



DRAFT 2022 Annual Action Plan

Comment Period: December 13, 2021 – January 12, 2022

Submit all comments by January 12 to:

communitydevelopment@coloradosprings.gov

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800-659-3656 Relay Colorado (voice) or 800-659-2656 (TTY).

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Executive Summary

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

1. Introduction

The City of Colorado Springs receives funding on an annual basis allocated by Congress and administered through the US Department of Housing and Urban Development (HUD) to create strong, sustainable, inclusive communities and quality affordable homes for all.

The Annual Action Plan (AAP) provides a summary of the actions, activities, and the specific federal and non-federal resources that will be used during the program year to address the priority needs and specific goals identified by the Consolidated Plan. It is required by statute and helps ensure accountability and transparency for use of these taxpayer funds. This Annual Action Plan covers the third year of the 2020-2024 Consolidated Plan, and results are reported annually in the CAPER (Consolidated Annual Performance and Evaluation Report).

The City's Community Development Division (CDD) is the lead agency responsible for preparing the Annual Action Plan and administering these funds, which come through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) programs. The Annual Action Plan details how the City plans to invest its resources to meet its ongoing affordable housing, community development, and public service needs during the City program year, April 1 through March 31.

In 2022, the City plans to continue its work providing decent and affordable housing, suitable living environments, and vital public services to improve the lives of its citizens – especially low- to moderate-income households and special needs communities such as the elderly, people experiencing homelessness, and persons with a disability.

In 2021, the Division continued to respond to the evolving impacts of the COVID-19 pandemic, managing additional funding through the CARES Act of 2020, deploying Emergency Rental Assistance Program funds, and pivoting to address economic development needs of low-income communities. The Division will build on these efforts and collaborations in 2022, while adopting an allocation plan for additional relief funds through the American Rescue Plan Act, specifically HOME-ARP funds (the 2021 Annual Action Plan will be amended to include HOME-ARP funds, as per HUD instructions).

2. Summarize the objectives and outcomes identified in the Plan

Affordability continues to be the largest housing problem in Colorado Springs. Housing costs are continuing to grow faster than household incomes, with home prices up 24% over last year and rents spiking as well. A third of residents in El Paso County pay more than 30% of their income on housing, with 13% paying more than half. The Needs Assessment for the 2020-2024 Consolidated Plan, which informs the goals of this Annual Action Plan, examined household incomes, housing costs and availability, and housing conditions such as overcrowding, insecurity and homelessness. It found housing cost burden is a big issue for many families and households in the community, especially for low- and moderate-income households. Economic impacts of the pandemic as well as dramatic housing cost increases are exacerbating these issues for our most vulnerable residents.

The City of Colorado Springs developed a strategic plan for utilizing HUD funds based on the analysis of the data presented in the 2020-2024 Consolidated Plan as well as the community participation and stakeholder consultation process. Through these efforts, the City identified five (5) priority needs and associated goals to address those needs within the funding guidelines. The priority needs are:

1. Improved Public Infrastructure & Facilities
2. Increased Supply of Affordable Housing
3. Public Services & Quality of Life Improvements
4. Neighborhood Economic Development Opportunities
5. Homeless Housing & Supportive Services

The goals to address those needs are:

- 1A. Expand Public Infrastructure
- 1B. Improve Public Infrastructure Capacity
- 1C. Improve Access to Public Facilities
- 2A. Provide Owner Occupied Housing Rehab
- 2B. Increase Homeownership Opportunities
- 2C. Increase Affordable Rental Housing Options
- 3A. Provide Supportive Services for Special Needs
- 3B. Provide Vital Services for LMI Households
- 4A. Direct Assistance to For-Profit Businesses
- 5A. Provide Homelessness Prevention and Rapid Re-Housing Assistance
- 5B. Provide Assistance for Street Outreach and Homeless Shelters

To meet these goals, the City will partner with multiple public and private agencies to fund targeted activities described in this plan. Some examples include:

1. Offer competitive grants to eligible agencies to improve or expand essential public infrastructure.
2. Provide financial support and development incentives to create and preserve affordable housing, including expanding home ownership assistance.
3. Engage local nonprofit rehabilitation experts to make homes accessible for low income disabled and senior residents.
4. Work with local economic development nonprofits to provide direct assistance for local small businesses providing jobs in low-income communities, and to support the Community Investment Trust and Solid Rock Community Development Corporation to increase investment in the Southeast.
5. Offer competitive grants to fund local eligible nonprofit agencies to keep vulnerable residents housed or place those experiencing homelessness into stable housing. This will include investing in street outreach and the HMIS data system, and spending down the Emergency Rental Assistance Program funds.
6. Continue implementing strategies in the HomeCOS housing plan and meeting or exceeding Mayor Suthers' goal of creating 1,000 affordable and attainable housing units each year.

3. Evaluation of past performance

In 2021 the Community Development Division continued responding to the urgent needs brought about by the COVID-19 pandemic by working with community partners to coordinate resources, maintain needed programs and strategically allocate and monitor CARES Act funding to help our most vulnerable community members. In addition, the Division made significant progress toward achieving the outcomes for the second year of the 2020-2024 Consolidated Plan. 2021 Public Services funds were awarded in the summer for:

- Housing counseling
- Senior home share operations
- Case management for families at risk of homelessness
- Housing stability services for low-income veterans
- Emergency homeless shelter services for unaccompanied adults, families, and youth

Notable activities from CARES Act ESG and CDBG programs, Emergency Rental and Mortgage Assistance, and other programs include:

- Continued operating the Homeless Isolation Shelter at a new location, which is caring for about two dozen shelter guests at time with a COVID diagnosis or symptoms.
- Supported staffing at youth and adult shelters to manage COVID-safety measures.

- Managed and supported outreach for residents to apply for and receive Emergency Rental Assistance Program funds, leading to over \$26 million in funds going out to residents in the metro area in 2021.
- Advertised the new Mortgage Assistance Program.
- Funded housing crisis counselors, family shelter, street outreach with health and social workers, rapid re-housing services, and a new a Landlord Engagement program to incentivize landlords to accept assisted clients.
- Provided grants and training to microenterprises through a program that received national recognition for supporting economic development in low-income communities.
- Created a new development fee offset program to incentivize development of affordable housing.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Substantive public engagement is essential to effectively meet the needs of our residents and understand what people are experiencing and what our residents care about. To this end, the Division follows the City's Citizen Participation Plan (CPP), which provides for and encourages public participation and consultation. It emphasizes involvement by residents and the organizations and agencies that serve low/moderate income (LMI) persons in the planning and implementation of community development and housing programs. In response to the need for social distancing, isolating/quarantines, and other emergency public health measures, we amended our CPP in 2020 to make necessary updates regarding noticing and digital meeting venues.

In order to create this plan, we held four public hearings via digital platform (Microsoft Teams), which were noticed through our paper of record and through several digital outlets including social media, City website, and direct email. In order to seek comment on the plan draft, we noticed the comment period and upcoming public hearings using the same methods above. All site contents on the City's website are available in 104 languages. Email notices were sent in English and Spanish. Our Microsoft Teams Live events in October featured live closed captioning in English for the deaf and hard of hearing, and in Spanish, German, Korean, Chinese and Vietnamese. The January public hearing will feature those as well.

In order to hear from peer agencies and organizations, we held a number of small digital meetings to discuss effects of the pandemic on operations, client and organizational needs, outreach efforts, and planned projects. We seek mutually supportive ties with partner organizations when goals and target audiences intersect or complement one another.

Citizen Participation Outreach

See AP-15 Citizen Participation for more details about the citizen participation process and engagement efforts undertaken by the Community Development Division.

5. Summary of public comments

Comments shared during the four public meetings in October 2021 included:

- support for avoiding concentration of low-income housing in any neighborhood,
- the need to find lower rents for seniors, interest in the types of businesses being supported by economic development funds,
- interest in broadening the scope of economic development partners,
- gratitude for the accessibility of holding the events virtually,
- accessibility of data on homelessness,
- support for emphasis on equity,
- need for more housing navigation and
- emphasis on the fair market rent restrictions creating barriers with the fast pace of rent increases,
- need for landlord incentives and help with application fees.

Feedback from a survey of event attendees will be added here when it becomes available.

Documentation of citizen participation will be attached as an appendix to the final document.

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

No comments or views were rejected or not accepted.

7. Summary

N/A

PR-05 Lead & Responsible Agencies – 91.200(b)

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	COLORADO SPRINGS	Community Development Division (CDD)
HOME Administrator	COLORADO SPRINGS	Community Development Division (CDD)
ESG Administrator	COLORADO SPRINGS	Community Development Division (CDD)

Table 1 – Responsible Agencies

Narrative (optional)

The City of Colorado Springs, through the Community Development Division (CDD), is the lead agency responsible for preparing the Annual Action Plan and for administration of the CDBG, HOME and ESG programs.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Colorado Springs Community Development Division conducted several meetings with peer agencies, service providers, city departments, and neighborhood leaders to maximize input from, and coordination with, a large cross-section of stakeholders. This outreach effort was largely virtual to help prevent the spread of COVID-19.

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

In 2021, the Division continued the increased level of ongoing coordination between the City and the region's public and private health and housing providers to help manage the evolving impacts of the COVID-19 pandemic.

1. Emergency response – the Division continued working with public health, emergency response agencies and service providers to operate an isolation shelter for individuals experiencing homelessness who tested positive for COVID-19 or presented at a local emergency room or shelter with symptoms. The shelter provides access to limited care, meals, showers and a laundry. This temporary shelter and related services moved location in 2021 and will continue operating into 2022.
2. Local housing authorities – The Colorado Springs Housing Authority (CSHA) is a member of the Pikes Peak Continuum of Care (PPCoC) governing board. CDD’s HUD program manager meets with CHSA’s Executive Director and key staff regularly to discuss joint priorities and programs. In November 2020, CDD and CSHA consulted on the planned use of HUD funds in the coming program year. Shared priorities and desired outcomes discussed during the consultation are described in AP-60 Public Housing. The El Paso County Housing Authority (EPCHA) is a 5-member governing body appointed by the El Paso County Board of County Commissioners. EPCHA is best described as a finance agency, not a traditional PHA. CDD’s HUD Program Manager is a member of the EPCHA governing body which meets monthly. EPCHA administers a housing trust fund, oversees issues of private activity bonds (PAB), and provides modest grants for rural human service agencies.
3. Private non-profit housing providers – The City has two ex-officio members of the Pikes Peak Continuum of Care (PPCoC) governing board – the homelessness prevention and response coordinator and the Community Development Division manager. The board includes private, governmental, mental health, and human service agencies, and meets monthly. Thanks to the data gathered and shared by this

entity, the City prioritizes funding housing assistance programs that pair direct assistance with wraparound services. We recognize the value of housing as a health indicator and of health services as a key to maintain housing stability. As COVID-19 impacts evolve to include staffing shortages and a tightening rental market, the Division has increased coordination with service providers to anticipate and address these new challenges.

4. Community Development staff began conducting outreach to service providers to build the HOME-ARP allocation plan that will be submitted in Q1 2022.

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

The City's two staff who are ex officio members of the PPCoC governing board act as liaisons for City interests and Community Development collaborative efforts. Homeless Management Information System (HMIS) data helps the City and CoC determine effectiveness of initiatives and strategies and identify gaps in service by population. Community Development takes this information into account when deciding priority populations, facility needs, and project management procedures.

The PPCoC also acts as a convener of regional service providers to help inform the policies, procedures, and funding priorities of public funders such as the Community Development Division.

In 2021, the PPCoC administrator, Community Health Partnership (CHP), was awarded private grant funding to address barriers to obtaining housing. Division staff assisted CHP in reviewing policies and procedures for a new flexible housing support program service providers can use to help level the playing field for their clients in a competitive market. This program will roll out and be operational in PY 2022.

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

Community Development manages federal ESG funds, while the CoC is the collaborative applicant for federal CoC funds and manages state ESG funds. Both entities award these funds competitively to service providers in the region. CDD collaborates with the CoC administrative staff to determine the awarding of funding.

The strategy for spending ESG funding is generally dictated by the program parameters and the fact that ESG covers activities other sources do not. The City typically makes its funding available for all five components of the ESG program. It directs its full 60% cap of entitlement ESG funds for shelter operations and street outreach, to help local low-barrier shelters because those activities are not eligible for CoC funds. The remaining 40% is divided between rapid rehousing, homelessness prevention, and HMIS.

Rapid rehousing is valued by the members of the PPCoC, as it is a critical tool in diversion and connecting people to stable, permanent housing. Subrecipient control of these funds make it an even more valuable tool to use when Emergency Rental Assistance Program (ERAP) funds can often not be available quickly enough to resolve a housing emergency. Homelessness prevention is a valuable piece of ESG funding as it is not currently funded by CoC grant dollars. However, it remains the hardest program for service providers to run because of the high administrative barriers that make it hard to serve those who are truly at risk of homelessness. Lastly, support for HMIS remains a regional priority because of the value the community (and HUD) place on data quality and outcome reporting.

CDD took part in reviewing and providing feedback on the new CoC Strategic Plan and supports a shared model for collaboration and data informed decisions that will be carried forward into 2022. There remain gaps in permanent supportive housing and services for families with children and households scoring extremely high on the vulnerability index (usually indicating substantial medical, mental health, or other supportive service needs). Family shelter, rapid rehousing, and permanent supportive housing continue to be high-priority projects for 2022, with support for housing navigation a critical need in the tightening housing market.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	El Paso County Economic Development
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	El Paso County Economic Development manages county CDBG funds. CDD staff met to learn funding priorities, discuss funding to shared subrecipients, COVID impacts and CV funding, data tools, and sharing fair housing resources.
2	Agency/Group/Organization	Colorado Springs Housing Authority
	Agency/Group/Organization Type	PHA Services - Housing Other government - Local
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homelessness Strategy

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>CSHA is the local public housing authority (PHA). CDD HUD Program Manager meets regularly with the CSHA Executive Director to discuss public housing needs, housing affordability in the region, and alignment of upcoming projects and activities across CDD and CSHA programs. Shared priorities and desired outcomes include housing extremely low-income households, increasing the supply of affordable and accessible rental housing, and effectively leveraging HUD funds with other finance tools such as the Low-Income Housing Tax Credit (LIHTC) program. CDD staff held additional meetings with CHSA staff to review an update on CSHA's Section 504 Program and to discuss challenges finding rental units for voucher holders. CDD plans to support an additional housing navigator for clients with housing vouchers, who are having a harder time finding units available due to increasing rents in a tightening housing market. CDD will continue to support CSHA in leveraging tax-credit financing as well as HOME and CDBG funds from the City of Colorado Springs, The Section 504 Program, encouraging CSHA resident participation, and COVID-related needs.</p>
3	<p>Agency/Group/Organization</p>	<p>City of Colorado Springs Homelessness Prevention and Response</p>
	<p>Agency/Group/Organization Type</p>	<p>Other government - Local</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy</p>

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Reviewed progress of Homelessness Initiative and plans for 2022, which include continuing to mitigate COVID among individuals experiencing homelessness by helping manage the Homeless Isolation Center, funded through CDD, maintain and build on homeless outreach programs, and improve data-driven community education on homelessness between the CDD, homelessness prevention, and the CoC.
4	Agency/Group/Organization	Colorado Legal Services, The Justice Center
	Agency/Group/Organization Type	Regional organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Other: Fair Housing, Housing stability
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Discussed CDBG funding priorities, eviction prevention resources, current eviction trends and projections, and legal agency needs.
5	Agency/Group/Organization	Council of Neighbors and Organizations
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CDD staff met with new leadership of the Council of Neighbors and Organizations to discuss their new mission to serve neighborhoods. There is a blueprint to create engaged residents and leaders in all areas of the city, especially under-resourced neighborhoods.
6	Agency/Group/Organization	Pikes Peak Continuum of Care
	Agency/Group/Organization Type	Services-homeless Regional organization

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CDD and the PPCoC administrators worked closely on using HMIS data to evaluate outcomes of ESG-funded activities.
7	Agency/Group/Organization	Office of Innovation and Sustainability, City of Colorado Springs
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Other
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CDD staff met with staff in the Office of Innovation to learn how the City' works with broadband and internet access providers, how they work to bridge the digital divide and to discuss the possibility of incentives for bundling internet and cable for affordable housing developments as part of a new fee offset program. The Office of Innovation considers affordability, accessibility and digital literacy for residents, and manages the cable franchise services agreements with cable and broadband providers. Affordability and accessibility is sought through increased private sector competition. The City is looking at creating a digital literacy program inspired by some in other cities.
8	Agency/Group/Organization	Colorado Springs City Council Members
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Other
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CDD staff met with members of Council during the plan drafting in order to capture constituent concerns and familiarize our local leaders with the public process. We shared feedback collected so far and heard Council members' thoughts and issues brought up in their districts. Issues and suggestions raised: need for collaboration with landlords to accept more vulnerable tenants, resources needed to prevent displacement of low-income seniors, request to look into partnership with Amazon on housing fund contributions.
9	Agency/Group/Organization	El Paso County
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Other
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	County staff gave a presentation to CDD on County's 2021 Assessment of Fair Housing update. City and County staff discussed urban and rural Fair Housing trends and discussed ways to share data and provide aligned programming.
10	Agency/Group/Organization	Coalition for Homelessness Advocates & Providers (CHAP) and Pikes Peak Continuum of Care (PPCoC)
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CDD staff updated a group of local homeless service providers on ERAP funding and progress. Staff shared how the City is leveraging other funds like CDBG and ESG to support gaps in assistance. CHAP attendees shared concerns and questions about ERAP policy and local landlords' participation.

11	Agency/Group/Organization	Housing Domain of Age Friendly City collaboration (Innovations in Aging)
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CDD staff presented ideas for addressing the growing problem of senior housing displacement resulting from rapidly increasing rents.
12	Agency/Group/Organization	Growing Tree Care
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Veterans
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CDD staff consulted by email and phone call. Anticipated outcomes are the ability to submit a competitive application for transportation, and housing navigation services to people at risk of or experiencing homelessness.
13	Agency/Group/Organization	Finding Our Voices
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This group was consulted by email and phone call. Anticipated outcomes are the ability to submit a competitive application for behavioral health and support services to DV and sexual assault survivors. CDD provided application information and eligibility guidelines.

14	Agency/Group/Organization	Servicios de la Raza
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CDD staff met with Denver-based Servicios de la Raza to discuss the agency's recent work in Colorado Springs to improve health and economic outcomes for Latino families. Colorado Springs Latino and BIPOC households have been disproportionately affected by the COVID-19 pandemic, in addition to experiencing worse outcomes in the realms of health, housing, and income prior to the pandemic. This conversation explored who is addressing this and how.
15	Agency/Group/Organization	The Justice Center, PPLD, Brothers Redevelopment, Colorado Legal Services
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Other
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CDD staff met with partner agencies who collaborate on eviction prevention efforts through tenant legal education to discuss continuing need and impact of the collaboration, and to plan for 2022 education programming.

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

CDD staff did not engage with any Community Development Financial Institutions in preparation for the Annual Action Plan. While there are no Colorado Springs-based or El Paso County-based CDFIs, there are CDFIs elsewhere in the state and in other Mountain West states which staff intends to consult on specific programs to be developed under the CDBG Economic Development activity throughout the program year. CDD

staff also did not consult with major private employers directly, but CDD listens to and considers their feedback indirectly through close collaborations with the economic development division.

The City’s Office of Emergency Management is not on the consultation list, but this is not due to lack of communication. CDD worked extensively with this office to set up the Homeless Isolation Shelter for people experiencing homelessness with COVID symptoms and/or a COVID diagnosis. The City’s Grants Manager, who works closely with the Community Development Division staff on financial aspects of grant administration, shares OEM priorities when opportunities for collaboration arise.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2021 PPCoC 3-Year Strategic Plan	Community Health Partnership	Outlines regional strategy to prevent and end homelessness.
PlanCOS	City of Colorado Springs	This strategic plan and the City Strategic Plan are designed to complement each other and contain the same goals and strategies, specifically around arresting decline in targeted neighborhoods and supporting affordable housing with access to transit.
HomeCOS: Colorado Springs 2020 Affordable Housing	City of Colorado Springs	Ongoing planning effort targets strategies to ease housing development for the low- and very low-income groups
Special Evictions Task Force Final Report	Special Evictions Task Force	Prevent eviction, maintain housing stability, improve health outcomes for all who have experienced a loss of income.
2019 Homelessness Initiative	City of Colorado Springs	The Initiative goals were developed by City homelessness prevention and response coordinator and vetted by public. Outreach expansion goal aligns with CDD funding eligibility.
Mill Street Neighborhood Plan	City of Colorado Springs	2019 plan to strengthen historic downtown neighborhood by increasing economic, cultural, and physical resilience. CDBG and HOME-friendly strategies to prevent displacement and improve neighborhood conditions.
2020 CAPER and 2021 Annual Plan	City of Colorado Springs	These federal documents were considered in order to assess progress, long-term strategic planning, and future goals in light of past efforts

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Affordable and Accessible Housing Needs & Barriers	Independence Center	Identified seven needs and four barriers that were recurring themes for residents with disabilities. See discussion in NA-45 Non-Homeless Special Needs Assessment for the list of needs and barriers.
Colorado Springs School District Facilities Master Plan	Colorado Springs School District 11	This document identifies school campuses in the city in need of major repairs. The Division is using this document and guidance from D11 leaders as a focal point to initiate neighborhood-scale improvements in LMI areas.
Southeast Strong (in process) + Health Equity Assessment	City of Colorado Springs	This neighborhood plan is currently in the works under the leadership of the Comprehensive Planning Division. It covers southeast Colorado Springs and identifies key infrastructure and community development recommendations that Community Development can support in implementation.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

During this extraordinary year, all consultations were conducted via virtual meeting and framed in the context of the effects the pandemic will have on organizational budgets and programming for the coming year.

AP-12 Participation – 91.105, 91.200(c)

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

The Citizen Participation Plan (CPP) provides for and encourages public participation and consultation, emphasizing involvement by residents and the organizations and agencies that serve low and moderate income (LMI) persons in the planning and implementation of community development and housing programs. The CPP establishes the policies and procedures by which citizens of the City of Colorado Springs, public agencies, and other interested parties can actively participate in the development of the Consolidated Plan, Annual Action Plan (AAP), Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER).

We amended our CPP in 2020 as a response to the need for social distancing, isolating/quarantines, and other emergency public health measures, as well as to make necessary updates regarding noticing and digital meeting venues. Staff does check non-English language demographic trends annually to ensure accuracy of the CPP. The CPP is available on the CDD website at www.coloradosprings.gov/community-development and at the Community Development Division office located at 30 S. Nevada Avenue, Suite 702, 80903.

Citizen Participation Outreach

The Community Development Division (CDD) conducted four virtual public hearings to obtain feedback and solicit input into the needs of the community and this AAP. The meetings provided an introduction and explanation of the 2022 AAP purpose and the process and schedule for its completion. The presentations provided an opportunity for questions and comments, and they were recorded and made available on the Division's website. Public notice was published in the paper of record The Gazette October 1, 2021 for meetings held October 19, 20, 21 and 23. Meeting notices were sent out in English and Spanish to 470+ community partners and residents through Community Development's email list and shared on the City's website. The virtual meeting platform provided the option for participants to view captions in several languages, and the meeting videos were posted to the city's website and shared via email. Citizens were also invited to send in comments by email via the website and by phone.

The draft 2022 Annual Action Plan is being made available for public review and comment from December 13, 2021 to January 12, 2022 on the City's website at <https://coloradosprings.gov/community-development> and copies will be available at the following locations Monday through Friday during normal business hours: Community Development Division Office (Suite 701) and Office of the City Clerk (Suite 101), 30 S. Nevada Ave.; City Hall, 107 N. Nevada Ave.; Penrose Library, 20 N. Cascade; 21st Century Library, 1175 Chapel Hills Dr.; Hillside Community Center, 925 S. Institute St.; Westside Community Center, 1628 W. Bijou St.; and Meadows Park Community Center, 1943 S. El Paso Ave.

Notice of the availability of the draft plan and the opportunity to comment on it was advertised in the *Gazette on December 17, 2021*, by email and on the City's website.

Any individual, group, or agency may submit written comments on the draft 2022 Annual Action Plan to the City of Colorado Springs, Community Development Division, or contact (719) 385-5912 or CommunityDevelopment@coloradosprings.gov. Comments should specify which notice they are addressing. All comments received on or before January 12, 2022 will be considered by the City of Colorado Springs Community Development Division.

The following table summarizes comments received during and after public notice of the first public hearings. Comments received during the 30-day comment period and second public hearing will be added when those are complete.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
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1	Public Hearing	Non-targeted/broad community	<p>The Community Development Division held four virtual hearings on Tuesday 10/19, 2:30-3:30 p.m., Wednesday 10/20, 9-10 a.m., Thursday 10/21, 6-7 p.m., and Saturday 10/23, 10-11 a.m. accessible online to inform the public about the community development efforts in the plan and gather input on the plan. The meetings were recorded and the videos and slides are posted on the Division website. A</p>	<p>All members of the public were welcome. Questions and answers in the meeting chat box is included in the appendix. Attendees expressed need for greater funding for housing navigation, a flex fund (like we have for vets) to incentivize landlords to participate in accepting vouchers or reducing their rents to Fair Market Rent, concern over lack of</p>	<p>All comments from the public were welcome. Personally identifying information was removed</p>	<p>https://coloradosprings.gov/project/community-development-2022-annual-action-plan</p>
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			follow up survey was sent to participants and posted with the videos online.	affordable housing for seniors and interest in making housing units green/energy efficient.		

Table 4 – Citizen Participation Outreach

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Expected Resources

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

Introduction

Federal resources: The City of Colorado Springs receives funding through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) programs. At the time of publication of this draft 2022 Annual Action Plan for public comment, the City of Colorado Springs has not been notified by HUD of the precise amount of funding to be allocated to the City for the 2022 program year. The Division budgeted for a 10% increase in all three program allocations. The baseline funding amounts identified throughout this plan were estimates based on the City's 2021 funding allocations for each entitlement program. The Division's contingency plan is to decrease or increase the program budgets on a pro rata basis.

The Division anticipates Program Income (PI): \$200,000 from CDBG projects, \$500,000 from HOME projects.

Please note: CARES Act (CDBG-CV and ESG-CV) funding is tracked through our 2020 Annual Action Plan per HUD guidance and do not appear in this plan. Also per HUD guidance, HOME funds through the American Rescue Plan Act will be tracked through our 2021 Annual Action Plan. Please contact staff at communitydevelopment@coloradosprings.gov with any questions about the status of projects funded by these special funds.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3 of the ConPlan				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$3,536,276.70	\$200,000	0	\$3,736,276.70	\$7,472,553.44	Remainder of ConPlan is for program years 2023 and 2024. Prior year PI will go toward all eligible CDBG projects.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$1,742,730	\$500,000	0	\$2,242,730.00	\$4,485,460	Remainder of ConPlan is for program years 2023 and 2024.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3 of the ConPlan				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$288,897.40	0	0	\$288,897.40	\$577,794.80	Remainder of ConPlan is for program years 2023 and 2024.

Table 5 - Expected Resources – Priority Table

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

The City will use federal block grant funding, program income, City general funds, private activity bonds, and other incentive programs to address the objectives identified in this Plan. High-impact projects with the potential for public-private partnerships will be prioritized in order to leverage additional resources, such as state and federal tax credits for local development.

All grant applicants across all programs who use our new platform, Neighborly, must show the full project breakdown, including those costs not included in the grant request. Nonprofit housing and service providers rely on many sources of revenue for their operations. Most projects are made possible with some mix of federal grants, other public grants, private donations, and regular operating funds.

The City's Private Activity Bond capacity is set aside for affordable housing development each year – all revenue generated from issuer fees will be cycled back into the community by helping affordable housing developers with pre-development costs. For more information on how this tool works, visit <https://coloradosprings.gov/page/economic-development-private-activity-bonds-pabs>.

Colorado Springs complies with federal matching requirements for both HOME and ESG funds. HOME match is satisfied on an annual basis, while ESG match is required at the time of each individual award. Colorado Springs currently carries over a balance of \$2,852,667.23 as HOME match credit from previous years to apply towards PY2022 HOME match liability. Please note that in 2020, the Division elected to use the HOME match waiver. Each HOME dollar we spend is matched 25% for projects within the program year, including new construction of multifamily projects, acquisition and rehab projects, and homeownership programs.

ESG funds are matched by subrecipient funds. The Division monitors match expenditures throughout the life of the project and will withhold final reimbursements until the full match has been spent and documented. The Division will award projects with the assistance of the Pikes Peak CoC administrators to ensure ESG funds are leveraged most effectively with funds the CoC receives from HUD.

Low-Income Housing Tax Credits (LIHTC) have proven to be a highly effective method of increasing the supply of affordable housing. The City's strategy for coordinating LIHTC development into its affordable housing supply for low and moderate-income families is to provide technical assistance on an as-needed basis through the Community Development Division. The requirements for HOME financing mirror many of the Colorado Housing Finance Authority's requirements, creating a natural additional source of support for successful LIHTC applicants with projects in Colorado Springs.

Lastly, the Division has entered into an agreement with Colorado Springs Utilities (CSU) to create a fee offset program to incentivize affordable housing development using CSU funds and potentially state grant funds.

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

The majority of publicly owned land within the jurisdiction is dedicated to specific purposes such as parks, stormwater facilities, transportation rights-of-way, and other municipal needs. City departments overseeing those lands are made aware of and invited to apply for these funds to address accessibility and availability for residents of low-income neighborhoods.

Discussion

N/A

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1A. Expand Public Infrastructure	2020	2024	Non-Housing Community Development	Citywide	Expand/Improve Public Infrastructure & Facilities	CDBG: \$395,726.20	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
2	1B. Improve Public Infrastructure Capacity	2020	2024	Non-Housing Community Development	Citywide	Expand/Improve Public Infrastructure & Facilities	CDBG: \$395,726.20	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
3	1C. Improve Access to Public Facilities	2020	2024	Non-Housing Community Development	Citywide	Expand/Improve Public Infrastructure & Facilities	CDBG: \$395,726.20	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
4	2A. Provide for Owner Occupied Housing Rehab	2020	2024	Affordable Housing	Citywide	Preserve & Develop Affordable Housing	CDBG: \$838,733.32	Homeowner Housing Rehabilitated: 70 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	2B. Increase Homeownership Opportunities	2020	2024	Affordable Housing	Citywide	Preserve & Develop Affordable Housing	HOME: \$784,228.50	Homeowner Housing Added: 5 Household Housing Unit Direct Financial Assistance to Homebuyers: 10 Households Assisted
6	2C. Increase Affordable Rental Housing Options	2020	2024	Affordable Housing	Citywide	Preserve & Develop Affordable Housing	CDBG: \$500,000 HOME: \$958,501.50	Rental units constructed: 593 Household Housing Unit Rental units rehabilitated: 105 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 20 Households Assisted
7	3A. Provide Supportive Services for Special Needs	2020	2024	Homeless Non-Homeless Special Needs	Citywide	Public Services & Quality of Life Improvements	CDBG: \$366,257.23	Public service activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
8	3B. Provide Vital Services for LMI Households	2020	2024	Non-Housing Community Development	Citywide	Public Services & Quality of Life Improvements	CDBG: \$366,257.23	Public service activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
9	4A. Direct Assistance to For-Profit Businesses	2020	2024	Non-Housing Community Development	Citywide	Economic Development Opportunities	CDBG: \$277,850.31	Businesses assisted: 10 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	5A. Provide Homeless Rapid Re-Housing Assistance	2020	2024	Homeless	Citywide	Homeless Housing & Supportive Services	ESG: \$50,557.05	Tenant-based rental assistance / Rapid Rehousing: 40 Households Assisted Homelessness Prevention: 20 Persons Assisted
11	5B. Provide Assistance to Homeless Shelters	2020	2024	Homeless	Citywide	Homeless Housing & Supportive Services	ESG: \$238,340.36	Homeless Person Overnight Shelter: 3500 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	1A. Expand Public Infrastructure
	Goal Description	The City will expand public infrastructure capacity in low-to-moderate income neighborhoods throughout the City. We will accomplish this by inviting our city departments and local non-profits to bring forward projects that align with our priorities of public health and neighborhood stability. This year we are committing to health equity in the built environment and supporting School District 11 in neighborhood improvements near high-priority campuses in LMI areas. We changed our housing-related infrastructure goal to zero households because we do not anticipate receiving any infrastructure requests supporting affordable housing projects.

2	Goal Name	1B. Improve Public Infrastructure Capacity
	Goal Description	The City will allocate funding to improve existing infrastructure capacity by making needed repairs to existing infrastructure. We will accomplish this by inviting our city departments and local non-profits to bring forward projects that align with our priorities of public health and neighborhood stability. This year we are committing to health equity in the built environment and supporting School District 11 in neighborhood improvements near high-priority campuses in LMI areas. We changed our housing-related infrastructure goal to zero households because we do not anticipate receiving any infrastructure requests supporting affordable housing projects.
3	Goal Name	1C. Improve Access to Public Facilities
	Goal Description	The City will allocate funding to improve access to public facilities including but not limited to community centers, parks, libraries, as well as public facilities owned by partner non-profit organizations, such as shelters and medical facilities.
4	Goal Name	2A. Provide for Owner Occupied Housing Rehab
	Goal Description	The City will allocate funding to provide for much needed repairs to the City's aging housing stock. This shall include but is not limited to owner-occupied housing rehabilitation to address emergency repairs, weatherization, or accessibility improvements.
5	Goal Name	2B. Increase Homeownership Opportunities
	Goal Description	The City will allocate funding for down payment assistance via two different housing organizations serving first time homebuyers to increase affordable housing opportunities for low- to moderate-income homebuyers.
6	Goal Name	2C. Increase Affordable Rental Housing Options
	Goal Description	The City will allocate funding to provide for acquisition, rehabilitation or new construction of affordable housing units. Additionally, the City will allocate funding for rental assistance for low-income and special needs populations, such as people exiting homeless. The new 400 units will come in four complexes in different parts of the city. Among these include a 40-unit complex of 2- and 3-bedroom units serving families and a 54-unit complex serving seniors. These funds will also rehabilitate an 85-unit apartment building and make essential safety, sustainability and accessibility improvements. These funds will also continue to support the Colorado Springs Housing Authority in rehousing 15 homeless families. For more details on housing activities, see AP-38.

7	Goal Name	3A. Provide Supportive Services for Special Needs
	Goal Description	The City will allocate funding for supportive services directed towards special needs population, specifically for seniors and persons or families experiencing homelessness, through its annual competitive application process in spring 2021. We anticipate awarding funds to organizations to carry out housing-related services for many special needs households in 2021, such as housing counseling and subsistence payments for rent or mortgage. However, we listed '0' households under the "Low/Moderate Income Housing Benefit" indicator because these beneficiaries will qualify under LMC standards.
8	Goal Name	3B. Provide Vital Services for LMI Households
	Goal Description	The City will provide funding through a competitive application process for services and programs that primarily benefit low-income individuals or families. Funding priorities will remain closely tied to housing and family stability, and services that help households affected by the pandemic with essential needs. We estimate a minimum of 2,500 LMI beneficiaries of these 2021 funds. We also anticipate awarding funds to organizations to carry out housing-related services can help many LMI households in 2021 through services such as housing counseling and subsistence payments for rent or mortgage. However, we listed '0' households under the "Low/Moderate Income Housing Benefit" indicator because these beneficiaries will qualify under LMC standards.
9	Goal Name	4A. Direct Assistance to For-Profit Businesses
	Goal Description	After a successful pilot program, the Division will continue to work with a local partner to provide direct financial assistance for-profit businesses, specifically microenterprises, in efforts to fill gaps in need after pandemic aid programs have expired or never reached certain communities. These efforts will be concentrated in low-income neighborhoods or areas of low economic opportunity. The Commercial Façade and Frontage Improvement Grant (CFFIG) program will be on pause this year as small businesses do not have the capacity or market demand for exterior improvements. Microenterprise support to keep LMI and LMI-serving businesses sustainable will be the focus.

10	Goal Name	5A. Provide Homeless Rapid Re-Housing Assistance
	Goal Description	The City will provide funding for homelessness prevention and rapid re-housing programs in an effort to minimize the time individuals or families experience homelessness as well as to reduce the number of persons experiencing homelessness in Colorado Springs. We anticipate double the households assisted with the second round of ESG-CV funds focusing on rapid rehousing. Subrecipients of the ESG-CV round 2 homelessness prevention funds will also continue to help many families stay housed in PY 2022.
11	Goal Name	5B. Provide Assistance to Homeless Shelters
	Goal Description	The City will provide funding to support homeless shelter operations and facility improvements as needed. The Division will consider the percentage of ESG funds going to shelter further into 2022 as we assess shelter need and amounts of CARES Act and other emergency funding available. .

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AP-35 Projects – 91.220(d)

Introduction

The following projects have been identified for funding during the 2022 program year. However, at the time of publication of this draft Annual Action Plan, the City of Colorado Springs has not been notified by HUD of the precise amount of funding to be allocated to the City for the 2022 program year. With this in mind, the following projects have been allocated a percentage of each funding source (CDBG, HOME or ESG). The actual funding amounts will be updated once the 2022 funding allocations are published by HUD.

Projects

#	Project Name
1	CDBG: Administration (20%)
2	CDBG: Housing Programs (35%)
3	CDBG: Public Facilities & Infrastructure (25%)
4	CDBG: Public Services (15%)
5	CDBG: Economic Development (5%)
6	HOME: Administration (10%)
7	HOME: CHDO Reserves (15%)
8	HOME: Non-CHDO Development Activities (45%)
9	HOME: Homebuyer Assistance Program (10%)
10	HOME: TBRA (20%)
11	ESG: Homeless Housing and Services

Table 7 - Project Information

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

The division of projects here are largely the result of the community needs that emerged through the data analysis, community participation, and stakeholder consultations of the 2020-2024 Consolidated Plan process. Through these efforts, the City identified five (5) priority needs and associated goals to address those needs. All activities selected for funding must address the identified goals and priority needs.

To paraphrase several stakeholders in the 2022 planning process, the greatest obstacles to addressing

the underserved needs of the community fall into the following categories:

- Rising housing costs and insufficient inventory.
- A lack of funding from a variety of sources to address the full spectrum of affordable housing and supportive services needs of our residents.
- Finding households at risk of homelessness or displacement *before* they are in crisis.
- Full community awareness of where resources exist and how to apply or prove eligibility.

The CDD allocation plan works with these obstacles by finding the right partners to leverage funding, enhance public awareness, and build momentum around our priorities.

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AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG: Administration (20%)
	Target Area	
	Goals Supported	1A. Expand Public Infrastructure 1B. Improve Public Infrastructure Capacity 1C. Improve Access to Public Facilities 2A. Provide for Owner Occupied Housing Rehab 3A. Provide Supportive Services for Special Needs 3B. Provide Vital Services for LMI Households 4A. Direct Assistance to For-Profit Businesses
	Needs Addressed	Expand/Improve Public Infrastructure & Facilities Preserve & Develop Affordable Housing Public Services & Quality of Life Improvements Economic Development Opportunities
	Funding	CDBG: \$707,255
	Description	Administration of the CDBG Program for the City of Colorado Springs throughout the 2021 program year. This will include staff salaries, consulting and other technical assistance services as well as program planning efforts. These administrative efforts support the successful completion of all other CDBG funded projects and activities. Administrative funding is capped, by HUD regulations, at no more than 20% of the annual CDBG allocation.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Admin efforts affect all beneficiaries of the program: all will be low-to-moderate income and the majority will fall into special needs category during the 2022 program year.
	Location Description	Citywide administration of the CDBG program.
	Planned Activities	Staff salaries, planning, general admin
2	Project Name	CDBG: Housing Programs (35%)
	Target Area	

	Goals Supported	2A. Provide for Owner Occupied Housing Rehab 2B. Increase Homeownership Opportunities 2C. Increase Affordable Rental Housing Options
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	CDBG: \$1,237,697; Program Income: \$200,000
	Description	The City will utilize 35% of its annual CDBG allocation plus its program income to support a variety of housing rehabilitation programs to support low-income homeowners and renters throughout the City.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	95 LMI households, the majority of which will be very low income and have special needs, will benefit from these programs during the 2022 program year.
	Location Description	Citywide CDBG housing programs.
	Planned Activities	Owner occupied housing rehab, single and multifamily rehabilitation of rental properties, and homebuyer activities.
3	Project Name	CDBG: Public Facilities & Infrastructure (25%)
	Target Area	
	Goals Supported	1A. Expand Public Infrastructure 1B. Improve Public Infrastructure Capacity 1C. Improve Access to Public Facilities
	Needs Addressed	Expand/Improve Public Infrastructure & Facilities
	Funding	CDBG: \$884,069
	Description	The City will utilize 25% of its annual CDBG allocation for expansion and improvements to public facilities and infrastructure through public health and accessibility investments.
	Target Date	3/31/2023

	Estimate the number and type of families that will benefit from the proposed activities	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7,500 Persons Assisted
	Location Description	Low to moderate income neighborhoods throughout the City.
	Planned Activities	At this time the City has not identified specific activities for this funding, only priority project types, like health equity investments and neighborhood improvements connected to School District 11 campus projects. These funds will be awarded on a competitive basis. Staff will continue to review applications for funding as well as City managed projects to identify eligible and suitable activities for funding.
4	Project Name	CDBG: Public Services (15%)
	Target Area	
	Goals Supported	3A. Provide Supportive Services for Special Needs 3B. Provide Vital Services for LMI Households
	Needs Addressed	Public Services & Quality of Life Improvements
	Funding	CDBG: \$530,442
	Description	The City of Colorado Springs will continue to provide support for local service providers with a focus on services for special needs populations including homeless services and services for seniors. Public services are typically offered by non-profit partners of the City. The City is limited, by CDBG regulations, to utilizing up to 15% of the annual allocation and program income for Public Services activities.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 2,500 Persons Assisted
	Location Description	Citywide public services for those in need of household stabilization services (food insecurity, housing insecurity, health needs, counseling, etc.), experiencing homelessness, or at risk of becoming homeless, as well as seniors.

	Planned Activities	At this time the Division has not identified specific activities to receive funding. The Division will publish a Notice of Funding Availability (NOFA) in March 2022 to solicit applications for Public Services projects that serve vulnerable populations
5	Project Name	CDBG: Economic Development (5%)
	Target Area	Citywide
	Goals Supported	4A. Direct Assistance to For-Profit Businesses
	Needs Addressed	Economic Development Opportunities
	Funding	CDBG: \$176,814
	Description	The City will allocate 5% of the annual CDBG allocation to support for-profit businesses throughout the community. Funds will be shifted from initial target of façade improvements to continue helping small businesses survive challenges brought on by the pandemic.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	The city estimates assisting 10 local microenterprise businesses with training, coaching and consulting support to improve longevity, through a nonprofit business accelerator partner.
	Location Description	Citywide based on participant eligibility, however, priority will be given to businesses located in SE Colorado Springs.
	Planned Activities	The City will partner with a business accelerator to provide assistance to for-profit businesses to provide training, coaching and consulting for business sustainability.
6	Project Name	HOME: Administration (10%)
	Target Area	
	Goals Supported	2B. Increase Homeownership Opportunities 2C. Increase Affordable Rental Housing Options
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	HOME: \$174,273
	Description	The City will utilize 10% of the annual HOME allocation for administrative expenses including staff salaries, planning efforts as well as consulting and technical assistance efforts.
	Target Date	3/31/2023

	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide administration of the HOME program.
	Planned Activities	General administrative expenses including staff salaries, planning efforts as well as consulting and technical assistance efforts
7	Project Name	HOME: CHDO Reserves (15%)
	Target Area	
	Goals Supported	2B. Increase Homeownership Opportunities 2C. Increase Affordable Rental Housing Options
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	HOME: \$261,410
	Description	CDD is budgeting 15% of the annual HOME allocation for eligible Community Housing Development Organizations (CHDOs) to develop affordable housing throughout the City.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Added: 4 Single Family Residences Families to benefit include consideration for underserved groups including minority and single head of household populations.
	Location Description	Citywide
Planned Activities	The City intends on partnering with Pikes Peak Habitat for Humanity (PPHFH) to provide down payment assistance to first-time homebuyers as a 2022 Program Year CHDO project. PPHFH will construct these residences in 2022 and CDD will provide a portion of the down payment assistance. The remainder of the funding in this category will support affordable housing opportunities for low-to-moderate income families throughout the City. This could include homeownership or rental opportunities.	
8	Project Name	HOME: Non-CHDO Development Activities (45%)
	Target Area	

	Goals Supported	2B. Increase Homeownership Opportunities 2C. Increase Affordable Rental Housing Options
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	HOME: \$ 784,229, Program Income: \$500,000
	Description	The City will allocate 45% of the annual HOME allocation for affordable housing development projects to be completed by non-CHDO developers. This may include the acquisition, rehabilitation, or new construction of affordable housing for homeownership or rental opportunities.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Rental units constructed: 643 Household Housing Units These developments will offer a combination of 1, 2, and 3 bedroom units, with a focus on working households and families who earn between 0%-70% Area Median Income (AMI).
	Location Description	Citywide
	Planned Activities	CDD is anticipating three new multifamily properties in different areas of the city to complete construction and lease up by the end of PY 2022, providing safe, stable, and affordable housing to 643 households. There are more projects in various phases of development that will receive support this program year, but will not lease up until the following year.
9	Project Name	HOME: Homebuyer Assistance Program (10%)
	Target Area	
	Goals Supported	2B. Increase Homeownership Opportunities
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	HOME: \$174,273
	Description	The City will assign 10% of the annual HOME allocation for direct financial assistance to first-time homebuyers through down payment assistance.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Ten (10) low to-moderate income families will benefit from this program during the 2022 Program Year. Families to benefit include consideration for underserved groups including minority and single head of household populations.

	Location Description	Citywide based on participant eligibility.
	Planned Activities	CDD has partnered with organizations such as the Rocky Mountain Community Land Trust (RMLCT) and Pikes Peak Habitat for Humanity to administer this program and is evaluating other partner organizations to create homebuyer opportunities. The program includes funding for minor rehabilitation of residences in order to meet health and safety property standards, where applicable. Eligible homebuyers are required to complete HUD-approved Housing Counseling.
10	Project Name	HOME: TBRA (20%)
	Target Area	
	Goals Supported	2C. Increase Affordable Rental Housing Options
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	HOME: \$348,546
	Description	The City will allocate 20% of the annual HOME allocation for Tenant Based Rental Assistance (TBRA). The program will be administered by the Colorado Springs Housing Authority. Much like the Section 8 Housing Choice Voucher Program, eligible program participants will receive direct rental assistance which will allow them to identify a home of their choosing anywhere in the City.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 40 extremely low-income individuals or families will benefit from this program during the 2022 program year.
	Location Description	Citywide based on participant eligibility.
	Planned Activities	Tenant Based Rental Assistance in partnership with the Colorado Springs Housing Authority. A secondary TBRA program for displaced seniors to be administered by a community partner TBD in early 2022.
11	Project Name	ESG: Homeless Housing and Services
	Target Area	Citywide
	Goals Supported	5A. Provide Homeless Rapid Re-Housing Assistance 5B. Provide Assistance to Homeless Shelters

Needs Addressed	Homeless Housing & Supportive Services
Funding	ESG: \$288,897
Description	The City will allocate the annual ESG allocation as follows: 7.5% for general administrative expenses, 60% for homeless shelter operational support and street outreach, 15% for supporting the Homeless Management Information System (HMIS) - a database system required for all ESG funded agencies, and the balance of 17.5% will be utilized for rapid re-housing and homelessness prevention programs.
Target Date	3/31/2023
Estimate the number and type of families that will benefit from the proposed activities	An estimated 3,000 extremely low-income individuals or families experiencing homelessness, or at risk of becoming homeless, shall benefit from the shelter programs during the 2022 program year.
Location Description	Citywide
Planned Activities	<p>The Division will publish a Notice of Funding Availability (NOFA) in March 2022 to solicit applications for ESG projects that serve populations at risk of and experiencing homelessness.</p> <p>General Program Administration = 7.5%;</p> <p>Shelter Operations and Street Outreach = 60%;</p> <p>Homeless Management Information System =15%;</p> <p>Rapid Re-housing & Homelessness Prevention Programs =17.5%</p>

AP-50 Geographic Distribution – 91.220(f)

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

According to 2019 ACS data, 118 census tracts (44% of all tracts) in the City are CDBG eligible, meaning over half of the residents in each of those tracts make 80% or below area median income (AMI). These tracts exist in all areas of the city, but dominate the central, eastern, and southern areas. There are 52 tracts in which over 20% of the population lives in poverty. One Census tract is designated a Racial/Ethnic Concentration of Poverty (R/ECAP) by HUD, meaning that its non-white population is over 50% and its poverty rate is either 1) higher than 40% or 2) more than three times the average poverty rate of tracts in the metropolitan area (it meets the 2nd). While there are not many R/ECAPs, the data in our Consolidated Plan shows that minority groups in Colorado Springs do experience disproportionately higher rates of housing instability and poverty.

Because eligible neighborhoods and vulnerable populations are geographically dispersed in Colorado Springs, the City allocates funds based on other factors that include analysis of neighborhood/populations needs, level of existing coordination and investment, affordable housing needs, and the strengths and merits of applications for competitively awarded funds. The City's overall budget and strategic initiatives are also factored into funding decisions to leverage other resources for shared priorities. Whenever beneficial, the City seeks to combine block grant funds with City General Funds, capital improvement funds, or other financing of affordable housing projects.

Community Development staff partners with their colleagues in all city departments and with local leaders, such as City Council members, Council boards and commissions, faith leaders, service providers, student groups, and neighborhood advocates to identify areas with urgent needs and to make immediate investments to increase accessibility, improve health and housing outcomes, and, especially urgent in the context of the pandemic, maintain housing stability for those at risk of losing their homes.

When awarding funds, Division staff does not make neighborhood location a required criterion for service providers serving income-eligible clients. However, it is a consideration dependent on neighborhood conditions and needs and the applicant organization's ability to demonstrate inclusivity and anti-discriminatory practices in marketing, staffing, programming, and outcomes for Colorado Springs' most vulnerable populations.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

In accordance with the 2020-2024 Consolidated Plan, the Division does not have geographic target areas.

In 2022, the Division will continue to rely on a competitive, citywide process for grant funds, prioritizing those that serve the most vulnerable populations, demonstrate project readiness, and promise high-impact outcomes. Our policies and procedures in receiving applications for funds, such as the underwriting process for housing projects, the external application review committees for CDBG and ESG projects, the citizen participation opportunities, et cetera, all work together to make sure we do not inequitably favor one neighborhood or part of the city over others. We also work extensively – and continue to build more institutional relationships – with the City’s Planning Department, Colorado Springs Utilities, and other entities to ensure that our projects complement other public and private initiatives in high-needs areas, maximizing neighborhood benefits.

Discussion

N/A

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The following one-year goals have been established based on the indicators and scope of the City of Colorado Springs' projects this year.

One Year Goals for the Number of Households to be Supported	
Homeless	70
Non-Homeless	593
Special-Needs	80
Total	743

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	40
The Production of New Units	593
Rehab of Existing Units	95
Acquisition of Existing Units	15
Total	743

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The goals outlined in the above tables are specific to HUD-defined programs and are meant to guide the allocation of HUD funds to support community-wide efforts to address homelessness, promote housing stability for low-income households, and increase the supply of affordable and accessible housing for disabled populations. New this year the Division plans to add additional homeowner assistance support for first time low-income homeowners.

CDD's programs support an overall City-wide goal established by Mayor John Suthers to build, preserve, or make available for purchase an average of 1,000 units of affordable housing each year. This goal is met by many community partners, not all utilizing HUD funding.

In the coming year, the Division expects three highly anticipated projects to begin leasing up. The Creek at Cottonwood, a 258-unit project in the northeast portion of our city; Draper Commons, a 280-unit, 100% universal design project on the outskirts of downtown; and The Commons, a 50-unit permanent supportive housing project. The need for this large influx of units continues to grow as local average

rents top \$1,500 a month, a 17% increase from the same period last year.

In an effort to reduce the overall cost of building multifamily affordable housing, the Division has partnered with Colorado Springs Utilities to launch a new fee offset program for affordable multifamily rental housing development beginning in January 2022.

Affordable and attainable housing development is highly sensitive to development cost increases. Unlike market rate projects where rents can be raised to account for higher development costs, affordable rental housing must hit rent targets to be eligible for the most common types of financing available. Maintaining lower rents on a project results in greater subsidies needed or fewer units developed.

Some development cost components are largely immune to local intervention. The price of materials is set in global markets. The availability and cost of land is largely a free market issue. Securing timely and reliable subcontract labor is increasingly set in the context of high development activity up and down the Front Range. Focusing on development charges at the local level is one of the few tools local government has available to reduce costs and encourage development of new affordable units.

The City's new Multifamily Affordable and Attainable Rental Housing Fee Offset program makes available a fund that can be accessed to assist with development charges accrued to multi-family rental projects. Based on overall project score, developers can apply for funds to help offset the cost of various development charges from Land Use Review, Parkland Dedication Ordinance, Public Works, and Colorado Springs Utilities.

The program does not constitute a fee reduction or waiver. Each project applying for access to funds will continue to have all fees determined at current levels. The key difference lies in the method of fee payment. As an example, projects that qualify for a 40% fee offset would be able to access that amount from the fund, while the developer/project sponsor would continue to be responsible for paying the 60% balance. The Division is looking forward to the launch of this program and the impact it will have on new affordable housing development.

AP-60 Public Housing – 91.220(h)

Introduction

The Colorado Springs Housing Authority (CSHA) is funded by HUD's Office of Public and Indian Housing. CSHA receives an annual budget from HUD of approximately \$25M. CSHA funds are separate from the grant funds received from HUD each year by the City of Colorado Springs though many of the projects and activities are similar. CSHA funds are used for rental assistance, CSHA operating expenses, and capital improvements to CSHA's portfolio of public housing. CSHA owns 700+ units of public and senior housing and manages an additional 800+ units of affordable rental housing through partnerships with private landlords. CSHA administers an annual allocation of rental assistance vouchers provided through the Section 8 Housing Choice Voucher Program. The vouchers help over 2,000 households keep up with rising rents across the community. Since the Low-Income Housing Tax Credit (LIHTC) program was founded, CSHA has participated as a special limited partner in the development of approximately 1,500 affordable rental units. CSHA also administers a Tenant-Based Rental Assistance (TBRA) Program, serving 30-40 households each year with funds from the HOME Investment Partnership Program managed by the City of Colorado Springs' Community Development Division.

CSHA's rental assistance voucher program is consistently over-subscribed, an indication of persistent rental housing un-affordability across the region. Based on the unit size preference culled from its wait list, CSHA has long recognized the need for larger affordable two- and three-bedroom apartments to meet demand. In 2020, CSHA received an allocation of tax-credit financing to redevelop a property in its portfolio located on Fountain Boulevard adjacent to the Shooks Run Creek. The project consists of replacing 26 units of outdated public housing with 40 new units of two-bedroom and three-bedroom rental housing serving individuals below 50% of the Area Median Income (AMI). The project broke ground in summer 2020, and will be leasing up by the end of 2021.

In 2022, CSHA plans to carry out a broad range of affordable housing activities utilizing its annual formula grant from HUD to leverage tax-credit financing as well as HOME and CDBG funds from the City of Colorado Springs. CSHA is unique in its mission to provide housing for extremely low-income households in the region. Approximately 1/3 of public housing residents are extremely low-income seniors, many with disabilities. The needs assessment conducted for the Division's 2020-2024 Consolidated Plan showed working families make up another significant percentage of households served by CSHA. Even with rental assistance, many of these families struggle to secure safe, decent housing in the current market.

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

Federal funding for much-needed capital improvements to the public housing inventory continues to decline. Year over year, funds for capital improvements represent a diminishing percentage of HUD's budget even as HUD continues to issue directives to improve public housing, most notably by increasing the number of affordable and accessible units in the public housing inventory. In 2019, the Community

Development Division (CDD) entered into a multi-year agreement with CSHA to address the accessibility of its aging housing stock. In 2022, CSHA and CDD will continue working together to modify existing units to increase accessibility according to the timetable established in CSHA's Section 504 Transition Plan approved by HUD. Community Development will provide \$500,000 of CDBG affordable housing funds in 2022 to accomplish this effort.

CDD will provide ongoing funding for a Tenant-Based Rental Assistance (TBRA) program administered by CSHA. The program prioritizes housing for extremely low-income individuals exiting homelessness. CSHA is an active participant in the community's Coordinated Entry System, making the TBRA program a vital bridge between homelessness and housing. CDD will renew its grant agreement with CSHA for up to two years of additional HOME funding.

In response to the needs shared in its consultation with CSHA staff during the 2022 AAP public process, CDD has also agreed to support an additional housing navigator for clients with housing vouchers, who are having a harder time finding units available due to new and unforeseen barriers to market housing in a tightening housing market.

CDD recognizes the unique role CSHA plays in addressing housing affordability in the region. CSHA's long-time presence and standing in the community provide stability in a volatile housing market. CSHA's consistent focus on, and prioritization of, the housing needs of extremely low-income households represents an ongoing commitment to housing the most vulnerable. In 2022, CDD will maintain an active collaboration with CSHA to increase development of affordable rental units serving very low- and extremely low-income households. CDD will continue providing letters of support for CSHA-driven low-income housing tax credit projects. CDD will actively facilitate approval of necessary land entitlements by acting as a liaison between CSHA and the Planning Department, and CDD will prioritize use of the City's HUD funds for CSHA projects. All these actions are consistent with HomeCOS, the City's affordable and attainable housing plan released in Spring 2020.

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

In prior years, CSHA administered a home buyer program designed to promote home ownership in low- to moderate-income households. The program provided homebuyer education and counseling with down payment assistance consisting of subsidies from the Colorado Division of Housing and the Federal Home Loan Bank of Topeka, an FHA lender. Due to reduced funding for program administration, CSHA decided several years ago to no longer offer a homebuyer program. Currently, CDD partners with the Rocky Mountain Community Land Trust (RMCLT) and Pikes Peak Habitat for Humanity (PPHH) to administer similar programs. CDD encourages RMCLT and PPHH to include public housing residents in its outreach and marketing efforts.

CSHA encourages its residents to become more involved in management of the public housing portfolio

through the Resident Advisory Board (RAB). RAB is open to all CSHA residents. It is currently made up of 6 to 7 residents who set the agenda and convene other tenants to discuss housing and neighborhood issues. CSHA Board meetings are publicly noticed and open to tenants and members of the general public, providing opportunities to raise resident concerns for discussion and to share management decisions with the community at large.

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

The CSHA is not designated as troubled.

Discussion

N/A

DRAFT

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

Introduction

The Division will continue to support the City's Homelessness Prevention and Response Coordinator in maintaining programs established through the City's 2019 Homelessness Initiative.

Though not a direct service provider, the City of Colorado Springs engages with the Pikes Peak Continuum of Care (PPCoC), business leaders, policymakers, and service providers in our shared goal of making homelessness in the Pikes Peak region brief, rare, and non-recurring. The Community Development Division and the PPCoC Governing Board collaborate on project awards to ensure the highest priorities are funded first and that the projects and programs complement each other, and do not leave out any critical eligible services. The Division participated in the PPCoC's Systems Design Clinic in January 2021 with the National Alliance to End Homelessness, which set the stage for creating a new Pikes Peak Continuum of Care Strategic Plan.

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

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

- Continue COVID mitigation through funding and coordination of the Homeless Isolation Shelter in collaboration with the PPCoC and subrecipients.
- Use ESG-CV round 2 funds to support shelter clients with increased health services and to support front-line shelter staff with hazard pay.
- Find ways to build on the successful homeless outreach team project in collaboration with the Colorado Springs Fire Department.
- Improve support for families experiencing homelessness by working with key organizations in siting and planning for a low-barrier family shelter.
- Create a broader understanding among the public and local officials of the scope and character of the homelessness, in coordination with the PPCoC and utilizing the HelpCOS web portal.
- Maintain the successful Homeless Outreach court program established in 2020, once the COVID restrictions are lessened enough to continue.
- Ensure continuation of the new WorkCOS homeless work program, which provides paid employment in the City's Public Works department for individuals experiencing homelessness. Five people were employed through the program in its first year, with one hired full time.
- Maintain HomeCOS goals to prioritize funds for housing projects serving very low- and extremely low-income households, incentivize more landlords to accept housing vouchers and to reduce unjust evictions.
- Continue to provide support through Veterans Housing Incentive Fund in partnership with Rocky

Mountain Health Services' Homes for All Veterans, when changes in COVID restrictions allow.

- Use HOME funds to support the development of a second permanent supportive housing project in the city expected to lease up in 2022.
- Convene homeless service providers to determine use of HOME-ARP funds in 2022 and beyond

The City's Homelessness Prevention and Response Coordinator met all five goals of the 2019 Colorado Springs Homeless Initiative. One of the goals, increase access to shelter and services, has an outreach-specific objective to 1) pilot a homeless outreach program in downtown Colorado Springs and 2) evaluate results to assess possibility of long-term expansion. The Division allocated ESG-CV funds to the Colorado Springs Fire Department to build on this successful pilot program and support adult outreach services in 2021. Our Homelessness Prevention and Response Coordinator and CSFD staff are exploring funding sources to continue it in 2022.

The City's Homelessness Prevention and Response Coordinator will also continue working with local first responders on street outreach and connecting unsheltered residents to shelter, health services, food, and other critical services, including housing.

City staff and PPCoC members also rely on the work of the local Coalition of Homelessness Advocates and Providers (CHAP), made up of service providers and interested community members who meet monthly to discuss homeless issues, and to communicate current needs and conditions of this population. Members of this group work firsthand in reaching out to those experiencing homelessness or who are at risk of homelessness in Colorado Springs.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City and its partners will build on the significant progress made in addressing the shelter needs for Colorado Springs since the last Consolidated Plan.

Springs Rescue Mission, the City's first low-barrier shelter, can now offer up to 450 beds year-round for adult men and women. Salvation Army has also undergone facility changes to accept low barrier single adults while also accommodating families. While there are day centers and auxiliary services for families experiencing homelessness, there is still a lack of adequate family shelter space for families with children and a lack of transitional housing for placement out of shelter. The City is committed to supporting a new family shelter facility to serve Colorado Springs from the planning period through construction and operation.

In 2022 and through the remainder of this current Consolidated Plan, the City's federal funds will continue to support programs to provide decent and safe living environments for people experiencing

homelessness and those at risk of becoming homeless, through funding such activities as:

- Using ESG funds for emergency shelter operations, shelter expansion and rehabilitation
- Using CDBG funds for transitional housing rehabilitation and supportive services
- Using HOME funds to support development of permanent supportive housing, rental assistance and relocation assistance for people exiting homelessness through tenant based rental assistance.
- Using ESG funds for rapid re-housing programs, complete with case management, for up to two years.

The City will also continue to fund nonprofits that provide eligible critical wrap-around services for people in shelters and transitional housing.

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

The City only supports organizations that offer supportive services such as counseling and case management to help individuals experience homelessness make the transition from shelter to safe and stable housing via ESG and CDBG funds. These are available annually on a competitive basis.

The City provides administrative assistance to the PPCoC via ESG dollars to maintain a reliable data system (HMIS) and robust coordinated entry process. This involves surveying all clients experiencing homelessness on their needs and sharing this information system-wide to provide seamless care and best identify and coordinate housing and supportive services. Competitive CoC and ESG funds will be awarded only to agencies that participate in HMIS and the coordinated entry process. Performance, via various metrics like successful exits to housing and housing stability, will be evaluated annually as part of the application process.

In 2021 the Division allocated ESG-CV funds to support these efforts. A new landlord incentive fund managed by the PPCoC will continue to help subrecipients of Rapid Rehousing and Homelessness Prevention get vulnerable families into housing in a competitive housing market in 2022 until the ESG-

CV expenditure deadline expires.

The City will continue to prioritize the creation of affordable housing for the most vulnerable, including those experiencing homelessness and extremely low-income households. We will accomplish this by:

- Using revenue from private activity bond fees to lower barriers for organizations (such as homeless service providers) to enter the affordable housing development field by covering pre-development phase costs.
- Facilitate more collaboration between service providers and developers to apply for Low Income Housing Tax Credits (LIHTC) funding for permanent supportive housing for residents with chronic conditions that would otherwise be homeless.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Eviction and displacement prevention is more urgent than ever now the eviction moratoria have expired, and rents keep rising. Stable housing is not only key to slowing the spread of infectious disease during a pandemic, but also a key indicator of long-term health. The Division devoted much of its CDBG-CV and ESG-CV funding to housing stability activities like rental assistance and case management. Even with unprecedented funding from the CARES Act and the U.S. Treasury, it is increasingly harder to get and keep very low-income people, especially those exiting institutional care, housed. The following are some barriers reported by CDD subrecipients:

- Even with source of income discrimination laws in place, rental applications now require other financial documentation that screen out LMI households, such as:
 - Cash on hand requirements, e.g., evidence of over 3 months' rent on hand
 - Credit score minimums
- Renter's insurance requirements
- Refusal to accept applicants with prior evictions
- Refusal to cooperate with rental assistance programs
- Lack of affordable ADA units
- Lack of permanent supportive housing for people with chronic conditions
- Service provider staff turnover

Community Health Partnership, administrator of the Pikes Peak Continuum of Care, has been a critical

player in identifying the full scale of barriers like these and initiated several actions in 2021 that will become fully operational in 2022.

The Division will continue to serve this population by prioritizing housing stability activities with 2022 CDBG funds. We will also continue to fund Homelessness Prevention and Rapid Rehousing activities with 2022 ESG funds. The application for these funds will open in March 2021.

Discussion

N/A

DRAFT

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

Introduction:

The City has seen the growth of affordable housing advocacy groups convening, gathering data, providing research and information, and engaging residents in dialogue and direct action. These groups are targeting the housing issue from a variety of angles, such as local ordinances, board and commission representation, development incentive tools, and anti-NIMBY (Not In My Backyard) sentiment. These groups, while operating outside of local government, generally complement the work Community Development can do with the limited federal funding and create positive momentum for more local tools to make *both* more affordable housing and housing more affordable.

Division staff spent the majority of 2021 marketing the Emergency Rental Assistance Program funded by the U.S. Treasury. Even in the face of this unprecedented year of supplemental housing assistance, the need outpaces the resources in many ways that this funding cannot address.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

2022 will be the third year implementing the City's affordable and attainable housing plan (HomeCOS) and with further progress planned. The Division plans to carry out the following actions in 2022 to increase access to affordable housing:

- Allocate bond issuing fees to the creation of a fund to help non-profit development sponsors with soft costs, or expenses incurred before any grants or public financing kick in. This will help reduce barriers to developing affordable housing for small-scale, local organizations and ensure that the development pipeline remains full in the region.
- Monitor the new landlord incentive fund established with CARES Act ESG (ESG-CV) funds by Community Health Partnership, our Continuum of Care administrator, to help house individuals and families at the most risk of being denied housing from private landlords.
- Leverage funding to incentivize coordination and cross-training of housing navigators.
- Fund an additional housing navigator at the Colorado Springs Housing Authority.
- Continue to advocate for affordable housing-friendly land use policies by participating in ReToolCOS, the Planning Department's rewrite of the City's land development code.
- Continue to partner with the Economic Development Division on the implementation of the Rapid Response designation for new multi-family, affordable housing. Rapid Response prioritizes projects during the land use and building code review process, ensuring that much-needed housing can be brought into the development pipeline quickly.
- Launch the Affordable Multifamily Rental Offset Fee program with Colorado Springs Utilities prioritizing and offsetting development and utility infrastructure fees for affordable multi-family

housing developments.

- Collaborate with Colorado Springs Utilities to design an energy efficiency modification program to benefit low-income renters
- Continued advocacy for affordable housing through public forums.
- Collaborate with state and local nonprofits to create multimedia tenant guides to housing quality standards, Fair Housing, reasonable accommodations, and renter education.
- Redesign and maintain updated Community Development Division website to improve accessibility of information for affordable housing developers, service providers, policy makers and residents seeking housing resources.
- Continue collaboration with community advocates to produce digital and in-person workshops for renters on their rights and responsibilities.
- Provide continuously updated Renter Rights Guide as a free download on the City's website.
- Work with our CHDOs and other housing subrecipients on affirmative marketing strategies.
- Prevent unjust evictions by supporting access to free legal counsel for low-income tenants by supporting Colorado Legal Services. Wrongful evictions disproportionately affect minorities, families with children, the elderly, and people with disabilities. By supporting this program for low-income residents with a wrongful eviction, we are affirmatively furthering fair housing goals and protecting vulnerable communities from barriers to fair housing.

Discussion:

N/A

AP-85 Other Actions – 91.220(k)

Introduction:

In accordance with the goals and objectives outlined in the 2020-2024 Consolidated Plan, CDD will undertake the other actions described below.

Actions planned to address obstacles to meeting underserved needs

During the pandemic shutdown, like every other jurisdiction, the Community Development Division shifted to exclusively using digital tools for outreach and engagement. There were notable silver linings, such as increased accessibility and convenience for residents. We have continued to utilize these tools, even as public health guidelines are lifted, to retain the benefits of 1) closed captioning for the hearing impaired, 2) instant translations in multiple languages, and 3) cell phone usability for residents whose primary connection to the internet is their cell phone. We will also explore hybrid options to regain the deeper engagement afforded by in person events.

CDD staff will continue to work with our City Communications Department on inclusive participatory practices, as well as with the Office of Accessibility on creating accessible documents.

This year, the Division will expand on new relationships with other departments/organizations that were established in 2021, such as:

- Colorado Springs School District 11, the City's largest district serving majority low-income, minority students and families;
- City's Comprehensive Planning Division, by providing general fund and staff support on its 2021 health equity area plan for multiple low-income neighborhoods in Southeast Colorado Springs.
- Exponential Impact, a local business incubator, to assist microenterprises in underserved communities to create sustainable business practices and receive critical training and professional services.

Actions planned to foster and maintain affordable housing

Developing and maintaining an adequate supply of affordable housing is a high priority need in the community. Addressing substandard conditions in the existing affordable housing stock is critical to achieving this goal. Throughout 2020 and 2021, CDD worked extensively with local partners on implementing our affordable housing plan.

In 2022, CDD plans to take the following actions:

- Administer housing rehabilitation programs for very low- and extremely low-income households that address the service life of key building components such as sewer and water lines, hot

water heaters, furnaces, and electrical systems. Failure of these building systems is often costly and can lead to housing instability.

- Fund emergency housing assistance programs to help households who lost income due to the pandemic stay housed.
- Advocate for flexible land use policies that allow for multiple housing types in as many areas of the city as possible.
- Monitor multifamily buildings whose affordability periods expire soon and pursue strategies to extend affordability and prevent displacement.
- Enter third year of the agreement with the Colorado Springs Housing Authority to further its Section 504 Transition Plan. The plan requires CSHA to carry out ADA modifications to units in its inventory, however, federal funding for this effort has been reduced each year.
- Continue issuance of Private Activity Bonds (PABs) for affordable housing financing.
- Increase collaboration with the City Planning Department to provide private developers with information intended to minimize involuntary displacement of low- to moderate-income households.
- In 2021, HUD staff confirmed that an ADU grant program is currently incompatible with HOME funds. Division staff will pursue other funding sources for an ADU construction assistance program to increase affordable rental housing stock in the community, while also helping homeowners build equity and stabilizing neighborhoods.
- Provide funding for acquisition/rehabilitation projects to increase the number of affordable rental units.

Actions planned to reduce lead-based paint hazards

The elimination of lead-based paint hazards in existing housing is an important part of CDD's strategy for addressing potential health conditions faced by at-risk low- to moderate-income families, particularly those with young children in target housing. All housing rehabilitation and affordable housing preservation projects include testing for lead-based paint and related hazard elimination activities when needed. To ensure compliance with HUD's Lead Safe Housing Rule, a senior staff person with extensive construction experience and HUD/EPA training in the identification and elimination of lead-based paint hazards oversees this effort. The Division's goal is to increase the number of hazard-free, affordable housing units available in the community.

Actions planned to reduce the number of poverty-level families

Our CDBG, ESG, and HOME funds will continue to target our most vulnerable households – seniors, disabled, and very low-income households – via the following programs in 2021:

- CDBG Public Services – Successful applicants for these funds will prioritize wraparound services and case management to help clients increase income and/or achieve housing stability.
- CDBG Affordable Housing – rehabilitate homes of low-income homeowners to improve health

outcomes and prevent displacement; assist in rehabilitating public housing units for accessibility, increasing the number of public housing apartments for people with disabilities.

- CDBG Economic Development – assist very small businesses with training and professional services to create and retain jobs in low-income neighborhoods.
- ESG – Successful applicants for Homelessness Prevention, Rapid Rehousing, and Shelter Operations funds will prioritize wraparound services and case management to help clients increase income.
- HOME Affordable Housing – gap financing for development of multi-family rental projects serving very low and extremely low-income households, and down-payment assistance for low-income households seeking opportunities for homeownership.
- City developed and implemented a new Homeless work program called WorkCOS. This program employs 8 individuals at a time. WorkCOS team perform median maintenance clean ups.

Actions planned to develop institutional structure

CDD is continually building institutional structure by improving collaboration between City Departments, providing annual training opportunities for staff, building relationships in the community, and developing and offering technical assistance to its partner agencies in the community. In 2022, CDD plans to take the following actions:

- Participate in land use review related to affordable housing projects.
- Continue meeting and collaborating with the state's other ESG grantees to share best practices and problem solve.
- Develop impact studies to relate the economic and social impact of the projects CDD funds.
- Participate in internal City committees charged with budgeting for capital improvements and ADA compliance.
- Offer at least one HUD approved training opportunity for each CDD staff member.
- Offer more application workshops and technical assistance for subrecipient staff on compliance with HUD regulations and reporting requirements.
- Use monitoring to engage subrecipients on improvements to program delivery, policy documents, and best practices.
- Create subrecipients resources on website.
- Continue cooperation between the Economic Development, Public Works, and Parks, Recreation, and Cultural Services Departments.
- Create process for applicant organizations in need of emergency assistance outside of NOFA cycles.
- Participate in fair housing coordination.
- Explore Community Development Financial Institutions in the state and southwest region in preparation for increased economic opportunities for the 2020-2024 Consolidated Plan period. While there are no CDFIs based in Colorado Springs, www.cdfi.ogov shows several serving the state. Assist Colorado Springs' only community development corporation (CDC), Solid Rock CDC,

in building capacity to carry out major projects.

- Create fact sheets on local accomplishments for state and federal representatives

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

Community Development staff is very connected to the community it serves. Two CDD staff members continue to serve as ex officio board members of the Pikes Peak Continuum of Care. This representation ensures efficient use of resources to address high priority needs related to homelessness identified in the Consolidated Plan, while also educating CDD staff on the frontline needs of service providers.

CDD and the El Paso County Community Development Department will continue their quarterly meetings to review and coordinate the use of federal funds in the region.

CDD management continues to be the main contact for affordable housing developers seeking public financing using local resources such as private activity bonds and HOME Investment Partnership (HUD) funds. Typically, the funds are paired with low-income housing tax credits administered by the Colorado Housing Finance Authority (CHFA) to develop new multi-family affordable housing. The CDD manager currently serves on the CHFA Tax-Credit Advisory Group (TAG) providing input on policies and procedures governing the allocation of housing tax credits state-wide. Additionally, a full-time staff member will be dedicated to the lifecycle management of affordable housing development.

CDD staff also remains active and participates in forums, panels, committees, and neighborhood meetings throughout the year to discuss grant funding, affordable housing, neighborhood needs, homelessness, infrastructure, etc. Examples of organizations we have collaborated with on such projects

or events:

- Affordable Housing Collaborative
- Council of Neighbors and Organizations (CONO)
- RISE (Resilient, Inspired, Strong and Engaged) Coalition
- Colorado Springs Pro-Housing Partnership
- Colorado Springs Utilities
- Pikes Peak United Way
- Colorado Springs Urbanites
- Innovations in Aging
- The Independence Center
- Mill Street Neighborhood Association
- Poor People's Campaign (Colorado Chapter)
- Colorado Housing Finance Authority
- Pikes Peak Library District
- The Justice Center
- Brothers Redevelopment
- Colorado Legal Services

Discussion:

N/A

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

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

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

Not applicable.

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

Introduction

The Colorado Springs single-family home market is experiencing rapid price increases. Between November 2021 and November 2022, the median sales price for a single family home has increased 18.42% from \$385,000 to \$450,000 according to Pikes Peak Association of Realtors. In this price environment, the Community Development Division (CDD) is opting to include resale provisions in each homebuyer transaction carried out by its Subrecipients to preserve affordability. In Program Year 2022, CDD is funding two homebuyer programs with HOME, one through the Rocky Mountain Community Land Trust (RMCLT) and one through Pikes Peak Habitat for Humanity (PPHFH). Per the terms of the funding agreements executed with each subrecipient, resale provisions are included in each transaction to ensure that if the property is sold voluntarily or involuntarily prior to the end of the period of affordability it will remain affordable to a subsequent low- to moderate-income homebuyer. All homebuyer programs that CDD administers are eligible only to single-family residences that are owner-occupied by low to-moderate income households. All homebuyers attend homebuyer counseling through RMCLT, the only HUD-approved homebuyer counselor in the region.

Program Eligibility, Solicitation, and Homebuyer Funding

Both homebuyer programs supported by the Community Development Division provide a wide range of outreach through affirmative marketing plans to encourage eligible households to participate. Similarities and differences among the programs are as follows:

Rocky Mountain Community Land Trust (RMCLT)

- Households ranging from 30-80% AMI can apply on a first-come, first-served basis for homebuyers who meet all of the RMLCT criteria.
- Application packets are available on-line and at the RMLCT office.
- The RMCLT website <https://rmclt.org/become-a-homeowner/> provides an outline of the steps involved in the application review, RMCLT orientation, FAQ's, and housing counseling requirements.

Pikes Peak Habitat for Humanity (PPHFH)

- Households ranging from 35-80% AMI can apply based on their need for affordable housing (unsafe, overcrowded, unhealthy, or unaffordable) during specified open application cycles. PPHFH does not retain a waiting list.
- Application packets are available online, at their office, and at the PPHFH Re-store.
- The PPHFH website <https://pikespeakhabitat.org/our-programs/homeownership/> has general program information, program qualification, and FAQ's.

Resale Provision Summary

The following is a summary of key aspects of the resale provision as it applies to activities carried out in Program Year 2022:

- The owner must notify the subrecipient of their intent to sell the property;
- The owner must allow the subrecipient the choice of exercising a right of first refusal;
- The owner must provide the subrecipient with records substantiating eligible improvements made to the property during the owner's tenure;
- The owner must cooperate with the subrecipient to establish a maximum sales price for the property that is affordable to a prospective homebuyer making no more than 80% of the area median income;
- The owner must agree to sell the property to another low- to moderate-income homebuyer.

Modest Housing

In order to ensure that housing purchased with HOME funds is modest and non-luxury, the Community Development Division (CDD) is electing to use residential real estate data, available to the public by the El Paso County Assessor (<https://assessor.elpasoco.com/assessordata/>) to determine a maximum purchase price following HUD housing market survey guidelines for the HOME program. CDD calculated the median for 906 residential sales within City of Colorado Springs city limits for May, 2021, representing all residential single-family sales. HUD requires a sample size of over 500 transactions for any 1-month period to establish a locally derived maximum value. The median sales price recorded for all records is \$400,000, where 95% of the median sales price is \$380,000. CDD will elect \$380,000 as an overall maximum purchase price for new and existing single family residences in PY2022. In general, as local market prices continue to rise on an annual basis, homebuyer programs will be required to dedicate additional subsidy to ensure sustainability and long-term affordability of ownership.

Data substantiating the calculation of the maximum purchase price is available on request.

In order to determine that properties considered for purchase by a HOME assisted buyer do not exceed the maximum purchase price, the Community Development Division directs its subrecipients to use one of two methods:

- Reference the El Paso County Assessor's website where an estimated market value of the home can be found;
- Reference an appraisal required by the primary lender for the transaction.

Fair Return on Investment

In order to ensure that the original HOME-assisted homebuyer receives a fair return on their investment at the time of the sale, subrecipients must follow Community Development Division guidelines required by HUD, for calculating the value of eligible improvements made to the property during the owner's tenure.

Examples of eligible home improvements include additions, new structures such as detached garages or wood decks, remodeled kitchens or bathrooms, flooring upgrades such as the replacement of carpet with wood flooring or tile, replacement of driveways and exterior walkways, installation of energy-efficient windows and doors, installation of wall, floor, or attic insulation, and replacement of permanently installed equipment such as furnaces or electrical panels.

Maintenance items are not considered eligible home improvements. Maintenance items include roof replacement, minor interior or exterior repairs, painting, yard work, or gutter replacement. Items completed as the result of an insurance claim are not considered eligible home improvements.

The Community Development Division provides subrecipients with an annual index derived from Pikes Peak Area Association of Realtors’ data to calculate the value of eligible home improvements based on the percentage increase or decrease in the local housing market each year. For program year 2022, the index is calculated as follows:

Take the November, 2021 median home sales price of \$450,000 and subtract the November, 2020 median home sales price of \$380,000 for a total appreciation of \$70,000. Divide the total appreciation by the median home sales price in November, 2020 to arrive at an 18.42% appreciation rate from November 2020 to November 2021.

A table illustrating the calculation of the index stated above is provided below. Based on the number of years of ownership, the sum of the indices provides an overall appreciation rate.

An example of the use of the annual index to calculate the homeowner’s fair return on investment is included in the following table:

Fair Return Index - Pikes Peak Association of Realtors			
Year	Month	Median Sales Prices	Appreciation
2020	November	\$ 380,000	
2021	November	\$ 450,000	\$ 70,000
% Change 2020-21			18.42%
(Appreciation divided by Nov 2020 Median Sales)			
Source: https://ppar.com/Documents/stats/MarketTrends/Prices.jpg			

Homebuyer's Fair Return on Investment		
Homebuyer's Down Payment	\$ 5,000.00	
Added Value of Work	\$ 10,000.00	Bathroom remodel
Total Homeowner Investment	\$ 15,000.00	
Fair Return on Investment (\$15,000 * 18.42%)	\$ 2,763.00	

Continued Affordability

As stated above in the introduction, per the terms of the funding agreements executed with each subrecipient, resale provisions are included in each transaction to ensure that if the property is sold voluntarily or involuntarily prior to the end of the period of affordability it will remain affordable to a subsequent low- to moderate-income homebuyer. For example, the Land Use Restriction Agreement (LURA) is a restrictive covenant and recorded legal instrument that ensures that the

property will be made available to a reasonable range of low- to moderate-income homebuyers. CDD requires that this agreement is included in every homebuyer transaction. Subrecipients explain these conditions to homebuyers prior to executing the LURA.

Currently, the target AMI for homebuyers in the programs range from 50%-70% AMI, where the historical average is 60% AMI. For example, a family of four earning 60% AMI has an annual income that is approximately \$49,440 per year. Using a Mortgage Income Calculator, this income level could result in the purchase of a \$330,000 home with \$100,000 down payment assistance (CDD & partner organization), with standard mortgage terms, current rates, and no more than 30 percent of income for principal, interest, property taxes, and insurance.

Home purchase values for homebuyer programs in PY2022 will most likely range from \$275,000 to \$375,000. These price points allow for a reasonable range of homebuyers that could span the 50% - 80% AMI income tiers.

Overall, the flexibility of CDD's homebuyer programs are based on the ability to:

- Allocate a variable subsidy through underwriting, to be right-sized for an original sale or resale, and to ensure an affordable mortgage payment
- The ability to target various income/AMI tiers within the 50%-80% range
- Utilizing a local market survey to set a maximum HOME purchase value to consider a range of single-family properties

One question HUD asks CDD is, what happens when eligible improvements considerably raise the fair market value and resale price of the home? (For example, if the current owner is in the typical 50%-70% AMI income range.) The response includes the consideration of an applicant in the 70-80% AMI income tier, the ability to provide additional subsidy, and latitude of maximum purchase price provided from the local market survey. Further, as stated in the introduction, under program guidelines the owner must cooperate with the subrecipient to establish a sales price for the property that is affordable to a prospective low- to moderate-income homebuyer making no more than 80% of the area median income.

What does affordability look like at the highest range of the maximum purchase values? For households earning up to 80% AMI, and considering a \$380,000 home?

Based on a Mortgage Income Calculator, a \$380,000 home with \$100,000 down payment assistance (\$40k CDD & \$60k partner organization), with standard terms, current rates, and no more than 30 percent of income for principal, interest, property taxes, and insurance; a household would need to earn approximately \$60,000 - \$65,000 a year to qualify for a conventional loan. These income ranges are consistent with the local HUD 2021 HOME Income Limit maximums for a household size of 3-4 persons earning up to 80% Area Median Income (AMI) \$59,350 and \$65,900, respectively.

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

The Community Development Division (CDD) ensures that the partnering homebuyer organization and the individual homebuyers are required to comply with a designated period of affordability. Within the HOME Agreement that CDD executes with the homebuyer organization, an Affordability

Requirement stipulation dictates the period of time that the housing units must remain affordable. The table below specifies the number of years based on the assistance received, either five, ten, or fifteen years. In the case of newly constructed housing, the default requirement is twenty years.

The HOME affordability period is similarly enforced through the homebuyer organization by a Land Use Restriction Agreement (LURA), a restrictive covenant that is recorded with the Deed of Trust at the County Recorder’s Office. The LURA maintains its position as a restrictive covenant when the partnering homebuyer organization qualifies an eligible homebuyer household for the residence.

Homeownership assistance HOME amount per-unit	Minimum period of affordability in years
Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000	15
New construction or acquisition of newly constructed housing	20

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

Not applicable.

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

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

See attached ESG Written Standards in the appendix or on the [Division’s website](#).

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

The CoC established a centralized coordinated assessment system that meets HUD requirements. Currently, they operate a Coordinated Entry System for clients who meet the definition of literally homeless. The process is as follows:

- Client entry begins with the subrecipient service provider
- Providers administer the Housing Survey (VI-SPDAT is the common assessment tool)
- Survey data entered into HMIS and vulnerability score is generated
- Case conferencing is scheduled weekly (if a housing resource is available)
- Client lists pulled from HMIS based upon available housing resources (Different vulnerability scores are tied to different levels of housing resources. Housing resources

are submitted by providers with the resource along with the eligibility for the specific resource.)

- Client is matched with appropriate available resource
- Client is located and further eligibility for available resource is verified by the subrecipient agency
- If client remains eligible for resource, client referred to housing resource

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

CDD consults with the PPCoC to determine priorities. In 2022, ESG will be allocated as follows:

- Emergency Shelter Operations and Street Outreach: No more than 60% of the entitlement award will be allocated for emergency shelter operations and street outreach combined. CDD continues to conduct an open and competitive process for funding. Respondents are currently being evaluated based on consistency with the Written Standards for ESG assistance and the PPCoC Strategic Plan, past performance, and planned outcomes.
- Homeless Management Information Systems (HMIS): HMIS funds will be directly allocated to Community Health Partnership, the HMIS administrator and sole source manager of the PPCoC HMIS, as designated by the PPCoC Governing Board.
- Rapid Rehousing/Homelessness Prevention: The balance of funds will be allocated for Rapid Rehousing and/or Homelessness Prevention activities. CDD will conduct an open and competitive process for funding. Respondents will be evaluated based on consistency with the Written Standards for ESG assistance, PPCoC Strategic Plan, and past performance. ESG subrecipients are required to coordinate with the Continuum of Care and to participate in HMIS.

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

- CDD consults with the Pikes Peak Continuum of Care when considering policies and funding decisions regarding facilities and services funded under ESG or other funding sources targeting people experiencing homelessness.
- The City's Homelessness Prevention and Response Coordinator Staff is a trained social worker and works with sheltered and unsheltered people experiencing homelessness on a regular basis in making referrals, creating programs with other agencies, and providing information and resources. This relationship makes the perspective of lived experience always present in ESG administrative decisions at all levels.
- Staff from the PPCoC administrator organization will serve on the ESG application review committee. Division staff will also make efforts to find individuals with lived experience to

serve on the external review committee.

5. Describe performance standards for evaluating ESG.

The Written Standards were adopted by the City and CoC in early 2017. The PPCoC has adopted their own Written Standards to include elements funded with CoC funds from HUD. The Division's priority has been to work with the CoC to monitor performance metrics and evaluate outcomes across all funding sources/agencies. The performance measures identified for all ESG subrecipients are:

1. Housing stability: How many households obtain and maintain permanent housing?
2. Income, both total and earned: How many households see a rise in income due to access to benefits and employment?
3. Shelter only: Number of clients in case management
4. Outreach only: Number of contacts between staff and unsheltered people
5. Outreach only: Number of shelter referrals

N/A

Attachments

DRAFT