiencing any of 4 Housing Problems	(Boulder, CO CDBG) Jurisdiction			(Boulder, CO) Region		
	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	15,225	35,440	42.96%	35,240	101,300	34.79%
Black, Non-Hispanic	139	299	46.49%	339	864	39.24%
Hispanic	1,564	2,734	57.21%	6,150	11,515	53.41%
Asian or Pacific Islander, Non-Hispanic	795	1,754	45.32%	1,610	4,443	36.24%
Native American, Non-Hispanic	10	33	30.30%	109	246	44.31%
Other, Non-Hispanic	470	865	54.34%	970	2,133	45.48%
Total	18,195	41,125	44.24%	44,420	120,520	36.86%
Household Type and Size						
Family households, <5 people	4,010	16,270	24.65%	15,740	62,705	25.10%
Family households, 5+ people	545	1,273	42.81%	3,740	8,064	46.38%
Non-family households	13,640	23,580	57.85%	24,940	49,745	50.14%
Households Experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	9,725	35,440	27.44%	18,690	101,300	18.45%
Black, Non-Hispanic	85	299	28.43%	215	864	24.88%
Hispanic	1,160	2,734	42.43%	3,825	11,515	33.22%
Asian or Pacific Islander, Non-Hispanic	470	1,754	26.80%	910	4,443	20.48%
Native American, Non-Hispanic	0	33	0.00%	18	246	7.32%
Other, Non-Hispanic	295	865	34.10%	694	2,133	32.54%
Total	11,735	41,125	28.53%	24,355	120,520	20.21%

Note: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Source: CHAS.

**Figure III-3.
Demographics of Households with Disproportionate Housing Needs, City and County of Denver**

Households Experiencing any of 4 Housing Problems	(Denver, CO CDBG, HOME, ESG) Jurisdiction			(Denver-Aurora-Lakewood, CO) Region		
	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	53,530	169,915	31.50%	227,745	742,148	30.69%
Black, Non-Hispanic	12,920	24,710	52.29%	27,691	53,604	51.66%
Hispanic	30,650	57,390	53.41%	81,886	163,971	49.94%
Asian or Pacific Islander, Non-Hispanic	2,677	7,757	34.51%	11,163	31,160	35.82%
Native American, Non-Hispanic	569	1,339	42.49%	1,836	4,113	44.64%
Other, Non-Hispanic	1,825	4,940	36.94%	6,831	16,512	41.37%
Total	102,195	266,070	38.41%	357,195	1,011,575	35.31%
Household Type and Size						
Family households, <5 people	33,850	108,490	31.20%	155,500	545,479	28.51%
Family households, 5+ people	11,925	19,550	61.00%	43,431	93,088	46.66%
Non-family households	56,415	138,020	40.87%	158,245	373,025	42.42%
Households Experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	25,590	169,915	15.06%	100,508	742,148	13.54%
Black, Non-Hispanic	7,610	24,710	30.80%	15,369	53,604	28.67%
Hispanic	18,090	57,390	31.52%	46,172	163,971	28.16%
Asian or Pacific Islander, Non-Hispanic	1,609	7,757	20.74%	5,943	31,160	19.07%
Native American, Non-Hispanic	344	1,339	25.69%	1,031	4,113	25.07%
Other, Non-Hispanic	1,155	4,940	23.38%	3,733	16,512	22.61%
Total	54,400	266,070	20.45%	172,765	1,011,575	17.08%

Note: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Source: CHAS.

Figure III-4.
Demographics of Households with Disproportionate Housing Needs, Longmont and Boulder County

Households Experiencing any of 4 Housing Problems	(Longmont, CO CDBG) Jurisdiction			(Boulder, CO) Region		
	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	7,995	25,875	30.90%	35,240	101,300	34.79%
Black, Non-Hispanic	78	253	30.83%	339	864	39.24%
Hispanic	3,370	5,950	56.64%	6,150	11,515	53.41%
Asian or Pacific Islander, Non-Hispanic	369	909	40.59%	1,610	4,443	36.24%
Native American, Non-Hispanic	80	177	45.20%	109	246	44.31%
Other, Non-Hispanic	164	372	44.09%	970	2,133	45.48%
Total	12,065	33,550	35.96%	44,420	120,520	36.86%
Household Type and Size						
Family households, <5 people	5,275	18,520	28.48%	15,740	62,705	25.10%
Family households, 5+ people	2,015	3,830	52.61%	3,740	8,064	46.38%
Non-family households	4,775	11,200	42.63%	24,940	49,745	50.14%
Households Experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	3,630	25,875	14.03%	18,690	101,300	18.45%
Black, Non-Hispanic	44	253	17.39%	215	864	24.88%
Hispanic	2,085	5,950	35.04%	3,825	11,515	33.22%
Asian or Pacific Islander, Non-Hispanic	205	909	22.55%	910	4,443	20.48%
Native American, Non-Hispanic	10	177	5.65%	18	246	7.32%
Other, Non-Hispanic	134	372	36.02%	694	2,133	32.54%
Total	6,115	33,550	18.23%	24,355	120,520	20.21%

Note: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

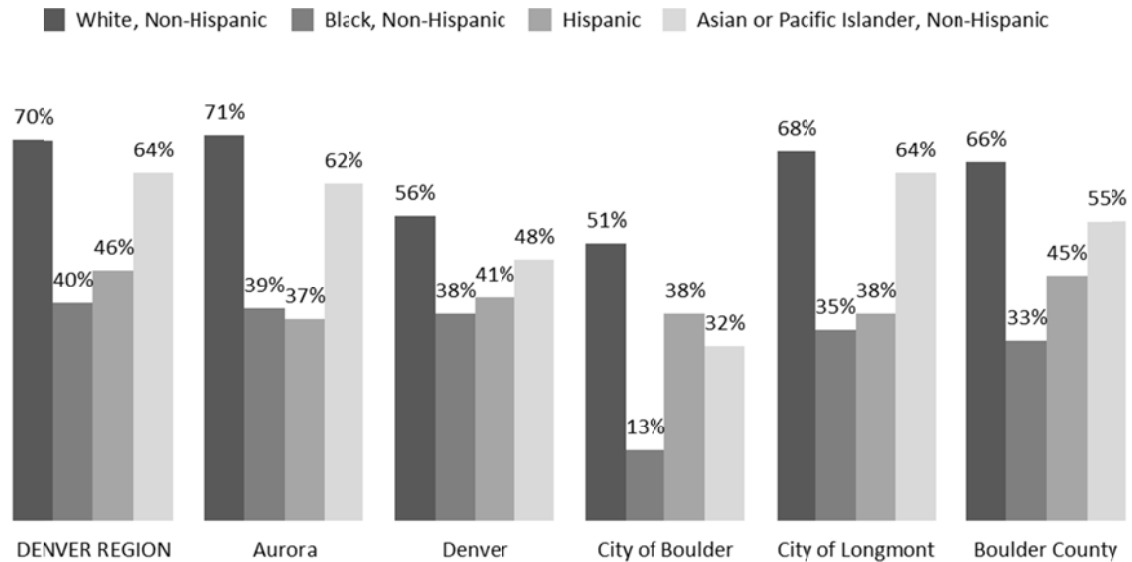
All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Source: CHAS.

Homeownership gaps. Figure III-5 shows how homeownership rates differ among the participating jurisdictions. Aurora very closely resembles the region overall, except for Hispanic residents, who have a lower homeownership rate in Aurora than in the region overall.

Longmont also resembles regional ownership rates. Denver has the smallest gap in ownership among races and ethnicities. The homeownership rate for African Americans in Boulder is extremely low. All jurisdictions could do much better to equalize ownership for African American and Hispanic households.

Figure III-5.
Differences in Homeownership, by Race and Ethnicity, 2016



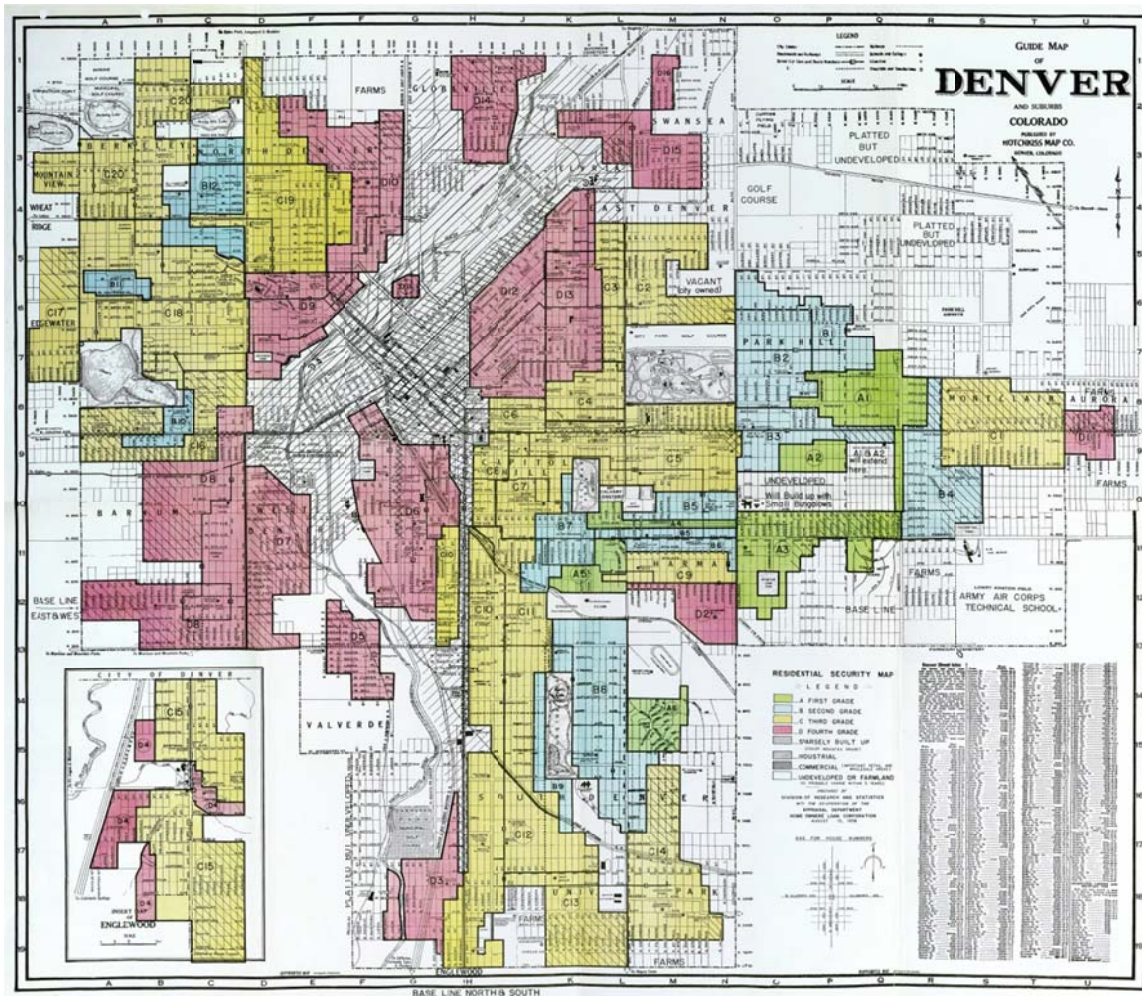
Source: HUD AFFH Data and Mapping Tool, version 4.

Residential capital constraints. Residential settlement patterns in Denver, like most major cities in the U.S., were heavily influenced by federal policies to segregate residents based on their race, ethnicity, color, familial status, and disability. These policies, along with discrimination in employment and segregation in education, worked together to regulate where people lived, which in part determined their potential for economic growth.

For example, in the mid-1930s, the federal Home Owners’ Loan Corporation (HOLC) developed maps (with the assistance of lenders, appraisers, and developers) that color coded communities based on their “desirability” rating. Those maps steered mortgage lending to certain neighborhoods based on where residents of color lived—or were expected to live. Fair housing and lending protections would not be enacted for more than 30 years after the HOLC was formed. As such, for decades, housing and lending discrimination was reinforced.

The map below shows the neighborhood rating developed for Denver. Blue neighborhoods have the highest desirability, followed by green. Yellow are “definitely declining” and red are “hazardous.” Red-coded neighborhoods are those near rail lines, factories, and away from parks. These were the only areas where residents of color were allowed to live—and have grown to become some of Denver’s strongest communities. They are now areas where residents are at risk of displacement due to increasing housing costs.

Figure III-6.
Residential Security Map, 1938, Denver



Source: Denver Public Library Western History and Genealogy Department, National Archives and Records Administration (NARA).

Today, access to residential capital investment is monitored through Home Mortgage Disclosure Act (HMDA) data. HMDA data contain mortgage loan application records with information on the race, ethnicity, gender and income of the applicant, as well as loan terms (e.g., subprime loans). The data are widely used to detect evidence of discrimination in mortgage lending, although analysis of the publicly available data is limited by lack of applicant credit information.

Subprime lending. In 2007, as awareness of the impacts of subprime lending was growing, the Colorado Civil Rights Division conducted a study that examined differences in loan denials and interest rates by race and ethnicity for every county in the state.

The study found that:

- Across the Front Range, counties whose minority population was above the state average had the highest proportions of subprime loans. Areas with relatively high proportions of LEP households also had high subprime loan activity.

- African Americans and persons of Hispanic descent in Colorado were twice as likely to get subprime loans than Whites or Asians:
 - One in 5 white borrowers got a subprime loan.
 - One in 2.3 African American borrowers got a subprime loan.
 - One in 2.23 Hispanic borrowers got a subprime loan.
 - One in 3.5 multi-race borrowers got a subprime loan.
- This activity is not explained by income alone: High-income borrowers represent a significant segment of the subprime market. Borrowers earning more than \$100,000 represented about 22 percent of the subprime market compared to 31 percent of the non-subprime market.
- Differences in subprime lending by race and ethnicity exist even for high income borrowers: 17 percent of White borrowers earning \$100,000 and more received subprime loans in 2006, compared to 39 percent of African Americans and 34 percent of Hispanics at the same income level.
- There was no one dominant lender or group of lenders making subprime loans. The top lenders originated just between and 1 and 3 percent of the total subprime volume in the state.

Figure III-7 shows disparities in subprime lending by county, including the Denver MSA, Boulder, and the broader Front Range. Disparities in the proportion of subprime loans for African American and Hispanic borrowers (far right columns) are most pronounced in Denver, Jefferson County, and Boulder County (African Americans) and Denver and Boulder County (Hispanic borrowers).

Figure III-7.
Loans by County, Race, and Subprime Status, Front Range Counties, 2006

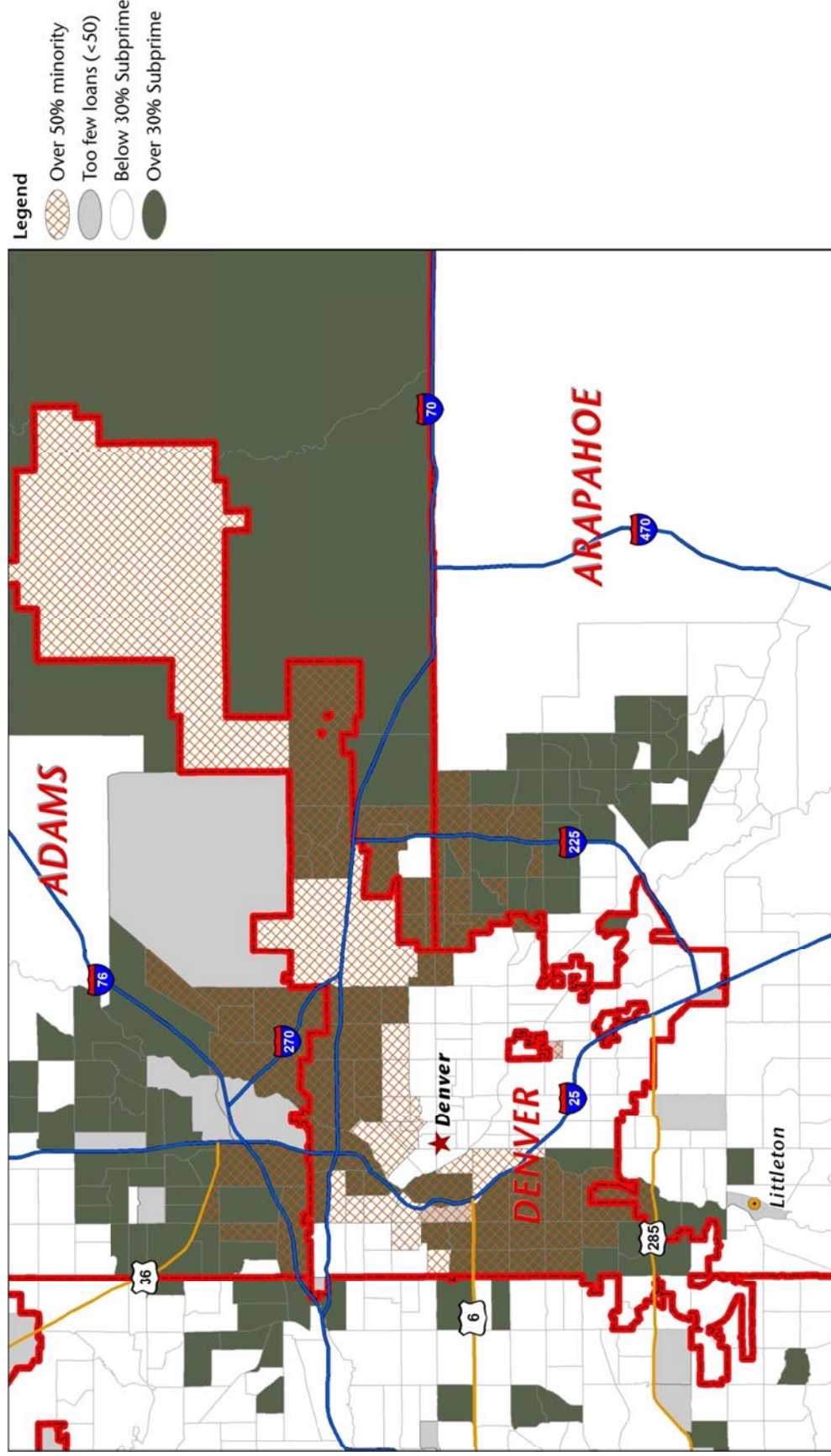
County	White Borrowers			Black Borrowers			Hispanic Borrowers			Black-White	Hispanic-White
	Total	Subprime	%	Total	Subprime	%	Total	Subprime	%	Disparity	Disparity
Denver	16,481	2,935	18%	1,761	803	46%	5,052	2,467	49%	2.56	2.74
Adams	12,897	3,501	27%	386	183	47%	4,492	2,094	47%	1.75	1.72
Arapahoe	18,682	4,147	22%	1,924	897	47%	2,691	1,241	46%	2.10	2.08
Broomfield	2,470	351	14%	30	10	*	155	37	24%	*	1.68
Douglas	16,789	2,792	17%	240	83	35%	831	246	30%	2.08	1.78
Jefferson	19,954	3,691	18%	178	83	47%	1,766	662	37%	2.52	2.03
Denver MSA	87,273	17,417	20%	4,519	2,059	46%	14,987	6,747	45%	2.28	2.26
Boulder	9,070	993	11%	61	19	31%	613	237	39%	2.84	3.53
El Paso	23,013	4,843	21%	1,312	484	37%	2,313	825	36%	1.75	1.69
Larimer	11,067	1,949	18%	64	16	25%	512	147	29%	1.42	1.63
Mesa	6,873	1,623	24%	24	11	*	484	155	32%	*	1.36
Pueblo	4,202	1,298	31%	87	42	48%	1,812	784	43%	1.56	1.40
Weld	9,572	2,200	23%	68	28	41%	1,653	709	43%	1.79	1.87
Colorado	175,752	35,337	20%	6,249	2,692	43%	24,390	10,379	43%	2.14	2.12

Note: Too few loans (less than 60)

Source: 2006 HMDA, Federal Financial Institutions Examination Council and BBC Research & Consulting

Figure III-8 on the following page shows the geographic relationship between subprime lending and majority minority neighborhoods in Denver and Arapahoe Counties. Subprime lending was active not only in minority neighborhoods, but also in areas with active homebuilding.

Figure III-8. Census Tracts with Populations over 50 Percent Minority Overlaid on Subprime Concentration, 2006



Source: 2006 HMDA, Federal Financial Institutions Examination Council and BBC Research & Consulting.

Consequences of subprime lending. Subprime lending activity had a disproportionate impact on minority residents in two primary ways:

- Minority borrowers were disproportionately targeted with high-interest, high risk loans (as evidenced above), many of which exceeded home values. Thus, borrowers were immediately “underwater” and very vulnerable to market declines; and
- Many of these borrowers lived in neighborhoods where concentrated subprime and risky lending was located. As such, when the loans became difficult for borrowers to service (because of adjustable interest rates, balloon payments, lost jobs), the entire neighborhood was affected. This led to foreclosures, vacant properties, private disinvestment, and displacement of residents in targeted neighborhoods.

Today, the neighborhoods with high proportions of subprime loans are where renters are being displaced once again. Investors who purchased foreclosed homes during the market downturn and have been renting those units—sometimes to residents who lost their homes in the economic downturn—are now selling those homes. Among those who experienced displacement, one in five (19%) identified the landlord selling the home as a reason for their displacement. This varied geographically and by survey respondent characteristics. Of those who experienced displacement, landlords selling the home impacted:

- Three in 10 (30%) displaced residents currently living in Aurora (note the displacement did not necessarily occur in Aurora);
- Three in 10 (29%) displaced Asian residents;
- One in four (25%) displaced African American residents;
- One in four (25%) displaced residents with Section 8 vouchers; and
- More than one in five (23%) displaced households with children under age 18.

Higher income households were more likely than the lowest income households to be displaced due to a landlord selling the home. For example, three in 10 (31%) displaced residents with household incomes of \$100,000 or more were displaced due to a landlord selling compared to 13 percent of households with incomes less than \$25,000.

Current lending gaps. Since 2006, subprime lending has declined significantly. Subprime loans represented 24 percent of loans originated in Colorado in 2006. In 2016 (the latest date for HMDA data), subprime loans were:

- 2 percent of all loans in Denver;
- 3 percent in Adams County;
- 2.5 percent in Arapahoe County; and
- Less and 1 percent in Boulder County.

Current gaps in mortgage loan and home improvement approvals (as of 2016) are shown in the following figure. Overall, the gaps are much smaller than the subprime gaps shown in 2006. The most significant differences occur in:

- Loan originations are relatively very low for American Indian and Alaska Natives in Denver and Arapahoe Counties;
- All areas show gaps in originations among African American and White applicants and Hispanic and non-Hispanic applicants. These gaps are largest in Boulder and Denver Counties;
- In Boulder County, African Americans are much more likely than other races to withdraw their applications. This is also true of American Indian and Alaska Natives in Denver. This may suggest a lending environment that is not perceived as welcoming; and
- There are differences in the proportions of files being closed for incompleteness, suggesting that some borrowers could benefit from homeownership counseling.

Figure III-9.
Action on Mortgage Loan Applications, All Loan Types, by Race and Ethnicity, 2016

	Application Approved but Not Accepted	Application Denied by Financial Institution	Application Withdrawn by Applicant	File Closed for Incompleteness	Loan Originated
Arapahoe County					
American Indian or Alaska Native	3%	22%	14%	7%	48%
Asian	2%	15%	14%	5%	58%
Black or African American	2%	20%	15%	6%	52%
Native Hawaiian or Other Pacific Islander	4%	21%	14%	6%	50%
White	2%	12%	13%	4%	61%
Hispanic descent	2%	18%	14%	5%	55%
Non-Hispanic descent	2%	13%	13%	4%	60%
<i>African American White difference</i>	0%	8%	2%	2%	-9%
<i>Hispanic non-Hispanic difference</i>	0%	5%	1%	1%	-5%
Boulder County					
American Indian or Alaska Native	4%	23%	14%	1%	54%
Asian	2%	8%	14%	3%	69%
Black or African American	3%	15%	21%	3%	55%
Native Hawaiian or Other Pacific Islander	2%	16%	18%	6%	56%
White	2%	10%	14%	4%	66%
Hispanic descent	1%	19%	16%	6%	55%
Non-Hispanic descent	2%	10%	14%	4%	67%
<i>African American White difference</i>	1%	4%	7%	0%	-11%
<i>Hispanic non-Hispanic difference</i>	-1%	9%	2%	2%	-12%
City and County of Broomfield					
American Indian or Alaska Native					
Asian	4%	10%	10%	4%	62%
Black or African American					
Native Hawaiian or Other Pacific Islander					
White		11%	13%	4%	63%
Hispanic descent	2%	17%	12%	7%	56%
Non-Hispanic descent	3%	11%	13%	4%	63%
<i>African American White difference</i>					
<i>Hispanic non-Hispanic difference</i>	-1%	6%	-1%	3%	-7%
City and County of Denver					
American Indian or Alaska Native	2%	25%	17%	8%	44%
Asian	3%	14%	12%	4%	61%
Black or African American	2%	22%	14%	6%	51%
Native Hawaiian or Other Pacific Islander	1%	15%	13%	5%	57%
White	2%	11%	13%	4%	62%
Hispanic descent	2%	20%	14%	6%	52%
Non-Hispanic descent	2%	11%	13%	4%	62%
<i>African American White difference</i>	0%	11%	1%	2%	-11%
<i>Hispanic non-Hispanic difference</i>	0%	9%	2%	2%	-10%

Note: Blank cells indicate that data are not available.

Source: 2016 HMDA and BBC Research & Consulting.

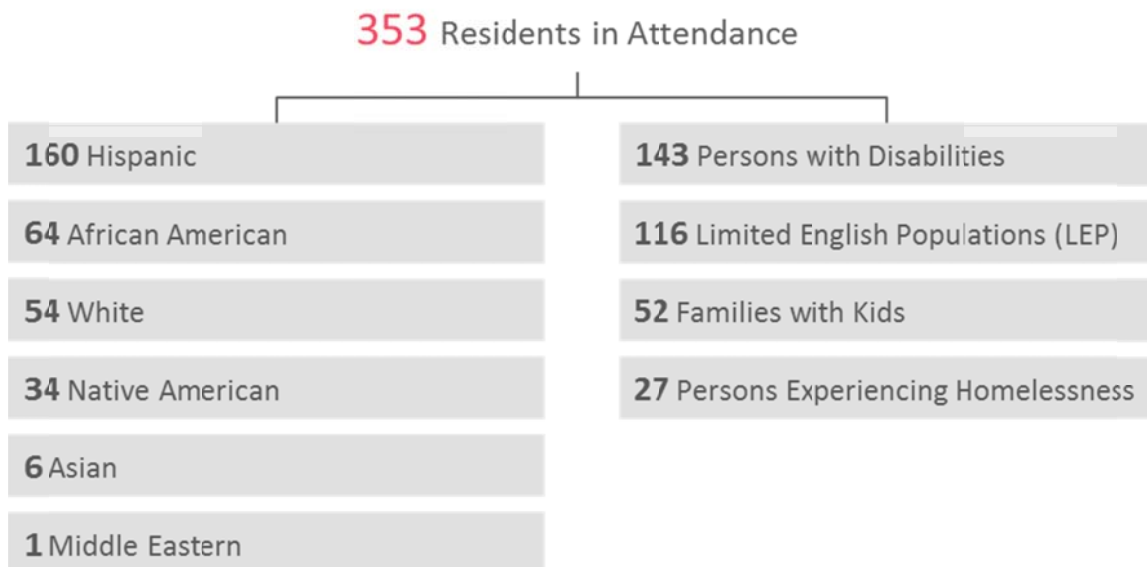
Differences in Housing Needs Reported by Residents

This section uses survey data and focus group findings to demonstrate where housing needs differ by resident group. It begins with findings from the focus groups, continues to findings from the resident survey, and concludes with findings from similar efforts conducted by other organizations.

Housing needs from focus groups. Focus groups were conducted with low to moderate income residents in the region.

As shown in the figure below, more than 350 residents attended focus groups. These residents represented a wide range of racial, ethnic, and household groups—with over-representation of residents who are historically proportionately less likely to be involved in planning processes.

Figure III-10.
Resident Groups Represented in Resident Focus Groups



Source: BBC Research & Consulting.

Low income renters. Renters in most parts of the region feel very housing insecure. Many live in precarious situations and worry about being evicted. They love their neighborhoods, are happy with the public schools, are committed to their churches, and worry that they will need to leave because of rising rents. Housing insecurity of this magnitude is new. Although some areas of the region have always been pricey (e.g., Boulder), low income residents could find affordable rentals in many other parts until recently. Residents attribute this change to growth, public investment, and formerly undesirable areas (light industrial areas, neighborhoods near major traffic/bus corridors) becoming hip places to live.

“Montbello is my home. I want to stay here. I just wish my rent were not so high.”

Low income renters in Aurora interviewed for this study lived in publicly subsidized housing and, as such, were less worried about displacement than safety. Many lived in neighborhoods

where they felt unsafe and didn't have confidence that the police would respond to their concerns. They describe apartment complexes with gang activity and fear that if they report the activity they will be harmed.

Families. Affordable rental housing for families is particularly hard to find in the current rental market. Many families rent homes acquired by investors during the market downturn that are now being sold by the owners. These families are being evicted and displaced from their neighborhoods.

Some feel that new development is being built to move them out of their neighborhoods and were not proper places for children to live:

"The new developments that are being built, they are not for us. They are for people moving into the city from the suburbs or from out of state."

"We don't want more housing if it is small apartments. We want our children to be outside playing, to be creative, to enjoy nature."

Several renter families lost their homes during the housing market crises. A young man shared his story as a teenager (he is now a young adult) in a focus group. His family's home was foreclosed upon; it was their grandmother's home and she accumulated medical bills, which required the house be sold. The family jumped from motel to motel on East Colfax in Aurora to stay in Aurora Public Schools because his high school was his support system. Their situation was very unsafe. He was embarrassed to come to school; it took a toll on his confidence.

"I remember thinking: 'This can't be my life. I am just a kid.'"

Two teenagers attending DSST Cole High School had to move from the neighborhood, now live in Commerce City and Aurora, and drive 35-45 minutes to school each way.

Many families were very frustrated about how expensive their neighborhoods had become. Some had left for college and returned to find they could not afford to buy in their neighborhoods. One family is made up of two workers, both work full time. They want to buy but cannot pay more than \$300,000 for a home. Another said:

"I have good credit and can afford a home up to \$500,000. I'd like a normal family house, in Central Denver, where I was raised and am part of the community. The homes are priced for the land, to be scraped. They are an investor product, not a home."

Undocumented immigrants. It is common for undocumented residents and/or residents who do not speak English to operate under informal rental arrangements, which can lead to problems and potentially discriminatory treatment. Many residents described landlords who demanded they pay rent in cash and then claimed, mid-month, that the rent hadn't been paid. Landlords asking for supplemental payments in cash of undocumented and/or Spanish speaking residents were mentioned by a handful of residents in focus groups.

The ability of these residents to become a homeowner is limited by lack of access to capital. Some residents use borrowed social security numbers to access rental housing or pay cash and, as such, do not develop a credit history.

LGBTQ residents. LGBTQ teens discussed both housing and community needs in the focus group they attended. The primary theme was safety: Most of their concerns were about safety school, safety on the bus, and safety in their broader community. Some were homeless and others lived in neighborhoods off of East Colfax in Denver. One teen lived in Jefferson County. One teen had been homeless and said their only option was “to go live with my dad,” which was not ideal. Very few felt safe in their neighborhoods. Many said their parents struggled with housing costs.

In 2016 One Colorado issued an LGBTQ Needs Assessment prepared by Simon Analytics. Among LGBTQ respondents living in the Denver Metro Area:

- Amplifying the concerns of youth focus group participants, nearly three in four adult survey respondents (73%) have been a victim of verbal abuse and 20 percent have experienced physical violence as a result of their sexual orientation or gender identity. More than half (55%) experienced harassment or bullying in middle school or high school due to sexual orientation or gender identity;
- One in three (32%) has been discriminated against in employment (e.g., denied a job, not promoted, fired) due to sexual orientation or gender identity. This rate is even higher for Native American LGBTQ residents statewide (42%); and
- More than one in 20 (6%) LGBTQ residents living in the Denver Metro area believe they have been denied housing due to their sexual orientation or gender identity. Statewide, 15 percent of Native American LGBTQ residents and 12 percent of African American LGBTQ residents have been denied housing due to their sexual orientation or gender identity.

Eviction and displacement experience. “Facing Eviction Alone” was recently released by the Colorado Center on Law and Policy and is based on a review of nearly 100,000 eviction filings from 2001 through 2016. Of these, 80 percent resulted in renters moving from their apartments. The report found significant advantages for renters who had legal representation after an eviction notification: When a renter had a lawyer, they usually won their case. When they didn’t, they were evicted 68 percent of the time in private housing cases and 43 percent of the time from public housing. The report suggests that access to affordable legal representation could be a solution for displacement. It is important to note that lack of access affects moderate income renters, as well as low income renters, because they do not qualify for legal services.

Although legal help is key in avoiding displacement, most residents do not seek out legal help or assistance, according to the focus groups. Residents do not have enough time to seek legal assistance when they are given seven days to move from a unit. They may feel their rights have been violated but do not have any time to act.

“They ask you for 60 days before you can move in...but it only takes 7 days for them to move you out.”

“A hotline doesn’t help if I have to be out of the apartment in 7 days.”

Residents’ solution is to call the police. Many residents who participated in focus groups said they called the police when they were facing eviction and the police were helpful in resolving their situation (especially the Denver Police Department), especially when the landlord was hostile to them. Others were afraid to call them because of their undocumented status/race/ethnicity.

“Tomorrow for us...is never for sure.”

Solutions are less effective. For many years, neighborhoods that received little attention solved their own problems, by pooling resources to assist residents in need. These informal networks functioned like emergency rental assistance or in some cases, land trusts. In Denver’s Globeville/Elyria/Swansea (GES) neighborhood, residents pooled resources to help community members buy homes.

Price increases have limited these residents’ ability to address needs in this way, just as they have made public resources less effective.

Residents in the Westwood neighborhood are hoping to create formal community capital, or “loan circles,” to help support their network of families when they are experiencing evictions; manage increased rents or property taxes; need repairs to major appliances; and/or want to acquire a home.

“We need housing for all people, for people who have been living in the communities for many years.”

“The people who are working to improve low income communities are the same people who are being displaced and evicted. And it’s not fair. [Denver] is changing and it is hurting the people who have invested the most in the city, who made the city what it is today.”

Displacement and eviction—resident survey respondents. The survey conducted for this study provides some information on how residents have been affected by displacement. To better understand the extent of displacement in the region, resident survey respondents answered a series of questions related to displacement, beginning with the question, “In the past five years, have you had to move out of a home or apartment in the Denver Metro Area when you did not want to move?” Overall, one in five (19%) survey respondents report experiencing displacement for any reason in the past five years. One in three current renters (30%) and 43 percent of residents who are currently precariously housed¹ who responded to the resident survey experienced displacement in the past five years in the region. Two in five (42%) renters currently living in Aurora and nearly half of current renters in Broomfield (48%) who

¹ For the purposes of survey analysis, respondents are considered “precariously housed” if they are staying with friends or family but are not on the lease or property title; staying in a shelter or transitional housing; staying in a motel/hotel or other temporary housing situation; or are without shelter, experiencing homelessness.

participated in the survey experienced displacement in the past five years, the highest rates among regional renters.²

Experience with displacement also varied by respondent demographic and socioeconomic characteristics. Those with higher displacement rates than the regional rate (19%) include:

- Nearly two in five (37%) Section 8 voucher holders;
- Nearly three in 10 (29%) households that include a member with a disability;
- Households with incomes less than \$25,000 (28%);
- African American (27%), Native American (27%) and Hispanic (26%) residents;
- More than one in four (27%) large families; and
- More than one in four (26%) households with household incomes of \$25,000 up to \$50,000.

Figure III-11 presents the share of a population who experienced displacement and the proportion of those populations impacted by: rent increased more than could be paid; evicted for being behind on the rent; and landlord selling the home.

The greatest proportion of renters with displacement experience (41%) had to move because “rent increased more than I could pay.” As discussed previously, “landlord selling the home” was a factor for 20 percent of renters who experienced displacement. Eviction was a factor for one in 20 (5%) current renters and 17 percent of the precariously housed. Regionally, “personal reasons” such changes in household composition resulting from changes in personal relationships are factors in 16 percent of displacements. Reasons for displacement vary by respondent demographic and socioeconomic characteristics.

- Households most likely to be displaced due to the rent increasing more than could be paid are households with incomes ranging from \$25,000 up to \$50,000 (50%) and large families (48%).
- Households most likely to be displaced due to being evicted for being behind on the rent are large families (15%), Native American residents (13%) and households with incomes less than \$25,000 (13%).
- Households most likely to be displaced due to the landlord selling the home are households with incomes greater than \$100,000 (31%), Asian residents (29%), African American residents (25%) and households with Section 8 vouchers (25%).

² It is important to note that the displacement experience did not necessarily occur in the respondent’s current community of residence.

Figure III-11.
Displacement Experience and Reasons for Displacement by Selected Protected Class
Characteristics and Household Income

	Percent Displaced	Reason for Displacement		
		Rent Increased More than I Could Pay	Evicted: Behind on Rent	Landlord Selling Home
Race/ethnicity				
African American	27%	41%	7%	25%
Asian	14%	36%	7%	29%
Hispanic	26%	38%	8%	20%
Native American	27%	37%	13%	15%
Non-Hispanic White	17%	42%	5%	20%
LEP				
LEP	16%	42%	11%	0%
Children under 18				
Children under 18	21%	42%	9%	23%
Large family				
Large family	27%	48%	15%	20%
Disability				
Disability	29%	37%	10%	13%
Section 8				
Section 8	37%	28%	7%	25%
Household Income				
Less than \$25,000	28%	33%	13%	13%
\$25,000 up to \$50,000	26%	50%	4%	20%
\$50,000 up to \$100,000	19%	43%	3%	22%
\$100,000 or more	8%	35%	1%	31%

Note: Displacement did not necessarily occur within current community of residence.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

9 to 5 resident survey. 9 to 5 Colorado released a report in September 2016 about how light rail has affected communities—primarily renters, people of color, and low income households—in West and Southwest Denver. The report was based on a survey of 961 residents (100 in Spanish) throughout 2015 and grew into an effort to advocate for rent stabilization policies. Primary findings include:

- 86 percent of residents said they faced barriers to finding a rental unit in the past 3 years. The largest barrier was cost (87%), followed by deposit amount (66%), and application fees (54%). Results from the survey conducted for the AI are similar to those found by 9 to 5 Colorado. Among AI survey respondents with similar demographic characteristics as the 9 to 5 respondents, the top three reasons why those who want to move have not yet moved are: they cannot afford to live anywhere else; they cannot pay moving expenses/deposits; and they can't find a better place to live.
- The majority of respondents said rent increases had been a challenge for them to remain in their homes (69%). In addition to those who experienced displacement due to rent increases, even higher proportions of Hispanic, Asian, Native American, large family and LEP renters who participated in the AI resident survey worry about their rent going up more than they can afford.

- 20 percent of residents said background checks were a barrier in finding housing. Racial and ethnic disparities in criminal arrests—and the chance of getting a ticket for camping while homeless—exacerbate the impact of criminal background checks for persons of color. The inconsistency in how property managers deal with criminal records is confusing, unpredictable, and costly to rental applicants. Among respondents to the AI resident survey, those who were denied housing to rent or buy were more likely to cite income too low and bad credit than criminal history as a barrier to renting. Criminal history was among the top five reasons why residents with disabilities had been denied housing to rent or buy.
- Nearly 40 percent of residents had been forced to leave a rental property in the past 3 years.

Persons with disabilities. Segregation remains an important issue for people with disabilities, including physical, developmental, and other disabilities. The Supreme Court’s Olmsted decision, and the substantial legal and policy efforts consistent with it, has begun to address the unnecessary and illegal segregation of people with disabilities.³ Regulatory barriers on group living arrangements, transit access, housing accessibility and visitability, and proximity to health services, are just some of the opportunity related issues that people with disabilities face.

Seniors are much more likely to have a disability than non-seniors—33 percent of residents 65 and older have a disability compared to 6 percent of residents under the age of 65. As such, communities with an aging population are likely to see substantial increases in the number of residents with disabilities. If the prevalence of disability remains constant by age, the region will have 237,000 more individuals with disabilities by 2040.

Availability of accessible housing. In typical housing markets, persons with disabilities have difficulty finding housing that accommodates their needs. High cost, low vacancy housing markets present even greater challenges. Indeed, a January 2018 search on ColoradoHousingSearch.com, part of Socialserve.com, found zero units for rent in Denver between \$0 and \$1,500 with limited accessibility features and which were not senior only housing.

Among survey respondents whose household includes a member with a disability, one in 10 (13%) cannot afford housing that has the accessibility features needed. This challenge is highest for Boulder and Longmont households that include a member with a disability (18%).

Building privately-provided rental units is rarely a solution for people with disabilities who need housing. Although multifamily developments built after 1991 are required to comply with accessibility provisions (see text box below), their units are not required to be affordable.⁴ Furthermore, the Fair Housing Act’s design and construction requirements do not cover

³ Olmstead v L.C. is a 1999 Supreme Court case related to discrimination against people with mental disabilities. The decision acknowledged that mental illness is a form of disability under the Americans with Disabilities Act (ADA) and that institutional isolation is a form of discrimination under Title II of the ADA. Implications of the decision include efforts to integrate individuals with mental disabilities into the community at large, rather than living in institutions.

⁴ The exception is federally funded housing, which does require a certain proportion of accessible units in mixed-income and affordable developments.

multistory townhomes—even units that have two, three, or four stories—unless the building has an elevator. This is unfortunate and inconsistent with both the spirit of the Olmstead Act and market realities: smaller multi-unit settings, including attached home communities, provide some of the best non-institutionalized, communal, and affordable settings and are natural places for persons with disabilities to live.

The Fair Housing Act requires seven basic requirements that must be met to comply with the access requirements of the Act. Those requirements are:

Requirement 1. An accessible building entrance on an accessible route.

Requirement 2. Accessible common and public use areas.

Requirement 3. Usable doors (usable by a person in a wheelchair).

Requirement 4. Accessible route into and through the dwelling unit.

Requirement 5. Light switches, electrical outlets, thermostats and other environmental controls in accessible locations.

Requirement 6. Reinforced walls in bathrooms for later installation of grab bars.

Requirement 7. Usable kitchens and bathrooms.

Source: http://www.fairhousingfirst.org/faq/view_all.html

Lack of resources to find housing. Limited information to find accessible and affordable units, especially in alternative formats and understandable disproportionately affects persons with disabilities. Many focus group attendees said when they thought they were going to lose their homes they Googled “Low income housing” or “Low income permits” in hopes that this would yield information for them. They didn’t know where else to look.

People with cognitive disabilities may have trouble processing very long applications; one attendee said her application for housing with supportive services was 35 pages long.

3x rent rule. A landlord’s requirement that renter income be 3 times (3x) the rent has a disparate effect on a person with a disability because their ability to work is limited and they are largely dependent on Social Security and Disability Income (SSDI). This is an increasingly common requirement imposed on rental applicants by property owners and landlords.

For many residents with disabilities, SSDI is their primary income. These payments average \$1,200 per month. These individuals said “affordable” rent for them was between \$350 and \$450 per month. One focus group attendee was denied an apartment that rented for \$1,050 because of the 3x rule.

Persons with disabilities are much more likely than persons without disabilities to be living under the poverty line and, as such, receive Medicaid for health care. For example, in Aurora, the poverty rate for 35-64 year olds with a disability is 22 percent, compared to 7 percent for 35-64

year olds without a disability (Denver is 37% v. 9%; Boulder County is a much lower 9% v. 5%). These residents would need to become employed at least part time to afford the lowest end of market rent—yet doing so would cause them to lose Medicaid. Thus, their only option is to find publicly-subsidized housing (or finding a private landlord who does not apply a 3x rent rule), which is significantly oversubscribed in the current market. People with disabilities participating in focus groups for this study were on wait lists for more than five years before they found housing.

“Problem” tenant labeling. People with cognitive disabilities or mental illness may react more strongly to threats of eviction because they have been moved around and/or their housing options are significantly limited. Property managers don’t understand this and may be quick to identify and evict them as “problem” tenants. One focus group attendee said landlords have told her they are worried she will “burn down the apartment” because of her disability.

Experiences of residents with disabilities. The housing crisis puts persons with disabilities living in very challenging situations. Focus groups conducted with persons with disabilities found many to be living in severely compromised conditions due to housing shortages:

- An older woman lives in her aunt’s tough shed in her backyard. She has no electricity and is diabetic and is going blind. This woman had housing but was evicted for taking in her pregnant, homeless daughter. She sometimes finds refuge by riding the bus “but that costs a lot of money.”
- Another woman, with a cognitive disability, secured publicly assisted housing. When her son and daughter and her grandson became homeless, she took them in—and then was told she would be evicted if they stayed.
- A single mom who was a victim of domestic violence needs a secure facility where her harasser cannot locate her. She needs a specific location of affordable housing, far from the abuser—and cannot find resources to assist her.

“This transit oriented development (TOD) boom is pricing us out of what used to be affordable housing that worked for people with disabilities...because it was in undesirable locations.”

Families with disabilities are particularly vulnerable in the current market: Large bedrooms are especially difficult to find; 3 bedrooms rent for \$2,500 per month—nearly twice what SSDI+SSI pays.

“I had to ask my daughter and grandson to leave my apartment or else I would be evicted. They ended up homeless. It was the hardest thing I have ever done.”

Residents with disabilities living in housing that does not meet their needs. These issues—limited supply of accessible units, including ground floor units, compounded by housing costs, 3X rent income requirements, may explain why three in 10 (28%) households regionally that include a member with a disability of any type are living in housing that *does not meet* that member’s accessibility needs. The percentage of households living in housing that does not meet the accessibility needs of a member with a disability varies by jurisdiction:

- One in three (35%) in Aurora;
- One in three (33%) in Longmont;
- Three in 10 (30%) in Boulder;
- One in four (24%) in Denver)
- One in four (23%) in Boulder County; and
- One in 10 (13%) in Broomfield.

Types of improvements or modifications needed by these households include:

- Grab bars in bathroom or other locations (43%);
- Service or emotional support animal allowed in apartment/room (32%);
- Reserved accessible parking space (27%);
- Ramps (25%)
- Wider doorways/hallways (25%);
- Stair lifts (22%)
- Fire alarm/doorbell made accessible for person with hearing disability (16%);
- Alarm to notify if a non-verbal child leaves the home (7%).

Reasonable modification or accommodation requests. Among those to whom the question applied, one in five (22%) worry their rent will increase or they will be evicted if they request a reasonable accommodation for their disability. This is highest among Boulder households with a member with a disability (31%) and lowest in Boulder County (9%). Overall one in 10 households who requested a disability accommodation were denied; this is highest among Boulder households (21%) and lowest in Boulder County (4%) and Longmont (4%). Fewer than one in 10 (8%) had a landlord deny a reasonable modification request; again, this is highest in Boulder (14%). Regionally, one in 20 (5%) households that include a member with a disability had a landlord refuse to accept a service animal, compared to 17 percent in Boulder.

Housing Discrimination

Overall, nearly two-thirds of survey respondents seriously looked for housing in the region in the past five years. To understand their search experience, respondents answered several questions related to challenges they may have encountered in the process of renting or buying a home. These housing provider actions—unreturned phone or email inquiries; being told a unit was available by phone, but unavailable when the applicant arrived in person; loan denial or being charged higher interest rates; steering by real estate agents—may suggest housing discrimination. Residents’ experience with these housing provider actions did not vary by place of current residence, but they did vary by race or ethnicity, disability, family size and English proficiency. Compared to other residents:

- Native Americans and those with a disability are less likely to have their emails to landlords inquiring about units returned;

- African American, Native American and residents with disabilities are less likely to have their phone calls to landlords inquiring about units returned;
- African American, Native American, residents with disabilities, and those with household incomes less than \$25,000 were more likely to be told a unit was available by phone but unavailable when they arrived in person;
- African American residents and large families are more likely to have been denied a home loan, and Asian residents and large families are more likely to say they were charged a high interest rate for their home loan;
- LEP residents were more likely to have a real estate agent only show them homes in neighborhoods where most people were of their same race or ethnicity.

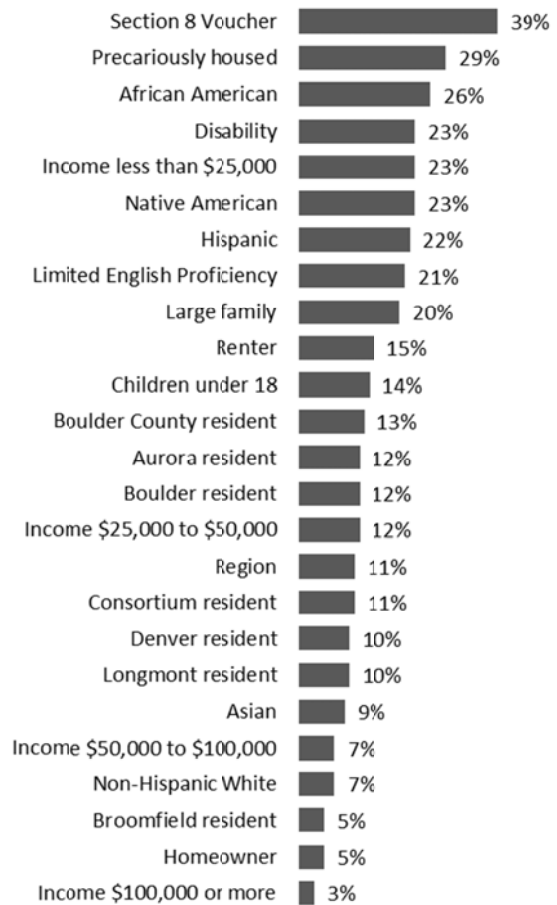
Survey respondents were asked, “When you looked for housing in the region, did you ever feel you were discriminated against?” Overall, 11 percent of survey respondents felt they were discriminated against when they looked for housing in the region. The proportion of residents who believe they experienced housing discrimination varies widely, from nearly two in five (39%) Section 8 voucher holders to 3 percent of respondents with household incomes of \$100,000 or more. About one in four African American residents, residents with disabilities, Native American residents and Hispanic residents felt they experienced housing discrimination.

Figure III-12.
When you looked for housing in the region, did you ever feel you were discriminated against?

Note: Experience with housing discrimination occurred in the region, but not necessarily in the place of current residence.

Source:

BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.



Overall, the top reasons residents believe they were discriminated against are:

- Race or ethnicity (22%);
- Income too low (15%);
- Section 8 (10%);
- Disability (8%);
- Familial status/having children (8%);
- Past evictions (5%); and
- LGBT (4%).

Discriminatory practices reported by focus group participants. Focus group participants were asked about their experience finding housing in the region. Some described cases where discriminatory behavior was encountered and not all were aware that the practices may be illegal.

- It is common for landlords renting to undocumented and/or Spanish speaking residents to charge additional fees per person on top of rent. This practice was mentioned frequently in the Spanish speaking focus groups and described as routine. Per-person charges have increased significantly, from \$25 per person a decade ago to \$60 to \$80 today. For a four-person household, these charges can add more than \$300 per month to an already high rent. In essence, a landlord implementing this practice could charge \$300 more for the same unit if children are present. Some landlords rationalize this practice based on the assumption that additional family members cause more wear and tear on a rental unit and higher utilities costs (if the landlord pays utilities).
- Single parents collecting child support have been denied rental units because the property manager was worried the support would be inconsistent. This action has a disproportionate impact on families with children.
- Residents without a SSN are reportedly charged more in rental security deposits. This may be related to lack of credit history (without a SSN it is difficult to demonstrate a consistent history of satisfying creditors).
- Renters living in homes make needed repairs because the landlords do not respond to requests. Sometimes it takes weeks before a drain is unclogged. They are buying broken appliances, too—stoves, fridges, faucets—to install in their rental units. These unauthorized repairs are sometimes used to evict them.
- Native American residents living in public housing are very concerned about federal no smoking policies and their effect on cultural traditions. They worry that if they smudge or cut sage/cedar or light candles or incense they will be accused of smoking in their apartments and may be evicted. One resident said an inspector came in shortly after he had smudged and said “Ha, almost caught you!”

- Some discrimination is still blatant:
 - One focus group attendee described a sign in front of a complex that said “Apartments for rent, 1, 2 and 3 bedrooms. He asked the neighbors if there were units for rent and they said yes. But the property managers say no. Or they walk right past and choose someone else in line.”
 - Other focus group attendee said she and her friends are often told “no children” when they have their kids with them.

Discrimination testing. In 2016, the Denver Metro Fair Housing Center (DMFHC) conducted an “audit” of the rental market in Broomfield, Denver, and Douglas counties to determine:

- The treatment of persons with disabilities in rental transactions, and
- Multifamily compliance with fair housing accessibility and design standards in construction.

The audit found that people without disabilities were treated more favorably in rental transactions than persons with disabilities. Twenty tests were conducted in a “matched pair” fashion. One tester was a person with a disability who asked the property manager or landlord about reasonable accommodations, including handicap accessible parking; service animals, ambulatory policies, ASL interpreters, and Braille leases. The other tester did not have a disability. These testers visited the same properties. The tests found:

- Persons without disabilities received more information about the property than persons with disabilities; this happened in nine of the 20 cases.
- There was never a time when the tester with a disability seeking housing got more information than their test counterpart.

The testing also found significant lack of compliance with design and construction standards: 80 percent of the 10 properties investigated for fair housing accessibility compliance were not accessible to persons with disabilities.

Publicly Supported Housing

Publicly supported housing plays a critical role in the provision of affordable housing, and this role expands in high cost housing markets. This includes provision of rental housing for lower income residents as well as ownership housing for moderate income residents created through public incentives or requirements (e.g., density bonuses, inclusionary zoning). For populations that face the added complication of discrimination and/or limited housing to meet their needs—accessible housing, larger units for families—publicly supported housing may be their *only* housing option.

This section examines how publicly supported housing helps alleviate the region’s shortage of housing. It primarily focuses on affordable rentals, where the need is the greatest. The section examines where public housing is located relatively to areas of opportunity; the types of households who live in public housing; and unit sizes and types.

It also reviews the key policies of the PHAs participating in this study:

- Resident preferences;
- Reasonable accommodations procedures;
- Criminal history “look back” periods; and
- Compliance with the Violence Against Women Act (VAWA).

As part of this study, AHA, BCHA, BHP, DHA, and LHA staff were interviewed about the Housing Authority’s policies and procedures, concentrations of residents and the locations of units and voucher holders, and accessibility compliance. This section reports the results of these discussions.

Following the framework in the Assessment of Fair Housing (AFH) template, which was active when this study began, this section examines:

- 1) How residents served by the PHAs compare with income-eligible residents in the region;
- 2) Why certain groups are over- or under-represented in publicly supported housing;
- 3) How publicly supported housing is dispersed geographically; and,
- 4) PHA policies governing resident preferences, reasonable accommodations, language access, criminal history policies, compliance with the Violence Against Women Act, and affirmative marketing.

Publicly Supported Housing Demographics

The following figures, III-13 to III-17, show the demographics of residents who occupy housing developments provided by the PHAs or through the HUD AFFH Data and Mapping Tool. These developments include public housing, the Low Income Housing Tax Credit (LIHTC), developments designated to accept Housing Choice Vouchers (Section 8), and other affordable multifamily developments.

**Figure III-13.
Demographics of Aurora Housing Authority Beneficiaries, 2018**

AHA Beneficiaries	Race						Ethnicity	
	% White	% Black	% Asian	% American Indian	% Pacific Islander	% MultiRacial	% Hispanic	% Non-Hispanic
Residents living in AHA properties	28%	45%	17%	1%	1%	8%	16%	84%
Voucher holders	N/A	N/A	N/A	N/A	N/A	N/A	9%	91%
Denver Region overall	81%	6%	4%	1%	0%	3%	22%	70%
Percent of Area Median Income (AMI)								
	30% AMI	40% AMI	50% AMI	60% AMI	Other Household Characteristics			
					% Disability	% Single Parent Household		
Residents living in AHA properties	3%	3%	17%	78%	11%	40%		
Voucher holders	80%	16%	4%	0%	35%	44%		
Denver Region overall	11%	N/A	9%	N/A	9%	N/A		

Note: Adjusted for beneficiaries for whom race or ethnicity is unknown. Proportions may not total 100% due to rounding.

Source: Aurora Housing Authority, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (<https://legis.hud.gov/affht/>), 2016 1-year American Community Survey, and BBC Research & Consulting.

Residents living in AHA properties are predominately low- to moderate-income, making 50 to 60 percent of the Area Median Income (AMI). In contrast, voucher holders in Aurora have lower incomes: 80 percent of residents with vouchers make 30 percent or less of the AMI.

Compared to the Region overall, residents living in AHA properties are disproportionately African American/Black (45%) and Asian (17%).

Thirty five percent of voucher holders live with a disability, compared to 11 percent in AHA properties and 9 percent in the Region overall. In typical markets, persons with disabilities have trouble finding accessible units outside of those provided by public housing entities. The ability of voucher holders to access the housing they need in Aurora is unusual and should be an area of continued focus in housing programming. It is important that the City continue to offer grants for home modifications, in owner and rental properties, to maintain accessible housing stock.

**Figure III-14.
Demographics of Boulder County Housing Authority Beneficiaries, 2018**

BCHA Beneficiaries	Race					Ethnicity			
	% White	% Black	% Asian	% American Indian	% Pacific Islander	% Multiracial	% Hispanic	% Non-Hispanic	
Residents living in BCHA properties	92%	3%	1%	1%	0%	3%	28%	72%	
Boulder County overall	90%	1%	5%	0%	0%	2%	13%	87%	
	Percent of Area Median Income (AMI)							Other Household Characteristics	
	30% AMI	40% AMI	50% AMI	60% AMI			% Disability	% Single Parent Household	
Residents living in BCHA properties	63%	17%	12%	6%			21%	27%	
Boulder County overall	16%	N/A	9%	N/A			8%	N/A	

Note: Adjusted for beneficiaries for whom race or ethnicity is unknown. Proportions may not total 100% due to rounding.

Source: Boulder County Housing Authority, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (<https://legis.hud.gov/affht/>), 2016 1-year American Community Survey, and BBC Research & Consulting.

Residents living in BCHA properties have predominately extremely low- to very low-income—63 percent make an income of 30 percent or less of AMI and 17 percent make an income of 40 percent to 31 percent of AMI.

The racial and ethnic make-up of BCHA residents is similar to Boulder County overall, but Hispanic residents are slightly overrepresented in BCHA properties.

Twenty one percent of residents in BCHA properties are living with a disability, compared to just 8 percent in Boulder County.

**Figure III-15.
Demographics of Boulder Housing Partners' Beneficiaries, 2018**

BHP Beneficiaries	Race					Ethnicity		
	% White	% Black	% Asian	% American Indian	% Pacific Islander	% Multiracial	% Hispanic	% Non-Hispanic
All BHP residents	90%	4%	0%	0%	0%	5%	35%	64%
Residents <i>without</i> project based vouchers living in BHP properties (non-elderly)	88%	1%	2%	0%	0%	7%	43%	57%
Residents <i>with</i> project based vouchers living in BHP properties (non-elderly)	89%	1%	2%	0%	0%	6%	64%	34%
Boulder County overall	90%	1%	5%	0%	0%	2%	13%	87%
	Percent of Area Median Income (AMI)					Other Household Characteristics		
	30% AMI	40% AMI	50% AMI	60% AMI		% Disability	% Single Parent Household	
All BHP residents	19%	9%	29%	42%		21%	18%	
Residents <i>without</i> project based vouchers living in BHP properties (non-elderly)	24%	12%	48%	16%		6%	10%	
Residents <i>with</i> project based vouchers living in BHP properties (non-elderly)	12%	10%	40%	37%		16%	46%	
Boulder County overall	16%	N/A	9%	N/A		8%	8%	

Note: Adjusted for beneficiaries for whom race or ethnicity is unknown. Proportions may not total 100% due to rounding.

Source: Boulder Housing Partners, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (<https://legis.hud.gov/affh/>), 2016 1-year American Community Survey, and BBC Research & Consulting.

Similar to BCHA, the race and ethnicity of BHP's residents are similar to that of Boulder County overall, with the exception of an overrepresentation of Hispanic residents, particularly in non-elderly households.

Residents living in BHP properties range from extremely low- to moderate-income, with slightly more residents making between 50 percent or more of AMI. When compared to Boulder County overall, BHP has a similar proportion of extremely low-income residents.

Although 21 percent of BHP residents live with a disability, these residents are mainly elderly. When examining the percent of non-elderly residents with a disability, the proportion is closer to the County overall.

Non-elderly residents living in BHP properties with project based vouchers are disproportionately single parent households when compared to the region—46 percent compared to just 8 percent in Boulder County.

Figure III-16. Demographics of Denver Housing Authority Beneficiaries, 2018

DHA Beneficiaries	Race				Ethnicity		
	% White	% Black	% Asian	% American Indian	% Pacific Islander	% Hispanic	% Non-Hispanic
Residents living in DHA properties	58%	35%	5%	1%	0%	43%	57%
Voucher holders	46%	51%	1%	2%	0%	34%	66%
Denver Region overall	81%	6%	4%	1%	0%	22%	78%
Percent of Area Median Income (AMI)							
	30% AMI			Other Household Characteristics			
	31-50% AMI	51-80% AMI	81-100% AMI	% Disability	% Single Parent Household		
Residents living in DHA properties	81%	13%	4%	1%	32%	12%	
Voucher holders	82%	14%	4%	0%	21%	17%	
Denver Region overall	11%	9%	16%	N/A	9%	N/A	

Note: Adjusted for beneficiaries for whom race or ethnicity is unknown. Proportions may not total 100% due to rounding.

Source: Denver Housing Authority, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (<https://legis.hud.gov/affh/>), 2016 1-year American Community Survey, and BBC Research & Consulting.

The majority of voucher holders and residents living in DHA properties are extremely low-income, with 81 to 82 percent making 30 percent or less of AMI. This compares to just 11 percent of residents that are extremely low-income in the region.

African American/Black and Hispanic residents are overrepresented in DHA properties and as voucher recipients. Fifty one percent of Denver voucher holders and 35 percent of DHA residents are African American/Black compared to 6 percent in the region overall. Thirty four percent of Denver voucher holders and 43 percent of DHA residents are Hispanic compared to 22 percent in the region.

Residents living with a disability are also overrepresented in DHA properties and as voucher holders compared to the Denver Region overall.

**Figure III-17.
Demographics of Longmont Housing Authority Beneficiaries, 2018**

LHA Beneficiaries	Percent of Area Median Income (AMI)				Ethnicity		Race			
	30% AMI	40% AMI	50% AMI	60% AMI	% Hispanic	% Non-Hispanic	% White	% Black	% Asian or Pacific Islander	% Disability
Residents living in LHA properties	10%	35%	50%	5%	22%	78%	N/A	N/A	N/A	10%
Voucher holders	N/A	N/A	N/A	N/A	46%	54%	95%	2%	1%	28%
Boulder County overall	16%	N/A	9%	N/A	13%	87%	90%	1%	5%	8%

Note: Adjusted for beneficiaries for whom race or ethnicity is unknown. Proportions may not total 100% due to rounding.

Source: Longmont Housing Authority, HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (<https://egis.hud.gov/affhr/>), 2016 1-year American Community Survey, and BBC Research & Consulting.

LHA properties have a good mix of income levels, with the majority of residents making between 31 and 59 percent of AMI. Extremely low-income residents are slightly underrepresented in LHA properties compared to Boulder County.

Compared to the Region overall, residents living in LHA properties and voucher holders are disproportionately Hispanic.

Twenty eight percent of voucher holders are living with a disability, which is a higher proportion than LHA residents and Boulder County.

Depending on the size of the PHA and jurisdiction, the total number of publicly supported housing units and the populations they serve can vary. Figure III-18 shows the total number of units for each PHA in the region and the types of developments serving different populations.

Publicly assisted units serving families and/or individuals are the most common, but some PHAs have a substantial amount of units that serve seniors and/or persons with disabilities. BHP and LHA each have a transitional housing development that serves people experiencing homelessness.

Figure III-18.
Types of Publicly Supporting Housing, 2017

	Family		Senior		Transitional/SRO		Total Units
	Developments	Units	Developments	Units	Developments	Units	
Aurora Housing Authority	7	469	3	213	0	0	682
Boulder County Housing Authority	48	464	8	169	0	0	633
Boulder Housing Partners	23	830	6	422	1	31	1,283
Denver Housing Authority	30	4,001	3	336	0	0	4,337
Longmont Housing Authority	1	28	5	282	1	81	391

Note: Totals may represent occupied units only.

Source: Aurora Housing Authority, Boulder County Housing Authority, Boulder Housing Partners, Denver Housing Authority, Longmont Housing Authority, and BBC Research & Consulting.

Each PHA serves a different mix of income levels based on development types and the demographics of the jurisdiction. Overall, the income groups served by the PHAs reflect the greatest needs in the respective communities.

The majority of AHA residents are low- to moderate-income compared to DHA residents, who are predominately extremely low-income. BHP and LHA have a broader mix of income levels, but still skew towards low- to moderate-income residents.

Publicly Supported Housing Location and Occupancy

The geographic dispersion of publicly supported housing is an important factor in examining fair housing choice and segregation by income and race/ethnicity.

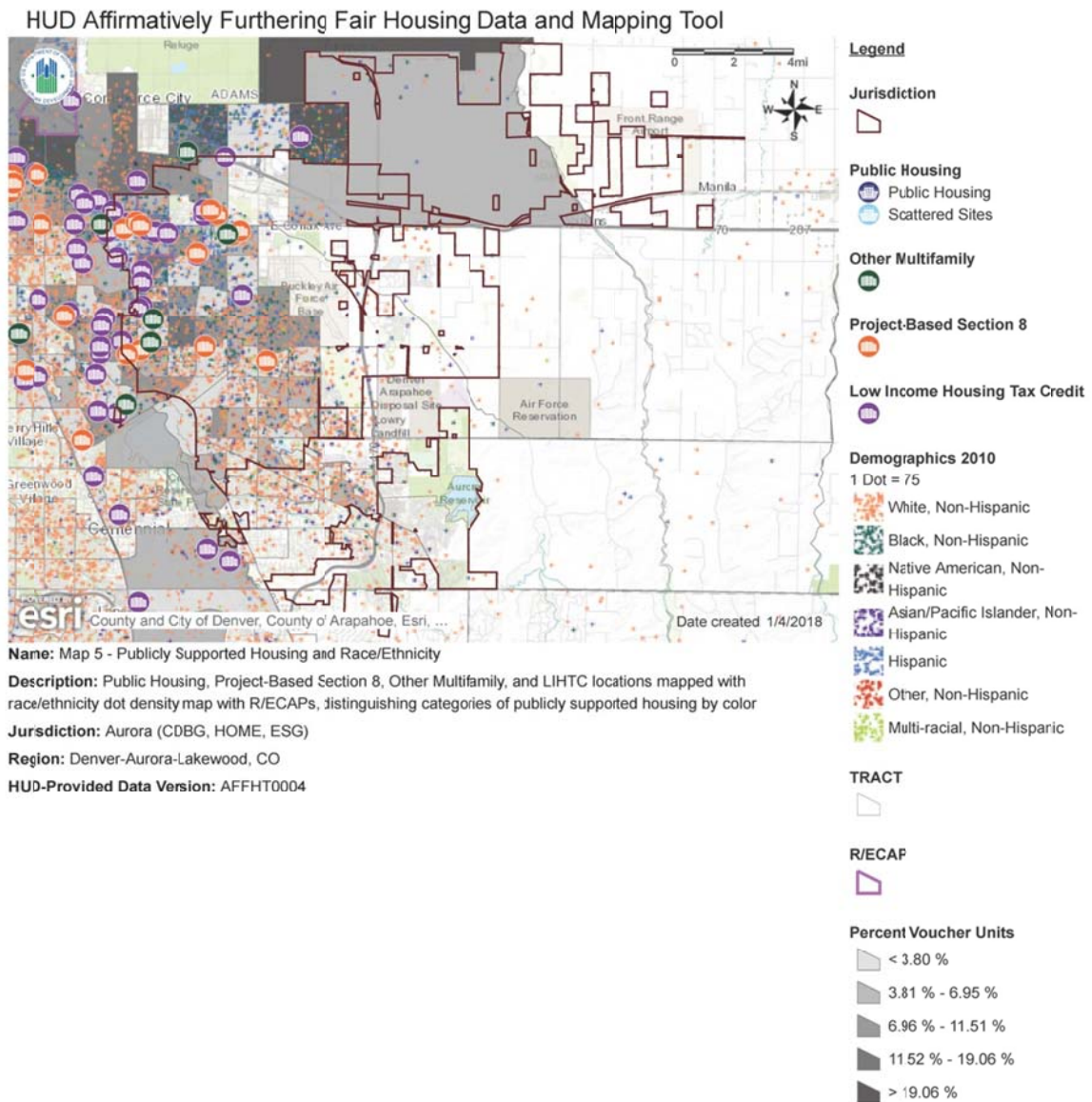
The HUD maps below show the location of publicly supported housing relative to where residents of different races and ethnicities live. The icons represent different types of publicly supported housing:

- Blue icons indicate housing that is owned and operated by a public housing authority—dark blue icons are public housing developments and light blue icons are scattered sites.
- Orange icons represent affordable rental housing that offers Housing Choice Voucher/Section 8 subsidies.
- Purple icons represent Low Income Housing Tax Credit (LIHTC) developments.

- Green icons show other types of publicly supported rental housing.
- Grey shading shows the percentage of rental units that house Housing Choice Voucher holders.

As seen in Figures III-19 and III-25, publicly supported housing is clustered in west and Northwest Aurora, along or near major corridors (i.e. Colfax Avenue, Havana, Yosemite), where services and transportation are more widely available. Voucher holders are also likely to live in this and the central part of Aurora.

Figure III-19.
Map 5 – Publicly Supported Housing, Aurora, 2010

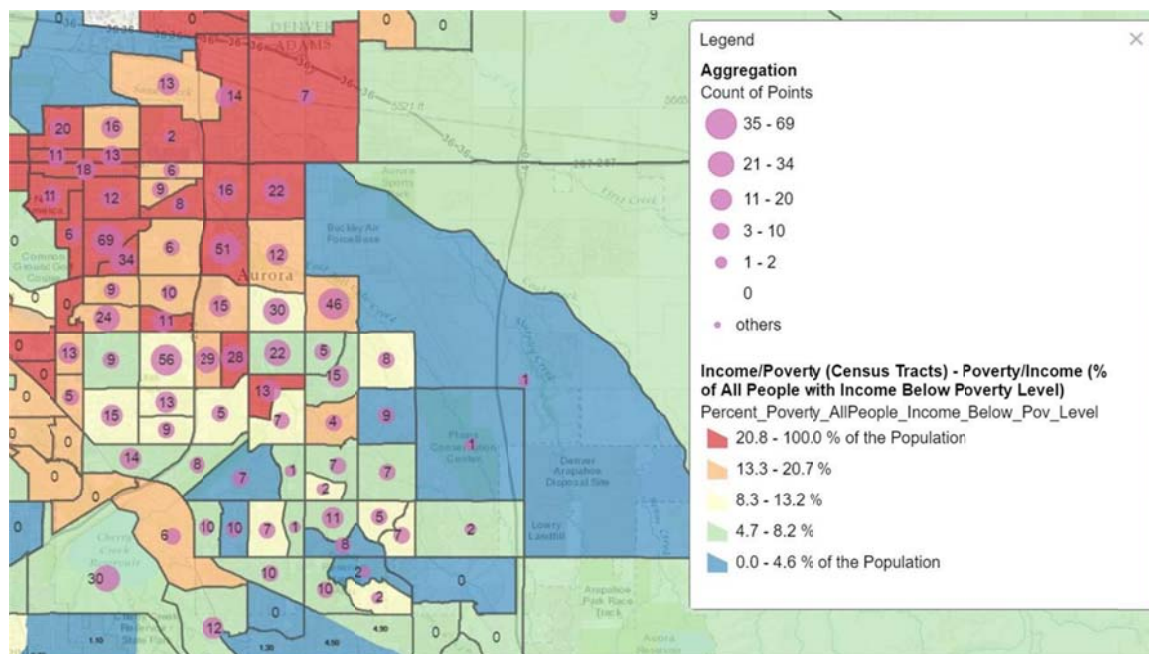


Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

Although housing choice vouchers are more evenly distributed throughout Aurora compared to public housing, LIHTC, and other types of publicly supported rental properties, vouchers are still somewhat concentrated in the northern neighborhoods of the city. Figure III-20 shows that the number of vouchers per census tract correlates with the percent of people living below the poverty line. While vouchers may provide households with more opportunity to low poverty neighborhoods, the options available for voucher holders tend to be in lower cost areas.

Overall, the far southeast neighborhoods in Aurora, which have a larger proportion of high income households, have very few publicly supported housing options.

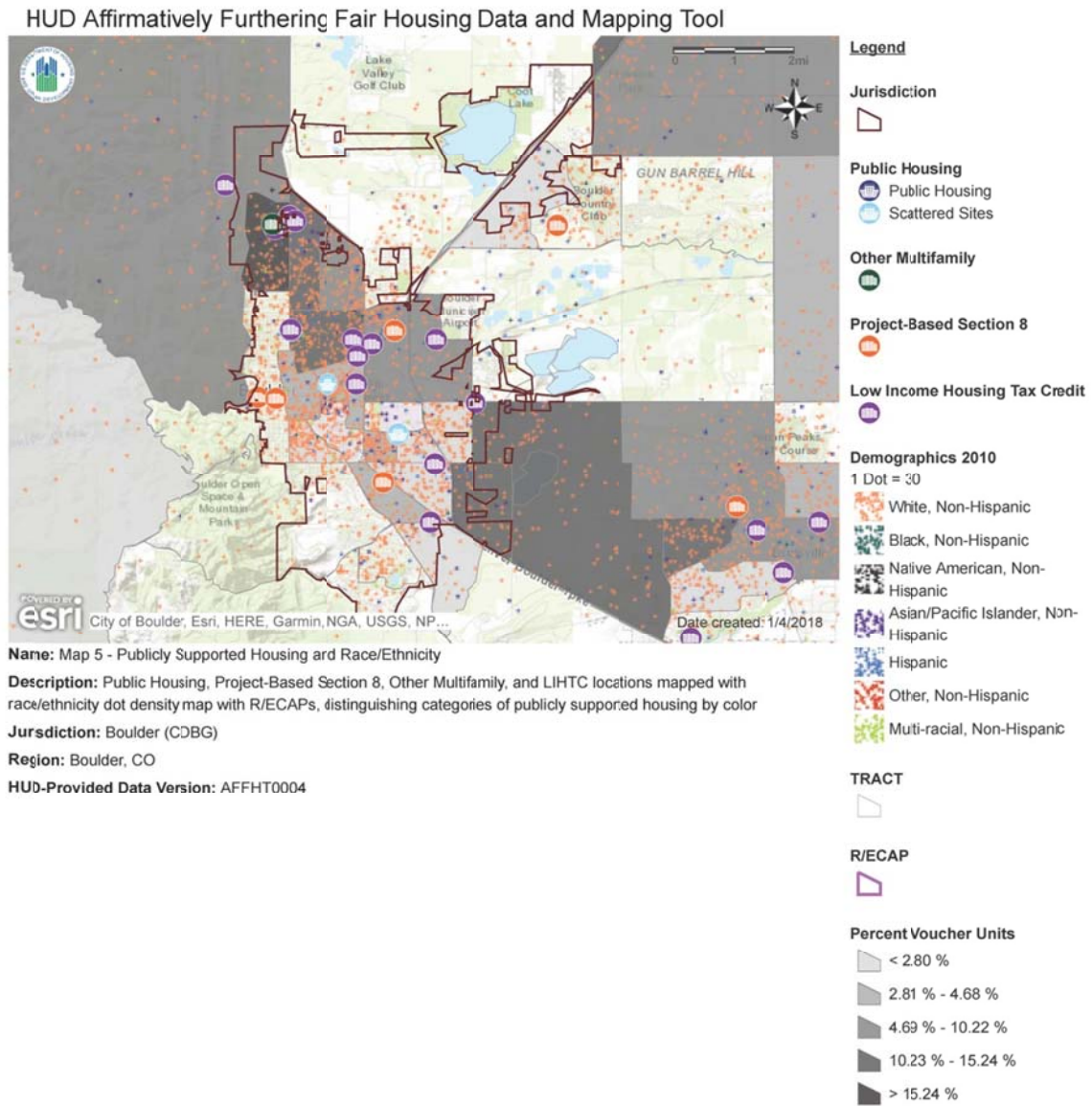
Figure III-20.
Location of Voucher Holders, Aurora, 2017



Source: Aurora Public Housing Authority.

Figure III-21 shows publicly supported housing in the City of Boulder, which is distributed relatively evenly throughout the city considering areas with low density are open space or mountainous. The City of Boulder also provides additional affordable housing through its programs, which supplement the inventory and distribution of affordable housing throughout the city.

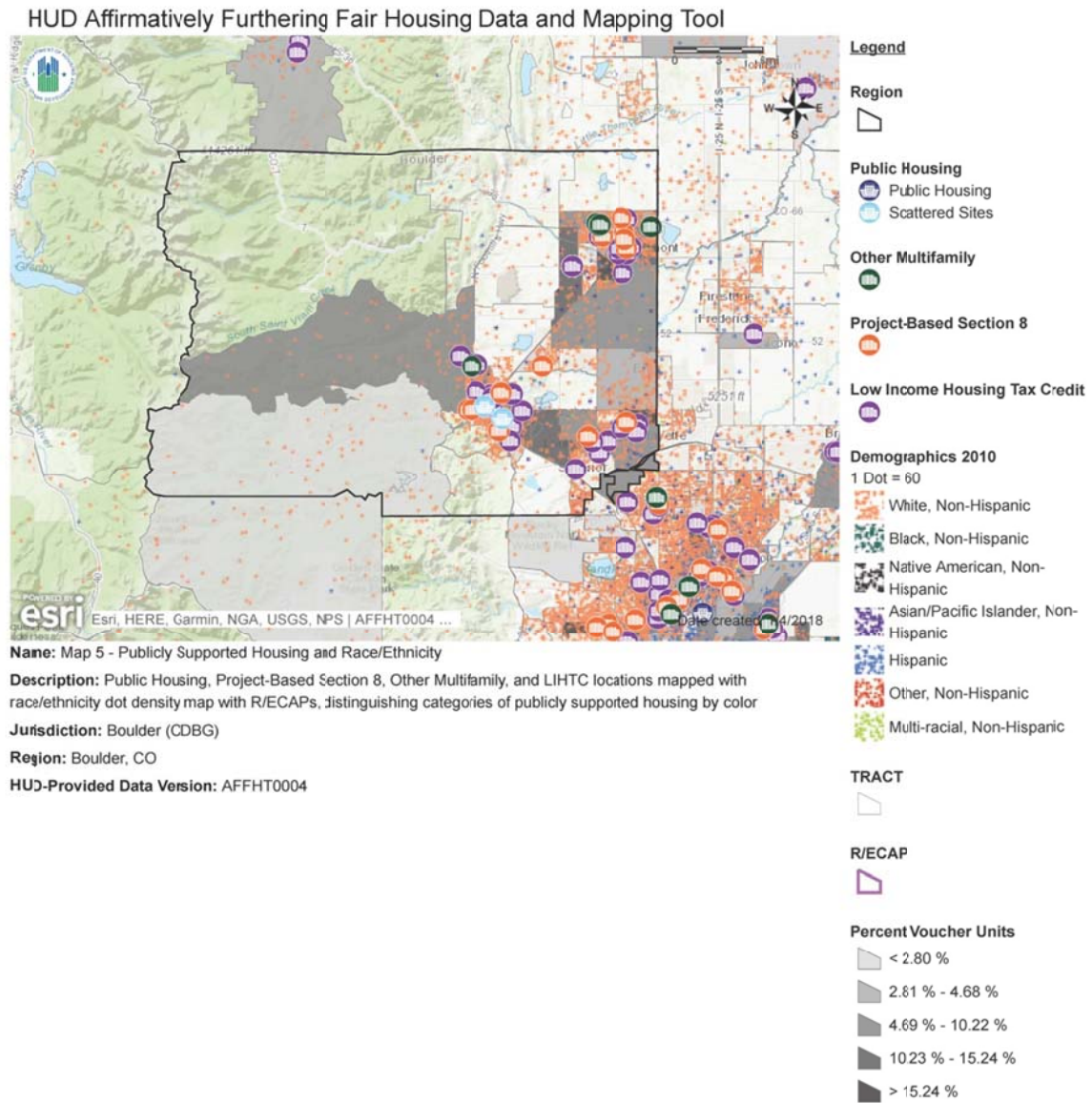
Figure III-21.
Map 5 – Publicly Supported Housing, Boulder, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

Figure III-22 shows the distribution for Boulder County. Housing options and vouchers are well distributed among the representative jurisdictions.

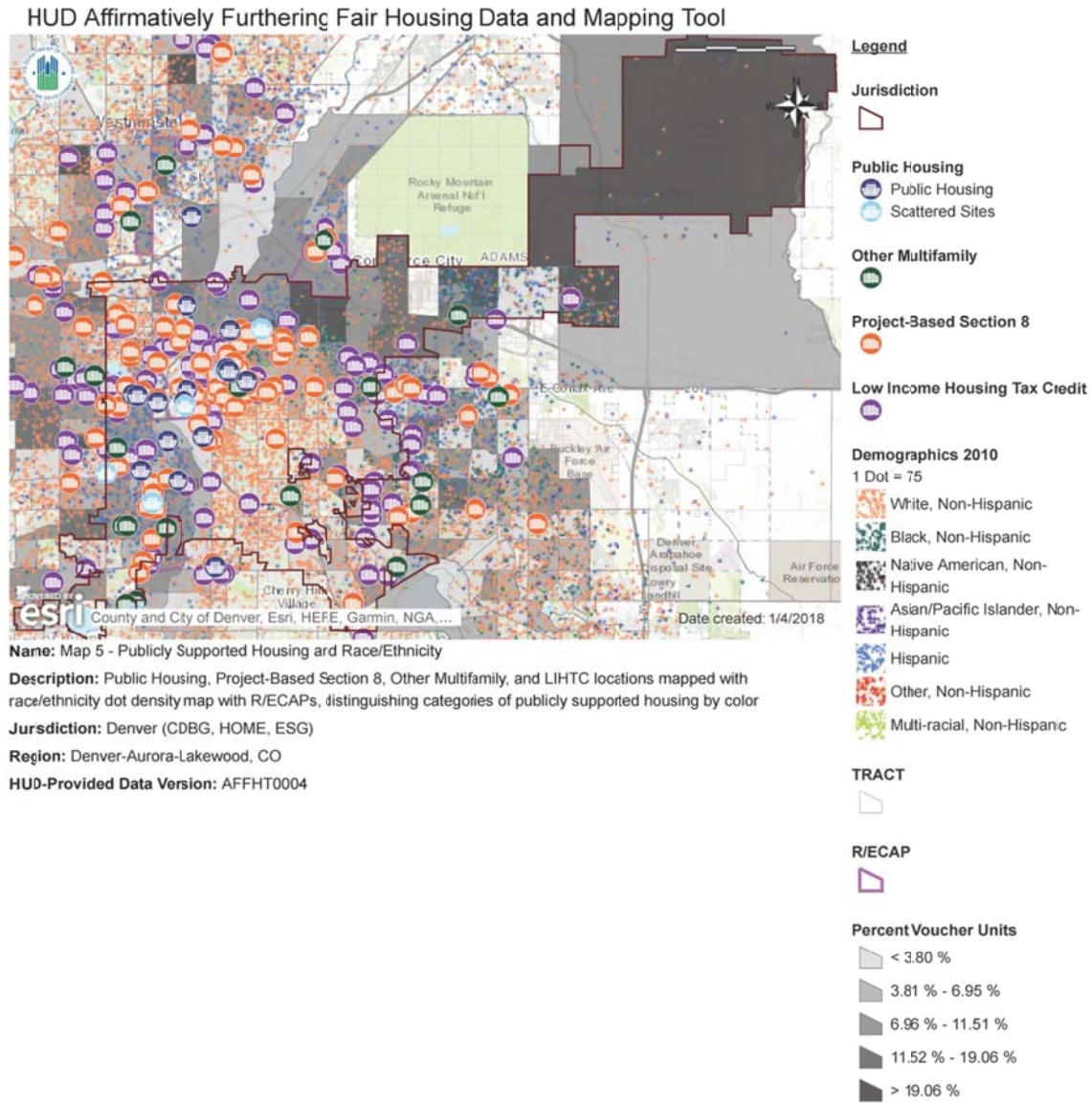
Figure III-22.
Map 5 – Publicly Supported Housing, Boulder County, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

As shown in Figure III-23, the City of Denver has a large number of publicly supported housing properties, some of the most in the region. All types of publicly supported housing are distributed throughout the city, with a few exceptions in more wealthy neighborhoods such as Cherry Creek, Hilltop, and Washington Park. The majority of LIHTC, project-based section 8, and other multifamily properties are concentrated in Downtown Denver or along Colfax Avenue, where more resources are located.

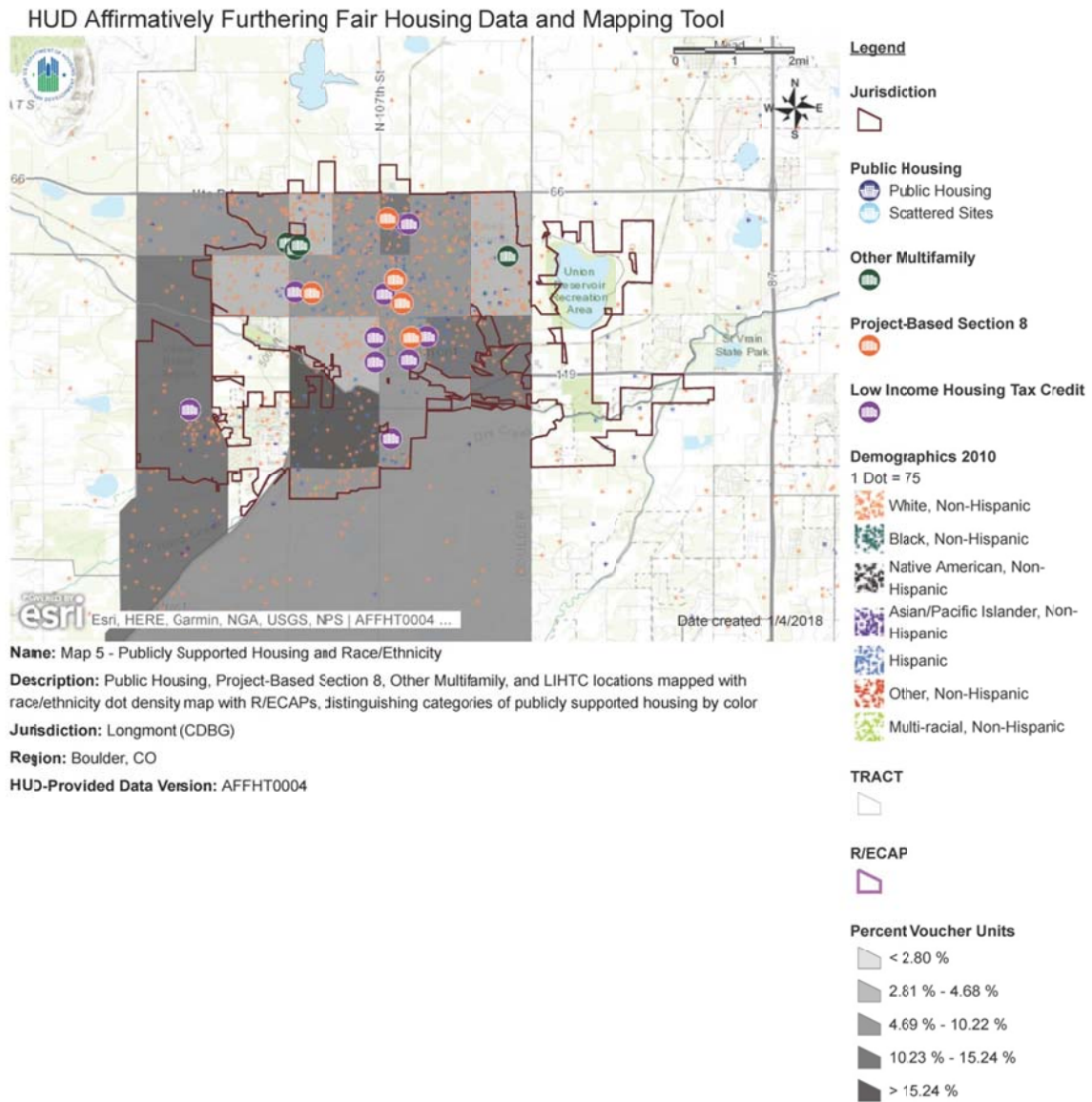
Figure III-23.
Map 5 – Publicly Supported Housing, Denver, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

Figure III-24 shows publicly supported housing in Longmont. Multiple project-based section 8 properties, LIHTC properties, and housing vouchers are clustered around major transportation corridors. As expected in major corridors, these residents have good access to public transportation and low transportation costs.

Figure III-24.
Map 5 – Publicly Supported Housing, Longmont, 2010

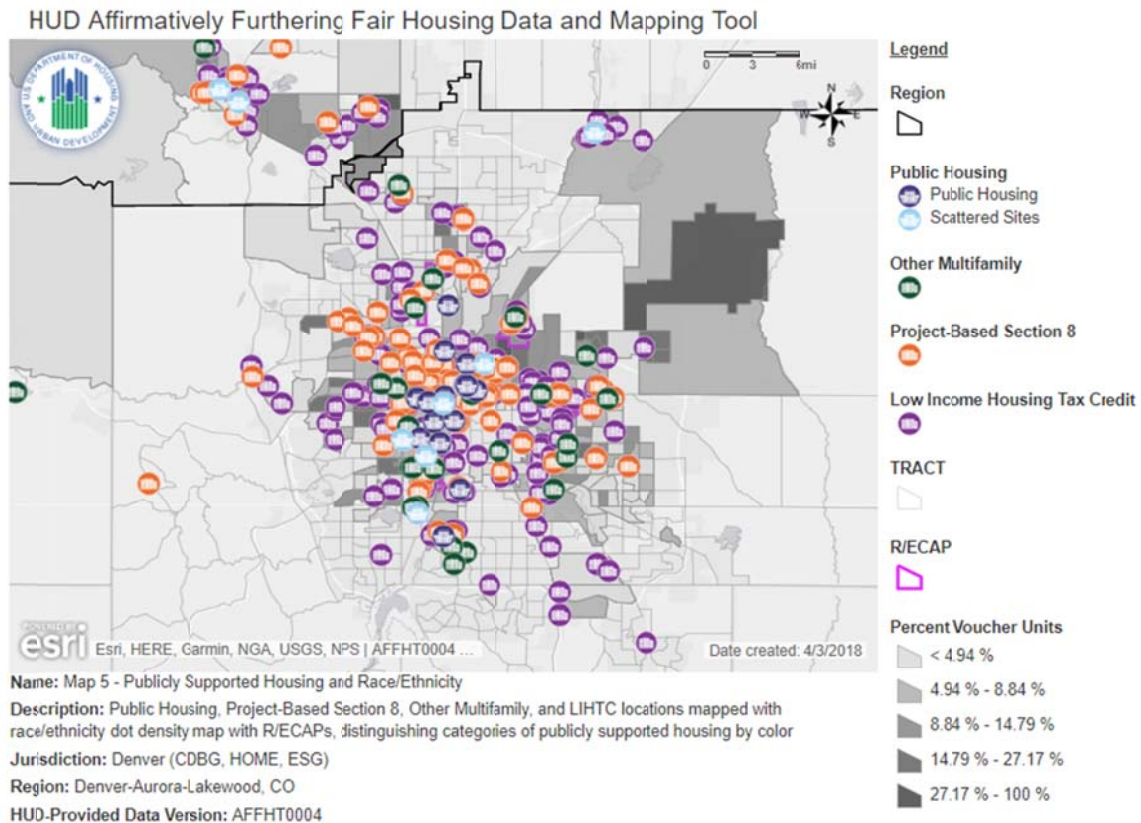


Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

Overall, publicly supported housing in the metro region is located in more heavily populated areas along major corridors, often where concentrations of Hispanic and/or African American/Black residents live.

Some of the high income and less diverse areas in the region have little to no publicly supported housing. Douglas County and Cherry Creek, where households have good access to proficient schools, low poverty neighborhoods, and employment, have almost no publicly supported housing. The only types of properties that exist around these areas are LIHTC.

Figure III-25.
Map 5 – Publicly Supported Housing, Denver Metro Region, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

PHA Policies

Public housing providers, whose units are nearly always oversubscribed, commonly include preferences for certain resident and household types. These preferences can reflect community needs (e.g., worker housing preferences are very common in mountain communities) and unmet demand for housing for certain resident groups (e.g., persons experiencing homelessness, domestic violence survivors, veterans). Community preferences have come under criticism recently for their potential to restrict housing access, even if they are well-intended.

The housing authorities have local preference policies for their voucher programs and property portfolios which, depending on weight and number of preferences met, move applicants higher on a waitlist. Some of these preferences include age, live/work/school jurisdictions, having a disability, having children in their household, and, in the Boulder region, whether they were displaced by the 2013 Flood.

While some preferences are non-negotiable, as they are required by investors or contribute to the intent to house a specific population, others may unfairly disproportionately affect diverse applicants. Applicants with preferences—who rise to the top of a list—move other applicants, including those who may have applied earlier, lower on a list.

Best practices to avoid discriminatory impacts of local preference policies include:

- Residency preferences should extend beyond a jurisdictional boundary, especially if the jurisdiction's racial, ethnic and/or income distribution does not reflect the region. By basing policies on work, not residency, housing authorities would contribute to a more equitable tenant selection plan.
- Residency preferences established to combat displacement caused by gentrification must be able to demonstrate that they are not purely exclusionary in nature, that they do have the intended effect of maintaining opportunities for residents vulnerable to displacement.

The Colorado Housing and Finance Authority (CHFA) monitors demographics and affirmative marketing of the developers awarded the Low Income Housing Tax Credit (LIHTC). Property owners are required to provide CHFA occupancy and demographic data of tenants once leasing begins on a monthly basis. Demographic data is also required on an annual basis in the form of a yearly reporting submission to CHFA. This demographic data, according to a CHFA staffer, is utilized to evaluate program-wide CHFA goals. However, the data are not used to determine if specific properties are achieving demographic objectives and/or meeting unmet market need of specific populations.

Local government role. Local jurisdictions also play a critical role in addressing disproportionate housing needs. On the programmatic side, local jurisdictions make decisions about how to distribute housing and community development funds among various programs. More significant is governmental influence over the built environment. To ensure that direct and indirect government activities and influence is equitable, local governments should:

- Regularly complete analysis of the characteristics of the beneficiaries of housing and service programs relative to the income-adjusted resident population.
- Require that developers receiving public subsidies (monetary or in the form of density bonuses and fast track review) use affirmative fair housing marketing practices;
- Monitor how public sector investments can contribute to economic changes in neighborhoods, possibly accelerating displacement of low income residents; and
- In making planning decisions, be aware of how the built environment communicates inclusiveness or exclusiveness to different types of residents.

Aurora Housing Authority

Application process. AHA uses a one- or two-step application process, depending on the length of time that applicants may need to wait to receive assistance.

The one-step process is used when a family is selected from the waiting list within 60 days of the date of application. The family must provide all necessary material in the application (i.e. basic information such as age and occupancy, income, rental history, credit report, and criminal record) to establish family eligibility and level of assistance.

When it's expected that a family will not be selected from the waiting for at least 60 days of the date of application, AHA uses the two-step process. In this process, AHA only requires a family to provide enough material to make an initial assessment of eligibility and to determine placement on the waiting list. Once selected, the family will then need to provide all the necessary material to establish both eligibility and level of assistance.

Households can obtain application forms from the AHA's office or properties during hours listed in the open waitlist announcement. The process to obtain the application could create barriers for some households that are unable to visit the office or property during open hours. To accommodate households that may have difficulty picking up the application, AHA will mail applications on request. Completed applications can be mailed, emailed, or submitted in person during the hours specified in the open waitlist announcement.

Preferences. AHA gives preferences to elderly, near elderly, and disabled families in the housing authority's project known as Buckingham Gardens Apartments. Otherwise all applicants are housed using date and time of a completed application.

All families with children, elderly families, and disabled families have an admission preference over singles. Single applicants who are elderly, disabled, homeless or displaced are given a selection priority over all "Other Single" applicants regardless of preference status.

AHA matches the characteristics of the available unit to the applicants available on the waiting lists. By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application.

Rejection of units. AHA determines which vacant units are ready for occupancy first. Applicants who are on the top of the waiting list, have been determined eligible, and are suitable as tenants, are offered the oldest available unit of a suitable size and type.

If more than one unit of appropriate size and type is available, the first unit that is ready for occupancy will be offered first.

Applicants must accept the unit offer within ten calendar days of the offer date. If AHA is unable to contact an applicant by telephone, they will send a letter.

If the applicant refuses the unit offered, they will be placed at the bottom of the waiting list. If the applicant is willing to accept the unit offer, but is unable to take occupancy for good cause, then they will not be placed at the bottom of the waiting list.

Reasonable accommodations. It is the AHA's policy to provide services to all residents and applicants for housing assistance and to provide reasonable efforts to accommodate persons with disabilities, as well as those persons with language and literacy barriers. Reasonable accommodation is applicable to all situations when a family initiates contact with AHA, AHA initiates contact with a family, and when AHA schedules/reschedules appointments of any kind.

Criminal history. In an effort to prevent criminal activity, as well as other patterns of behavior that pose a threat to the health and safety of other residents, AHA conducts a criminal history check for all applicants who are 18 years of age, to determine violent or drug-related criminal activity (applicants are also subjected to the lifetime sex offender registration requirement). No member of the applicant's family may have engaged in drug related or violent criminal activity within the past ten years. While the focus of AHA's policy is on violent or drug-related criminal activity, the language in their policy is broad and is not limited to their definitions; therefore committing minor crimes may also prohibit a person from eligibility.

VAWA. AHA residents have the following protections under VAWA:

- An incident(s) of actual or threatened domestic violence, dating violence, or stalking will not be a "serious or repeated" violation of the lease by the victim or threatened victim of that violence and will not be good cause for terminating the tenancy or occupancy rights of or assistance to the victim of that violence; and
- Tenancy or assistance will not be terminated by the AHA as a result of criminal activity, if that criminal activity is directly related to domestic violence, dating violence, or stalking engaged in by a member of the assisted household, a guest, or another person under the tenant's control, and the tenant or an immediate family member is the victim or threatened victim of this criminal activity.

Other potential fair housing issues. Although AHA defines their policies and procedures in the manual, a person's experience with the application process and/or certain housing programs may differ. During community engagement activities in Aurora, both public housing residents and voucher holders provided insight into their personal experiences.

Some AHA voucher holders who participated in the community engagement process expressed the difficulty of using vouchers, as well as difficulties with the application process.

For residents who require reasonable accommodations for a language barrier, they found that AHA initially provided an interpreter, but as they continued in the application or renewal process, they needed to communicate by writing or bring their own interpreter. These voucher holders believed this was a violation of the Americans with Disabilities Act (ADA) and it made an already stressful process much more difficult.

When it came to using the voucher, some residents felt that the existing AHA policies combined with source of income discrimination made it almost impossible to live in a good neighborhood with better access to opportunities. The length of time it takes for AHA to approve a unit for a voucher holder can take several months and landlords that may initially accept the voucher eventually deny the applicant because of the long wait. If the applicant finds a unit above the rent limit, they were told they would be fined by AHA, rather than being able to pay the difference.

The experience of residents living in public housing in Aurora differed from voucher holders and focused more on the properties rather than the application process. During a focus group with public housing residents, the biggest concerns were identified as safety and security, communication with management, and maintenance. While they recognized that AHA lacks

funding to address all of their issues, residents just want to feel safe and comfortable in their home and be better informed by management about maintenance activities and general property updates. Based on feedback gathered during the focus group, properties with larger populations of African American/Black and Hispanic residents, large families with children, people with limited English proficiency, and people with disabilities appeared to be disproportionately impacted by these problems.

Boulder County Housing Authority

Application process for Section 8 vouchers. When a family submits an application to BCHA to receive HCV assistance, they must provide all the information needed to determine eligibility. Similar to AHA properties, BCHA uses a one- or two-step application process for vouchers. The one-step process is used when a family is expected to be selected from a waiting list or lottery pool within 60 days of the date of application and the two-step process is used when a family is not expected to be selected for at least 60 days from the date of application.

When waiting lists are open, households who want to apply can pick up applications from the main office or apply online. During the lottery opening periods, households can apply online through an electronic application on BCHA's website. For households without access to a computer, BCHA will set up assistance sites in physically-accessible locations to provide computers and application assistance, as needed. Paper applications or another reasonable effort to accommodate an applicant's specific needs will be made under a reasonable accommodation request.

Completed applications must be submitted online, by fax, or in person during normal business hours.

Application process for PHA units. As stated in their Affordable Rental Waitlist Procedures, BCHA accepts applications at any time for their affordable properties. Once the application is received, applicants will be placed on the waitlist based on their location choice (Longmont, Louisville, Lafayette, Nederland, or Lyons properties).

Applicants are not allowed to choose a specific property or unit, but they may note a preference on their application. Regardless, the applicant will be offered the first unit available and the application will not be held until the unit with the requested preference becomes available, unless the applicant requires an ADA-compliant unit.

Applicants are added to a waitlist within two weeks of receipt by BCHA staff. Applicants receive a mailed letter or email that confirms their application has been received and to which location waitlist they were added. This letter also specifies the waitlist procedures and removal process.

Applicants are placed on the waitlist based on the number of bedrooms they have requested and the date and time of their original application. If applicable to a specific development, applicants will also be prioritized by the waitlist preference system.

Currently, more than 800 residents are on the BCHA waitlists for rental units and all waitlists are closed. BCHA does not open up waitlist until vacant unit is available and they have gone through 5 waitlisted applicants. Waitlists open up about every two years.

Preferences. BCHA's waitlist preference is based on a point system, where certain preferences are given higher or lower point. The preferences are:

- Families affected by local disaster= 25 pts
- In-Place residents currently living in an approved PBV Unit for local preference = 30 pts
- Families eligible for the FSS program= 12 pts
- Families who need assistance for frail older adult = 12 pts
- Elderly and/or Disabled = 5 pts
- Families who are in good standing with TBRA program = 10 pts (case-by-case)
- Families with child/children = 5 pts
- Local Residency = 5 pts

BCHA also offers a preference to any family that has been terminated from the HCV program due to insufficient program funding.

BCHA may want to re-evaluate the distribution of points in their point system, which gives less weight to persons with disabilities and families with children, given the disproportionate needs identified by persons with disabilities and the challenges finding housing near Boulder County places of employment expressed by families participating in this study. BCHA should also include Work in its residency preference to avoid fair housing concerns associated with residency preferences.

Rejection of units. BCHA allows applicants to refuse an available unit offer one time. If the same applicant refuses a second available unit, then they are removed from that particular waitlist.

Applicants will be removed from all other affordable waiting lists once they become a tenant. If in the future the tenant wishes to move from one property to another, they have to apply to the respective waiting list.

BCHA purges the waiting list as needed. BCHA will mail a letter or email the applicant asking them to respond if they'd like to remain on the waiting list. It is the applicant's responsibility to respond to the inquiry within the outlined timeframe. If the applicant does not respond, BCHA staff will remove them from the waiting list.

Reasonable accommodations. Applicants and residents must show that a requested accommodation may be necessary, by showing an identifiable relationship between the request and the individual's disability. Reasonability is determined on a case-by-case basis.

BCHA will approve a reasonable accommodation request for a person with a disability when one is necessary to insure equal access to amenities, services, and programs. Accommodations will be made up to the point of structural infeasibility, undue financial and administrative burden, or requiring fundamental changes to the program.

BCHA also takes reasonable steps to ensure access to their programs and activities by persons with limited English proficiency.

Criminal history. A National Background Check is conducted for all adult household members when applying for assistance through BCHA. Applicants may be denied housing for any of the following:

- Reliable evidence, including arrests and convictions, that the applicant committed a sexual crime; or
- Reliable evidence of use of methamphetamine (meth) in the last 12 months or use of a controlled substance other than meth in the last 6 months; or
- Reliable evidence, including felony arrests and convictions within the past 3 years, that indicates a health and safety risk to persons or a risk to property; or
- Reliable evidence, including a record of arrests and convictions for misdemeanors or felonies that indicates a health and safety risk to persons or a risk to property.

VAWA. BCHA provides a form for applicants to fill out to show that they are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that they wish to use their rights under VAWA.

For applicants that qualify for housing under BCHA or for a resident currently receiving assistance, denial of admission or assistance, termination, or eviction from rental unit because they are or have been a victim of domestic violence, dating violence, sexual assault, or stalking is not permitted.

BCHA may divide a lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking. In the event of eviction or termination in this manner, BCHA will not take away the rights of eligible tenants to the units or otherwise punish remaining tenants.

Upon request, BCHA may allow a tenant to move to another unit because of an incidence of domestic violence, dating violence, sexual assault, or stalking. The move is subjected to the availability of other units, but the tenant is allowed to keep their assistance.

Boulder Housing Partners

Application process for Section 8 vouchers. BHP uses a lottery system for their vouchers. Initially, households only need to provide information needed to make the initial assessment of eligibility and to determine eligibility to be randomly selected for the lottery. Although the lottery is currently closed, it opens as needed and depending on funding availability. Lottery forms are not accepted when the lottery is closed. When the lottery opens, a public notice is

placed in the local newspaper, on BHP's website, and through social media. Households may apply for the lottery online through BHP's website.

For Section 8 HCV Project-Based Assistance, the Housing First Program, Bringing School Home Communities, and for the studio and one-bedroom units at Boulder Communities Properties, the application process differs slightly. Applicant selection and waiting list management for these properties or programs is done by the service provide or owner of the site. Once the service provider or owner determines the applicant is eligible, they are then referred to the HCV program to be screened for the voucher assistance.

Application process for PHA units. Using a two-step application process, BHP initially requires applicants to provide the information needed to make an initial assessment of eligibility and to determine placement on the waiting list. When selected from the waiting list, an applicant is required to provide all necessary information to establish eligibility and rent amount.

All waiting lists are currently closed and when any or all waiting lists are open, a public notice is posted in the newspaper. Waiting lists are opened when it's been determined that there are not enough applicants on the waiting list.

When waiting lists are open, application forms can be obtained from BHP's office, their website, or by telephone and mail when requested. When completed, applications can be returned by mail, fax, or submitted in person by the deadline.

Preferences. BHP uses the following preferences:

- **Residency:** Applicants who are residents of, or work in, the city of Boulder receive priority on the waiting list
- **Singles:** A single person who is elderly (62 years of age), or disabled will be admitted before other single person(s)
- **Homeless Preference:** Applicants who are homeless as based on the U.S. Code. Applicants who are homeless within the City of Boulder are granted the residency preference, but this is not an additional preference.

Rejection of units. When a family is selected from the waiting list, BHP will notify the family by first class mail. If the notification letter is returned with no forwarding address, the family will be removed from the waiting list. If the family does not respond to the letter and it was not returned to BHP, the family will also be removed from the waiting list.

Applicants may refuse to accept a unit offer for good cause, which includes situations in which an applicant is willing to move but is unable to do so at the time of the unit offer.

Reasonable accommodations. BHP asks all applicants and participants if they require any type of accommodation in writing, on the intake application, reexamination documents, and/or notices of adverse action.

To request a reasonable accommodation, BHP encourages households to make a request in writing using one of their reasonable accommodation forms. However, BHP will consider the accommodation any time the family indicates that an accommodation is needed whether or not a formal written request is submitted.

For applicants or participants with limited English proficiency (LEP), BHP utilizes a language line for telephone interpreter services. If an LEP language group constitutes 5 percent or 1,000 persons, whichever is less, of the total population of eligible persons, BHP will provide written translations of vital documents. If there are fewer than 50 persons in a language group, BHP provides written notice in the primary language of the right to receive competent oral interpretation of written materials, free of cost.

Criminal history. BHP conducts a criminal background check for all adults 18 years of age and older. BHP denies any application if the person has:

- Felony convictions within the past five years;
- Felony convictions involving violent or sexual crimes, or the use, or manufacturing or distribution of methamphetamines; or
- A chronic history of misdemeanor convictions.

The criminal background check includes, but is not limited to, any record of convictions, arrests, or evictions for suspected drug-related or violent criminal activity of household members within the past 5 years. A conviction is given more weight than an arrest or an eviction.

In making its decision to deny assistance because of criminal history, BHP considers the preponderance of the evidence—evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it—and the Violence Against Women Act. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance.

VAWA. BHP acknowledges that a victim of domestic violence, dating violence, or stalking may have an unfavorable history that may warrant denial under their policies. BHP considers such factors in their decision to deny assistance and may decide not to deny assistance.

If BHP makes a determination to deny admission to an applicant family, the PHA will include in its notice of denial:

- A statement of the protection against denial provided by VAWA;
- A description of PHA confidentiality requirements; and
- A request that an applicant wishing to claim this protection submit to the PHA documentation meeting the specifications below with their request for an informal review.

Other potential fair housing issues. In May 2017, BHP's Housing First program was selected for a monitoring review by HUD for their level of compliance with the fair housing and civil rights requirements. HUD identified four areas of needed improvements to meet compliance standards:

- **Non-Discrimination Notice:** HUD’s review revealed that BHP does not consistently provide a Section 504 non-discrimination notice within printed and informational materials for participants, beneficiaries, applicants, and employees. BHP has agreed to provide a copy of its notice along with copies of revised materials, including program applications and any web pages that provide information about BHP’s housing programs.
- **Reasonable Accommodation Policies and Procedures:** To ensure full compliance with the Section 504 reasonable accommodation policy, BHP was asked to update their forms designed to implement its reasonable accommodation procedure by changing or eliminating language that was non-compliant.
- **Affirmative Marketing:** Under affirmative marketing regulations, BHP was asked to revise their program applications to prominently display the complete equal housing opportunity logo.
- **Affirmatively Furthering Fair Housing:** To meet AFFH regulations, BHP was encouraged to examine their current criminal records policy and preference system to ensure that none of these policies were impediments to fair housing choice. BHP agreed to conduct routine civil rights analyses to determine whether implementation of their policies constituted differential treatment based on the Fair Housing Act’s protected classes.

If BHP properly complies with HUD’s fair housing and civil rights requirements identified in their monitoring review, they will be better prepared for any future fair housing issues that may arise.

Denver Housing Authority

Application process. Similar to other PHA’s in the region, DHA works under a two-step application process, requiring families to provide only the information needed to make an initial assessment of eligibility and placement on the waitlist.

Interested households can obtain an “interest card” on DHA’s website. As requested, DHA will provide an accommodation for persons with disabilities who need additional assistance with obtaining an interest card.

DHA reviews the completed interest cards and make a preliminary assessment of eligibility. Eligible households are placed on the interest card waiting list according to preference(s) and the date and time their completed interest card is received by DHA. Placement on the interest card waiting list is only the first part of the two-step process and does not indicate that the household is eligible for admission.

Prior to opening the active waiting list, DHA gives public notice by publishing information on media outlets and on their website. They will indicate where, when, and how applications will be received in the public notice.

DHA will close their waiting list if they have an adequate pool of applicants. DHA determines whether the waiting list will close completely or restrict additional intake by preference, project type, or unit size/type.

If a household is selected from the interest card waiting list and has completed a full application packet, they are required to participate in an eligibility interview.

When DHA determines that a household is eligible and satisfies all requirements for assistance, they will be notified of their eligibility to be placed on approved waiting list and provide the approximate date of occupancy.

Preferences. Households are selected from the interest card waitlist based on preference. Among applicants with the same preference, households will be selected on a first-come, first-served basis according to the date and time their completed application. DHA has local preferences and gives priority to serving families that meet those criteria.

DHA gives local preferences to the following:

- Homeless transitional families
- Families with an income from Old Age Pension, Social Security, Supplemental Security Income, Private Pension, Federal Wage, Employed, Military, Assets, VA Pension, or Workman's Compensation.

Rejection of units. If an applicant for conventional public housing rejects the unit offer or fails to make a decision as to whether they want the unit offered within 3 working days of offer, they will be offered a second suitable unit. If the applicant rejects the second offer or fails to make a decision within 3 working days, then they will be removed from the active waiting list. For DHA's two HOPE VI Redevelopment projects, applicants only get one unit offer and if it's rejected within three working days, they will be removed from the active waiting list.

Applicants may reapply for assistance if the waiting list is open.

An applicant will not be considered to have been "offered a unit" if:

- The unit offered is not the proper size or does not contain the necessary accessibility features;
- The applicant is 62 years of age or older and requested a unit designated as "elderly only" but was not offered such a unit;
- The applicant requires an accessible unit but was not offered such a unit;
- An elderly family declines an offer for designed housing; or
- The applicant has good cause for refusing the unit.

Reasonable accommodations. DHA's policy is to provide reasonable accommodation for applicants, residents, and clients with disabilities when an accommodation is necessary to provide equal opportunity to participate in, or benefit from, housing programs.

Reasonable accommodation includes a modification or change DHA can make to its procedures, rules, units, or common areas, as well as the provision of appropriate auxiliary aids where necessary to facilitate communication with a person with a disability.

The reasonable accommodation request must show an identifiable relationship between the accommodation and the disability and not result in undue hardship (a significant or undue burden).

Forms for reasonable accommodation are available on request from DHA staff and are also available on their website. It is the individual's responsibility to request an accommodation and they must explain what type of accommodation is needed. If an individual is unable to provide a request in writing or need assistance in complete the form, they must contact DHA. DHA has a designated 504 coordinator that is responsible for making determinations for requests of accommodations in compliance with their guidelines.

DHA takes affirmative steps to communicate with persons with LEP and has an LEP plan to ensure all programs, services, and benefits are accessible to eligible individuals.

Criminal history. DHA screens for an applicant's history of criminal activity involving crimes of physical violence to persons or property and other criminal acts that would endanger other residents.

If a household is currently engaged in or has engaged in drug-related or violent criminal activities within the past 7 years, a household will be denied assistance. This includes any record of convictions, arrests, or evictions, but convictions are given the most weight.

In the event of unfavorable criminal history, DHA will consider the time, nature, and extent of the applicant's conduct. DHA will also consider whether the cause of the unfavorable information is covered by VAWA protections.

VAWA. DHA is prohibited from denying admission to an otherwise qualified applicant on the basis that the individual is or has been a victim of domestic violence, dating violence, or stalking. DHA recognizes that a victim of domestic violence, dating violence, or stalking may have an unfavorable history that would warrant a denial under their policies. If an applicant claims protection against denial of admission under VAWA, DHA will request that the application provide documentation supporting the claim.

Longmont Housing Authority

Application process. LHA uses a two-step application process which initially requires applicants to provide the information needed to make an initial assessment of eligibility and to determine placement on the waiting list. LHA will notify a household of their preliminary eligibility determination within ten days of receiving a completed application. Placement on the waiting list is only the first part of the two-step process and does not indicate that the household is eligible for assistance.

Households can obtain application forms from the LHA office or, on request, by mail. Completed applications must be returned to LHA by mail, fax, electronically, or in person during normal business hours.

The section 8 program is based on a lottery system, which is opened annually, depending on funding. LHA closes their waiting list when the estimated waiting period for assistance reaches 24 months. LHA is not currently taking application until the waiting list is open again. When the waiting list is reopened, LHA gives public notice at least ten days prior to the date applications will be accepted.

When selected from the waiting list, an applicant is required to provide all necessary information to establish eligibility and rent amount.

Any household selected from the waiting list are required to participate in an interview to determine eligibility.

Preferences. Households are selected from the waiting list based on targeted funding or selection preference(s), and in accordance with LHA's hierarchy of preferences. The waiting list is organized by lottery drawing number among applicants with equal preference status.

LHA offers the following preferences:

- Households who live, work, or have been hired to work in the City of Longmont or Boulder County;
- Any household that has been terminated from their voucher program due to insufficient funding; and
- Extremely low-income households on an as-needed basis to ensure the income targeting requirement is met.

Rejection of units. LHA notifies households by first class mail if they are selected from the waiting list. If the notification letter is returned with no forwarding address, the household is removed from the waiting list. A notice of denial is then sent to the household's address of record and any alternate address.

Reasonable accommodations. Under LHA's programs, special rules apply to persons with disabilities and to any household with a family member with a disability. LHA makes all aspects of their programs accessible to persons with disabilities and considers reasonable accommodation requests based upon the person's disability.

LHA also recognizes that language for LEP persons can be a barrier to accessing benefits or services, understanding their rights, complying with responsibilities, or understanding any other information provided by their housing programs.

For applicants or participants with LEP, LHA utilizes a language line for telephone interpreter services. If an LEP language group constitutes 5 percent or 1,000 persons, whichever is less, of the total population of eligible persons, LHA will provide written translations of vital documents.

If there are fewer than 50 persons in a language group, LHA provides written notice in the primary language of the right to receive competent oral interpretation of written materials, free of cost.

Criminal history. LHA will deny any household that is currently engaged in or has engaged in the any of the following criminal activity within the past five years:

- Any conviction for drug-related or violent criminal activity;
- Records of arrests for drug-related or violent crime activity (although arrest records are not used as the basis for denial);
- Any record of eviction from public or privately-owned housing as a result of criminal activity;
- Convictions for drug-related or violent criminal activity are given more weight than an arrest.

In making the decision to deny assistance, LHA will consider any factors protected by VAWA and upon consideration of such factors may decide to deny assistance.

VAWA. LHA recognizes that a victim of domestic violence, dating violence, sexual assault, or stalking may have an unfavorable history that would warrant denial under their policies. If LHA makes a determination to deny assistance to an applicant, they will include VAWA information with the notice of denial. LHA will request in writing that applicants wishing to claim protections under VAWA notify them in 14 days.

Other potential fair housing issues. In May 2017, tenants of The Suites apartments, a LHA-managed transitional housing development, were subjected to warrantless police and K-9 searches, in conjunction with LHA. Residents were concerned their rights were being violated because the searches were conducted without a warrant or any arguable exception to the warrant requirement. The Longmont police ended the searches and an outside investigation took place. The City of Longmont settled a lawsuit with the ACLU, but the ACLU has now taken action against LHA by sending them a notice of claim, the pretense to a lawsuit. This legal action is ongoing.

Summary findings, PHA analysis. Overall, the review of PHA programs, policies, and practices, as well as the geographic distribution of publicly-supported housing, did not raise significant concerns. Similarly, the resident focus groups and surveys raised few concerns, other than the need for improved safety in some neighborhoods, and the worry that federal no smoking policies would have an adverse impact on religious practices that involve smoke.

As with all housing providers, the PHAs should continue to monitor and modify their preferences and policies to accommodate changing market needs, adapt to technological innovations, and incorporate current research. To that end, we recommend that the PHAs:

- Examine their criminal history policies in light of recent re-entry research. The Austin/Travis County Re-entry Roundtable is a leading resource for housing policies that balance public safety with re-entry needs. The roundtable recently developed a criminal background screening guide for rental housing providers, which can be found at: http://www.reentryroundtable.net/wp-content/uploads/2018/04/Austin-Criminal-Background-Screening-Guidebook.final_.pdf The PHAs should review this guide against their current policies. As noted above, PHA look back periods vary considerably—and it is difficult to understand why look back periods should be different for neighboring jurisdictions. Adopting consistent practices regionwide would make rules more transparent for applicants and support national best practices to support re-entry efforts.
- Improve the notification process for the opening of wait lists and notification of applications being accepted. Mailing a notification card may not reach people in an unstable housing situation. Similarly, as large printed newspapers decline, alternative ways to announce wait list openings (social media, smaller, targeted newspapers, notifications through social service partners) should be more readily used. Some PHAs in the country use online notifications, which are easier for people in precarious housing situations to access (through computers available at libraries, low cost or free phones, etc).
- Ensure that resident requests for reasonable accommodations and verification of needs associated with the Violence Against Women Act are as sensitive and non-intrusive as possible, respect rights to privacy, and do not re-traumatize victims and their families.
- Continue to examine and adjust preferences to reflect market needs. As demonstrated by this study, the most significant needs in the current market are for large families and persons with disabilities.

Affirmative Marketing in Housing

The way in which both public and private housing providers make housing available can disproportionately impact who has access to housing.

On the development side, units may be sized to favor certain household types; available amenities may welcome certain tenants more than others (e.g., rooftop lounge pools and bars v. playgrounds). Marketing is also influential for how developments are presented (Do websites include diverse set of households and tenants? Are private schools promoted? How is the neighborhood described?) and the types of media used.

A subtle barrier to housing choice can be created through images that communicate exclusion of certain resident types. The Fair Housing Act explicitly prevents discriminatory advertising (e.g., “Not appropriate for families” or “Best suited for single, young, recent college grad”). However, marketing can communicate the same preferences and, whether intentional or not, can create impediments to housing choice.

A review of a sample of websites in the region promoting new housing developments did not raise concerns about barriers in marketing. The vast majority of websites avoid pictures of residents and/or language suggesting a typical resident profile. On the flip side, this neutral

marketing fails to encourage a diverse set of residents to inquire or apply for housing. A preferred alternative would be marketing that alternates between neutral and inclusive.

Publicly supported housing typically gives more attention to affirmative marketing practices—and who occupies their properties (discussed above).

Although not required by the IRS, state housing finance agencies are encouraged to request affirmative fair housing marketing plans (AFHMP) of tax credit program users. An AFHMP should demonstrate that a meaningful effort has been made to identify and attract underserved populations to the housing market area. Some state finance authorities, such as Iowa's, require tax credit developers to also create an AFHMP. CHFA does not require the development of an AFHMP of its tax credit developers.

A Denver-based tax credit property manager interviewed for this project noted that deliberate attention is paid to images presented in marketing materials. According to this manager, it is not uncommon for property owners and managers to avoid using photography of people in marketing materials altogether for concern that certain populations would be excluded or included.

SECTION IV.

Access to Opportunity

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Access to Opportunity

This segment of the study examines Access to Opportunity in education, employment, and transportation—the opportunity areas identified by stakeholders and residents as being the most challenging in the jurisdictions covered in this AI, as well as the greater region.¹ The section focuses on disparities in access to opportunity for persons living in poverty and protected classes, with specific attention given to access for persons with disabilities. This section draws from data and maps provided by HUD, research available at the time this section was written, and findings from the community engagement process.

Initial Opportunity Indicators

To facilitate the Assess to Opportunity analysis, HUD provides a table that measures access to opportunity through opportunity indices. Tables for each jurisdiction are discussed below.² The opportunity indices allow comparison of data indicators by race and ethnicity, for households below and above the poverty line, among jurisdictions, and across regions.

After the indices in the tables were analyzed, the research team determined additional areas of focus for this section. Those are education, employment, transportation, as well as access to opportunity for persons with disabilities.

Six indices were assessed in the initial opportunity analysis. All indices allow comparisons across races and ethnicities and for households living below the poverty level.

To interpret the indices in the tables, use the rule that a higher number is always a better outcome. The index should not be thought of as a percentage—but as an “opportunity score.”

The indices include:

- **Low Poverty Index.** This index measures neighborhood exposure to poverty. The name of this index is a bit counterintuitive: Higher scores mean better access to economically strong (low poverty) neighborhoods.
- **School Proficiency Index.** This index measures neighborhood proximity (within 1.5 miles) of elementary schools with high levels of academic proficiency. Proficiency is measured by 4th grade scores on state administered math and science tests.

¹ “Greater” refers to the seven-county region which includes Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, and Jefferson Counties.

² The opportunity tables were not available for Broomfield at the time this report was prepared.

- **Labor Market Engagement Index.** The index shows the employability of neighborhood residents based on unemployment, labor force participation, and educational attainment.
- **Transit Index.** The transit index measures use of public transit by low income families who rent.
- **Low Cost Transportation Index.** As suggested by its name, this index measures the costs of transportation. It is based on the transportation costs of low income families who rent.
- **Jobs Proximity Index.** The jobs proximity index indicates how close residents live to major employment centers.

Aurora's opportunity indicators table is shown in Figure IV-1. The table shows that:

- Residents of Hispanic descent, especially those living below the poverty level, have very low access to high economic opportunity environments. This is also true of Native American residents and, lesser so, for African American residents.
- African Americans in Aurora are equally as unlikely to live in high opportunity environments in Aurora as they are in the region. This is not true of other races and ethnicities, which have better access regionwide than in Aurora.
- School proficiency is low in Aurora relative to the region, for all residents and residents living below poverty. Similarly, residents in Aurora have lower access to neighborhoods where residents have high levels of labor market engagement.
- Aurora residents have equivalent or higher access to transit and low cost transportation than residents region wide. Yet Aurora residents live farther away from employment centers, suggesting that expansion of employment centers within Aurora would improve job proximity and create even better access to transit and lower transportation costs.

Figure IV-1.
Table 12 — Opportunity Indicators, by Race/Ethnicity, Aurora

(Aurora, CO CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index
Total Population						
White, Non-Hispanic	57.42	32.21	57.73	67.99	72.59	38.54
Black, Non-Hispanic	43.12	20.83	47.33	72.76	78.03	40.25
Hispanic	35.32	18.97	40.23	72.38	78.26	39.54
Asian or Pacific Islander, Non-Hispanic	52.67	30.04	55.55	69.44	74.45	39.55
Native American, Non-Hispanic	44.89	23.23	46.74	71.39	76.31	38.08
Population below federal poverty line						
White, Non-Hispanic	41.75	24.77	48.46	73.47	78.93	43.32
Black, Non-Hispanic	30.01	17.14	36.74	75.23	81.64	42.83
Hispanic	21.64	15.82	32.47	74.23	81.12	41.06
Asian or Pacific Islander, Non-Hispanic	40.50	21.06	42.33	73.46	78.72	44.88
Native American, Non-Hispanic	16.24	20.62	30.09	75.45	82.83	43.49
(Denver-Aurora-Lakewood, CO) Region						
Total Population						
White, Non-Hispanic	68.47	57.55	74.31	63.05	67.30	49.30
Black, Non-Hispanic	44.09	30.32	55.79	72.68	76.40	44.77
Hispanic	42.09	29.55	49.02	69.90	74.65	47.58
Asian or Pacific Islander, Non-Hispanic	63.29	50.69	70.22	66.99	70.36	46.86
Native American, Non-Hispanic	51.51	41.11	59.38	67.61	72.95	50.72
Population below federal poverty line						
White, Non-Hispanic	52.02	45.11	64.50	69.55	76.06	53.73
Black, Non-Hispanic	29.40	24.11	45.55	75.85	81.44	49.28
Hispanic	27.19	20.38	39.84	72.86	79.49	49.24
Asian or Pacific Islander, Non-Hispanic	50.42	42.13	59.60	70.11	75.30	51.03
Native American, Non-Hispanic	31.73	30.36	49.22	74.12	82.04	52.85

Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA.

The indices for **City of Boulder and Boulder County** in Figure IV-2 show:

- Residents of Hispanic descent living in Boulder are more likely to live in high economic opportunity environments than Hispanics in the region overall. This is true for both those living below and above the poverty level. The city’s lack of neighborhoods with concentrated poverty is a factor in this outcome.
- Access to proficient schools is strong for all races and ethnicities and for children living below- and above-poverty. The city also offers very good access to low cost transportation.
- The labor market index—which measures labor force participation and engagement—is very strong across races and ethnicities and poverty levels. However, unemployment data from the U.S. Census paint a less rosy picture. Unemployment data from the 2012-2016 ACS

for Boulder County show a much higher rate of unemployment for Hispanic residents (7.8%) than other residents (5.6% for White, non-Hispanic and 2.9% for Asian residents).

- The city scores lowest on the Jobs Proximity Access, which measures how close residents live to job centers. However, no resident group has significantly poorer access to employment.

Figure IV-2.
Opportunity Indicators, by Race, Ethnicity, and Poverty Level, City of Boulder and Boulder County

(Boulder, CO CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index
Total Population						
White, Non-Hispanic	67.54	72.23	90.21	82.60	89.90	53.88
Black, Non-Hispanic	64.22	72.79	87.87	84.54	91.63	58.83
Hispanic	60.46	69.00	90.43	84.36	90.90	54.88
Asian or Pacific Islander, Non-Hispanic	66.00	73.85	86.79	84.77	91.84	61.75
Native American, Non-Hispanic	65.97	71.07	89.93	83.34	90.56	56.32
Population Below Federal Poverty Line						
White, Non-Hispanic	65.34	70.79	85.80	85.41	92.39	56.21
Black, Non-Hispanic	56.27	64.80	89.04	84.44	92.36	59.25
Hispanic	55.55	71.16	91.47	86.18	91.25	55.27
Asian or Pacific Islander, Non-Hispanic	68.89	71.75	83.47	86.30	92.79	53.73
Native American, Non-Hispanic	59.67	69.54	81.62	87.67	94.71	68.83
(Boulder, CO) Region						
Total Population						
White, Non-Hispanic	68.30	65.89	85.71	73.53	83.72	46.27
Black, Non-Hispanic	66.04	63.89	83.26	76.94	85.39	48.80
Hispanic	51.94	47.47	72.92	78.36	85.51	44.93
Asian or Pacific Islander, Non-Hispanic	71.10	72.05	87.32	77.27	85.04	49.25
Native American, Non-Hispanic	61.31	57.50	79.44	74.85	84.25	46.94
Population Below Federal Poverty Line						
White, Non-Hispanic	62.67	65.15	82.65	80.51	88.86	51.57
Black, Non-Hispanic	58.02	63.48	85.70	81.35	88.90	53.14
Hispanic	43.00	47.61	69.46	81.55	87.68	48.71
Asian or Pacific Islander, Non-Hispanic	67.75	70.19	83.79	82.57	90.76	50.12
Native American, Non-Hispanic	63.54	62.49	82.46	79.08	88.68	59.20

Note: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Source: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA.

The indices for the **City and County of Denver** in Figure IV-3 show relatively low access to high opportunity environments for many residents. African Americans living in Denver have the lowest access to economic opportunity of any jurisdiction.

Yet these residents have better access to quality schools than similar residents in Aurora, except for Hispanic children, where access is the same (and also low). Children of Hispanic descent

living in the Boulder Broomfield Consortium have a much better likelihood of attending high quality schools than in Denver and Aurora, based on the school proficiency index.

Denver’s strongest performance in access to opportunity is in transportation costs (very low), transit access, and jobs proximity.

In sum, the City and County of Denver offers good, inexpensive access to jobs. Residents are very employable and engaged in the labor market. However, the city is challenged by economic segregation that mostly affects residents of color.

Figure IV-3.
Table 12 — Opportunity Indicators, by Race/Ethnicity, City and County of Denver

(Denver, CO CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index
Total Population						
White, Non-Hispanic	53.32	44.31	77.50	76.62	83.15	59.02
Black, Non-Hispanic	36.59	28.15	55.78	75.74	78.23	45.08
Hispanic	28.09	17.67	45.18	74.46	79.50	47.25
Asian or Pacific Islander, Non-Hispanic	42.75	33.70	62.46	76.12	81.62	51.53
Native American, Non-Hispanic	34.27	28.56	57.25	76.31	82.65	54.57
Population below federal poverty line						
White, Non-Hispanic	43.84	41.51	70.57	78.70	86.25	60.15
Black, Non-Hispanic	24.80	25.49	47.71	77.36	81.98	52.11
Hispanic	21.38	15.51	41.85	75.40	81.84	49.84
Asian or Pacific Islander, Non-Hispanic	43.27	37.15	57.77	73.84	79.54	53.62
Native American, Non-Hispanic	29.54	29.67	57.23	78.41	86.60	56.16
(Denver-Aurora-Lakewood, CO) Region						
Total Population						
White, Non-Hispanic	68.47	57.55	74.31	63.05	67.30	49.30
Black, Non-Hispanic	44.09	30.32	55.79	72.68	76.40	44.77
Hispanic	42.09	29.55	49.02	69.90	74.65	47.58
Asian or Pacific Islander, Non-Hispanic	63.29	50.69	70.22	66.99	70.36	46.86
Native American, Non-Hispanic	51.51	41.11	59.38	67.61	72.95	50.72
Population below federal poverty line						
White, Non-Hispanic	52.02	45.11	64.50	69.55	76.06	53.73
Black, Non-Hispanic	29.40	24.11	45.55	75.85	81.44	49.28
Hispanic	27.19	20.38	39.84	72.86	79.49	49.24
Asian or Pacific Islander, Non-Hispanic	50.42	42.13	59.60	70.11	75.30	51.03
Native American, Non-Hispanic	31.73	30.36	49.22	74.12	82.04	52.85

Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA.

The indices for **City of Longmont and Boulder County** in Figure IV-4 show:

- Access to low-poverty neighborhoods is lower in Longmont than in the region overall. This difference exists for all races and ethnicities. Hispanic and Asian residents living below the

poverty level have a low likelihood of living in a low-poverty environment according to the index. Although this is true for the region overall, access is lower in Longmont.

- Access to proficient schools is also lower in Longmont than in the region overall. The data indicate a very significant gap in quality school access for Asian children living below the poverty level.
- The labor market index—which measures labor force participation and engagement—is generally good. The index shows more variance among races and ethnicities for residents living below the poverty level: it is very high for African Americans (consistent with the region) and relatively low for Hispanic and Asian residents.
- Like the City of Boulder and Boulder County, the city scores lowest on the Jobs Proximity Access, which measures how close residents live to job centers. Except for low income Asian residents, no resident group has significantly poorer access to employment.

Figure IV-4.
Opportunity Indicators, by Race, Ethnicity, and Poverty Level, Longmont and Boulder County

(Longmont, CO CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index
Total Population						
White, Non-Hispanic	53.96	36.76	70.26	78.66	84.15	40.69
Black, Non-Hispanic	54.77	36.40	69.37	78.53	84.03	40.66
Hispanic	42.33	27.80	61.26	79.91	85.16	41.71
Asian or Pacific Islander, Non-Hispanic	60.44	47.34	76.57	78.07	83.19	42.01
Native American, Non-Hispanic	49.84	32.91	66.04	78.76	84.33	41.54
Population Below Federal Poverty Line						
White, Non-Hispanic	43.53	30.79	63.75	79.77	85.58	43.37
Black, Non-Hispanic	55.99	64.84	81.75	78.73	84.79	46.34
Hispanic	33.37	31.21	56.26	81.16	86.69	44.63
Asian or Pacific Islander, Non-Hispanic	31.07	13.18	54.52	82.00	86.83	28.96
Native American, Non-Hispanic	68.83	55.62	90.18	75.08	85.66	52.62
(Boulder, CO) Region						
Total Population						
White, Non-Hispanic	68.30	65.89	85.71	73.53	83.72	46.27
Black, Non-Hispanic	66.04	63.89	83.26	76.94	85.39	48.80
Hispanic	51.94	47.47	72.92	78.36	85.51	44.93
Asian or Pacific Islander, Non-Hispanic	71.10	72.05	87.32	77.27	85.04	49.25
Native American, Non-Hispanic	61.31	57.50	79.44	74.85	84.25	46.94
Population Below Federal Poverty Line						
White, Non-Hispanic	62.67	65.15	82.65	80.51	88.86	51.57
Black, Non-Hispanic	58.02	63.48	85.70	81.35	88.90	53.14
Hispanic	43.00	47.61	69.46	81.55	87.68	48.71
Asian or Pacific Islander, Non-Hispanic	67.75	70.19	83.79	82.57	90.76	50.12
Native American, Non-Hispanic	63.54	62.49	82.46	79.08	88.68	59.20

Note: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Source: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA.

Regional comparison. Comparing the Boulder County region to the Denver-Aurora-Lakewood region, the indices suggest that residents, especially African American and Hispanic residents, have much better access to high opportunity environments in the Boulder County region v. Denver-Aurora-Lakewood. There is also a marked difference in access to quality schools for these resident groups.

The Denver region does comparatively well in access to public transit, low cost transportation, and employment.

Overall, the indices indicate that the two regions are a dichotomy, offering different benefits for low income residents: Boulder County offers access to quality schools and lacks concentrated poverty. Denver-Aurora-Lakewood is rich in employment opportunities, which are inexpensive to access. Consistency across the region would be beneficial for all residents, particularly those who must drive long distances for quality jobs and schools.

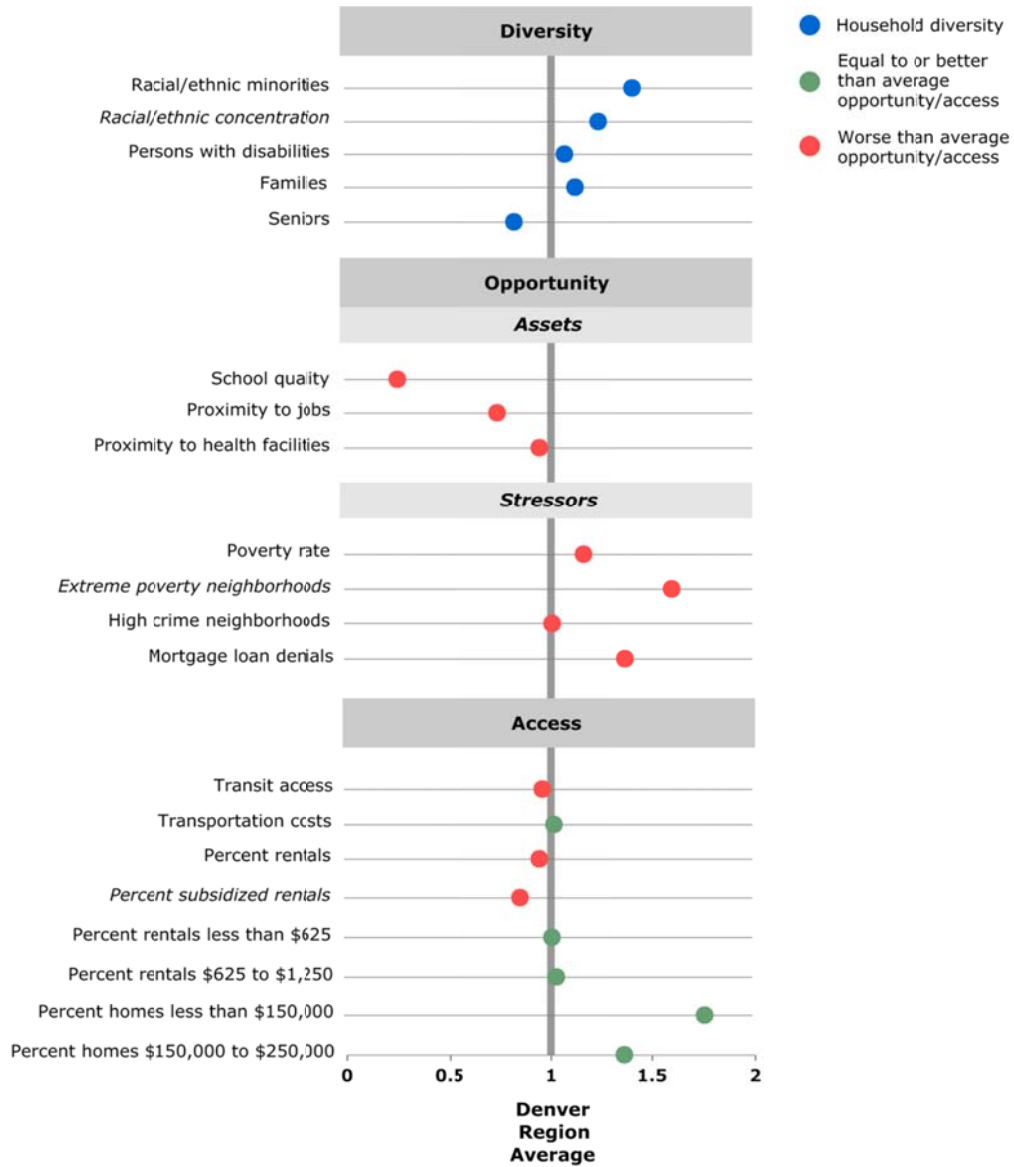
A 2010 analysis of equity indicators for DRCOG's Regional Housing Strategy report used a similar strategy as the opportunity indices above, with enhanced measures of equity in health facilities, crime, residential capital constraints (loan denials), and housing affordability. The outcomes from that analysis are shown in the figures and table that follow.

The analysis found that regional equity differs the most in the:

- Percent of minority residents living in minority-concentrated areas;
- Percent of residents living in neighborhoods with high performing schools;
- Percent of residents living in high crime neighborhoods;
- Access to public transit; and
- Affordable rental housing.

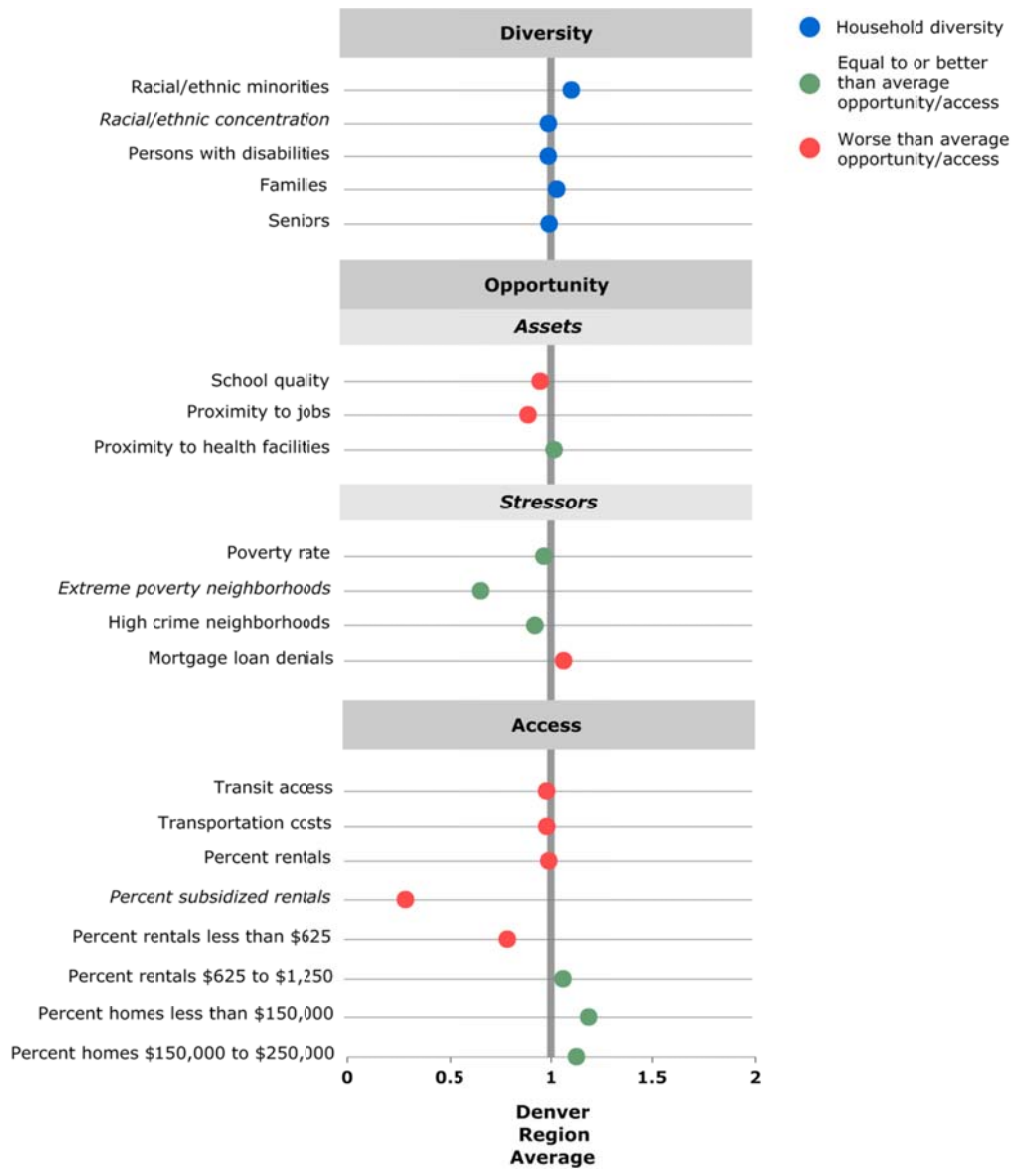
Although the region has changed significantly since 2010, most of these differences remain and are only exacerbated by dramatically rising housing prices and further limitations on the neighborhood choices for low income households.

Figure IV-5.
Adams County Measures of Diversity, Opportunity, and Access



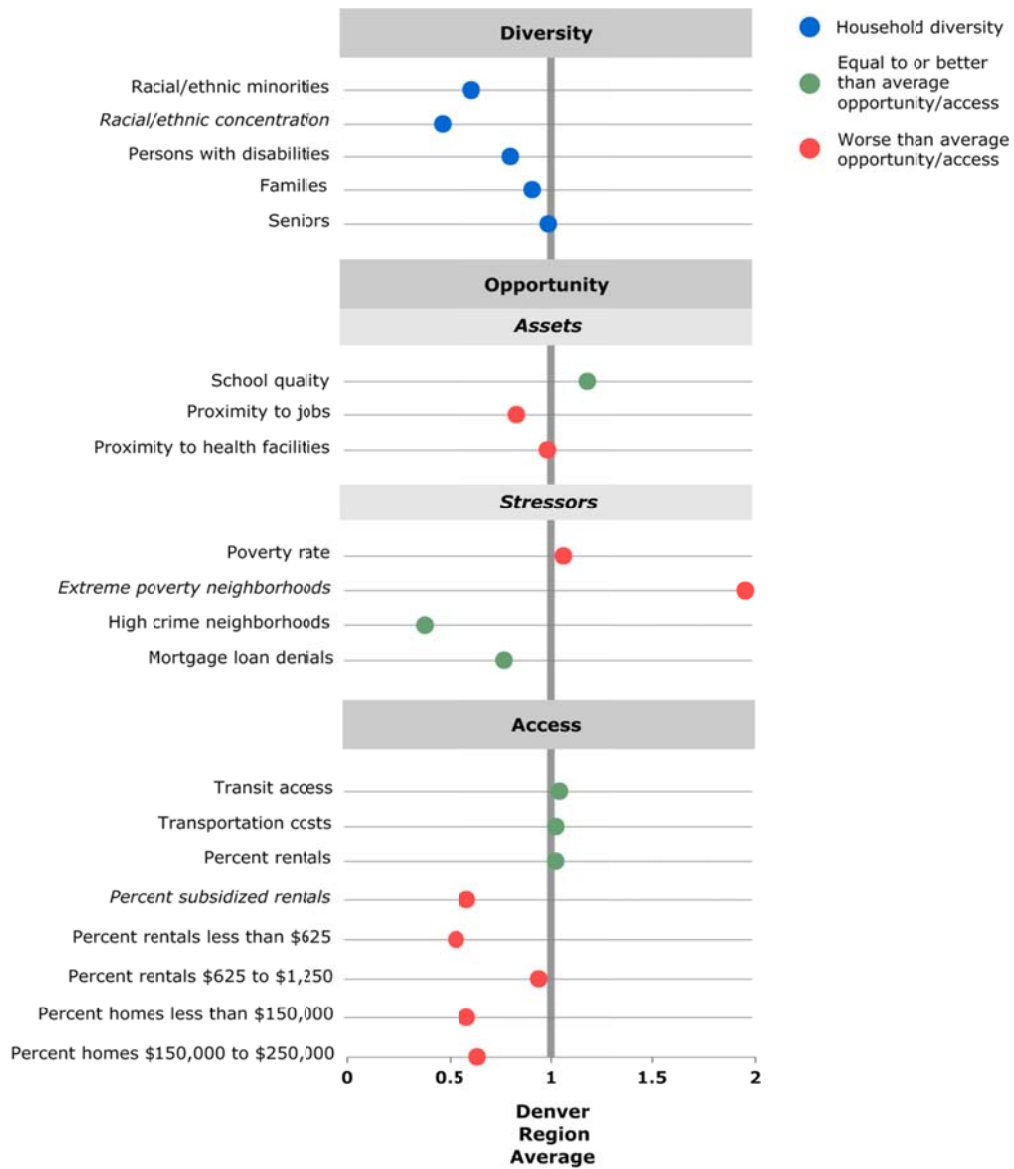
Source: BBC Research & Consulting.

Figure IV-6.
Arapahoe County Measures of Diversity, Opportunity, and Access



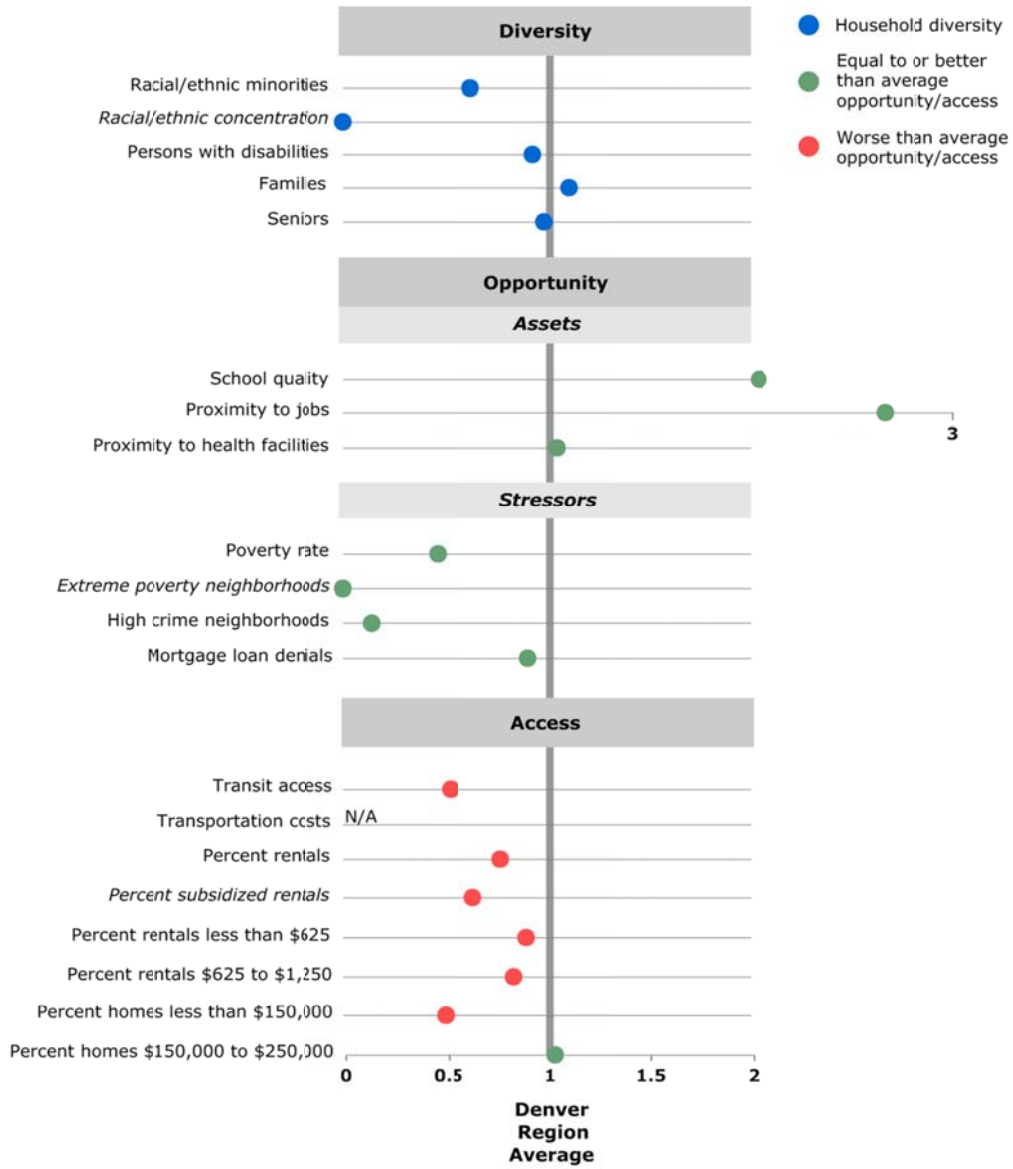
Source: BBC Research & Consulting.

Figure IV-7.
Boulder County Measures of Diversity, Opportunity, and Access



Source: BBC Research & Consulting.

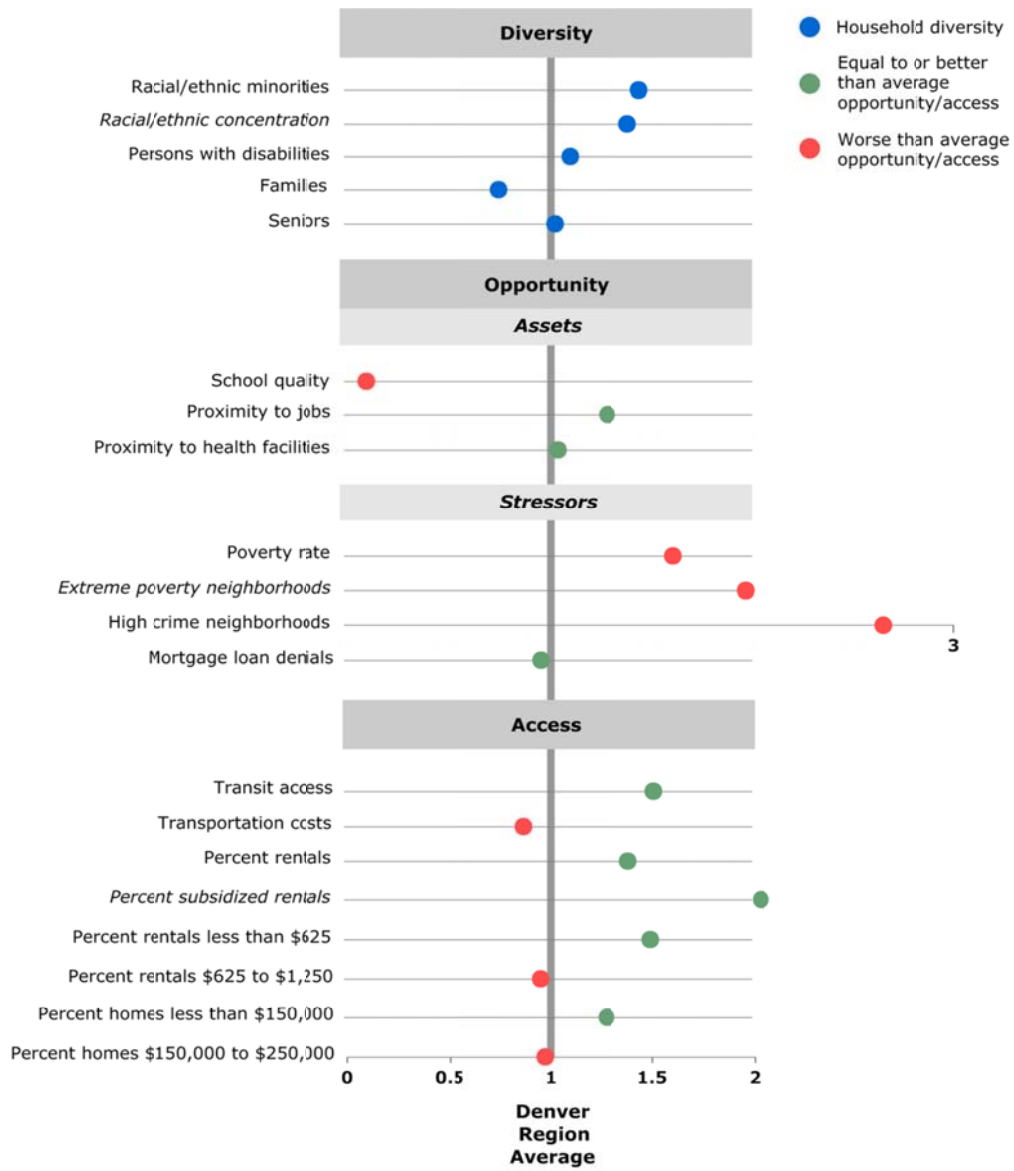
Figure IV-8.
Broomfield County Measures of Diversity, Opportunity, and Access



Note: No information was available for transportation costs for Broomfield County.

Source: BBC Research & Consulting.

Figure IV-9.
Denver County Measures of Diversity, Opportunity, and Access



Source: BBC Research & Consulting.

**Figure IV-10.
Diversity,
Opportunity, and
Access Data for All
Counties**

Note:

(1) Percents indicate share of population in 11-county DRCOG region.

(2) Living within 1/4 mile of a bus stop and/or 1/2 mile of a light rail station. Does not include Access-a-Ride.

(3) Includes Section 8 and public housing units.

Source:

BBC Research & Consulting.

	DENVER REGION	Adams County	Arapahoe County	Boulder County	Broomfield County	Denver County
Total Population, 2010	2,858,070	441,603	572,003	294,567	55,889	600,158
Total Housing Units, 2010	1,128,782	153,764	224,011	119,300	21,414	263,107
County Population as a percent of region in 2010 and 2040⁽¹⁾	100%/100%	16%/18%	20%/21%	11%/10%	2%/2%	22%/20%
Household Diversity						
Percent minority	33%	47%	37%	21%	21%	48%
Percent of minorities living in a concentrated area	49%	61%	49%	23%	0%	68%
Percentage point change in minority population (2000 to 2010)	5%	10%	11%	4%	N/A	0%
Percent with a disability	9%	9%	9%	7%	8%	10%
Percent families	62%	71%	65%	58%	69%	48%
Percent seniors	10%	8%	10%	10%	10%	10%
Indicators of Opportunity (Neighborhood Quality)						
Assets (indicators of positive opportunity)						
Percent of population in neighborhoods with high quality schools	29%	7%	28%	34%	59%	3%
Percent of population with high job accessibility index rating	24%	18%	21%	20%	63%	30%
Percent of population within 3 miles of a health facility	95%	91%	98%	95%	100%	100%
Stressors (indicators of negative opportunity)						
Poverty Rate	12%	14%	12%	13%	5%	19%
Percent of residents living in extreme poverty neighborhoods (>40%)	2%	3%	1%	3%	0%	3%
Percent of residents living in high crime neighborhoods	33%	34%	31%	13%	5%	88%
Residential capital constraints (home loan denial rate)	12%	16%	12%	9%	10%	11%
Indicators of Equitable Access (Transit and Housing)						
Percent of population with access to public transit ⁽²⁾	58%	57%	58%	62%	31%	89%
Average monthly transportation costs	\$1,108	\$1,141	\$1,103	\$1,151	N/A	\$977
Percent of housing units that are rentals	36%	34%	36%	37%	28%	50%
Percent of rentals that are subsidized ⁽³⁾	4%	3%	1%	2%	2%	7%
Percent of rentals that are <\$625 per month (affordable to HH earning <\$25,000 per year)	14%	15%	12%	8%	13%	22%
Percent of rentals between \$625 and \$1250 per month (affordable to HH earning between \$25,000 and \$50,000 per year)	59%	62%	64%	57%	50%	57%
Percent of homes valued at < \$150,000	15%	26%	17%	9%	7%	19%
Percent of homes valued between \$150,000 and \$250,000	32%	44%	36%	21%	33%	31%

Access to Quality Education

As mentioned above, the HUD school proficiency index is based on state math and reading tests administered to 4th graders. Neighborhoods are “scored” based on proficiency ratings of up to three elementary schools with a 1.5 mile boundary; aggregate scores determine the city’s or region’s overall score. This index is used as a starting point for examining access to education.

The HUD-provided index does not fully measure school quality for a number of reasons, some of which are related to the unique educational environment in Colorado: open choice, large numbers of charter and magnet schools, and limitations on district- and publicly provided transportation.

As such, this section also incorporates recent research on school quality and the drivers of educational inequities. Colorado and the Denver-Boulder regions are fortunate to have a number of organizations that specialize in researching and advising policymakers about K-12 education. Their work, and the outcomes of children attending public schools in the Regional AI jurisdictional boundaries, is discussed throughout this section.

Disparities in access to proficient schools. The State of Colorado’s Public School of Choice Law³ allows children to attend school outside of their district. This process began in the 1994-95 school year, around the time court mandated busing in Denver Public Schools (DPS) stopped. School districts have flexibility in how they implement the choice process; however, they must prioritize applicants enrolled in turnaround schools over those who are not.

School districts can deny enrollment in the districts or schools within districts based on space limitations, inability to meet a student’s special needs, eligibility requirements, and/or desegregation plans.

Disparities and school choice. In theory, school choice should equalize access to high quality schools because children of different backgrounds have the same chance of enrolling in a high quality school. However, open enrollment alone does not lead to more equitable educational environments. Open enrollment becomes less effective under the following scenarios:

- The number of “quality seats”—admission in high quality schools or specialized programs within schools—is lower than demand. Demand is created quickly, by population growth and family interest in schools and school districts. Supply is created much more slowly and can be limited by physical space in schools, inability to hire quality teachers, learning curves in implementation of curricula, and school funding. DPS’ shortage of quality seats is estimated at between 25,000 and 30,000. One of the district’s most sought after schools—DSST Green Valley Ranch—has a waitlist twice as large as the number of seats available in any given year.
- Low income families have very few options for getting their children to quality schools. This is due conflicts with work schedules, bus schedules that don’t align with school schedules

³ https://www.cde.state.co.us/sites/default/files/documents/choice/download/openenrollment_2009.pdf

(and limit participation in sports and other activities), expense of transportation, and lack of public transportation discounts for low income kids.

- Quality seats are disproportionately available in specialized or charter schools. These schools are not a universal “fit” for all children (e.g., schools for gifted children). Lower income families may not be aware of those schools, may not qualify, may not have transportation/convenient access to those schools, and/or are not sure if they belong in such an environment.
- Affordable housing near quality schools is very limited, which can lead to both travel and cultural barriers to access.

All of these barriers currently exist in some form within the jurisdictions. In DPS, quality seats are limited. Highly desirable schools are largely those with specialized programs, mostly concentrated in the northeast part of the city, where families are increasing. Aurora children can choose among many school districts (Aurora Public Schools, Cherry Creek Schools, DPS); however, the schools are spread throughout the city and are difficult to access without a car. Boulder Valley Schools offer more consistency in the educational environment but are very difficult to access due to lack of affordable housing.

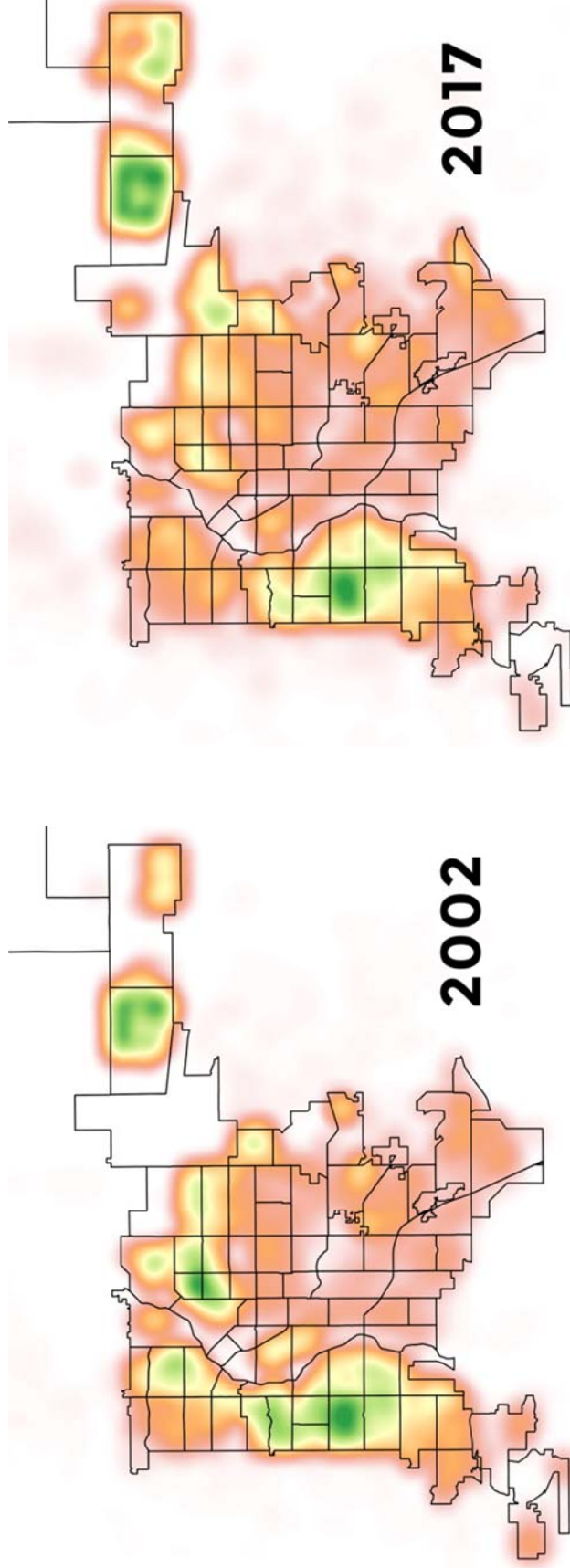
Disparities and housing affordability. Lack of housing affordability affects the numbers of families in school districts in two primary ways: 1) Low income families who rent may move to less expensive areas when rents are increasing. These areas often have schools that are under-resourced and, as such, have lower proficiency ratings; and 2) Aging residents stay in their homes longer because they cannot downsize into affordable products. This slows the turnover of homes, which may otherwise move from single or two-person to family occupancy.

As mentioned above, the primary barrier to accessing quality educational environments in the Boulder region is limited affordable housing. The dynamics in Denver and Aurora are a bit more complicated and involve disparate school quality and movement of families within and out of these cities.

DPS recently produced maps showing changes in student enrollment between 2002 and 2017, in addition to forecasts through 2021. The areas of the city with the largest concentrations of students are currently in far northeast and West Denver. This is expected to shift somewhat during the next five years: Future growth will continue to occur on the east side of Denver, in Stapleton neighborhoods southeast.

High growth areas are largely in high income neighborhoods and, other than Stapleton (which shares boundaries with Adams County and Aurora), are difficult to access from some low income neighborhoods in Denver. To the extent that space is available, low income children in Aurora may have better access to high performing schools within DPS (which are close to the East Colfax corridor) than within Aurora (high performing schools are mostly southeast). On the positive side, this improves access for Aurora families, especially those living in high poverty neighborhoods. On the negative side, that access takes those families out of Aurora schools.

Figure IV-11.
Heat Map of Where All Students Enrolled in Denver Public Schools Live, 2002 and 2017



Source: DPS, the Denverite, https://www.denverite.com/denver-family-neighborhoods-48614/?utm_source=Denverite&utm_campaign=61b60a2793-EMAIL_CAMPAIGN_2018_02_19&utm_medium=email&utm_term=0_dd2c988936-61b60a2793-139125625.

Figure IV-12.
Forecasted Change in the
Number of DPS Students,
All Grades, from 2017 to
2021.

Source:
 DPS Strategic Regional Analysis, the
 Denverite.

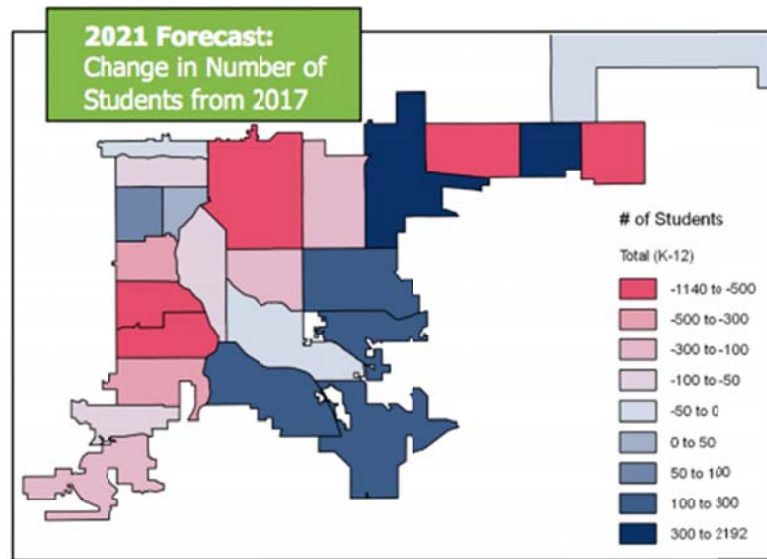


Figure IV-13.
Forecasted Change in the
Number of DPS Students
from 2017 to 2021—
Elementary Only

Source:
 DPS Strategic Regional Analysis, the
 Denverite.

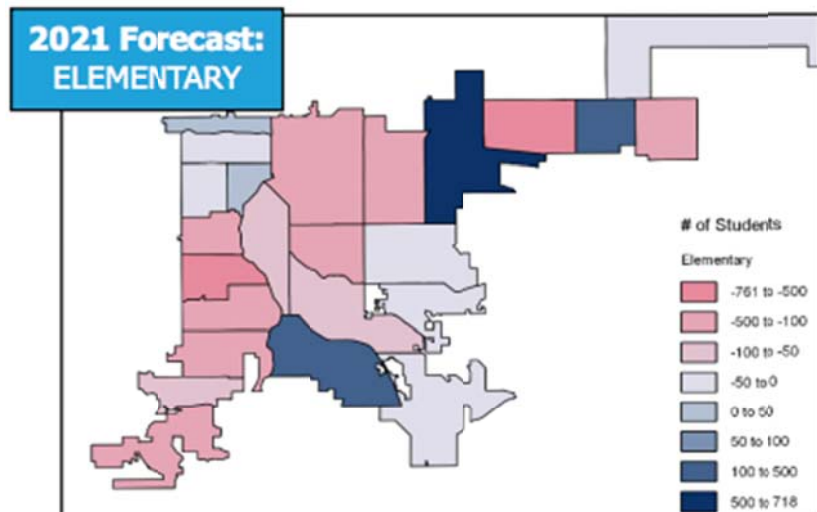


Figure IV-14.
Forecasted Change in the
Number of DPS Students
from 2017 to 2021—
Middle School Only

Source:
 DPS Strategic Regional Analysis, the
 Denverite.

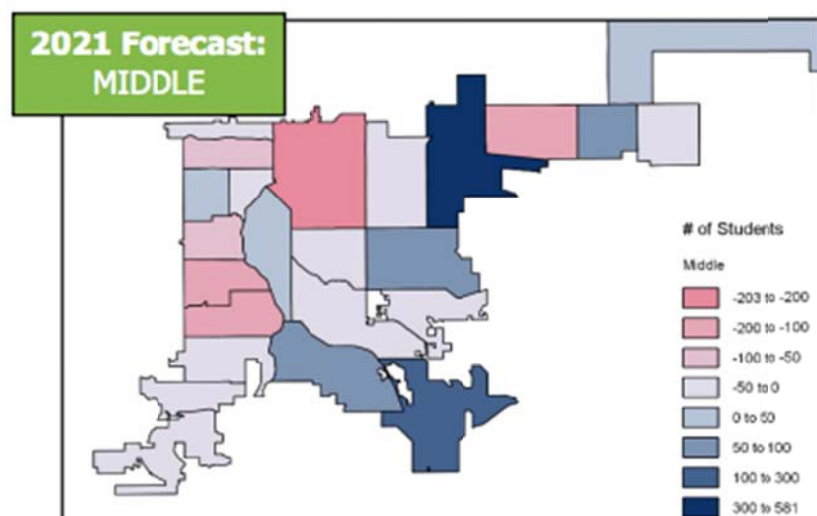
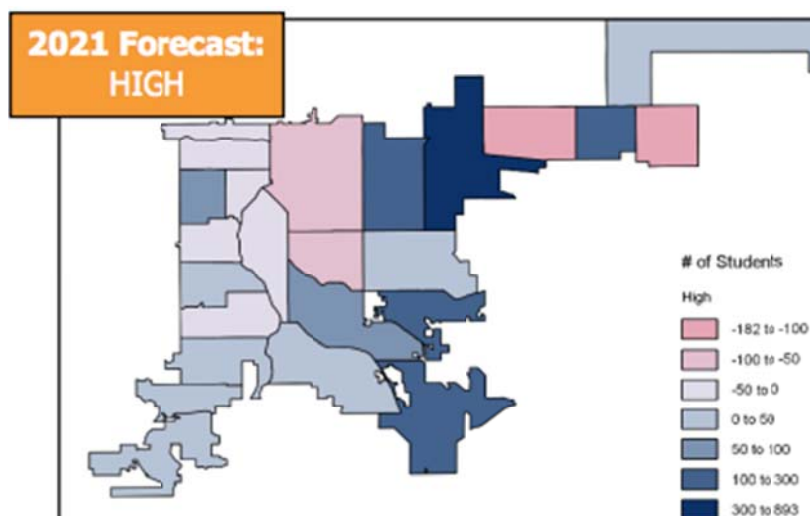


Figure IV-15.
Forecasted Change in the
Number of DPS Students
from 2017 to 2021—High
School Only

Source:
 DPS Strategic Regional Analysis, the
 Denverite.



Current and future changes in the numbers of families in Denver are also evident in school planning: DPS does not intend to add schools in the immediate future and KIPP, one of the nation’s largest charter school networks (with five schools in DPS), is considering expanding into suburban areas to ensure access to their schools by low income families.

State enrollment data support migration patterns of low income families out of Denver. As demonstrated by three year changes in Free and Reduced Lunch (FRL) children by district, low income families have declined in DPS and increased in many suburban areas. The increase is especially evident in the north metro.

Figure IV-16.
Proportion of K-12 Students Qualifying for Free and Reduced Lunch (FRL), 2014 and 2017 in
Highest FRL Districts

School District	2014	2017	Percentage Point Change
Adams 14	72%	86%	14%
Adams 12	34%	40%	6%
Sheridan	85%	90%	5%
Westminster	76%	80%	4%
Englewood	63%	66%	3%
Aurora	69%	69%	0%
Mapleton	60%	60%	0%
Jeffco	31%	31%	0%
Brighton	38%	37%	-1%
Denver	70%	67%	-3%

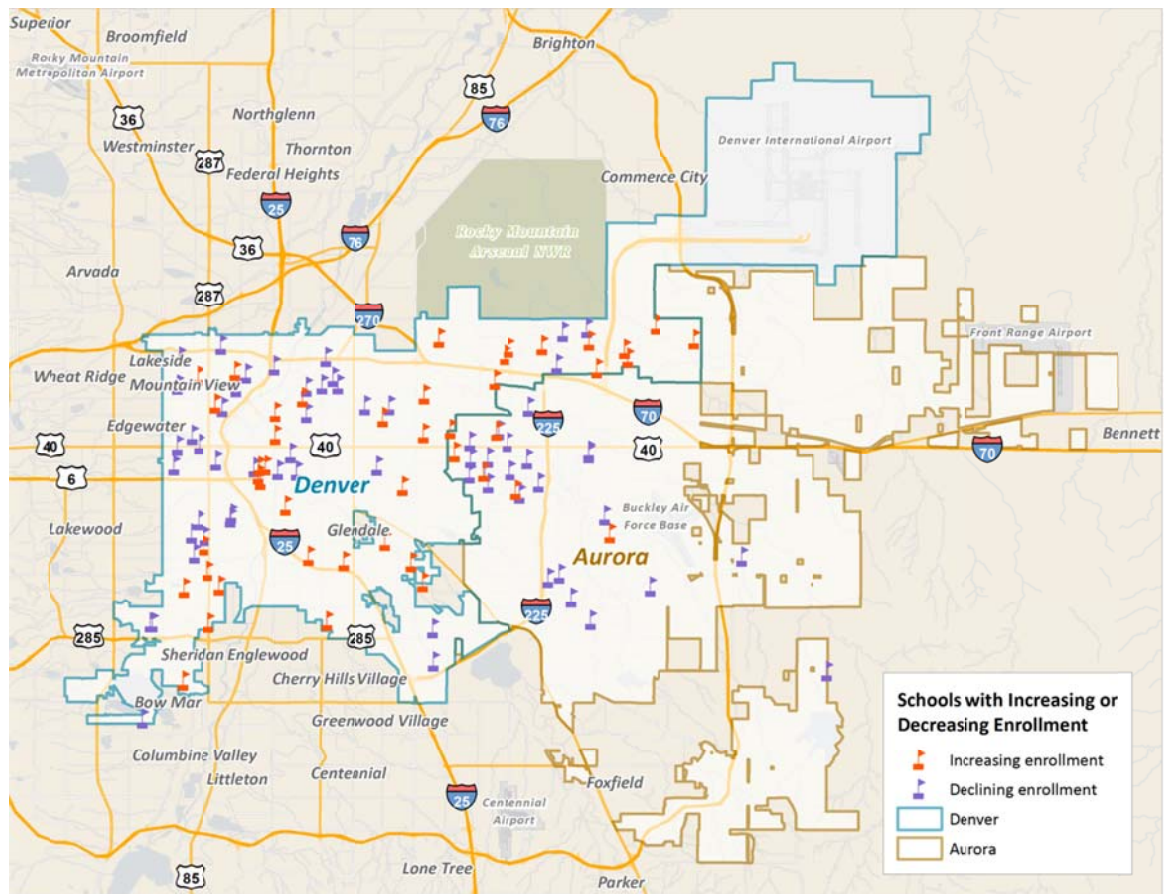
Source: Chalkbeat and Colorado Department of Education.

Custom maps on changes in enrollment in DPS and Aurora Public Schools (APS) were created for this AI and are shown below.⁴ The maps support the above data suggesting that *recent enrollment patterns have been influenced by housing supply and affordability*:

- Schools with declining enrollment in DPS are clustered in central Denver, mostly north of Colfax, and West Denver. These are also areas where housing prices have increased rapidly in recent years and neighborhoods with residents most concerned about displacement of families.
- Schools with increasing enrollment are primarily located in northeast and east Denver, and due east of I-25 (Baker/Platt Park/West Wash Park neighborhoods). These neighborhoods are in great demand and some are the most expensive in Denver. On the plus side, they border more economically diverse neighborhoods.
- The schools in Aurora with declines in enrollment are clustered east of I-225, near the East Colfax and Denver border. These schools are located in some of the highest poverty neighborhoods in the region. Students in these neighborhoods may have migrated into schools north of the Aurora border, in DPS' growing northeast quadrant, which has a large number of new, charter schools to support growth in families.

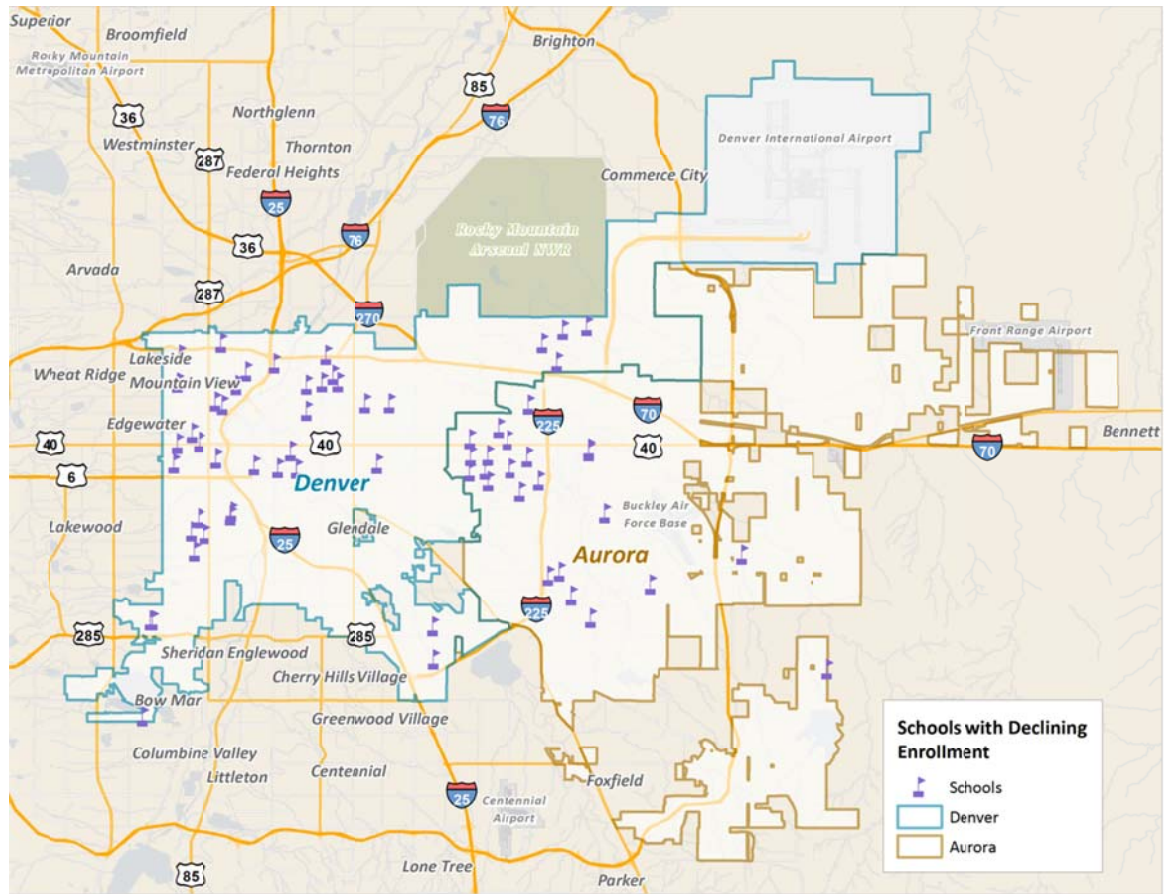
⁴These maps show enrollment increases and decreases in K-12 schools between 2013 and 2016. Online, early college, and alternative schools are excluded due to their fluctuations in enrollment.

Figure IV-17.
Schools with Increasing or Declining Enrollment, Aurora and Denver, 2013-2016



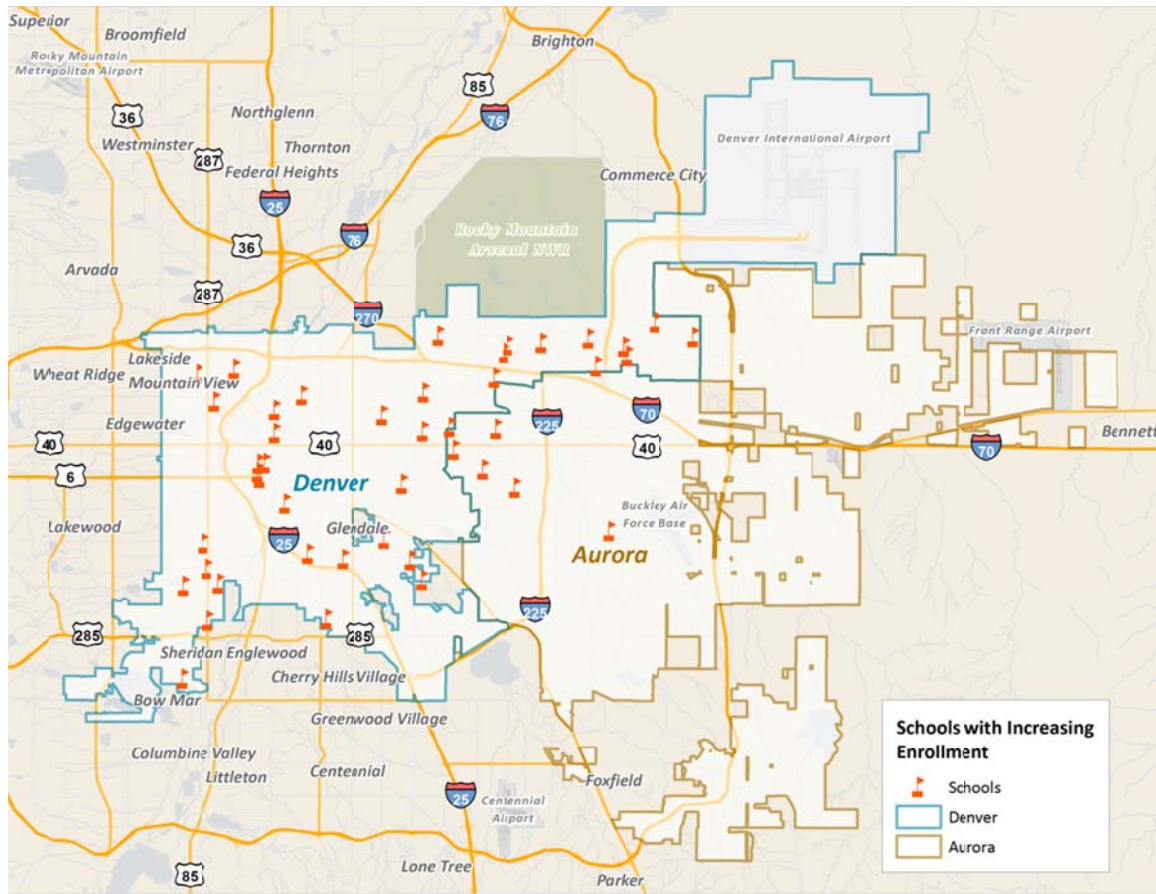
Source: Denver Public Schools, Aurora Public Schools, and BBC Research & Consulting.

Figure IV-18.
Schools with Declining Enrollment, Aurora and Denver, 2013-2016



Source: Denver Public Schools, Aurora Public Schools, and BBC Research & Consulting.

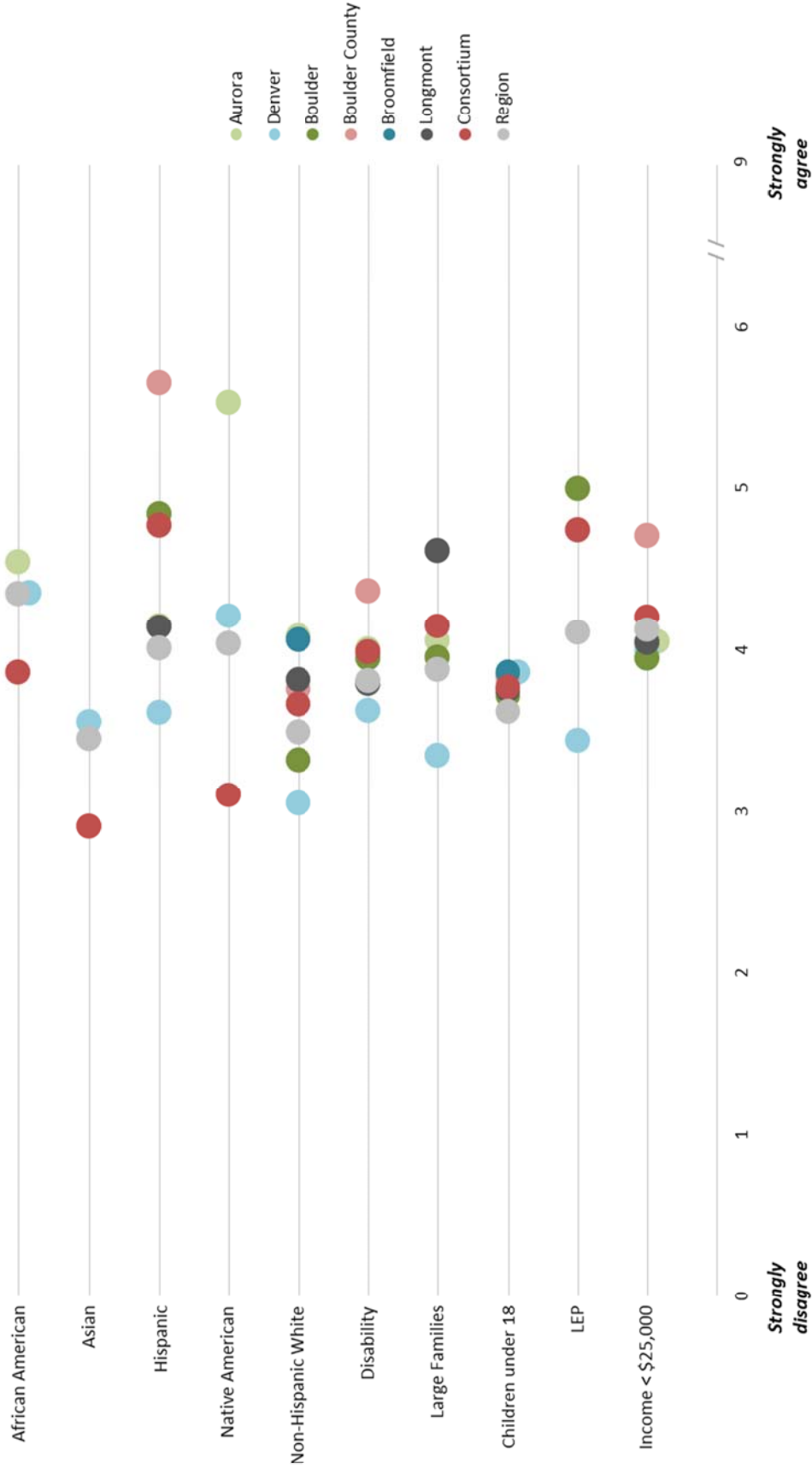
Figure IV-19.
Schools with Increasing Enrollment, Aurora and Denver, 2013-2016



Source: Denver Public Schools, Aurora Public Schools, and BBC Research & Consulting.

Respondents to the resident survey for the regional AI affirm the challenges associated with housing affordability and accessing quality schools. Figure IV-20 presents the average degree of agreement with the statement, “In this area, it is easy to find housing people can afford that is close to good schools,” by jurisdiction for members of selected protected classes and low income residents. As shown, most residents disagree that it is easy to find affordable housing near quality schools; the extent of disagreement varies both geographically and among protected class groups. Compared to other groups, Hispanics living in Boulder County and Native Americans living in Aurora are more likely to agree that it is easy to find affordable housing close to good schools. Regardless of where they live, respondents with household incomes less than \$25,000 find it difficult to find affordable housing near good schools.

Figure IV-20.
Access to Quality Schools by Jurisdiction and Selected Protected Class Characteristics and Low Income Households
In this area it is easy to find housing people can afford that is close to good quality schools.



Note: Not all groups had a sufficient number of responses to report.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Disparities related to transportation. Students of color have historically had limited access to quality schools due to segregation (of both schools and housing) and denial of economic opportunity for their parents. Although these practices are not legal today, these past actions have long-term effects.

Open enrollment helps address the gaps caused by past actions. Yet as the metro area has grown, access to quality educational environments has become increasingly compromised by transportation barriers. In DPS alone, more than 37,000 students are eligible for transportation services, up from less than 34,000 in 2013. Ridership has increased to 27,000 students, from 22,000 in 2013.⁵ An estimated 70 percent of DPS students are dropped off by car, and nearly 10 percent of DPS students travel an hour or more to access the school of their choice.

Transportation barriers are many and complex:

- DPS students are provided district buses only if they attend their home school and live a fairly long distance from their home school (one mile for elementary students, 2.5 miles for middle school students, 3.5 miles for high school studies).⁶
- Students ineligible for district-provided transportation do not receive discounts on public transportation, even if they are low income. Some schools reportedly utilize bulk sellers to acquire discounted bus passes for their students. RTD does not offer discounts currently; however, these are under consideration.
- Bus routes do not always provide good access to schools. APS students have some of the greatest barriers due to multiple RTD zones within Aurora, making transportation even more expensive and more complicated.
- Safety is another concern: Teens interviewed for this AI, especially gay, transgender, and minority teens, said they had been harassed, followed, and approached on RTD buses.
- A shortage of bus drivers has dramatically increased the cost of district-provided transportation. The national shortage of commercial licensed drivers disproportionately affects school districts, which have limited means to offer competitive salaries.

The Donnell-Kay Foundation has studied transportation challenges and how they affect educational opportunities. Recommendations that could facilitate greater access to quality schools within DPS and APS include:

- Removing a requirement that to be eligible for an RTD pass, high school students must attend the boundary schools that serve the neighborhoods where they live.
- Offering discounted bus passes to low income students (currently under consideration).
- Asking voters to approve a tax increase to fund transportation for students.

⁵ DPS BOE Work Session, October 16, 2017.

⁶ Students participating in special education, English language, and similar programs are eligible for buses.

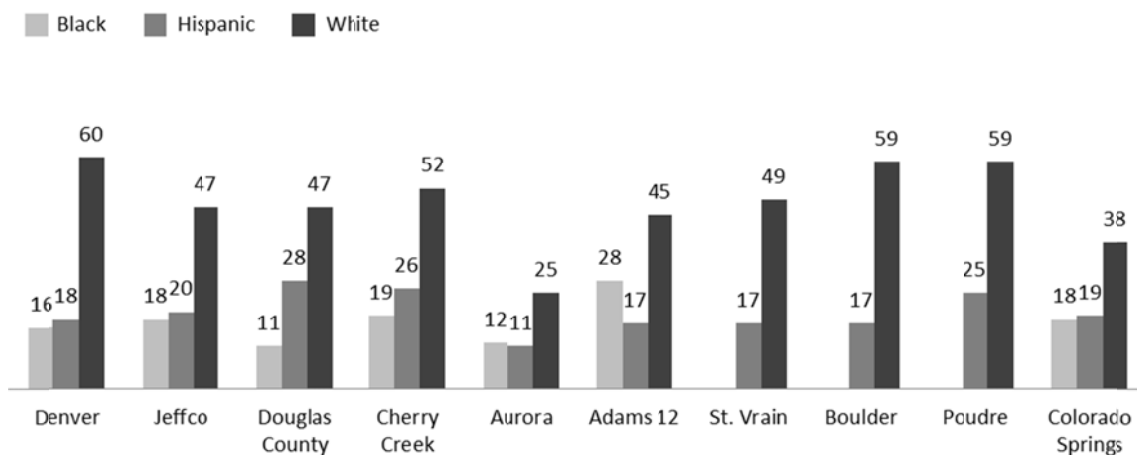
DPS has identified “increased transportation for high school students” as a focus of improving educational opportunities. The district is working with the City of Denver and RTD to broaden efforts to provide reduced-cost bus passes to students.

Disparities in access to quality education within schools. Providing access to high quality schools is one aspect of improving education outcomes of low income children. Providing access to quality programming within schools is also needed.

According to the Colorado Department of Education (CDE), the State of Colorado has some of the most educated residents in the country—and the highest gap in academic attainment between majority (White, non-Hispanic) and minority (non-White and Hispanic) students. Colorado also has one of the lowest college matriculation rates, especially for minority students. In essence, the state must import its most educated residents because it fails to produce them.

DPS and Boulder Valley Schools have some of the largest academic gaps between White, non-Hispanic students and students of color. Recent CDE data show significant differences in proficiency between students, as demonstrated below.

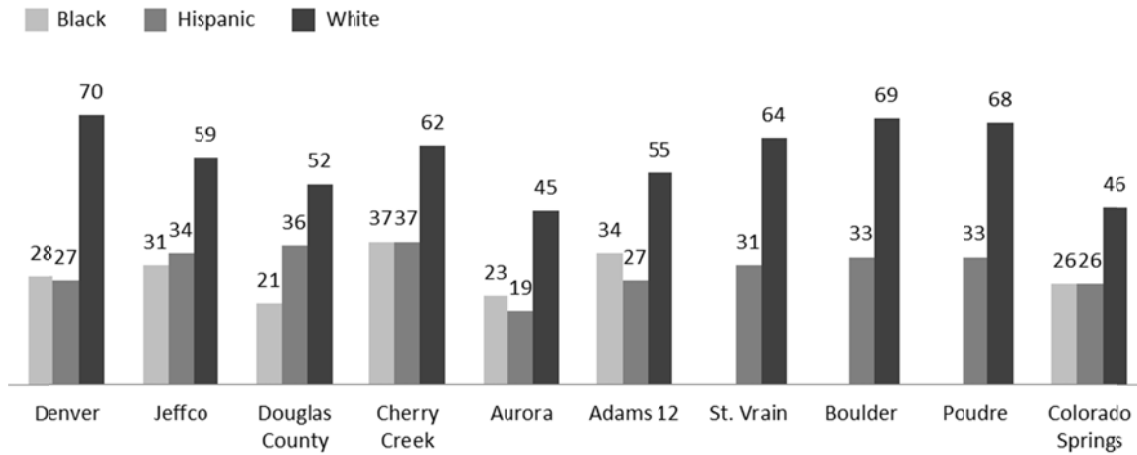
Figure IV-21.
Colorado's Academic Gap 2017, 4th Grade Math



Note: The state redacted the percentage of black students who met or exceeded expectation in some districts, such as St. Vrain, to protect student privacy.

Source: Chalkbeat and Colorado Department of Education.

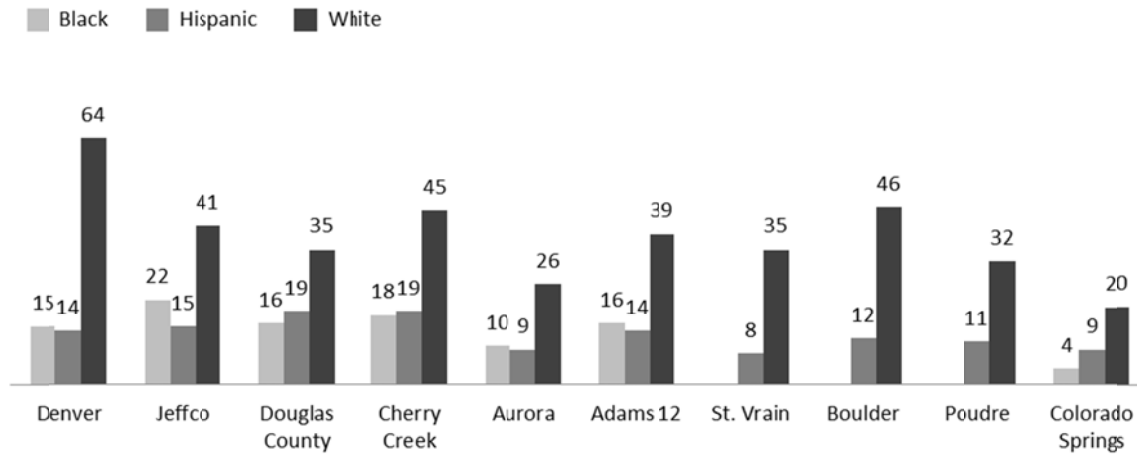
Figure IV-22.
Colorado's Academic Gap 2017, 4th Grade English



Note: The state redacted the percentage of black students who met or exceeded expectation in some districts, such as St. Vrain, to protect student privacy.

Source: Chalkbeat and Colorado Department of Education.

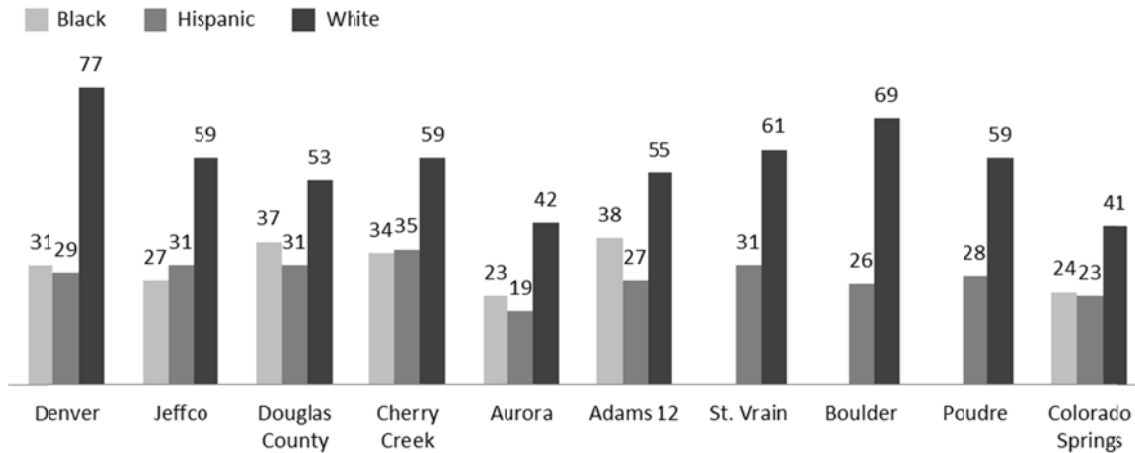
Figure IV-23.
Colorado's Academic Gap 2017, 7th Grade Math



Note: The state redacted the percentage of black students who met or exceeded expectation in some districts, such as St. Vrain, to protect student privacy.

Source: Chalkbeat and Colorado Department of Education.

Figure IV-24.
Colorado's Academic Gap 2017, 7th Grade English



Note: The state redacted the percentage of black students who met or exceeded expectation in some districts, such as St. Vrain, to protect student privacy.

Source: Chalkbeat and Colorado Department of Education.

It is important to note that all school districts have proficiency gaps among White, non-Hispanic students and students of color. DPS is unique in that its gap is largely due to the relatively high performance of White students relative to students of color, and compared to students in all districts.

Although gaps still exist, African American students are making significant gains in achievement. According to the Bailey Report, which DPS commissioned to collect qualitative data on educational barriers to African American students:

- African American students' graduation rates are on an upward trend (43% in 2007 v. 63% in 2014);
- In 2015, African American students passed four times as many AP examines as in 2006;
- DPS middle school African Americans have shown significant gains in proficiency rates in math and outpaced their peers statewide;
- Suspensions within DPS have been reduced by a factor of 4. That said, African American boys are still more likely to be suspended than their White counterparts.

Challenges in addressing the gaps in education for African American students remain for all districts. These challenges are also prevalent for many students of color. In particular,

- Students of color are perceived as having negative dispositions, especially by White teachers;
- Content and programming of new, charter schools often does not meet the needs of a diverse student body. In particular, the heritage and culture of all students should be included in curriculum;

- All districts lack qualified, diverse, culturally competent teachers who can serve as role models for students of color; and
- Students of color may have lower expectations than White students. This “deficit thinking” perpetuates educational gaps.

Challenges faced by LGBTQ residents. A focus group was conducted with teens:

- The teens had a lot to say about their school experiences. All but one had dropped traditional school for home schooling.
- They did not feel safe using their birth gender bathroom and, although schools are required to provide a gender neutral bathroom, most said these were locked (and they had to ask a counselor or teacher to open it, which was embarrassing) or in a location that made it difficult to access in between classes. Some required a parent form for the bathroom, which requires “outing” to parents and may not feel safe.
- Most teens described being bullied by students because of their transgender or neutral gender presentation. This occurred at many schools (East, Hamilton, Hill, Montbello, Macauliffe). A teen who attended Montbello hid during lunch and after school so she would not get assaulted. She finally defended herself and was suspended.
- For many teens, having just one teacher or counselor at the school who understood their situation helped them feel safe and sustain some self esteem.
- Gay Straight Alliance (GSA) clubs need to have a sponsor to be started and this sponsor must be an adult. Some schools require a teacher be a sponsor and present at the club. This is not always true of other clubs and feels discriminatory. A school in Parker reportedly cancelled all clubs to avoid allowing a GSA altogether.

Reasons for disparities. Disparities in education in the Denver Aurora Boulder region are due to many factors, many of which have been discussed above. The most prominent barriers include:

Historical patterns of segregation. Efforts to desegregate urban schools in the mid-1970s through mandated busing had perverse effects in the Denver region. Many families left DPS or sent their children to private schools. These actions had two negative effects: 1) They took students and resources out of DPS; and 2) Promulgated the idea that suburban schools were superior to urban schools, perpetuating the settlement patterns that began with intentional segregation.

Limitations on educational funding have contributed to financial disparities and quality (perceived and real) among schools. Schools in high income areas generate significant resources through parent-teacher associations; these funds are used to support paraprofessionals, after school activities, and enrichment programs.

Lack of affordable housing is increasingly a barrier, as discussed in the section above. Until recently, this was mostly confined to the Boulder region; families in Denver and Aurora could find relatively affordable housing near quality schools. The significant increase in housing costs is making it more

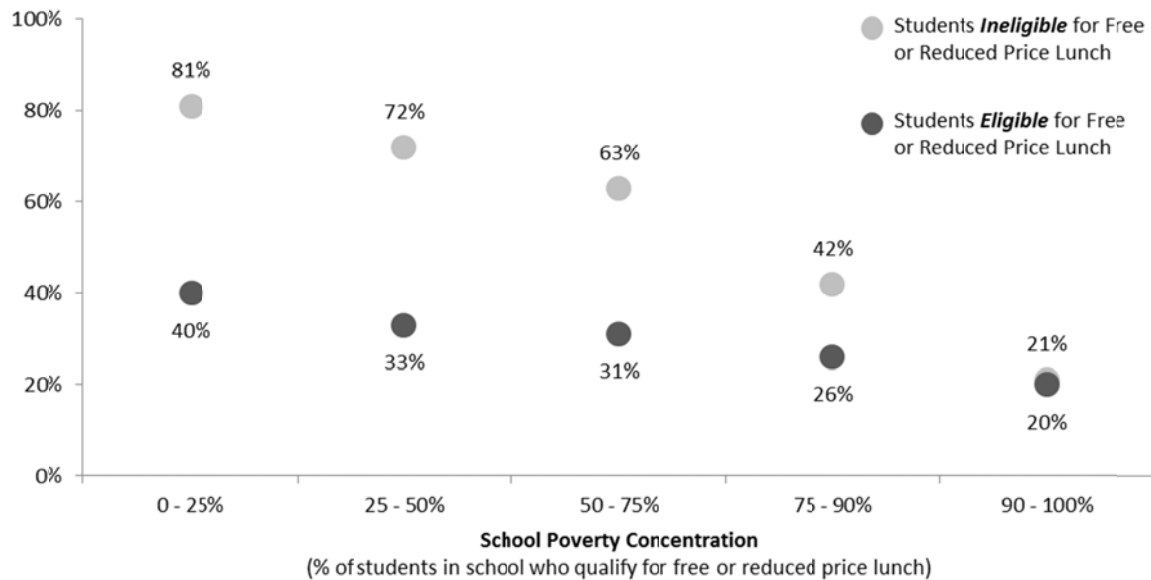
difficult for all but wealthy families to live near quality schools. This can be exacerbated by neighborhood resistance to affordable housing, which often centers on misinformation about how economic integration affects public schools (discussed below).

Limited transportation. Open choice only works if students can access choice schools. A 2017 analysis of how high school students access DPS schools showed that FRL high school students are much more likely to rely on DPS buses and RTD to access high schools of choice than non-FRL students, who are more likely to walk to school. These students have similar uses of open enrollment options. The data demonstrate that affordable public transportation is critical for low income children to access quality high school choice environments.

Myths about integration. Research shows that children living in low-poverty schools do better in high quality schools, regardless of their income status. Yet few parents choosing schools are aware of this.

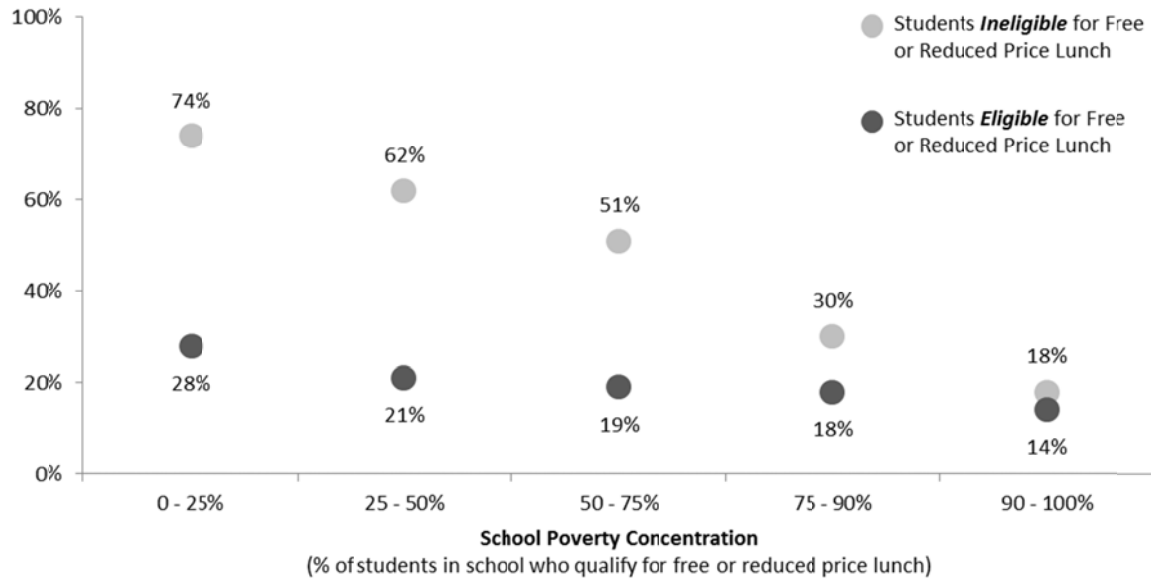
As the figures below show (from a study of DPS data), performance on English Language Arts (ELA) and math test scores improves with a reduction in concentrated poverty. This is true for children above- and below the poverty line (measured by Free and Reduced Lunch status).

Figure IV-25a.
Percent of DPS Students that Met or Exceeded Expectations - English Language Arts (CMAS 2017)



Source: A+ Colorado and 2017 Colorado Measures of Academic Success (CMAS) data. <http://apluscolorado.org/wp-content/uploads/2018/02/A-Colorado-Learn-Together-Live-Together-4.pdf?ref=2879>.

Figure IV-25b.
Percent of DPS Students that Met or Exceeded Expectations - Math (CMAS 2017)



Source: A+ Colorado and 2017 Colorado Measures of Academic Success (CMAS) data. <http://apluscolorado.org/wp-content/uploads/2018/02/A-Colorado-Learn-Together-Live-Together-4.pdf?ref=2879>.

More than 23,000 children in Denver alone attend schools with concentrated poverty and would benefit from more integrated environments. This is a significant number of future workers in the region whose human capital could be enhanced by stronger educational opportunities.

Inadequacy of feeder schools and programs. The education a student receives in elementary school prepares them for success—or failure—in middle school, high school, and post-secondary education and training. When students cannot access quality learning environments in their early school years (including preschool, as discussed below), they are less equipped to participate in middle and high school classes and programs that help them get accepted into college or technical schools, receive scholarships, attain college or technical degrees, and become active participants in the labor force.

Lack of access to and expense of pre K-12 education. Access to early childhood education (ECE) is another critical component of success in K-12 years. Quality ECE has been linked to higher school performance, as well as higher adult earnings and lower juvenile delinquency and criminal activity.

Shift Research Lab, a program of the Piton Foundation, recently completed a mapping project that examines several facets of ECE Accessibility (see <http://www.shiftresearchlab.org/project/early-care-education-map>).

Relevant findings from the ECE Accessibility project include:

- Licensed care is most easily accessed in high income communities, including Boulder, Broomfield, and several South Metro suburban communities (Littleton, Parker). These are also some of the least affordable communities in the region.

- Most licensed programs in Denver and Aurora have moderate to high care ratings. Highest rated facilities are found in the periphery of the Denver metro area (in both affordable and unaffordable areas) and in Boulder.
- The neighborhoods with the highest proportions of teenage births are located east of Boulder, south of Longmont, and in Aurora, West Denver/east Lakewood, and Commerce City. These areas have good access to quality care.
- The project does not account for the cost of care, other than to show where facilities that accept state subsidies are located. Most are located outside of Denver, however, away from employment centers and publicly subsidized housing.

Self-perpetuating nature of barriers. Educational gaps are stubbornly persistent largely due to the self-perpetuating nature of economic barriers. Families with resources seek out quality educational environments because they can afford to buy homes near quality schools. Better schools have better teachers because teachers gravitate to areas to where the “easier” students are located. Parents with more resources can offer schools support (financial and through volunteer work), which is critical in a state that underfunds education. All of these factors help to widen the gaps in educational quality and student proficiency.

Addressing barriers. Initiatives that are most important to close educational gaps and which should be embraced by school districts throughout the region—and supported by jurisdictional leaders—include:

- **View education as an economic development investment.** Providing access to lower poverty schools for low income children is imperative if the state and city desires to grow human capital from within. Education must be perceived as a long term investment, not an annual expense. This reality needs to be communicated to parents in all districts, to address myths about student integration.
- **Create intentional open choice.** DPS, at the recommendation of its Strengthening Neighborhoods Committee, is exploring how to create high quality, integrated schools through goal setting; priority enrollment of underrepresented students in high proficiency schools; and enrollment zones that are intentionally diverse. The effect of this effort would be magnified by a regional approach to remedy the unintended effects of open enrollment and use of charter schools.
- **Begin quality education in preschool—and create quality feeder elementary schools.** All children benefit from high quality early learning environments. If children of low income families—who have fewer resources—are to be prepared to access challenging classes (AP, honors) in middle and high school, they must have the same access to quality early learning as their higher income counterparts. ECE and elementary schools must produce prepared students, regardless of their backgrounds.
- **Recognize the importance of public transportation.** Helping students exercise school choice should be a centerpiece of transportation planning. RTD must internalize the role it plays in facilitating the state’s open enrollment law and addressing educational gaps.

- **Incorporate access to quality education into other types of community planning.** Education, housing, land use, and transportation planning typically occur as “silo-ed” processes. And these silos extend to regional planning. All community planning efforts should be viewed in the context of equity—especially in education, where increasing equity begins.

Access to Employment

For many years, the Boulder Broomfield region has been an attractive place for businesses and workers. The area’s well educated workforce, close proximity to a major university, high quality of life, and access to natural amenities has made it popular with employers, particularly those fleeing higher cost areas.

The Denver region is now equally as desirable and, according to the Denver Mayor’s office, since the end of the Great Recession, has seen a growth of 75,000 jobs and the addition of 3,700 new companies.

This is good news for the region overall. And, data from the Economic Policy Institute, which recently analyzed state unemployment in 2017 by race and ethnicity, suggest that the economic strength in the region has benefitted all residents. EPI has found little difference in unemployment rates for White, non-Hispanic, Hispanic, or Asian residents (data were not available for African American workers).

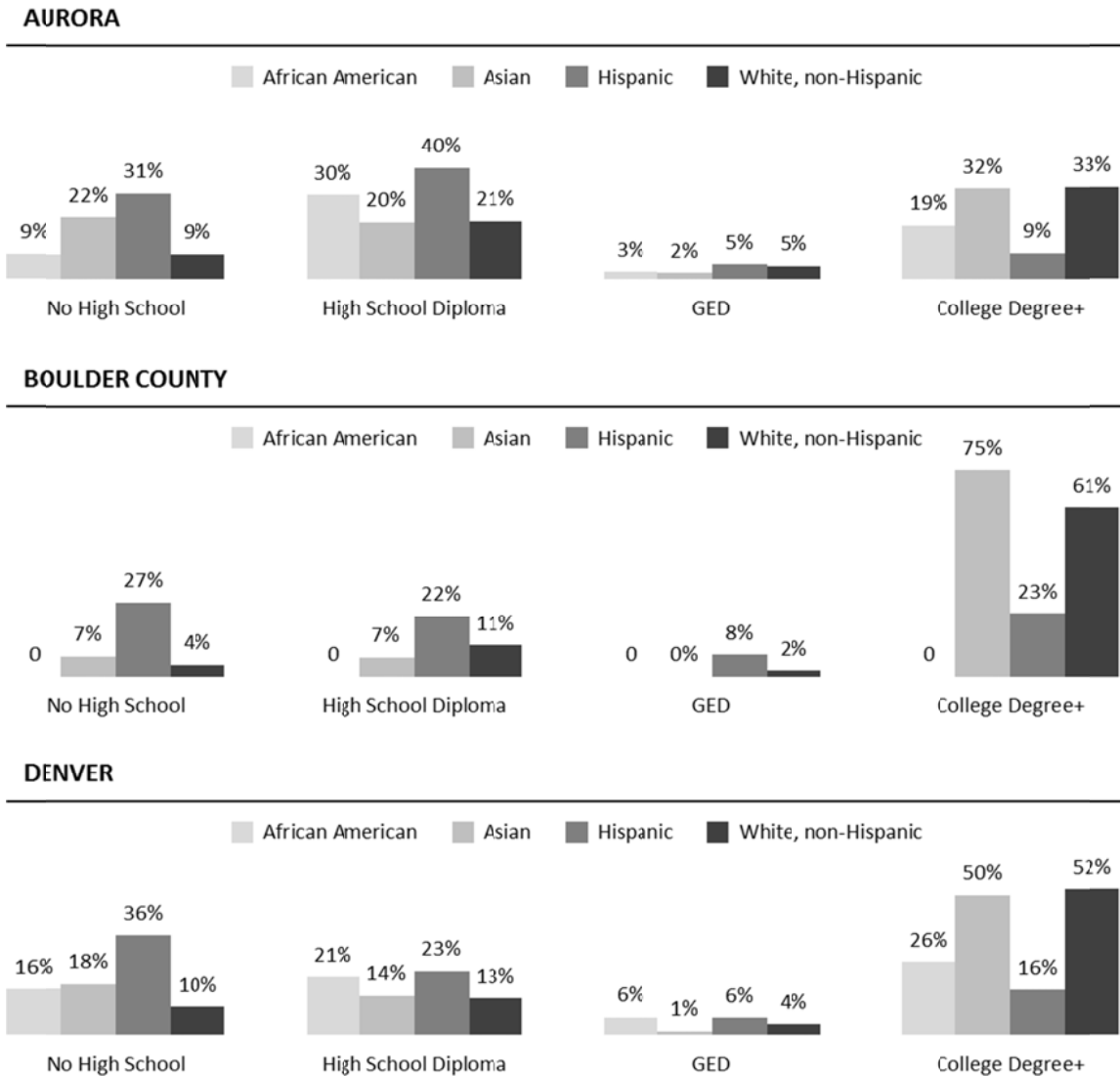
Yet unemployment is only one indicator of how well workers are doing. Data on educational attainment, shown in the figure below, suggest that White and Asian workers, who have the highest rates of college graduation, are more likely to benefit from economic growth in a Denver-Boulder regional market, where jobs with college and professional degrees are highly valued.⁷ The data also show sharp disparities in attainment for Hispanic residents and, to a slightly lesser extent, African Americans.

And, the data demonstrate how college degrees are linked to residential settlement patterns: Aurora is more likely to house workers without college degrees, who typically earn lower wages.

Persons with disabilities have even more challenges finding employment that needs their needs, especially in a competitive market. One attendee said his doctor recommends that he only work 2-3 hours per week. He wondered how he would ever find an employer who could accommodate this type of schedule.

⁷ GED certifications are shown separately. Research has shown that workers with GEDs are underpaid relative to their counterparts with high school diplomas. The employment market favors a diploma over a GED. This creates differences in opportunities for some residents—e.g., teen mothers, who may need to drop out of high school and obtain a GED instead of a diploma.

Figure IV-26.
Educational Attainment by Race, Ethnicity and Jurisdiction, 2016



Note: Percentages do not add to 100% because "some college" is excluded. Data are only available for the jurisdictions shown above.
 Source: 1-year American Community Survey, 2016.

The above figure reiterates the importance of K-12 education in providing equitable opportunity for all types of residents.

A 2013 equity assessment completed as part of a regional housing strategy for DRCOG examined the difference between a county's share of the region's job training centers and that county's share of adults with less than a high school degree. This exercise asked if training centers are located in the areas of greatest need. Outcomes from that analysis appear below.

The data show that Denver has high proportion of job training resources relative to its population with less than a high school degree. Conversely, Adams County has a substantial undersupply of job training centers given its relatively high share of the adult population that is likely to need such

resources. The figure also shows how rapidly unemployment has changed. In the past 5 years, the rate dropped by more than 50 percent, to less than 3 percent today.

Figure IV-27.
Educational Attainment, Unemployment and Job Training Centers, Denver Region, 2012

	Number of Job Training Centers (JTC)	Percent of Adults with Less than a High School Degree (LTHS)	Unemployment Rate	Distribution Comparison		
				County Share of Region's JTCs	County Share of Region's Adults with LTHS	Percentage Point Difference
DENVER REGION	90	10%	7.7%	100%	100%	0%
Adams County	7	19%	9.2%	8%	27%	-19%
Arapahoe County	12	9%	7.8%	13%	17%	-4%
Boulder County	0	6%	6.1%	0%	6%	-6%
Broomfield County	0	5%	7.1%	0%	1%	-1%
Denver County	53	15%	8.5%	59%	32%	27%

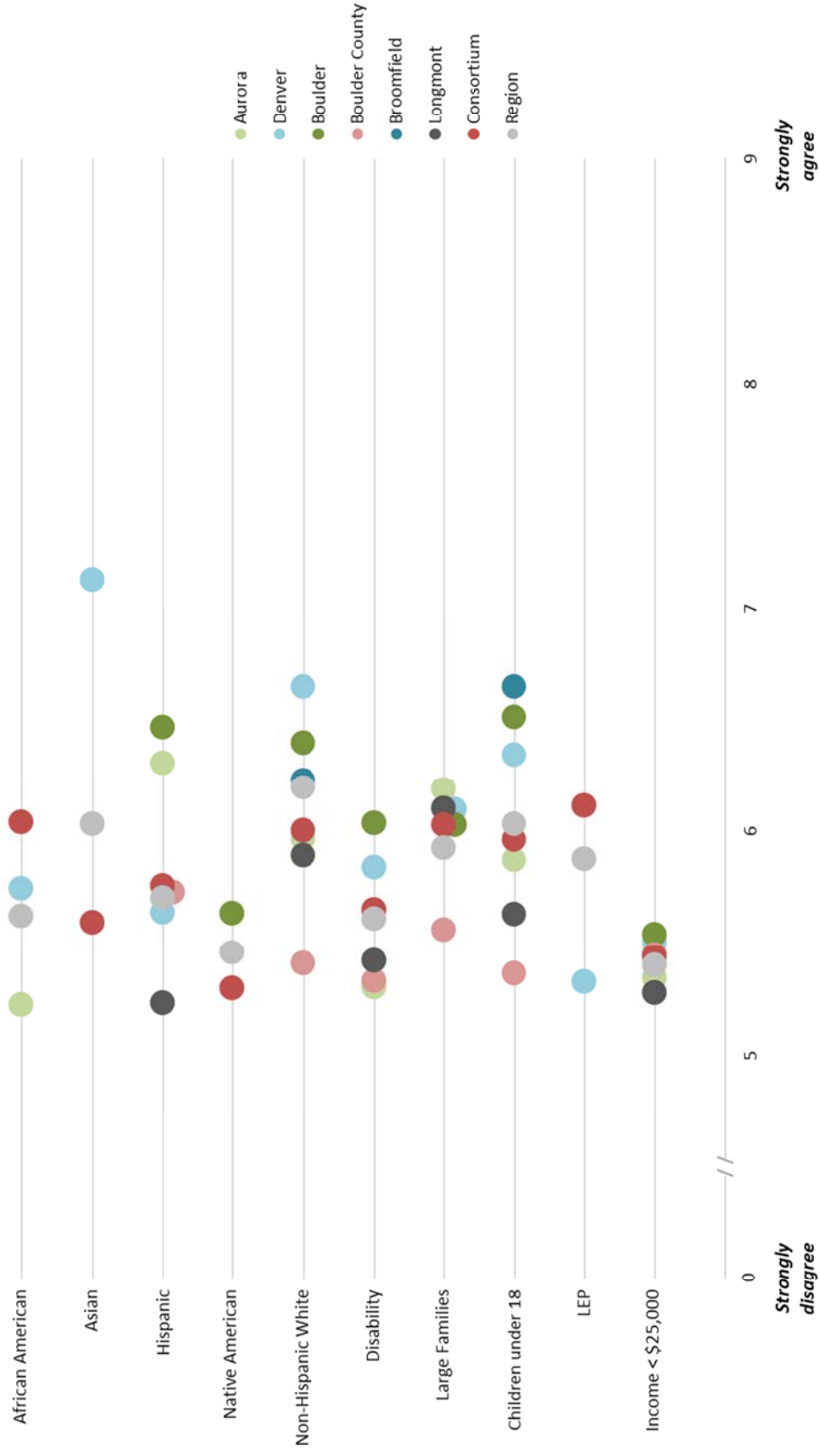
Source: Colorado Department of Labor and Employment, 2008-2012 ACS, the Bureau of Labor Statistics, BBC Research & Consulting and DRCOG.

Two survey questions directly addressed the linkage between employment and housing. One, in the context of housing challenges, asked if there were “not enough job opportunities in the area.” Overall, less than one in 10 respondents in the region (7%) identified “not enough job opportunities in the area” as a challenge; this proportion is similar across all of the participating jurisdictions. This rate does vary demographically.

- Native American residents (15%), Asian residents (13%), African American residents (12%), Hispanic residents (12%), households that include a member with a disability (11%), large families (11%), households with incomes less than \$25,000 (10%), are *more* likely to have this challenge than the average regional resident;
- LEP residents (5%) are *less* likely to experience this challenge

To understand the linkage between access to employment and housing, survey respondents rated their level of agreement with the statement, “The location of job opportunities is convenient to where I live.” Figure IV-28 presents this data by jurisdiction for members of selected protected classes and low income residents. As shown most residents, on average, somewhat agree that job locations are close to where they live. For African Americans, this is lowest in Aurora and highest in the Consortium communities. Proximity of jobs to home is lowest for Hispanics living in Longmont and highest for Boulder Hispanics. There is little variation by community for households with incomes less than \$25,000.

Figure IV-28. Access to Employment, by Jurisdiction and Selected Protected Class Characteristics and Low Income Households
The location of job opportunities is convenient to where I live.



Note: Not all groups had a sufficient number of responses to report.
 Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Employment and training and educational professionals participating in focus identified the following barriers to employment:

- Transportation challenges are a significant barrier to sustainable employment. Reliable and affordable transportation is essential, not only to help under-employed workers access job training, but also for employees to get to work. Bus passes are expensive. Light rail is cost prohibitive for most service and retail workers and others at or just above minimum wage.
- Benefits cliffs limit growth in human capital and create dependency. Residents who need SNAP or TANF get it taken away when they start to earn one penny over the limit. For these residents, particularly those living in Section 8 or other voucher-supported housing, the overnight loss of SNAP and TANF creates an incentive to quit their job or not accept promotions or raises.
- There is a significant need for retraining workers in their 50s and older who have worked labor intensive jobs (e.g., housekeeping) and can no longer perform those jobs. These are people who have always worked and want to work but do not have the skills to perform any other type of work. Their needs are exacerbated by ESL needs. Several residents participating in the Spanish-speaking focus groups were former painters, hair dressers, housekeepers and could not work these jobs because of health declines. They are qualified by supervise staff; however, their lack of English language mastery limits those opportunities.
- Persons transitioning out of or currently experiencing homelessness need case managers and support in the job search. Being rejected from employment or training programs due to charges that stemmed from their addiction or mental illness or associated with their homelessness fosters hopelessness and perpetuates their current state.
- Statewide and regionally, a lack of coordination and cooperation among service providers, funders and government agencies creates a barrier to connecting residents with services they need. Funds may become available to provide a program or service, but nonprofits do not have the capacity to grow to house programs or deliver these services. The system is fragmented. Duplication of services is also a problem. In sum, there is an inefficient delivery of job training and employment attainment programs.
- Employers in the region are not connecting housing needs to sustainable employment .This conversation needs to be facilitated by city staff; employers must be brought on board to be part of the solution. *“A lack of affordable workforce housing is the number one issue in Boulder and Boulder County and this need runs against some of our most favored policies—the open space that surrounds our community and our height restrictions.”*

Residents who discussed employment barriers in focus groups described a market that favors younger workers who speak English. Most attendees were quick to describe their skills and have a desire to work. They simply don't know where to start.

Older workers want to work but cannot find employment due to health issues. For example,

- One attendee was a painter for 40 years. He can no longer paint because of knee problems, but he could supervise others.
- One woman said she couldn't enroll in the Emily Griffith Technical College because she does not have a Social Security Number.
- One woman developed eye cancer and was in rehabilitation. She lost her job and can't find another one.

Teenagers who participated in focus groups all expressed a desire to work but had trouble finding or accessing a job. *"We can't afford a car and I don't feel safe riding the 15 by myself at night."*

- One attendee said that the jobs that teens used to have are now taken by adults as a result of the influx of residents in the area (some who move without jobs).
- The teens were very concerned about finding jobs and accessing educational opportunities that will allow them to earn living wages.

Transportation Access

Transportation was identified as the second most serious barrier (after housing) to access to opportunity by stakeholders and residents interviewed in this study.

Stakeholders expressed frustration about the region's limitations in moving workers to jobs and students to choice schools. The exception was the Boulder-Longmont area, which is perceived to have a well-functioning, variety of transportation alternatives. Many stakeholders and residents feel that investments in transit have favored higher-income, downtown professional workers (typical light rail users)—while penalizing lower income, low wage workers and students who ride the bus and have seen routes reduced.

Transportation is a significant issue for residents. Challenges with transportation consumed a large part of the discussion. Concerns expressed by focus group participants included:

- Attendees feel that bus lines are getting cut to support light rail, which has a discriminatory effect. The rail is not accessible for them (across I-70), nor does it go where they need to go. The 42 was given as an example—it used to run every 15 minutes, then 30 minutes, and now, only every hour.
- Buses and bus stops do not feel safe, especially for children. The 15L was given as an example of an unsafe bus: "always full of people and some are smoking." One woman said a man had touched her son on the bus (in an inappropriate way) and the 15L bus driver intervened and helped. "It was good that he [the bus driver] spoke Spanish and had a phone."

- A senior with a disability living in Montbello (amputee) said it takes her 3 hours each way to get to Denver Health. She rides three buses each way.
- Several residents had called Access a Ride and were told they couldn't be served because they spoke English and were therefore not U.S. citizens and "we can't provide transportation to you because that would be illegal." Others had made an appointment and did not have the shuttle come.
- Some residents felt that bus drivers did not treat them the same as other riders; the perceived bus drivers as favoring African American riders. Some said buses will not stop to pick them up.
- One mother said it is very challenging for her to get her children to appointments. She does not have a car and the bus is unpredictable.
- One resident said RTD is "arrogant and very rude."

Resident survey respondents rated their satisfaction with their transportation situation on a scale from 0-9 where 0="extremely unsatisfied" and 9="extremely satisfied." Average satisfaction with transportation among respondents is 6.5, more satisfied than not. Among the jurisdictions, resident satisfaction with their transportation situation ranged from 6.3 among Denver and Boulder County residents to 6.8 among Aurora residents. Native American residents have lower satisfaction with their transportation situation than other racial or ethnic groups.

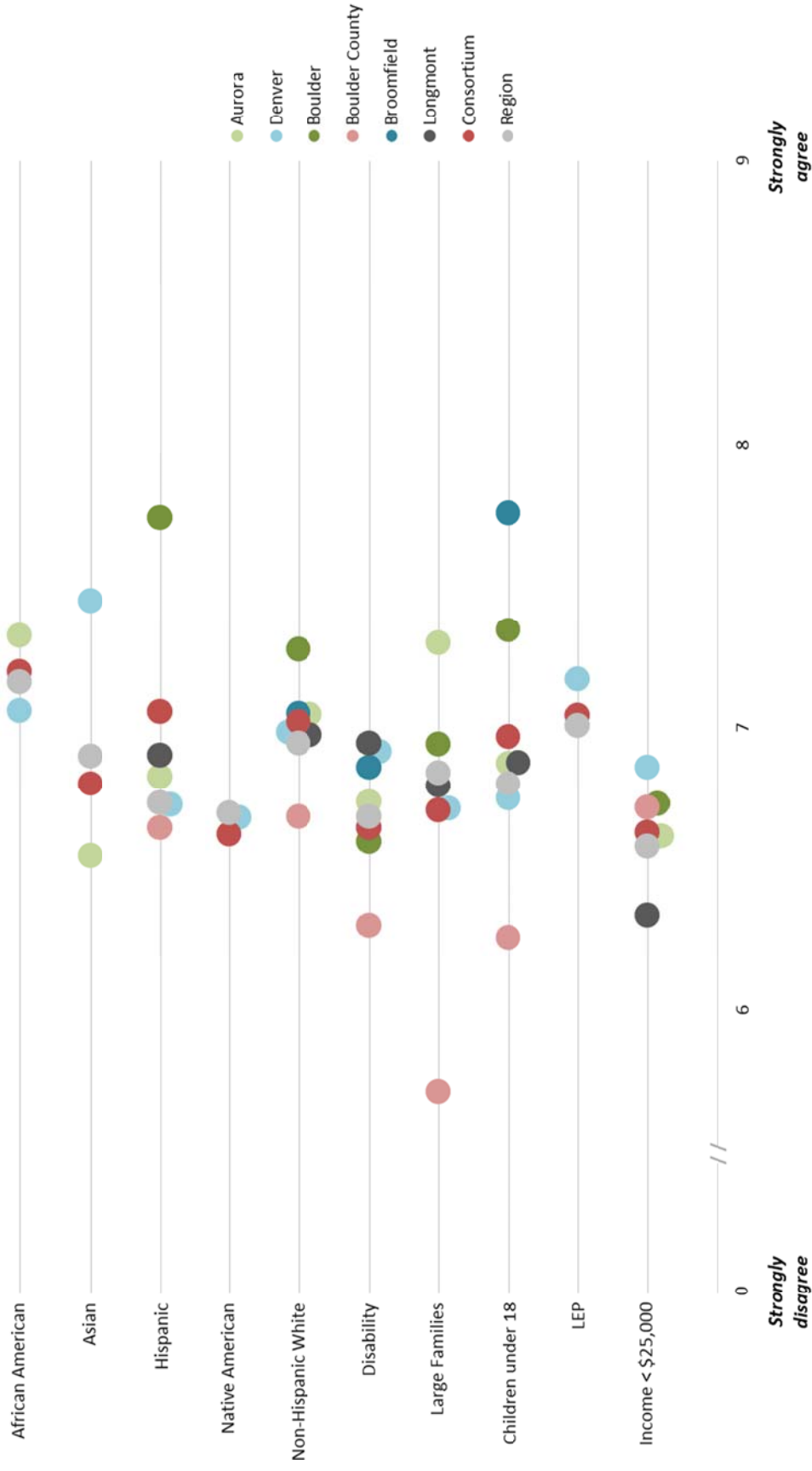
Not surprisingly, satisfaction with transportation situation varied by the type of transportation used most often. Regionally, residents who drive their own vehicle are somewhat more satisfied than those who rely on public transit. Paratransit users are least satisfied.

Average satisfaction with their transportation situation among public transit users is similar to transportation satisfaction overall (6.2 versus 6.5). Boulder transit users had the highest satisfaction (6.8) and Longmont the lowest (5.5). Compared to the regional average, Native American (5.6), African American (5.7), Asian (5.7), and disability (5.8) transit users had lower average satisfaction.

Too few paratransit users from jurisdictions other than Denver participated in the survey to draw comparisons.

Figure IV-29 presents residents' degree of agreement with the statement, "I can easily get to the places I want to go using my preferred transportation option for members of selected protected classes and low income households by jurisdiction. In general, residents somewhat agreed with the statement, but widely across groups and jurisdictions.

Figure IV-29. Access to Transportation, by Jurisdiction and Selected Protected Class Characteristics and Low Income Households
I can easily get to the places I want to go using my preferred transportation option.



Note: Not all groups had a sufficient number of responses to report results.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Transportation provision. The Regional Transportation District (RTD) provides public transit of busses, light rail and commuter rail in the Denver metropolitan area. RTD was created in 1969 by consolidating local transit services and it maintains service in eight of the twelve Denver metropolitan-region counties. A 15-member, publicly elected board governs the entity that has a service area of 2,337 square miles. RTD is one of only a few elected transit boards in the nation, which can complicate the district's ability to quickly respond to needs.

Impact of transit investments. In 2004, voters approved an increased sales tax of 0.4 percent to add 122 miles of commuter rail, light rail and express bus service to the RTD service area. The project, FasTracks, was originally estimated to cost \$4.7 billion and be completed in 2017. The 2008 economic crisis negatively impacted RTD revenues while material costs precipitously increased, increasing the project budget to \$6.5 billion. As a result, the project completion date was extended to 2044 with some lines dependent on future public private partnerships. Despite the reductions in implementation, FasTracks helped to create the 8th largest transit system in the US in what is the 19th most populous US city.⁸

Despite the transit expansion, ridership has not increased in the Denver metropolitan region. In 2016, only 6 percent of people in Denver commuted to work using mass transit.⁹ Ridership was down 4 percent between 2010 and 2015 despite significant population growth in the region. This is a trend occurring in many cities and is attributed to low gas prices, more consumers buying cars, and the rise in transportation alternatives (Uber and Lyft).

Low income users. RTD one-way fares are \$2.60 for local rides, \$4.50 for regional rides and \$9.00 to the airport. Discounted fares of 50 percent are available for seniors, people with disabilities, Medicare recipients and school children ages 6-19 years old. RTD also partners with local employers on a transit pass called EcoPass, which provides riders unlimited rides for \$2,000 year. Some employers cover the total cost of the pass.

According to RTD, low-income riders account for just 10 percent of EcoPass users.

Advocacy groups argue that RTD is too costly for low-income populations. According to Mile High Connects, a local transportation advocacy group, low-income populations in Denver spend 25 percent of their income on transportation, compared to 17 percent for the population at large. In response, RTD has initiated a re-evaluation of its fare structure with the board and advocacy groups for implementation in fiscal year 2019. Advocates have proposed increased fare subsidization for low-income and youth riders in the process; RTD's financial challenges complicate this policy implementation.

Critics of FasTracks also posit that commuter light-rail was prioritized over bus transit and yet the natural users of transit utilize buses. The decreased usage, in addition to reduced grants and diminishing sales tax collection, has affected RTD's revenue and in 2019 RTD is expected to have

⁸ http://www.dailycamera.com/news/boulder/ci_31547424/rtd-ecopass-likely-saved-advisory-group-eyes-new.

⁹ <https://www.citylab.com/transportation/2017/11/denver-public-transit-growing-pains/544472/>

an annual shortfall of \$30-40 million¹⁰ and overall debt of nearly \$4 billion.¹¹ As a result, the agency is expected to reduce transit service throughout the region in 2018.

Residents in the focus groups conducted for this study share this concern. Residents in the Montbello/Gateway neighborhood described reductions in routes that they use to access work and Denver Health, which they believe were related to light rail operating costs.

Aurora residents have also been vocal about reductions in the R-Line's off peak and weekend service. Many residents are concerned about the impact of the reductions on Aurora residents who use the line to access jobs in Park Meadows Mall (an area with little affordable housing).

"Bus tickets are expensive." – Resident focus group participant

In contrast, residents experiencing homelessness who had lived in other cities feel that bus service in the region is very strong, better than in other cities.

Spanish speaking users. Most of the criticism of RTD by Spanish speakers was associated with service for seniors with disabilities. Spanish language materials do not appear easily available on the RTD website for the Access-a-Ride program. The application form on the website is English-only and no option seems available for selecting another language. A search on other transit authority websites' (NYC, LA) shows more readily available translated materials. Spanish speaking, disabled focus group participants expressed reticence to utilize the Access-a-Ride service because of perceived discrimination of bus drivers.

Persons with disabilities. RTD provides a federally mandated Access-a-Ride transportation service for users with a disability who are unable to get to and from a bus stop or who have a cognitive disability. Participants are required to have an in-person functional evaluation and a physician's statement as part of the certification process. Users must pre-schedule trips and are still required to pay the one-way transportation fares; health aides that accompany a disabled passenger ride free.

In 2017, RTD put the Access-a-Ride service contract up for bid early due to complaints of the quality of the service. Users reported severe ride delays or lengthy trips due to multiple pick-ups and stops. The former service provider cited Colorado's low unemployment and federal drug testing requirements as reasons for a driver shortage that affected service quality.

Other than light rail or the bus, Access-a-Ride is the only source of transportation for many residents with disabilities. Uber and Lyft are not feasible options because they do not accommodate physical needs, may not feel safe for residents with cognitive disabilities or anxiety disorders, and are expensive.

¹⁰ <https://denver.streetsblog.org/2017/09/06/cuts-to-transit-service-are-coming-as-rtd-faces-budget-shortfall/>.

¹¹ http://www.dailycamera.com/news/boulder/ci_31391678/rtd-struggling-might-boulder-launch-regional-transit-authority.

When asked about Access-a-Ride in focus groups, residents had mixed responses. A handful described the program in a positive light. Most described problems they had encountered:

- Access-a-Ride is not dependable. Some residents said they missed doctors' appointments because the drivers failed to show. Others said they would not rely on the service for work because of its unpredictability.
- An amputee living in northeast Denver, who is a monolingual Spanish speaker, was told when she called to enroll in the program that she was ineligible because she "was obviously not a citizen." She currently takes three separate buses to her Denver Health appointments, for a three-hour one-way trip.
- One resident was told she needed to demonstrate that she could not "walk two blocks in cold weather" to qualify for Access-a-Ride.

"Getting to the doctor requires a car." – Resident focus group participant

City transit initiatives. Some cities within RTD's service area supplement the transit service RTD provides. The City of Boulder partners with RTD to operate an extensive circulator called Hop, Skip and Jump. Boulder funds the buses and marketing and RTD operates the buses. The City of Boulder also provides a free bus pass to riders traveling within the downtown Boulder service area.

In Denver, the City and County of Denver is working to supplement RTD bus service with the implementation of a Bus Rapid Transit (BRT) service on East Colfax—the area of the region with the highest concentration of R/ECAPs. This corridor has some of the strongest bus ridership in the region, which is projected to increase significantly (22,000 riders daily; usage is expected to increase by 25 percent by 2030). To meet the growing demand, the City is managing the BRT implementation and providing local funding rather than RTD; Denver voters approved \$55 million in a General Obligation bond vote in November 2017 and Denver will apply to the Federal Transit Authority for the balance of the \$150 million project cost. Once implemented RTD is expected to operate the buses, with Denver likely contributing to the operational cost.

Both cities, Denver and Boulder, are also studying the feasibility of increasing their local transit service and authority in order to provide improved local transit service. In October 2017, Boulder City Council commissioned a study to consider the creation of a regional transit authority "RTA" that would provide local transit while Denver separated its transit management from its public works department in order to improve transit service. Denver also created a first-ever transit plan in 2016 that is identifying the transit corridors with greatest need and means for funding their needed improvements.

Interstate 70 expansion. In late 2018, the Colorado Department of Transportation plans to begin the reconstruction of 10 miles of Interstate 70 highway along Denver's northern border. This section of the city is largely lower income, of Hispanic descent, and has been home to generations of residents who were denied housing opportunities in other parts of the city due to segregation, discrimination, and housing costs.

The project will expand the highway to include an express lane in each direction, remove an aging viaduct and lower the highway in one portion to add a 4-acre park. Significant opposition continues to exist for the project after multiple years of litigation. Transportation critics charge that highway expansion is transit planning of the past. Community members highlight the environmental injustice of the original highway construction and argue the expansion is a continuation of this injustice.

Disability and Access Analysis

The needs of persons with disabilities are rarely captured in secondary data. This is because of the complexity of needs and correlation between disability and age. As such, this section focuses on an analysis of primary data, collected through focus groups and surveys.

Population. There are more than 250,000 people with disabilities in the greater Denver-Aurora-Boulder region, or about 10 percent of residents. The counties with the highest proportions of residents with a disability are those with aging populations (Arapahoe and Jefferson Counties), in addition to Denver. Douglas and Boulder Counties have the lowest proportion of residents with disabilities at 6 percent and 7 percent, respectively.

The incidence of disability increases with age: Typically, half or more of residents older than 75 years of age have some type of disability. Disability, then, is a condition that will affect the vast majority of the region's residents.

If the prevalence of disability remains constant by age, the number of persons with disabilities will double by 2040. The largest increase in numbers will occur in Arapahoe County, Adams County, and Denver—all of which will increase their populations of persons with disabilities by approximately 50,000.

Housing and community needs. More than 1,000 people with disabilities were surveyed for this study. Their survey responses were supplemented with focus groups with persons with disabilities and stakeholders who work closely with persons with disabilities. Characteristics of respondents whose household includes a member with a disability include:

- Half rent and one in three are homeowners. The remainder, 17 percent, are precariously housed;
- One in five (21%) receive disability benefits; and
- For transportation, 35 percent use public transit; one in five most often drive with someone else; and one in 20 (5%) rely on paratransit services.

Section III presented information about the disproportionate housing needs, including displacement and discrimination experienced by residents with disabilities.

Access to transportation is a persistent barrier experienced by residents with disabilities when seeking employment, health care services, or accessing community amenities, facilities and services such as parks, libraries and cultural events and festivals. When asked, "What is most

needed to help the person with a disability in your household to get a job or a better job?" the most frequently mentioned recommendations are:

- *Access to transportation;*
- Employment training, coaching, and education;
- Outreach to employers to encourage them to hire people with disabilities;
- Mental health services;
- ADA accessibility accommodations in the workplace; and
- Sidewalk improvements for connectivity to employment opportunities.

With respect to helping the person with a disability in their household receive better health services, the top answers involved:

- *Access to transportation;*
- Affordable health insurance; and
- Doctors willing to accept Medicare or Medicaid.

Needed in order to improve access to community amenities, facilities or services such as parks, libraries, government buildings, cultural facilities and festivals/events are:

- Access to transportation;
- ADA accessibility;
- Outreach to the disability community to alert them to opportunities to participate; and
- Accessible parking.

Focus groups with persons with disabilities highlighted the severity of the challenges that residents with disabilities face in the current housing market. Unless they have secured permanently affordable housing, they live in a state of transience. When asked about their housing situation, one attendee responded with:

"I move around [with my Section 8 voucher] as buildings close."

Many people with disabilities must occupy substandard, overcrowded housing because their options in the current market are significantly limited. Wait lists are very, very long. Finding an affordable rental was the highest priority of participants in the AI research; they were far less concerned about location than avoiding homelessness.

Attendees who had lived in Denver for many years reflected on how much easier it was to switch apartments decades ago. Ironically, the region's building boom has created less housing available for persons with disabilities:

"This transit oriented development (TOD) boom is pricing us out of what used to be affordable housing that worked for people with disabilities...because it was in undesirable locations."

Primary challenges include:

Severe shortage of affordable, accessible housing. The housing crisis results in persons with disabilities living in very challenging situations. It is common for persons with disabilities to live in severely compromised conditions due to housing shortages.

- An older woman lives in her aunt's tough shed in her backyard. She has no electricity and is diabetic and is going blind. This woman had housing but was evicted for taking in her pregnant, homeless daughter. She sometimes finds refuge by riding the bus "but that costs a lot of money."
- Another woman, with a cognitive disability, secured publicly assisted housing. When her son and daughter and her grandson became homeless, she took them in—and then was told she would be evicted if they stayed.
- A single mom who was a victim of domestic violence needs a secure facility where her harasser cannot locate her, yet she is unable to find one. She needs a specific location of affordable housing, far from the abuser—and cannot find resources to assist her.

Families are particularly affected in the current market: Large bedrooms are especially difficult to find; 3 bedrooms rent for \$2,500 per month—nearly twice what Social Security and Disability Insurance (SSDI) and SSI pay.

"I had to ask my daughter and grandson to leave my apartment or else I would be evicted. They ended up homeless. It was the hardest thing I have ever done."

3x rent income penalty. A landlord's requirement that renter income be 3 times (3x) the rent has a disparate effect on a person with a disability because their ability to work is limited, as is their income. Many rely on SSDI as their sole source of income, meaning they can only pay between \$350 and \$450 per month for rent. They are trapped between how they are compensated by the government and what landlords require they earn to obtain housing.

Lack of emergency housing and/or housing options when evicted. There is no emergency housing in the region for people with disabilities who are being evicted. Most shelters do not have the ability to accommodate the needs of persons with physical disabilities (many cannot sleep on the floor) or with support animals.

Limited case management. Frequent changes in [social service or housing] caseworkers is a huge challenge, especially given how difficult it can be to find a person with a disability housing in the current market. People with cognitive disabilities may have trouble processing very long applications. These residents may also react more strongly to threats of eviction because they

have been moved around and/or their housing options are significantly limited. Property managers don't understand this and may be quick to identify and evict them as "problem" tenants.

Housing resources. The region lacks reliable information to find *accessible and affordable* units, especially in formats that are easily accessible and understandable. Attendees of the Atlantis focus group said that, because of the absence of resources for affordable units available for rent, they first do a Google search when they think they are going to lose their homes...then resort to driving around areas with active construction projects to see if they can identify the builder and then call and ask about rents and availability. This is a burdensome and costly process, especially for someone with a disability who does not drive. Yet they didn't know where else to look.

Some attendees had tried to get information through the 311 line and said it was not useful ("they don't know anything.")

A search on coloradohousingsearch.com, part of socialserve.com, found zero units for rent in Denver between \$0 and \$1,500 with limited accessibility features and which were not senior only housing.

Public transportation. As discussed above, people with disabilities report many challenges with Access-a-Ride. Many find the process confusing and expensive. Some have been told they are ineligible because of their native language or that they need to demonstrate their disability to qualify for services.

Transportation challenges of this sort are not new to the region. In the 1970s, Denver was the epicenter of activism for access to transit for persons with disabilities. The "Gang of 19" sit in that protested RTD's acquisition of new buses without accessibility accommodations put Denver activists on the national stage. Denver's Atlantis Communities was the second Independent Living Center in the nation. ADAPT, started by Atlantis founders, was instrumental in getting the Americans with Disabilities Act passed. ADAPT has also been active in improving nursing home and group home conditions and advocating for non-institutional, independent living options.

Healthy Communities

Residents participating in the focus groups and surveys were asked if their neighborhoods had equal access to parks, recreation centers, and healthy food. Residents living in West/Central Aurora were the most likely to identify inequities. Specifically,

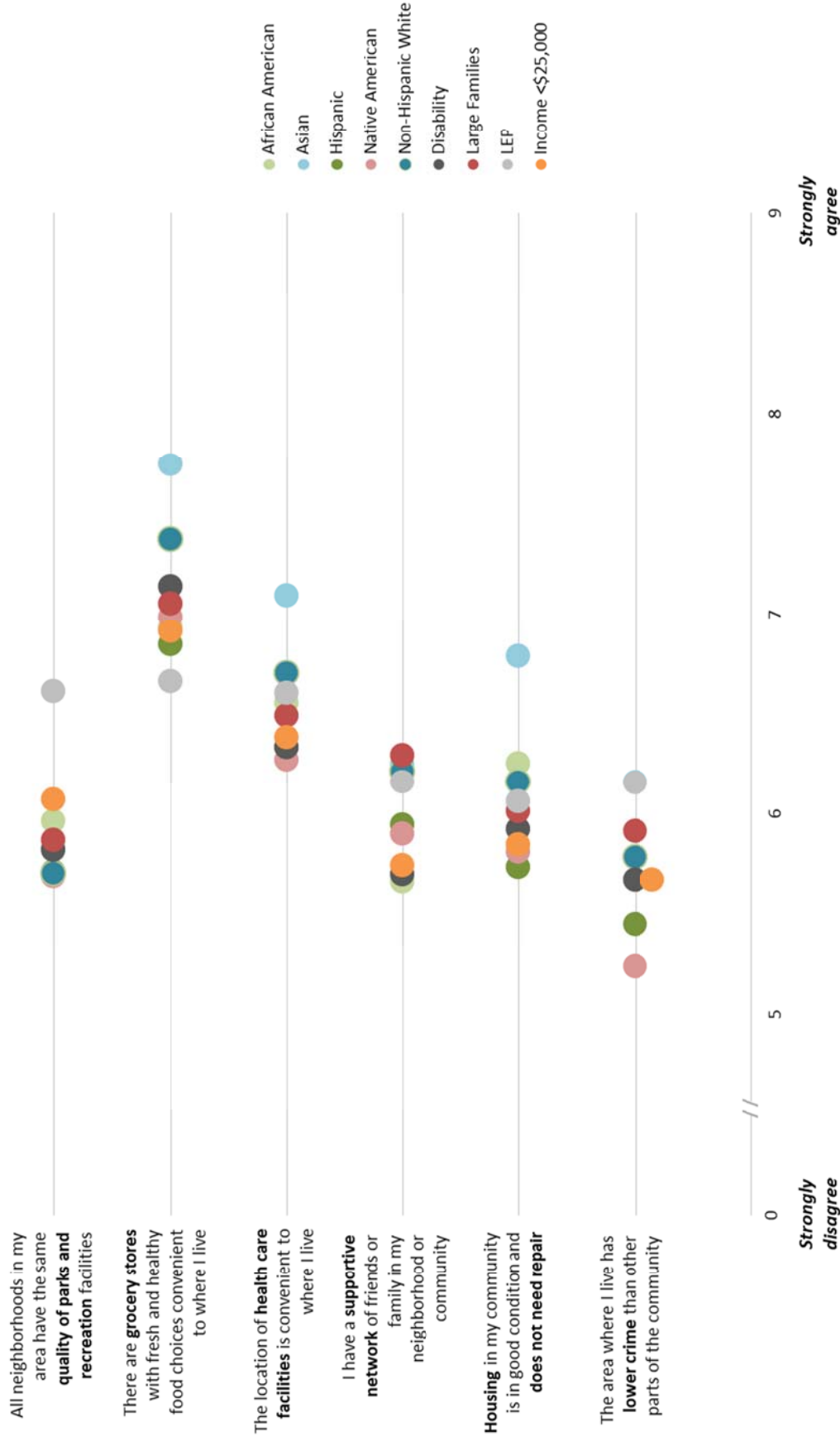
- More afterschool and summer programs are needed, with a discounted bus pass or ride credit. Many children (and seniors) cannot access those that are offered by the city because of transportation issues.
- Residents in lower income neighborhoods live in a food desert and want healthier grocery stores (e.g., Trader Joe's or Sprouts). The stores in their neighborhoods are convenience stores and Walmart (which doesn't have good fresh food and has some accessibility issues). Many are forced to drive far just to get groceries.

Residents in Aurora also said safety concerns prevented many of them from walking outside. They asked for improved security in their apartment complexes and surrounding neighborhood; efforts to prevent gang violence; and a reduction in blighted commercial properties.

Figure IV-30 presents perspectives on a number of healthy neighborhood indicators, including quality of neighborhood parks and recreation facilities, access to grocery stores, access to health care facilities, condition of neighborhood housing stock, crime, and having a supportive network of friends and family in the area. As shown, access to these healthy neighborhood indicators varies across indicators and among members of protected classes and low income households.

The two areas where residents consistently disagree about equity in community amenities are: 1) Quality of park and recreation facilities; and 2) Low crime.

Figure IV-30. Resident Perspectives on Healthy Neighborhood Indicators, by Selected Protected Classes and Low Income Households



Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

SECTION V.

Top Needs and Solutions

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Top Needs and Solutions

This section outlines the goals and action steps Regional AI partners will take to address fair housing and economic opportunity barriers. It provides goals and action items for individual jurisdictions and PHAs, as well as joint goals to address challenges that are prevalent across the region.

The section begins with a discussion of the top housing and economic opportunity challenges. These top needs were developed through analyzing and comparing the findings from the community engagement process, data analysis, and policy and programmatic reviews.

Disproportionate impact. It is very important to note that many of the most significant challenges in the region affect residents who are “under” and “less” resourced compared to other residents. This is very often the result of historical patterns of segregation, denial of homeownership opportunities (a key component of wealth building in this country), limited access to good quality schools, and discrimination in both employment and housing markets.

In many cases, these residents are also disproportionately likely to be racial and minorities, residents who have limited English, residents with disabilities, large families, and children living in poverty.

Prioritization. Prioritization of the fair housing issues was guided by HUD’s direction in the AFH rule. In prioritizing the contributing factors to address, highest priority was given to those contributing factors that, for one or more protected classes:

- Limit or deny fair housing choice;
- Limit or deny access to opportunity; and
- Negatively impact fair housing or civil rights compliance.

Top Fair Housing and Economic Opportunity Challenges

This study was conducted during a period of significant increases in housing costs in the region, displacement of families from high cost neighborhoods, and growing concerns about the effects of gentrification on neighborhoods and housing supply. It is no surprise, then, that the vast majority of top needs identified were related to housing. Limited affordability affects the majority of low income residents, and some more than others. Those who are disproportionately affected are identified in this section.

Top Housing Challenges

Regional challenges

- Severe shortage of housing, especially affordable rental housing for families. Property owners have been actively removing their units from the affordable rental pool (selling homes, raising rents) which has reduced the inventory of rentals available to many renters, ranging from Housing Choice Voucher holders to renters earning more than \$100,000. Low income households with limited resources and lack of a safety net are the most negatively affected by the depletion of naturally occurring affordable housing from the housing inventory.

Much of the new development in the region is being built for small households, forcing families to double-up, settle in poor condition homes, and/or move further from schools and employment.

Disproportionate impact on families, including Hispanic, African American, and certain national origins who have larger household sizes and live with extended families.

- Displacement of residents due redevelopment of multifamily units, sales of rental units owned by investors, and landlords stopping acceptance of Housing Choice Vouchers. Residents have few resources when facing displacement due to lack of “bridge” housing, no “eviction response team” or tenant help line, nor enough emergency assistance.

Overall in the region, 19 percent of residents had to move in the last five years when they didn’t want to due to unaffordable rent increases (reason for 41% of moves) and landlords selling their homes (20%).

Surveys of residents indicate that displacement significantly disproportionately affects African American, Native American, Hispanic, large families and persons with disabilities. In many cases, it is customary for larger families and residents of certain national origins live in extended family environments to manage affordability, to care for elders, and to care for others in their communities. Housing shortages and displacement has significantly disrupted this model, preventing multi-generation families, many of whom provide care for each other, to remain in their communities

- “3x income requirements” for rental units have a discriminatory effect on persons with disabilities whose income is primarily Social Security and Disability Insurance (SSDI). These residents can’t afford rent in the private market and raising their incomes through increasing their employment could reduce their Medicaid benefits.

Disproportionate impact on persons with disabilities and those living on a fixed income.

- Lack of accessible housing. Nearly one-third of residents live in housing that does not meet their accessibility needs. Newly developed rental units created through Americans with Disabilities Act (ADA) requirements typically have monthly rents that exceed the entire monthly income of a resident with a disability living on Social Security Disability Income (SSDI). Residents also have trouble making needed improvements: More than one in 10

(13%) residents in the region cannot afford the housing that has accessibility feature needed.

- Housing discrimination. Overall, 11 percent of survey respondents felt they were discriminated against when they looked for housing in the region. The proportion of residents who believe they experienced housing discrimination varies widely, from nearly two in five (39%) Section 8 voucher holders to 3 percent of respondents with household incomes of \$100,000 or more. About one in four African American residents, residents with disabilities, Native American residents and Hispanic residents felt they experienced housing discrimination. Where discriminatory behavior varies the most:
 - Native Americans and those with a disability are less likely to have their emails to landlords inquiring about units returned;
 - African American, Native American and residents with disabilities are less likely to have their phone calls to landlords inquiring about units returned;
 - African American, Native American, residents with disabilities, and those with household incomes less than \$25,000 were more likely to be told a unit was available by phone but unavailable when they arrived in person;
 - African American residents and large families are more likely to have been denied a home loan, and Asian residents and large families are more likely to say they were charged a high interest rate for their home loan;
 - LEP residents were more likely to have a real estate agent only show them homes in neighborhoods where most people were of their same race or ethnicity.

Challenges mostly unique to Denver

Most of the housing barriers described above are very prevalent in Denver. The most significant barriers reported by Denver residents include:

- Lack of information about housing availability, renters' rights, and landlord tenant mediation services.
- Denver residents with Section 8 vouchers far exceed residents in any other jurisdiction for displacement concerns. Seventy-one percent say they have Section 8 and are worried their landlord will stop accepting vouchers; this compares to 49 percent in the region overall; 46 percent in Aurora; and just 16 percent in the City of Boulder. This concern likely reflects the diminishing stock of affordable rentals, particularly those that fall within HUD's fair market rent range, in Denver.
- Denver residents are also more likely to say they face barriers due to crumbling or old sidewalks; cannot access fresh or healthy food in their neighborhoods; and live in high crime neighborhoods.

Challenges mostly unique to Aurora

Aurora ranked the same as the region in the housing challenges measured by resident responses to the AI survey, except for barriers to accessing rental units created by criminal history. Similarly, Aurora residents with disabilities did not indicate their barriers were higher or lower than residents in the region overall.

The two areas where Aurora residents face the most barriers are in:

- Displacement caused by investors selling rental units. This was much higher than in the region and in any other jurisdiction; and
- Concerns about safety in affordable housing communities and surrounding neighborhoods.

Challenges mostly unique to Boulder Broomfield Consortium Communities

Must racial and ethnic minorities, and especially African Americans, face much lower rates of homeownership than non-Hispanic White residents. The Boulder Valley ownership rate for African Americans is just 33 percent—and a very low 13 percent in Boulder—compared to 40 percent for the region overall.

Resistance to housing development in general, and a strong preference for open space preservation, creates barriers to creation of affordable housing.

Of all jurisdictions, persons with disabilities reported the most frequent and consistent barriers in the City of Boulder. In Boulder, getting requested reasonable accommodations, including service animals, was reported to be a significant barrier. In Longmont (as well as Boulder), affording needed reasonable accommodations is a barrier.

Top Economic Opportunity Challenges. The economic opportunity categories analyzed in this AI included access to quality educational environments (K-12 and adult skill development), access to employment, and transportation access.

Regional challenges. Of all of the economic opportunity challenges analyzed for the study, transportation was consistently identified as the greatest **need**, with the exception of the Consortium. Transportation challenges were often raised in the context of accessing employment. Specifically:

- Residents in low income areas who have experienced reductions in frequency find it increasingly difficult to access employment and health care. Light rail is not viewed as a substitute for these lines due to its high cost and limited geography. Although light rail effectively moves people into employment centers, rail is cost prohibitive for most service and retail workers (at or just above minimum wage).
- In Aurora and Denver, the high cost and lack of direct public transportation to quality schools prevents families from exercising their choice into quality schools. Low income families have high choice-in rates. Without a functional and low cost transportation system for children, they cannot access quality schools because most of the neighborhoods in which these schools are located are unaffordable.

There is a significant mismatch between where jobs are located and where affordable housing is available in most areas of the region. Survey results show this to be most significant in the Consortium. As the region has grown, economic segregation of residents has worsened. According to a recent Pew Research Study, residential income segregation increased substantially in the Denver metro area between 1980 and 2010 and by 2010, the Denver metro area had the 5th highest residential income segregation among the nation's 30 largest metro areas.¹

Communities with high levels of income segregation also tend to have low rates of upward mobility. Among the largest 100 metro areas, Denver ranks 40th for upward mobility of below-median income families.²

There is a significant need for retraining for workers in their 50s and older who have worked labor intensive jobs (e.g., housekeeping) and can no longer perform those jobs and cannot afford to retire. These are people who have always worked and want to work but do not have the skills to perform any other type of work. This includes computer literacy but also soft skills and communication skills. Boulder Valley, with its rapidly aging population, is likely to see this need increase in the next 10 years.

In addition to retraining, ongoing and long term case management and support is needed for workers who are entering the workforce after a period of homelessness or incarceration or separation from their spouses (especially if trauma is involved); workers with disabilities; and workers with past trauma or mental illness. There are "quick start" programs that get people ready to work and into jobs, but lack ongoing support to help those individuals remain employed.

Challenges unique to Denver. In addition to the regional issues above, Denver residents with disabilities repeatedly mentioned challenges with the RTD Access-a-Ride program. Residents find the program very confusing and have a mixed understanding of eligibility criteria. Spanish speakers reported being told they could not qualify when they called RTD in Spanish under the assumption that they are undocumented and/or being hung up on. Residents with disabilities believe the program is too expensive or they would need to pass a physical test to qualify.

In Denver Public Schools, which has the broadest and most varied choice of schools, affordable and convenient transportation is key to ensure that families can equally exercise choice.

Challenges unique to Aurora. As mentioned above, Aurora residents were most likely to express safety concerns in neighborhoods where affordable housing is located, especially along the Colfax, Havana, and along the Yosemite corridors.

Aurora residents also identified transportation to recreation centers and the cost of recreation and sports programs as a barrier to healthy, safe communities for youth and seniors.

¹ <http://www.pewsocialtrends.org/2012/08/01/the-rise-of-residential-segregation-by-income/>

² <http://www.equality-of-opportunity.org/>

Challenges unique to the Boulder Broomfield Consortium. Transportation was not raised often in the Consortium except for access by residents with disabilities, low income residents in Longmont, and in Boulder County. Survey respondents with a disability rated transportation access—especially access by bus or paratransit—as a significant need.

For residents overall, the dominant issue was lack of affordable housing for workforce near employment centers. The Consortium is also challenged by bias about “outside” workers. Some employers subscribe to the notion that workers outside of the area are under- or less qualified than “home grown” employees.

In addition to meeting ADA accessibility requirements, a number of residents suggested that outreach to the disability community was needed to inform them of community amenities and events. Residents who are deaf or with hearing impairments emphasized the importance of sensory accessibility. Outreach to employers to encourage employers to hire people with disabilities was also identified as a need.

Solutions

Housing solutions. The housing solutions recommended below strive to reach a balance between the rights of property owners and the growing housing needs of residents. We recognize that the region has many good landlords, builders, and sellers who have provided high quality affordable and market rate housing to meet a variety of resident needs. The vast majority of property owners and housing providers follow rules, treat tenants fairly and equitably, and are good partners.

Some housing providers, however, are taking advantage of limited choices many tenants have in the current housing market (namely undocumented families and workers; tenants with poor or limited credit histories). These are most prevalent in the rental market. It was common for residents participating in the study to report landlords demanding mid-month payments, refusing to make repairs and then evicting tenants for making repairs on their own, claiming cash rent payments were not received, accepting applications with high fees from more applicants than needed to fill a unit, and charging extra rents for children. These behaviors are easy to accomplish in the current market because tenants are reluctant to report potential or real fair housing or contract violations.

Rental solutions. To address rental needs, we recommend a mix of solutions that 1) Seek legislative changes needed to create a fairer market for renters, 2) Reward housing providers who are willingly providing affordable and quality housing, and 3) Increase the supply of rental housing.

Regional

- Enact ordinances or state regulations that prohibit per person rent add-ons unless there is a demonstrated relationship between the fees and additional costs (e.g., increased utilities costs that are shown through utility meters). This practice, which is reportedly common, especially among Hispanic families, could be found to be in violation of fair housing laws. A less questionable practice would be to charge tenants for utilities directly.

- Similarly, enact ordinances or state regulations that prohibit per person rental application fees. This practice has a disproportionate effect on families. This practice is inconsistent with industry standards for the more regularly regulated mortgage lending industry—e.g., mortgage lenders do not charge per person fees for loan applications.
- Encourage and support state or pass local laws that place a cap on the amounts charged for application fees and the number of applicants from whom fees can be received.
- Encourage and support state legislation or pass local laws that require documentation of rent payment from landlords. If in cash, landlord must use an electronic receipt and have tenant verify payment.
- Explore the possibility of state legislation that explicitly includes child support and SSDI as qualifying income in rental applications. States nearby have set precedence for this: 1) The Utah Fair Housing Act prohibits discrimination based on source of income; 2) North Dakota offers fair housing protections for households receiving public subsidies; 3) The State of Oregon extends protections for source of income, originally defined as social security income or disability income and now includes Section 8 vouchers and other forms of rental subsidies.
- Explore restrictions on rental eligibility solely based on “3x income.” This practice has a discriminatory effect on persons with disabilities whose income is primarily Social Security and Disability Insurance (SSDI). These residents can’t afford rent in the private market and raising their incomes through increasing their employment could reduce their Medicaid benefits. They are uniquely trapped by this practice.
- Encourage and incentivize best practices by landlords. As part of rental registration requirements, include training for (small) landlords not part of a larger property management company. This would cover the proper process of eviction (notification period), how to handle cash payments, reasonable accommodations laws, property standards and responsibility to make improvements, how to work with/contract with tenant if they want to make improvements, and best practices in working with non-English speakers and tenants of a variety of cultures (e.g., covering what it means to them when they are embarrassed/evicted in front of families).

Denver and Aurora (independently or, ideally, in partnership)

- Prioritize creating alternative housing solutions (co-op housing) that add to the inventory of housing for persons with disabilities and people at risk of homelessness. These should include tiny home villages with wrap around services, such as the Community First Village in the Austin region (unincorporated county). Some may be targeted to residents with criminal backgrounds using best practices from successful re-entry models.
- Create “Bridge Housing” for residents experiencing eviction. Proactively seek and acquire land and hotels along East Colfax and in surrounding neighborhoods to the north, where poor condition and overcrowded housing is playing this role, to create a temporary housing community for people who have faced eviction (e.g., residents can remain in the housing at

very reduced rent while looking for an apartment. Housing counselors would be available on site).

- Continue or increase, as available, funding to assist residents with sudden and post-eviction relocation (costs of security deposit for new unit) or temporary housing (voucher to cover low-moderate priced hotel, perhaps in agreement with underutilized hotels). Collaborate to develop best practices for eviction responses including consistency in emergency assistance, one-stop-shopping for resources, and model temporary and transitional housing developments.
- In considering public investments, evaluate the potential for displacement of residents and the impact of such investments on naturally occurring affordable housing. Preservation strategies should be part of the planning process.
- Educate police officers about tenants' rights and eviction processes, potentially through a regional training workshop. Consider creating an "eviction response team" akin to resource officers that assist persons experiencing homelessness. This may include an office with an "eviction ombudsman" or representative akin to a public defender.

Denver

- Create a tenant based rental program, similar to the LIVE program explored by the city, that buys down market rate accessible units created through ADA requirements and not rented.
- Consider a small landlord incentive program that provides rehabilitation, weatherization, and/or home improvements to landlords in exchange for keeping rents affordable for a set time period. This fund could be created in partnership with foundations and administered by a nonprofit or neighborhood groups to maximize small landlord participation (grassroots recruitment) and support a preservation focus.

A related solution would be to create a fund that provides funding and discounted financing to homeowners who desire to create an affordable accessory dwelling unit (ADU) on their property. One of the biggest barriers to ADUs supplying affordable rentals is the cost of construction and limited financing.

- As part of future density bonus programs, provide greater densities or incentives for developments that create affordable family units and affordable accessible units with community benefits for persons with disabilities.
- In application scoring and funding awards, prioritize rental developments with larger unit sizes and units for persons with disabilities.
- Explore a neighborhood preservation fund that neighborhood groups could apply for and draw on to craft unique solutions to housing preservation. This might include assistance with the rental search process, providing assistance with translation and interpretation of rental leases, conducting "how to be a good tenant" classes, and providing funds to incentivize small landlords to continue renting to low income, local residents.

- Incorporate fair housing and equity opportunity planning into all aspects of planning decisions. Evaluate access to employment, quality schools, adult skill development, child care centers, and housing that accommodates a variety of residents types (especially those found to have the most significant needs) as part of neighborhood plans, development funding applications, and development agreements (including density bonuses). A starting point would be to review the Equitable Development Scorecard developed by The Alliance in Minneapolis, <http://thealliancetc.org/our-work/equitable-development-scorecard/>

Aurora

- Work with develop partners (private, nonprofit, faith community) to proactively add inventory to the affordable and mixed income housing stock. Embrace creative, community oriented environments such a co-ops and tiny home villages that mitigate the severe housing shortage for low income families, refugees in resettlement programs, persons with disabilities, and people experiencing homelessness. Such a program could be paired with a sweat equity models and be used to retrain under- and unemployed residents.
- Explore funding quality, 24/7, on site security for publicly-subsidized housing in higher risk neighborhoods.
- Consider a land banking program that makes use of vacant land and underutilized properties along aging corridors (e.g., East Colfax), prioritizing those likely to redevelop and lose affordability as a result of private and public sector investment.
- Consider a small landlord incentive program that provides rehabilitation, weatherization, and/or home improvements to landlords in exchange for keeping rents affordable for a set time period.

PHA Partnerships

- Continue to partner with PHAs and support the creation of affordable housing. Identify opportunities to repurpose vacant land and underutilized commercial properties into housing units that address disproportionate needs.
- Explore a temporary program that waives local occupancy ordinances and allows families to live together in a slightly overcrowded situation if they can demonstrate a family member would become homeless otherwise.
- Work with the jurisdictions to explore additional funding for supportive services, including solutions to improve resident safety where needed, perhaps using a social impact bond model. The job of PHAs has gotten more complicated due to market conditions, yet they have limited resources to assist people. Lack of services ultimately costs the public sector money in criminal activity, public health care, perpetuating limited economic opportunity of affected residents.

Ownership solutions. Solutions recommended to address ownership challenges address the most severe barrier in the region—preservation of housing and neighborhoods.

Regional

- Examine legal solutions to creating a version of a Real Estate Transfer Tax (RETT) that would support a fund which provides downpayment assistance to displaced residents and/or acquisition of units for sale by cities for resale to displaced residents. This would be based a proportion of home value and should also be applied to luxury and short term rentals of single family units. This type of tax would allow residents benefitting from high home prices (sellers and second homeowners) to directly support preservation of homes in neighborhoods where this real estate activity is displacing longtime residents.

Denver

- Similarly, explore creation of an excise tax on properties that are flipped or sold as scrapes. Such a fund should be reinvested in the neighborhood to buy down properties to prevent displacement.
- To help owners offset the cost of ownership by generating income through rentals (and also adding to the rental housing stock):
 - Consider a small landlord incentive program that provides rehabilitation, weatherization, and/or home improvements to landlords in exchange for keeping rents affordable for a set time period. This fund could be created in partnership with foundations and administered by a nonprofit or neighborhood groups to maximize small landlord participation (grassroots recruitment) and support a preservation focus.
 - A related solution would be to create a fund that provides funding and discounted financing to homeowners who desire to create an affordable accessory dwelling unit (ADU) on their property. One of the biggest barriers to ADUs supplying affordable rentals is the cost of construction and limited financing.

Denver and Aurora

- Develop an incentive for small landlords to offer homes that have been rented for sale to the longtime tenants with city assistance. Cities could pay Realtor costs or cover bringing homes up to code (up to a certain amount) on properties that are sold to displaced residents. There may be an opportunity to work with foundations to create such a fund.
- In Aurora, 35 percent of voucher holders live with a disability, compared to 11 percent in AHA properties and 9 percent in the Region overall. In typical markets, persons with disabilities have trouble finding accessible units outside of those provided by public housing entities. The ability of voucher holders to access the housing they need in Aurora is unusual and should be an area of continued focus in housing programming. It is important that the City continue to offer grants for home modifications, in owner and rental properties, to maintain accessible housing stock.

To that end, the City should maintain home rehabilitation and lead hazard mitigation programs. Not only do these programs help future renters attain homeownership when they cannot service a mortgage and home improvement loan, they also are a cost effective way to keep units affordable and accessible (avoiding units failing into such disrepair that they must be razed).

Solutions to address limited knowledge and capacity of housing resources. It is important that all members of a community—residents, community leaders, landlords, HOA board members—correctly understand fair housing laws so they do not intentionally or inadvertently deny a member of a protected class the same housing rights as other community members. It is also critical that residents who feel they may have experienced discrimination be able to access resources to investigate their rights and/or file a complaint.

Regional. The region has a significant need to improve “Housing Literacy” for residents. Lack of knowledge about fair housing laws by both landlords and renters is a major challenge for residents with limited English, residents with disabilities, and refugees. In addition, these residents are in need of landlord and tenant mediation services and easy-to-access information about housing availability in multiple languages and accessible formats.

These residents are in need of:

- A reliable, accessible housing search tool/list of publicly supported housing in plain language and in a wide variety of languages other than English.
- A renters’ rights app or renters rights cards (similar to those developed by Candy Chang in New York) with simple explanations about the landlord tenant relationship, eviction rules, habitability rules, reasonable accommodations and pet/service/companion animal laws. The resources should be available in a wide variety of languages.
- A partnership with public schools (potentially through funding provided by a foundation) to provide information and referrals to families when they are in precarious housing situations. This should include programs for teenagers to receive education on fair housing and renters’ rights.

In addition, all participating jurisdictions and PHAs could improve the fair housing information on their websites. The jurisdictions and PHAs should work together to create a uniform description of fair housing laws (federal, state, local), available resources, Q&A, and links to regional resources that can be uploaded on all parties’ websites. The information in Appendix A and on the website created for this AI is a starting point.

Solutions to reduce economic inequities. Initiatives that are most important to close existing economic gaps and which should be embraced by school districts throughout the region—and supported by jurisdictional leaders—include the following. These should be achieved through building a shared commitment and strengthening partnerships between educational institutions, employers, and regional players such as the Mayor’s Caucus, RTD, and DRCOG:

Work with school districts and RTD to improve access to open choice in public schools:

- DPS, at the recommendation of its Strengthening Neighborhoods Committee, is exploring how to create high quality, integrated schools through goal setting; priority enrollment of underrepresented students in high proficiency schools; and enrollment zones that are intentionally diverse. The effect of this effort would be magnified by a regional approach to remedy the unintended effects of open enrollment and use of charter schools.
- School districts should require that charter schools set aside a portion of seats to children participating in the free and reduced lunch program. In many districts, charter schools simply do better at equalizing the educational opportunity for kids.
- School board leaders must be more intentional about equity when granting charters. Helping to promote school integration—especially in a region that is becoming more diverse in suburban areas—should be a commitment made by all school districts.
- Push RTD to articulate and recognize the role it can play in improving equity. RTD must internalize the role it plays in facilitating the state’s open enrollment law and addressing educational gaps.
 - Encourage RTD to reduce the costs of transportation for low income children by offering a discounted bus pass for low income students.
 - Remove the requirements that to be eligible for an RTD pass, high school students must attend the boundary schools that serve the neighborhoods where they live.

As part of funding contributions, mandate that RTD improve Access-a-Ride practices to reduce barriers to access. RTD must commit to making the process friendlier, more transparent and predictable, more accommodating to LEP residents; and more accommodating to residents with developmental disabilities.

Examine and create private- and foundation-sponsored solutions to employment access. Work with employers, private sector, and foundations to create a flexible fund, similar to the 360 Fund used by Emily Griffith Technical College, to provide emergency cash assistance for gas, car repairs, and bus passes. Emergency transportation is imperative to prevent residents from losing jobs and dropping out of school due emergency situations for which they may be penalized.

Incorporate access to quality education into other types of community planning. Education, housing, land use, and transportation planning typically occurs as a “silo-ed” process. And these silos extend to regional planning. All community planning efforts should be viewed in the context of equity—especially in education, where increasing equity begins.

A starting point is for the jurisdictions and PHAs to work together to help policymakers to view education as an economic development investment. Providing access to lower poverty schools for low income children is imperative if the state and city desires to grow human capital from within. Education must be perceived as a long term investment, not an annual expense. This

reality needs to be communicated—perhaps through a regional social marketing campaign—to parents in all districts, to address myths about student integration.

As part of economic development incentives and programs, require that:

- Job training information is delivered in Spanish. Classes and job connections offered at local elementary schools.
- Invest in job training programs for adults in their 50s and older or who have health issues/injuries and are no longer physically capable of performing labor intensive jobs.
- Develop social impact bond or other funding stream to smooth out the TANF/SNAP benefits cliff for working adults. Creating an incentive for them to continue on the path to self-sufficiency and rewarding income growth.

Goals and Action Item Matrix

A matrix summarizing the goals established from this work is shown below. This matrix is structured for ease of incorporation into Consolidated Plans, CAPERs, AI updates and housing plans.

The goals, organized by region and participating partner, were vetted by the consultant team to ensure that they were meaningful, realistic, and would make a clear difference in addressing the many needs that exist in the region. To that end, they fall into one of two categories:

Big impact—These are action items that require investment of resources (time and money) and which will make the biggest difference in mitigating barriers. Big impact ideas are provided at both the regional and local and PHA level.

Easy wins—These are action items that are relatively easy to accomplish and require few resources.

These goals and action items embrace quality, and the ability to facilitate partnerships to address needs, over quantity.

Placeholder for goals and action item matrix (provided in Excel) after city/county/PHA review

APPENDIX A.

**What Should I Do If I Think I Have Been
Discriminated Against?**

APPENDIX A.

What Should I Do If I Think I Have Been Discriminated Against?

The Federal Fair Housing Act (FFHA) was part of the federal Civil Rights Act of 1968. The original language in the FFHA prohibited discrimination in the sale, rental and financing of dwellings in housing-related transactions based on race, color, national origin and religion; gender was added several years later. The FFHA was amended twenty years later, in 1988, to prohibit discrimination on the basis of disability or familial status, and to require accessible units in multifamily developments built after 1991.

Recent court cases—including one in Boulder County in 2017—have concluded that the term “gender” includes gender stereotyping and is a form of gender discrimination in violation of the Fair Housing Act.

Developments exempted from the FFHA include: housing developments for seniors, housing strictly reserved for members of religious organizations or private clubs, and multifamily housing of four units or less with the owner occupying one unit.

State and Local Protections

Colorado and the City of Denver were pioneers on several civil rights fronts. In 1951, Colorado became the third state in the nation to create a civil rights agency—now the Colorado Civil Rights Division. Around the same time (1947), Denver’s mayor established one of the first city-level civil rights commissions. Colorado was also one of the first states to pass a civil rights law.

The State’s employment and housing protections exceed those of the Federal Fair Housing Act by covering marital status and sexual orientation (including transgender status), in addition to race, color, religion, creed, national origin/ancestry, religion, sex/gender, disability, and familial status (federal protected classes).

The City of Denver also protects military status. Boulder’s Human Rights ordinance includes protection for genetic characteristics and is more specific than federal and state acts in that it defines protections as covering mental disability, physical disability, pregnancy, parenthood, and custody of a minor child.

Fair Housing Resources

Municipalities in the region that receive HUD community development and housing funds directly have a legal obligation to affirmatively further fair housing. As such, they have historically been the primary entities engaged in fair housing activities in the region. However, there has traditionally been very little coordinated effort across jurisdictional boundaries.

In 2012, the Denver Metro Fair Housing Center (DMFHC) was established with the support of the National Fair Housing Alliance to be the voice of fair housing in the Denver metro area. The purpose of the DMFHC is to eliminate housing discrimination and promote housing choice through education, advocacy and enforcement of fair housing laws.

Other local organizations actively involved in Fair Housing issues—particularly legal concerns and fair housing complaint management—include HUD’s Office of Fair Housing and Equal Opportunity, CCRD, the Colorado Division of Real Estate, the Colorado Cross-Disability Coalition, Colorado Legal Services and the Legal Center for Persons with Disabilities and Older People.

Residents in the Denver-Aurora-Boulder region can contact the following organizations if they feel they have experienced fair housing discrimination:

Figure A-1.
Local Resources for Fair Housing Information and Complaints

Colorado Civil Rights Division	https://www.colorado.gov/pacific/dora/civil-rights/housing-discrimination
Denver Metro Fair Housing Center	http://www.dmfhc.org/
Colorado Cross-Disability Coalition	http://www.ccdonline.org/
Disability Law Colorado	https://disabilitylawco.org/
Civil Rights Education and Enforcement Center	https://creeclaw.org/
Aurora Fair Housing	https://www.auroragov.org/residents/community_development/fair_housing
City of Boulder Housing Discrimination	https://bouldercolorado.gov/community-relations/what-is-discrimination-in-housing
Denver Anti-Discrimination Office	http://www.denvergov.org/content/denvergov/en/human-rights-and-community-partnerships/our-offices/anti-discrimination.html
Longmont Fair Housing	https://www.longmontcolorado.gov/departments/departments-a-d/community-and-neighborhood-resources/fair-housing-information
Longmont Mediation Services	https://www.longmontcolorado.gov/departments/departments-a-d/community-and-neighborhood-resources/fair-housing-information

Complaint Process

Colorado Division of Civil Rights (CCRD). The Colorado Civil Rights Division is charged with enforcing the state’s anti-discrimination laws in the areas of employment, housing and public accommodation.

CCRD maintains a formal work-sharing agreements with HUD and, through this relationship, has the authority to investigate and resolve housing discrimination complaints. CCRD has exclusive jurisdiction in situations in which Federal antidiscrimination laws do not apply—e.g., in enforcing cases involving sexual orientation as a basis for housing discrimination and in certain

cases of discrimination related to lack of public accommodations and discriminatory advertising.¹

Alleged victims must first complete a housing intake packet. The packet is available online² or may be requested toll free at (800) 262-4845, and includes a housing intake form, a statement of discrimination and an authorization to release information. Once CCRD receives a fully completed intake packet, the housing intake staff will draft a charge of discrimination, which must be signed by the complainant. After CCRD has received a fully executed charge of discrimination, a copy is served promptly on the respondent and the investigative process is initiated. As part of the investigation, the respondent will be asked to provide a written response to the allegation(s). The person filing the complaint will be provided with a copy of the respondent's position statement and will be afforded an opportunity to submit a rebuttal.

The Division also affords the parties the opportunity to participate in a voluntary mediation conference prior to the initiation of the investigation. If the parties wish to avail themselves of the mediation process they can contact CCRD's representative.

If mediation is not held or is unsuccessful, the case will be assigned to a housing investigator. The investigator will analyze all information related to the case and may request information as needed. After the investigation is complete, the investigator writes a summary report and Letter of Determination.

The Letter of Determination states the facts of the case and provides an analysis of the case. If the preponderance of the evidence supports the allegation of discrimination, a finding of Probable Cause is issued. Conversely, if the evidence does not support the claim, a finding of No Probable Cause is issued. Along with the dismissal of the claim, the person filing the complaint is issued a notice of Right to Sue. A Right to Sue Notice allows the person to proceed in court, if desired.

In a No Probable Cause finding, the complainant has the opportunity to appeal that decision to CCRD.

If a finding of Probable Cause is issued, Colorado law mandates that a conciliation conference be held. A conciliator is assigned to work with both parties to try to resolve the complaint. If successful, a formal agreement with the specifics of the settlement is drafted by the mediator and signed by both parties. If efforts to conciliate the case fail, the Director of the Division may issue a dismissal notice along with a Right to Sue letter, allowing the complainant to proceed to court. In some cases, CCRD may authorize the case for hearing before an Administrative Law Judge, with the administrative hearing to begin within 120 days after service of the written notice of hearing and complaint is filed.

¹ Beginning in 2012, HUD released new nondiscrimination policies regarding sexual orientation and gender identity that apply to HUD funded programs.

² <http://www.dora.state.co.us/civil-rights/index.htm>

In addition to investigative activities, CCRD staff have written educational curriculum on housing discrimination for licensed real estate agents. The staff also assists or provides training materials to relevant entities, such as human relation commissions, apartment associations and/or law firms.

Colorado Division of Real Estate. The Colorado Division of Real Estate takes complaints against real estate brokers, appraisers and/or mortgage brokers. Complaints can be filed online³ or complaint packets may be requested by calling the Division at 303-894-2166. The Commission receives an average of one thousand written complaints per year against brokers, salespersons, subdivision developers and appraisers. Approximately 15 percent of those result in some form of disciplinary action. The following information regarding investigations is for the benefit of licensees and the public.

The processes for investigating a complaint differ slightly depending on if the complaint involves an appraisal, a broker or a real estate agent.

When a written complaint is received, it is reviewed and assigned to an investigator. The investigator determines the proper respondent(s) based on information on the complaint. Respondents are added or dismissed throughout the course of the investigation as additional information becomes available. A letter, with a copy of the complaint, is sent to the respondent(s), requesting a response within 14 days. At the same time, a letter is mailed to the complainant, acknowledging receipt of the complaint.

The investigator analyzes the complaint, response and pertinent documents to determine possible license law violations. All parties to the complaint, as well as witnesses, are interviewed. The investigator also contacts attorneys, mortgage companies, title company personnel and others who have knowledge of the situation. Additional documents may be sought from county offices and civil courts.

Upon completion of the investigation, the investigator prepares a written report concerning the facts that have been obtained. At that time the complaint may be dismissed on the basis of insufficient evidence of a license law violation or for lack of jurisdiction. If that is the case, all parties to the complaint will receive letters informing them of the disposition.

If, however, the facts obtained appear to indicate a violation of license law, the report is submitted to the appropriate Board or Commission for consideration. At this time, the Board/Commission may vote to dismiss, admonish the respondent(s), or refer the matter to a formal hearing. The Board/Commission has the discretion to summarily suspend the licensee if there appears to be an immediate danger to the public.

If the matter proceeds to a formal hearing, it is held in accordance with Colorado state law(s). After hearing the matter, the Administrative Law Judge makes an Initial Decision, which is forwarded to the parties and the Board/Commission for their review. The Initial Decision includes findings of fact and conclusion of law. The Board/Commission may or may not adopt

³ www.dora.state.co.us/real-estate/Complaints/Complaints

the Initial Decision. The respondent licensee may file objections to the Board within 30 days after receiving the Initial Decision. After consideration of the Initial Decision and any objections that may be filed, the Board/Commission may vote to adopt the Initial Decision or it may vote to modify the Initial Decision by increasing or decreasing the penalty. The Board/Commission may also vote to remand the Initial Decision for clarification or rehearing.

After the Board has issued its order in the matter, the licensee may appeal the case to the Court of Appeals and, in some instances, appeal again to a higher court.

Denver Metro Fair Housing Center. In addition to education and outreach, the DMFHC conducts investigations and assists with the resolution of complaints of housing discrimination. DMFHC also conducts testing and will bring lawsuits on the basis of testing results. DMFHC can be reached at 720-279-4291.

Colorado Cross-Disability Coalition (CCDC). The Colorado Cross-Disability Coalition, or CCDC, is dedicated to ensuring the independence, self-reliance and full participation of people with all types of disabilities in Colorado. CCDC can be contacted online⁴ or the Advocacy Program department can be reached by phone at 303-839-1775, option 2. The CCDC Legal Program brings lawsuits on behalf of CCDC and its members to enforce the Americans with Disabilities Act (ADA) and other statutes that protect the civil rights of persons with disabilities.

Disability Law Colorado. (Legal Services). Disability Law Colorado provides legal assistance to low income persons with disabilities, including seniors. In addition to various other types of cases, the organizations assist qualifying households with fair housing issues. Their services depend on the potential case, but range from advice from an attorney to legal assistance and representation in court. The organization assists people with disabilities that are in jeopardy of losing their housing for reasons related to disability and accessibility, in addition to advocating for the provision of legally required accommodations. They also provide ADA compliance training to schools, long time care providers, and other related organizations. The website is <https://disabilitylawco.org/> and phone is

Department of Housing and Urban Development (HUD). Housing discrimination complaints filed with HUD may be done online⁵; by calling toll free at 1-800-669-9777; or by contacting the Office of Fair Housing and Equal Opportunity in Washington D.C., or the HUD Denver Regional Office of Fair Housing and Equal Opportunity.

When HUD receives a complaint, HUD will notify the person who filed the complaint and will normally notify the alleged violator and allow that person to submit a response. The complaint will be investigated to determine whether there has been a violation of the Fair Housing Act.

A complaint may be resolved in a number of ways. First, HUD will try to reach an agreement between the two parties involved. A conciliation agreement must protect the filer of the

⁴ <http://www.ccdconline.org>

⁵ <http://www.hud.gov/complaints/housediscrim.cfm>

complaint and public interest. If an agreement is signed, HUD will take no further action unless the agreement has been breached. HUD will then recommend that the Attorney General file suit.

If HUD has determined that a state or local agency has the same housing powers (“substantial equivalency”) as HUD, they will refer the complaint to that agency and will notify the complainant of the referral. CCRD is a substantially equivalent local agency (see the CCRD process in the following section). CCRD must begin work on the complaint within 30 days or HUD may take it back.

If during the investigative review and legal processes, CCRD or HUD finds that discrimination has occurred, the case will be heard in an administrative hearing within 120 days, unless either party prefers the case to be heard in Federal district court.

If a person needs immediate help to stop a serious problem that is being caused by a Fair Housing Act violation, HUD may be able to assist as soon as a complaint is filed. HUD may authorize the Attorney General to go to court to seek temporary or preliminary relief, pending the outcome of the complaint, if irreparable harm is likely to occur without HUD's intervention and there is substantial evidence that a violation of the Fair Housing Act occurred.

APPENDIX B.

Interpreting HUD Maps and Tables

APPENDIX B.

Interpreting HUD Maps and Tables

To help communities complete fair housing analyses, HUD has created maps and data tables that help determine where residents face barriers to housing choice and economic opportunity. Many of those maps and tables are included in this AI; they were also made available at relevant community events and to stakeholders as part of the AI outreach.

The table below provides definitions of the variables and indices in the data tables and maps.

More information about the HUD maps and tables is available on the following website:

<https://www.hudexchange.info/resource/4867/affh-data-and-mapping-tool/>

A note on geographies. The availability of maps and data tables varies depending on which cities receive HUD funding directly. Because the AFFH data and mapping tool was undergoing revisions when this study was underway, data and maps were not available for all jurisdictions that receive HUD funds.

Source of data. The primary sources of the data in the tables and maps are the U.S. Census (10-year and annual American Community Survey), HUD customized models for opportunity indicators, and Public Housing Authority reports.

Access to Opportunity Guide to Maps and Tables

Map/Table Name	What is on the map?	What is the map telling me?
Map 1 Race/Ethnicity	Where residents live by their race and Hispanic descent	Starting point for understanding if certain residents face barriers to housing choice. Can indicate segregation.
Map 2 Race/Ethnicity Trends	How residential patterns have changed over time	Starting point for understanding if certain residents face barriers to housing choice. Can indicate segregation.
Map 3 National Origin	Where residents born outside of the U.S. live by country of birth	Starting point for understanding if certain residents face barriers to housing choice. Can indicate segregation.
Map 4 LEP (Limited English Proficiency)	Where residents who do not speak English well live by primary language spoken	Starting point for understanding if certain residents face barriers to housing choice. Can indicate segregation.
Map 5 Publicly Supported Housing and Race and Ethnicity	Location of affordable rental housing developments and where residents live by race and Hispanic descent	Are affordable rentals located throughout a community or only in certain neighborhoods?
Map 6 Housing Problems	Residents who struggle to afford housing costs and are living in housing in poor condition. Darker shading = higher test scores.	Which residents have the greatest housing needs?
Map 7 Demographics and School Proficiency	School quality measured by elementary test scores compared to where residents live by race, Hispanic descent and country of birth. Darker shading = higher test scores.	Do all residents have access to good schools? Note: the map does not account for school choice programs.
Map 8 Demographics and Job Proximity	Where jobs are located compared to where residents live by race, Hispanic descent and country of birth. Darker shading = more jobs.	Where are jobs located compared to where residents live?
Map 9 Demographics and Labor Market	Neighborhood unemployment and where residents live by race, Hispanic descent and country of birth	Is unemployment higher for certain residents and neighborhoods?
Map 10 Demographics and Transit Trips	How often low income families use transit and where residents live by race, Hispanic descent and country of birth	How much do low income residents use public transportation?
Map 11 Demographics and Low Transportation Cost	How much transportation costs for low income families and where residents live by race, Hispanic descent and country of birth	How much do low income residents pay in transportation costs?
Map 12 Demographics and Poverty	Level of poverty and where residents live by race, Hispanic descent and country of birth	How likely is it that certain residents live in high poverty neighborhoods?
Map 13 Demographics and Environmental Health	Level of air pollution and where residents live by race, Hispanic descent and country of birth	Do some residents live in neighborhoods with unclean air?
Map 14 Disability by Type	Where residents with disabilities live by type of disability	Where do residents who have disabilities live? Does where they live provide access to transit, services and health care they need?
Map 15 Disability by Age Group	Where residents with disabilities live by age	Are most residents with disabilities seniors? Children?
Map 16 Housing Tenure	"Tenure" means renting or owning. Where residents who rent or own live.	Where is rental and homeownership housing located?
Table 1 Demographics	Location of rental housing affordable to renters earning about \$40,000 and less	Is affordable rental housing distributed throughout the city or county?
Table 2 Demographics Trends	Demographic characteristics of residents in the city, county and region	How diverse is the city and county compared to the region?
Table 3 Racial/Ethnic Dissimilarity Trends	How demographics have changed over time	How has diversity changed over time?
Table 4 R/ECAP Demographics	The "dissimilarity index" is a measure of segregation which compares where residents live compared to White residents. A score of more than 55 = high segregation.	How segregated is the city or county? Is this different for racial groups and residents of Hispanic descent?
Table 5 Publicly Supported Housing Units by Program Category	R/ECAPs are neighborhoods with high levels of poverty and concentrations of non-White, Hispanic residents	What are the characteristics of R/ECAPs? Use this with the maps to understand if residents in R/ECAPs have access to good schools, transportation and jobs
Table 6 Publicly Supported Households by Race/Ethnicity	Publicly-supported housing by type of program	What type of public housing is available?
Table 7 R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category	Occupants of publicly-assisted housing by race and ethnicity	Who lives in public housing? Do public housing residents represent residents in the city/county or are some more likely to need public housing? Why?
Table 8 Demographics of Publicly Supported Housing Developments, by Program Category	Occupants of publicly-assisted housing by residence in R/ECAP	Do demographics of residents differ by R/ECAP? Why?
Table 9 Demographics of Households with Disproportionate Housing Needs	Occupants of publicly-assisted housing by type of housing program	Do different types of public housing serve different residents? Why?
Table 10 Demographics of Households with Severe Housing Cost Burden	Demographics of residents who struggle to afford housing costs and are living in housing in poor condition.	Which types of residents have the greatest housing needs?
Table 11 Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children	Demographics of residents who struggle the most to afford housing costs	Which types of residents need the most help managing housing costs?
Table 12 Opportunity Indicators, by Race/Ethnicity	Occupants of publicly-assisted housing by size and children	Does publicly-supported housing serve families with children, who often need larger units?
Table 13 Disability by Type	Index that measures access to good schools, jobs, transportation, neighborhoods with clear air. A higher index value is always better.	Use to evaluate where different types of residents live compared to access to good schools, jobs, transportation, and clean air
Table 14 Disability by Age Group	Types of disabilities that residents report	What types of housing and services are needed to serve persons with disabilities?
Table 15 Disability by Publicly Supported Housing Program Category	Age of persons with disabilities	What types of housing and services are needed to serve persons with disabilities—especially children, people of working age, seniors?
Table 16 Homeownership and Rental Rates by Race/Ethnicity	Occupants of publicly-assisted housing by disability	Is public housing serving people with disabilities?
	Homeownership rates by race and Hispanic descent	Do some groups have lower homeownerships? Starting point to determine why.

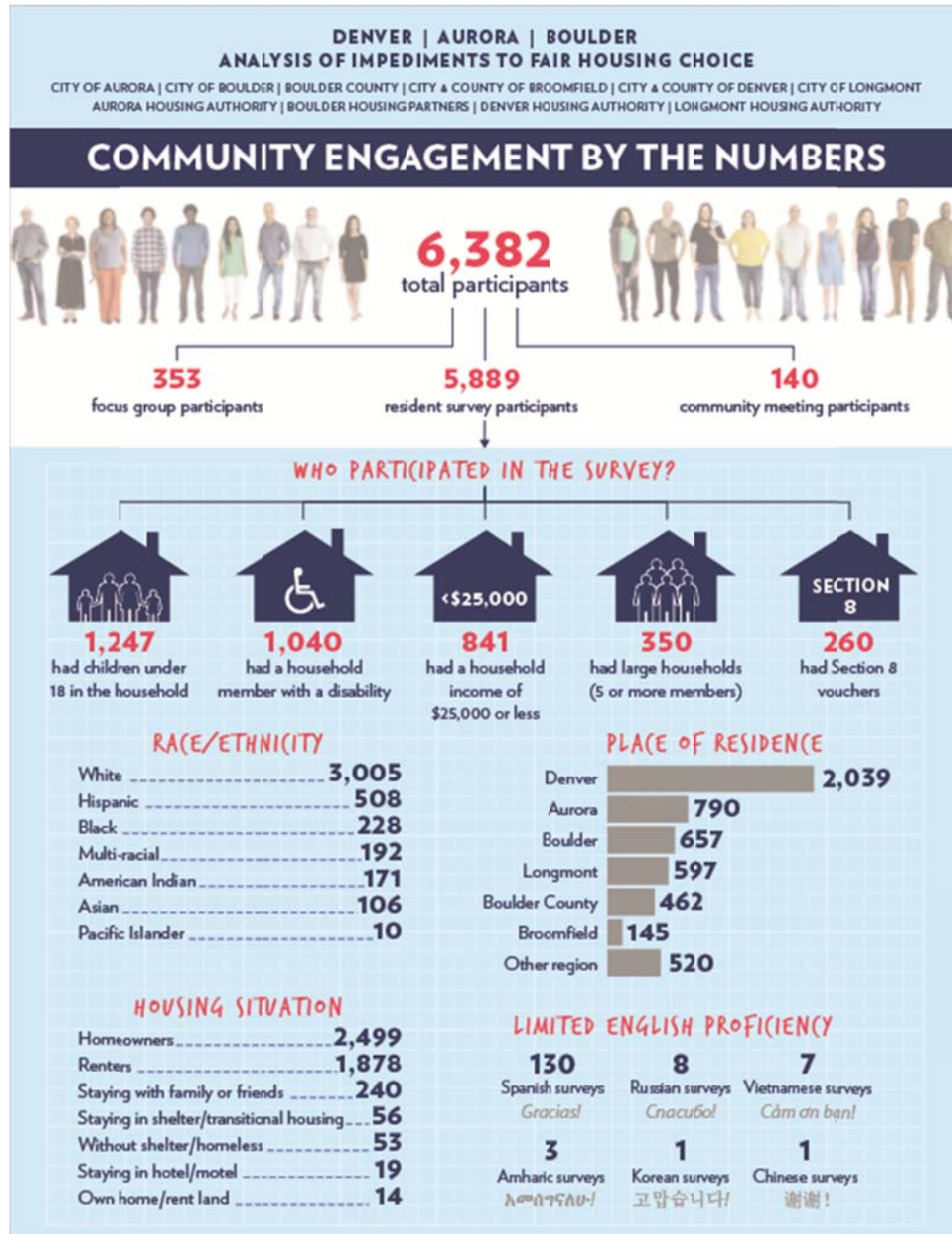
APPENDIX C.

Resident Survey Findings

APPENDIX C.

Resident Survey Findings

The Regional AI community engagement process included stakeholder and resident focus groups, resident events and a resident survey. This section reports the findings from the resident survey. Appendix D includes summaries from the resident focus groups.



Geographic note. Throughout this section, survey data for Boulder County *excludes* responses from residents of the cities of Boulder and Longmont. Data for the Region includes all survey respondents, including those living in nearby communities and counties outside of the participating jurisdictions' borders.

Sample size note. When considering the experience of members of certain protected classes living some sample sizes are too small (n<25 respondents) to express results quantitatively. In these cases, we describe the survey findings as representative of those who responded to the survey, but that the magnitude of the estimate may vary significantly in the overall population (i.e., large margin of error). Survey data from small samples are suggestive of an experience or preference, rather than conclusive. Sample sizes and response distributions for respondent demographic and socioeconomic characteristics by jurisdiction are found at the end of the section.

Current Housing Choice

This section explores residents' housing preferences, including the factors most important to them when they chose their current housing; their desire to move; and their experience with housing challenges.

Most important factors in choosing current home. In each jurisdiction and across all demographic and socioeconomic categories, "cost/I could afford it" is the most important factor for choosing a resident's current home. Liking the neighborhood, proximity to employment, the layout of the home and simply being available were the other top five factors to regional residents. Access to bus/light rail stops is important to African American, Asian, and Native American residents, households that include a member with a disability and respondents with Limited English Proficiency (LEP). Number of bedrooms is very important to households with large families, and a low crime rate/safe is among the top five factors for African American and Native American residents.

Figure C-1.
Most Important Factors in Choosing Current Home, Jurisdiction

	Aurora	Denver	Boulder	Boulder County	Broomfield	Longmont	Region
What are the three factors that were most important to you in choosing your current home or apartment in your community? (Top 5 Factors)							
1	Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it
2	Type of home/layout of home	2 Like the neighborhood	2 Close to work/job opportunities	2 Like the neighborhood	2 Close to quality public schools	2 Like the neighborhood	2 Like the neighborhood
3	Close to work/job opportunities	3 Close to work/job opportunities	3 Like the neighborhood	3 Close to family/friends	3 Like the neighborhood	3 Type of home/layout of home	3 Close to work/job opportunities
4	Like the neighborhood	4 Walkable/bikeable area	4 Walkable/bikeable area	4 Close to work/job opportunities	4 Type of home/layout of home	4 Close to work/job opportunities	4 Type of home/layout of home
5	Close to quality public schools	5 Close to bus/light rail stops	5 Close to parks and open space	5 Low crime rate/safe	5 Close to work/job opportunities	5 Needed somewhere to live and it was available	5 Needed somewhere to live and it was available

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Figure C-2.
Most Important Factors in Choosing Current Home, Protected Classes

	African American	Asian	Hispanic	Native American	Non-Hispanic White	Disability	Large Families	LEP
What are the three factors that were most important to you in choosing your current home or apartment in your community? (Top 5 Factors)								
1	Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it	1 Cost/I could afford it
2	Like the neighborhood	2 Close to work/job opportunities	2 Close to work/job opportunities	2 somewhere to live and it was available	2 Like the neighborhood	2 somewhere to live and it was available	2 somewhere to live and it was available	2 Close to bus/light rail stops
3	Close to work/job opportunities	3 Close to bus/light rail stops	3 Needed somewhere to live and it was available	3 Like the neighborhood	3 Close to work/job opportunities	3 Like the neighborhood	3 Like the neighborhood	3 Needed somewhere to live and it was available
4	Close to bus/light rail stops	4 Like the neighborhood	4 Like the neighborhood	4 Close to work/job opportunities	4 Layout of home	4 Close to work/job opportunities	4 Number of bedrooms	4 Like the neighborhood
5	Low crime rate/safe (tie)	5 Layout of home	5 Close to family/friends	5 Close to bus/light rail stops (tie)	5 Walkable/bikeable area	5 Close to bus/light rail/transit stops	5 Close to work/job opportunities	5 Close to quality public schools
5	Number of bedrooms (tie)		5 Low crime rate/safe (tie)					

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Desire to move. Regionally, nearly two in five residents (38%) would move if they had the opportunity to do so.

Why do residents want to move? Having a bigger home or apartment is the top reason for wanting to move among Aurora residents, while buying a home ranks first among Denver, Boulder, Boulder County and Longmont residents. The primary reason Broomfield residents want to move is to save money. Among members of protected classes, homeownership is the top reason for wanting to move, followed by a larger home or apartment.

Why haven't they moved yet? Regardless of place of residence, those who want to move but have not stay in their current home because they "can't afford to live anywhere else" and they "can't pay moving expenses/deposits." Rounding out the top five factors are:

- Can't find a better place to live;
- Rentals are all full; can't find a place to rent; and
- Job is here.

The top five reasons for not yet moving among members of protected classes are similar to those of residents regionally with a few exceptions. "Landlords don't take Section 8" is the fourth highest mentioned factor among African Americans. "Have submitted applications, but haven't secured housing" is the fifth reason for not moving among residents with disabilities and households with incomes less than \$25,000. LEP residents are less likely to move because their "family/friends are here."

**Figure C-3.
Desire to Move by Jurisdiction**

	Aurora	Denver	Boulder	Boulder County	Broomfield	Longmont	Region
Percent who would move given the opportunity							
	41%	34%	43%	35%	34%	39%	38%
Why would you like to move? (Top 5 Reasons)							
1	Bigger house/apartment	1 Want to buy a home	1 Want to buy a home	1 Want to buy a home	1 Save money/get something less expensive	1 Want to buy a home	1 Want to buy a home
2	Want to move to different	2 Bigger house/apartment	2 Bigger house/apartment	2 Get something less expensive	2 Want to buy a home	2 Bigger house/apartment	2 Bigger house/apartment
3	Want to buy a home	3 Get something less expensive	3 Get something less expensive	3 Bigger house/apartment	3 Bigger house/apartment	3 Get something less expensive	3 Get something less expensive
4	Crime/safety reasons	4 Want to move to different neighborhood	4 Want to move to different neighborhood	4 Get own place/live with fewer people	4 Closer to work	4 Get own place/live with fewer people	4 Want to move to different neighborhood
5	Want to move to different city/country (tie)	5 Crime/safety reasons	5 Get own place/live with fewer people	5 Closer to work	5 Want to move to different city/country	5 Want to move to different neighborhood	5 Get own place/live with fewer people
5	Get something less expensive (tie)						
Why haven't you moved yet? (Top 5 Reasons)							
1	Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else	1 Can't afford to live anywhere else
2	Can't pay moving expenses/deposits	2 Can't pay moving expenses/deposits	2 Can't find a better place to live	2 Can't pay moving expenses/deposits	2 Can't pay moving expenses/deposits	2 Can't pay moving expenses/deposits	2 Can't pay moving expenses/deposits
3	Can't find a better place to live	3 Can't find a better place to live	3 Can't pay moving expenses/deposits	3 Can't find a better place to live	3 Can't find a better place to live	3 Can't find a better place to live	3 Can't find a better place to live
4	Rentals are all full; can't find a place to rent	4 Rentals are all full; can't find a place to rent	4 Job is here	4 Rentals are all full; can't find a place to rent	4 Rentals are all full; can't find a place to rent	4 Job is here	4 Rentals are all full; can't find a place to rent
5	Job is here	5 Job is here	5 Rentals are all full; can't find a place to rent	5 Have submitted applications, but haven't secured housing	5 Need to find a new job	5 Rentals are all full; can't find a place to rent	5 Job is here

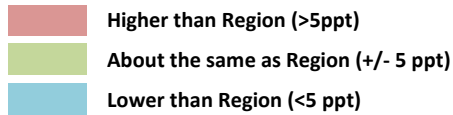
Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Housing challenges. Figure C-5 compares the housing challenges residents experience by jurisdiction and for the region. Nearly three in four renters worry about their rent going up to an amount they cannot afford; a similar rate in all jurisdictions, highest in Broomfield. More than seven in 10 Denver Section 8 voucher holders and 48 percent in Aurora worry that their landlord will stop accepting Section 8. This is much less likely to be a concern among Boulder, Longmont and Boulder County voucher holders.

Figure C-6 compares the rates of housing challenges experienced by members of protected classes and low income households with the region. As shown, challenges experienced vary by protected class. Some of the housing challenges experienced at rates higher than the region by members of protected classes include:

- **I worry about my rent going up to an amount I can't afford.** Higher for Hispanic, Asian and Native American residents, large families and LEP respondents;
- **I want to buy a house but can't afford the down payment.** Higher for African American, Hispanic and Asian residents; families with children, and large families.
- **I worry that if I request a repair it will result in a rent increase or eviction.** Higher for Asian and Native American residents and large families;
- **My landlord refuses to make repairs despite my requests.** Higher for Asian residents and large families.

Figure C-5.
Top 10 Housing Challenges Experienced by Residents



Percent of Residents Experiencing a Housing Challenge	Aurora	Denver	Boulder	Boulder County	Broomfield	Longmont	Region
I worry about my rent going up to an amount I can't afford	73%	74%	73%	70%	100%	73%	74%
I want to buy a house but can't afford the down payment	68%	69%	62%	40%	79%	58%	64%
I have Section 8 and I am worried my landlord will stop accepting Section 8	46%	71%	16%	12%	-	26%	49%
I worry that if I request a repair it will result in a rent increase or eviction	23%	19%	15%	13%	18%	24%	19%
Too much traffic/too much street/highway noise	18%	21%	17%	12%	15%	18%	18%
I have bad/rude/loud neighbors	19%	15%	16%	11%	13%	12%	15%
Inadequate sidewalks, street lights, drainage, or other infrastructure in my neighborhood	13%	21%	6%	9%	5%	6%	13%
No or few grocery stores/healthy food stores in the area	11%	20%	5%	11%	6%	7%	13%
High crime in my neighborhood	13%	20%	3%	2%	4%	6%	11%
My house or apartment isn't big enough for my family members	10%	11%	15%	11%	9%	12%	11%
My landlord refuses to make repairs despite my requests	13%	11%	12%	6%	6%	13%	11%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	17%	11%	3%	0%	11%	9%	10%

Note: - Sample size too small to report.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Figure C-6. Housing Challenges Experienced by Residents who are Members of Protected Classes, Income and Regional Residents

Percent of Residents Experiencing a Housing Challenge	Protected Classes										
	African American	Hispanic	Asian	Native American	Non-Hispanic White	Disability	Children Under 18	Large Family	LEP	Income <\$25,000	Region
I worry about my rent going up to an amount I can't afford	67%	80%	83%	80%	74%	79%	78%	81%	81%	69%	74%
I want to buy a house but can't afford the down payment	74%	72%	90%	69%	64%	45%	83%	92%	45%	41%	64%
I have Section 8 and I am worried my landlord will stop accepting Section 8	38%	51%	-	33%	46%	45%	51%	30%	-	39%	49%
I worry that if I request a repair it will result in a rent increase or eviction	23%	22%	27%	29%	18%	24%	24%	33%	23%	14%	19%
Too much traffic/too much street/highway noise	10%	22%	19%	26%	20%	21%	20%	20%	12%	17%	18%
I have bad/rude/loud neighbors	19%	20%	13%	27%	15%	19%	17%	16%	19%	20%	15%
Inadequate sidewalks, street lights, drainage, or other infrastructure in my neighborhood	14%	18%	13%	19%	15%	15%	16%	15%	9%	11%	13%
No or few grocery stores/healthy food stores in the area	23%	18%	18%	22%	14%	16%	15%	18%	15%	15%	13%
High crime in my neighborhood	11%	19%	10%	18%	12%	14%	13%	12%	5%	13%	11%
My house or apartment isn't big enough for my family members	21%	25%	11%	13%	10%	16%	23%	34%	32%	18%	11%
My landlord refuses to make repairs despite my requests	12%	12%	17%	14%	9%	15%	12%	18%	8%	8%	11%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	15%	11%	17%	30%	11%	12%	18%	27%	6%	20%	10%

Note: - Sample size too small to report.

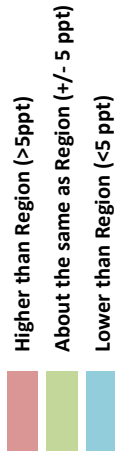
Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Disability-related housing challenges. With the exception of residents of Boulder, households with a member with a disability are as likely to experience disability-related housing challenges regionally as they are in their place of residence. Boulder residents with disabilities are more likely to experience disability-related housing challenges than similar households elsewhere. Regionally, disability-related housing challenges experienced by residents include:

- One in five “worry if I request an accommodation for my disability my rent will go up or I will be evicted;”
- More than one in 10 (13%) cannot afford the housing that has accessibility feature needed.

Boulder households that include a member with a disability are significantly more likely to have a landlord refuse to make an accommodation or modification, refuse a therapy/emotional support animal and refuse a service animal than those living elsewhere in the region.

**Figure C-7.
Housing Challenges Experienced by Residents with Disabilities**



Percent of Residents Experiencing a Housing Challenge	Boulder					Region
	Aurora	Denver	Boulder	Broomfield	Longmont	
I worry if I request an accommodation for my disability my rent will go up or I will be evicted	27%	21%	31%	9%	-	23%
I can't afford the housing that has accessibility features (e.g., grab bars, ramps, location, size of unit, quiet) we need	14%	10%	18%	8%	9%	18%
I have a disability or a household member has a disability and cannot get around the neighborhood because of broken sidewalks/no sidewalks/poor street lighting	10%	14%	14%	10%	0%	8%
My landlord refused to make an accommodation for me or my household member's disability	8%	11%	21%	4%	-	4%
My landlord refused to accept my therapy/companion/emotional support animal	5%	6%	22%	3%	-	7%
My landlord refused to make a modification (e.g., grab bar, ramp, etc.) for my or my household member's disability	10%	9%	14%	1%	-	4%
My landlord refused to accept my service animal	3%	3%	17%	1%	-	2%

Note: - Sample size too small to report.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Displacement & Recent Experience Seeking Housing

This section explores residents' experience seeking a place to rent or buy in the region and the extent to which displacement—having to move when they do not want to move—is prevalent.

Displacement experience. The survey provides some information on how residents have been affected by displacement. To better understand the extent of displacement in the region, resident survey respondents answered a series of questions related to displacement, beginning with the question, “In the past five years, have you had to move out of a home or apartment in the Denver Metro Area when you did not want to move?” Overall, one in three current renters (30%) and 43 percent of residents who are currently precariously housed¹ who responded to the resident survey have experienced displacement—having to move when they did not want to move—in the past five years in the region. Two in five (42%) renters currently living in Aurora and nearly half of current renters in Broomfield (48%) who participated in the survey experienced displacement in the past five years, the highest rates among regional renters.²

Experience with displacement also varied by respondent demographic and socioeconomic characteristics. Those with higher displacement rates than the regional rate (19%) include:

- Nearly two in five (37%) Section 8 voucher holders;
- Nearly three in ten (29%) households that include a member with a disability;
- Households with incomes less than \$25,000 (28%);
- African American (27%), Native American (27%) and Hispanic (26%) residents;
- More than one in four (27%) large families; and
- More than one in four (26%) households with household incomes of \$25,000 up to \$50,000.

Figure C-8 presents the share of a population who experienced displacement and the proportion of those populations impacted by: rent increased more than could be paid; evicted for being behind on the rent; and landlord selling the home.

The greatest proportion of renters with displacement experience (41%) had to move because “rent increased more than I could pay.” As discussed previously, “landlord selling the home” was a factor for 20 percent of renters who experienced displacement. Eviction was a factor for one in ten (10%) current renters and 17 percent of the precariously housed. Regionally, “personal reasons” such as changes in household composition resulting from changes in personal

¹ For the purposes of survey analysis, respondents are considered “precariously housed” if they are staying with friends or family but are not on the lease or property title; staying in a shelter or transitional housing; staying in a motel/hotel or other temporary housing situation; or are without shelter, experiencing homelessness.

² It is important to note that the displacement experience did not necessarily occur in the respondent’s current community of residence.

relationships are factors in 16 percent of displacements. Reasons for displacement vary by respondent demographic and socioeconomic characteristics.

- Households most likely to be displaced due to the rent increasing more than could be paid are households with incomes ranging from \$25,000 up to \$50,000 (50%) and large families (48%).
- Households most likely to be displaced due to being evicted for being behind on the rent are large families (15%), Native American residents (13%) and households with incomes less than \$25,000 (13%).

Households most likely to be displaced due to the landlord selling the home are households with incomes greater than \$100,000 (31%), Asian residents (29%), African American residents (25%) and households with Section 8 vouchers (25%).

The greatest proportion of renters with displacement experience (41%) had to move because “rent increased more than I could pay.” As discussed previously, “landlord selling the home” was a factor for 20 percent of renters who experienced displacement. Eviction was a factor for one in 20 (5%) current renters and 17 percent of the precariously housed.

Figure C-8.
Displacement Experience and Reasons for Displacement by Jurisdiction Overall, Current Renters
and Those Precariously Housed or Homeless

Place of Current Residence	Percent Displaced	Reason for Displacement		
		Rent Increased More Than I Could Pay	Evicted: Behind on the Rent	Landlord Selling Home
Aurora	20%	40%	5%	30%
Renters	42%	40%	5%	35%
Precariously housed/homeless	26%	30%	30%	13%
Denver	19%	43%	6%	18%
Renters	30%	44%	4%	20%
Precariously housed/homeless	49%	43%	17%	6%
Boulder	18%	31%	6%	17%
Renters	24%	33%	3%	12%
Precariously housed/homeless	49%	26%	17%	13%
Boulder County	20%	45%	7%	12%
Renters	21%	51%	7%	9%
Precariously housed/homeless	34%	35%	18%	17%
Broomfield	21%	50%	0%	12%
Renters	46%	42%	0%	16%
Precariously housed/homeless	-	-	-	-
Longmont	16%	30%	10%	13%
Renters	28%	27%	12%	12%
Precariously housed/homeless	46%	44%	17%	0%
Region	19%	41%	6%	19%
Renters	30%	41%	5%	20%
Precariously housed/homeless	43%	42%	17%	8%

Note: Displacement did not necessarily occur within current community of residence. - Sample size too small to report.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Figure C-9.
Displacement Experience and Reasons for Displacement by Selected Protected Class Characteristics and Household Income

	Percent Displaced	Reason for Displacement		
		Rent Increased More than I Could Pay	Evicted: Behind on Rent	Landlord Selling Home
Race/ethnicity				
African American	27%	41%	7%	25%
Asian	14%	36%	7%	29%
Hispanic	26%	38%	8%	20%
Native American	27%	37%	13%	15%
Non-Hispanic White	17%	42%	5%	20%
LEP				
LEP	16%	42%	11%	0%
Children under 18				
Children under 18	21%	42%	9%	23%
Large family				
Large family	27%	48%	15%	20%
Disability				
Disability	29%	37%	10%	13%
Section 8				
Section 8	37%	28%	7%	25%
Household Income				
Less than \$25,000	28%	33%	13%	13%
\$25,000 up to \$50,000	26%	50%	4%	20%
\$50,000 up to \$100,000	19%	43%	3%	22%
\$100,000 or more	8%	35%	1%	31%

Note: Displacement did not necessarily occur within current community of residence.

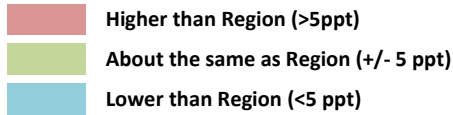
Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Recent experience seeking housing. Overall, nearly two-thirds of survey respondents seriously looked for housing in the region in the past five years. To understand their search experience, respondents answered several questions related to challenges they may have encountered in the process of renting or buying a home. These housing provider actions—unreturned phone or email inquiries; being told a unit was available by phone, but unavailable when the applicant arrived in person; loan denial or being charged higher interest rates; steering by real estate agents—may suggest housing discrimination. Residents’ experience with these housing provider actions did not vary by place of current residence, but they did vary by race or ethnicity, disability, family size and English proficiency. Compared to other residents:

- Native Americans and those with a disability are less likely to have their emails to landlords inquiring about units returned;
- African American, Native American and residents with disabilities are less likely to have their phone calls to landlords inquiring about units returned;
- African American, Native American, residents with disabilities, and those with household incomes less than \$25,000 were more likely to be told a unit was available by phone but unavailable when they arrived in person;

- African American residents and large families are more likely to have been denied a home loan, and Asian residents and large families are more likely to say they were charged a high interest rate for their home loan;
- LEP residents were more likely to have a real estate agent only show them homes in neighborhoods where most people were of their same race or ethnicity.

Figure C-10.
Experience Looking for Housing in Aurora, Denver, Boulder, Boulder County, Broomfield, Longmont, and Region in the Past Five Years by Jurisdiction

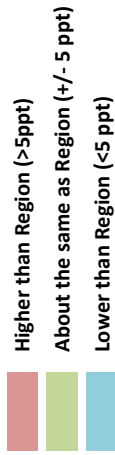


Percent of Residents Experiencing in Recent Housing Search	Aurora	Denver	Boulder	Boulder County	Broomfield	Longmont	Region
Respondents who seriously looked for housing in the region in the past five years	68%	68%	67%	69%	66%	59%	66%
Landlord did not return emails asking about a unit	12%	17%	18%	20%	13%	15%	17%
Landlord did not return calls asking about a unit	15%	17%	15%	14%	12%	15%	16%
I was told the unit was available over the phone, but when I showed up in person, the landlord told me it was no longer available	10%	9%	9%	10%	12%	11%	10%
A bank or other lender would not give me a loan to buy a home	10%	7%	10%	10%	12%	9%	9%
A bank or other lender charged me a high interest rate on my home loan	4%	4%	5%	4%	7%	3%	4%
I requested a disability accommodation for myself or my family and it was not made	2%	1%	2%	4%	2%	2%	2%
The real estate agent only showed me homes in neighborhoods where most people were of my same race or ethnicity	3%	3%	4%	4%	2%	1%	3%

Note: Includes only those respondents who seriously looked for housing in the past five years. Experience with housing provider occurred in the region, but not necessarily in the resident's current community.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Figure C-11. Experience Looking for Housing in the Past Five Years by Selected Protected Class Characteristics and Household Income



Percent of Residents Experiencing a Housing Challenge	Non-Hispanic					Disability	Children Under 18	Large Family	LEP	Income <\$25,000	Region
	African American	Asian	Hispanic	Native American	White						
Respondents who seriously looked for housing in the region in the past five years	70%	56%	69%	62%	65%	66%	69%	69%	89%	69%	66%
Landlord did not return emails asking about a unit	20%	5%	20%	30%	17%	24%	16%	21%	13%	21%	17%
Landlord did not return calls asking about a unit	26%	7%	19%	28%	16%	24%	16%	23%	10%	23%	16%
I was told the unit was available over the phone, but when I showed up in person, the landlord told me it was no longer available	17%	11%	12%	25%	9%	17%	10%	16%	11%	16%	10%
A bank or other lender would not give me a loan to buy a home	15%	14%	14%	18%	8%	14%	14%	8%	10%	8%	9%
A bank or other lender charged me a high interest rate on my home loan	6%	11%	8%	5%	3%	7%	6%	4%	9%	4%	4%
I requested a disability accommodation for myself or my family and it was not made	4%	2%	3%	8%	1%	7%	2%	6%	4%	6%	2%
The real estate agent only showed me homes in neighborhoods where most people were of my same race or ethnicity	6%	7%	5%	3%	2%	3%	4%	4%	9%	4%	3%

Note: Experience with housing provider occurred in the region, but not necessarily in the resident's current community.
 Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Denial of housing to rent or buy. As shown in the previous figure, about two-thirds of survey respondents seriously looked for housing to rent or buy in the past five years. Among these residents, one in five were denied housing to rent or buy. The top two most frequently reported reasons for their housing denial experience are “income too low” and “bad credit.” Among members of protected classes, these are also the top two reasons for housing denial. For members of protected classes, remainder of the top five reasons for denial differ from other residents. These include:

- **I have Section 8/Housing Choice Voucher.** Top five reason for African American and Hispanic residents, large families, and households with incomes less than \$25,000.
- **Size of my family/household.** Top five reason for Hispanic residents, large families, and LEP respondents.
- **Landlord didn't accept social security or disability income.** Top five reason for Native American residents, households with a member with a disability, and households with incomes less than \$25,000.
- **Service animal, assistance animal, therapeutic animal.** Top five reason for Native American residents.
- **I have children.** Top five reason for African American residents.
- **Foreclosure history, immigration status, and unable to provide required documentation.** Top five factors for LEP residents.
- **Criminal history and race/ethnicity.** Top five reasons for residents with disabilities.

Figure C-12.
When you looked for housing in Aurora, Denver, Boulder, Boulder County, Broomfield, Longmont, or the region in the past five years, were you ever denied housing to rent or buy? Why were you denied? By Jurisdiction of Current Residence

	Aurora	Denver	Boulder	Boulder County	Broomfield	Longmont	Region
Percent denied housing to rent or buy in the region in the past five years	26%	18%	21%	27%	28%	24%	22%
Why were you denied housing to rent or buy? (Top 5 Reasons)							
1	Income too low	Income too low	Income too low	Income too low	Income too low	Income too low	Income too low
2	Bad credit	Bad credit	Bad credit	Bad credit	Other buyer offered a higher price	Bad credit	Bad credit
3	I have Section 8/Housing Choice voucher	Other renter/ applicant willing to pay more for rent	Other person willing to pay more for rent	Other person willing to pay more for rent	Other willing to pay more for rent	Other person willing to pay more for rent	Other renter/ applicant willing to pay more for rent
4	Other buyer offered a higher price	Other buyer offered a higher price	Landlord didn't allow pets	Other buyer offered a higher price	Bad credit	Landlord didn't allow pets	Other buyer offered a higher price
5	Other renter/ applicant willing to pay more for rent	Other buyer offered to pay cash	Other buyer offered a higher price	Landlord didn't allow pets	Other buyer offered to pay cash	Other buyer offered a higher price	Other buyer offered to pay cash

Note: Experience of housing denial occurred in the region but not necessarily in the place of current residence.
 Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Figure C-13. When you looked for housing in Aurora, Denver, Boulder County, Broomfield, Longmont, or the region in the past five years, were you ever denied housing to rent or buy? Why were you denied? By Protected Class

	African American	Asian	Hispanic	Native American	Non-Hispanic White	Disability	Large Family	LEP	Income < \$25,000
Percent denied housing to rent or buy in the region in the past five years									
	37%	23%	33%	35%	19%	38%	37%	25%	36%
Why were you denied housing to rent or buy? (Top 5 Reasons)									
1	Income too low	1	Income too low	1	Income too low	1	Income too low	1	Income too low
2	Bad credit	2	Bad credit	2	Bad credit	2	Bad credit	2	Bad credit
3	I have Section 8/Housing Choice voucher	3	Other applicant willing to pay more for rent	3	Lack of stable housing record	3	Size of my family/household	3	I have Section 8/Housing Choice voucher
4	Other applicant willing to pay more for rent	4	I have Section 8/Housing Choice voucher	4	Service animal, assistance animal, or therapeutic animal	4	Other applicant willing to pay more for rent	4	Landlord didn't accept social security or disability benefit income
5	I have children	5	Landlord didn't allow pets (tie)	5	Because I am homeless (tie)	5	I have Section 8/Housing Choice voucher	5	Other applicant willing to pay more for rent

Note: - Sample size too small to report. Experience of housing denial occurred in the region but not necessarily in the place of current residence.
 Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

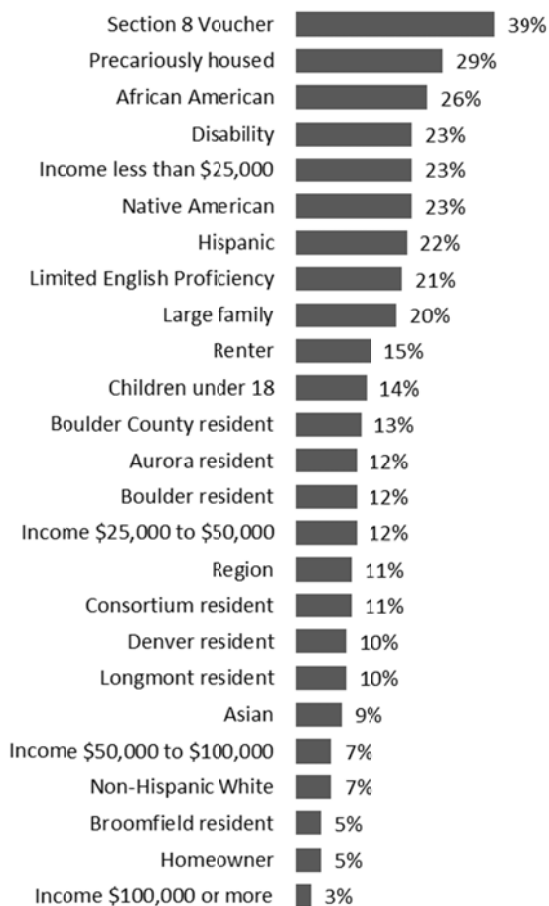
Experience with housing discrimination. Survey respondents were asked, “When you looked for housing in the region, did you ever feel you were discriminated against?” Overall, 11 percent of survey respondents felt they were discriminated against when they looked for housing in the region. The proportion of residents who believe they experienced housing discrimination varies widely, from nearly two in five (39%) Section 8 voucher holders to 3 percent of respondents with household incomes of \$100,000 or more. About one in four African American residents, residents with disabilities, Native American residents and Hispanic residents felt they experienced housing discrimination.

Figure C-14.
When you looked for housing in the region, did you ever feel you were discriminated against?

Note: Experience with housing discrimination occurred in the region, but not necessarily in the place of current residence.

Source:

BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.



Overall, the top reasons residents believe they were discriminated against are:

- Race or ethnicity (22%);
- Income too low (15%);
- Section 8 (10%);
- Disability (8%);
- Familial status/having children (8%);
- Past evictions (5%); and
- LGBT (4%).

Neighborhood and Community

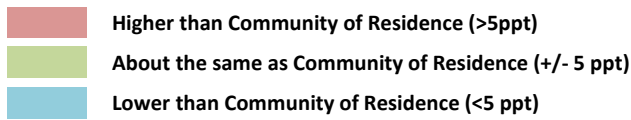
Fair housing choice is more than just choice in a home, it is also about access to opportunity, including proficient schools, employment, transportation, services, and other community amenities that contribute to quality of life. This section explores a number of measures of access to opportunity including equal treatment of all residents, the extent to which residents would welcome different types of people moving to their neighborhood, access to public services, healthy neighborhood indicators, and access to proficient schools, employment and transportation. We conclude with an analysis of indicators of Not-In-My-Backyard (NIMBY) attitudes that may impact land use and planning decisions related to housing.

Equal treatment of residents. Overall, 60 percent of respondents agree that “all residents in the area where you live are treated equally or the same as residents of other areas in your community.” Residents *less likely* than other members of their community to agree with that statement are shown in blue in the following figure. These include:

- African American residents of Aurora, Denver and Consortium communities;
- Asian residents of Aurora;
- Hispanic residents of Denver, Boulder County and Longmont;
- Native American residents of Denver and Boulder;
- Large families living in Denver, Boulder, Boulder County, and Longmont;
- Households with a member with a disability living in every jurisdiction;
- Households with incomes less than \$25,000 living in Aurora, Denver and Longmont; and
- Households with incomes of \$25,000 up to \$50,000 living in Aurora, Denver and Boulder County.

Figure C-15.

Do you feel that all residents in the area where you live are treated equally or the same as residents of other areas in your community? (% Yes)



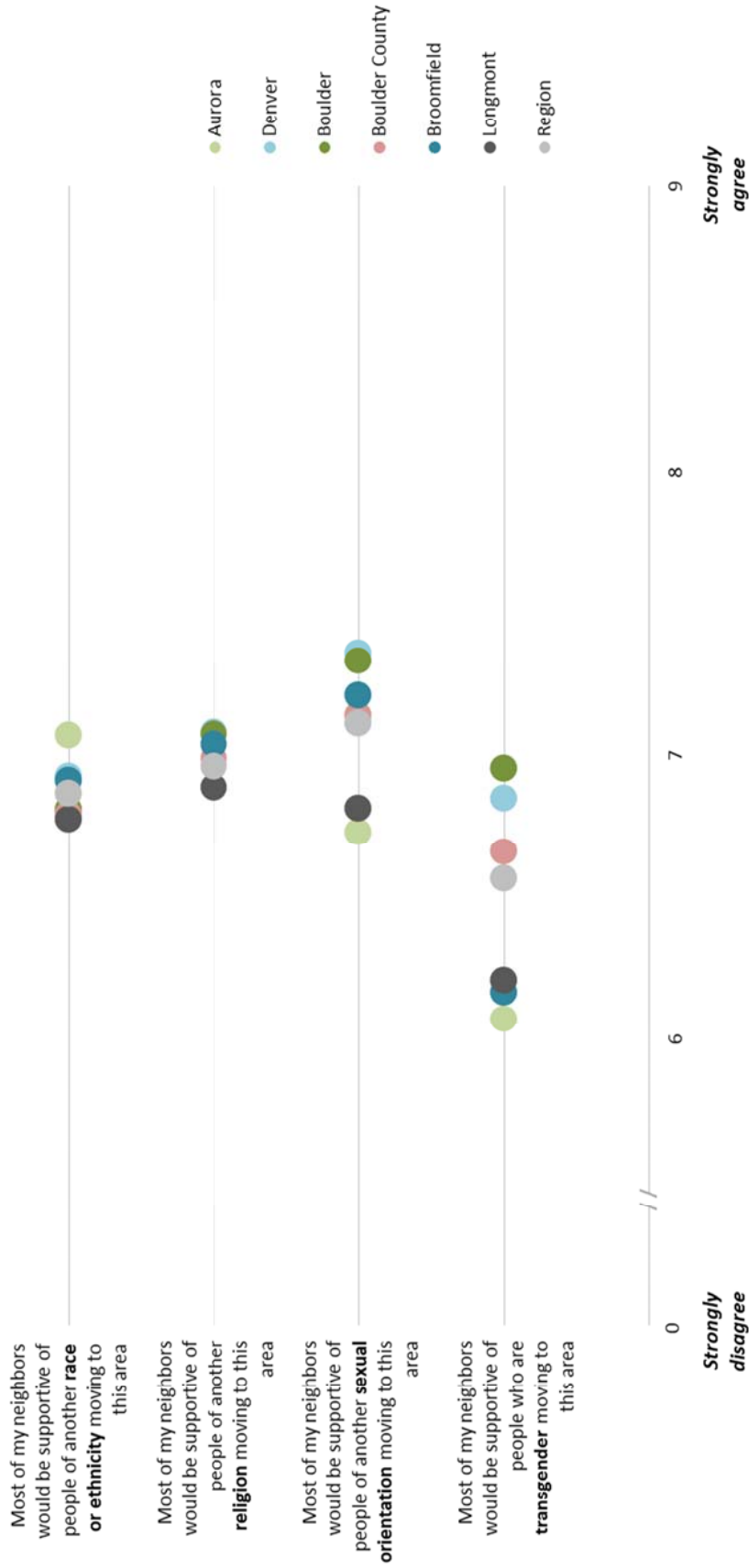
	Aurora	Denver	Boulder	Broomfield	Boulder County	Longmont	Consortium	Region
All residents	57%	57%	64%	76%	67%	67%	67%	60%
Race/ethnicity								
African American	46%	31%	-	-	-	-	36%	-
Asian	48%	68%	-	-	-	-	65%	59%
Hispanic	61%	41%	63%	-	61%	52%	58%	48%
Native American	67%	24%	43%	-	-	-	49%	38%
White	62%	63%	68%	78%	71%	70%	70%	65%
LEP	-	64%	70%	-	-	-	62%	61%
Children under 18	56%	55%	66%	86%	64%	66%	67%	59%
Large family	52%	47%	51%	73%	57%	60%	58%	50%
Disability	46%	42%	45%	57%	61%	52%	52%	46%
Section 8	41%	40%	23%	-	57%	-	40%	39%
Household Income								
Less than \$25,000	42%	45%	63%	-	63%	45%	52%	48%
\$25,000 up to \$50,000	48%	48%	64%	-	58%	67%	63%	54%
\$50,000 up to \$100,000	63%	58%	71%	83%	74%	71%	72%	63%
\$100,000 or more	65%	70%	78%	86%	79%	83%	81%	73%

Note: - - indicates insufficient data.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Respondents rated their level of agreement with a series of statements on a scale of 0-9 where a rating of 0 means strongly disagree and a rating of 9 means strongly agree. Each statement began with “Most of my neighbors would be supportive of people of another...” followed by “race or ethnicity,” “religion,” “sexual orientation” or “who are transgender.” As shown, most respondents, regardless of where they live, agree that most of their neighbors would be supportive of these different types of people moving to the area. While still being supportive, the degree of agreement with support is slightly lower for people who are transgender than for race or ethnicity, religion or sexual orientation. Although still supportive, Aurora and Longmont residents are slightly less supportive of people of a different sexual orientation, and Aurora, Longmont and Broomfield residents are slightly less supportive of people who are transgender moving into the area, compared to residents of other communities.

Figure C-16.
Most of my neighbors would be supportive of people of another ... race or ethnicity, or religion or sexual orientation or who are transgender ... moving to this area.



Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Healthy neighborhood indicators. Figure C-17 presents perspectives on a number of healthy neighborhood indicators, including quality of neighborhood parks and recreation facilities, access to grocery stores, access to health care facilities, condition of neighborhood housing stock, crime, and having a supportive network of friends and family in the area. In the regional comparison, Broomfield residents are most likely have access to grocery stores, health care facilities, housing in good condition and lower crime. Denver residents are least likely to think park and recreation facilities are of the same quality across neighborhoods, are less likely to have convenient access to grocery stores, more likely to think housing in their neighborhood is in good condition and to have higher crime than other neighborhoods.

Access to these healthy neighborhood indicators varies across indicators and among members of protected classes and low income households. Access to health food and health care facilities are rated more highly than having the same quality of park and recreation facilities as found in other neighborhoods, housing condition and crime.

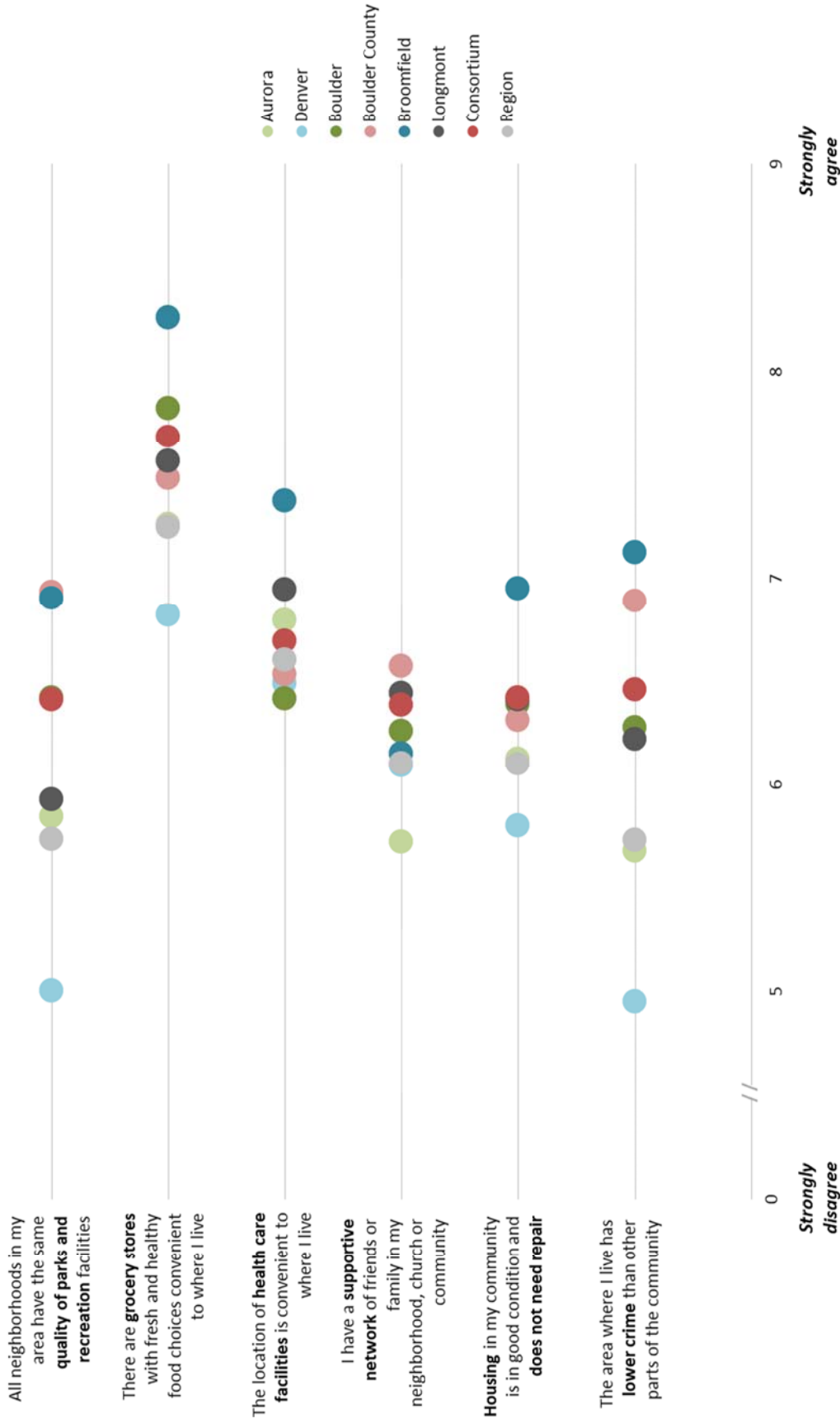
With respect to helping the person with a disability in their household receive better health services, the top answers involved:

- *Access to transportation;*
- Affordable health insurance; and
- Doctors willing to accept Medicare or Medicaid.

Needed in order to improve access to community amenities, facilities or services such as parks, libraries, government buildings, cultural facilities and festivals/events are:

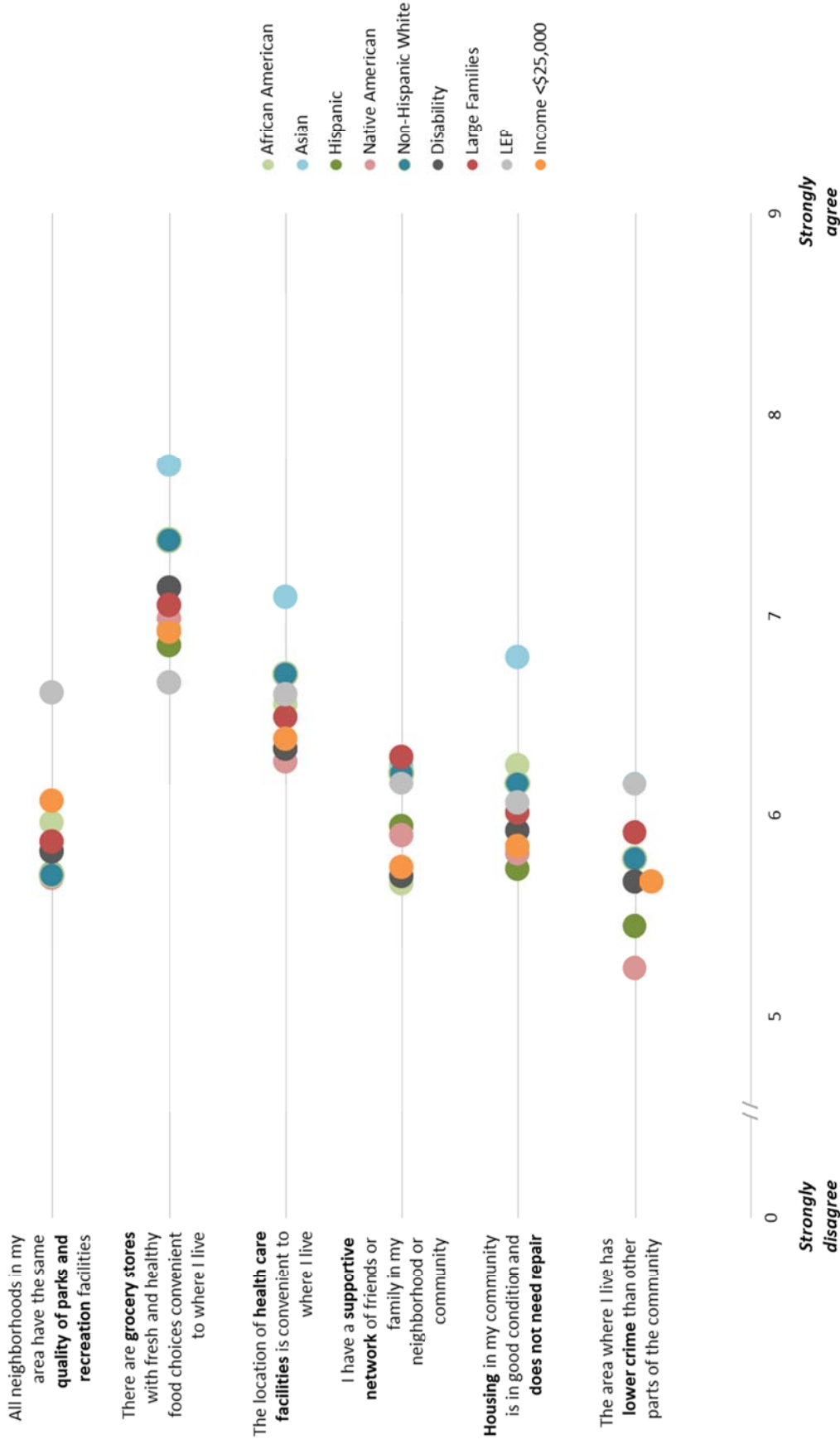
- Access to transportation;
- ADA accessibility;
- Outreach to the disability community to alert them to opportunities to participate; and
- Accessible parking.

Figure C-17.
Resident Perspectives on Healthy Neighborhood Indicators, by Jurisdiction



Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Figure C-18.
Resident Perspectives on Healthy Neighborhood Indicators, by Selected Protected Classes and Low Income Households

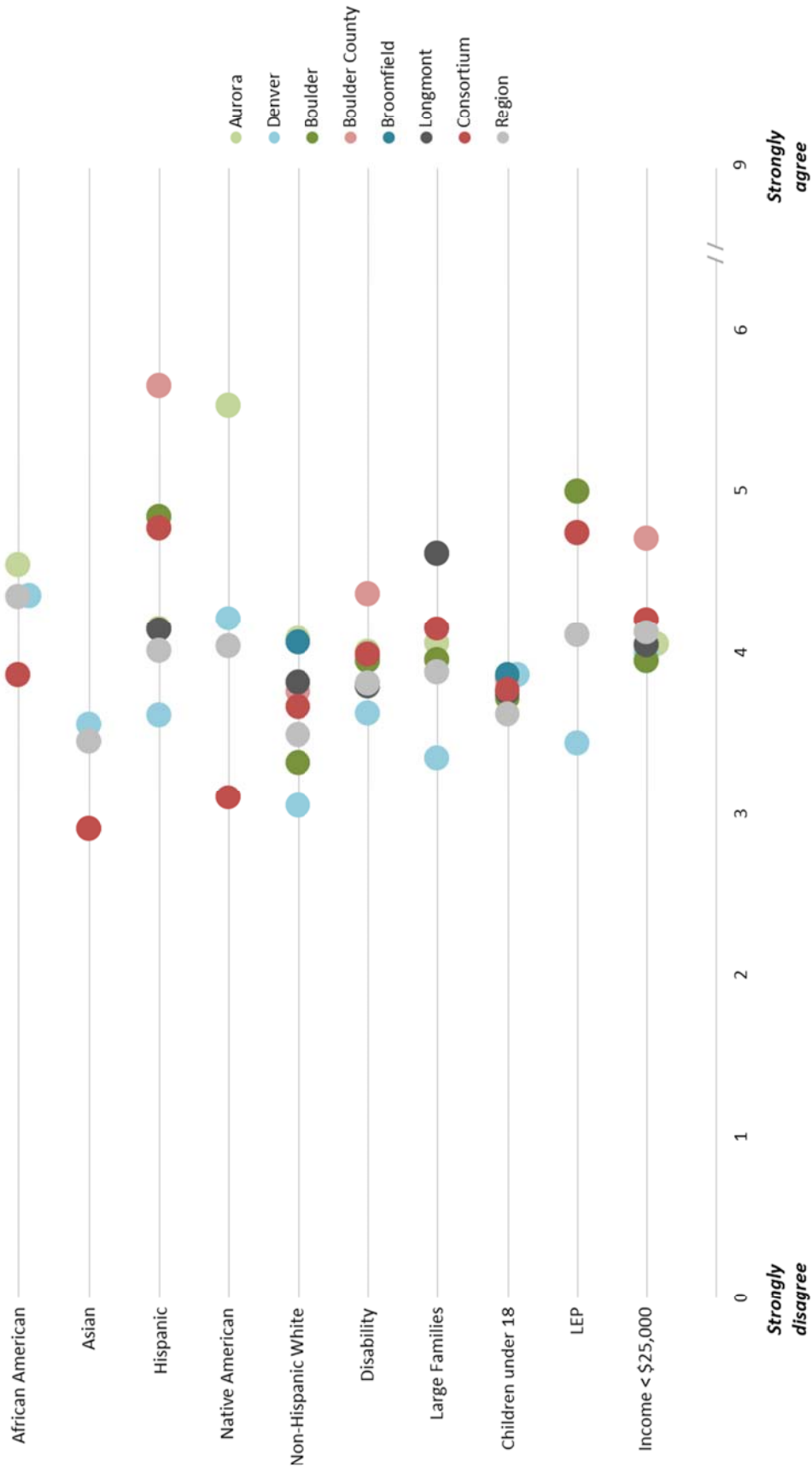


Note: Not all groups had sufficient responses to report.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Access to quality schools. Respondents to the resident survey for the regional AI affirm the challenges associated with housing affordability and accessing quality schools. Figure C-19 presents the average degree of agreement with the statement, “In this area, it is easy to find housing people can afford that is close to good schools,” by jurisdiction for members of selected protected classes and low income residents. As shown, most residents disagree that it is easy to find affordable housing near quality schools; the extent of disagreement varies both geographically and among protected class groups. Compared to other groups, Hispanics living in Boulder County and Native Americans living in Aurora are more likely to agree that it is easy to find affordable housing close to good schools. Regardless of where they live, respondents with household incomes less than \$25,000 find it difficult to find affordable housing near good schools.

Figure C-19.
Access to Quality Schools by Jurisdiction and Selected Protected Class Characteristics and Low Income Households
In this area it is easy to find housing people can afford that is close to good quality schools.



Note: Not all groups had sufficient responses to report.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Access to transportation. Resident survey respondents rated their satisfaction with their transportation situation on a scale from 0-9 where 0="extremely unsatisfied" and 9="extremely satisfied." Average satisfaction with transportation among respondents is 6.5, more satisfied than not. Among the jurisdictions, resident satisfaction with their transportation situation ranged from 6.3 among Denver and Boulder County residents to 6.8 among Aurora residents. Native American residents have lower satisfaction with their transportation situation than other racial or ethnic groups.

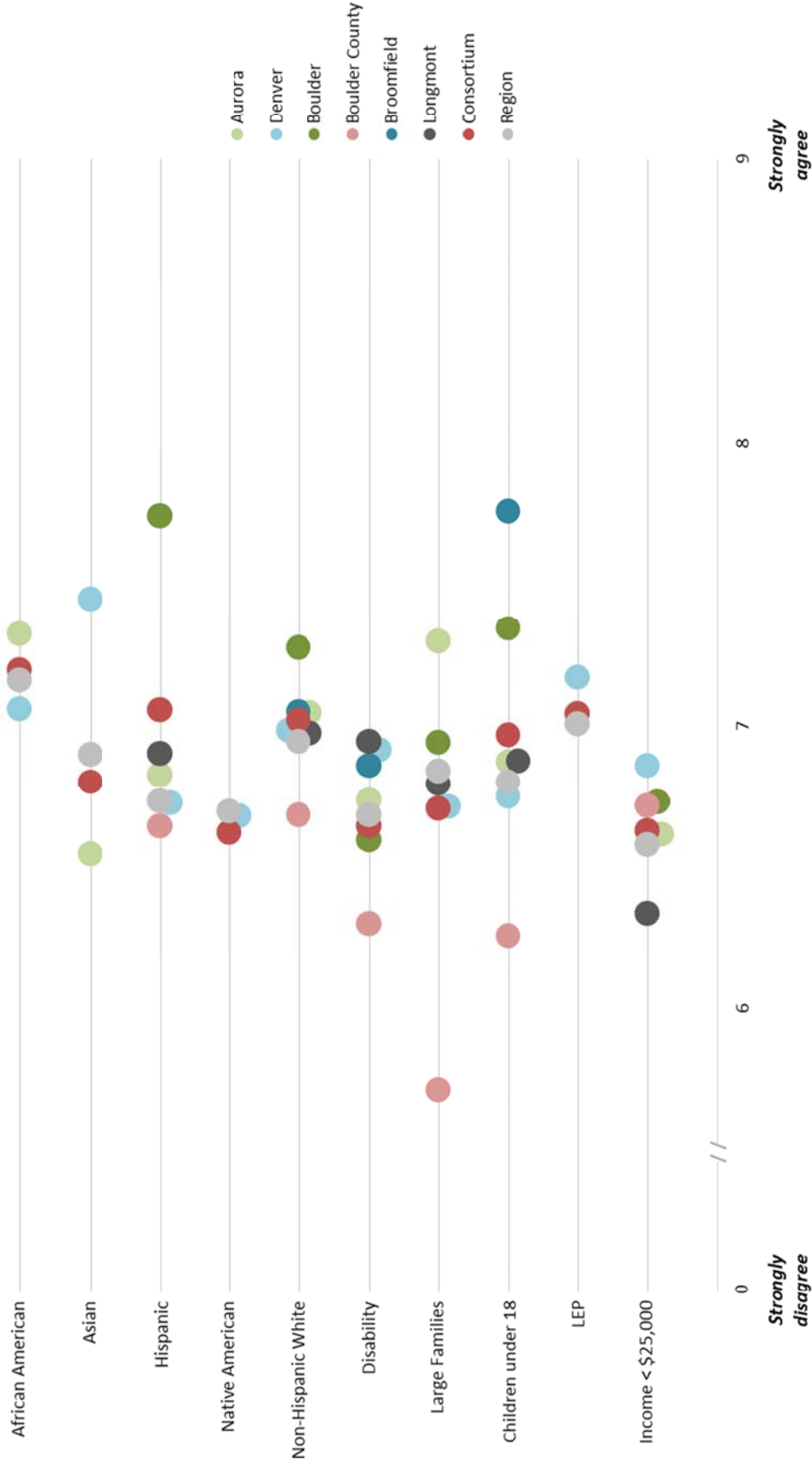
Not surprisingly, satisfaction with transportation situation varied by the type of transportation used most often. Regionally, residents who drive their own vehicle are somewhat more satisfied than those who rely on public transit. Paratransit users are least satisfied.

Average satisfaction with their transportation situation among public transit users is similar to transportation satisfaction overall (6.2 versus 6.5). Boulder transit users had the highest satisfaction (6.8) and Longmont the lowest (5.5). Compared to the regional average, Native American (5.6), African American (5.7), Asian (5.7), and disability (5.8) transit users had lower average satisfaction.

Too few paratransit users from jurisdictions other than Denver participated in the survey to draw comparisons.

Figure C-20 presents residents' degree of agreement with the statement, "I can easily get to the places I want to go using my preferred transportation option for members of selected protected classes and low income households by jurisdiction. In general, residents somewhat agreed with the statement, but widely across groups and jurisdictions.

Figure C-20.
Access to Transportation, by Jurisdiction and Selected Protected Class Characteristics and Low Income Households
I can easily get to the places I want to go using my preferred transportation option.



Note: * Data for Harris County exclude residents of the participating jurisdictions and Houston. Not all groups had a sufficient number of responses to report results.
 Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Access to employment. Two survey questions directly addressed the linkage between employment and housing. One, in the context of housing challenges, asked if there were “not enough job opportunities in the area.” Overall, less than one in 10 respondents in the region (7%) identified “not enough job opportunities in the area” as a challenge; this proportion is similar across all of the participating jurisdictions. This rate does vary demographically.

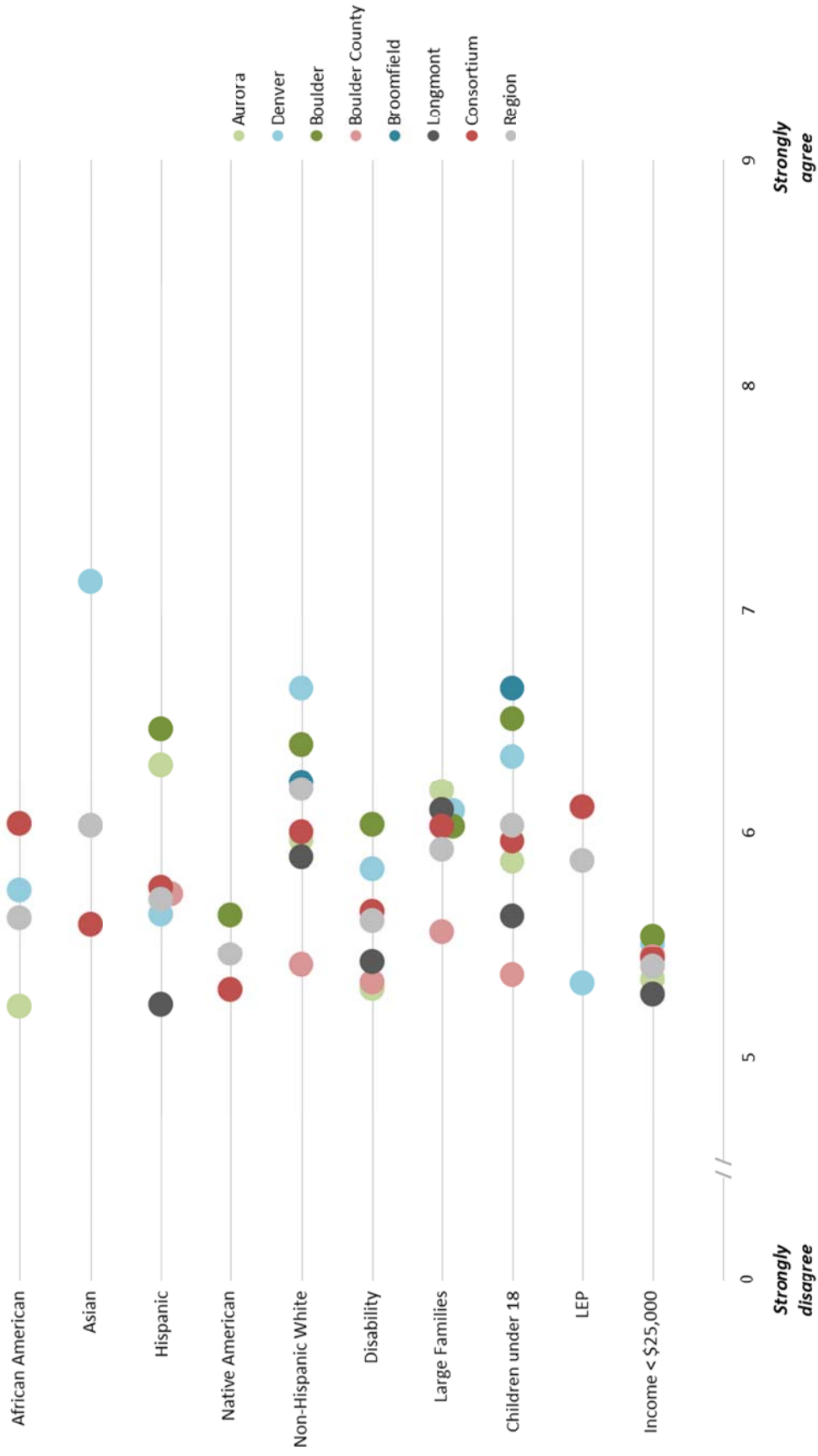
- Native American residents (15%), Asian residents (13%), African American residents (12%), Hispanic residents (12%), households that include a member with a disability (11%), large families (11%), households with incomes less than \$25,000 (10%), are *more* likely to have this challenge than the average regional resident;
- LEP residents (5%) are *less* likely to experience this challenge

To understand the linkage between access to employment and housing, survey respondents rated their level of agreement with the statement, “The location of job opportunities is convenient to where I live.” Figure C-21 presents this data by jurisdiction for members of selected protected classes and low income residents. As shown most residents, on average, somewhat agree that job locations are close to where they live. For African Americans, this is lowest in Aurora and highest in the Consortium communities. Proximity of jobs to home is lowest for Hispanics living in Longmont and highest for Boulder Hispanics. There is little variation by community for households with incomes less than \$25,000.

Access to transportation is a persistent barrier experienced by residents with disabilities when seeking employment or a better job. When asked, “What is most needed to help the person with a disability in your household to get a job or a better job?” the most frequently mentioned recommendations are:

- *Access to transportation;*
- Employment training, coaching, and education;
- Outreach to employers to encourage them to hire people with disabilities;
- Mental health services;
- ADA accessibility accommodations in the workplace; and
- Sidewalk improvements for connectivity to employment opportunities.

Figure C-21.
Access to Employment, by Jurisdiction and Selected Protected Class Characteristics and Low Income Households
The location of job opportunities is convenient to where I live.

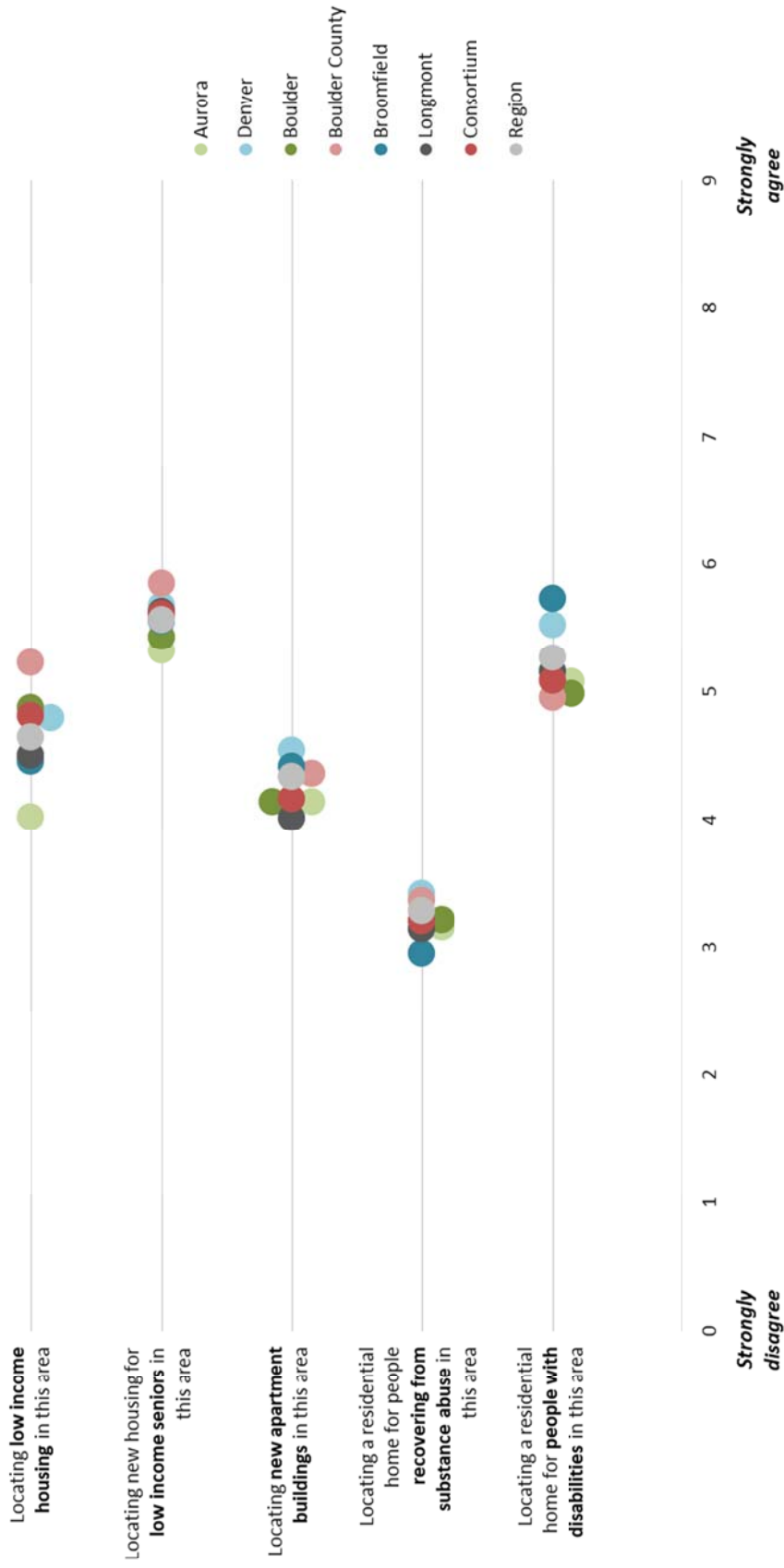


Note: Not all groups had sufficient responses to report.
 Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

NIMBY. To understand how residents perceive their neighborhood would respond to locating different types of housing and uses, survey respondents rated the likelihood that “most of my neighbors would support locating...” a particular housing type or use. With respect to neighbor support for various types of housing and housing uses, there is little variation among survey respondent by place of residence. In general, residents have lukewarm support for locating low income housing “in this area”, less support for locating new apartment buildings and the least support for housing for people recovering from substance abuse. While still tepid, residents are more supportive of locating new housing for low income seniors and for people with disabilities in their area.

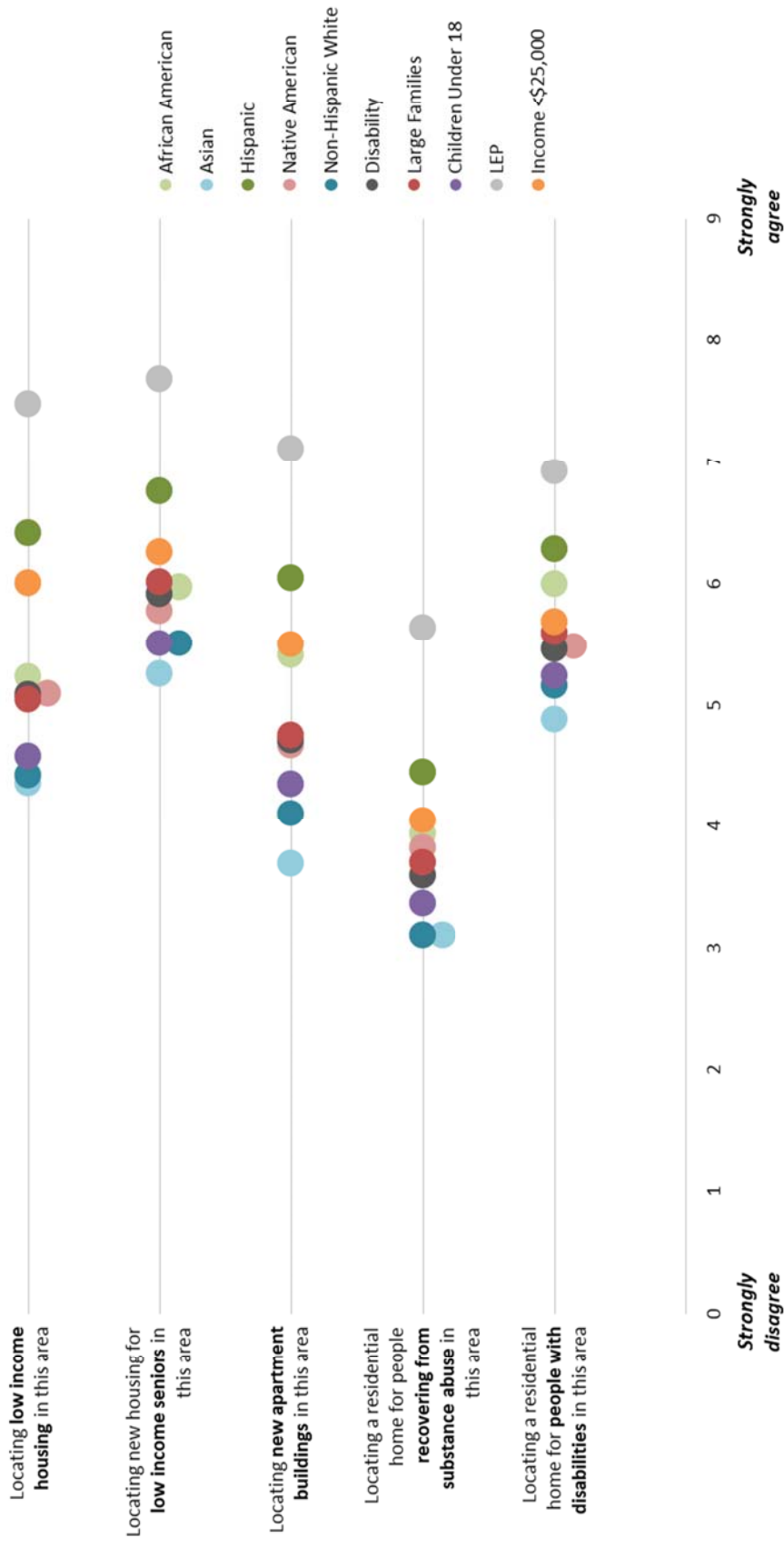
Compared to the average community resident, members of protected classes are both more and less likely to support different types of housing and housing uses in locating in their neighborhood. In general, LEP residents tend to be most supportive of different housing types and uses and Asian and non-Hispanic White residents are least supportive, followed by households with a member with a disability. As with regional residents, members of protected classes and low income households are least likely to think their neighbors would be supportive of locating a home for people recovering from substance abuse.

Figure C-22.
Most of my neighbors would be supportive of locating...low income housing...housing for low income seniors...new apartment buildings...a residential home for people recovering from substance abuse... a residential home for people with disabilities ... in this area. By Jurisdiction



Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Figure C-23. Most of my neighbors would be supportive of locating...low income housing...housing for low income seniors...new apartment buildings...a residential home for people recovering from substance abuse... a residential home for people with disabilities ... in this area. By Selected Protected Class Characteristics and Low Income Households



Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Survey Respondent Characteristics

The following figures present sample sizes and respondent characteristics by their community of residence.

Figure C-24.
Survey Respondent Characteristics

Survey Respondent Characteristics	Aurora	Denver	Boulder	Boulder County	Broomfield	Longmont	Consortium	Region
Race/ethnicity								
Non-Hispanic White	63%	68%	74%	74%	79%	76%	75%	70%
African American	13%	6%	3%	2%	1%	1%	2%	5%
Hispanic	10%	14%	8%	11%	4%	11%	10%	12%
Asian	3%	2%	3%	1%	5%	2%	2%	2%
Native Hawaiian/ Pacific Islander	0%	0%	0%	0%	3%	0%	0%	0%
Native American	3%	4%	4%	4%	1%	4%	4%	4%
Multi-racial	6%	5%	4%	2%	3%	3%	3%	4%
<i>Number of respondents (n=)</i>	<i>649</i>	<i>1,698</i>	<i>551</i>	<i>364</i>	<i>104</i>	<i>505</i>	<i>1,524</i>	<i>4,258</i>
Disability								
	25%	20%	26%	31%	21%	26%	27%	24%
<i>Number of respondents (n=)</i>	<i>649</i>	<i>1,698</i>	<i>551</i>	<i>364</i>	<i>104</i>	<i>505</i>	<i>1,524</i>	<i>4,258</i>
Income								
Less than \$5,000	6%	5%	5%	4%	1%	5%	5%	5%
\$5,000 up to \$9,999	2%	4%	6%	9%	1%	5%	6%	4%
\$10,000 up to \$14,999	4%	3%	6%	10%	5%	3%	6%	4%
\$15,000 up to \$19,999	2%	2%	4%	8%	2%	4%	5%	3%
\$20,000 up to \$24,999	3%	2%	6%	8%	4%	9%	7%	4%
\$25,000 up to \$34,999	8%	7%	11%	15%	7%	7%	10%	8%
\$35,000 up to \$49,999	14%	14%	16%	10%	11%	11%	12%	13%
\$50,000 up to \$74,999	22%	18%	18%	13%	17%	17%	16%	18%
\$75,000 up to \$99,999	14%	12%	10%	6%	11%	14%	10%	12%
\$100,000 up to \$149,999	17%	17%	12%	9%	15%	15%	12%	15%
\$150,000 or more	8%	15%	8%	8%	25%	10%	10%	12%
<i>(n=)</i>	<i>600</i>	<i>1,565</i>	<i>514</i>	<i>343</i>	<i>92</i>	<i>448</i>	<i>1,397</i>	<i>3,923</i>

Note: n=number of respondents.

Numbers may add to greater than 100% for some characteristics due to multiple response.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Figure C-25.
Survey Respondent Characteristics (Continued)

Survey Respondent Characteristics	Boulder							
	Aurora	Denver	Boulder	County	Broomfield	Longmont	Consortium	Region
Household type								
Living alone	16%	24%	32%	35%	23%	21%	28%	24%
Living with roommates/friends	3%	7%	9%	6%	4%	4%	6%	6%
Living with spouse/partner	30%	34%	21%	23%	31%	30%	25%	29%
Living with spouse/partner and children	27%	19%	18%	17%	24%	25%	21%	22%
Living with children (no other adults)	9%	6%	10%	7%	4%	6%	8%	7%
Living with children and roommates/friends	1%	1%	0%	0%	2%	2%	1%	1%
Living with children and other adult family members	3%	2%	2%	4%	2%	3%	3%	3%
Living with other adult family members	5%	3%	3%	3%	6%	4%	4%	4%
Living with spouse/partner and roommates/friends	0%	1%	1%	1%	1%	1%	1%	1%
Living with spouse/partner and other adult family members	4%	1%	1%	2%	1%	2%	1%	2%
Living with spouse/partner, children and roommates/friends	1%	1%	1%	0%	0%	1%	1%	1%
Living with spouse/partner, children and other adult family members	2%	1%	1%	2%	1%	2%	1%	1%
<i>Number of respondents (n=)</i>	<i>594</i>	<i>1,552</i>	<i>512</i>	<i>327</i>	<i>95</i>	<i>461</i>	<i>1,395</i>	<i>3,889</i>
Children								
Household includes child under age 18	36%	27%	31%	27%	29%	33%	30%	31%
<i>(n=)</i>	<i>619</i>	<i>1,612</i>	<i>530</i>	<i>346</i>	<i>95</i>	<i>474</i>	<i>1,145</i>	<i>4,035</i>
Large families								
Households with five or more members	13%	6%	8%	7%	11%	9%	8%	9%
<i>(n=)</i>	<i>622</i>	<i>1,619</i>	<i>532</i>	<i>348</i>	<i>97</i>	<i>477</i>	<i>1,454</i>	<i>4,058</i>

Note: n=number of respondents.

Numbers may add to greater than 100% for some characteristics due to multiple response.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Figure C-26.
Survey Respondent Characteristics (Continued)

Survey Respondent Characteristics	Boulder							
	Aurora	Denver	Boulder	County	Broomfield	Longmont	Consortium	Region
Housing Situation								
Homeowner	65%	53%	44%	37%	58%	59%	48%	53%
Renter	29%	40%	49%	52%	32%	34%	44%	39%
Staying with friends or family (not on lease or property title)	4%	4%	4%	8%	8%	3%	5%	5%
Staying in a shelter or transitional housing	0%	2%	1%	0%	2%	1%	1%	1%
Staying in a motel/hotel or other temporary housing situation	0%	0%	1%	0%	1%	0%	0%	0%
I am without shelter, experiencing homelessness	0%	1%	2%	2%	0%	2%	2%	1%
<i>Number of respondents (n=)</i>	<i>718</i>	<i>1,870</i>	<i>590</i>	<i>410</i>	<i>130</i>	<i>555</i>	<i>1,685</i>	<i>4,719</i>
Housing Type								
Single family home/house	63%	48%	29%	43%	65%	64%	46%	51%
Townhome/duplex/triplex/fourplex	16%	16%	18%	16%	5%	10%	14%	15%
Apartment in an apartment building	12%	24%	23%	24%	23%	19%	22%	21%
Condo unit in a condo building	7%	8%	20%	4%	3%	2%	9%	8%
Mobile home/manufactured home	1%	0%	5%	5%	2%	1%	3%	1%
Retirement community	1%	0%	1%	2%	1%	0%	1%	1%
Independent living/assisted living	0%	0%	1%	2%	0%	1%	1%	1%
Hotel/motel	0%	0%	0%	0%	1%	0%	0%	0%
Homeless shelter	0%	2%	1%	0%	0%	1%	0%	1%
On the street/camping/sleeping in car/experiencing homelessness	0%	1%	2%	2%	0%	1%	2%	1%
Room in a home/apt	0%	0%	0%	0%	1%	1%	0%	0%
ADU	0%	0%	1%	1%	0%	1%	1%	0%
<i>(n=)</i>	<i>712</i>	<i>1,855</i>	<i>593</i>	<i>409</i>	<i>128</i>	<i>548</i>	<i>1,678</i>	<i>4,688</i>
When Moved to or Year Born in Region								
Before 1950	2%	1%	1%	2%	5%	1%	2%	1%
1950 to 1959	4%	3%	2%	5%	3%	3%	3%	3%
1960 to 1969	6%	5%	3%	5%	5%	7%	5%	5%
1970 to 1979	12%	9%	9%	10%	5%	7%	8%	9%
1980 to 1989	17%	13%	12%	13%	14%	13%	13%	13%
1990 to 1999	15%	13%	17%	15%	16%	17%	17%	15%
2000 to 2010	17%	20%	23%	23%	21%	22%	23%	21%
2010-2017	27%	37%	32%	27%	31%	28%	30%	32%
<i>(n=)</i>	<i>610</i>	<i>1,567</i>	<i>520</i>	<i>329</i>	<i>95</i>	<i>460</i>	<i>1,404</i>	<i>3,927</i>

Note: n=number of respondents.

Numbers may add to greater than 100% for some characteristics due to multiple response.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.

Figure C-27.
Survey Respondent Characteristics (Continued)

Survey Respondent Characteristics	Boulder							
	Aurora	Denver	Boulder	County	Broomfield	Longmont	Consortium	Region
Transportation Types Used Most Often								
Drive personal vehicle	93%	82%	87%	91%	98%	94%	91%	88%
Drive with someone else/get a ride with someone else	14%	15%	16%	19%	10%	18%	17%	16%
Drive company vehicle	3%	1%	1%	1%	3%	1%	1%	2%
Take public transit — bus, light rail	20%	43%	41%	30%	17%	18%	29%	33%
Take a combination of personal vehicle and public transit—park-and-ride	8%	10%	10%	11%	12%	8%	10%	10%
Walk	17%	46%	47%	32%	18%	32%	37%	36%
Bike	9%	26%	40%	16%	8%	17%	25%	22%
Use taxi/Uber/Lyft	9%	33%	14%	7%	9%	6%	9%	19%
Paratransit/Access-a-Ride	1%	1%	2%	3%	2%	2%	2%	2%
Use specialized transportation service —senior center	0%	0%	1%	2%	1%	0%	1%	1%
<i>Number of respondents (n=)</i>	<i>598</i>	<i>1,565</i>	<i>513</i>	<i>331</i>	<i>93</i>	<i>457</i>	<i>1,394</i>	<i>3,907</i>
Employment								
Employed full-time	58%	66%	50%	39%	52%	49%	47%	58%
Employed part-time	8%	9%	13%	13%	9%	11%	12%	10%
Self-employed	7%	9%	14%	12%	2%	8%	11%	9%
Temporary work/odd jobs	1%	3%	2%	2%	0%	1%	1%	2%
Unemployed/looking for work	5%	3%	3%	4%	0%	6%	4%	4%
Homemaker/stay-home parent	5%	3%	4%	2%	6%	5%	4%	4%
Retired	17%	10%	17%	29%	30%	21%	22%	15%
Disability benefit	5%	5%	7%	11%	3%	6%	7%	6%
Full-time student	3%	3%	3%	2%	3%	2%	2%	3%
<i>(n=)</i>	<i>598</i>	<i>1,565</i>	<i>513</i>	<i>331</i>	<i>93</i>	<i>457</i>	<i>1,394</i>	<i>3,907</i>
Age								
18 to 24	3%	3%	3%	2%	2%	2%	3%	3%
25 to 34	18%	31%	20%	12%	17%	14%	16%	23%
35 to 44	24%	27%	20%	18%	16%	21%	20%	24%
45 to 54	19%	17%	18%	12%	16%	18%	17%	17%
55 to 64	19%	13%	17%	18%	17%	23%	19%	16%
65 or older	17%	10%	21%	38%	31%	21%	26%	17%
<i>(n=)</i>	<i>598</i>	<i>1,565</i>	<i>513</i>	<i>331</i>	<i>93</i>	<i>457</i>	<i>1,394</i>	<i>3,907</i>

Note: n=number of respondents.

Numbers may add to greater than 100% for some characteristics due to multiple response.

Source: BBC Research & Consulting from the 2017 Denver-Aurora-Boulder Regional AFH Resident Survey.