City of Arvada
Housing Authority Agenda

JULY 1, 2025
ANNUAL MEETING

Councilmembers:
Lauren Simpson, Mayor
Randy Moorman, Mayor Pro-Tem
Shawna Ambrose, District 2
Sharon Davis, At large
Bob Fifer, District 4
John Marriott, District 3
Brad Rupert, At large

Staff Members Usually Present:
Don Wick, City Manager
Linda Haley, Deputy City Manager
Rachel Morris, City Attorney
Jacqueline Rhoades, Director of Public Works
Jessica Garner, Director of Community & Econ. Dev.
Bryan Archer, Director of Finance
Gabriella Bommer, Director of Human Resources
Ryan Stevenson, Director of Vibrant Community & Neighborhoods
Rachael Kuroiwa, Director of Communications & Engagement
Ed Brady, Chief of Police
Kristen Rush, City Clerk

Info: 720-898-7550

CITY COUNCIL CHAMBERS
6:00 PM

I. Call to Order

II. Roll Call

III. Approval of Minutes
   1. January 6, 2025 Housing Authority Special Meeting

IV. Public Comment

V. Reports of Secretary

VI. Reports of Committees

VII. Unfinished Business

VIII. New Business
   1. Arvada Housing Authority 2025 Administrative Plan Updates
   2. Arvada Housing Authority 2026 Annual Plan
   3. The 2024-2025 Arvada Housing Authority Annual Report

IX. Adjourn

SUMMARY OF THE MINUTES OF THE SPECIAL MEETING OF THE ARVADA HOUSING AUTHORITY HELD JANUARY 6, 2025

I. CALL TO ORDER - by Chairperson Simpson at 6:00 p.m.

II. ROLL CALL OF MEMBERS

Those present: Chairperson Lauren Simpson, Chair Pro Tem Randy Moorman, Commissioner Commissioner Sharon Davis, Commissioner Bob Fifer Commissioner John Marriott, Commissioner Brad Rupert.

Commissioner Fifer moved to excuse Commissioner Ambrose from the meeting.

The following votes were cast on the Motion:
Those voting Yes: Simpson, Moorman, Davis, Fifer, Marriott, Rupert
Those Absent: Ambrose
The motion was Approved.

Also present: Linda Haley, Interim City Manager; Don Wick, Deputy City Manager; Rachel Morris, City Attorney; Carrie Espinoza, Housing and Homelessness Program Manager; Katie Patterson, Communications Manager, Infrastructure and Kristen Rush, City Clerk

III. APPROVAL OF MINUTES – November 4, 2024

The minutes stand approved.

IV. PUBLIC COMMENT – none

V. REPORTS OF THE SECRETARY - none

VI. REPORTS OF COMMITTEES – none

VII. UNFINISHED BUSINESS – none

VIII. NEW BUSINESS

1. R-HA-25-01 A Resolution Authorizing the Arvada Housing Authority to Loan Marshall Pointe Apartments, LP $850,000 to Assist in Financing an Affordable Housing Development to be Known as Marshall Pointe Apartments

Carrie Espinosa, Secretary for the Arvada Housing Authority, reviewed this resolution with the Authority.

Vice Chair Moorman moved that R-HA-25-01, A Resolution Authorizing the Arvada Housing Authority to Loan Marshall Pointe Apartments, LP $850,000 to Assist in Financing an Affordable Housing Development to be Known as Marshall Pointe Apartments, be approved.

The following votes were cast on the Motion:
Those voting Yes: Simpson, Moorman, Davis, Fifer, Rupert
Those voting No: Marriott
Those Absent: Ambrose
The motion was Approved.

2. R-HA-25-02 A Resolution Authorizing the Arvada Housing Authority to Enter Into a Limited Partnership Agreement as a Special Limited Partner for the Marshall Pointe Affordable Housing Development

Carrie Espinosa, Secretary for the Arvada Housing Authority, reviewed this resolution with the Authority.

Commissioner Fifer moved that R-HA-25-02, A Resolution Authorizing the Arvada Housing Authority to Enter Into a Limited Partnership Agreement as a Special Limited Partner for the Marshall Pointe Affordable Housing Development, be approved.

The following votes were cast on the Motion:
Those voting Yes: Simpson, Moorman, Davis, Fifer, Rupert
Those voting No: Marriott
Those Absent: Ambrose
The motion was Approved.

IX. ADJOURN at 6:50 p.m.

____
Lauren Simpson, Chairperson

____
Carrie Espinosa, Secretary, Housing Authority

CITY OF ARVADA

REPORT TO HOUSING AUTHORITY

AGENDA ITEM VIII.1.

TO: THE HONORABLE CITY COUNCIL DATE: July 1, 2025

SUBJECT: Arvada Housing Authority 2025 Administrative Plan Updates

Report in Brief

PRESENTER: Carrie Espinosa

The Housing team is proposing updates to the Housing Choice Voucher Program Administrative Plan to take effect July 1, 2025. The team recommends a variety of updates to comply with new or revised HUD regulations and updates.

The proposed revisions are summarized in the attachments, referencing their location in the Administrative Plan. The Administrative Plan is not attached due to its volume; however, it is available for review by the Board and the public upon request.

Financial Impact

There is no fiscal impact related to this request.

Background

The Arvada City Council established itself as the Arvada Housing Authority (AHA) in 1975. The goal of the AHA is to provide, through the use of Housing Choice Voucher (HCV) Program subsidies, safe, decent, sanitary and affordable housing for low income families. The HCV program is funded by the federal government and administrated by the AHA. AHA enters into an Annual Contributions Contract with HUD to administer the program requirements on behalf of HUD. The AHA must ensure compliance with federal laws, regulations and notices and must establish policies and procedures to clarify federal requirements and to ensure consistency in program operation. The Arvada Housing Authority Housing Choice Voucher Program Administrative Plan contains the AHA's policies and procedures.

The majority of the revisions in the AHA Administrative Plan are mandated by HUD to ensure compliance with new laws and federal standards.On July 29, 2016, the Housing Opportunity through Modernization Act (HOTMA) was signed into law. HOTMA makes numerous amendments to Sections 3, 8, and 16 of the United States Housing Act of 1937, including significant changes to income calculations, net family assets, and income reviews. All public housing authorities, including the Arvada Housing Authority, must adopt the new HOTMA polices by amending their administrative plans.

Discussion

The administrative plan is a required document by HUD. The purpose of the administrative plan is to establish policies for operating the Housing Choice Voucher Program in a manner that is consistent with HUD requirements and local goals and objectives.

Public Contact

The AHA Administrative Plan revisions were made available for public comment from May 8 to May 30, 2025. The Plan was also made available to the Resident Advisory Board for comment.

Commission Recommendation

N/A

Strategic Alignment

The Arvada Housing Authority Administrative Plan supports the Housing goal identified in the City of Arvada Strategic Plan-Improve access to diverse, safe and affordable housing options and programs, providing residents with opportunities to obtain housing that meets their needs in all phases of life.

Alternative Courses of Action

N/A

Recommendation for Action

The Arvada team recommends that the Board approve the Arvada Housing Authority 2025 Administrative Plan Updates.

Suggested Motion:

I move that the Arvada Housing Authority 2025 Administrative Plan Updates be (approved) (rejected).

Prepared by:
Carrie Espinosa, Manager of Housing Preservation and Resources

Reviewed by:

Approved by:

Carrie Espinosa, Manager of Housing Preservation and Resources	6/9/2025
Jessica Garner, Director of Community and Economic Development	6/9/2025
Bryan Archer, Director of Finance	6/10/2025
Gail Walker, Legal Specialist-Contracts	6/10/2025
Erika Pierce, Litigation Paralegal	6/10/2025
Megan McCall, Assistant City Attorney II	6/11/2025
Rachel Morris, City Attorney	6/13/2025
Linda Haley, Deputy City Manager	6/14/2025
Don Wick, City Manager	6/17/2025

Enclosure, exhibits & attachments required to support the report

Colorado Community Media
750 W. Hampden Ave. Suite 225
Englewood, CO 80110

City of Arvada Legals **
8101 Ralston Road
Arvada CO 80002

AFFIDAVIT OF PUBLICATION

State of Colorado }
County of Jefferson } ss

This Affidavit of Publication for the Jeffco Transcript, a weekly newspaper, printed and published for the County of Jefferson, State of Colorado, hereby certifies that the attached legal notice was published in said newspaper once in each week, for 1 successive week(s), the last of which publication was made 5/8/2025, and that copies of each number of said paper in which said Public Notice was published were delivered by carriers or transmitted by mail to each of the subscribers of said paper, according to their accustomed mode of business in this office.

For the Jeffco Transcript

State of Colorado }
County of Jefferson } ss

The above Affidavit and Certificate of Publication was subscribed and sworn to before me by the above named Linda Shapley, publisher of said newspaper, who is personally known to me to be the identical person in the above certificate on 5/8/2025. Linda Shapley has verified to me that she has adopted an electronic signature to function as her signature on this document.

20134029363-647913

Jean Schaffer
Notary Public
My commission ends January 16, 2028

JEAN SCHAFFER
NOTARY PUBLIC - STATE OF COLORADO
NOTARY ID 20134029363
MY COMMISSION EXPIRES JAN 16, 2028

Public Notice

Arvada Housing Authority Housing Choice Voucher Program Public Notice for year 2025 Administrative Plan Revisions and Fiscal Year 2026 Annual Plan

Public Notice is hereby given that beginning **May 8, 2025, through May 30, 2025,** at 12:00 pm; The Arvada Housing Authority (AHA) will display for public review and comments a copy of proposed policy changes and revisions to the AHA Administrative Plan as well as a draft of the AHA annual plan for fiscal year 2026. Location for review will be at AHA's Office 8101 Ralston Rd., Arvada, CO, 80002, and the AHA website:
https://www.arvadaco.gov/438/Arvada-Housing-Authority---Housing-Choic

Comments on the agency's policy changes and revisions may be submitted in writing to Arvada Housing Authority, 8101 Ralston Rd., Arvada, CO, 80002; Attention: Dena Kothe, Housing Choice Voucher Program Supervisor or emailed to dkothe@arvada.org Comments must be received by Friday, May 30, 2025, by 12:00 pm. All comments will be reviewed prior to AHA Board of Commissioners meeting and public hearing on Tuesday, July 1, 2025, at 6:00 pm.

The Department of Housing and Urban Development (HUD) requires Public Housing Agencies to establish policies for carrying out the Housing Choice Voucher programs in a manner consistent with the HUD requirements and regulations (Code of Federal Regulations). The changes/revisions to the AHA Administrative Policy are in compliance with the current HUD regulations and requirements and are to be effective July 1, 2025. AHA's Public Hearing will be held at 6:00 pm on Tuesday, July 1, 2025, at 8101 Ralston Rd., Arvada, CO, 80002.

Legal Notice No. Jeff 1882
First Publication: May 8, 2025
Last Publication: May 8, 2025
Publisher: Jeffco Transcript

Arvada Housing Authority Administrative Plan July 2025

Proposed Changes

Location	Topic	Change Detail
Introduction	Introduction	Added Introduction Explaining HOTMA changes in the administrative plan, updated references cited in the administrative plan, NSPIRE and HQS in the administrative plan, and resources cited in the administrative plan.
Chapter 3	Eligibility 3-I.M. Live-in Aide	Changed “A family’s request for Live-in aide must be made in writing” to “A family’s request for a live-in aide may be made either orally or in writing.”
Chapter 3	Eligibility 3-II.D. Family Consent to the Release of Information	Added: “Upon AHA’s HOTMA 102/104 compliance date, the following on revocation of consent is added: AHA has established a policy that revocation of consent to access financial records will result in denial of admission.”
Chapter 3	Eligibility 3-III.C. Restriction on Assistance based on assets	Added: “Upon AHA’s HOTMA 102/104 compliance date, there are two circumstances under which a family is ineligible to received assistance based on asset ownership. 1) if the family’s net assets exceed the HUD published asset limitation amount (adjusted annually by HUD). $103,200 for 2025. 2) the family has real property that is suitable for occupancy by the family as a residence.”
Chapter 3	Eligibility 3-III.E. Screening	Changed “AHA will inform owners of their responsibility to screen prospective tenants and will provide owners with the required known name and address information, at the time of the initial inspection or before” to “AHA will inform owners of their responsibility to screen prospective tenants and upon request will provide owners with the required known name and address information, at the time of the initial inspection or before.”
Chapter 4	Applications, Waiting List and Participant Selection 4-I.B. Applying for assistance	Changed “As a reasonable accommodation for a person with a disability, AHA will accept a paper application returned to AHA by mail” to “As a reasonable accommodation for a person with a disability, AHA will assist applicants in the completion of an online

		application via telephone during regular business hours when the waiting list is open.”
Chapter 4	Applications, Waiting List and Participant Selection 4-II.B. Organization of the Waiting List	Changed “AHA will not merge the HCV waiting list with the waiting list for any other program AHA operates”, to “AHA will not merge the HCV waiting list with the waiting list for any other program AHA operates, unless there is an insufficient pool of applicants available to pull from a particular waiting list and eligible applicants exist on a different waiting list for another program that AHA operates.″
Chapter 4	Applications, Waiting List and Participant Selection 4-II.D. Family Outreach	Added new policy which states, “AHA will monitor the characteristics of the population being served and the characteristics of the population as a whole in AHA’s jurisdiction. Targets outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved”
Chapter 4	Applications, Waiting List and Participant Selection 4-III.B. Selection and HCV funding sources	Under targeted funding added “AHA administers the following types of targeted funding-Mainstream Housing Vouchers.”
Chapter 4	Applications, Waiting List and Participant Selection 4-III.C. Local Preferences	Removed preferences for families enrolled in transitional or self-sufficient program-at risk of homelessness
Chapter 4	Applications, Waiting List and Participant Selection 4-III.C. Local Preferences	Changed, “Any single person, Head of Household or spouse who is disabled automatically qualifies for the employment preference” to “If any member pf the applicant household is disabled, the family automatically qualifies for the employment preference.”
Chapter 4	Applications, Waiting List and Participant Selection 4-III.C. Selection Method Order of Selection	Added: “Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with AHA’s hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by AHA. Documentation will be maintained by AHA as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not interested in targeted funding, there will be a notation maintained so that AHA does not have to ask higher placed families each time targeted selections are made.”
Chapter 5	Briefings and voucher Issuance 5-I.B. Briefing	Added policies regarding how AHA will conduct Remote Briefings.

Chapter 5	Briefings and voucher Issuance F-I.C. Family Obligations	Current policy: "AHA will determine if a family has committed serious or repeated violations of the lease based on available evidence, including by not limited to, a court-ordered eviction or an owner's notice to evict. Added: "police reports, and affidavits from the owner, neighbors, or other credible parties with direct knowledge."
Chapter 5	Briefings and voucher Issuance F-I.C. Family Obligations	Under Serious and repeated lease violations- Added "Any incidents of, or criminal activity related to domestic violence, dating violence, sexual assault, stalking, or human trafficking will not be construed as serious or repeated lease violations by the victim [See 24 CFR 5.2005(c)(1)].
Chapter 6A Pre-HOTMA	6-I.C. Anticipating Annual Income	Current policy- "When tenant-provided third-party documents are used to anticipate annual income, they will be dated within 60 days of the reexamination interview date." Added "Statements dated within the appropriate benefit year will be accepted for fixed income sources.
Chapter 6A Pre-HOTMA	6-I.F. Business Income	Added "Investments do not include the value of labor contributed to the business without compensation."
Chapter 6A Pre-HOTMA	Income and Subsidy Determinations 6-I.G. Student Financial Assistance	New HOTMA regulations regarding what financial assistance MUST be excluded and a list of covered costs. Other student financial assistance received by the student that exceeds the actual covered costs is included in income.
Chapter 6A Pre-HOTMA	Income and Subsidy Determinations 6-I.G. Calculating Income from Student Financial Assistance	Defined more specific policies regarding types of assistance a student may receive and what should be included or excluded for the purposes of calculating income of a student in the following scenarios: • If the student does not live with their parents and is the head of household, cohead, or spouse, and is 23 or younger or does not have dependent children • If a student is head, spouse or cohead, and is over 23 with dependent children or lives with their parents
Chapter 6A Pre-HOTMA	Income and Subsidy Determinations 6-I.H. Periodic Payments Lump-Sum Payments for the Delayed Start Payment	Added "If the delayed-start payment is received outside of the time the AHA is processing an annual reexamination, then AHA

		will consider whether the amount meets the threshold to conduct an interim reexamination. If so, AHA will conduct an interim in accordance with AHA policies in Chapter 9. If not, AHA will consider the amount when processing the family's next annual recertification."
Chapter 6A Pre-HOTMA	Income and Subsidy Determinations 6-I.I. Non-recurring Income	Added: "PHAs are prohibited from assigning monetary value to such non-monetary in-kind donations received by the family [Notice PIH 2023-27]. Non-recurring, non-monetary in-kind donations from friends and family are excluded as non-recurring income.
Chapter 6A Pre-HOTMA	Income and Subsidy Determinations 6-I.M. Assets	ABLE Accounts has been added. "An Achieving a Better Life Experience (ABLE) account is a type of tax-advantaged savings account that an eligible individual can use to pay for qualified disability expenses. Section 103 of the ABLE Act mandates that an individual's ABLE account (specifically, its account balance, contributions to the account, and distributions from the account) is excluded when determining the designated beneficiary's eligibility and continued occupancy under certain federal means-tested programs. AHA must exclude the entire value of the individual's ABLE account from the household's assets. Distributions from the ABLE account are also not considered income. However, all wage income received, regardless of which account the money is paid to, is included as income."
Chapter 6A Pre-HOTMA	Income and Subsidy Determinations Part III: Calculating Family Share and Subsidy Utility Reimbursement	Changed "AHA will make utility reimbursements directly to the utility company" to "AHA will make utility reimbursements directly to the utility company. In the instances where a family is billed for all utilities through the property in which they reside and they do not have an account with a utility company, AHA will make utility reimbursements directly to the family."
Chapter 6A Pre-HOTMA	Income and Subsidy Determinations 6-III.C. Applying Payment Standards	Regulations governing increases and decreases in the payment standard have changed, with a required compliance date of December 3, 2024. For increases in payment standards, added, "If the payment standard is increased during the term of the HAP contract, the

		increased payment standard will be applied no later than the earliest of: • The effective date of an increase in the gross rent that would result in an increase in the family share; • The family's first regular or interim reexamination; or • One year following the effective date of the increase in the payment standard amount. AHA may adopt a policy to apply a payment standard increase at any time earlier than the date calculated above as long as the policy is included in the administrative plan and applied consistently to all families [24 CFR 982.505(c)(5)]. AHA will not adopt payment standard increases earlier than the date required by the regulations. For decreases in payment standards, added, "If AHA changes its payment standard schedule resulting in a lower payment standard amount, during the term of a HAP contract, AHA will not reduce the payment standard used to calculate subsidy for families under HAP contract as long as the HAP contact amount, during the term of HAP contract remains in effect" Added, "AHA will not establish different policies for decreases in payment standard for designated areas within their jurisdiction."
Chapter 6A Pre-HOTMA	Income and Subsidy Determinations 6-III.D. Applying Utility Allowances	New guidance: AHA may base its utility allowance payments on actual flat fees charged by an owner for utilities that are billed directly by the owner, but only if the flat fee charged by the owner is no greater than AHA's applicable utility allowance for the utilities covered by the fee. If the owner charges a flat fee for some but not all utilities, AHA must pay a separate allowance for any tenant-paid utilities not covered in the flat fee. Added "AHA will not base utility allowance payments on flat fees charged by the owner."
Chapter 6B Post HOTMA	Income and Subsidy Determinations Part 1: Annual Income 6-1.A. Overview	Added "6-1.A. Overview"-more thorough explanation of Annual income that is included unless specifically excluded by regulation.

Chapter 6B Post HOTMA	Income and Subsidy Determinations 6-I.C. Calculating Annual Income Anticipating Annual Income	Significant changes have been made to calculating annual income. The methodology used for calculating income differs depending on whether income is being calculated at initial occupancy, interim reexamination, or at annual reexamination. However, income from assets is always anticipated regardless of certification type. When referring to Known Changes in Income, “The family may present information that demonstrates that implementing a change before its effective date would create a hardship for the family. In such cases AHA will calculate annual income using current circumstances and then require an interim reexamination when the change actually occurs” has been changed to “The family may present information that demonstrates that implementing a change before its effective date would create a hardship for the family. In such cases AHA will calculate annual income using current circumstances and then, should the change in income require AHA to conduct an interim reexamination, conduct an interim reexamination in accordance with PHA policy in Chapter 11.
Chapter 6B Post HOTMA	Income and Subsidy Determinations 6-I.C. Calculating Annual Income Calculating Annual Income at Annual Reexamination	Added: “At annual reexamination, except where AHA uses a streamlined income determination, PHAs must first determine the family’s income for the previous 12-month period and use this amount as the family income for annual reexaminations; however, adjustments to reflect current income must be made. Any change of income since the family’s last annual reexamination, including those that did not meet the threshold to process an interim reexamination of family income in accordance with PHA policies in Chapter 11 and HUD regulations, must be considered. If, however, there have been no changes to income, then the amount of income calculated for the previous 12-month period is the amount that will be used to determine the family’s rental assistance. Income from assets is always anticipated, irrespective of the income examination type. Policies related to conducting annual reexaminations are located in Chapter 11.

Chapter 6B Post HOTMA	Income and Subsidy Determinations 6-I.D. Earned Income	Added specific definitions as to various types of earned income. Under earnings of a Minor added "All other sources of unearned income, except those specifically excluded by the regulations, are included." Under earned income of Full-time students, added, "All other sources of unearned income, except those specifically excluded by the regulations, are included." Added, "A family member other than the head of household or spouse/cohead is considered a full-time student if they are attending school or vocational training on a full-time basis [24 CFR 5.603(b)]."
Chapter 6B Post HOTMA	Income and Subsidy Determinations 6-I.E. Earned Income Disallowance for Persons with disabilities	The section was previously removed but has been added back in. It is available only to families that are eligible for and participating in the program as of December 31, 2023. No new families may be added.
Chapter 6B Post HOTMA	Income and Subsidy Determinations 6-I.F. Business and Self-employment Income	Added definition of independent contractors with income that is included. Added guidance to calculate income from "Assets Owned by a Business Entity"
Chapter 6B Post HOTMA	Income and Subsidy Determinations 6-I.H. Periodic Payments	New regulations regarding the calculation of child support and alimony
Chapter 6B Post HOTMA	Income and Subsidy Determinations 6-II.C. Asset Inclusions and Exclusions	Language regarding Asset inclusions and exclusions as pertaining to necessary and non-necessary personal property. Threshold amount of $51,600 for 2025 for the value of non-necessary items included in annual income-adjusted annually.
Chapter 6B Post HOTMA	Income and Subsidy Determinations Part III: Adjusted Income	Mandatory deductions is now $525 (as opposed to $400) for any elderly or disabled family (adjusted annually by HUD).
Chapter 6B Post HOTMA	Income and Subsidy Determinations 6-III.D. Health and Medical Care Expenses Deduction	Unreimbursed health and medical care expenses may be deducted to the extent that, in combination with any disability assistance expenses, they exceed ten percent of annual income (previous guidance was expenses that exceed three percent of annual income).
Chapter 6B Post HOTMA	Income and Subsidy Determinations 6-III.G. Hardship Exemptions Health and Medical Care and Disability Assistance Expenses.	New guidance regarding hardship exemptions. There are two categories of relief; phased-in relief or general relief.

		Phase-in Relief : is applicable to all families who received a deduction for unreimbursed health and medical care and/or reasonable attendant care or auxiliary apparatus expenses based on their most recent income review prior to 1/1/24. For these families the threshold amount is phased-in as follows: For these families, the threshold amount is phased-in as follows: • The family is eligible for a deduction totaling the sum of expenses that exceeds 5 percent of annual income for the first 12 months. • At the conclusion of 12 months, the family is eligible for a deduction totaling the sum of their expenses that exceed 7.5 percent of annual income for another 12 months. • At the conclusion of 24 months, the standard threshold amount of 10 percent would be used, unless the family qualifies for relief under the general hardship relief category. AHA will not continue the phased-in relief for families who move from public housing to HCV. These families will be treated as new admissions and the sum of expenses that exceeds 10% of annual income will be used to calculate their adjusted income. When an eligible family's phased-in relief begins at an interim reexamination, AHA must process another transaction (either an interim reexamination or non-interim transaction, as applicable) one year later to move the family to the next phase. Prior to the end of the 24-month period, the family may request a hardship exemption under the second category as described below. If the family is found eligible under the second category, the hardship exemption under the first category ends, and the family's hardship is administered in accordance with the

		requirements listed below. Once a family requests general relief, the family may no longer receive phased-in relief. General Relief: To qualify for a hardship exemption, a family must submit a request in writing. The request must show that the family's health and medical and/or disability assistance expenses have increased (other than the transition to the higher threshold) and that the family's financial hardship is a result of a change in circumstances. AHA defines *a change in circumstances* as a decrease in income or increase in other expenses that has resulted in the family's financial hardship but does not, on its own, trigger an interim reexamination in accordance with PHA policies. To qualify for a hardship exemption, a family must submit a request in writing. The request must show that the family's health and medical and/or disability assistance expenses have increased (other than the transition to the higher threshold) and that the family's financial hardship is a result of a change in circumstances. AHA defines *a change in circumstances* as a decrease in income or increase in other expenses that has resulted in the family's financial hardship but does not, on its own, trigger an interim reexamination in accordance with PHA policies. AHA will make a determination of whether the family qualifies within 30 calendar days and will notify the family in writing of the result within 10 business days of the decision. AHA notice will state that if the family does not agree, the family may request a hearing. If the family qualifies for an exemption, AHA will include the date the hardship exemption will begin and the date it will expire as well as information on how to request a 90-day extension based on family circumstances.
Chapter 6B Post HOTMA	Income and Subsidy Determinations 6-III.G. Hardship Exemptions Childcare Expense Hardship Exemption	A family whose eligibility for the childcare expense deduction is ending may request a financial hardship exemption to continue receiving the deduction. AHA must develop a policy to define what constitutes a hardship. AHA must obtain third-party verification of the hardship and AHA must attempt to obtain third-party verification prior to the end of the 90-day hardship

		exemption period. AHA will make a determination of whether the family qualifies within 30 calendar days and will notify the family in writing of the result within 10 business days of the decision. AHA notice will state that if the family does not agree, the family may request a hearing. If the family qualifies for an exemption, AHA will include the date the hardship exemption will begin and the date it will expire as well as information on how to request a 90-day extension based on family circumstances. The family may request an extension either orally or in writing prior to the end of the hardship exemption period. AHA will extend relief for an additional 90-days if the family demonstrates to AHA's satisfaction that the family continues to qualify for the hardship exemption. AHA will require updated verification based on the family's current circumstances. Additional extensions may be granted on a case-by-case basis provided the family continues to request extensions prior to the end of each hardship exemption period. Families must report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. At any time, AHA may terminate the hardship exemption if AHA determines that the family no longer qualifies for the exemption.
Chapter 6B Post HOTMA	Income and Subsidy Determinations 6-III.H. Permissive Deductions	AHA has opted not to use permissive deductions.
Chapter 6B Post HOTMA	Income and Subsidy Determinations 6-IV.D. Applying Utility Allowances Reasonable Accommodations and Individual Relief	Added, "AHA will consider the following criteria as valid reasons for granting individual relief: • The family's consumption was mistakenly portrayed as excessive due to defects in the meter or errors in the meter reading. • The excessive consumption is caused by a characteristic of the unit or owner-supplied equipment that is beyond the family's control, such as a particularly inefficient refrigerator or inadequate insulation. The allowance should be adjusted to reflect the higher consumption needs associated with the unit until the situation is remedied. The resident should be granted individual relief until the allowance is adjusted. • The excessive consumption is due to special needs of the family that are beyond their control, such as the need for specialized equipment in the case of a family member who is

		ill, elderly, or who has a disability.
Chapter 7A Pre HOTMA	Verification 7-I.A. Family Consent to Release of Information	Form HUD-9886-A replaces form HUD 9886. HUD 9886 was required to be signed at each annual reexamination. New form HUD-9886-A be signed only once. Another form HUD-9886-A will not be submitted to AHA except under the following circumstances: • When any person 18 years or older becomes a member of the family; • When a current member of the family turns 18; or • As required by HUD or AHA in administrative instructions. Added: "Family members turning 18 years of age between annual recertifications will be notified in writing that they are required to sign the required Consent to the Release of Information Form HUD-9886-A within 10 business days of turning 18 years of age."
Chapter 7A Pre HOTMA	Verification 7-I.B. Overview of Verification Requirements Use of Other Program' Income Determinations	Added Policies regarding the use of Safe Harbor determinations of income at annual reexamination to determine the family's total annual income.
Chapter 7A Pre HOTMA	Verification 7-I.C. Up-front Income Verification	Added policies regarding the use of IVT reports. Added, "AHA will not use income information in EIV at annual reexam when Safe harbor verification is used to determine a family's income.
Chapter 7A Pre HOTMA	Verification 7-I.D. Third Party Written and Oral Verification Written Third-Party Verification	Added, "AHA will accept a statement dated within the appropriate benefit year for fixed income sources."
Chapter 7A Pre HOTMA	Verification 7-I.D. Third Party Written and Oral Verification Value of Assets and Asset Income	Added: "For families with net assets totaling $5,000 or less, AHA will accept the family's self-certification of the value of family assets and anticipated asset income when applicable. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration. AHA will use third-party documentation for assets as part of the intake process, whenever a family member is added to verify the individual's assets, and every three years thereafter."

Chapter 7A Pre HOTMA	Verification 7-II.B. Social Security Number	Added: "While PHAs must attempt to gather third-party verification of SSNs prior to admission as listed above, PHAs also have the option of accepting a self-certification and a third-party document (such as a bank statement, utility or cell phone bill, or benefit letter) with the applicant's name printed on it to satisfy the SSN disclosure requirement if AHA has exhausted all other attempts to obtain the required documentation. If verifying an individual's SSN using this method, AHA must document why the other SSN documentation was not available [Notice PIH 2023-27]." "If the tenant's SSN becomes verified in EIV, then no further verification is required. If the tenant's SSN fails the SSA identity match, then AHA must obtain a valid SSN card issued by the SSA or an original document issued by a federal or state government agency that contains the name of the individual and the SSN of the individual, along with other identifying information of the individual. The tenant's assistance must be terminated if they fail to provide the required documentation." AHA will verify an individual's SSN in the situations described above using the method described above as a last resort when no other forms of verification of the individual's SSN are available."
Chapter 7A Pre HOTMA	Verification 7-II.F. Documentation of Disability Family Members Receiving SSA Disability Benefits	Change, "If documentation from HUD's EIV System is not available, AHA will request a current (dated within the last 60 days) SSA benefit verification letter" to "If documentation from HUD's EIV System is not available, AHA will request a current (dated within the appropriate benefit year) SSA benefit verification letter."
Chapter 7A Pre HOTMA	Verification 7-III.C. Periodic Payments and Payments in Lieu of Earnings	Change, "To verify the SS/SSI benefits of applicants, AHA will request a current (dated within the last 60 days) SSA benefit verification letter" to "To verify the SS/SSI benefits of applicants, AHA will request a current (dated within the appropriate benefit year) SSA benefit verification letter.
Chapter 7A Pre HOTMA	Verification 7-III.C. Periodic Payments and Payments in Lieu of Earnings	Add: "Photocopies of social security checks or bank statements are not acceptable forms of verification for SS/SSI benefits."

Chapter 7A Pre HOTMA	7-III.F. Net Income from Rental Property	Add: "If schedule E was not prepared, AHA will require the family members involved in the rental of property to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement including: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense."
Chapter 7A Pre HOTMA	Verification 7-III.I. Zero Income Families	Add: "If any sources of income are identified on the form, AHA will verify the income in accordance with the policies in this chapter prior to including the income in the family's annual income. AHA will conduct interims in accordance with PHA policy in Chapter 11."
Chapter 7A Pre HOTMA	Verification 7-III.J. Student Financial Assistance	Change, "In addition, AHA will request written verification from the institution of higher education regarding the student's tuition amount" to, "In addition, unless the student's only source of assistance is assistance under Title IV of the HEA, AHA will request written verification of the cost of the student's tuition, books, supplies, room and board, and other required fees and charges to the student from the educational institution."
Chapter 7A Pre HOTMA	Verification 7-IV.B. Health and Medical Care Expense Deduction	Title changed from Medical Expense Deduction
Chapter 7B Post HOTMA	Verification 7.I.A. Family Consent to Release of Information Form HUD-9886-A	With HOTMA changes Form HUD-9886-A need only be signed once (vs annually) except for when any person 18 years or older becomes a member of the family, when a current member of the family turns 18 or as required by HUD or the AHA in administrative instructions. AHA has the discretion to establish policies around when family members must sign consent forms when they turn 18. Add AHA policy: "During the annual reexamination review, AHA will send a consent form to any household member who will be turning 18 within the next 12 months. AHA will track the date that family member will be turning 18 and require that the form is returned within 10 business days of the date of turning 18 years of age."
Chapter 7B Post HOTMA	Verification 7.I.A. Family Consent to Release of Information Penalties for Failing to Consent	Add: "AHA has established a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with PHA policy." In order for a family to revoke their consent, the family must provide written notice to AHA. Within 10 business days of the

		date the family provides written notice, AHA will send the family a notice acknowledging receipt of the request and explaining that revocation of consent will result in denial or termination of assistance, as applicable. At the same time, AHA will notify their local HUD office."
Chapter 7B Post HOTMA	Verification 7-I.B. Use of Other Programs Income Determinations	AHA will not accept other programs' Safe Harbor determinations of income.
Chapter 7B Post HOTMA	Verification 7-I.C. Streamlined Income Determinations	New Policy: When AHA does not use a Safe Harbor income determination from a federal assistance program to determine the family's annual income as outlined above, then PHA will use a streamlined income determinations where applicable. • Regardless of the percent of a family's unadjusted income from fixed income sources: • AHA will streamline the annual reexamination process by applying the verified COLA/inflationary adjustment factor to fixed-income sources. • The family will be required to sign a self-certification stating that their sources of fixed income have not changed from the previous year. • AHA will document in the file how the determination that a source of income was fixed was made. • If the family's sources of fixed income have changed from the previous year, AHA will obtain third-party verification of any new sources of fixed income. • All other income will be verified using third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy. In the following circumstances, regardless of the percentage of income received from fixed sources, AHA will obtain third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy: • Of all assets when net family assets exceed the HUD-published threshold ($50,000 for 2024, and $51,600 for 2025); • Of all deductions and allowances from annual income; • If a family member with a fixed source of income is added; • If verification of the COLA or rate of interest is not available; • During the intake process and at least once every three years thereafter

Chapter 7B Post HOTMA	Verification 7-I.E. Level 5&6 Verifications HUD's Enterprise Income Verification (EIV) System (Mandatory)	Add, "Income reports will only be used for interim reexaminations as necessary. For example, EIV may be used to verify that families claiming zero income are not receiving income from any sources listed in EIV."
Chapter 7B Post HOTMA	Verification 7-I.E. Level 5&6 Verifications New Hires Report	Add: "In accordance with PHA policies in Chapter 11, AHA does not process interim reexaminations for families who have increases in earned income. Except for instances in which AHA uses Safe Harbor income determinations to determine a family's annual income, AHA will only review the New Hires Report at annual reexamination."
Chapter 7B Post HOTMA	Verification 7-I.E. Level 5&6 Verifications Deceased Tenants Report	AHA Policy: AHA will review the Deceased Tenants Report on a monthly basis. AHA will list the EOP as the last day of the month in which the death occurred. The landlord is entitled to receive the full HAP amount for the month in which the tenant death occurred.
Chapter 7B Post HOTMA	Verification 7.I.F. Level 4 Verification EIV+Self-Certification	Add EIV+Self-Certification guidance AHA Policy: "At annual reexamination, if AHA is unable to use a determination of income from a means-tested federal assistance program and if there are no reported changes to an income source, AHA will use EIV + self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV. AHA will use an average of the last two quarters of income listed in EIV to determine income from employment. AHA will provide the family with the information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income. If the family disagrees with using only the last two quarters of income listed in EIV, because of the seasonal or otherwise fluctuating nature of a particular family member's employment, AHA will permit the family to sign a self-certification stating that the average of all four quarters of income listed in EIV is accurate and representative of current annual income and use that

		amount for calculating annual income. If the family disagrees and contends that the amount listed in EIV is not reflective of current income, or if less than two quarters are available in EIV, AHA will use written third-party verification from the source as outlined below. AHA will not use this method of verification at new admission since EIV is not available for applicant families or at interim reexamination since the income information in EIV is not current.”
Chapter 7B Post HOTMA	Verification 7.I.F. Level 4 Verification Written Third-Party Verification from the Source	AHA Policy: “In general, AHA will use third-party verification from the source in the following circumstances: • At annual reexamination when EIV + self-certification is not used; • For all new admissions; and • For all interim reexaminations. AHA will not use this method if AHA is able to use an income determination from a means-tested federal assistance program or if AHA uses EIV + self-certification as outlined above. In general, third-party documents provided by the family or the source must be dated within 120 days of the date received by AHA. However, for fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation. In general, third-party documents provided by the family or the source must be dated within 120 days of the date received by AHA. However, for fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation. AHA may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible. If AHA determines that third-party documents provided by the family are not acceptable, AHA will explain the reason to the family and request additional documentation from the family or will use a lower form of verification such as a written third-party verification form.

		When verification of assets held by a banking or financial institution is required, AHA will obtain one statement that reflects the current balance of the account. When pay stubs are used, AHA will require the family to provide the two most current, consecutive pay stubs. At AHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), AHA may request additional paystubs or a payroll record."
Chapter 7B Post HOTMA	Verification 7.I.G. Level 3 Verification Written Third-Party Form	Add: "However, on a case-by-case basis, AHA may choose to obtain oral third-party verification without first attempting, and in lieu of, a written-third party verification form."
Chapter 7B Post HOTMA	Verification 7.I.G. Level 3 Verification Written Third-Party Form	Add: "In general, AHA will attempt to obtain written third-party verification via a form from the verification source. If written third-party verification forms are not returned within 10 business days, AHA will accept self-certification from the family without attempting to obtain oral third-party verification."
Chapter 7B Post HOTMA	Verification 7-III.E. Nonrecurring Income	Add: "AHA will accept self-certification from the family stating that income will not be repeated in the coming year. However, AHA may choose, on a case-by-case basis, to require third-party verification that income sources will not be repeated in the coming year."
Chapter 7B Post HOTMA	Verification 7-III.F. Assets and Income from Assets Net Family Assets	Add: "For families with net assets less than or equal to the HUD-published threshold listed in the current year's Inflation-Adjusted Values tables, AHA will accept the family's self-certification of the value of family assets and anticipated asset income. The family's declaration must show the total amount of income expected from all assets. All family members 18 years of age and older must sign the family's declaration. AHA reserves the right to require additional verification in situations where the accuracy of the declaration is in question. Any income the family expects to receive from assets will be included in the family's annual

		income. The family will be required to provide third-party verification of net family assets every three years. When verification is required, in determining the value of checking or savings accounts, AHA will use the current balance. In determining the anticipated income from an interest-bearing checking or savings account when verification is required and the rate of return is known, AHA will multiply the current balance of the account by the current rate of interest paid on the account. If a checking account does not bear interest, the anticipated income from the account is zero.”
Chapter 7B Post HOTMA	Verification 7-III.F. Assets and Income from Assets Self-Certification of Real Property Ownership	Add: “AHA will accept self-certification from the family stating that the family does not have any present ownership in any real property. The certification must be signed by all family members 18 years of age and older. AHA reserves the right to require additional verification in situations where the accuracy of the declaration is in question. If the family declares they have a present ownership in real property, AHA will obtain third-party verification of the following factors: whether the family has the legal right to reside in the property; whether the family has effective legal authority to sell the property; and whether the property is suitable for occupancy by the family as a residence. However, in cases where a family member is a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, AHA will comply with confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.”
Chapter 7B Post HOTMA	Verification 7-III.I. Retirement Accounts	Add: “AHA will accept an original document from the entity holding the account dated no earlier than 12 months before that reflects any distributions of the account balance, any lump sums taken, and any regular payments.”
Chapter 7B Post HOTMA	Verification 7-III.K. Zero Income Families	Add: “If any sources of income are identified on the form, AHA will verify the income in accordance with the policies in this chapter prior to including the income in the family’s annual income.

		AHA will only conduct interims in accordance with PHA policy in Chapter 1.”
Chapter 7B Post HOTMA	Verification 7-IV.B. Health and Medical Care Expense Deduction Amount of Expense	Add: “When income is projected at new admission or interim…”
Chapter 7B Post HOTMA	Verification 7-IV.B. Health and Medical Care Expense Deduction Expenses Incurred in Past Years	Add: “At new admission and interim reexam…”
Chapter 7B Post HOTMA	Verification 7-IV.C. Disability Assistance Expenses Attendant Care	Add: “When income is projected at new admission or interim…”
Chapter 9	General Leasing Policies 9.I.B. Requesting Tenancy Approval	Change, “Completed RFTA must be submitted as hard copies, in-person, by mail, or by fax” to “Completed RFTA must be submitted as hard copies, in-person, by mail, by email or by fax” in all three paragraphs of this section.
Chapter 9	General Leasing Policies 9-I.E. Lease and Tenancy Addendum Review of Lease	Change, “Missing and corrected lease information will only be accepted as hard copies, in- person, by mail, or by fax” to “Missing and corrected lease information will only be accepted as hard copies, in- person, by mail, by email or by fax.”
Chapter 9	General Leasing Policies 9-I.F. Tenancy Approval	Change, “Corrections to the RFTA/proposed lease will only be accepted as hard copies, in- person, by mail, or by fax. AHA will not accept corrections over the phone” to “Corrections to the RFTA/proposed lease will only be accepted as hard copies, in- person, by mail, by email, or by fax. AHA will not accept corrections over the phone.”
Chapter 10	Moving with Continued Assistance and Portability 10-I.B. Family Moves Due to Unit Deficiencies Units in Abatement	This section has been added. AHA Policy: “Upon receipt of a family’s written notification that it wishes to move, AHA will issue a voucher within 10 business days of AHA’s written approval to move. No briefing is required for these families. AHA will follow the policies set forth in Chapter 5 on voucher term, extension, and expiration.”
Chapter 10	Moving with Continued Assistance and Portability 10-I.B. Family Moves Due to Unit Deficiencies Termination of HAP Contract and Family Moves	This section has been added. AHA Policy: “AHA will issue a family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame a voucher no later than 30 days prior to the termination of the HAP contract. The initial term of the voucher will be 90 calendar days. No briefing is required for these families.

		To continue under the tenant-based HCV program, the family must submit a Request for Tenancy Approval and proposed lease within the 90-day period unless AHA grants an extension. AHA will follow the policies set forth in Chapter 5 on voucher extension and expiration."
Chapter 10	Moving with Continued Assistance and Portability 10-I.B. Family Moves Due to Unit Deficiencies Offer of Public Housing	This section has been added. AHA Policy: "AHA does not operate a public housing program and will not provide a preference for HCV families whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who were unable to lease a new unit within the term of the voucher."
Chapter 10	Moving with Continued Assistance and Portability 10-I.B. Family Moves Due to Unit Deficiencies Relocation Assistance	This section has been added. AHA Policy: "AHA will assist families with disabilities with locating available accessible units in accordance with program requirements."
Chapter 10	Moving with Continued Assistance and Portability 10.I.C. Restrictions on Moves Restrictions on Elective Moves	Add: "AHA will consider exceptions to these policies for the following reasons: to protect the health or safety of a family member (e.g., lead-based paint hazards, domestic violence, witness protection programs), to accommodate a change in family circumstances (e.g., new employment, school attendance in a distant area), or to address an emergency situation over which a family has no control. In addition, AHA will allow exceptions to these policies for purposes of reasonable accommodation of a family member who is a person with disabilities (see Chapter 2)."
Chapter 10	Moving with Continued Assistance and Portability 10.I.D. Moving Process Voucher Issuance and Briefing	Add: "For families moving due an owner failing to make required repairs timely, resulting in AHA terminating the HAP contract, AHA will follow the policies set forth earlier in this section and in Chapter 8, Part II."
Chapter 10	Moving with Continued Assistance and Portability 10.II.B. Initial PHA Role Voucher Issuance and Term	Add: "However, if the move is due to the HAP contract being terminated due to an owner failing to make required repairs within the required time frame, AHA will issue the family a voucher no later than 30 days prior to the termination of the HAP

		contract. The initial term of the voucher will be 90 calendar days.”
Chapter 10	Moving with Continued Assistance and Portability 10.II.B. Initial PHA Role Monthly Billing Payments	Add: “If the initial PHA extends the term of the voucher, the receiving PHA’s voucher will expire 30 calendar days from the new expiration date of the initial PHA’s voucher.”
Chapter 10	Moving with Continued Assistance and Portability 10-II.C. Receiving PHA Role Voucher Term	Add: “If the initial PHA extends the term of the voucher, the receiving PHA’s voucher will expire 30 calendar days from the new expiration date of the initial PHA’s voucher.”
Chapter 11A Pre HOTMA	Reexaminations 11-I.C. Conducting Annual Reexaminations Part I: Annual Reexaminations	Add: “At the annual reexamination, AHA will ask whether the tenant, or any member of the tenant’s household, is subject to a lifetime sex offender registration requirement in any state. AHA will use the Dru Sjodin National Sex Offender database to verify the information provided by the tenant.”
Chapter 11A Pre HOTMA	Reexaminations 11-II.B. Changes in Family and Household Composition	Add: “If the family unit size (voucher size) changes during the term of a HAP contract, the new family unit size will be used to determine the payment standard at the family’s first regular reexamination following the change in family unit size.”
Chapter 11A Pre HOTMA	Reexaminations 11-III.C. Notification of New Family Share and HAP Amount	Add: “The notice to the family will include the annual and adjusted income amounts that were used to calculate the family share of the rent and the housing assistance payment. The notice will state the family has the right to request an explanation of how the assistance was calculated and if the family disagrees, they have the right to informal hearing. The notice will include the procedures for requesting an informal hearing.”
Chapter 11B Post HOTMA	Reexaminations 11-I.E. Calculating Annual Income at Annual Reexamination	Added steps on how to determine annual income as mandated by HOTMA.
Chapter 11B Post HOTMA	Reexaminations 11-II.C. Changes Affecting Income or Expenses Interim Decreases	Add: “AHA will conduct an interim reexamination any time the family’s adjusted income has decreased by any amount.”

Chapter 11B Post HOTMA	Reexaminations 11-II.C. Changes Affecting Income or Expenses Interim Increases	Add: "When a family reports an increase in their earned income between annual reexaminations, AHA will not conduct an interim reexamination, regardless of the amount of the increase, and regardless of whether there was a previous decrease since the family's last annual reexamination. AHA will process an interim reexamination for any increases in unearned income of 10 percent or more in adjusted income. AHA will not perform an interim reexamination when a family reports an increase in income (whether earned or unearned income) within three months of their annual reexamination effective date. However, families who delay reporting income increases until the last three months of their certification period may be subject to retroactive rent increases in accordance with AHA policies in Chapter 14."
Chapter 11B Post HOTMA	Reexaminations 11-II.C. Changes Affecting Income or Expenses Family Reporting	Add: "The family will be required to report all changes in income regardless of the amount of the change, whether the change is to earned or unearned income, or if the change occurred during the last three months of the certification period. Families must report changes in income within 10 business days of the date the change takes effect. The family may notify AHA of changes either orally or in writing, including email. If the family provides oral notice, AHA may also require the family to submit the changes in writing, including email. Within 10 business days of the family reporting the change, AHA will determine whether the change will require an interim reexamination. If the change will not result in an interim reexamination, AHA will note the information in the tenant file but will not conduct an interim reexamination. AHA will send the family written notification (which may be emailed) within 10 business days of making this determination informing the family that AHA will not conduct an interim reexamination. If the change will result in an interim reexamination, AHA will determine the documentation the family will be required to

		submit based on the type of change reported and PHA policies in Chapter 7. AHA will ask the family to report changes in all aspects of adjusted income at this time. The family must submit any required information or documents within 10 business days of receiving a request from AHA. This time frame may be extended for good cause with PHA approval. AHA will accept required documentation by mail, email, or in person. AHA will conduct the interim within a reasonable time period based on the amount of time it takes to verify the information. Generally, the family will not be required to attend an interview for an interim reexamination. However, if AHA determines that an interview is warranted, the family may be required to attend."
Chapter 11B Post HOTMA	Reexaminations 11-II.D. Effective Dates Changes Not Reported Timely	Add: "In general, when the family fails to report a change in income or family composition timely, and the change would lead to a rent decrease, AHA will apply the decrease the first of the month following completion of the interim reexamination. However, AHA will apply the results of the interim reexamination retroactively where a family's ability to report a change in income promptly may have been hampered due to extenuating circumstances such as a natural disaster or disruptions to PHA management operations. AHA will decide to apply decreases retroactively on a case-by-case basis. When AHA applies the results of interim increases retroactively, AHA will clearly communicate the effect of the retroactive adjustment to the family and may enter into a repayment agreement in accordance with PHA policies. AHA will also clearly communicate the effect of the retroactive adjustment to the owner."
Chapter 11B Post HOTMA	Reexaminations Exhibit 11-1 Calculating Income at Annual Reexamination	Added Examples of how to calculate income
Chapter 12	Termination of Assistance and Tenancy 12-I.D. Mandatory Termination of Assistance Failure to Provide Consent	Add: "Upon AHA's HOTMA 102/104 compliance date, the below policy on failure to provide consent is added: AHA will also terminate assistance if the family revokes consent for AHA to collect information from financial institutions."

Chapter 12	Termination of Assistance and Tenancy 12.I.F. Mandatory Policies and Other Authorized Terminations Use of Illegal Drugs and Alcohol Abuse	Add: “A record or records of arrest will not be used as the sole basis for the termination or proof that the participant engaged in disqualifying criminal activity.”
Chapter 12	Termination of Assistance and Tenancy 12.I.F. Mandatory Policies and Other Authorized Terminations Other Authorized Reasons for Termination of Assistance Asset Limitation	Add: “AHA has adopted a policy of total nonenforcement of the asset limitation for all program participants. The asset limitation only applies to initial eligibility determinations for new admissions to AHA’s HCV program.”
Chapter 12	Termination of Assistance and Tenancy 12.I.F. Mandatory Policies and Other Authorized Terminations Other Authorized Reasons for Termination of Assistance Insufficient Funding	Add: “Category 3: Families who have been assisted in the HCV program the longest, excluding families that include elderly or disabled family members.”
Chapter 12	Termination of Assistance and Tenancy 12-II.D. Criteria for Deciding to Terminate Assistance Consideration of Circumstances	Add: “While a record or records of arrest will not be used as the sole basis for termination, an arrest may, however, trigger an investigation to determine whether the participant actually engaged in disqualifying criminal activity. As part of its investigation, AHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest. AHA may also consider: • Any statements made by witnesses or the participant not included in the police report • Whether criminal charges were filed • Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal • Any other evidence relevant to determining whether or not the participant engaged in disqualifying activity Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property.”
Chapter 13	Owners 13-II.E. HAP Contract Term and Terminations	Add: “AHA cannot make any HAP payment for any month after the month the family vacates the unit. The owner is not entitled to any housing assistance payment after this period and must return to AHA any housing assistance payment received after this period.”

Chapter 14	Program Integrity 14-II.D. AHA-Caused Errors or Program Abuse	Add: “**De Minimis Errors [24 CFR 5.609(c)(4)]** AHA will not be considered out of compliance when making annual income determinations solely due to de minimis errors in calculating family income. A de minimis error is an error where AHA determination of family income deviates from the correct income determination by no more than $30 per month in monthly adjusted income ($360 in annual adjusted income) per family. PHAs must take corrective action to credit or repay a family if the family was overcharged rent, including when PHAs make de minimis errors in the income determination. Families will not be required to repay AHA in instances where AHA miscalculated income resulting in a family being undercharged for rent. PHAs state in their policies how they will repay or credit a family the amount they were overcharged as a result of AHA’s de minimis error in income determination.”
		Remove: “**Repayment to AHA** Neither a family nor an owner is required to repay an overpayment of subsidy if the error or program abuse is caused by AHA staff [HCV GB. 22-12].”
Chapter 15	Special Housing Types 15-IV.A.Overivew	Add: “AHA will provide information to families regarding the shared housing option at briefing but will not provide any listings or information of housing matching services in the community.” “Although AHA will not seek out solutions within the jurisdiction, AHA will inform HUD if the AHA encounters barriers to shared housing that conflict with fair housing laws.”
Chapter 15	Special Housing Types 15-VI.C. Payment standard, Utility Allowance and HAP Calculation Distribution of HAP	Add: “If the housing assistance payment exceeds the portion of the monthly rent due to the owner, AHA will pay the balance to the family.”

Chapter 15	Special Housing Types 15-VI.C. Payment standard, Utility Allowance and HAP Calculation Single HAP to Family	Add: "AHA will not exercise the option to pay a single HAP and will pay HAP directly to the owner."
Chapter 16	Program Administration 16-II.B. Payment Standards Small Area FMR PHA's	Add: "AHA is not a mandatory SAFMR PHA AHA will not voluntarily adopt the use of SAFMRs except to establish exception payment standards in certain ZIP code areas."
Chapter 16	Program Administration 16-II.B. Payment Standards Designated Payment Standard Areas	Add: "AHA has not established any designated payment standard areas."
Chapter 16	Program Administration 16-II.B. Payment Standards Exception Payment Standards for VASH	Add: "AHA has not established exception payment standards."
Chapter 16	Program Administration 16-II.B. Payment Standards Updating Payment Standards	Add: "AHA will review the appropriateness of the payment standards on an annual basis when the new FMR is published, and at other times as determined necessary. In addition to ensuring the payment standards are always within the "basic range," AHA will consider the following factors when determining whether an adjustment should be made to the payment standard schedule: **Funding Availability**: AHA will review projected HAP expenditures to determine the impact projected subsidy adjustments will have on funding available for the program and the number of families served. AHA will compare the number of families who could be served under revised payment standard amounts with the number assisted under current payment standard amounts. **Rent Burden of Participating Families:** Rent burden will be determined by identifying the percentage of families, for each unit size, that are paying more than 30 percent of their monthly adjusted income as the family share. When 40 percent or more of families, for any given unit size, are paying more than 30 percent of adjusted monthly income as the family share, AHA will consider increasing the payment standard. In evaluating rent

		burdens, AHA will not include families renting a larger unit than their family unit size. **Quality of Units Selected**: AHA may review the quality of units selected by participant families when making the determination of the percent of income families are paying for housing, to ensure that payment standard increases are only made when needed to reach the mid-range of the market. **Changes in Rent to Owner**: AHA may review a sample of the units to determine how often owners are increasing or decreasing rents and the average percent of increases and decreases by bedroom size. **Unit Availability:** AHA may review the availability of units for each unit size, particularly in areas with low concentrations of poor and minority families. **Lease-up Time and Success Rate**: AHA may consider the percentage of families that are unable to locate suitable housing before the voucher expires and whether families are leaving the jurisdiction to find affordable housing. Effective dates of changes to payment standard amounts will be determined at the time of update. AHA will always ensure the payment standards will be within the basic range. AHA will post its payment standards schedule on AHA's website and include a copy in the voucher briefing materials."
Chapter 16	Program Administration 16-II.C. Utility Allowances Energy Efficient Utility Allowance	Add: "AHA will not maintain an energy efficient utility allowance schedule."
Chapter 16	Program Administration 16-II.C. Utility Allowances Air Conditioning	Add: "The majority of housing units in AHA's jurisdiction does not include central air-conditioning and is not wired for tenant-installed air conditioners. Therefore, AHA has not included an allowance for air-conditioning in its utility allowance schedule."
Chapter 16	Program Administration 16-III.B. Informal Reviews Scheduling an Informal Review	Add: "If the informal review will be conducted remotely, at the time AHA notifies the family of the informal review, the family will be informed:

		Regarding the processes to conduct a remote informal review; That, if needed, AHA will provide technical assistance prior to and during the informal review; and That if the family or any individual witness has any technological, resource, or accessibility barriers preventing them from fully accessing the remote informal review, the family may inform AHA and AHA will assist the family in either resolving the issues or allow the family to participate in an in-person informal review, as appropriate.”
Chapter 16	Program Administration 16-III.B. Informal Reviews Remote Informal Reviews	Add: “AHA has the sole discretion to require that informal reviews be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster. In addition, AHA will conduct an informal review remotely upon request of the applicant as a reasonable accommodation for a person with a disability, if an applicant does not have childcare or transportation that would enable them to attend the informal review, or if the applicant believes an in-person informal review would create an undue health risk. AHA will consider other reasonable requests for a remote informal review on a case-by-case basis.”
Chapter 16	Program Administration 16-III.B. Informal Reviews Conducting Remote Informal Reviews	Add: “AHA will conduct remote informal reviews via a video conferencing platform, when available. If, after attempting to resolve any barriers, applicants are unable to adequately access the video conferencing platform at any point, or upon applicant request, the informal review will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote informal review will be postponed, and an in-person alternative will be provided promptly within a reasonable time. At least five business days prior to the scheduled remote review, AHA will provide the family with login information and/or conferencing call-in information and an electronic and/or physical copy of all materials being presented via first class mail

		and/or email. The notice will advise the family of technological requirements for the informal review and request the family notify AHA of any known barriers. AHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person informal review. If the informal review is to be conducted remotely, AHA will require the family to provide any documents directly relevant to the informal review at least 24 hours before the scheduled review through the mail, via email, or text. AHA will scan and email copies of these documents to AHA representative the same day. Documents will be shared electronically whenever possible. AHA will follow up the email with a phone call and/or email to the applicant at least one business day prior to the remote informal review to ensure that the applicant received all information and is comfortable accessing the video conferencing or call-in platform. AHA will ensure that all electronic information stored or transmitted with respect to the informal review is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP."
Chapter 16	Program Administration 16-III.C. Informal Hearings for Participants Remote Informal Hearings	Add: "AHA has the sole discretion to require that informal hearings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster. In addition, AHA will conduct an informal hearing remotely upon request as a reasonable accommodation for a person with a disability, if a participant does not have childcare or transportation that would enable them to attend the informal hearing, or if the participant believes an in-person hearing would create an undue health risk. AHA will consider other reasonable requests for a remote informal hearing on a case-by-case basis."
Chapter 16	Program Administration 16-III.C. Informal Hearings for Participants	Added same policy as above under conducting Remote Informal Reviews.

	Conducting Informal Hearings Remotely	
Chapter 16	Program Administration 16-III.C. Informal Hearings for Participants Informal Hearing Procedures-Notice to the family	“In cases where AHA makes a decision for which an informal hearing must be offered, the notice to the family will include all of the following:” Added: “that the family may request a remote informal hearing.”
Chapter 16	Program Administration 16-III.C. Informal Hearings for Participants Scheduling an Informal Hearing	Added: “If AHA hearing will be conducted remotely, at the time the notice is sent to the family, the family will be notified: • Regarding the processes involved in a remote informal hearing; • That AHA will provide technical assistance prior to and during the informal hearing, if needed; and • That if the family or any individual witness has any technological, resource, or accessibility barriers, the family may inform AHA and AHA will assist the family in either resolving the issue or allow the family to participate in an in-person hearing, as appropriate.”
Chapter 16	Program Administration 16-III.C. Informal Hearings for Participants Pre-Hearing Right to Discovery	Add: “If the hearing will be conducted remotely, AHA will compile a hearing packet, consisting of all documents AHA intends to produce at the informal hearing. AHA will mail copies of the hearing packet to the family, the family’s representatives, if any, and the hearing officer at least three days before the scheduled remote informal hearing. The original hearing packet will be in the possession of AHA representative and retained by AHA. Documents will be shared electronically whenever possible.” Add: “For in-person hearings, AHA will not require pre-hearing discovery by AHA of family documents directly relevant to the hearing. If the informal hearing is to be conducted remotely, AHA will require the family to provide any documents directly relevant to the informal hearing at least 24 hours before the scheduled hearing through the mail, via email, or text. AHA will scan and

		email copies of these documents to the hearing officer and AHA representative the same day. Documents will be shared electronically whenever possible.”
Chapter 16	Program Administration 16-III.C. Informal Hearings for Participants Issuance of Decision	Under Hearing Officer’s Decision add, “Issuance of Decision. A copy of the hearing order must be furnished promptly to the family. AHA Policy: The hearing officer will submit a “Notice of Hearing Decision” to AHA via email, in person or by first-class mail. AHA will in turn forward a copy of the hearing officer’s “Notice of Final Decision” to the participant either via email or by first-class mail. A copy of this notice will be maintained in AHA’s file.”
Chapter 16	Program Administration 16-III.C. Informal Hearings for Participants Issuance of Decision	Under Issuance of Decision add “Effect of Final Decision. AHA is not bound by the decision….If AHA determines it is not bound by the hearing officer’s decision…AHA will amil a “Notice of Final Decision to the participant. The Notice of Final Decision will be sent by email or by first-class mail. A copy of this notice will be maintained in AHA’s file.
Chapter 16	Program Administration Part IV: Owner or Family Debts to AHA Criminal Prosecution for Program Fraud/Abuse	Add AHA Policy: “AHA will consult with the HUD field Office and regional OIG Special Agent in Charge (SAC) to determine whether it will refer the matter to the state or local district attorney to pursue criminal fraud charges.”
Chapter 16	Program Administration Part IV: Owner or Family Debts to AHA Refusal to Enter Into an Agreement	Add AHA policy: “When a family refuses to repay monies owed to AHA, in addition to termination of program assistance, AHA will utilize other available collection alternatives including, but not limited to, the following: • Collection agencies • Small claims court • Civil lawsuit • State income tax set-off program
Chapter 16	Program Administration Part VI: Record Keeping 16-VI.B. Record Retention	Add: “AHA will keep indefinitely, Records of all complaints, investigations notices, and corrective actions related to violations of the Fair Housing Act, the equal access final rule, or VAWA.”

Chapter 17	Project Based Vouchers Part I: General Requirements 17-I.B. PBV Definitions	Under the term “Project” add AHA Policy: “AHA will not define circumstances that limit the definition of the term project.”
Chapter 17	Project Based Vouchers Part I: General Requirements 1.A. Overview Additional Project-Based Units	Add: “AHA will project-base up to an additional 10 percent of its authorized units, up to 30 percent, in accordance with HUD regulations and requirements. **Homeless Individuals and Families** AHA will have units specifically made available to housing individuals and families that meet the definition of *homeless* under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3. A *homeless individual or family* is one who lacks a fixed, regular, and adequate nighttime residence and has a primary nighttime residence that is: A supervised public or privately operated shelter designated to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill; An institution that provides temporary residence for individuals intended to be institutionalized; or A public or private place not designed for or ordinarily used as a regular sleeping accommodation for humans. Any individual or family who is fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions in the individual’s or family’s current housing situation, including where the health and safety of the children are jeopardized, and who have no other residence and lack the resources or support networks to obtain other permanent housing are also considered homeless under this definition. Also considered homeless are unaccompanied youth under 25 years of age, or families with children and youth, who do not

		otherwise qualify as homeless under section 103 of the McKinney-Vento Homeless Assistance Act definition, but who: 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. 1437e-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. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); 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; 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 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; or Any individual or family who: 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 a 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; Has no other residence; and

		Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing
Chapter 17	Project Based Vouchers Part III: Dwelling Units Alternative Inspections for Periodic Inspections	Add: "AHA will not rely on alternative inspection standards."
Chapter 17	Project Based Vouchers Part III: Dwelling Units Interim Inspections	Add: "During an interim inspection, AHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional deficiencies that are observed and will require the responsible party to make the necessary repairs. If the periodic inspection has been scheduled or is due within 90 days of the date the special inspection is scheduled AHA may elect to conduct a full inspection."
Chapter 17	Project Based Vouchers Part IV: Rehabilitated and Newly Constructed Units 17-IV.B. Agreement to Enter Into a HAP Contract (AHAP) PHA Discretion Not to Use an AHAP	Add: "AHA will not exercise its discretion to not use an AHAP or to execute an AHAP after construction or rehabilitation."
Chapter 17	Project Based Vouchers 17-V.C. Termination of the HAP Contract Enforcement of NSPIRE Standards	Add: "AHA will waive the owner's responsibility for housing quality standards deficiencies that have been determined to have been caused by the tenant, any member of the household, or any guest or other person under the tenant's control, to the extent the tenant can be held responsible for ensuring that the deficiencies are corrected: the tenant must take all necessary steps permissible under the lease and state and local law to remedy the deficiency. This may include paying the owner for the cost of the necessary repairs in accordance with the lease."
Chapter 17	Project Based Vouchers 17-V.C. Termination of the HAP Contract Family Obligations	Add: "Damages beyond ordinary wear and tear will be considered to be damages which could be assessed against the security deposit under state law or in court practice."
Chapter 17	Project Based Vouchers 17-V.C. Termination of the HAP Contract PHA Remedies	Add: "The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies housing

		quality standards failures, AHA will determine (1) whether or not the failure is a life-threatening condition and (2) whether the family or owner is responsible. AHA will not withhold assistance payments upon notification to the owner of the deficiencies. When life-threatening conditions are identified, AHA will immediately notify both parties by telephone or email. The notice will specify who is responsible for correcting the violation. The corrective actions must be taken within 24 hours of AHA's notice. When failures that are not life-threatening are identified, AHA will send the owner and the family a written notification of the inspection results within five business days of the inspection. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. Generally, not more than 30 days will be allowed for the correction. If the owner is responsible for correcting the deficiency, the notice of inspection results will inform the owner that if life-threatening conditions are not corrected within 24 hours, and non-life-threatening conditions are not corrected within the specified time frame (or any PHA-approved extension), the owner's HAP will be abated. Likewise, if the family is responsible for correcting the deficiency, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved extension, if applicable) the family's assistance will be terminated in accordance with PHA policy (see Chapter 12)."
Chapter 17	Project Based Vouchers 17-V.C. Termination of the HAP Contract HAP Withholding	Add: "AHA will not withhold assistance payments upon notification to the owner of the deficiencies."
Chapter 17	Project Based Vouchers 17-V.C. Termination of the HAP Contract HAP Abatement	Add: "AHA will make all HAP abatements effective the first of the month following the expiration of AHA-specified correction period (including any extension).

		AHA will abate payments only for those contract units that do not meet housing quality standards. AHA will inspect abated units within five business days of the owner's notification that the work has been completed. Payment will resume effective on the day the unit passes inspection."
Chapter 17	Project Based Vouchers 17-V.C. Termination of the HAP Contract Failure to Make Repairs	Add: "AHA will issue a family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame a voucher no later than 30 days prior to the termination of the HAP contract. The initial term of the voucher will be 90 calendar days. No briefing is required for these families. In order to receive tenant-based assistance under the HCV program, the family must submit a Request for Tenancy Approval and proposed lease within the 90-day period, unless AHA grants an extension. AHA will follow the policies set forth in Chapter 5 on voucher extension and expiration."
Chapter 17	Project Based Vouchers 17-V.C. Termination of the HAP Contract Offer of Public Housing	Add: "AHA does not operate any public housing units."
Chapter 17	Project Based Vouchers 17-V.C. Termination of the HAP Contract Relocation Assistance	"AHA will not assist families relocating due to the HAP contract being terminated as a result of the owner failing to make required repairs within the required time frame in finding a new unit."
Chapter 17	Project Based Vouchers 17-V.D. Amendments to the HAP Contract to Add or Substitute Units	Add: "AHA will add units to the contract on a case-by-case basis to ensure the availability of affordable housing as long as the addition of units does not exceed allowable project caps."
Chapter 17	Project Based Vouchers 17-VI.C. Organization of the Waiting List	Change "AHA will establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance" to " AHA will establish one waiting list for the AHA's entire PBV program that is separate from the waiting list for the HCV program."
Chapter 17	Project Based Vouchers 17-VI.C. Organization of the Waiting List	Change "AHA will provide a selection preference when required by the regulation (e.g., eligible in-place families, qualifying families for "excepted units," mobility impaired persons for accessible units). AHA will not offer any additional preferences for the PBV program or for particular PBV projects or units" to "AHA will provide a selection

		preference when required by the regulation (e.g., eligible in-place families, qualifying families for “excepted units,” mobility impaired persons for accessible units). AHA will offer additional preferences for the PBV program to applicants who may be elderly or disabled or who have been referred by the City of Arvada Housing Navigator.”
Chapter 17	Project Based Vouchers 17-VI.D. Owner-Maintained Waiting Lists	Add: “AHA will not allow for any owner-maintained waiting lists. AHA will operate all waiting lists.”
Chapter 17	Project Based Vouchers 17-VI.F. Offer of PBV Assistance or Owner’s Rejection Refusal of Offer	Add: “AHA will define good cause for rejection of a unit offer as any of the factors listed above.” “An applicant will be allowed to reject a unit without good cause a maximum of two times before removal from the PBV waiting list.”
Chapter 17	Project Based Vouchers 17-VIII.C Determination of Rent to Owner OCAF	Add: “AHA will not allow for rent increases via OCAF. All rent increases mut be requested by the owner as outlined below.”
Chapter 17	Project Based Vouchers 17-VIII.C Determination of Rent to Owner Minimum Rent	Remove: “The minimum rent is waived ($0) in the AHA Project Based Voucher program.”
Chapter 17	Project Based Vouchers 17-IX.B. Vacancy Payments	Add: “If AHA determines that the owner is responsible for a vacancy and, as a result, is not entitled to the keep the housing assistance payment, AHA will notify the landlord of the amount of housing assistance payment that the owner must repay. AHA will require the owner to repay the amount owed in accordance with the policies in Section 16-IV.B.” Add: “AHA will decide on a case-by-case basis if AHA will provide vacancy payments to the owner. The HAP contract with the owner will contain any such agreement, including the amount of the vacancy payment and the period for which the owner will qualify for these payments.”
Chapter 17	Project Based Vouchers IX.C. Tenant Rent to Owner	Changed “AHA will make utility reimbursements directly to the family” to “AHA will make utility reimbursements directly to

	Utility Reimbursements	the utility company. In the instances where a family is billed for all utilities through the property in which they reside and they do not have an account with a utility company, AHA will make utility reimbursements directly to the family."
Chapter 17	Exhibit 17-1 PBV Development Information	Revised Structure of Exhibit. Added Marshall Pointe
Chapter 19	Special Purpose Vouchers	Add: "AHA will administer the following types of special purpose vouchers: Mainstream."
Chapter 19	Special Purpose Vouchers III-A. Waiting List Applicant Selection & preferences	Change "AHA will maintain only one tenant-based voucher assistance waiting list from which Mainstream Program applicants will be pulled. AHA will apply all required HUD regulations governing the administration of AHA's Housing Choice Voucher waiting list to the MHCVP" to "AHA will establish a separate waiting list for the Mainstream program. All AHA policies on opening, closing, and updating the waiting list in Chapter 4 will also apply to the Mainstream waiting list."
Chapter 19	Special Purpose Vouchers III-B. Waiting List Applicant Selection and Preferences	Remove the word "equally weighted" preferences from the following policy: "AHA has added two equally weighted preferences to the HCV waiting list that will facilitate the selection of "non-elderly disabled" applicants eligible for the Mainstream Voucher Program. These preferences are: *(1) Currently experiencing homelessness* *(2) At-risk of homelessness*"
Chapter 19	Special Purpose Vouchers III-C. Updating the Waiting List	Removed
Chapter 19	Special Purpose Vouchers III.C. Updating the Waiting List Updating Waiting List for change in eligible populations	Removed
Chapter 19	19-IV.F. Voucher Issuance Initial Search Term	Add: "The initial voucher term for all Mainstream vouchers, including those issued when a family wishes to exercise portability, will be 120 days."
Chapter 19	19-IV.F. Voucher Issuance Voucher Extension	Add: "At least 30 days prior to the expiration of the initial term of the voucher, AHA will contact the family to remind them of the expiration

		date of their voucher, the process for requesting an extension, and to inquire if the family needs assistance with their housing search. Depending on the family's preferred method of communication, AHA may contact the family via telephone, text message, email, or other accessible communication method. AHA will ensure effective communication with persons with disabilities, including those with vision, hearing, speech, intellectual or other developmental disabilities, or any other communication-related disabilities. Families may request an extension, either orally or in writing, at any time prior to the expiration of the family's voucher. All requests for extensions will automatically be granted without the requirement for the family to provide documentation. The initial extension period will be for 90 days. If the family requires additional extensions beyond 90 days, the family may request additional extensions, either orally or in writing, at any time prior to the expiration of the extended voucher term. All subsequent extensions will also be for a period of 90 days and will not require the family to meet certain circumstances or provide documentation. Each time the family requests an extension, AHA will inquire if the family needs assistance with their housing search and will provide a current listing of available accessible units known to AHA."
Glossary	Glossary	Updated
Appendix	HOTMA Appendix to Administrative Plan	Added

CITY OF ARVADA

REPORT TO HOUSING AUTHORITY	AGENDA ITEM VIII.2.

TO: THE HONORABLE CITY COUNCIL DATE: July 1, 2025

SUBJECT: Arvada Housing Authority 2026 Annual Plan

Report in Brief

PRESENTER: Carrie Espinosa

The Arvada Housing Authority (AHA) must submit a 5 Year Public Housing Authority Plan once every 5th housing authority fiscal year and an Annual Plan every year. The Plans inform the U.S. Department of Housing and Urban Development (HUD), residents, and the public of strategies that address the needs of people serviced through the programs. The 5 Year Plan described the Housing Authority's mission, goals and objectives and the Annual Plan covers policies and procedures. Both are official documents submitted to and reviewed by the local HUD office. The Arvada Housing Authority's 5 Year Plan was approved by the Board and submitted to HUD last year. It is time for the submission of the 2026 AHA Annual Plan. The Housing team drafted the Plan and is recommending board approval.

Financial Impact

There is no fiscal impact related to the agenda item.

Background

The Arvada Housing Authority must comply with the U.S. Department of Housing and Urban Development (HUD) requirements regarding activities as a Public Housing Authority (PHA), including developing a 5-year PHA Plan and an Annual Plan. The statements and policies outlined in the Annual Plan all reflect the accomplishments of the 5-year plan goals and objectives. Taken as a whole, these policies and accomplishments outline a comprehensive approach consistent with the City of Arvada's Consolidated Plan and the Arvada Housing Strategic Plan. As part of the 5-Year and Annual Plan review process, AHA appoints a Resident Advisory Board that reviews and comments on components of both Plans and the AHA Administrative Plan. The current Annual Plan expires in December 2025. The Housing team drafted the 2025 Annual Plan for board approval.

Discussion

The 2020 and 2024 Arvada Housing Needs Assessment identified the top housing needs in the city. One of the top needs was affordable housing options for households earning $35,000 or less. The Arvada Housing Authority's Housing Choice Voucher Program and partnerships with service providers and affordable housing developers target households at the very low and extremely low income levels, making the Housing Authority's programs and partnerships a critical resource for the community.

Public Contact

The 2026 Arvada Housing Authority Annual Plan was made available for public comment from May 8 to May 30, 2025. The Housing Authority Resident Advisory Board also had the opportunity to review and make comments.

Commission Recommendation

N/A

Strategic Alignment

The Arvada Housing Authority Administrative Plan supports the Housing goal identified in the City of Arvada Strategic Plan-Improve access to diverse, safe and affordable housing options and programs, providing residents with opportunities to obtain housing that meets their needs in all phases of life.

Alternative Courses of Action

N/A

Recommendation for Action

The Arvada team recommends approval of the Arvada Housing Authority 2026 Annual Plan.

Suggested Motion:

I move that the Arvada Housing Authority 2026 Annual Plan be (approved) (rejected).

Prepared by:
Carrie Espinosa, Manager of Housing Preservation and Resources

Reviewed by:

Approved by:

Carrie Espinosa, Manager of Housing Preservation and Resources	6/9/2025
Jessica Garner, Director of Community and Economic Development	6/9/2025
Bryan Archer, Director of Finance	6/10/2025
Gail Walker, Legal Specialist-Contracts	6/10/2025
Erika Pierce, Litigation Paralegal	6/10/2025
Megan McCall, Assistant City Attorney II	6/11/2025
Rachel Morris, City Attorney	6/13/2025
Linda Haley, Deputy City Manager	6/14/2025
Don Wick, City Manager	6/17/2025

Enclosure, exhibits & attachments required to support the report

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan
(All PHAs)

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

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

I, ______________________________, the ______________________________________
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years ______ and/or Annual PHA Plan for fiscal year _______ of the ____ is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

____
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

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

Name of Authorized Official:	Title:
Signature:	Date:

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Certifications of Compliance with PHA Plan and Related Regulations ***(Standard, Troubled, HCV-Only, and High Performer PHAs)***	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **OMB No. 2577-0226** **Expires 3/31/2024**

PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

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

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
   (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
   (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
   (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
   - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).

9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act**,** the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

______________________________ ______________________________

PHA Name PHA Number/HA Code

_____ Annual PHA Plan for Fiscal Year 20____

_____ 5-Year PHA Plan for Fiscal Years 20____ - 20____

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

Name of Executive Director		Name Board Chairman	
Signature	Date	Signature	Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Civil Rights Certification
(Qualified PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 3/31/2024

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan , hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning ________________________ in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 *et seq*.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

______________________________ PHA Name

______________________________ PHA Number/HA Code

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

Name of Executive Director:	Name of Board Chairperson:
Signature Date	Signature Date

The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Streamlined Annual PHA Plan *(High Performer PHAs)*	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 09/30/2027

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services. They also inform HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-, very low-, and extremely low- income families.

Applicability. The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form. PHAs with zero public housing units must continue to comply with the PHA Plan requirements until they closeout their Section 9 programs (ACC termination).

Definitions.

(1) ***High-Performer PHA*** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers (HCVs) and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, SEMAP for PHAs that only administer tenant-based assistance and/or project-based assistance, or PHAS if only administering public housing.

(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.

(3) ***Housing Choice Voucher (HCV) Only PHA*** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.

(4) ***Standard PHA*** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.

(5) ***Troubled PHA*** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.

(6) ***Qualified PHA*** - A PHA with 550 or fewer public housing dwelling units and/or HCVs combined and is not PHAS or SEMAP troubled.

A.	PHA Information.
A.1	**PHA Name**: Arvada Housing Authority **PHA Code**: CO050 **PHA Plan for Fiscal Year Beginning**: (MM/YYYY): 01/2026 **PHA Inventory** (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) **Number of Public Housing (PH) Units** 0 **Number of Housing Choice Vouchers (HCVs)** 562 **Total Combined** 562 **PHA Plan Submission Type:** ☑ Annual Submission ☐ Revised Annual Submission **Public Availability of Information.** In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans. The Arvada Housing Authority Annual Plan and the Arvada Housing Authority Administrative Plan are retained in the offices of the Housing Preservation Resources Division of the City of Arvada at 8101 Ralston Rd, Arvada, CO 80002. Both plans are made available to citizens or entities requesting to view the plan. Both will also be available in electronic format on the Arvada Housing Authority section of the City of Arvada's website at arvadaco.gov.

	☐ **PHA Consortia**: (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B.	**Plan Elements**

B.1 **Revision of Existing PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA Plan** submission?

Y	N	
☐	☑	Statement of Housing Needs and Strategy for Addressing Housing Needs.
☐	☑	Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
☐	☑	Financial Resources.
☐	☑	Rent Determination.
☐	☑	Homeownership Programs.
☐	☑	Safety and Crime Prevention.
☐	☑	Pet Policy.
☐	☑	Substantial Deviation.
☑	☐	Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each element below:

The Arvada Housing Authority Administrative Plan has been significantly amended as needed to bring existing policies into compliance with the HOTMA voucher final rule. Some of the changes will become effective 7/1/25. Others are on hold, awaiting further direction from HUD. See attached list of proposed changes to the 2025 Arvada Housing Authority Administrative Plan.

(c) The PHA must submit its Deconcentration Policy for Field Office Review.

B.2	**New Activities.** (a) Does the PHA intend to undertake any new activities related to the following in the PHA's applicable Fiscal Year? Y N ☐ ☑ Choice Neighborhoods Grants. ☐ ☑ Modernization or Development. ☐ ☑ Demolition and/or Disposition. ☐ ☑ Conversion of Public Housing to Tenant Based Assistance. ☐ ☑ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☐ ☑ Homeownership Program under Section 32, 9 or 8(Y) ☐ ☑ Project Based Vouchers. ☐ ☑ Units with Approved Vacancies for Modernization. ☐ ☑ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the applicable Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

B.3	**Progress Report.**

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

Arvada's Comprehensive Plan (completed in 2014) outlines the City's vision for growth and change through 2034. The Plan includes the following vision for neighborhoods and housing:

- Plan for a range of neighborhoods and accessible housing of different tenure types to accommodate diverse incomes and all ages and abilities.
- Encourage development of workforce, affordable and assisted housing throughout Arvada.
- Maintain and improve the quality of the existing housing stock in Arvada and revitalize the physical and social fabric of neighborhoods that are in decline.
- Provide opportunities for special needs and senior housing in Arvada.

The Arvada Housing Authority will follow the goals and objectives identified in the City of Arvada Housing Strategic Plan and adopted by the Arvada City Council on May 20, 2024.

Housing Goal #1: Continue existing federal/state program partnerships

The City of Arvada Housing Division and the Arvada Housing Authority currently support affordable housing, community development, and homelessness prevention through grant partnerships. This includes the management of Community Development Block Grant funds (CDBG), as well as applying for other state and federal funds, including Proposition 123 Funds. This also includes the use of Housing Choice Vouchers to support very low income households and Project-Based Vouchers to support households in specific developments.

Progress:
Energy/Mineral Impact Assistance Fund Grant (EIAF) - $2,000,000
In July of 2024, the Colorado Department of Local Affairs (DOLA) awarded $2M to the City of Arvada to apply to the payment of the Marshall Pointe Apartments tap and sewer fees. Marshall Pointe Apartments will provide 260 units of affordable housing in southeast Arvada.

Section 8 Project Based Voucher Deployment – Marshall Pointe
The Arvada Housing Authority awarded eight (8) Projected-Based Vouchers (PBVs) to the Marshall Pointe project. These vouchers will cover rent for eight extremely-low-income families. These families will also be eligible for additional supportive services at the project. The rental revenue generated by the vouchers for the project will be set at 120% Area Median Income.

Community Development Block Grant (CDBG) – Habitat for Humanity Townhomes
The City has awarded $407,000 of its 2023 CDBG allocation to Habitat for Humanity for its affordable homeownership townhome project.

Letters of Support for Upcoming Projects
An important function of the Housing Division and Housing Authority is to vet upcoming projects and provide letters of support to help developers demonstrate community buy-in when applying for grants and loans from Federal, State, and nonprofit organizations. While these letters do not indicate a contract or executed commitment, they can signal to grantors that the City has reviewed the project, is preliminarily supportive, and may offer some assistance at a later date. This gives grantors confidence that if they were to grant funds to this project, its likelihood of coming to fruition is high. The Arvada Housing Authority has provided these letters for a project for Beyond Home, and an upcoming workforce development.

Housing Goal #2: Continue to allocate publicly owned land (and/or acquire properties) for affordable and mixed income housing.

The Housing Authority has, in the past, donated land to affordable housing nonprofit organizations. To continue this initiative, it was recommended that the City create a land banking program where existing publicly owned land may be allocated to housing initiatives through a ground lease or donation. This may include a feasibility analysis of land already owned, as well as purchasing new properties to reserve them for housing.

Proposition 123 – Land Banking
On February 10, 2025, the Housing Division introduced the concept of a land banking program to the City Council. As the City does not have a self-development arm, land banking is a way for the City to directly participate in and control housing production for identified needs in the community, without creating a new department, or taking on significant liability. Some of the feedback from the Council included a desire to ensure that capitalized ground leases reimbursed

the City for carrying costs of the land if the land was purchased using a grant.

Denver Regional Council of Governments Livable Centers Small-Area-Planning Grant -$140,000
In December of 2024, the City was awarded the Denver Regional Council of Governments Livable Centers Small-Area-Planning Grant to conduct a housing and development study targeted to Arvada's public transit corridors (i.e. a Transit Oriented Development (TOD) study). The resulting report will help the City identify appropriate parcels for TOD housing, recommend a type of housing for the areas, and project the necessary infrastructure needed to support this development. Such information will be crucial if the City is to acquire new land for housing development.

Housing Goal #3: Create a dedicated, sustainable revenue source to fund the Arvada Affordable Housing Fund (AAHF).

The City has recently formalized its monetary support for housing initiatives through the creation of the Arvada Affordable Housing Fund (AAHF), where it can provide gap financing to housing projects that align with the City's goals. Funding goals are reviewed annually by the Housing Advisory Committee (HAC). Currently, the fund is replenished through Special Limited Partnership Payments and interest generated on the loans. This is a financially unsustainable model. The AAHF is one of the most powerful tools the City has at its disposal to encourage and direct private sector development activities to provide what the City needs. As such, the AAHF may require an alternative source of income.

This is a high-priority strategy in terms of its potential impact on the City's ability to support, encourage, and exert control over the supply of the particular type of housing identified in the 2024 Housing Needs Assessment, but may require a long-term implementation plan. The Housing Division hopes to continue its positive track record of providing loans to targeted projects to demonstrate the importance of this initiative.

Housing Goal #4: Invest in the production of income-restricted housing.

The City will continue to encourage and support projects using resources from the AAHF, offering partnerships for grants, attaching PBVs to projects, and providing Special Limited Partnerships, where appropriate.

Marshall Pointe
In January 2025, the Housing Division brought the Marshall Pointe Affordable Housing Development Project to City Council to approve and finalize the conditional support offered to the project, closing the financing gap, and allowing it to begin construction. The 260 unit Low-Income-Housing-Tax-Credit (LIHTC) project will be income restricted to less than 80% Area Median Income (AMI), with an income average of 60% AMI for the next 30 years. These units fulfill the identified housing needs from the 2024 Housing Needs Assessment and complete the City's affordable housing unit commitment to the State as a requirement of opting into Proposition 123.

To make this development possible, the City provided: an $850,000.00 subordinate gap financing loan from the AAHF, a grant partnership, eight PBVs, and a Special Limited Partnership (SLP), exempting the property from state and local taxes in lieu of an SLP Fee. The project closed on February 6, 2025, and will take three years to construct and fully lease.

Housing Goal #5: Invest in the preservation of affordable housing.

The City will begin to examine and work on strategies to help preserve the low to moderate income market rate properties that already exist in Arvada. This will likely require a set of strategies, but will, preliminarily include: partnerships with existing income-restricted properties that are reaching the end of their compliance period, housing acquisition/rehabilitation, partnerships with nonprofits who are already working in this space, and maintaining a database of known low to moderate income units. Naturally Occurring Affordable Housing (NOAH) Preservation is a widely discussed issue across the State and is one that is of particular importance to the residents of Arvada. In the coming year, the Housing Division plans to work with the HAC and other municipalities facing this challenge to develop a set of strategies for the City to pursue.

Housing Goal #6: Add staff capacity to support the implementation of the Plan.

The implementation of some of these strategies may require additional staffing at a later date.

Housing Goal #7: incorporate additional incentives for income-restricted development (and update definition of "affordable" in the Code).

The City is to create a fast-track review process for affordable residential projects within the City, both to satisfy

Proposition 123 requirements and to reduce the predevelopment costs incurred with lengthy permitting processes. It was also recommended that the City include a definition of "affordable" in its code, and ensure it encompasses for-sale affordable properties as well. Once affordable is recognized as its own category of residential development, the City can extend aesthetic design alternatives, parking relief, and density bonuses to make affordable projects more financially feasible.

Land Use Development Code (LDC) Update
Recently passed state legislation has provided an opportunity for the City to implement changes to the LDC which can help the City meet its identified housing needs. The Planning Division has taken the lead on this initiative, though the Housing Advisory Committee (HAC) has been brought in to provide feedback and recommendations on the specific aspects of the proposed changes that would impact the production of housing. The HAC held a Special Meeting on April 14, 2025 to discuss these changes and their recommendations were circulated to Council via memo.

Housing Goal #8: Implement land use recommendations from the Jeffco Housing Advocacy Steering Committee on workforce housing.

When considering code and zoning changes, the City is advised to align itself, where appropriate, with the recommendations of the Jeffco Housing Advocacy Steering Committee. Some of these recommendations include additional land zoned for mulit-family housing, lowering the minimum lot size for single family, increasing lot coverage limits, and allowing the conversion of commercial building to multi-family housing.

This strategy cannot be implemented until City Council decides on the adoption of LDC changes mandated by the state.

Housing Goal #9: Explore affordable requirements in new development (e.g, linkage fess and/or inclusionary zoning).

The City is advised to consider adding programs, fees, and inclusionary requirements to new development. More research would need to be undertaken to execute this step. Any new requirements will require a nexus study. The Housing Division is prepared to pursue this study but understands that it may not be a top priority for the coming year.

B.4	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. The Arvada Housing Authority 5 year plan was submitted to HUD on October 16, 2024 and was accepted on January 7, 2025.
B.5	**Most Recent Fiscal Year Audit**. (a) Were there any findings in the most recent FY Audit? Y N ☐ ☑ (b) If yes, please describe:
C.	**Other Document and/or Certification Requirements.**
C.1	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) have comments to the PHA Plan? Y N ☐ ☑ (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

C.2	**Certification by State or Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	**Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Form 50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	**Challenged Elements.** If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y N ☐ ☑ (b) If yes, include Challenged Elements.

D.	**Affirmatively Furthering Fair Housing (AFFH).**
D.1	**Affirmatively Furthering Fair Housing.** **Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.**
	Fair Housing Goal: ***Describe fair housing strategies and actions to achieve the goal***
	Fair Housing Goal: ***Describe fair housing strategies and actions to achieve the goal***
	Fair Housing Goal: ***Describe fair housing strategies and actions to achieve the goal***

Instructions for Preparation of Form HUD-50075-HP
Annual Plan for High Performing PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no."

☐ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions**. Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. 24 CFR §903.7(b) Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. 24 CFR §903.7(b) A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b) Describe the unit assignment policies for public housing. 24 CFR §903.7(b)

☐ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c)

☐ **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d)

☐ **Homeownership Programs**. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k) and 24 CFR §903.12(b).

☐ **Safety and Crime Prevention (VAWA).** A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

☐ **Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i)

☐ **Significant Amendment/Modification**. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 **New Activities.** If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☐ **HOPE VI.** 1**)** A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6 **.** (Notice PIH 2011-47)

☐ **Mixed Finance Modernization or Development. 1)** A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

☐ **Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

☐ **Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

http://www.hud.gov/offices/pih/centers/sac/conversion.cfm**.** (24 CFR §903.7(j))

☐ **Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.

☐ **Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations and describe how project-basing would be consistent with the PHA Plan.

☐ **Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).

☐ **Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

B.3 **Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.4 **Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 **Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements

C.1 **Resident Advisory Board (RAB) comments**. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.
The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' … PHA Plans (including any plans incorporated therein) …. Strategies and actions must affirmatively further fair housing …." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless , the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 7.02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

CITY OF ARVADA

# REPORT TO HOUSING AUTHORITY	AGENDA ITEM VIII.3.

TO: THE HONORABLE CITY COUNCIL DATE: July 1, 2025

SUBJECT: The 2024-2025 Arvada Housing Authority Annual Report

Report in Brief

PRESENTER: Carrie Espinosa

The Arvada Housing Authority Annual Report summarizes the Authority's activities and achievements from July 1, 2024 to June 30, 2025. The Housing team will provide a brief overview of the Annual Report. If you have any recommendations for revisions to the report, please share them during the meeting.

The Arvada team recommends that the Board of Commissioners approve the Arvada Housing Authority 2024-2025 Annual Report.

Financial Impact

There is no financial impact associated with this agenda item.

Background

The Arvada Housing Authority receives grant funding from the U.S. Department of Housing and Urban Development (HUD) to provide rental assistance to very low and extremely low income households in Arvada. Each year, the Arvada Housing Authority prepares an annual report that summarizes the activities and achievements of the Arvada Housing Authority. Data in the report includes the number of households served, the amount of rental assistance paid, demographics, partnerships, affordable housing partnerships and future goals.

Discussion

The 2020 and 2024 Arvada Housing Needs Assessments identified the top housing needs in Arvada. One of the top needs was affordable housing options for households earning $35,000 or less per year. The Arvada Housing Authority's Housing Choice Voucher Program, partnerships with service providers and affordable housing developers target households at the extremely low income level, making the Housing Authority's programs and partnerships a vital resource for the community.

Public Contact

Posting of the City Council agenda.

Commission Recommendation

N/A

Strategic Alignment

The Arvada Housing Authority Administrative Plan supports the Housing goal identified in the City of Arvada Strategic Plan- Improve access to diverse, safe and affordable housing options and programs, providing residents with opportunities to obtain housing that meets their needs in all phases of life.

Alternative Courses of Action

N/A

Recommendation for Action

The Arvada team recommends that the City Council approve the 2024-2025 Arvada Housing Authority Annual Report.

Suggested Motion:

I move that the 2024-2025 Arvada Housing Authority Annual Report be (approved) (rejected).

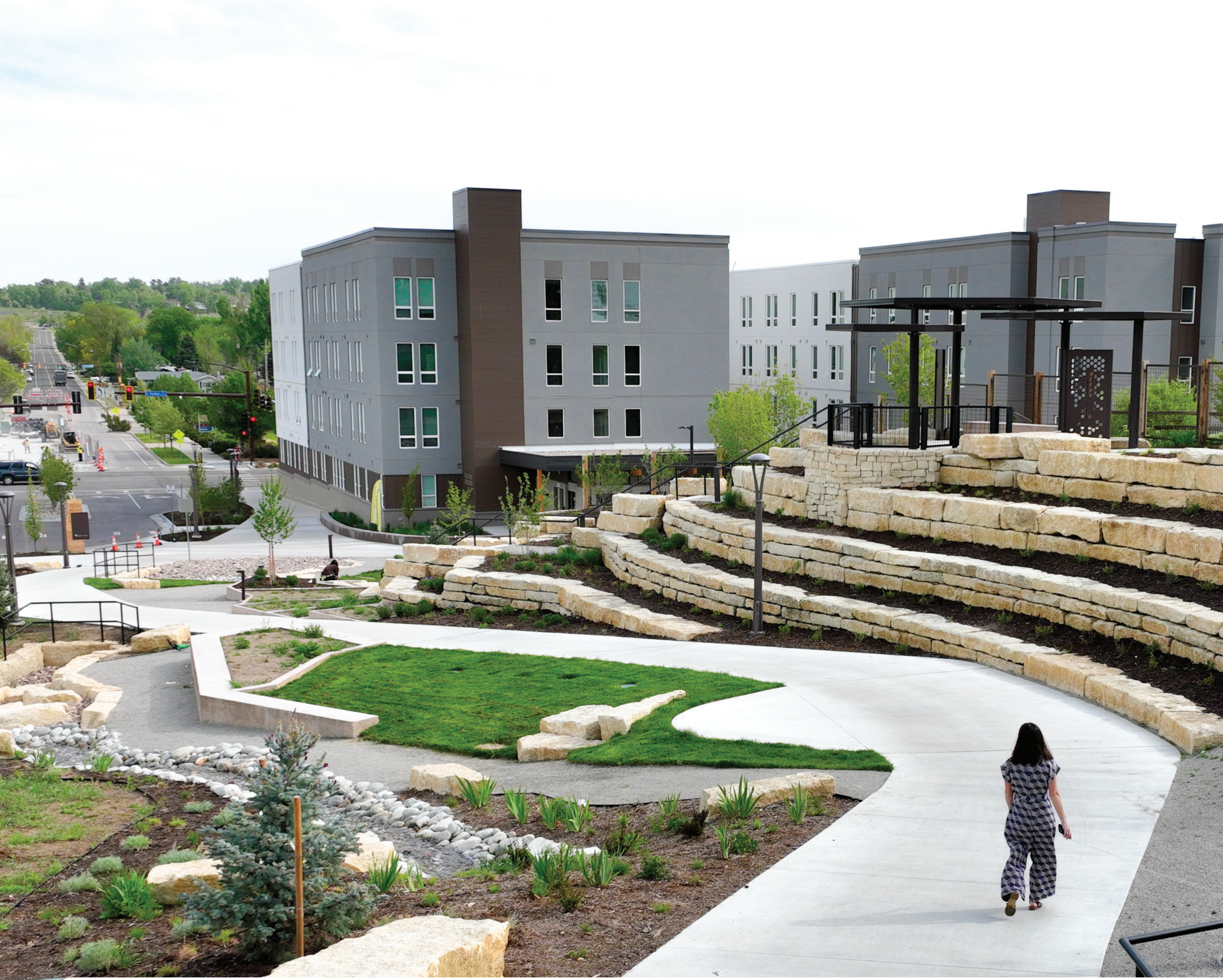
Prepared by:
Carrie Espinosa, Manager of Housing Preservation and Resources

Reviewed by:

Approved by:

Carrie Espinosa, Manager of Housing Preservation and Resources	6/9/2025
Jessica Garner, Director of Community and Economic Development	6/9/2025
Bryan Archer, Director of Finance	6/9/2025
Gail Walker, Legal Specialist-Contracts	6/10/2025
Erika Pierce, Litigation Paralegal	6/10/2025
Megan McCall, Assistant City Attorney II	6/11/2025
Rachel Morris, City Attorney	6/13/2025
Linda Haley, Deputy City Manager	6/16/2025
Don Wick, City Manager	6/17/2025

Enclosure, exhibits & attachments required to support the report



Arvada

Housing Authority

ANNUAL REPORT

7/1/2024 - 6/30/2025

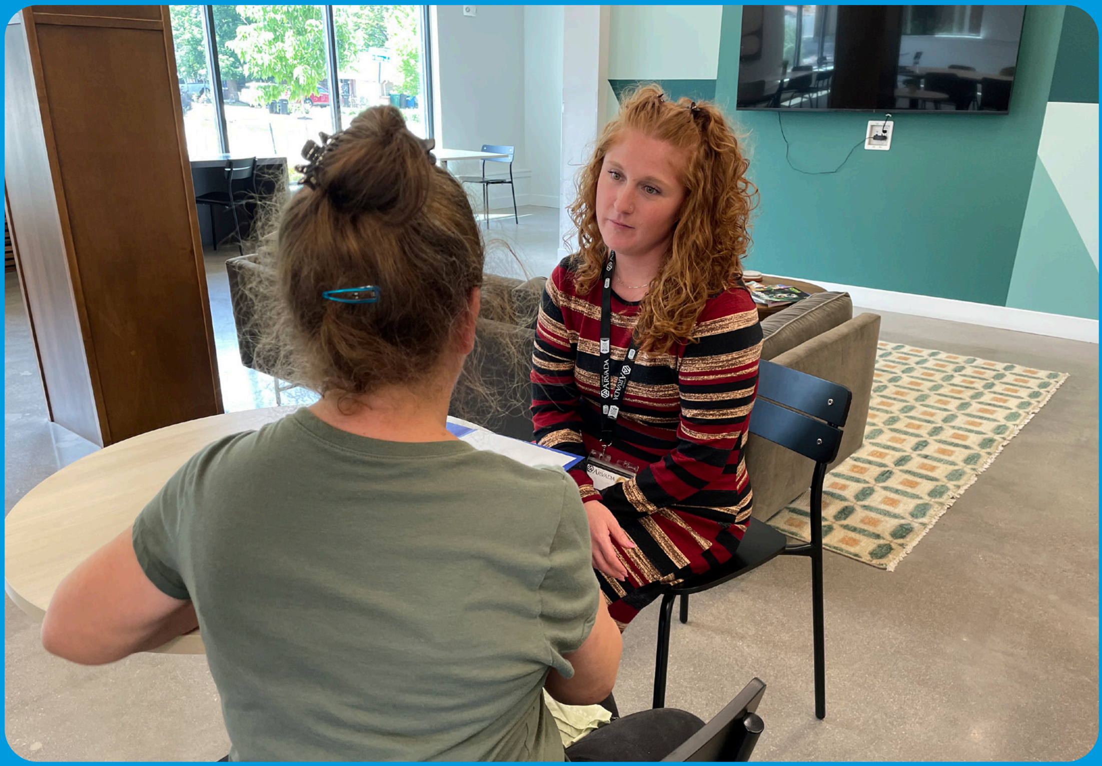
Mission

We are dedicated to delivering superior services to enhance the lives of everyone in our community.

The Arvada Housing Authority (AHA) supports the Housing Strategic Result identified in the City of Arvada Strategic Plan: **Improve access to diverse, safe, and affordable housing options and programs, providing residents with opportunities to obtain housing that meets their needs in all phases of life.**

To achieve this, we offer the following types of rental assistance to residents:

- **The Housing Choice Voucher (HCV) Program** helps low-income families, elderly persons, veterans and disabled individuals afford housing in the private market.
- **The Project-Based Voucher (PBV) Program** attaches rental assistance to specific housing units.
- **Mainstream vouchers** assist non-elderly persons with disabilities who are homeless or at risk of homelessness upon admission.



A City of Arvada Housing Navigator visits a resident.

Who we serve

57%
elderly persons

53%
persons with disabilities

$8,969,665
in rental assistance

$16,390
the average annual income of a household in the Housing Choice Voucher Program

537
households assisted in 2024 and 2025

27%
of families were homeless before entering the Housing Choice Voucher Program

$1,406
average per unit cost

73%
female head of household

27%
male head of household

67%
Non-Hispanic

33%
Hispanic

84%
White

12%
African American

4%
other

Celebrating one year of a successful Pr

A Project-Based Voucher (PBV) is a type of federal rental assistance where the voucher is tied to a specific rental unit in a designated property, rather than being linked to an individual resident. The voucher stays with the unit, so even if the current resident vacates, it can be used by a new eligible resident within the same unit. Some of the advantages of PBVs include improved access to supportive services for residents, securing units in areas where traditional vouchers might be difficult to use and encouraging the development or preservation of affordable housing by providing a secure revenue stream for property owners.

In March 2024, the Arvada Housing Authority housed its first ever PBV residents in seven units at Vance Street Flats, located at 5854 Vance Street.

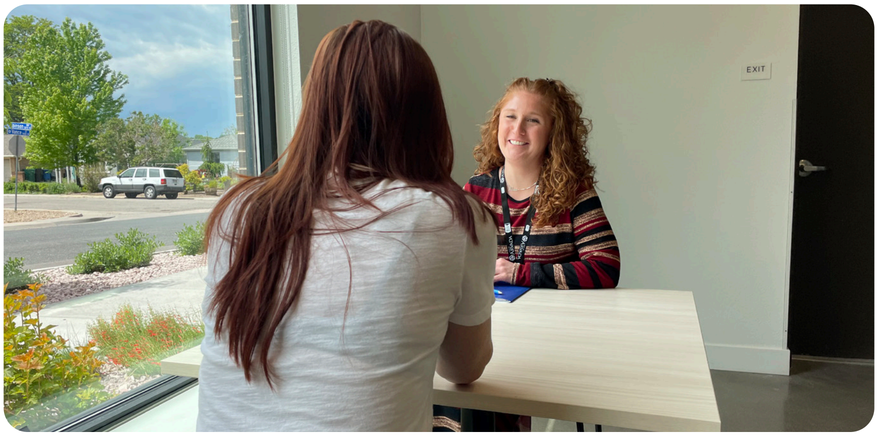
In October 2024, the Arvada Housing Authority housed an additional eight residents at the new Ralston Gardens affordable housing community at 5772 Garrison Street.

Here is what our residents have to say about working with our Housing Navigator:

"Gathering information and completing paperwork for Vance Street Flats was no simple task, for the arms of stress and uncertainty were trying to embrace me. Having Alexa for my Housing Navigator brought guidance, strength, assistance, respect, determination, non-belittling encouragement and hope."

"The Arvada Housing Authority and the Housing Navigators are amazing! They helped me get out of homelessness and into a safe, affordable home. They are supportive and caring professionals who are truly dedicated to helping others succeed. I don't know what my life would be like without their guidance, but I do know that they helped save it."

"I feel blessed to have met Alexa and have her as my life coach for the last two years. She has helped me grow and become more confident. Her continued care keeps me grounded and helps me problem solve in new ways. Vance Street Flats has been a safe and secure place for me to develop life skills. I am clean and healthy, and I have great neighbors. I am right where I should be. I'm so grateful!"



oject-Based Voucher program!

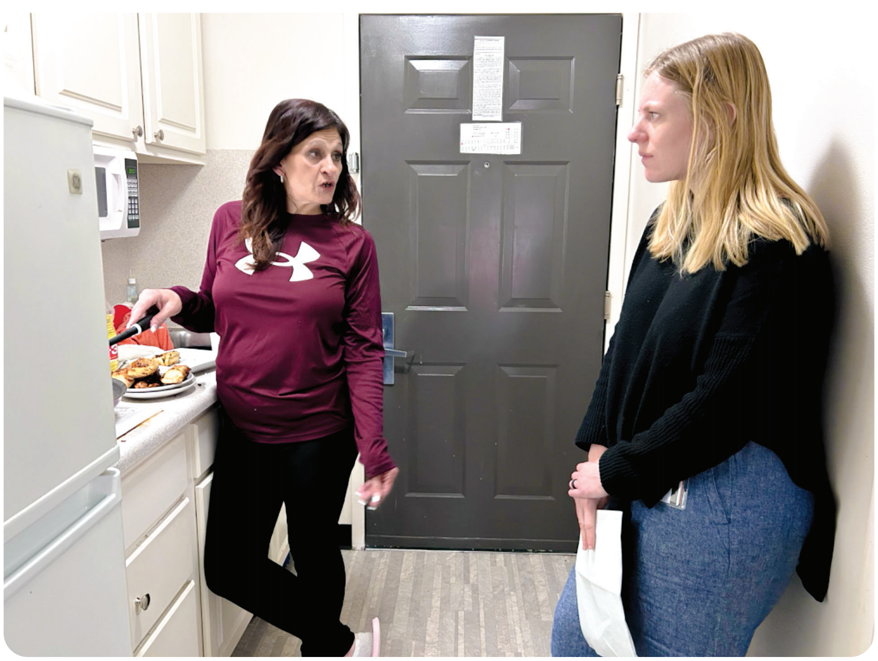
As part of the PBV program, the Arvada Housing Navigator is a staff member who offers supportive services to the PBV residents, which are instrumental in their success.

The Housing Navigator can assist with:

- Budgeting
- Establishing bank accounts
- Facilitating payment plans to resolve past debt and improve credit
- Completing job applications and arranging transportation to interviews
- Setting up utility services, such as electricity and internet
- Journaling, daily planning and weekly goal setting
- Mentorship and ongoing support

- **Connections to numerous other resources such as:**
  - Mental Health
  - Low-income Energy Assistance Program (LEAP)
  - Food Stamps
  - Medicaid/Medicare applications
  - Supplimental Security Income (SSI)/ Social Security Disability Insurance (SSDI) applications
  - Connection with food banks
  - Assistance setting up benefit portal accounts
  - Bus passes
  - Energy Outreach Colorado (EOC) applications

The Arvada Housing Authority also prioritizes people experiencing homelessness for the Project-Based units at Vance Street Flats and Ralston Gardens. The same prioritization will be offered at future developments at Legacy Senior Residences and Marshall Pointe Apartments.

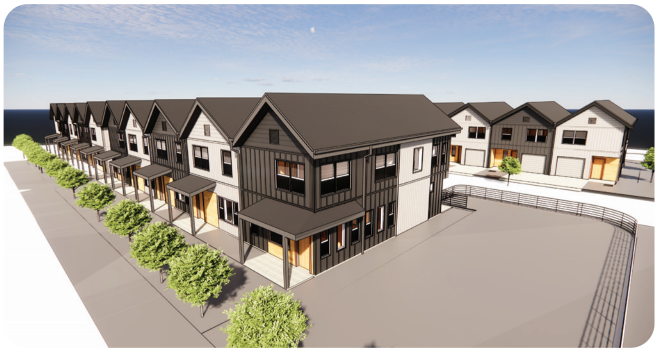


Affordable Housing Development Pipeline

The AHA continues ongoing efforts to encourage developing and preserving affordable housing in Arvada. The following projects are in the development pipeline:

Cornerstone Legacy Senior Residences

- W. 64th Avenue and Sheridan Boulevard
- Units: 72
- Eight Housing Choice Vouchers, $840,000 loan provided by AHA and Special Limited Partnership
- Opening date: July/August 2025



Habitat for Humanity Griffith Station Townhomes

- W. 52nd Avenue and Carr Street
- Units: 20 for-sale townhomes
- 1.2-acre parcel conveyed to Habitat for Humanity by AHA
- Opening date: To be determined

Marshall Street Landing

- W. 55th Avenue and Marshall Street
- Units: 85
- $200,000 grant provided by AHA
- Opening date: July 2025

Marshall Pointe Apartments

- W. 52nd Avenue and Marshall Street
- Units: 260
- Eight Housing Choice Vouchers and $850,000 loan provided by AHA and Special Limited Partnership
- Opening date: To be determined

Budget Outlook for 2025

The Arvada Housing Authority projects a budget shortfall in 2025. This shortfall is primarily due to two factors:

1. The formula used by the U.S. Department of Housing and Urban Development (HUD) involves an inflation factor dependent on an increase in the Fair Market Rents. The Fair Market Rents published in October 2024 did not increase from the prior year, meaning that HUD did not include an inflation factor into the 2025 budget.
2. Although the Fair Market Rents reflect stabilization in rents in Arvada, AHA continues to see an annual increase in per unit cost, which can primarily be attributed to rent increases.

Currently, AHA has a projected budget shortfall of **$925,000** by the end of the program year (Dec. 31, 2025). Staff are working closely with the HUD Shortfall Prevention Team and have implemented policies and practices to lower spending. HUD has made it clear that they have very limited funds to address HCV shortfalls in 2025, and housing authorities should not operate their programs under the assumption that such funds will be available. HUD has encouraged housing authorities to decrease the number of households served in anticipation of future funding cuts.

Based on recommendations from HUD representatives, AHA needs to prepare for a reduction of approximately **55** households to prepare for potential reductions in funding. Staff will continue to meet with HUD, monitor the budget and keep the Arvada Housing Authority Commissioners apprised.

Recommended Activities for 2025 and 2026

- Efficient operation of the Housing Choice Voucher Program
- Closely monitor federal budget
- Support the Arvada Housing Strategic Plan strategy implementation
- Explore new opportunities for funding and partnerships
- Adopt the mandates outlined in the Housing Opportunities Through Modernization Act of 2016 (HOTMA)
- Implement National Standards for the Physical Inspection of Real Estate (NSPIRE) on Oct. 1, 2025, as mandated by HUD

The need for more assistance remains

When the HCV waitlist opened for two days in January 2025, 3,118 applications were accepted. Due to a projected shortfall in funds for 2025, no vouchers have been issued from the wait list as of this date.

The Project Based Voucher (PBV) waitlist opened in December 2023. By the time it closed on Aug. 1, 2024, more than 900 applications had been accepted. As of this date, there are still 264 families on the list.

Arvada

Housing Authority

8101 Ralston Road

Arvada, CO 80002

720-898-7494