

RESOLUTION NO. 80-20

A RESOLUTION APPROVING A SUBSTANTIAL
AMENDMENT TO THE 2020-2024 CONSOLIDATED PLAN,
2020 ANNUAL ACTION PLAN, AND CITIZEN
PARTICIPATION PLAN FOR SUBMITTAL TO THE U.S.
DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT

WHEREAS, the City of Colorado Springs ("City") is an entitlement community and receives an annual allocation of federal block grant funds from the US Department of Housing and Urban Development ("HUD") under the Community Development Block Grant Program ("CDBG"), Home Investment Partnerships Program ("HOME") and Emergency Solutions Grant ("ESG"); and

WHEREAS, as a result of the CARES Act passed by Congress on March 27, 2020, the City received an additional allocation of federal block grant funds from HUD under the CDBG and ESG programs; and

WHEREAS, the purpose of the additional allocation of federal block grant funds through the CARES Act is to help low and moderate income residents in the City of Colorado Springs prevent, prepare for, and respond to the coronavirus; and

WHEREAS, as an entitlement community, the City is required by HUD to prepare a five-year Consolidated Plan and annual action plan to report all funding sources and their anticipated uses; and

WHEREAS, as an entitlement community, the City is required by HUD to follow its adopted Citizen Participation Plan that sets forth the City's policies and procedures for public participation; and

WHEREAS, HUD has provided regulatory waivers to allow for shortened comment periods and ways to engage the public that follow current public health guidelines; and

WHEREAS, City staff has met the requirements set forth in its updated Citizen Participation Plan for proposing and adopting a substantial amendment of the 2020-2024 Consolidated Plan;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF COLORADO SPRINGS:


Section 1. The City of Colorado Springs approves the proposed substantial amendment to the 2020-2024 Consolidated Plan, 2020 Annual Action Plan, and Citizen Participation Plan for submittal to the U.S. Department of Housing and Urban Development.

Dated at Colorado Springs, Colorado this 22nd day of September 2020.



Council President

ATTEST:


Sarah B. Johnson, City Clerk



2020-2024 Consolidated Plan

Amendment 1: Submitted to HUD and approved October 2020

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Executive Summary

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

1. Introduction

The City of Colorado Springs, through the Community Development Division (CDD), is the lead agency responsible for preparing the Consolidated Plan and for administration of the CDBG, HOME and ESG programs. Funding for programs comes from the US Department of Housing and Urban Development (HUD). The Consolidated Plan details how the City plans to invest its resources to meet its ongoing affordable housing, community development, and public service needs during the five-year period. The City plans to provide decent and affordable housing, a suitable living environment, 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 and persons with a disability. The City does this in a variety of ways that include partnerships with public and private funders, both federal and local, as well as partnerships with corporations, nonprofits, and public institutions.

The City of Colorado Springs is located in the east central part of Colorado about 70 miles south of Denver. As of 2018, the City has a population of 473,000. The City has been experiencing a steady population increase for the last several decades and saw a 31% increase from 2000 to 2018 (360,798 to 473,000). The following Consolidated Plan will help assist the City’s Community Development Division to identify the priority needs of its citizens and develop goals to address these needs.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Like many communities across the state of Colorado, affordability is by far the largest housing problem in Colorado Springs. As will be discussed in the Needs Assessment of this plan, housing cost burden is a big issue for many families and households in the community, especially for low- and moderate-income households.

The City of Colorado Springs has developed its strategic plan based on an analysis of the data presented in this plan and the community participation and stakeholder consultation process. Through these efforts, the City has identified five (5) priority needs and associated goals to address those needs. 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

3. Evaluation of past performance

Working with public, private, and non-profit community housing providers and non-housing service agencies, the City of Colorado Springs has made significant contributions to provide safe, decent and affordable housing, a suitable living environment, and economic opportunities, especially for low- to moderate-income (LMI) individuals in the community. The City's programs have fulfilled the spirit and intent of the federal legislation creating these programs. The following is a summary of Colorado Spring's past performance as reported to HUD in the FY2018 Consolidated Annual Performance and Evaluation Report (CAPER), the most recent report filed:

Homelessness

- CDD supported local low-barrier shelters using General Fund dollars paired with ESG Emergency Shelter and CDBG Public Facility funds, reaching 99% of its projected beneficiaries. Subrecipient 'The Place,' formerly Urban Peak Colorado Springs, had a wide-reaching street outreach program for homeless youth (585 people served).
- The City's coordination with the Colorado Springs Housing Authority and family service providers (Partners in Housing) enabled 34 families to exit homelessness through the TBRA (NOME) program and 17 families, including 31 children, exit homelessness through the Rapid Rehousing (ESG) program.
- Homeless Prevention remains a challenging program to reach our 5-year goal of 250 beneficiaries due to the high level of staff capacity it requires. With the limited ESG funds available and current community focus on populations who are already homeless, it is difficult to fund multiple providers to identify and support large numbers of people at risk of homelessness. Nevertheless, it is a high impact program and the Division will keep working with CoC members every year to help build community capacity for preventative services.

Housing

- The Division outsourced the owner-occupied housing rehab program to a local housing non-profit. They were able to assist 67% of the projected number of extremely low-income homeowners from the 2018 AAP.
- Traditions, 180 units of apartments for low-income seniors, opened and will be leased up by late summer 2019, helping us meet our goal of projected new units.
- Greenway Flats, 65 new rental units for people exiting homeless, is wrapping up construction and will lease up in 2019.
- Planned apartment rehab projects fell behind schedule in 2018, but the conversion of an unused commercial building into the Rocky Mountain Apartments is scheduled for completion and lease-up in Spring, 2020.

Neighborhoods

- The Division continues to fund public service providers that serve low-income families throughout the city, providing much needed support to stay housed. We met 99% of our annual goal and have long surpassed our five-year goal.
- The Division worked with the Planning Department on completing and getting Council approval on a neighborhood plan for a very low-income downtown neighborhood.
- Our Commercial Frontage and Facade Improvement Grant (CFFIG) program was unveiled and funds were awarded to two business owners in 2018. Construction is not yet complete.

4. Summary of citizen participation process and consultation process

The Citizen Participation Plan (CPP) 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. 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). The City's CPP was last updated in 2019 and has been widely distributed throughout the city, particularly in areas where LMI people reside or seek services such as community and senior centers.

Citizen Participation Outreach

The Community Development Division (CDD) conducted advertised community meetings to obtain feedback and solicit input into the needs of the community, this Consolidated Plan and first (2020) AAP. The meetings included an introduction and explanation of the 2020-2024 Consolidated Plan, 2020 AAP purpose and the process and schedule for its completion. CDD also consulted with a variety of non-profits, social service providers, community residents, and governmental agencies to determine the needs of Colorado Springs residents and better allocate entitlement resources.

The CDD released a housing market experience survey in May 2019, and got over 3,400 respondents, 4% of whom were residents experiencing homelessness. It has also incorporated findings of several other plans with ample public participation foundations. Over the last couple of years, the City has organized and partnered with multiple public planning processes, most notably PlanCOS, the new comprehensive plan approved by City Council in January 2019. This public input informed much of the housing and non-housing needs for the Consolidated Plan.

CDD conducted three public hearings in December 2019 to get input on the Strategic Plan priorities and on housing assistance and Fair Housing education methods. Public notice was published in the paper of record, *The Gazette*, on November 15, 2019, in the *Colorado Springs Independent* (weekly paper) on December 4 and sent out in English and Spanish to over 300 community partners and residents through Community Development's email list.

A draft of the Consolidated Plan was been made available for public review and comment from Jan 1 through Jan 31, 2020. Notice of the availability of the draft plans and the opportunity to comment on them was advertised in the *Gazette on December 14, 2019*, by email and website; copies were distributed to Community Centers, Library, City Hall and City Administration Building. A second public hearing will be conducted on January 22, 2020, in the Pikes Peak Room of City Hall, to present the plans.

See PR-15 Citizen Participation for more details about the citizen participation process and efforts undertaken by the City.

5. Summary of public comments

A summary of comments can be found in PR-15 Citizen Participation and in the Public Engagement Appendix. All comments were accepted by the City's CDD.

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

Primary data sources for the Consolidated Plan include: 2000 Census, 2013-2017 & 2014-2018 American Community Survey (ACS) 5-Year Estimates, 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) data, Longitudinal Employer-Household Dynamics (LEHD), Homeless Management Information System (HMIS), Inventory Management System/PIH Information Center (PIC), the Bureau of Labor Statistics (BLS), Pikes Peak Association of Realtors, Colorado Springs Metro Area Apartment Vacancy and Rent Study, HUD Income Limits, HUD Fair Market Rents and HOME Rent Limits and other local data sources. For more information about the above data sources, please see the appendix.

A disparity exists between data tables throughout the plan. Tables which utilize ACS contain 2013- 2017 data and tables that utilize CHAS contain 2015 data. CHAS is a dataset unique to HUD and is not updated as often as ACS, however, the CHAS dataset is required for certain portions of the Consolidated Plan. Whenever possible, CDD has used the most comprehensive data available and reconciled data points across the maps and tables.

The default data provided by HUD for the Consolidated Plan is from the 2011-2015 American Community Survey (ACS). This satisfies HUDs requirement for the data as its purpose is to provide a picture of the conditions and trends within the city, however where possible data was replaced with the most up to date 2013-2017 and 2014-2018 ACS. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Data for large groups, such as the total population, have a relatively low and acceptable margin of error. However, small subpopulations may have a large margin of error which renders the information less reliable. In these cases, it is important to view the situation through a broad lens and use supplementary data sources when available. Please refer to the American FactFinder website <https://factfinder.census.gov/> for more about MOE.

Proof of citizen participation is attached as an appendix. A summary of comments from the public and citizen participation efforts made by the City to gather feedback for the Consolidated Plan can be found in PR-10 Consultation and PR-15 Citizen Participation.

The Process

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
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

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

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(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 a large cross-section of stakeholders. This outreach effort included public meetings, public events, stakeholder meetings, and email correspondence.

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)).

Community Development consulted with a variety of non-profits, social service providers, community residents, and governmental agencies to determine the needs of Colorado Springs residents and better allocate entitlement resources. The objective of this series of interviews, meetings, and public event attendance was to take into account public processes other agencies have already undergone and identify any potential alignment of others’ goals or strategies with those of Community Development’s.

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 has two staff members who sit on the governing board of the Pikes Peak Continuum of Care () in ex officio status. They act as a liaison for City interests and Community Development collaborative efforts. 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 also acts as a convener of regional service providers to help inform the policies, procedures, and funding priorities of public funders such as Community Development.

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

Community Development manages federal ESG funds, while the CoC manages federal CoC and state ESG funds – both entities award these funds competitively to service providers in the region. CDD consults with the to determine its ESG priorities and strategies. The City directs its full 60% cap of entitlement ESG funds for shelter operations and street outreach, to help local low-barrier shelters; as for the remaining 40%, between rapid rehousing, homeless prevention, and HMIS, HMIS support remains a regional priority

and homeless prevention is a service not funded by the CoC and is valued in the community. For 2020, the board members recommended prioritizing prevention over rapid rehousing, a program that is funded by the CoC through state and federal grants.

The Division and they will undergo a review and revision of the Written Standards in the coming year (2020).

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	EL PASO COUNTY
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	October 3 - Public health needs and current data assessment goals.
2	Agency/Group/Organization	COLORADO SPRINGS HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meeting on September 16 - Discussed Section 504 compliance needs
3	Agency/Group/Organization	Pikes Peak CoC
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meeting with CHP staff Sept 13 to discuss Written Standards. Board meeting October 25, 11:30-1 to discuss funding priorities
4	Agency/Group/Organization	City of Colorado Springs Economic Development
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Focus: Small business development in key growth areas Southeast Colorado Springs main focus - but more resources for assistance needed
5	Agency/Group/Organization	City of Colorado Springs Stormwater
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	September 24 - Discussion of Stormwater community education program through public art
6	Agency/Group/Organization	City of Colorado Springs Planning
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	September 30 - Discussed land use chapter rewrite and amendments to affirmatively further fair housing
7	Agency/Group/Organization	City of Colorado Springs Title II
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	September 24 - Discussed who certifies ADA compliance on different types of project; facility accessibility assessment progress
8	Agency/Group/Organization	City of Colorado Springs Homelessness Prevention and Response
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	October 11 - Reviewed progress of Homelessness Initiative and plans for 2020
9	Agency/Group/Organization	City of Colorado Springs Parks Recreation and Cultural Services
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	November 18 (email) - Neighborhood parks and amenities higher priority than open space in LMI areas
10	Agency/Group/Organization	Council of Neighbors and Organizations
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	October 9 - Community Investment Trust stakeholder meeting. Exploration of a community-centered economic development tool for Southeast Colorado Springs.
11	Agency/Group/Organization	Colorado Springs School District 11
	Agency/Group/Organization Type	Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meeting Sept 12, with Title I staff to discuss needs of homeless students and their families
12	Agency/Group/Organization	Pikes Peak Library District
	Agency/Group/Organization Type	Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Requested meeting about regional broadband - meeting TBD
13	Agency/Group/Organization	Human Relations Commission
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meeting October 15 - Council advisory commission to champion mental health and education needs in 2020
14	Agency/Group/Organization	Pikes Peak Area Council of Governments Area Agency on Aging
	Agency/Group/Organization Type	Services-Elderly Persons Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Nov 8 - Discussed senior housing needs and upcoming program models addressing health, housing, transit, and household income sources
15	Agency/Group/Organization	Colorado Springs Health Foundation
	Agency/Group/Organization Type	Foundation
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	November 18 (email) - Alignment in access to healthcare and healthy built environment.
16	Agency/Group/Organization	Apartment Association of Southern Colorado
	Agency/Group/Organization Type	Business Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Coordination between public and private housing

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	November 18 - Discussed AASC fair housing efforts and ways to collaborate
17	Agency/Group/Organization	Colorado Springs Senior Center
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	November 18 (email) - Social supports for seniors; senior transport options; developing traveling community center model.
18	Agency/Group/Organization	Alliance for Kids El Paso County Early Childhood Council
	Agency/Group/Organization Type	Regional organization Child welfare agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Dec 11 - Discussed family survey tool; childcare service gaps; licensing opportunities; potential for neighborhood childcare facilities

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

CDD staff did not engage with any Community Development Financial Institutions in the Fall of 2019 in preparation for the Consolidated 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 we listen to and consider their feedback indirectly through our close collaborations with our 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. 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?
Continuum of Care 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 2019 Affordable Housing	City of Colorado Springs	Ongoing planning effort targets strategies to ease housing development for the low- and very low-income groups
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.
Colorado Springs AI	City of Colorado Springs	Strategies to combat concentrations of poverty and economic and racial segregation.
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.
El Paso County Community Health Improvement Plan	El Paso County	Decrease substance abuse and improve healthy eating and active living.
2GO: Alliance for Kids	Alliance for Kids	What will empower families to overcome barriers related to family stability? Qualitative data from focus groups and interviews analyzed for common themes. Childcare, parenting skills, financial assistance and building social capital major needs.
2018 CAPER and 2019 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	This report, Affordable and Accessible Housing Needs and Barriers: Community Voices in the Pikes Peak Region, 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.

Table 3 – Other local / regional / federal planning efforts

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

In accordance with 24 CFR 91.100(4), the City of Colorado Springs will notify adjacent units of local government of the non-housing community development needs included in its Consolidated Plan. The City will continue to interact with public entities at all levels throughout the program year to ensure coordination and cooperation in the implementation of the Consolidated Plan and thereby maximize the benefits of the City’s housing and community development activities for the residents being served.

Narrative (optional):

CDD consulted with a variety of non-profits, social service providers, community residents, and governmental agencies to determine the needs of the City and better allocate entitlement resources. Staff held a number of meetings and interviews; in order to cast a wider net and hear from more organizations and perspectives, staff also sent invitations for consultations in the form written responses to key themes from the Housing Market Analysis and Needs Assessment – those organizations invited to respond include: Mountain Metro Transit; Springs Rescue Mission; Habitat for Humanity; Partners in Housing; Pikes Peak Library District (for broadband needs discussion); Salvation Army; Family Promise; Silver Key; Rocky Mountain Human Services; Colorado Legal Services; Energy Resource Center; Solid Rock Church/Community Development Corporation; El Paso County Workforce Development Center; Rocky Mountain Community Land Trust; University of Colorado at Colorado Springs; Pikes Peak Community College; Colorado Springs Utilities; City of Colorado Springs Real Estate Services, Public Works, City Council and Traffic.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

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/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).

The City's CPP was last updated in 2019 and has been widely distributed throughout the city, particularly in areas where LMI people reside or seek services such as community and senior centers. 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 advertised community meetings to obtain feedback and solicit input into the needs of the community and this Consolidated Plan and first (2020) AAP. The meetings included an introduction and explanation of the 2020-2024 Consolidated Plan and 2020 AAP purpose and the process and schedule for its completion. The presentation included digital engagement opportunities via text polling as well as an opportunity for open dialogue for questions and comments.

The CDD has been collecting public input since May 2019 when it released a housing market experience survey. This survey got over 3,400 respondents, 4% of whom were residents experiencing homelessness. However, it has also incorporated findings of several other plans with ample public participation foundations. Over the last couple of years, the City has organized and partnered with multiple public planning processes, most notably PlanCOS, the new comprehensive plan approved by Council in January 2019. This process included 53 stakeholder interviews, 274 outreach meetings, 9,000 participants, 5,146 survey responses, and over 24,500 social media posts and shares. This public input informed much of the housing and non-housing needs for the Consolidated Plan, as well, given what residents envision for their neighborhoods, city centers, employment opportunities and transportation needs.

CDD conducted three public hearings on December 2019 to get input on the Strategic Plan priorities and on housing assistance and Fair Housing education methods. Citizens are invited to send in comments by email via the website. Public notice was published in the paper of record The Gazette on November 15, 2019, in the Colorado Springs Independent (weekly paper) on December 4, and sent out in English and Spanish to over 300 community partners and residents through Community Development’s email list.

A draft of the Consolidated Plan has been made available for public review and comment from Jan 1 through Jan 31, 2020. Notice of the availability of the draft plans and the opportunity to comment on them was advertised in the *Gazette on December 14, 2019*, by email and website; copies will be distributed to Community Centers, Library, City Hall and City Administration Building.

A second public hearing will be conducted on January 22, 2020, in the Pikes Peak Room of City Hall, to present the plans. The following comments were received during the 30-day comment period and second public hearing. A CDD response follows each comment.

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)
1	Survey	Non-targeted/broad community	3,400+ responses	Respondents shed light on difficulties in searching for housing in Colorado Springs market	Substantially incomplete survey responses not recorded	https://coloradosprings.gov/affordablehousingplan

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)
2	Public Hearing	Non-targeted/broad community	The Community Development Division held a hearing on Tuesday, December 3, 2019 from 4:30PM to 6:00PM at the Independence Center located at 729 S. Tejon St. to inform the public about the community development efforts in the plan and gather feedback on the plan.	All members of the public were welcome.	All comments from the public were welcome.	https://coloradosprings.gov/community-development/article/news/city-seeks-public-input-community

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Hearing	Non-targeted/broad community	The Community Development Division held a hearing on Thursday, December 5, 2019 from 6:00PM to 7:00PM at the City Administrative Building located at 30 S. Nevada Ave. to inform the public about the community development efforts in the plan and gather feedback on the plan.	All members of the public were welcome.	All comments from the public were welcome.	https://coloradosprings.gov/community-development/article/news/city-seeks-public-input-community

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)
4	Public Hearing	Non-targeted/broad community	The Community Development Division held a hearing on Friday, December 6, 2019 from 2:00PM to 3:30PM at the Colorado Springs Senior Center located at 1514 N. Hancock Ave. to inform the public about the community development efforts in the plan and gather feedback on the plan.	All members of the public were welcome.	All comments from the public were welcome.	https://coloradosprings.gov/community-development/article/news/city-seeks-public-input-community

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)
5	Public Hearing	Non-targeted/broad community	The Community Development Division held a hearing on January 22, from 5:30 to 6:30PM at Colorado Springs City Hall located at 107 N. Nevada Ave. to inform the public about the community development efforts in the plan and get comments on the contents	All members of the public were welcome.	All comments from the public were welcome.	https://coloradosprings.gov/community-development/article/public-notice/public-hearing-2020-2024

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

This section assesses the housing needs in the City of Colorado Springs by analyzing various demographic and economic indicators. In order to develop a picture of the current needs in the community you must begin by looking at broad trends in population, area median income, the number of households, and other indicators. The next step is intersecting those data points with a more nuanced analysis of variables such as family and household dynamics, race, and housing problems.

A related goal of the Needs Assessment is to determine the non-housing needs observable by quantitative and qualitative local data. These factors include homelessness, mental health, public health, infrastructure, and organizational capacity of service providers in the Colorado Springs area.

The key goal of the Needs Assessment is to identify the nature and prevalence of housing problems experienced by the City's citizens. The main housing problems assessed are: (a) cost-burdened households; (b) substandard housing; and (c) overcrowding. Furthermore, these housing problems are juxtaposed with economic and demographic indicators to discern if certain groups carry a disproportionate burden. For example, are African Americans more cost-burdened than other racial groups? Do low-income households experience higher levels of overcrowding? Do large families have more housing problems than small families? These sorts of questions are empirically answered through data analysis. Understanding the magnitude and incidence of housing problems in the community is crucial in aiding the City in setting evidence-based priorities for the use of the available funds.

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

Summary of Housing Needs

On the surface, determining the housing needs of a community is simply a matter of supply and demand. However, determining how different factors impact supply and demand is a more difficult task. One key factor is population change; as populations grow there is greater demand for homes, which will drive up costs if new construction doesn't keep pace. Colorado Springs experienced a population growth of 25% between 2000 and 2017 with the population climbing from 360,798 to 450,000. The number of households in the City increased by a similar amount, 24%, from 141,757 households to 176,026. Over the same time period the Median Household Income increased by 29% from \$45,081 to \$58,158.

The Poverty Rate in Colorado Springs is 12.78%, which is approximately 2% less than the national rate. However, the poverty rate varies significantly by race and ethnicity, an issue that will be discussed in detail later in the report. Like many communities across the country, rising housing costs are increasing the number of households that are cost-burdened (paying 30% or more of their income to housing costs). Overall, homeowners fare better than renters but there is a significant number of both groups who need financial relief. Approximately 23% of homeowners and 50% of renters are cost burdened. Achieving stability is key and is the goal of programs funded by the Division, such as ESG Rapid Rehousing, HOME TBRA, and CDBG Public Services housing stability programs. These programs help people just exiting homelessness to those who may have never been homeless, but experience extreme cost burdens. When rental assistance limits run out, we ask all service providers in the application phase to collaborate with other local providers and connect beneficiaries to other resources, whether or not they are funded by HOME or CDBG dollars.

The data indicate that the region is experiencing significant growth. However, this growth exacerbates the housing barriers experienced by low income families throughout the region. While an increase in the median income is an overall positive indicator of economic growth, when the price of housing increases faster than incomes, as shown in the Housing Market Analysis, households are actually financially secure than they were in the past. This growth gap creates a distinct pressure point within the regional housing market making housing less affordable.

The chart below highlights demographic changes in population, number of households, and income between 2000 and 2017 for the City. The median income may have nominally increased by 29% between 2000 and 2017, but if we calculate the value of the base year median income in 2017 dollars, the median income in 2000 is \$65,570, an almost 13% decrease in purchase power (Bureau of Labor Statistics Consumer Price Index calculator, <https://data.bls.gov/cgi-bin/cpicalc.pl>)

Demographics	Base Year: 2000	Most Recent Year: 2017	% Change
Population	360,798	450,000	25%
Households	141,757	176,026	24%
Median Income	\$45,081.00	\$58,158.00	29%

Table 5 - Housing Needs Assessment Demographics

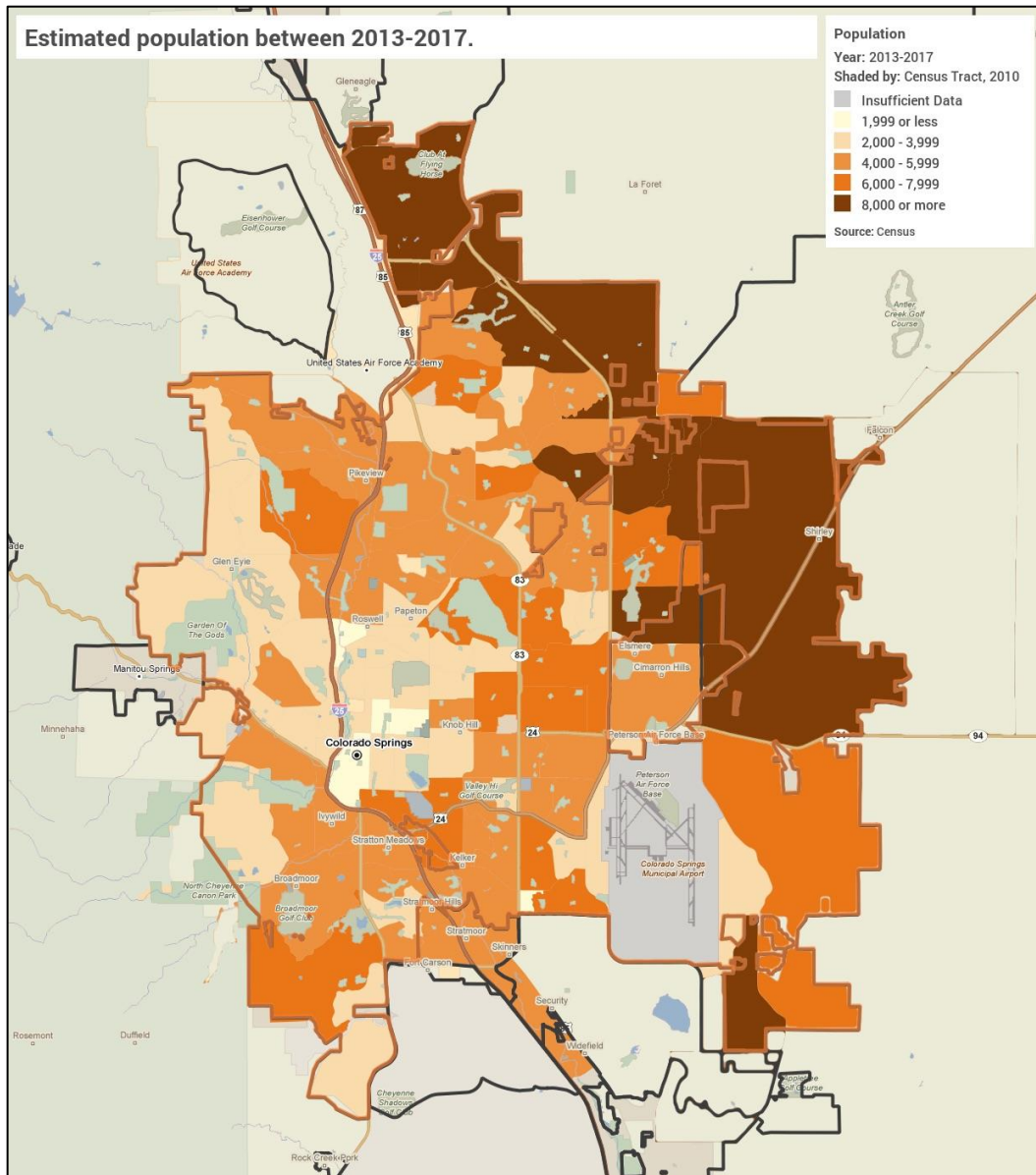
Alternate Data Source Name:
2000 Census, 2013-2017 ACS

The following maps display the geographic distribution of demographic trends in the City across a few key indicators including population change, median household income, and poverty.

Population

Census tracts throughout Colorado Springs have an uneven population distribution. During each decennial census the US Census bureau redraws the census tract lines with the goal of having a similar number of people in each tract. The heavy concentration of residents in the outer tracts shows that those areas have seen significant population growth since 2010. The optimum size of a census tract is 4,000 people, meaning that many tracts are more than twice the optimal size in the outer areas and half the optimum size in the downtown area. It is likely that during the 2020 Census the geographic boundaries for tracts in Colorado Springs will change significantly.

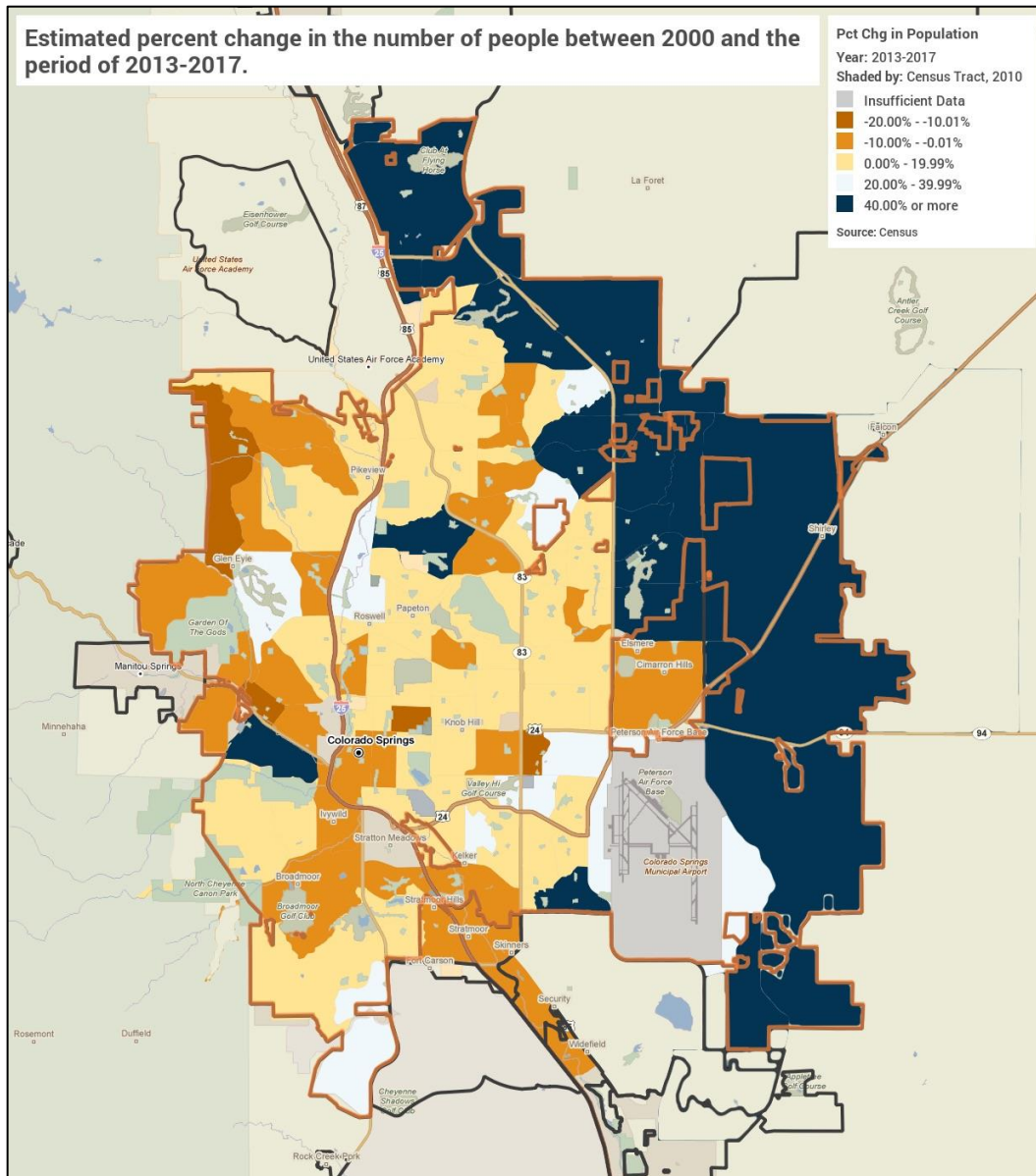
Source: 2013-2017 American Community Survey 5-Year Estimates



Change in Population

The map below displays the population change throughout the jurisdiction since 2000. The City grew by 25% since then but that growth is not evenly distributed throughout the area. Dark and medium orange colored census tracts had a reduction in population while light orange and blue colored census tracts had an increase in population. The pattern shown on this map is very similar to the previous one; growth appears to be happening along the eastern edge of the City while tracts downtown and to the east saw significantly slower growth or a population decrease.

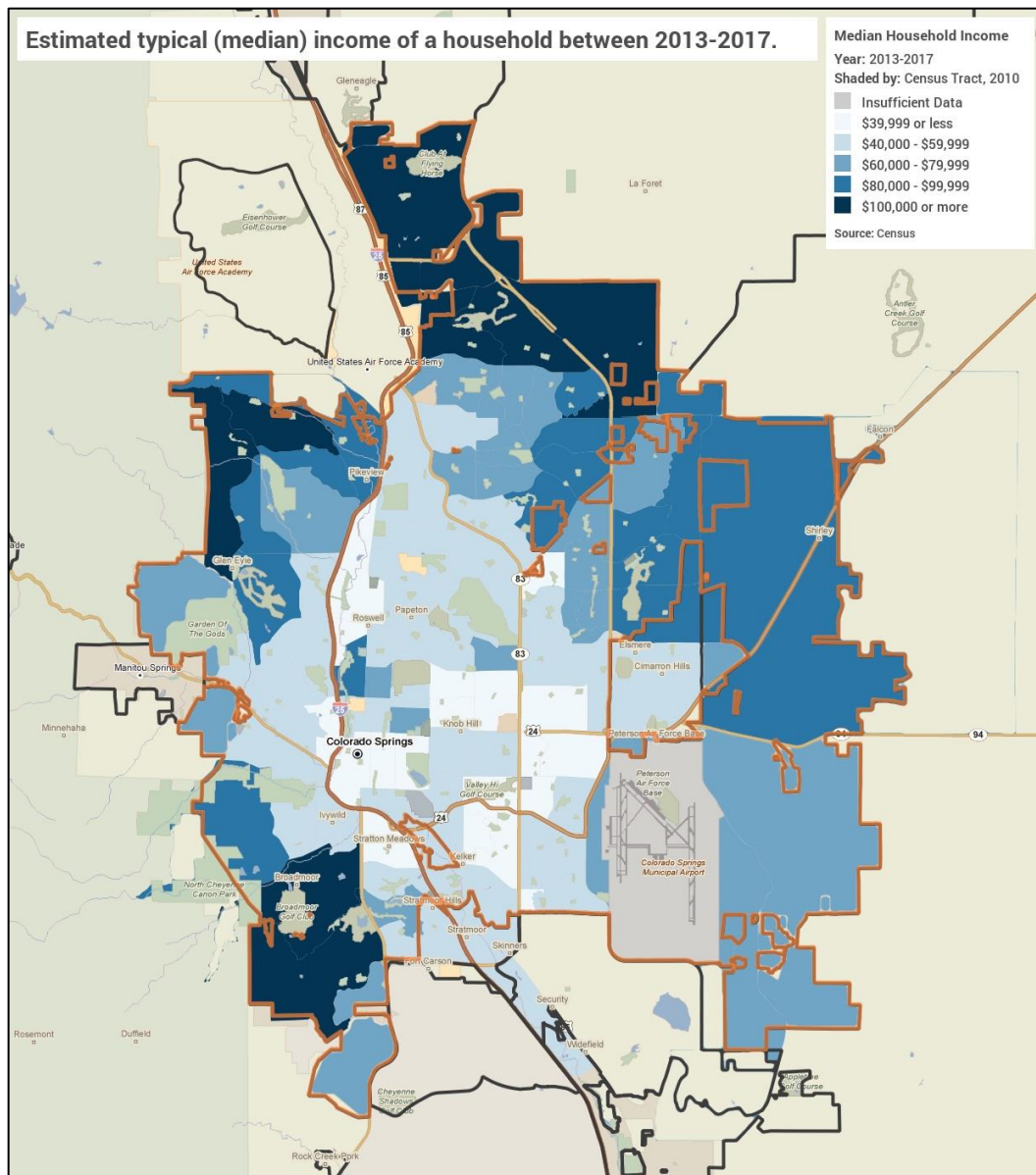
Source: 2013-2017 American Community Survey 5-Year Estimates



Median Household Income

The map below displays the median household income by census tract throughout the jurisdiction. In 2017, the median household income was \$58,158 but the income varied considerably throughout the City. Colorado Springs shows a pattern of income distribution that is common in urban areas throughout the United States. Households with higher incomes are living on the outskirts of the City in suburban areas while those with lower incomes are more common in downtown areas.

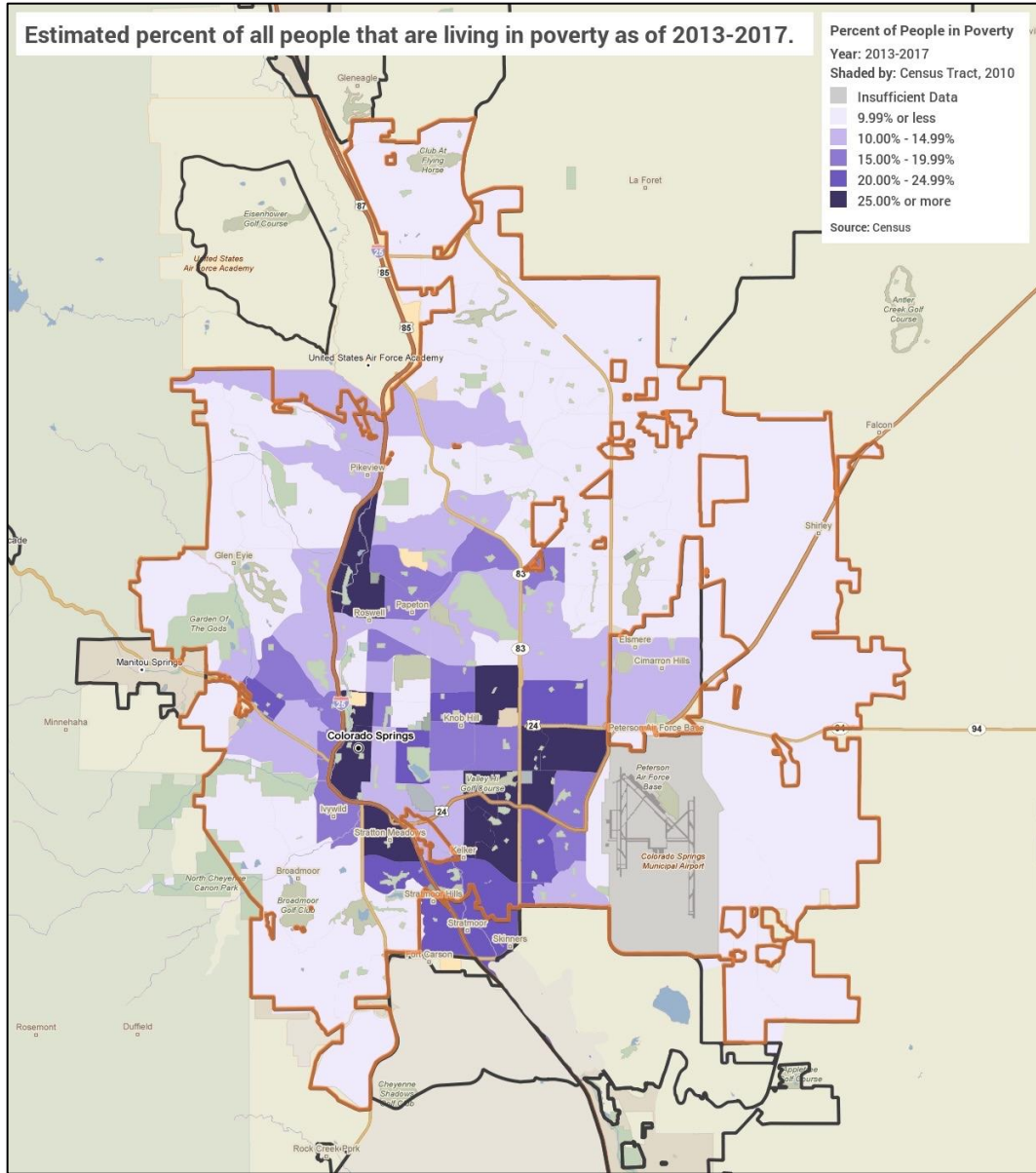
Source: 2013-2017 American Community Survey 5-Year Estimates



Poverty

The map below displays the percentage of the population who live below the poverty level by census tract. Unsurprisingly, this map is a near inverse of the previous one. Downtown tracts with lower median household incomes also have higher rates of poverty. In many cases over 25% of the population lives in poverty within the tract.

Source: 2013-2017 American Community Survey 5-Year Estimates



Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	22,250	22,710	32,575	19,130	77,780
Small Family Households	6,940	8,195	12,605	8,215	41,940
Large Family Households	1,665	1,405	2,415	1,375	6,020
Household contains at least one person 62-74 years of age	3,700	3,495	5,245	3,790	15,230
Household contains at least one-person age 75 or older	2,449	3,025	3,175	1,760	5,060
Households with one or more children 6 years old or younger	4,410	4,545	6,120	3,120	10,830

Table 6 - Total Households Table

Alternate Data Source Name:
2011-2015 CHAS

Number Households

The above table breaks down family dynamics and income in the jurisdiction using 2015 CHAS data. Small families are much more prevalent than large families, which follows the trend of smaller average household size in the region and the nation as a whole. When looking at households in the City by income level, there are a significant number of households in the City which are extremely low-income (0-30% HAMFI), with over 22,000 households. Over 25% of these extremely low-income households are elderly and nearly 20% have one or more children 6 years old or younger.

HAMFI or HUD Area Median Family Income, is the median family income calculated by HUD for each jurisdiction, in order to determine Fair Market Rents (FMRs) and income limits for HUD programs.

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	350	225	165	130	870	110	30	35	10	185
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	515	330	405	100	1,350	40	35	60	15	150
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	745	690	750	295	2,480	120	190	75	60	445
Housing cost burden greater than 50% of income (and none of the above problems)	10,225	3,510	745	185	14,665	3,735	2,850	1,480	365	8,430
Housing cost burden greater than 30% of income (and none of the above problems)	1,365	7,275	6,475	1,000	16,115	1,165	1,755	5,520	2,625	11,065
Zero/negative Income (and none of the above problems)	1,020	0	0	0	1,020	615	0	0	0	615

Table 7 – Housing Problems Table

Alternate Data Source Name:
2011-2015 CHAS

Housing Needs Summary

The table above gives an overview of housing problems in the City in three main categories: substandard housing, overcrowding, and cost burden. Substandard housing looks at functional components essential to health and safety. Overcrowding is defined by 1.01 or more people per room living in a home. Using

2015 CHAS data, it provides the numbers of households experiencing each category of housing problem broken down by income ranges (up to 100% AMI) and owner/renter status. For example, looking at the first data cell (top left) we see that 350 renter households in the jurisdiction made 30% or below the area median income (AMI) and lacked complete plumbing or kitchen facilities.

Cost burden is clearly the biggest housing problem in the region in terms of sheer numbers – a common trend in many communities across the state and nation today. According to the 2015 CHAS data there were over 30,000 renters who spent more than 30% of their income on household expenses, nearly 15,000 of which spent over 50%. Nearly 20,000 homeowners in the 0% to 100% AMI range spent more than 30% of their income on housing costs and 8,430 paid over 50%.

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	13,200	12,025	8,535	1,705	35,465	5,170	4,860	7,175	3,070	20,275
Having none of four housing problems	1,225	2,605	8,765	6,515	19,110	995	3,225	8,100	7,840	20,160
Household has negative income, but none of the other housing problems	1,020	0	0	0	1,020	615	0	0	0	615

Table 8 – Housing Problems 2

Alternate Data Source Name:
2011-2015 CHAS

Severe Housing Problems

The above table shows households with at least one severe housing problem broken out by income and occupancy. The trend in the data is simply the lower the income in a household, the greater presence of severe housing problems.

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	4,890	4,775	3,205	12,870	1,580	1,630	2,955	6,165
Large Related	1,311	610	515	2,436	320	370	645	1,335
Elderly	2,120	1,290	595	4,005	1,800	1,105	825	3,730
Other	5,690	4,770	2,855	13,315	1,470	1,005	1,685	4,160
Total need by income	14,011	11,445	7,170	32,626	5,170	4,110	6,110	15,390

Table 9 – Cost Burden > 30%

Alternate Data Source Name:
2011-2015 CHAS

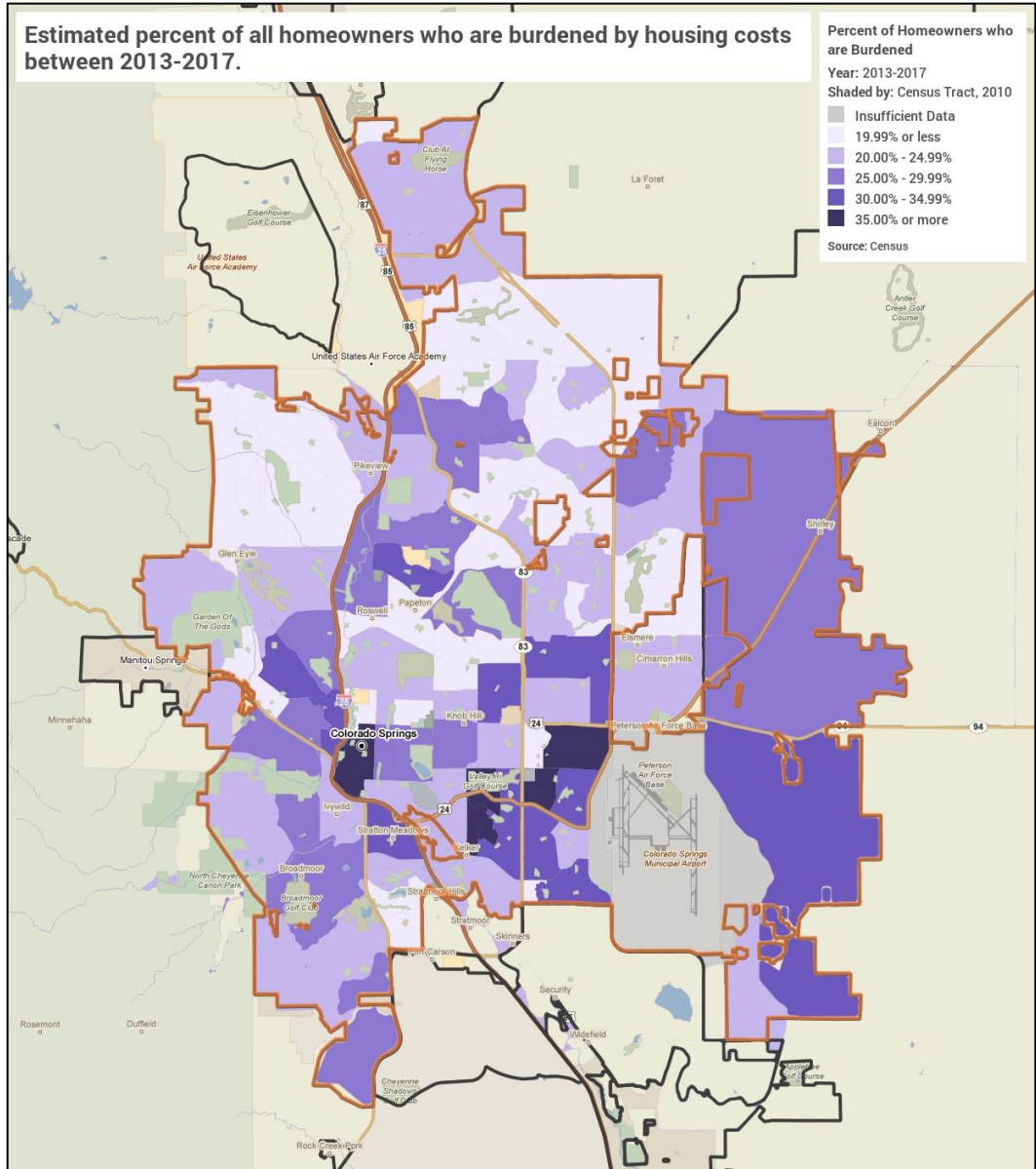
Cost Burden

The table above displays 2015 CHAS data on cost-burdened households in the City for the 0% to 80% AMI cohorts. HUD defines cost-burden as paying more than 30% monthly income on housing costs.

Housing Cost-Burdened

The following maps below display the percentage of the population who are cost-burdened by census tract using data from the 2013-2017 American Community Survey 5-Year Estimates. Despite higher median household incomes in the City there are still high rates of cost burden, sometimes over 35% for homeowners and 60% for renters.

Source: 2013-2017 American Community Survey 5-Year Estimates

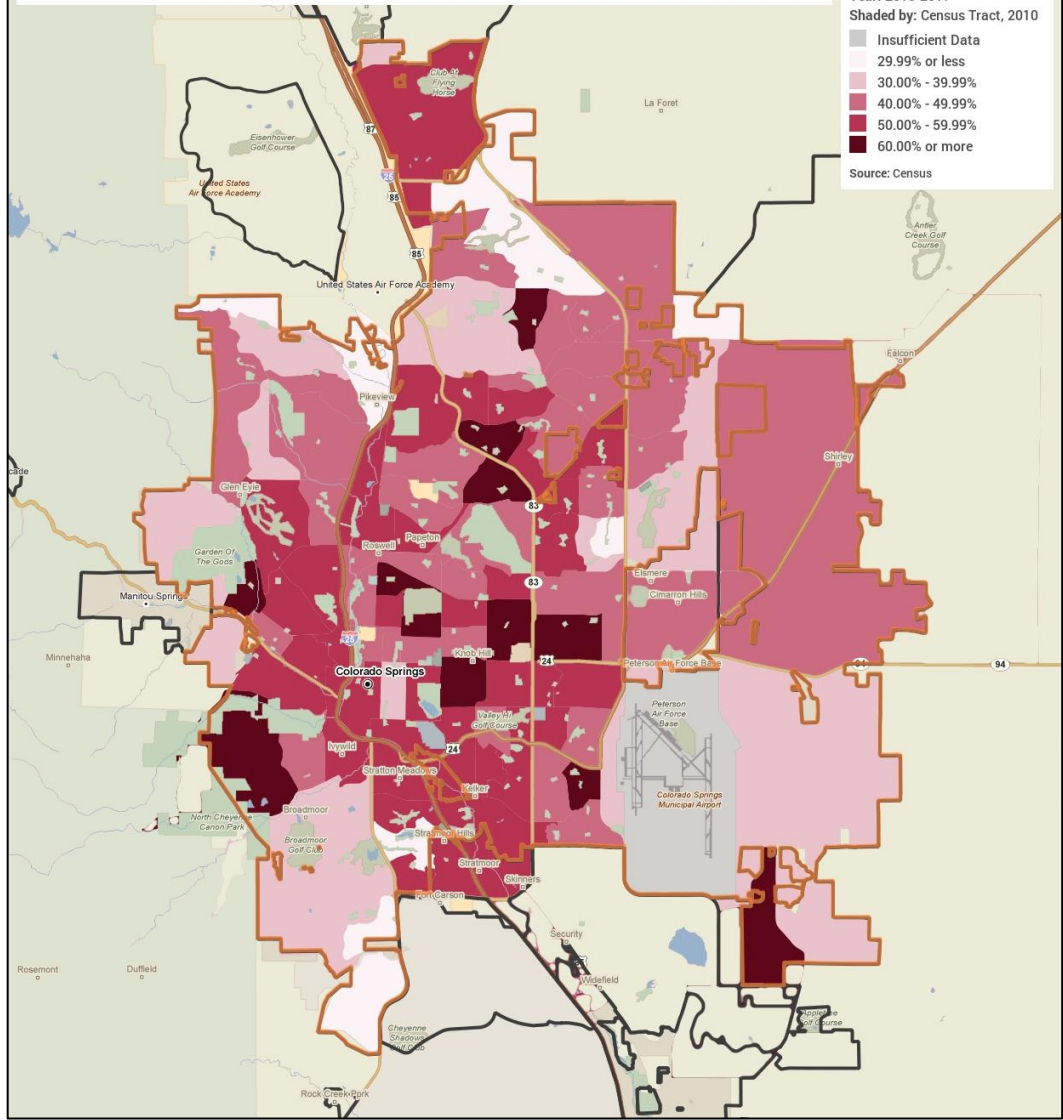


Estimated percent of all renters who are cost burdened between 2013-2017.

Percent of Renters who are Burdened
 Year: 2013-2017
 Shaded by: Census Tract, 2010

- Insufficient Data
- 29.99% or less
- 30.00% - 39.99%
- 40.00% - 49.99%
- 50.00% - 59.99%
- 60.00% or more

Source: Census



4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	3,800	1,465	275	5,540	1,170	1,155	440	2,765
Large Related	1,085	130	15	1,230	210	235	25	470
Elderly	1,750	425	245	2,420	1,145	530	220	1,895
Other	4,600	1,485	235	6,320	1,065	635	440	2,140
Total need by income	11,235	3,505	770	15,510	3,590	2,555	1,125	7,270

Table 10 – Cost Burden > 50%

Alternate Data Source Name:
2011-2015 CHAS

Severe Cost Burden

The data presented above show the severe cost burden in the City, which is defined as paying more than 50% of household income on housing cost.

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	1,135	910	1,070	300	3,415	120	175	130	35	460
Multiple, unrelated family households	95	85	0	60	240	40	50	4	40	134
Other, non-family households	40	60	85	30	215	0	0	0	0	0
Total need by income	1,270	1,055	1,155	390	3,870	160	225	134	75	594

Table 11 – Crowding Information – 1/2

Alternate Data Source Name:
2011-2015 CHAS

Overcrowding

HUD defines an overcrowded household as one having from 1.01 to 1.50 occupants per room and a severely overcrowded household as one with more than 1.50 occupants per room. This type of condition can be seen in both renter and homeowner households. Overcrowding was significantly more prevalent in renter-occupied housing units than in owner-occupied units.

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

According to the 2013-2017 American Community Survey 5-Year Estimates, 28.6% of occupied housing units in the City (50,313 households) are single-person households. Renters are more likely to live in a single-person household than homeowners. Approximately 36% of renter-occupied units are single-person households as compared to 23.3% of owner-occupied households.

Elderly residents who live alone may be in particular need of housing assistance. They are often on a fixed income and need assistance to maintain autonomy. In Colorado Springs, over 40% of all households with someone over the age of 65 are single-person households, over 16,713 people.

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

Disability

In Colorado Springs there are 55,779 individuals who have a disability. They represent 12.8% of the population. American Indian and Alaska Native or White residents are the most likely groups to have a disability. The disability rate is highest for older residents, which isn't surprising as disabilities become more prevalent as people age. Ambulatory difficulty is the most common disability with 25,718 individuals reporting it.

Victims of Rape and Domestic Violence

According to the Uniform Crime Report maintained by the US Department of Justice, there were 680 reported cases of rape in Colorado Springs in 2018 (the most recent year that data was available), which is a rate of 93.4 per 100,000. This is more than twice the national rate of 42.6 per 100,000. It is likely that the actual rate of rape is significantly higher as research has shown that rape is grossly underreported and undercounted by law enforcement agencies in the United States.

In 2018, Colorado Springs Police Department responded to over 11,500 domestic violence calls and over 1,600 sexual assault calls. Considering that domestic violence and rape are most often committed by family, friends, and/or co-inhabitants it is likely that there are thousands of people in the City who may be in need of housing assistance due to the violence they have experienced.

What are the most common housing problems?

Housing cost burden is the most common housing problem in Colorado Springs. This is true of both the renter population and owner population. Not only is there a significant population who are cost burdened, many are severely cost burdened and pay over 50% of their income to housing expenses. Many of these residents have a disability and/or are elderly, meaning they like have a fixed income or limited opportunities to increase their income to adjust to rising housing costs.

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

The 2015 CHAS data, while yielding different totals than the recent data from the Census Bureau, provide a more nuanced view into which segments of the population experience housing problems. In general, lower income households experience more housing problems across the board. The extremely low-income income range (30% AMI and below) is statistically more likely to have at least one problem than other income ranges, and extremely low-income renters more so than owners. When those facts intersect, we see that low and extremely low-income renters are more affected by housing problems than other groups. For example, extremely low-income renter households have greater rates of severe housing cost burden than all other groups.

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

As indicated in 2015 CHAS data in Housing Needs Summary Tables, the lack of affordable housing is by far the greatest housing problem for extremely low-income households and families with children in the region. For extremely low-income households, there are 3,735 homeowner households with severe housing cost burden greater than 50% and 10,225 renter households have severe housing cost burden greater than 50%. That means there are nearly 15,000 households in the City that are both extremely low income and have severe housing cost burden, which places them at imminent risk of becoming homeless. Furthermore, approximately 4,410 extremely low-income households in the City are households with one or more children 6 years and younger. These families are at imminent risk of homelessness.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

CDD defines at-risk populations as households making below 30% AMI and paying more than 50% of their income on housing costs. CDD identifies at-risk populations by using Census data to find tracts with the highest concentrations of at-risk households.

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

Persons identified to be at increased risk include: persons who are extremely low income; persons with disabilities; persons fleeing domestic violence; homeless persons being discharged from crisis units, hospitals and jails; unaccompanied youth and youth aging out of foster care. Additionally, persons and households who have already received notice that eviction proceedings have been started in court are also at risk of homelessness since they are the households most likely to be evicted without assistance.

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

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

Introduction

This section compares the existence of housing problems amongst racial groups against that of the jurisdiction as a whole in an effort to see if any group(s) share a disproportionate burden of the area's housing problems. For this purpose, HUD guidelines deem a disproportionately greater need to exist when persons of a particular racial or ethnic group experience housing problems at a rate at least 10 percentage points higher than the jurisdiction as a whole.

The following series of tables looks at the existence of housing problems amongst different racial and ethnic groups across the 0%-30%, 30%-50%, 50%-80%, and 80%-100% AMI households.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	18,370	2,250	1,635
White	11,200	1,545	1,025
Black / African American	1,690	210	225
Asian	435	40	25
American Indian, Alaska Native	80	10	0
Pacific Islander	60	0	0
Hispanic	4,265	355	340

Table 12 - Disproportionally Greater Need 0 - 30% AMI

Alternate Data Source Name:
2011-2015 CHAS

*The four housing problems are:

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

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	16,885	5,830	0
White	11,200	4,520	0
Black / African American	1,105	215	0
Asian	390	105	0
American Indian, Alaska Native	120	15	0
Pacific Islander	50	10	0
Hispanic	3,445	825	0

Table 13 - Disproportionally Greater Need 30 - 50% AMI

Alternate Data Source Name:
2011-2015 CHAS

*The four housing problems are:

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

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	15,710	16,865	0
White	11,020	12,135	0
Black / African American	1,285	1,200	0
Asian	300	405	0
American Indian, Alaska Native	65	30	0
Pacific Islander	35	90	0
Hispanic	2,480	2,665	0

Table 14 - Disproportionally Greater Need 50 - 80% AMI

Alternate Data Source Name:
2011-2015 CHAS

*The four housing problems are:

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

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,775	14,355	0
White	3,760	11,210	0
Black / African American	150	785	0
Asian	140	220	0
American Indian, Alaska Native	40	45	0
Pacific Islander	0	65	0
Hispanic	535	1,765	0

Table 15 - Disproportionally Greater Need 80 - 100% AMI

Alternate Data Source Name:
2011-2015 CHAS

*The four housing problems are:

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

Discussion

By HUD's definition of a disparity of 10% or higher and the available data, several different racial and ethnic groups experience a disproportionately greater need when it comes to housing problems. However, these groups are relatively small, and the margin of error may be large.

0-30% AMI

The jurisdiction wide prevalence of housing problems is 82.5% for this income group. Only one racial group experiences housing problems at a disproportionately higher rate. Approximately 100% of Pacific Islander households with 0-30% AMI has at least one housing problem. However, the number of households in this group is very small, there are only 60 households.

30-50% AMI

Overall, 74.3% of Colorado Springs' residents in this income group have a housing problem and there is one racial group who has housing problems at a disproportionately higher rate. Approximately 88.9% of American Indian households with 30-50% AMI have a housing problem. Again, this population is very small, there are approximately 135 households in this group.

50-80% AMI

Throughout Colorado Springs 48.2% of residents in this income group have at least one housing problem. Households from one racial group is disproportionately likely to have a housing problem: American Indian households where 68.4% experience housing problems. However, the total population for this group is small, only 95 households.

80-100% AMI

For those who earn 80-100% AMI the likelihood that they experience a housing problem is relatively small, only 25%. However, two racial groups have disproportionately higher rates of housing problems. Nearly 40% of Asian households and 47% of American Indian households have a housing problem. There are approximately 360 Asian households and 85 American Indian households in this income group.

Conclusion

The likelihood that a household experiences a housing problem decreases as incomes rise. In general, American Indian households experience housing problems at a disproportionate rate in more than one income group. While this population is relatively small it is still relevant that they experience problems at such a large rate when compared to other groups.

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

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

Introduction

This section compares the existence of severe housing problems amongst racial groups against that of the jurisdiction as a whole in an effort to see if any group(s) share a disproportionate burden of the area's severe housing problems. For this purpose, HUD guidelines deem a disproportionately greater need to exist when persons of a particular racial or ethnic group experience severe housing problems at a rate at least 10 percentage points higher than the jurisdiction as a whole.

The following series of tables looks at the existence of severe housing problems amongst different racial and ethnic groups across the 0%-30%, 30%-50%, 50%-80%, and 80%-100% AMI households.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	15,840	4,780	1,635
White	9,470	3,275	1,025
Black / African American	1,540	360	225
Asian	370	105	25
American Indian, Alaska Native	65	20	0
Pacific Islander	60	0	0
Hispanic	3,755	870	340

Table 16 – Severe Housing Problems 0 - 30% AMI

Alternate Data Source Name:
2011-2015 CHAS

*The four severe housing problems are:

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

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,860	14,860	0
White	5,430	10,290	0
Black / African American	390	925	0
Asian	220	280	0
American Indian, Alaska Native	35	100	0
Pacific Islander	35	20	0
Hispanic	1,520	2,750	0

Table 17 – Severe Housing Problems 30 - 50% AMI

Alternate Data Source Name:
2011-2015 CHAS

*The four severe housing problems are:

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

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,715	28,855	0
White	2,430	20,735	0
Black / African American	295	2,195	0
Asian	115	590	0
American Indian, Alaska Native	35	60	0
Pacific Islander	0	125	0
Hispanic	765	4,380	0

Table 18 – Severe Housing Problems 50 - 80% AMI

Alternate Data Source Name:
2011-2015 CHAS

*The four severe housing problems are:

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

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,150	17,975	0
White	845	14,130	0
Black / African American	0	930	0
Asian	95	270	0
American Indian, Alaska Native	0	85	0
Pacific Islander	0	65	0
Hispanic	205	2,095	0

Table 19 – Severe Housing Problems 80 - 100% AMI

Alternate Data Source Name:
2011-2015 CHAS

*The four severe housing problems are:

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

Discussion

By HUD's definition of a disparity of 10% or higher, several different racial and ethnic groups experience a disproportionately greater need when it comes to severe housing problems.

0-30% AMI

The jurisdiction wide prevalence of severe housing problems is 71.2% for this income group. It is estimated that one racial group is disproportionately affected by severe housing problems in this group. Every Pacific Islander household in this group has a severe housing problem.

30-50% AMI

Overall, 34.6% of Colorado Springs residents in this income group have a severe housing problem. There is one racial group with disproportionately high rates, Pacific Islander households. Sixty-three percent of those households have severe housing problems in this group.

50-80% AMI

Throughout Colorado Springs 11.4% of residents in this income group have at least one severe housing problem. Households from one racial group is disproportionately likely to have a severe housing problem: American Indian households. This group has a severe housing problem rate of 36.8%.

80-100% AMI

For those who earn 80-100% AMI the likelihood that they experience a severe housing problem is small, only 6%. However, one racial group is disproportionately impacted by severe housing problems in this group. Over 25% of Asian households report 1 or more severe housing problems.

Conclusion

The likelihood that a household experiences a severe housing problem decreases as incomes rise. Again, we see racial groups with relatively few households are disproportionately affected by severe housing problems. While these populations are small it is still relevant that they experience severe housing problems at such a large rate when compared to other groups.

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

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

Introduction:

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate 10 percentage points or greater than for the income level as a whole. The tables below indicate the share of households by race/ethnicity and income level experiencing cost burden at various levels (share of income devoted to housing costs).

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	114,830	32,695	25,240	1,680
White	90,910	22,985	17,035	1,055
Black / African American	5,200	2,320	1,960	235
Asian	2,620	680	680	25
American Indian, Alaska Native	345	200	135	0
Pacific Islander	320	60	85	0
Hispanic	12,910	5,345	4,535	340

Table 20 – Greater Need: Housing Cost Burdens AMI

Alternate Data Source Name:
2011-2015 CHAS

Discussion:

This section calculates the percentage of those with cost burden and severe cost burden within each racial or ethnic group in the City.

<=30% - Not Cost Burdened

Throughout Colorado Springs, approximately 65.8% of residents are not cost burdened according 2011-2015 CHAS data. There are three racial or ethnic groups that have disproportionately lower rates of households without a cost burden. Approximately 53.5% of African American households, 50.7% of American Indian households, and 55.8% of Hispanic households are not cost burdened.

30-50% - Cost Burdened

In Colorado Springs, 18.7% of the population is cost burdened. There is one racial group that is disproportionately cost burdened. Nearly 30% of American Indian households pay between 30% and 50% of their income to housing costs.

>50% - Severely Cost Burdened

Approximately 14.5% of all households in the City are severely cost burdened. There are no racial or ethnic groups that are disproportionately severely cost burdened.

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

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Housing Problems

0-30% AMI

The jurisdiction wide prevalence of housing problems is 82.5% for this income group. Only one racial group experiences housing problems at a disproportionately higher rate. Approximately 100% of Pacific Islander households with 0-30% AMI has at least one housing problem. However, the number of households in this group is very small, there are only 60 households.

30-50% AMI

Overall, 74.3% of residents in this income group have a housing problem and there is one racial group who has housing problems at a disproportionately higher rate. Approximately 88.9% of American Indian households with 30-50% AMI have a housing problem. Again, this population is very small, there are approximately 135 households in this group.

50-80% AMI

Throughout the City 48.2% of residents in this income group have at least one housing problem. Households from one racial group is disproportionately likely to have a housing problem: American Indian households where 68.4% experience housing problems. However, the total population for this group is small, only 95 households.

80-100% AMI

For those who earn 80-100% AMI the likelihood that they experience a housing problem is relatively small, only 25%. However, two racial groups have disproportionately higher rates of housing problems. Nearly 40% of Asian households and 47% of American Indian households have a housing problem. There are approximately 360 Asian households and 85 American Indian households in this income group.

Severe Housing Problems

0-30% AMI

The jurisdiction wide prevalence of severe housing problems is 71.2% for this income group. It is estimated that one racial group is disproportionately affected by severe housing problems in this group. Every Pacific Islander household in this group has a severe housing problem.

30-50% AMI

Overall, 34.6% of residents in this income group have a severe housing problem. There is one racial group with disproportionately high rates, Pacific Islander households with 63% of those households have severe housing problems in this group.

50-80% AMI

Approximately 11.4% of residents in this income group have at least one severe housing problem. Households from one racial group is disproportionately likely to have a severe housing problem: American Indian households. This group has a severe housing problem rate of 36.8%.

80-100% AMI

For those who earn 80-100% AMI the likelihood that they experience a severe housing problem is small, only 6%. However, one racial group is disproportionately impacted by severe housing problems in this group. Over 25% of Asian households report 1 or more severe housing problems.

Cost Burden

<=30% - Not Cost Burdened

In the City 65.8% of residents are not cost burdened. There are three racial or ethnic groups that have disproportionately lower rates of households without a cost burden. Approximately 53.5% of African American households, 50.7% of American Indian households, and 55.8% of Hispanic households are not cost burdened.

30-50% - Cost Burdened

In the City 18.7% of the population is cost burdened. There is one racial group that is disproportionately cost burdened. Nearly 30% of American Indian households pay between 30% and 50% of their income to housing costs.

>50% - Severely Cost Burdened

Approximately 14.5% of all households in the City are severely cost burdened. There are no racial or ethnic groups that are disproportionately severely cost burdened.

If they have needs not identified above, what are those needs?

There are no other needs that have been identified.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

An analysis of the geographic location of concentrations of racial and ethnic groups is included later in this document. See: MA-50 Needs and Market Analysis Discussion

NA-35 Public Housing – 91.205(b)

Introduction

Public housing was established to provide decent and safe rental housing for eligible low- and moderate-income families, the elderly, and persons with disabilities. Public housing includes federally subsidized, affordable housing that is owned and operated by the public housing authorities. The local housing authority operating in Colorado Springs is the Colorado Springs Housing Authority (CSHA). CSHA owns 706 units of public and senior housing and administers almost 2,300 tenant-based vouchers, in addition to another inventory. More detail appears in MA-25 Public and Assisted Housing.

CSHA’s units primarily serve the needs of extremely low-income households. To evaluate resident needs on an ongoing basis, the agency has a resident participation plan which encourages tenants to participate. Due to high demand for affordable rental housing and a long waiting list, the City has previously provided CSHA with funds for additional tenant-based rental assistance. The City will continue to partner with CSHA to assist in the delivery of affordable rental housing and provide opportunities for low-income households to access affordable housing outside of public housing units.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	36	685	2,377	0	2,377	0	0	0

Table 21 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	6,351	12,110	11,699	0	11,699	0	0
Average length of stay	0	1	5	6	0	6	0	0
Average Household size	0	1	2	2	0	2	0	0
# Homeless at admission	0	3	4	2	0	2	0	0
# of Elderly Program Participants (>62)	0	0	201	400	0	400	0	0
# of Disabled Families	0	20	184	689	0	689	0	0
# of Families requesting accessibility features	0	36	685	2,377	0	2,377	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 22 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	27	487	1,583	0	1,583	0	0	0
Black/African American	0	8	175	698	0	698	0	0	0
Asian	0	1	10	49	0	49	0	0	0
American Indian/Alaska Native	0	0	11	41	0	41	0	0	0
Pacific Islander	0	0	2	6	0	6	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 23 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	177	481	0	481	0	0	0
Not Hispanic	0	36	508	1,896	0	1,896	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

In accordance with Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8, reasonable accommodations will be made for individuals with handicaps or disabilities (applicants or residents). Such accommodations may include changes in the method of administering policies, procedures, or services.

As of early 2020, 613 households were in queue for a public housing unit. Of all households, 88% of households made less than 30% area median income, 70% were female heads of household, 5% were elderly, and 19% were approaching senior age. Close to 14% (84 households) were disabled and can be assumed to need an accessible unit (CSHA, Jan 2020).

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

The most immediate needs of residents in public housing and voucher program holders are availability of affordable housing and higher incomes that will help them become self-sustainable and enable them to move out of publicly assisted housing. As seen in the assessment of extremely low-income households (households with 30% AMI or less), lower income results in less access to affordable housing which leads to a higher likelihood a household will experience housing cost burden. Housing cost burden indicates that housing is not affordable and often translates to LMI households making tradeoffs in healthy food, medical care, savings, or accepting unsafe housing conditions. Currently, public housing and voucher program participants have a median income of between \$11,000 and \$12,000, which puts them in the extremely low-income household category. The average income of households on the public housing waiting list is \$9,585; the average income of households waiting for Section 8 units is \$13,846.

CSHA also continues to address the most immediate needs of its public housing residents by keeping the maximum number of housing authority units possible available and in good condition. For Section 8 Voucher Holders, an adequate supply of units affordable which are available to eligible applicants remains a need, including affordable housing that is accessible for persons with disabilities.

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

The needs of the population in publicly supported housing are comparable to the needs of the City's extremely low-income residents. They are largely the same group of residents. However, persons with disabilities, as reported elsewhere in this section, face barriers that make them more likely than the overall population to experience poverty and unemployment. The strong need for affordable, accessible housing among this group means that they are overrepresented on CSHA's waiting lists and among its current tenant households.

Households trying to exit homelessness face multiple barriers to housing and are a large segment of the population on the waiting lists for public housing (14%) and housing choice vouchers (19%).

Discussion

The majority of households in the city who could qualify by income for housing assistance do not receive any type of public housing assistance. The Colorado Springs Housing Authority serves the most vulnerable populations, with most beneficiaries making less than 30% AMI, and has a waiting list every year during its lottery window for the Section 8 voucher program.

Section 8 relies on the private sector to supply housing units to voucher recipients. While it is meant to give families more choice in their house hunt, rising rents and inconsistent landlord participation across the city means that CSHA's vouchers will cover fewer people while the community need continues to grow. The CSHA needs community partners who can offer other forms of housing assistance in order to improve housing stability measures across the city.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Homelessness is a particularly troublesome and complex issue that most communities across the United States must address. A major reason that homelessness is difficult to address is that it has many causes with overlapping and interrelated variables. The cause of any single person's homelessness often lies, not in a single factor, but at the convergence of many events and conditions. From one perspective, homelessness is an economic problem caused by unemployment, lack of affordable housing options, or poverty. From another perspective, homelessness is a health issue because many homeless persons struggle with mental illness, physical disabilities, HIV/AIDS, substance abuse, or a combination of those health factors. A third perspective is to view homelessness as a social problem with factors such as adverse childhood experiences (ACE), domestic violence, educational attainment, and race lying at the foundation. In reality, homelessness can be caused by all of these issues and they are often interrelated. Due to this complexity, addressing homelessness requires a collaborative and community-based approach.

The Stewart B. McKinney Homeless Assistance Act defines the “homeless” or “homeless individual” or “homeless person” as an individual who lacks a fixed, regular, and adequate night-time residence; and who has a primary night-time residence that is:

- A supervised publicly or privately-operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
- An institution that provides a temporary residence for individuals intended to be institutionalized; or
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	400	35	1,017	162	283	147
Persons in Households with Only Children	0	3	31	24	28	14
Persons in Households with Only Adults	714	408	4,429	2,225	3,311	68
Chronically Homeless Individuals	120	254				N/A
Chronically Homeless Families	1	1				N/A
Veterans	126	75	631			
Unaccompanied Child	44	43			N/A	
Persons with HIV	4	1			N/A	

Table 25 - Homeless Needs Assessment

Data Source Comments: El Paso County / Colorado Springs 2019 Point-in-Time; HMIS System Performance Report 10/1/17-9/30/18

Indicate if the homeless population is: Has No Rural Homeless

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

Chronically Homeless Individuals and Families: There are 374 chronically homeless individuals in the CoC's jurisdiction. Approximately 2/3rds of the them are unsheltered.

Families with Children: There are 435 individuals in families with children present. 400 of them are sheltered and 35 are unsheltered.

Veterans and Families: Nearly 200 residents experiencing homelessness are veterans. The majority of these residents are sheltered.

Unaccompanied Youth: Nearly 90 individuals who experience homelessness are unaccompanied youth. Approximately half are sheltered and half are unsheltered.

Number of People Becoming Homeless for the First Time: Due to the high number of missing data elements, the error rate is too high to report this number at this time.

Number of Days Homeless: The average number of days that individuals experienced homelessness was 74 days. For adult only hh the average number of days was 68; for households with adults and children, the average was 147 days; and for child only hh, the average was 14 days.

Exits from Homelessness: 3,629 hh exited to permanent housing situations last year. Of the 3,629 households that exited from homelessness last year, 12% (431) exited to permanent housing. 9% (298 hh) were adult only hh; 42% (119 hh) were adult and children hh; and 50% (14 hh) were child only hh. It should be noted that there have been a number of missing data elements identified in exits from homelessness, so the number exits to permanent housing is likely slightly higher than the data reflects. DQ issues are being identified at program levels and sent out monthly with a request to fix data errors within 30 days. For individuals residing in emergency shelters, this is often information that is not provided to the emergency shelters upon the client's departure.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	3,635	0
Black or African American	938	0
Asian	32	0
American Indian or Alaska Native	173	0
Pacific Islander	60	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	481	0
Not Hispanic	3,154	0

Data Source <https://stella-p.hudhdx2.info/demographics/?id=7323> Comments:

There are identified data quality issues such as record duplications and missing data variables. DQ issues are being identified at program levels and sent out monthly with a request to fix data errors within 15 days. These numbers are a better reflection of the demographics for sheltered individuals experiencing homelessness than has been available previously.

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

305 families or 1,017 people resided in emergency shelter or transitional housing last year. The point-in-time count counted an additional 10 families with 35 people that were unsheltered. Based on McKinney Vento counts of homeless children, (1,706 identified in Colorado Springs in the 17/18 school year) that this number is likely much higher. Based on this information, the estimated number of families needing housing assistance is roughly 350 households.

634 Veterans resided in emergency shelter or transitional housing last year. The 2019 Point-in-Time count identified 75 unsheltered Veterans. Based on this information, the number of Veterans needing housing assistance is roughly 650.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Comparing population demographic information from the 2010 census and the demographic information from HMIS, there is some racial disparity for people of color experiencing homelessness. The breakdown was as follows:

Race	Total Population	Homeless Population
White	84%	67%
Black or African American	8.10%	17%
Asian	4.40%	0.01%
American Indian or Alaska Native	2.30%	3%
Native Hawaiian or Other Pacific Islander	0.70%	1%

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Emergency shelter bed inventory increased from 592 in 2018 to 809 in 2019 (37%). The number of people that identified as unsheltered during the 2018 PIT was 513 and 444 in 2019 (13% decrease). It should be noted that weather during the 2019 PIT was significantly colder and snowier than in past counts and individuals indicated that they chose to stay in motels with others or stayed on a friend’s couch to escape the elements. Because of this, it is estimated that additional people would have been counted as unsheltered if the weather had been warmer.

The Bed Utilization rate of Transitional Housing beds averages around 95%

Discussion:

In both Emergency Shelter and transitional housing, the length of time that a person is homeless before they are moving into these units, is increasing.

Returns to homelessness: 34% of individuals that exit from emergency shelter to a permanent housing situation are returning to homelessness within 2 years. Almost 20% are returning to homelessness within 6 months. 8% of individuals that exit from transitional housing return to homelessness within 2 years. 3% were within 6 months. This indicates that the continuum of care within the Pikes Peak region, may need to consider follow-up casework for at least 6 months following a client's departure from their program. Note: Many individuals exit destinations are not being captured at the time that they are departing a program. This is a data quality element that is being addressed at the program level.

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

Introduction:

There are four primary groups with non-homeless special needs in the jurisdiction. They are the elderly and frail elderly, those with HIV/AIDS and their families, those with alcohol and/or drug addiction, and residents with a mentally or physically disability. This section will explain who they are, what their needs are, and how the city is accommodating or should accommodate these needs.

Describe the characteristics of special needs populations in your community:

Elderly: The elderly population faces increased challenges and providing decent, affordable housing is incredibly important. It is medically beneficial and emotionally comforting for this population to remain in a familiar setting and, as a result, strong emphasis is placed on the elderly maintaining a lifestyle that is as independent as possible. Unfortunately, the elderly population is often on a limited income and/or has a disability, which puts financial pressure on them that reduces independence. As prices throughout the community inflate, the elderly population generally lacks the ability to increase their income to match.

According to the most recent data available, there are approximately 81,867 residents over the age of 60 in the City, making up 18.2% of the population. Nearly 25,000 residents over the age of 60 have a disability, or 29.8 percent, and approximately 6,500 (7.9%) are below the poverty level. Elderly residents are more likely to live in owner-occupied residences than renter occupied residences, 58.6% and 41.4%, respectively. However, elderly residents face a high rate of cost-burdened housing, regardless of whether they are renting or in an owner-occupied home. Over 62 percent of elderly renters and 25% of owners are cost burdened.

Source: ACS 5-Year Estimates 2013-2017, S0102

HIV/AIDS: See discussion below.

Alcohol and Drug Addiction: Gathering accurate data about alcohol and drug addiction within a community is difficult. Addiction often goes unrecognized because people don't seek help. Only when someone overdoses, gets arrested, or seeks treatment are they counted in statistics.

Alcohol continues to be the most abused drug throughout the country. According to the CDC, excessive alcohol consumption costs the state of Colorado over \$5 million annually.

Like many communities, El Paso County is facing a public health crisis related to opioid use. Opioids were involved in nearly 1/3 of all drug related deaths between 2013 and 2015, a rate of 5.7 per 100,000 people. Between 2002 and 2013 the rate of heroin addiction doubled but the rate of heroin related overdose deaths increased significantly more, 286%.

Disability: There are 55,779 people in the City who have a disability, which is 12.8% of the population. Unsurprisingly, disability is correlated with age and older residents are more likely to have one or more disabilities. Ambulatory difficulty is the most common disability and Independent living difficulty is the second most common disability.

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

Elderly: Providing secure, safe, affordable, and stable housing for the elderly population is vitally important for this population. There are many factors that contribute to a healthy environment for the elderly including, but not limited to, access to health care, shopping, and social networks. A robust public transportation network is incredibly beneficial to assisting the elderly remain active and independent. Additionally, elderly residents' homes may need modifications to assist with any disabilities that may develop as a result of aging.

In Colorado Springs, a major stakeholder in assisting elderly residents is the Innovations in Aging Collaborative (IIAC). IIAC is a non-profit that was created to address aging issues and the growing senior population in Colorado Springs. They work to implement a strategic plan to make the city more age friendly in a way that is "welcoming and open to citizens of all ages and encourages maximum quality of life." The research they conducted is an important resource for determining the needs of elderly residents. They have identified eight domains that are necessary for livability: transportation, housing, social participation, respect and social inclusion, civic participation and employment, communication and information, community support and health services, and outdoor spaces and buildings.

HIV/AIDS: See discussion below.

Alcohol and Drug Addiction: Individuals with substance abuse problems need a strong network in order to stay healthy and sober. Their housing needs include sober living environments, support for employment, access to health facilities, and easy access to family and friend networks. Additionally, detoxification facilities are necessary when addiction is first recognized.

Disability: Individuals with developmental disabilities encompass a wide range of skill levels and abilities. Therefore, they have many of the same issues as the general population with the added needs that are unique to their capabilities. Individuals with disabilities usually have a lower income and have limited housing options. The individuals who have more independent skills tend to utilize subsidized housing options. Individuals requiring more support find residences in the public welfare funded community homes either sharing settings or privately-owned personal care settings. Many individuals continue to reside with parents and families throughout adulthood. Regardless of the housing situation, a common thread is the need for continuous support services dependent of the level of capabilities.

See Discussion below for Affordable and Accessible Housing Needs and Barriers: Community Voices in the Pikes Peak Region

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

According to the Biannual 2018 Colorado HIV Surveillance Report issued by the Colorado Department of Public Health and Environment, there are approximately 1,146 persons living with HIV/AIDS in El Paso County. This accounts for 87% of the HIV/AIDS-positive population in Colorado.

Persons with HIV/AIDS are in need of housing and supportive services. In the past, CDD has worked with agencies providing services to this segment of the population. There are housing vouchers available and other federal resources for supportive services. HIV and AIDS services for residents are available through the Pikes Peak United Way and the El Paso County Health Department. A disproportionate number of HIV/AIDS cases may also have other special needs such as substance abuse or mental health issues.

Discussion:

Affordable and Accessible Housing Needs and Barriers: Community Voices in the Pikes Peak Region

In 2015, the Independence Center released a report titled “Affordable and Accessible Housing Needs and Barriers: Community Voices in the Pikes Peak Region”. The report identified seven needs and four barriers that were recurring themes for residents with disabilities. The needs identified are:

- Affordable Housing with Access to Transportation
- Physically Accessible Homes and Walkways
- Accommodations for Service Animals and Emotional Support Animals
- Access to Supportive and Positive Community
- Safe and Healthy Living Conditions in Housing and Neighborhoods
- Flexible and Longer-Term Supportive Services, Programs, and Shelters
- Individual Advocacy and Assistance with Navigating the Housing System

The barriers found by the Independence Center are:

- Inadequate Affordable and Accessible Housing Stock
- Fragmentation Within the Housing System
- Gaps in Housing Resources and Services
- Stigmas and Abusive Behaviors

This report helped to form some of the affordable housing and special needs services goals in this Strategic Plan and is listed as one of the other local planning efforts considered when preparing this Plan in the PR-10.

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

Describe the jurisdiction’s need for Public Facilities:

A suitable living environment supports the quality of life of individuals and communities and may be improved by increasing the safety and livability of neighborhoods and access to quality facilities and services. The City of Colorado Springs’ need for Public Facilities is based on low to moderate income persons living in the City. The Division is very close to updating the city’s community centers with funds from the 2015-2019 program years. There remains, however, a lack of accessible public facilities to accommodate people of all abilities for services such as emergency shelter, civic participation, transitional housing, and other critical services for low-income communities.

The City has successful partnerships with local government agencies, housing providers, service providers, non-profits, and other interested groups to determine and meet the need for Public Facilities. The City of Colorado Springs is committed to providing diverse, exceptional, and sustainable services to the community through innovative and collaborative practices to fulfill the need for Public Facilities.

How were these needs determined?

These needs were determined through meetings with various public officials and citizens, and reviews of previous successes and areas of improvement in the City. Citizen input continues to place transit and transportation at the top of the list of public needs, along with affordable housing, for several years in a row. We acknowledge the need to collaborate with our transit providers in ensuring accessible facilities and closing gaps in service to the most vulnerable.

An internal group of City representative meet regularly to discuss the city’s ongoing facility needs to keep our public assets functional, accessible, and efficiently managed.

Describe the jurisdiction’s need for Public Improvements:

The City of Colorado Springs’ need for Public Improvements is based on low- to moderate-income persons living in Colorado Springs who require expanded and improved public infrastructure to ensure access and a higher standard of living.

How were these needs determined?

These needs were determined through plan reviews, alongside meetings with various public officials and citizens, and reviews of previous successes and areas of improvement in the City. Recent local elections also point to citizens’ desire for improved infrastructure across the city.

Several recent plans point to the need for more multimodal, affordable, sustainable, and accessible projects and routes for people of all abilities to use to connect to any neighborhood in the city.

- Comprehensive plans: PlanCOS, Colorado Springs Bike Master Plan, Park System Master Plan, 2040 Regional Transportation Plan
- Area and neighborhood plans: Building Healthy Places Report (Southeast Colorado Springs); Mill Street Neighborhood Plan; Experience Downtown Master Plan; S. Nevada and S. Tejon Railroad Underpass Study; North Nevada Transit Connectivity Study
- Studies for special populations: Age Friendly Colorado Springs, Affordable and Accessible Housing Needs and Barriers: Community Voices in the Pikes Peak Region

Describe the jurisdiction’s need for Public Services:

There is a need to provide support for local service providers with a focus on services for low- and moderate-income (LMI) populations. There is also a need to provide support for local service providers with a focus on services for special needs populations including homeless services and services for persons with disabilities in order to meet vital services and quality of life improvements for Special Needs populations.

Other priorities include housing stability services and assistance; mental health access and services; and childcare. **How were these needs determined?**

These needs were determined through meetings with various public officials and citizens, text polls conducted at public meetings, statistical analysis in this document, and reviews of previous successes and areas of improvement in the City.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The following section looks at the housing market within Colorado Springs by analyzing trends in structure, age, price, and tenure. This information, when partnered with data gathered in the Needs Analysis, allows the City to make informed decisions about how to use its scarce resources. As noted previously, providing sufficient housing is more than just having enough structures to house each person, it includes insuring that housing is safe, secure, decent, and affordable.

In addition to looking at the data from the housing stock, this section also looks at facilities that are available for residents facing homelessness and with special needs. Whenever possible, GIS mapping is used to supplement the data and look for any geographic patterns that may exist. These patterns will be utilized in conjunction with the information gathered in this document to determine if certain protected groups are disproportionately impacted. Finally, a variety of data sources are used to supplement the information that is provided by the US Census Bureau and the Department of Housing and Urban Development. These sources provide additional support for any conclusions and can provide a more nuanced view of any issues.

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

Introduction

This section examines the composition of the region’s housing stock in terms of housing type and tenure. Details are provided based on the number of units in the structure, multifamily housing distribution within the jurisdiction, unit size and tenure, as well as an analysis of owner-occupied and renter occupied housing.

A troubling trend throughout the country is the lack of homes that are not 1-unit detached or larger apartment complexes (10+ Units). This is also referred to as the “missing middle.” In Colorado Springs, 19.5% of the housing stock is “missing middle” homes. By contrast, 1-unit detached homes are 62% of all the homes in the City. Without enough “missing middle” units it can be difficult for low-income and first-time home buyers to enter the market, especially in Colorado Springs where the average price of homes has increased dramatically in the past several years. According to the Colorado Association of REALTORS, in July 2019 the median sales price of a single-family home in El Paso County was \$332,000, while in July 2017 it was \$285,968 – an increase of 16% in just three years. For comparison, the median sales price of a townhouse/condo was \$222,861 in July 2019 and \$192,000 in July 2017. The production cost per unit for multi-unit complexes is significantly lower than for 1-unit detached homes and that lower cost can help provide affordable housing for residents.

Due to the lack of housing types (missing middle), low-income households have fewer options to which homes it can buy or rent, forcing them to consider more expensive single-family homes or look elsewhere. This disproportionately effects minority households in Colorado Springs as all minority household races other than Asians earn significantly less than the citywide median income of \$58,158. Households that identify ethnically as Hispanic also earn well below the citywide median with a median income of \$44,619. (Source: 2013-2017 ACS, S1903)

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	115,559	62%
1-unit, attached structure	15,161	8%
2-4 units	11,507	6%
5-19 units	21,086	11%
20 or more units	19,482	10%
Mobile Home, boat, RV, van, etc.	3,814	2%
Total	186,609	100%

Table 26 – Residential Properties by Unit Number

Alternate Data Source Name:
2013-2017 ACS 5-Yr Estimates

Data Source Comments: The default data provided by HUD for the Consolidated Plan is from the 2011-2015 American Community Survey (ACS). This satisfies HUD's requirement for the data as its purpose is to provide a picture of the conditions and trends within the city, however where possible data was replaced with the most up to date 2013-2017 ACS. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Data for large groups, such as the total population, have a relatively low and acceptable margin of error. However, small subpopulations may have a large margin of error which renders the information less reliable. In these cases, it is important to view the situation through a broad lens and use supplementary data sources when available. Please refer to the American FactFinder website <https://factfinder.census.gov/> for more about MOE.

Residential Properties by Number of Units

The table above breaks down the City's housing stock by the number of units in each structure and by structure type. Traditional single-family, detached homes are most prominent, accounting for 62% of all housing units. Multi-family developments (5 or more units) account for 22% of all housing units in the City. Finally, 2% of housing units are classified as mobile home, boat, RV, van, etc.

As previously mentioned, 1-unit detached homes, or single-family homes are far more expensive than other types of homeowner housing. For comparison, according to the Colorado Association of REALTORS, the median sales price of a single-family home was \$332,000 while the median sales price of a townhouse/condo was \$222,861 in El Paso County in July 2019 – almost a third more in price. As the vast majority of homes in Colorado Springs are single-family homes, the cost of entry into a home in the city is very high and not amenable for new or smaller families. As these families grow into larger single-family homes, there must be a variety of housing types in the City and at different price points to make this a possibility in Colorado Springs. This is especially important as “missing middle” homes, homes that are not 1-unit detached or larger apartment complexes (10+ Units), become harder to find. Currently, there are three times more single-family homes than “missing middle” homes.

Source: 2013-2017 American Community Survey 5-Year Estimates

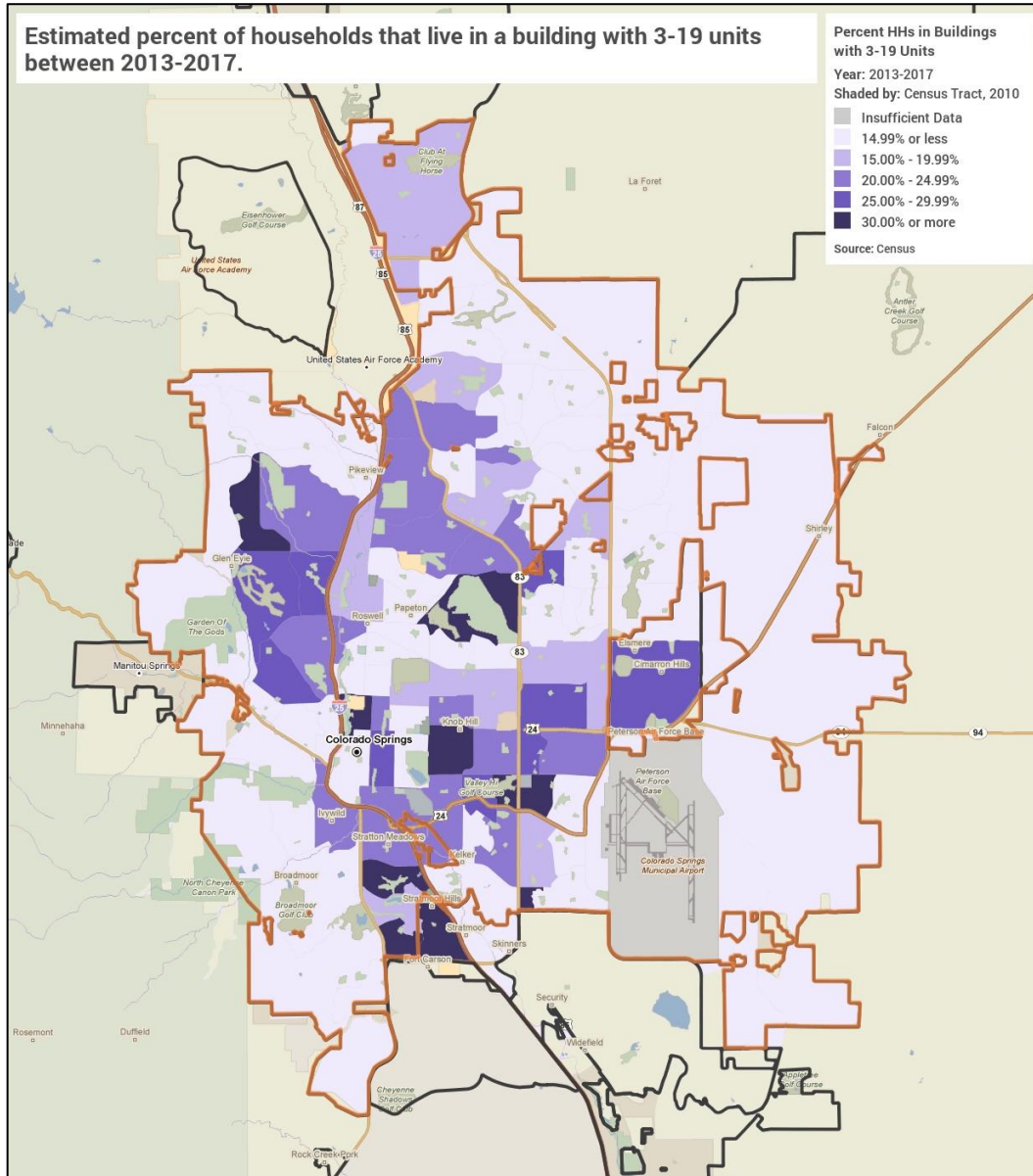
Multifamily Development Distribution

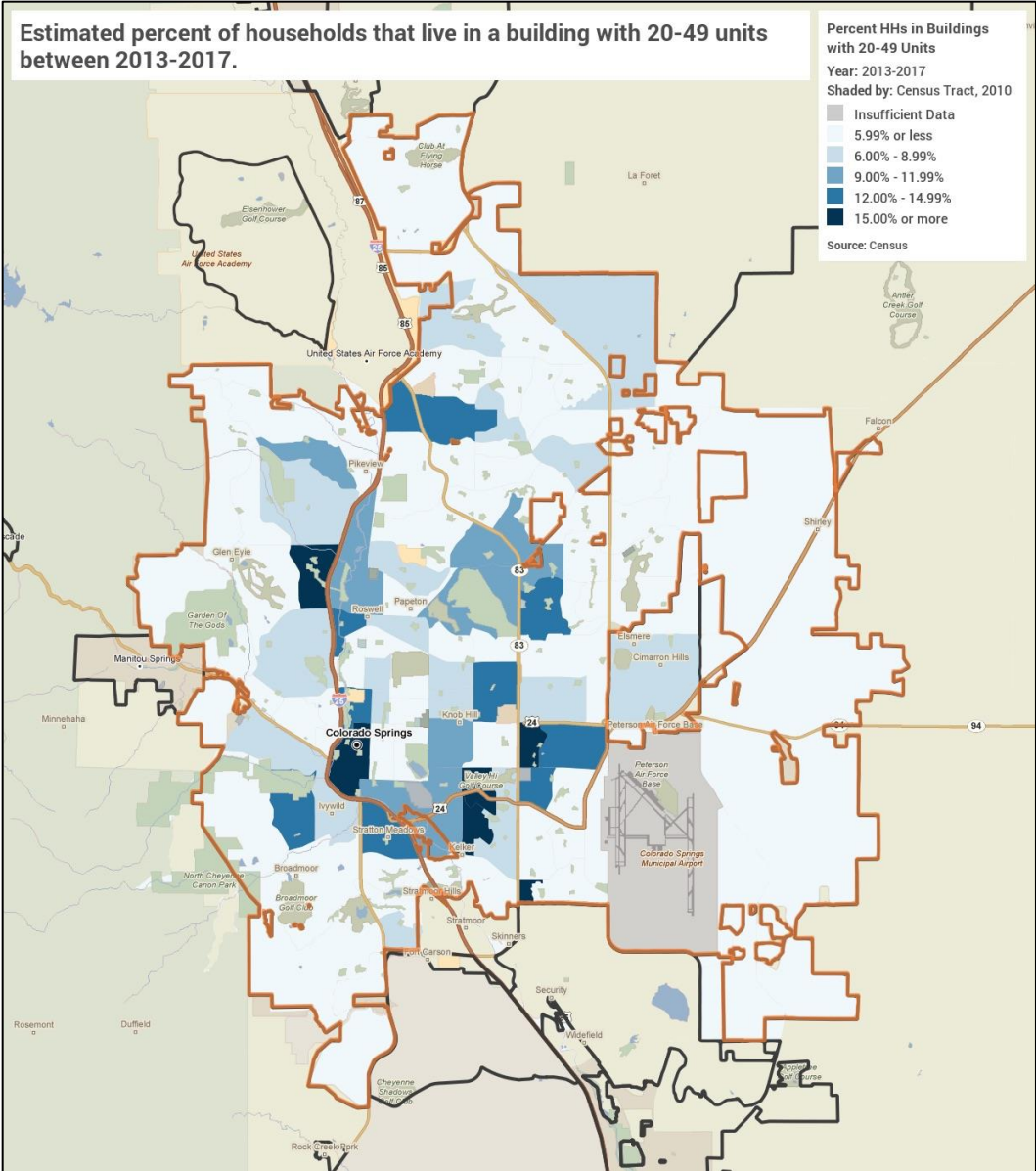
The maps below display the distribution of small, medium and large multifamily developments in the jurisdiction. Small multifamily units are buildings with 3-19 units, medium multifamily units are buildings with 20-49 units and large multifamily units are buildings with 50+ units. Multifamily developments exist throughout the city, with the larger (50+ units) buildings more common outside of the city center and placed along major highways, major institutions, and Southeast Colorado Springs. The downtown core features more medium-sized multifamily buildings than most parts of the city. The southwest quadrant of the city as well as the entire eastern area of the City (Banning Lewis Ranch) features very few multifamily projects of any size.

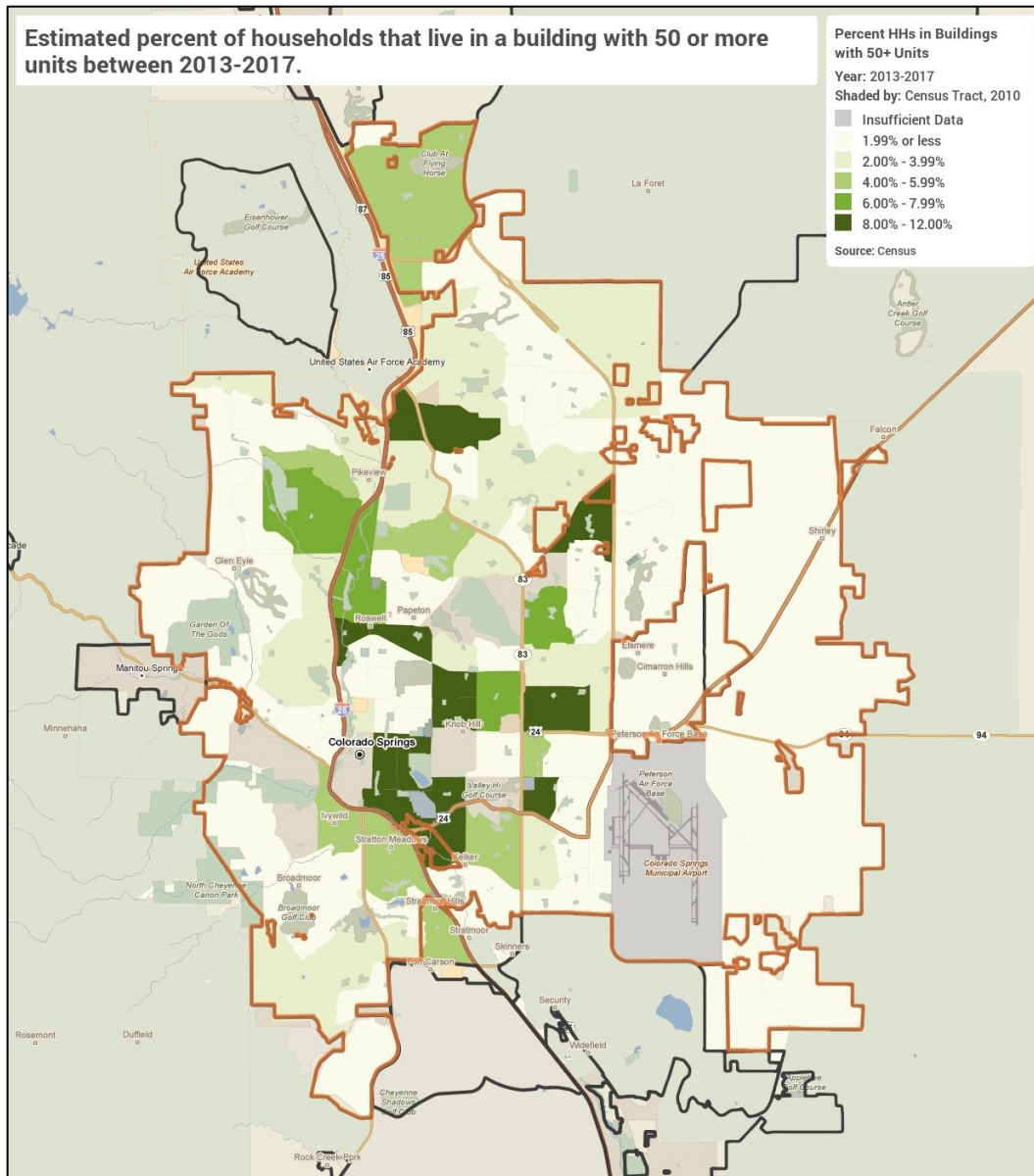
Almost the entire area east of Marksheffel Road and Colorado Springs Airport consists of Banning Lewis Ranch. Banning Lewis Ranch was annexed in 1988, however very little development in the area has happened since that time due to requirements from the original annexation agreement. However, in April

of 2018, City Council passed an amendment to the original Banning Lewis Ranch annexation agreement that replaced outdated zoning requirements and will now allow for increased developments that will improve the quality of life, housing and economic development of the area. This amendment would open Banning Lewis Ranch to the development of multi-unit properties.

Source: 2013-2017 American Community Survey 5-Year Estimates







Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	207	1%	2986	4%
1 bedroom	1440	1%	19237	26%
2 bedrooms	13966	14%	27600	38%
3 or more bedrooms	87593	85%	22997	32%
Total	103206	100%	72820	100%

Table 27 – Unit Size by Tenure

Alternate Data Source Name:
 2013-2017 ACS 5-Yr Estimates

Data Source Comments: The default data provided by HUD for the Consolidated Plan is from the 2011-2015 American Community Survey (ACS). This satisfies HUDs requirement for the data as its purpose is to provide a picture of the conditions and trends within the city, however where possible data was replaced with the most up to date 2013-2017 ACS. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Data for large groups, such as the total population, have a relatively low and acceptable margin of error. However, small subpopulations may have a large margin of error which renders the information less reliable. In these cases, it is important to view the situation through a broad lens and use supplementary data sources when available. Please refer to <https://factfinder.census.gov/> for more about MOE.

Unit Size by Tenure

The size of available units in the City differs considerably for owners and renters. Renter occupied units are much more likely to be smaller; nearly 70% of the units have 2 bedrooms or less. Owner-occupied units, on the other hand, are considerably larger. Over 80% of the units have 3 or more bedrooms.

Source: 2013-2017 American Community Survey 5-Year Estimates

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

The Colorado Springs Housing Authority (CSHA) is the largest provider of affordable housing in Colorado Springs. As of the 3rd Quarter of 2019, CSHA's programs currently house nearly 6,000 in the community. The programs include:

- Section 8 Vouchers: This rent subsidy program assists low-income households in obtaining decent, affordable, and safe housing. There are currently 2,290 households in this program.
- Public Housing: The CSHA owns and operates 813 units that are offered at subsidized rents for eligible families, seniors, and persons with disabilities.
- Senior Housing: Nine complexes in the City of Colorado Springs are provided for seniors by CSHA as part of the Public Housing and other housing assistance programs.
- Low-Income Housing Tax Credit (LIHTC): The City currently has 1,863 units in the program for low-income households.
- Down Payment Assistance Loans: There are 117 active loans in this program.

A more thorough analysis of publicly supported housing program recipients is conducted in MA-25, Public and Assisted Housing.

In addition to the above programs, the City of Colorado Springs utilizes public funds to address the priority needs and specific objectives identified in the strategic plan. This is accomplished through the following programs:

- Homeless Services – Emergency Solutions Grant (ESG)
- Community Housing Development Organization (CHDO) Housing Development (HOME)

- Tenant Based Rental Assistance (TBRA) (HOME)
- Residential Rehabilitation (CDBG and HOME)
- Affordable Housing Assistance (HOME)

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

Landlord participation in the Section 8 program expands and contracts according to market conditions. According to the HUD Multifamily Assistance & Section 8 Database there were 680 properties with active Section 8 contracts as of March 2019. This number changes monthly, though the overall share of participating private landlords in the market remains low during this strong housing market. The majority (62%) of these 680 properties have only one voucher-holding tenant while only 2% have more than 20 voucher holders.

LIHTC is the federal government's primary program for the development of affordable rental housing for low-income households. LIHTC's purpose is to encourage construction and rehab of low-income rental housing by providing federal income tax credit as an incentive to investors. This tax credit may be received for 10 years in return for investing equity capital into the development of eligible affordable housing projects. To qualify for this credit, a development project must meet certain requirements, such as setting aside a minimum number of units for qualified low-income renters and units that are subject to rent limits. At a minimum, LIHTC properties must remain affordable for 15-20 years. There is one tax-credit project in Colorado Spring expiring in 2021, leaving 60 units vulnerable to market rate transition.

Capital improvements for public housing units are consistently under-funded. Eventually, when units are not rehabilitated or replaced, they become a loss from the affordable housing inventory in the City. HUD provides public housing authorities with the option to preserve these affordable housing units through the Rental Assistance Demonstration (RAD) program. RAD allows a PHA to convert public housing property to Section 8 project-based vouchers (PBV) or Section 8 project-based rental assistance (PBRA). Because CSHA primarily serves extremely low-income households, currently there are no plans to convert its units to the RAD program.

The City of Colorado Springs is a recipient of HUD's HOME program and maintains a multifamily inspection list of 433 HOME units in the City. Housing projects developed with the assistance of HOME program funds have an affordability period enforced. The minimum period of affordability is based off the funds to support the development of the housing project. In the next five years, the City expects 186 units to expire from their affordability requirement. However, while the affordability period may be set to expire, there is little danger that the units managed by the City's local nonprofit housing providers would convert to market rate.

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

No, there is a lack of affordable units throughout the jurisdiction. From a quantitative standpoint, there may be ample units for the population as a whole. However, high home values and rents result in much of the housing stock being out of the affordable range for large portions of the population.

As noted in the Needs Assessment, there are nearly 60,000 households that are cost burdened in Colorado Springs and over 25,000 of them are extremely cost burdened. This points to a disconnect between the housing supply and residents' income. In order to address this, it is necessary that a variety of housing options exist, particularly smaller, lower cost owner-occupied units that will make the transition from renter to homeowner more feasible.

Describe the need for specific types of housing:

1. Affordable/attainable starter homes

Currently, the City lacks affordable housing options and housing variety within the owner-occupied market. In particular, there is a lack of smaller units available for residents who may not need three or more bedrooms in a starter home. In order for working families making up to 80% of the area median income to buy a home, they need housing options in the \$200,000 - \$250,000 range.

2. Affordable workforce rental housing

For renters, there is a lack of housing options for all household types making below 60% of the area median income. Many households working full-time still cannot afford market rate rental housing in Colorado Springs.

3. Permanent Supportive Housing

Households exiting homelessness and/or households with disabilities or multiple chronic conditions have the lowest incomes (<30% AMI) and the highest need for services. Permanent supportive housing, housing with onsite care services at deeply affordable rates, is a critical housing type needed to move people out of shelters and reduce recidivism.

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

Introduction

In this section, the cost of housing for both homeowners and renters in the City of Colorado Springs is described and analyzed. A review is made of the current home values and rents, as well as how those amounts have changed since 2000. Housing affordability and cost burden are major issues facing the residents of Colorado Springs. Whenever possible additional data sources are used to provide supporting evidence of trends and conclusions.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2017	% Change
Median Home Value	147,100	292,500	99%
Median Contract Rent	594	1,179	98%

Table 28 – Cost of Housing

Alternate Data Source Name:

2000 Census, PPAR (Q1 2019), CSMAAV & RS (Q1 2019)

Data Source Comments: Pikes Peak Association of Realtors (Q1 2019), Colorado Springs Metro Area Apartment Vacancy and Rent Study (Q1 2019)

Rent Paid	Number	%
Less than \$500	3,539	5%
\$500-999	31,462	44%
\$1,000-1,499	23,794	33%
\$1,500-1,999	9,355	13%
\$2,000 or more	3,322	5%
Total	71,472	100.0%

Table 29 - Rent Paid

Alternate Data Source Name:

2013-2017 ACS 5-Yr Estimates

Data Source Comments: The default data provided by HUD for the Consolidated Plan is from the 2011-2015 American Community Survey (ACS). This satisfies HUDs requirement for the data as its purpose is to provide a picture of the conditions and trends within the city, however where possible data was replaced with the most up to date 2013-2017 ACS. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Please refer to the American FactFinder website <https://factfinder.census.gov/> for more about MOE.

Housing Costs

According to the data provided by the US Census Bureau and a local Rent Study from 2019, housing costs in Colorado Springs have nearly doubled for both homeowners and renters. It is highly unlikely that a household living in Colorado Springs has seen their income grow at a similar rate; between 2000 and 2017 the median household income increased only 29% according to the latest ACS data. That disconnect between income growth and housing cost growth is particularly problematic for renters who will not benefit from an increase in home value. As seen below, approximately 18% of renters pay over \$1,500 in

rent. When you factor in renter's insurance, utilities, and other expenses it is likely the housing costs for most renters are over \$2,000. These renters would need an annual household income of approximately \$72,000 to avoid being cost-burdened.

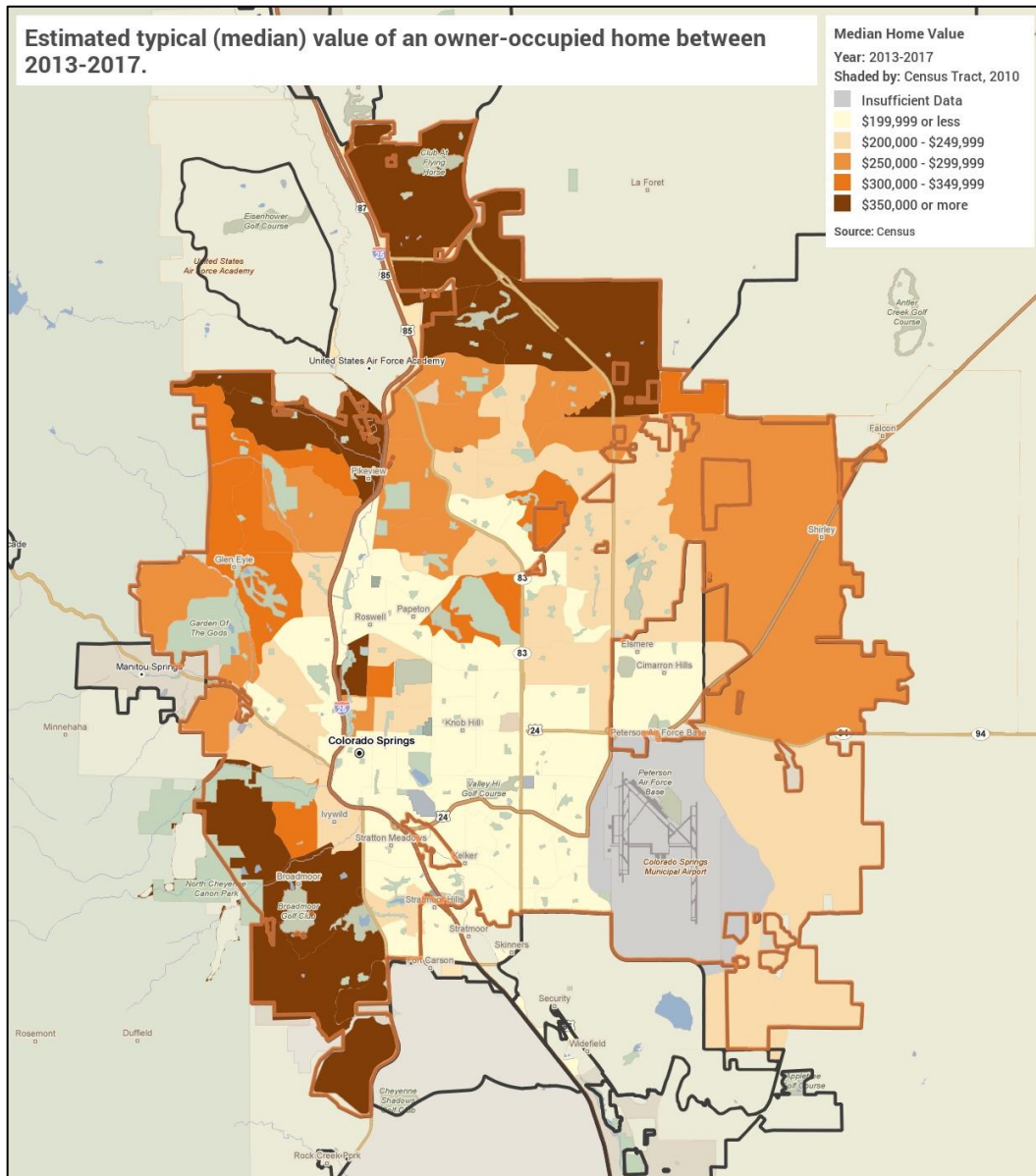
The following maps display geographically the median home value and rent throughout Colorado Springs by census tract. Though the citywide Median Home Value is \$292,500 this value varies significantly throughout the City. Home values are significantly higher in the tracts to the far north and south of the city, as well as the northern area of downtown. These tracts have a median home value of \$350,000 or more. That is nearly twice the home value of many tracts throughout the City, particularly between downtown and the airport. This points to a concentration of high cost housing that may prevent low-income households from accessing low-poverty areas. Homes in these areas are unaffordable to many residents.

Source: 2013-2017 American Community Survey 5-Year Estimates

Home Value

The map below shows the median home value by census tract throughout the jurisdiction. Most of the tracts further from the urban center have Median Home Values greater than \$250,000, which is considerably higher than downtown census tracts where the Median Home Value is less than \$200,000.

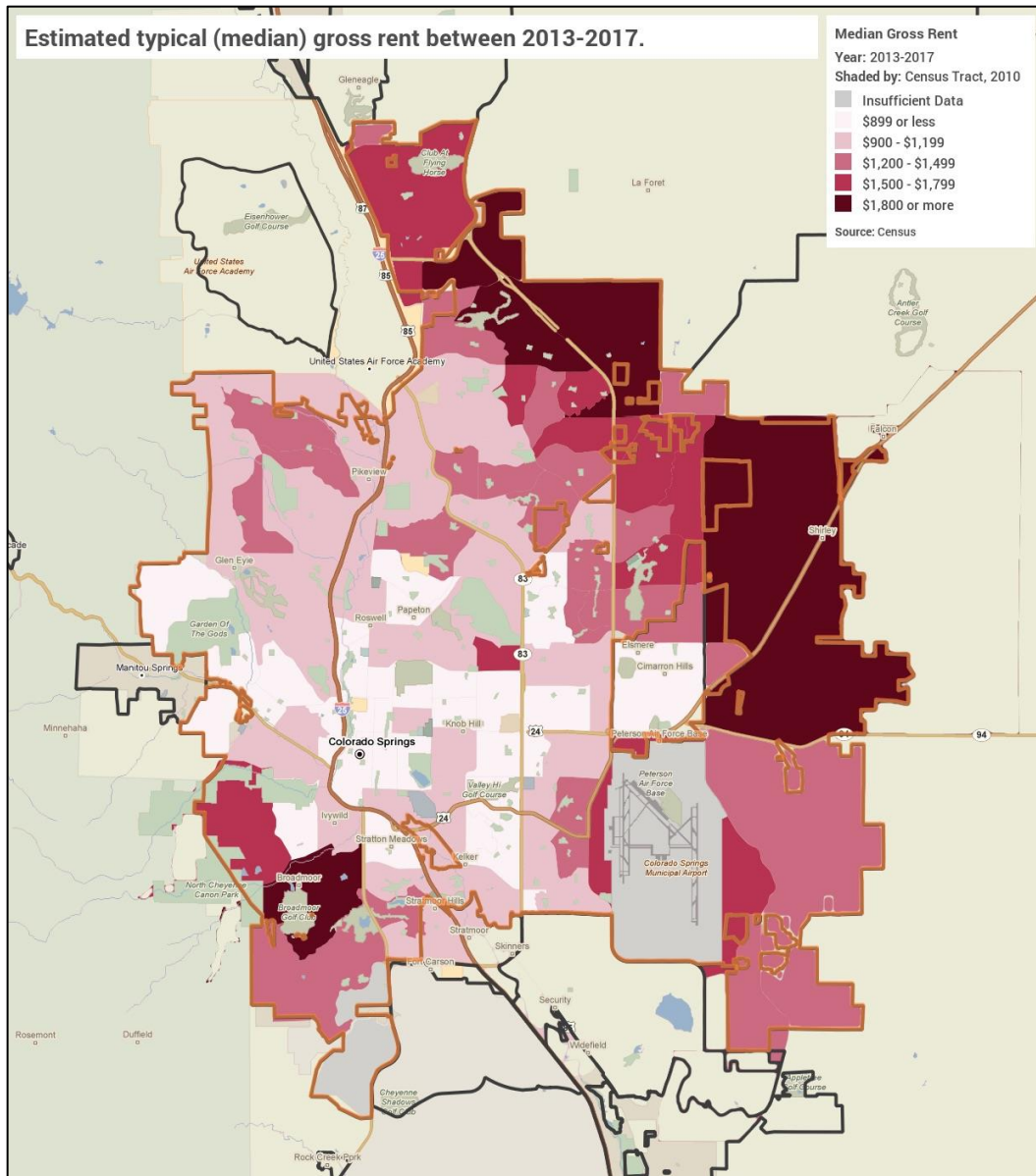
Source: 2013-2017 American Community Survey 5-Year Estimates



Median Rent

The map below displays the median rent by census tract. The distribution of high median rents is similar to high home values. Tracts further away from downtown have a median rent of nearly \$2000 while tracts more centrally located have a median rent of half of that. This, again, points to areas of the City being inaccessible to many residents due to the high housing costs.

Source: 2013-2017 American Community Survey 5-Year Estimates



Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,655	No Data
50% HAMFI	18,825	5,310
80% HAMFI	46,735	23,380
100% HAMFI	No Data	36,443
Total	68,215	65,133

Table 30 – Housing Affordability

Data Source: 2011-2015 CHAS

Housing Affordability

HAMFI (HUD Area Median Family Income) is the median family income calculated by HUD for each jurisdiction, in order to determine Fair Market Rents (FMRs) and income limits for HUD programs. In 2019, the median family income for Colorado Springs is \$73,569. That means at 50% of the median family income, only 21,480 rental units were affordable to renter households. For homeowners, accounting for “no data” for units 30% HAMFI or less, there were only 5,310 homes affordable for homeowners with 50% median family income or less. The availability of affordable housing is clearly linked to household income. While the most recent data available is from 2011-2015 it can still be an indicator of affordability in the community.

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	684	833	1,064	1,538	1,869
High HOME Rent	684	833	1,064	1,342	1,478
Low HOME Rent	684	763	916	1,058	1,181

Table 31 – Monthly Rent

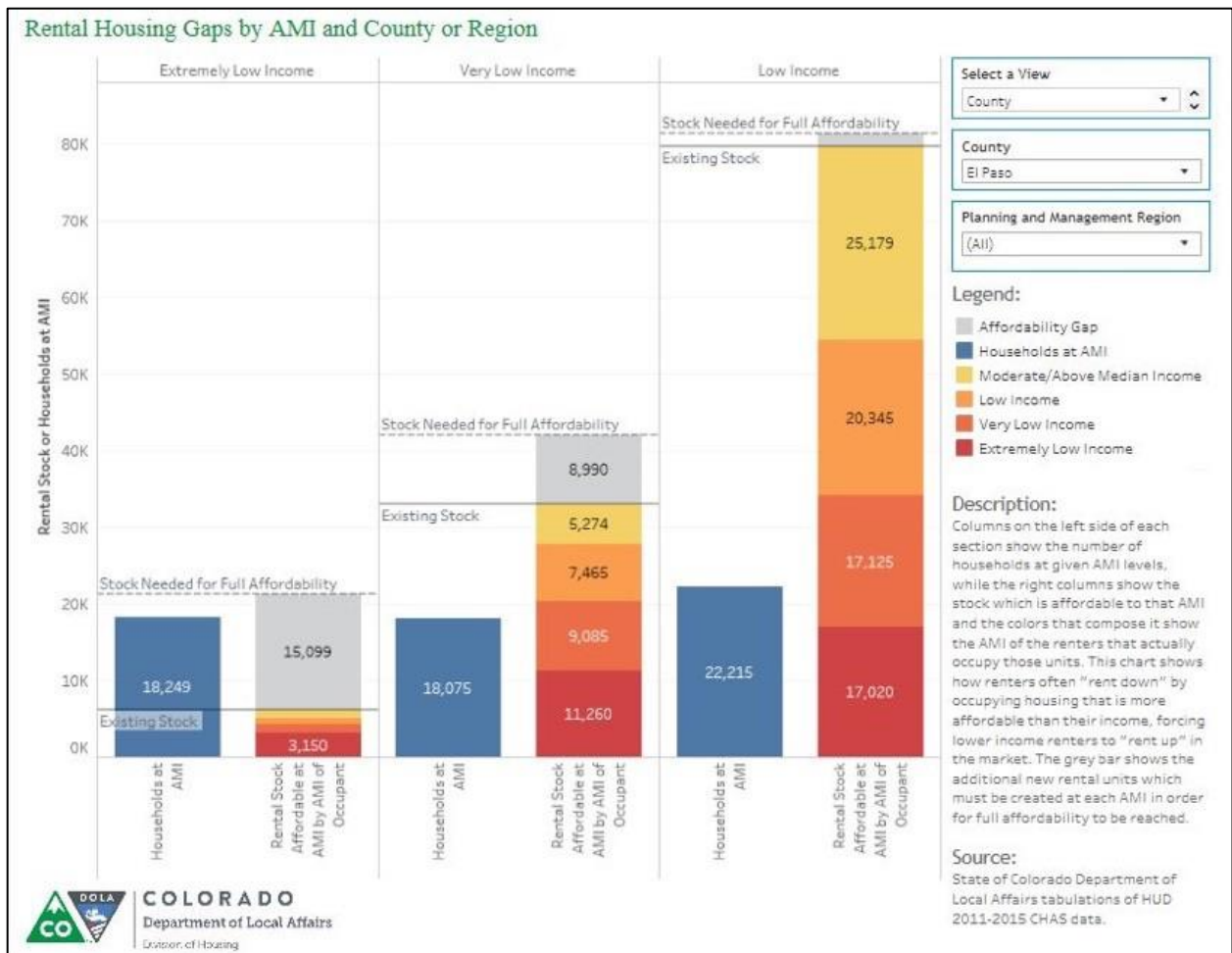
Alternate Data Source Name:
HUD 2019 FMR and HOME Rents

HUD FMR and HOME Rent Limit

Fair Market Rents (FMRs) are set by HUD and used to determine payment standard amounts for HUD Programs. HUD annually estimates FMRs for the Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas and each nonmetropolitan county.

HOME Rents Limits are based on FMRs published by HUD. HOME Rent Limits are the maximum amount that may be charged for rent in HOME-assisted rental units and are applicable to new HOME leases.

Colorado Springs, however, is one of 24 metro areas required to use Small Area Fair Market Rents (SAFMRs) as of April 2018. These rates set voucher values at the neighborhood level (defined by ZIP code), rather than the metro level. According to HUD’s 2019 SAFMR calculations for Colorado Springs, the rents range from \$670 to \$1,260.



Rental Housing Gap by AMI and County or Region

Is there sufficient housing for households at all income levels?

The National Low-Income Housing Coalition (NLIHC) provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S.

In the Colorado Springs MSA, the 2019 FMR for a two-bedroom apartment is \$1,064. In order to afford this level of rent and utilities without paying more than 30% of income on housing, a household must earn approximately \$3,500 monthly or \$42,000 annually. Assuming a 40-hour work week, 52 weeks per year, this translates into a minimum “Affordable Housing Wage” of \$20.19/hour.

In Colorado Springs, a minimum-wage worker earns an hourly wage of \$11.10. In order to afford the FMR for a two-bedroom apartment, a minimum-wage earner must work approximately 73 hours per week, 52 weeks per year. The monthly rent affordable at minimum wage in Colorado Springs is \$532. There are not enough units priced at this level to supply lower-income households.

Utilizing the results of the data analysis presented throughout the report, it is clear that there is insufficient housing for all income levels below 100% AMI. Low- and moderate-income households face high levels of cost burden and other housing problems resulting from a lack of affordable housing supply.

To show this shortage graphically, the chart above shows the gaps in housing inventory in El Paso County compared to the income levels of its population using 2015 CHAS data. The biggest gaps in housing stock exist for households making less than 50% AMI (Very Low Income) and 30% AMI (Extremely Low Income). For every 100 rental units available for Very Low-Income households about 28 are affordable and for Extremely Low-Income households, for every 100 rental homes, only 17 are affordable.

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

As noted in the analysis above, from 2000 to 2019, median home values nearly doubled (99% increase), as did the median gross rent (98% increase). The continued high price of both owner-occupied and rental housing reduces the ability of low-income households to find affordable housing. In addition, there are a high number of owner-occupied and renter-occupied households that are cost burdened. Given the population growth in the region it is likely that affordability will continue to be a problem within Colorado Springs.

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

The median contract rent in Colorado Springs was \$1,179 and approximately 33% of renters pay between \$1,000 and \$1,499. The Area Median Rent is between a 2-bedroom and 3-bedroom unit for the Fair Market Rent and the High HOME Rent. The area median rent is between a 1-bedroom and 2-bedroom unit for the Low HOME Rent.

Discussion

Housing affordability is a problem in Colorado Springs. The median rent and housing value have increased substantially since 2000 and there is little indication that this trend will change. Areas with newer homes are also the areas where home values are higher than average, an issue that will be explored in the next section. When income is closely related to race or ethnicity these areas that are inaccessible to low-income residents may lead to Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs).

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

Introduction

The tables and maps in this section provide details on the condition of housing units in the region by looking at factors such as age, vacancy, and the prevalence of housing problems.

As defined by HUD, the four housing problems are:

- 1) a home which lacks complete or adequate kitchen facilities
- 2) a home which lacks complete or adequate plumbing facilities
- 3) a home which is overcrowded (having more than one person per room)
- 4) a household that is cost burdened (paying 30% or more of their income towards housing costs)

Definitions

The following definitions apply specifically to residential dwelling units in the City of Colorado Springs:

Standard Condition: A dwelling unit that is in substantial compliance with City codes and ordinances regulating public health and sanitation, including the minimum standards for dwellings established by the City of Colorado Springs, and the property rehabilitation standards established by the Housing and Community Initiatives Division.

Substandard Condition Suitable for Rehabilitation: A dwelling unit that does **not** meet on or more of the criteria established above, but is suitable for rehabilitation within the guidelines established for specific Housing and Community Initiatives programs.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	23,022	22%	33,813	46%
With two selected Conditions	276	0%	3,141	4%
With three selected Conditions	5	0%	73	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	79,903	77%	35,793	49%
Total	103,206	99%	72,820	99%

Table 32 - Condition of Units

Alternate Data Source Name:
2013-2017 ACS 5-Yr Estimates

Data Source Comments: The default data provided by HUD for the Consolidated Plan is from the 2011-2015 American Community Survey (ACS). This satisfies HUDs requirement for the data as its purpose is to provide a picture of the conditions and trends within the city, however where possible data was replaced with the most up to date 2013-2017 ACS. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Please refer to the American FactFinder website <https://factfinder.census.gov/> for more about MOE.

Housing Conditions

The table above details the number of owner and renter households that have at least one housing condition. Twenty-two percent of all owner-occupied housing units face at least one housing condition while 46% of all renters have at least one housing condition. Generally speaking, there are relatively few households with multiple housing problems and when compared to the affordability statistics provided earlier in this section, it is clear that the overwhelming majority of housing problems are housing cost burden.

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	22,828	22%	13,246	18%
1980-1999	36,615	35%	25,531	35%
1950-1979	36,638	35%	27,966	38%
Before 1950	7,125	7%	6,077	8%
Total	103,206	99%	72,820	99%

Table 33 – Year Unit Built

Alternate Data Source Name:
2013-2017 ACS 5-Yr Estimates

Data Source Comments: The default data provided by HUD for the Consolidated Plan is from the 2011-2015 American Community Survey (ACS). This satisfies HUDs requirement for the data as its purpose is to provide a picture of the conditions and trends within the city, however where possible data was replaced with the most up to date 2013-2017 ACS. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Please refer to the American FactFinder website <https://factfinder.census.gov/> for more about MOE.

Year Unit Built

The year a house is built is often correlated with whether or not it is in substandard condition. Older homes are more likely to need regular maintenance in order to provide safe and secure living environments for residents. When looking at the age of a home an important factor is whether it was built before 1978. Prior to 1978 lead-based paint was used in many homes and the presence of that paint can cause significant health problems for residents, particularly children, the elderly, and those with compromised immune systems. Due to the way data is collected by the US Census Bureau, homes built prior to 1980 will be considered as having a possible lead-based paint hazard.

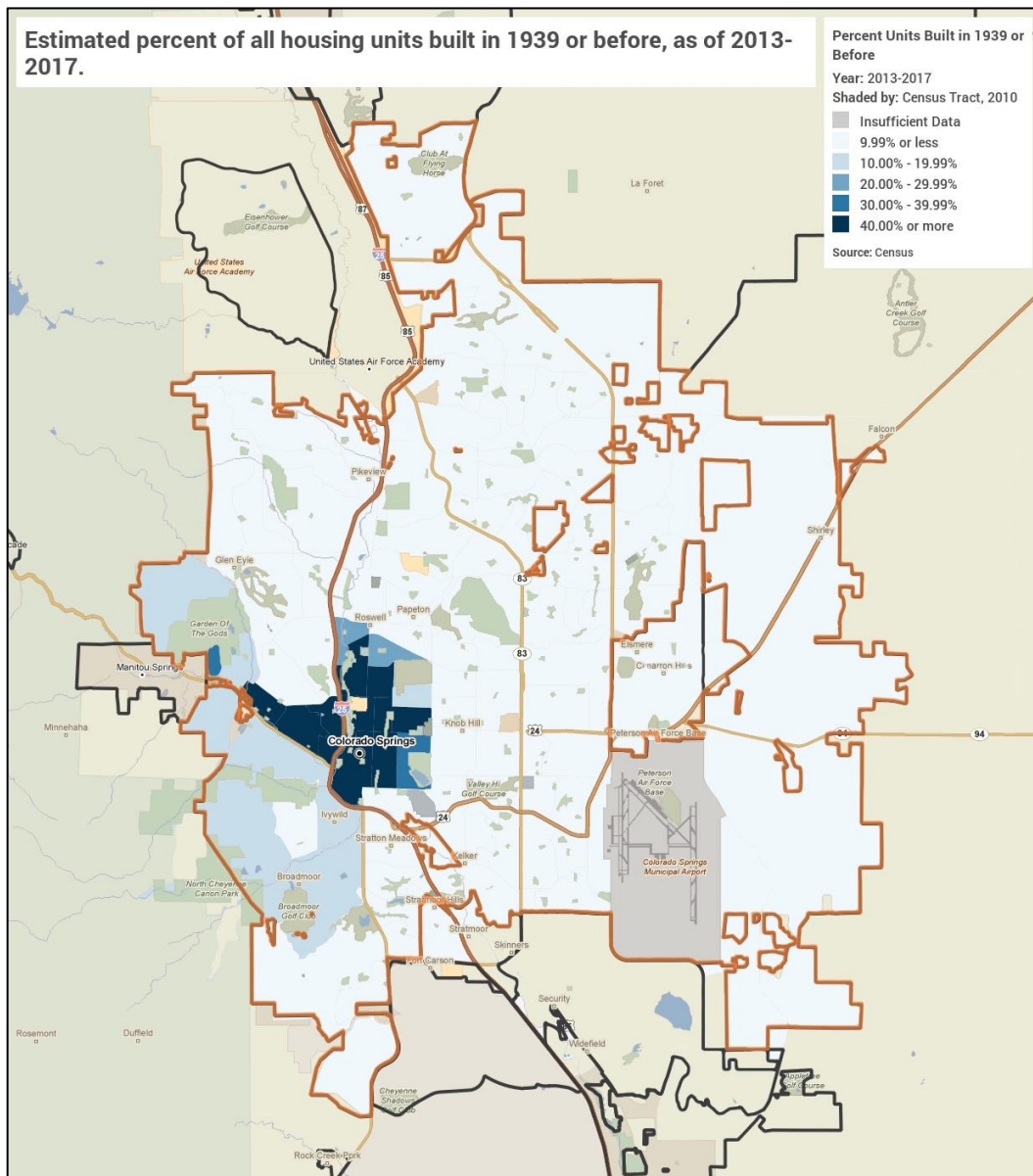
The majority of both renter-occupied and owner-occupied housing units were built between 1950 and 1999. Since 2000, over 36,000 units have been added to the market. Approximately two-thirds of the new units constructed are owner-occupied. There are currently over 77,000 housing units that were built before 1980. These homes are at an increased risk of Lead-Based Paint Hazard and may need significant remediation during any rehabilitation that may occur as they age.

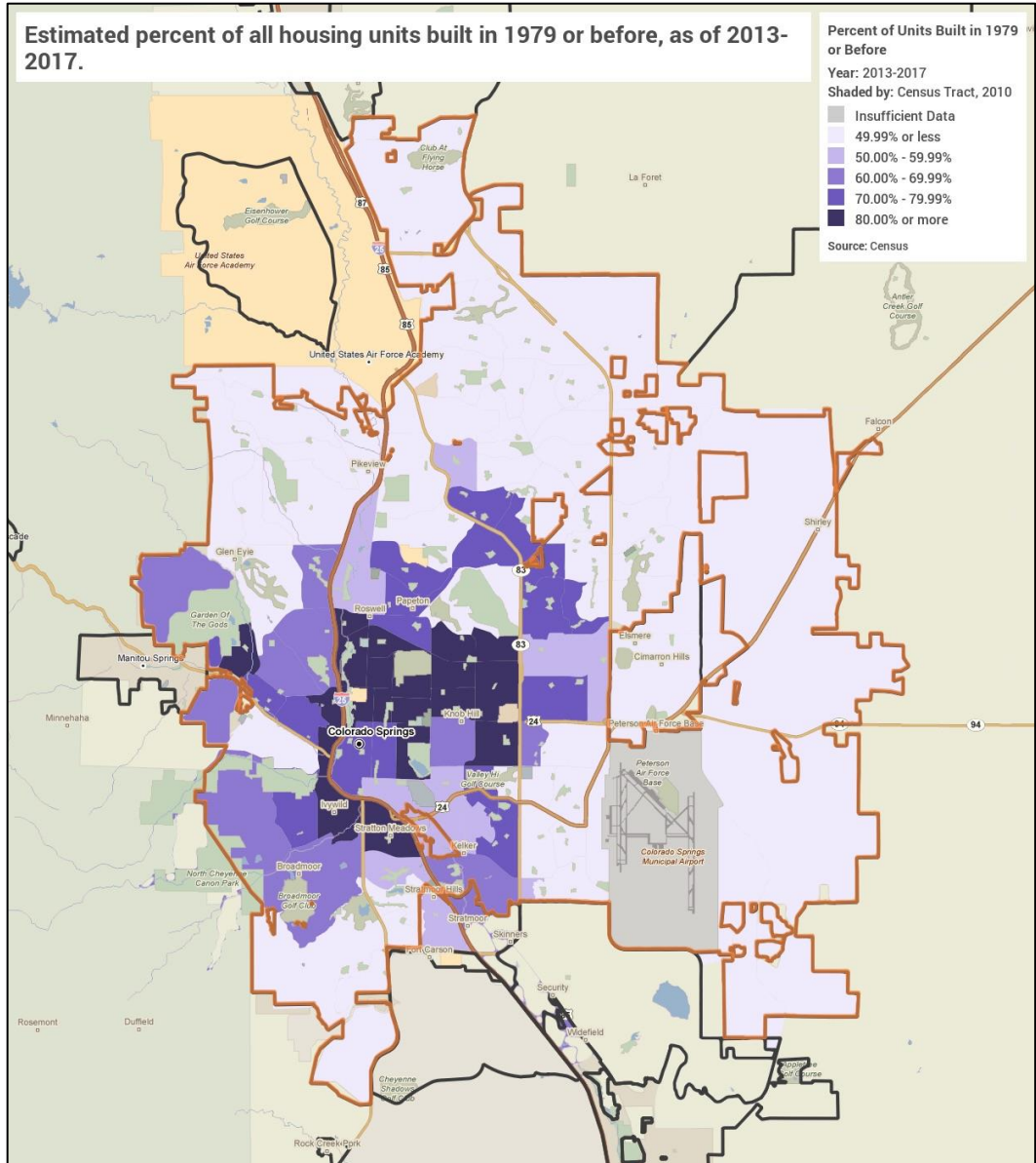
Source: 2013-2017 American Community Survey 5-Year Estimates

Age of Housing

The maps below depict the prevalence of older housing units in the City. The first set of maps identifies the percentage of rental units built prior to 1940 while the second set of maps depicts rental units built prior to 1980. The darker shaded areas have higher concentrations of the older housing stock. The City of Colorado Springs exhibits a classic building pattern for an expanding urban area. Older homes are heavily concentrated in a downtown area and newer homes expand outwards from this center.

Source: 2013-2017 American Community Survey 5-Year Estimates





Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	43,763	42%	34,043	47%
Housing Units build before 1980 with children present	17,221	17%	8,752	12%

Table 34 – Risk of Lead-Based Paint

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

Lead-Based Paint Hazard

As mentioned previously, any housing unit built prior to 1980 may contain lead-based paint in portions of the home. The most common locations are window and door frames, walls, and ceilings, and in some cases throughout the entire home. Thus, it is generally accepted that these homes at least have a risk of lead-based paint hazards and should be tested in accordance with HUD standards. The greatest potential for lead-based paint and other environmental and safety hazards is in homes built before 1980. Within the City there are over 77,000 total housing units (both owner- and renter-occupied) built before 1980.

Later in this section, we analyze lead-based paint hazards and risk for lead exposure for older owner- and renter-occupied housing for families with children.

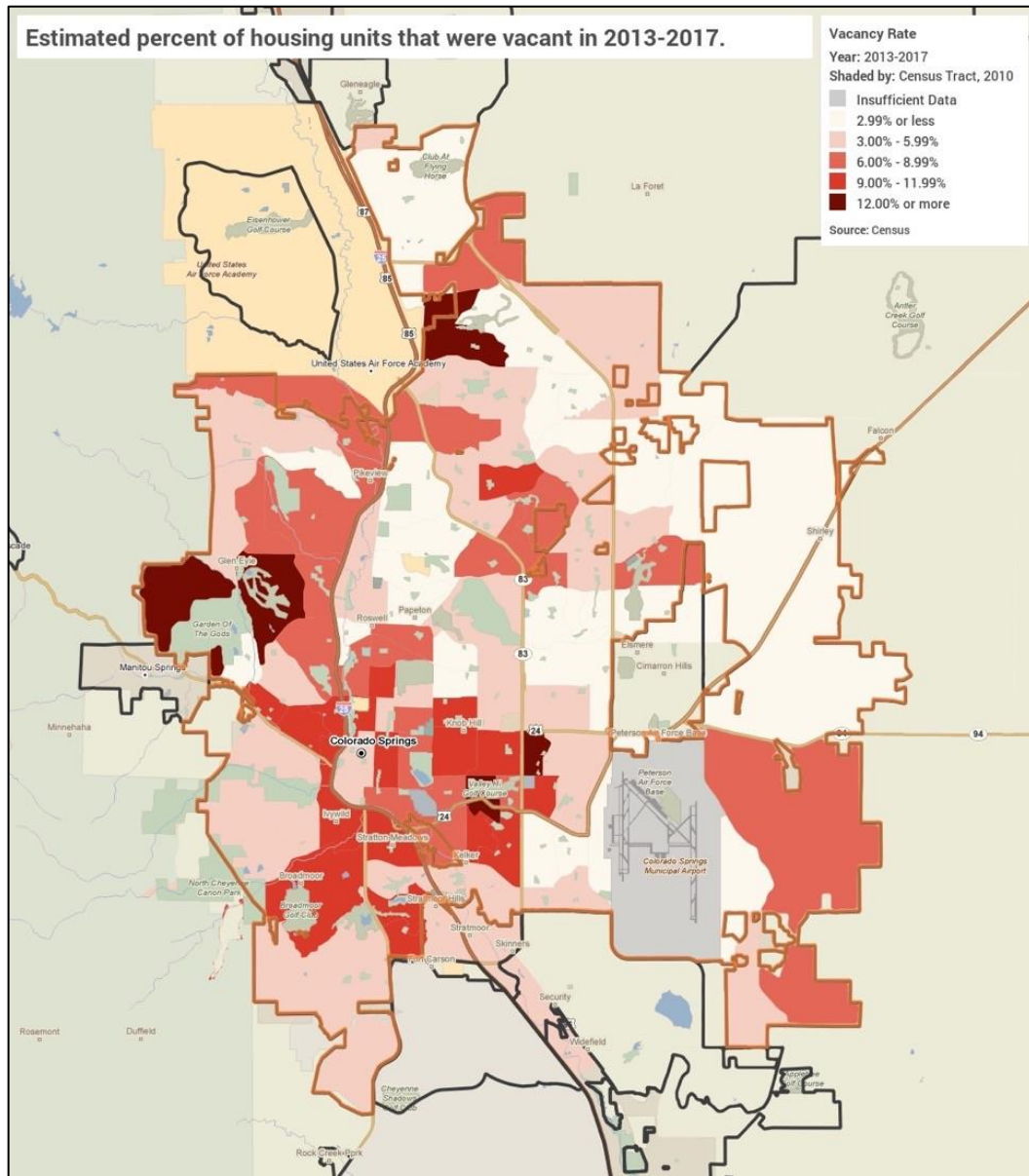
Vacancy Rate

The vacancy rate is the rate of homes that are currently unoccupied in a community. It is normal for a city to have vacant units and the general rule is that a vacancy rate of 7% of rental units and 2% of owner-occupied units is considered healthy. When there are not enough vacant units it becomes difficult for new residents to move into the community and for current residents to change housing as their needs change.

While citywide vacancy was at 5.7%, vacancy rates varied throughout the city. The darker shaded areas have higher vacancy rates, while the lighter shaded areas have lower vacancy rates. In most census tracts throughout the City vacancy rates are less than 6% with higher rates closer to the City center.

A few of the western tracts near the Garden of the Gods nature center have high vacancy rates (Census Tracts 08041003400 and 08041007900). Census tract 08041007000 neighboring the US Air Force Academy also has higher vacancy rates.

Source: 2013-2017 American Community Survey 5-Year Estimates



Need for Owner and Rental Rehabilitation

The City’s need for owner and rental rehabilitation is based on the age of a significant portion of both the rental and owner housing stock, the high number of owner and renter units at risk for lead exposure and occupied by families with children (see below), and the high number of renter and owner units identified as having one or more substandard conditions. According to the latest data, 42% of owner- occupied housing units and 47% of renter-occupied housing units were built before 1980, making up over 77,000 total homes in the city. In relation to older homes with families and children living in them, approximately 17% of owner-occupied housing (17,221) and 12% of renter-occupied housing (8,752) live in homes built before 1980 and had children under 6 years old.

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

To estimate the number of housing units in Colorado Springs occupied by low- or moderate-income families that may contain lead-based paint hazards, this report assumes that homes approximately 65% of older homes are occupied by LMI households. That means an estimated 50,000 LMI families live in a home built prior to 1980 that may have an LBP hazard.

In 2016, according to the state Environmental Public Health department, in El Paso County, 1.2% under the age of 6 years tested positive for elevated blood lead levels (16 out of 1,360 children). As Colorado Springs is 67% of the population of the county, it is assumed that the City's children will also test similarly for elevated blood lead levels at 1.2%. There are an estimated 34,930 children 6 years and under in the city, and taken the account of the children having a similar percentage with elevated blood lead levels, there is an estimated 420 children who may be affected by this environmental health issue. (Source: 2013-2017 ACS, B05009)

The highest risk areas, where there is a majority of older homes in LMI areas with the greatest number of young children are south of I-25 and in the eastside neighborhoods between Union Blvd and Circle Drive.

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

Introduction

Colorado Springs Housing Authority (CSHA) is the largest provider of affordable housing in Colorado Springs. As of 2nd quarter of 2019, CSHA's housing program currently has 5,796 units in the community. This includes:

- 2,290 Section 8 Vouchers
- 706 Public Housing Units
- 1,863 LIHTC Units
- 813 CSHA Owned/Managed Units
- 850 Down Payment Assistance Loans (124 still active)

In addition, CSHA offers low-cost nutritious lunches to low income seniors and disabled residents in CSHA-owned buildings and operates the Colorado Springs Senior Center.

The Colorado Springs Housing Authority (CSHA) is held to strict compliance and performance standards in the operation of our housing programs. Several of the most important indicators that are used to evaluate the CSHA are listed below:

PHAS (Public Housing Assessment System) measures the performance of a Housing Authority in the operation of the Public Housing Program. For the fiscal year 2018, the CSHA achieved a score of 93 out of 100 points.

SEMAP (Section Eight Management Assessment Program) measures the performance of a Housing Authority that administers the Housing Choice Voucher Program (Section 8) in 14 key areas. For the fiscal year 2018, the CSHA achieved a score of 104.

The CSHA utilized 95% of the total capacity for vouchers in 2018.

REAC (Real Estate Assessment Center) is the inspection process used in assessing the physical condition of properties in the Public Housing Program. The primary purpose of conducting inspections is to insure properties are maintained to HUD quality standards. Inspection scores for 2018 averaged 83% out of 100 points.

Annual Audit: For the fiscal year 2018, the CSHA received an "unmodified clean" audit report, meaning there were no audit findings and that the CSHA is considered a "low-risk" for concerns. This marks the sixth consecutive year the CSHA has achieved this rating.

Occupancy: The CSHA is required to maintain certain levels of tenant occupancy in units to meet optimum standards. For fiscal year 2018, the occupancy rate in the Public Housing Program was 99%. The occupancy rate in non-public housing programs was 95%. These rates are higher than the market as a whole and indicate strong performance.

(Note: The data presented below in the HUD-generated table provides different CSHA inventory numbers because it is referencing a different point in time and is not all-inclusive of CSHA’s inventory.)

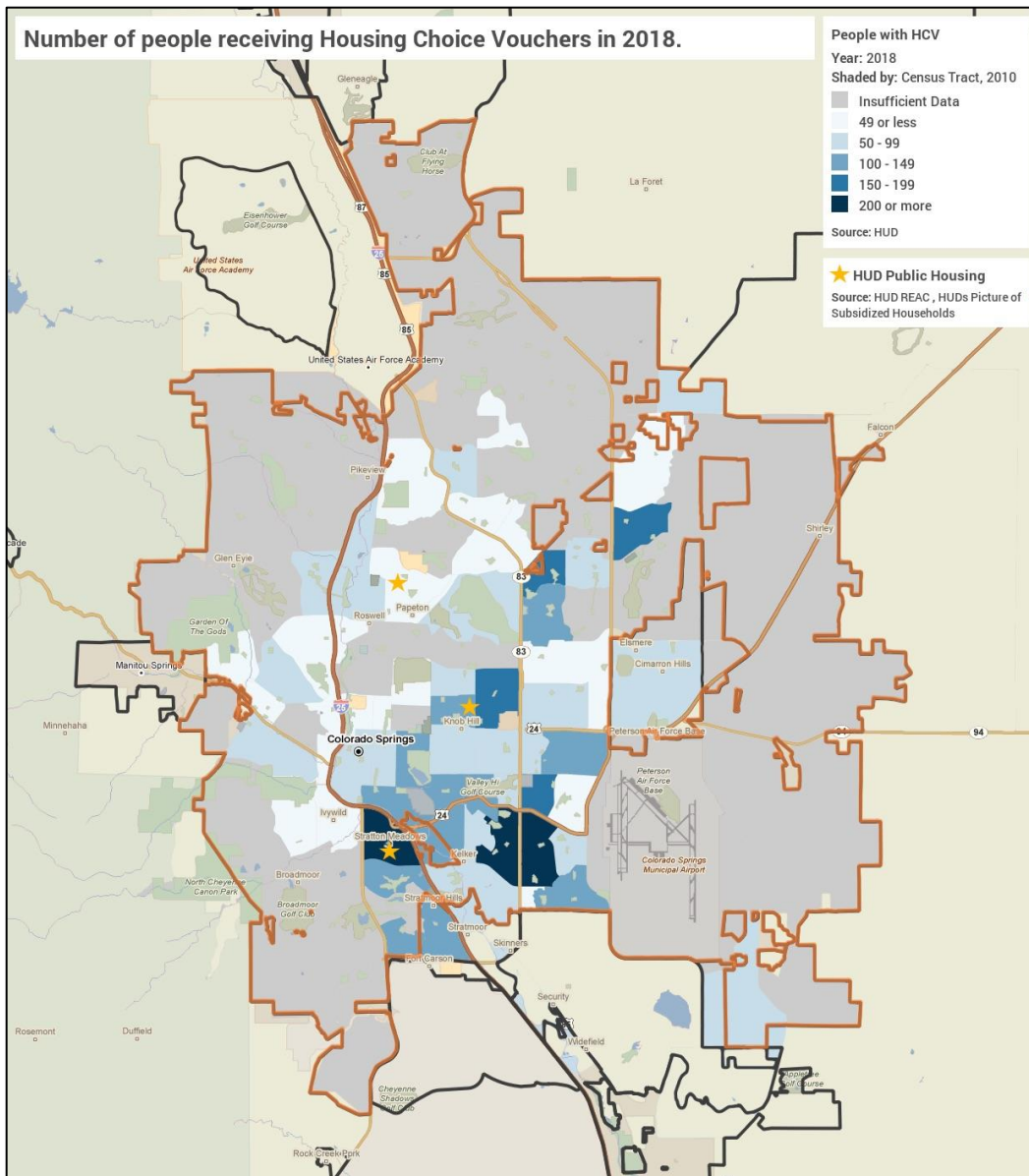
Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	36	706	2,149	28	2,130	14	0	0
# of accessible units			26						

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 35 – Total Number of Units by Program Type

Alternate Data Source Name:
PIC (PIH Information Center)



Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

CHSA has 706 units of public housing in the City. All of the units have proper kitchen and plumbing facilities and are occupied or ready to be occupied. The CSHA has three Asset Management Projects (AMPs) which comprise these 706 units. Out of 100 total points possible, the AMPs scored average to excellent in the most recent HUD Physical Inspections report in 2019. Below is a summary of each AMP:

- AMP 2, inspected on 1/4/2018, had a physical inspection score of 93.
- AMP 3, inspected on 2/1/2019, had a physical inspection score of 81.
- AMP 1, inspected on 2/5/2019, had a physical inspection score of 77.

Public Housing Condition

Public Housing Development	Average Inspection Score
1940 S El Paso Ave	93
915 Yuma St	81
1087 Westmoreland Rd	77

Table 36 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

HUD provides physical inspection scores for PHA developments across the country. The physical condition scoring process is based on three elements within the property, which are:

1. Inspectable areas: site, building exterior, building system, common areas and dwelling units;
2. Inspectable items: walls, kitchens, bathrooms and other things to be inspected in the inspectable area; and
3. Observed deficiencies.

A score of 55 or below means that the property is in poor condition, and properties in excellent condition have a score of 90 and over. As of February 2019, one development is rated excellent and two developments are considered acceptable.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

While there are currently no units in poor condition, maintaining UPCS quality standards continues to be a challenge. Efforts to improve the living environment for CSHA residents consist of routine maintenance and educating residents on proper maintenance. The City invests in rehabilitation of locally funded units operated by CSHA with CDBG funding. Capital Fund dollars are used to complete large renovation projects to improve the quality of the public housing stock. CSHA will continue to focus on general upkeep and renovation across the portfolio, with an emphasis on repairs/renovations, such as roof repair/replacement and water intrusion/drainage that preserve structural integrity.

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

Introduction

The Pikes Peak Continuum of Care completed its 2019 Point in Time and Housing Inventory Count on **January 27, 2019**. Throughout the winter 2018-2019, one low-barrier facility created more beds for unaccompanied adults. The subsequent PIT/HIC count in January showed an increase in sheltered persons and a decrease in unsheltered persons.

Throughout the previous consolidated planning period, the Division has invested in the low-barrier shelter model. The lack of affordable and permanent housing resources that shelter clients could access has kept clients in shelters for longer periods of time. Permanent supportive housing is a housing type that could help move the chronically homeless out of the shelters and streets.

The number of beds for families with children does not meet the need in Colorado Springs. This table includes the additional 20 single-occupancy family emergency shelter and 40 new transitional housing units in development by a local coalition of family service providers.

While there are seasonal beds that increase the number of shelter units during winter months, there is still a need of more emergency and transitional housing shelters. There is roughly only 800 emergency shelter and 450 transitional housing year-round beds in the City. The 2019 PIT Count reported just over 1,500 persons on a given night with about 1,100 being sheltered and 440 unsheltered. While the number of shelter beds was in line with the sheltered homeless persons count, there were still a significant number of unsheltered homeless persons in need of shelter.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	159	0	283	294	80
Households with Only Adults	650	31	168	332	0
Chronically Homeless Households	0	0	0	0	65
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 37 - Facilities and Housing Targeted to Homeless Households

Alternate Data Source Name:
2019 Housing Inventory Count CO-504

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

There is considerable collaboration among Colorado Springs service providers serving youth, families, veterans and adults. Many agencies offer wraparound services for their populations.

- The low-barrier shelter in downtown Colorado Springs features a resource center offering space to third party providers, like health care workers, dental care specialists, and counselors.
- The local veteran-serving agency, Rocky Mountain Human Services, conducts outreach, case work, housing navigation, and referrals for employment services, legal aid, and mental health and substance abuse treatments.
- The City’s homelessness prevention and response coordinator is working with local service providers to design and fund a work program for homeless shelter clients
- Family service providers routinely provide referrals for medical care, employment services, legal aid, and mental health and substance abuse treatment.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Adults

- Springs Rescue Mission
- Salvation Army – RJ Montgomery Center
- Homeward Pikes Peak
- Ascending to Health
- Ithaka Land Trust

Families with Children

- Catholic Charities – Marian House Soup Kitchen, Family Day Center
- Family Promise
- Partners in Housing
- Mary's Home
- Family Life Services
- TESSA
- Colorado Springs Housing Authority

Unaccompanied Youth

- Urban Peak

Veterans

- Rocky Mountain Human Services

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

Introduction

There are four primary groups with non-homeless special needs in the jurisdiction. They are the elderly and frail elderly, those with HIV/AIDS and their families, those with alcohol and/or drug addiction, and the mentally or physically disabled. This section will explain who they are, what their needs are, and how the jurisdiction is accommodating (or should accommodate) those needs.

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

Elderly: The supportive housing needs for this population can vary widely depending on the health and fitness of the individuals. In general, with aging disabilities and other health issues become more common. Because of this, supportive housing must include access to health professionals and housing modifications to assist the resident. It is important to help residents stay independent and in their own homes for as long as possible if they prefer that.

HIV/AIDS: Medical and social support is important for residents living with HIV/AIDS. While there have been great advances in the medical treatment of HIV/AIDS, it is still important to provide specialized support. Family and friends must be accessible and medical facilities should be nearby.

Alcohol and/or Drug Addiction: Individuals dealing with addiction often require housing options that will provide a safe, sober place for recovery. A strong network is necessary to maximize the chance they will stay healthy and sober. It is important that these persons have access to health services, support groups, employment assistance, and access to family and friends. Additionally, detoxification facilities are necessary when addiction is first recognized.

Mental and Physical Disabilities: Individuals with disabilities encompass a wide range of skill levels and abilities. They have many of the same housing issues as the general population with the added needs that are unique to their situation. Individuals with disabilities have a fixed income and limited housing options. Individuals with more independent skills can utilize subsidized housing but individuals that need more support or specialized housing have fewer options. Many individuals continue to reside with parents and families throughout adulthood, which can put additional financial burden on the family. Regardless of the housing situation, a common thread is the need for continuous support services dependent on the level of capabilities.

The specific needs of local special needs subpopulations are described in NA-45, Non-Homeless Special Needs Assessment.

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

State discharge policy for mental health organizations prevents discharging persons to homelessness. The regional CoC abides by the State protocol, participates in quarterly system and policy review meetings. Local providers have guidelines based on state policies on admission, care, and discharge of clients.

AspenPointe works with El Paso County jail to reach inmates suffering from mental illness and provide discharge planning. This reduces recidivism by ensuring services are available on release (clinical care, access to mainstream benefits, housing, and vocational training). AspenPointe and clients call 211 for referrals to appropriate services. If people with mental health issues become homeless, the Springs Rescue Mission Resource Advocacy Program and City of Colorado Springs Homeless Outreach Team connect them to available resources. Destinations include: AspenPointe Health Services; Ecumenical Social Ministries; Beth Haven; and Fort Lyon.

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

The City of Colorado Springs will provide for supportive services targeting the non-homeless special needs community in the City. One of the priority needs identified by the City is the need for Public Services & Quality of Life Improvements, which targets low- and moderate-income households as well as the special needs population. The following goal is provided to address this need:

3A. Provide Supportive Services for Special Needs

Activities targeting special needs populations will improve the quality of life for persons with a disability and for persons who are elderly. These activities are described in AP-35 Projects under CDBG: Public Services.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

See response to prior question.

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City is in the process of updating its Analysis of Impediments to Fair Housing Choice. Once this update is completed, this section of the Consolidated Plan will also be updated.

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

Introduction

There are many factors within a community that can impact housing supply and demand. The economic development of the community can play a major role in what type of home a household needs and what they can afford. The presence (or lack thereof) of specific industries can also decrease or increase affordability in a community. Throughout this section a variety of economic indicators will be described and analyzed. This will include business activity, labor force participation, travel time, education, and veterans.

Economic Development Market Analysis

In the City of Colorado Springs there are approximately 206,520 jobs and 204,138 workers. Overall, the job availability matches the workers relatively well. The largest disconnect is in the Professional, Scientific, Management Services sector, which also happens to be the second largest job producer in the City. In that sector there are over 10,000 more jobs than workers. The largest job producer is the Education and Health Care Services and the third largest is Arts, Entertainment and Accommodations.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	1,339	141	1	0	-1
Arts, Entertainment, Accommodations	23,681	27,149	12	13	1
Construction	13,426	9,318	7	5	-2
Education and Health Care Services	45,537	49,680	22	24	2
Finance, Insurance, and Real Estate	14,184	15,176	7	7	0
Information	5,992	8,111	3	4	1
Manufacturing	13,288	10,221	7	5	-2
Other Services	13,159	8,576	6	4	-2
Professional, Scientific, Management Services	26,401	37,020	13	18	5
Public Administration	12,487	6,242	6	3	-3
Retail Trade	23,126	25,675	11	12	1
Transportation and Warehousing	7,419	5,052	4	2	-2
Wholesale Trade	4,099	4,159	2	2	0
Total	204,138	206,520	--	--	--

Table 38 - Business Activity

Alternate Data Source Name:
2011-2015 ACS (Workers), 2015 LEHD (Jobs)

**Data Source
Comments:**

The default data provided by HUD for the table above is from the 2011-2015 American Community Survey (ACS) for the number of workers and the 2015 US Census Longitudinal Employer-Household Dynamics (LEHD) data set for the number of jobs in Colorado Springs. As the most recent LEHD is from 2015, to maintain time period consistency, the 2011-2015 was used for comparative purposes. Column descriptions: Number of Workers: This column is the number of workers employed by industry in the city. Number of Jobs: This column is the number of jobs for each industry in the city. Share of Workers %: This column shows the industry % share of workers from the total number of workers employed in the city. Share of Jobs %: This column shows the industry % share of jobs from the total number of jobs in the city. Jobs less workers %: This column show the difference between the % share of workers and % share of jobs. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Please refer to the American FactFinder website <https://factfinder.census.gov/> for more about MOE.

Labor Force

Total Population in the Civilian Labor Force	234,693
Civilian Employed Population 16 years and over	225,603
Unemployment Rate	3.90
Unemployment Rate for Ages 16-24	17.40
Unemployment Rate for Ages 25-65	5.20

Table 39 - Labor Force

Alternate Data Source Name:
2013-2017 ACS 5-Yr Estimates

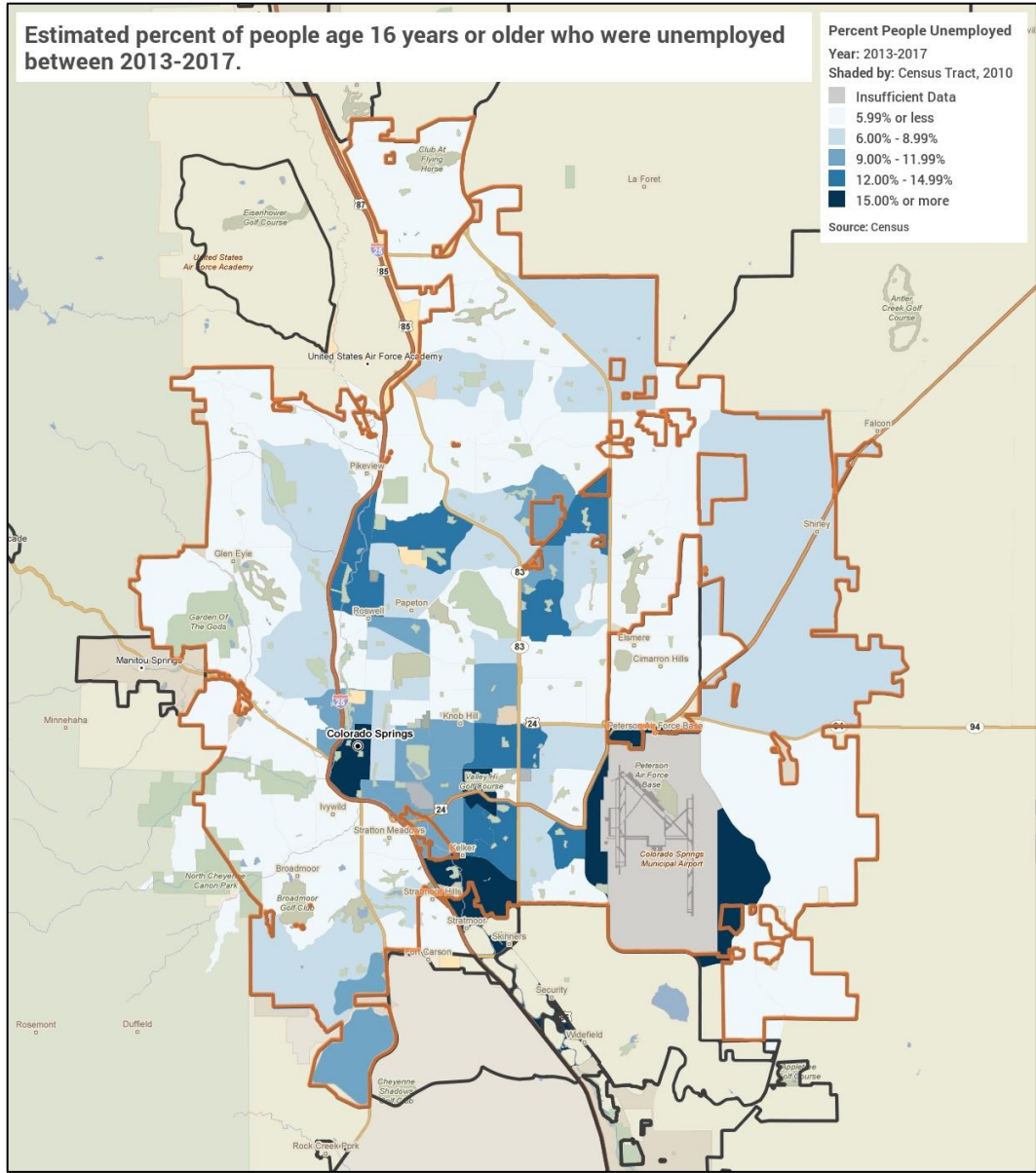
Data Source Comments: For Total Population in the Civilian Labor Force, Civilian Employed and Unemployment Rate the data is from the US Department Bureau of Labor Statistics. Annual averages have been updated only up to 2018 (Not seasonally adjusted). For Unemployment Rate for Ages 16-24 & 25-65 the data is from the most up to date ACS 2013-2017 Estimates. The default data provided by HUD for the Consolidated Plan is from the 2011-2015 American Community Survey (ACS). This satisfies HUDs requirement for the data as its purpose is to provide a picture of the conditions and trends within the city, however where possible data was replaced with the most up to date 2013-2017 ACS. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Please refer to the American FactFinder website <https://factfinder.census.gov/> for more about MOE.

Unemployment

The US Bureau of Labor Statistics (BLS) regularly gathers and reports on unemployment. The BLS rate is considered more accurate than the ACS rate, but it has some limitations. Specifically, BLS does not break unemployment rate by census tract, nor does it allow for analysis by age group. In this section, the ACS unemployment rate will be used to conduct a more thorough analysis.

In Colorado Springs, the youth unemployment rate (ages 16-24) is over three times that of the adult rate. Over 9,000 City residents are currently in the labor force but looking for work, or 3.9% of civilian labor force.

The map below shows the distribution of unemployed persons throughout the City using ACS data. The lighter shaded areas are where unemployment is lowest, and the darker shaded areas are where unemployment is highest. Several tracts in the city center and around the airport have an unemployment rate of over 15% - the darkest shaded color.



Occupations by Sector	Number of People
Management, business and financial	87,406
Farming, fisheries and forestry occupations	310
Service	40,221
Sales and office	50,830
Construction, extraction, maintenance and repair	16,177
Production, transportation and material moving	16,973

Table 40 – Occupations by Sector

Alternate Data Source Name:
2013-2017 ACS 5-Yr Estimates

Data Source Comments: The default data provided by HUD for the Consolidated Plan is from the 2011-2015 American Community Survey (ACS). This satisfies HUDs requirement for the data as its purpose is to provide a picture of the conditions and trends within the city, however where possible data was replaced with the most up to date 2013-2017 ACS. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Please refer to the American FactFinder website <https://factfinder.census.gov/> for more about MOE.

Occupations by Sector

The largest employment sector is the management, business and financial sector, employing 87,406 persons throughout the City. This employment sector consists of jobs in a wide range of areas such as business and financial operations, computer, engineering and science occupations, educational and legal services occupations, arts, design and entertainment occupations and healthcare practitioner/technician occupations.

The sales and office sector are the second largest sector in the city with 50,830 persons employed. The sales and office sector consist of jobs in retail and other sales related occupations and office and administrative support occupations. The service sector is the third largest sector with 40,221 employees and consists of jobs in healthcare support, law enforcement, firefighting and prevention, food preparation and serving, personal care and service occupations and building and grounds cleaning and maintenance occupations.

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	158,354	77%
30-59 Minutes	37,634	18%
60 or More Minutes	9,666	5%
Total	205,654	100%

Table 41 - Travel Time

Alternate Data Source Name:
2013-2017 ACS 5-Yr Estimates

Data Source Comments: The default data provided by HUD for the Consolidated Plan is from the 2011-2015 American Community Survey (ACS). This satisfies HUDs requirement for the data as its purpose is to provide a picture of the conditions and trends within the city, however where possible data was replaced with the most up to date 2013-2017 ACS. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Please refer to the American FactFinder website <https://factfinder.census.gov/> for more about MOE.

Commute Travel Time

Long commutes can have a negative impact on a person’s health and overall well-being. Research by Texas A&M Transportation Institute estimates that each year there is over \$100 billion in lost time and wasted fuel in the United States. Long commute times have been linked to an increase in domestic violence, high blood pressure and blood sugar, and increased obesity.

In Colorado Springs long commute times are not a significant issue. Seventy-seven percent of all persons commuting to work have a commute of less than 30 minutes each way. Approximately 5% of all employed persons have a commute of 60 minutes or more, to and from work each day. Tracts with relatively more people with long commute times are found near the center of the City, as well as along the outskirts.

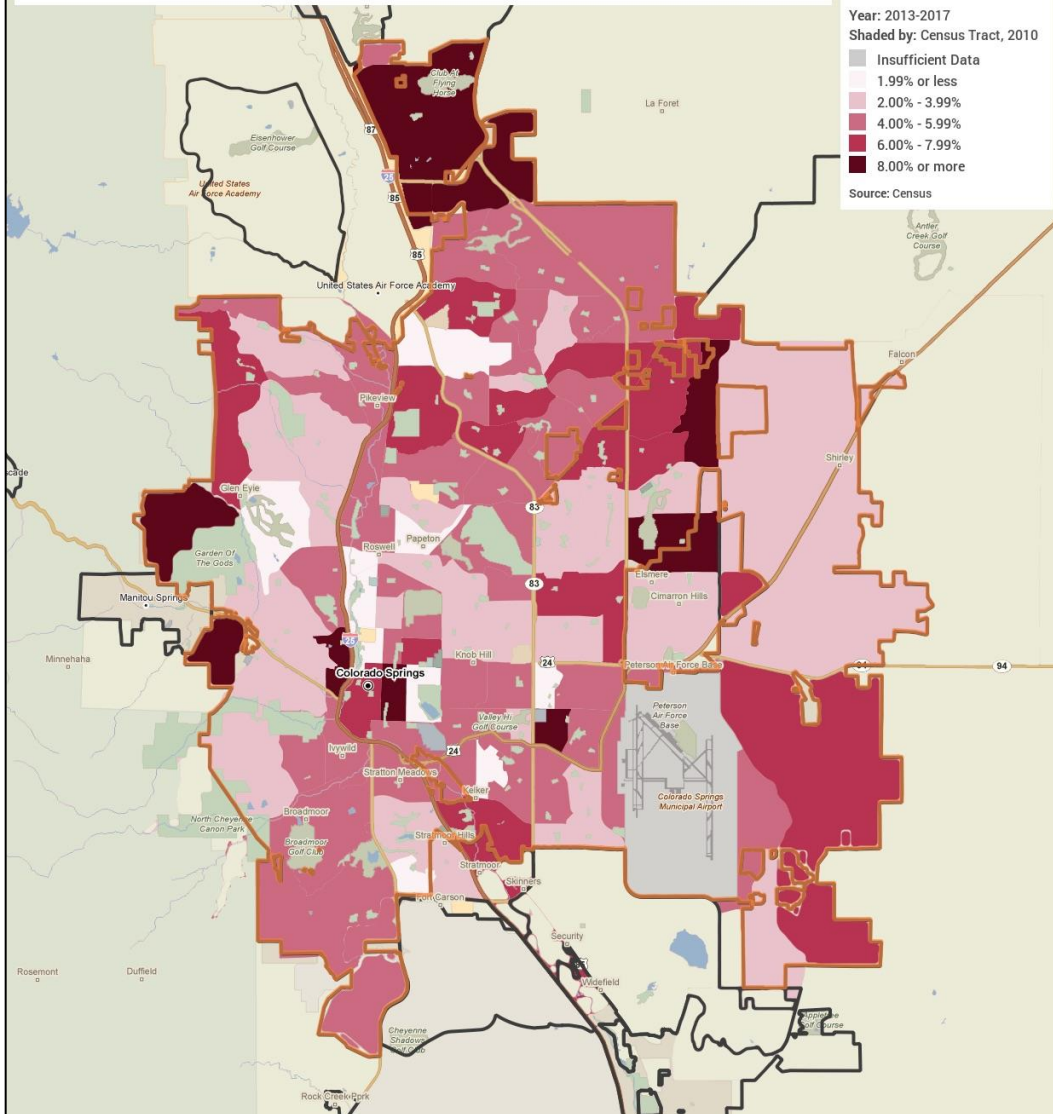
Source: 2013-2017 American Community Survey 5-Year Estimates

Estimated percent of workers with a work commute of more than an hour in 2013-2017.

Percent Workers with Commute of More than 1 Hour
 Year: 2013-2017
 Shaded by: Census Tract, 2010

- Insufficient Data
- 1.99% or less
- 2.00% - 3.99%
- 4.00% - 5.99%
- 6.00% - 7.99%
- 8.00% or more

Source: Census



Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	8,408	1,428	5,246
High school graduate (includes equivalency)	29,332	3,082	11,847
Some college or associate degree	60,222	4,969	18,161
Bachelor's degree or higher	72,061	2,960	14,431

Table 42 - Educational Attainment by Employment Status

Alternate Data Source Name:
2013-2017 ACS 5-Yr Estimates

Data Source Comments: The default data provided by HUD for the Consolidated Plan is from the 2011-2015 American Community Survey (ACS). This satisfies HUDs requirement for the data as its purpose is to provide a picture of the conditions and trends within the city, however where possible data was replaced with the most up to date 2013-2017 ACS. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Please refer to the American FactFinder website <https://factfinder.census.gov/> for more about MOE.

The table above details educational attainment by employment status for persons 16 years of age and older within the City. Unemployment is lower and labor force participation is generally higher for residents who have achieved a higher level of educational attainment.

Educational Attainment by Age

	Age				
	18–24 yrs.	25–34 yrs.	35–44 yrs.	45–65 yrs.	65+ yrs.
Less than 9th grade	457	1,422	1,693	1,984	1,791
9th to 12th grade, no diploma	5,060	3,529	2,950	2,994	3,562
High school graduate, GED, or alternative	14,947	14,434	8,418	21,190	13,581
Some college, no degree	20,736	20,061	13,166	25,600	13,612
Associate's degree	2,387	8,653	6,378	11,806	4,226
Bachelor's degree	5,336	17,720	14,864	25,310	10,967
Graduate or professional degree	122	5,973	9,038	1,600	9,529

Table 43 - Educational Attainment by Age

Alternate Data Source Name:
2013-2017 ACS 5-Yr Estimates

Data Source Comments: The default data provided by HUD for the Consolidated Plan is from the 2011-2015 American Community Survey (ACS). This satisfies HUDs requirement for the data as its purpose is to provide a picture of the conditions and trends within the city, however where possible data was replaced with the most up to date 2013-2017 ACS. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Please refer to the American FactFinder website <https://factfinder.census.gov/> for more about MOE.

The table above details educational attainment by age for persons 18 years of age and older within the City. As expected, older residents tend to have a higher level of education than younger residents. However, there is still a significant number of people who are older and lack even a high school diploma. There are nearly 20,000 people over the age of 25 that don't have a high school diploma or equivalent.

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	20,740
High school graduate (includes equivalency)	27,736
Some college or Associate's degree	33,067
Bachelor's degree	46,782
Graduate or professional degree	65,654

Table 44 – Median Earnings in the Past 12 Months

Alternate Data Source Name:
2013-2017 ACS 5-Yr Estimates

Data Source Comments: The default data provided by HUD for the Consolidated Plan is from the 2011-2015 American Community Survey (ACS). This satisfies HUDs requirement for the data as its purpose is to provide a picture of the conditions and trends within the city, however where possible data was replaced with the most up to date 2013-2017 ACS. Data from the ACS is based on a sample and subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error (MOE). Please refer to the American FactFinder website <https://factfinder.census.gov/> for more about MOE.

Median Earnings by Educational Attainment

Educational advancement is one of the primary indicators of a person's potential earnings and financial stability. A person's median earnings increase significantly as they attain higher education. For example, in Colorado Springs a person with a Bachelor's degree can expect to earn over twice that of a person without a high school degree. A person with a graduate or professional degree can expect to earn more than twice somebody with only a high school degree.

This difference in earnings results in a significant increase in wealth over an entire career. A person with a Bachelor's degree working from age 23 to 62 will earn approximately \$1,824,498 and a person with only a high school diploma who works from the age 18 to 62 will earn \$1,220,384. That is over \$600,000 more for the Bachelor's degree from earnings alone and does not factor in increases in wealth that comes from the greater likelihood of home ownership, investments, and retirement accounts that often come with a higher salary.

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

The major employment sectors within the City and their shares of the jobs are Education and Health Services (24%); Professional, Scientific, Management Services (18%), and Arts, Entertainment and Accommodation (13%).

According to the UCCS Economic Forum in 2019, sixteen industry sectors saw job gains in El Paso County with the most significant gains coming from healthcare and social services with 1,771 jobs and professional and technical services with 1,745 jobs. These two business industry sectors accounted for 63.1% of the total job gains in the county.

There is a wide variety of private and public employers that play a major role in the economy. Colorado College, Cherwell Software, EviCore, Peak Vista Community Health Centers, Western Forge Corporation, Peterson Air Force Base, Progressive Insurance Company, and many others operate out of the area. The Colorado Springs region is home to more than 30 Fortune 500 firms and five military installations.

Describe the workforce and infrastructure needs of the business community:

Colorado Springs is enjoying a strong economy after a long recovery process from the recession. Unemployment in the region has improved since the last Consolidated Plan in 2015 and now outperforms the national rate, but it remains higher than the state unemployment rate.

Small business surveys in the region show a need for qualified workers. Public feedback in the Consolidated Plan public hearings echo that need from the worker side – workforce training and education/certification programs are well-received in the community as critical to finding higher wage employment. Local economic development planners state a need for reducing barriers to capital, technical assistance and social support among more vulnerable communities seeking pathways to entrepreneurship. As Colorado Springs now finds itself on many high-profile lists of desirable cities, the housing stock needs to keep pace with the demand. Pikes Peak Regional Building Department Data show that 2019 residential building permits are down from 2018 and remain below what University of Colorado at Colorado Springs economists consider a healthy equilibrium.

In addition to the general infrastructure needs of the City (e.g., roads, bridges, water and sewer lines, etc.), the business community needs continual updates and improvements of the electronic and wireless infrastructure required by innovative and cutting-edge industries.

A major problem for Colorado Springs is that the growth in median household income has not kept pace with the cost of living. The average wage in El Paso County remains lower than the Colorado average. The 2017 median household income of \$58,244 represents a 6.4% decline in real income from 2000. Along with rising housing costs, this indicates declining purchase power that reduces housing choice. This is part

of a national trend, but Colorado Springs is particularly vulnerable due to the high risk of outsourcing in high-tech and information technology sectors.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

PlanCOS, the City of Colorado Springs Comprehensive Plan, identified three key strategies to create “an environment of inclusivity and economic diversity”. These strategies are:

- 1) Nurture cornerstone institutions, target industries, spinoffs, startups, and entrepreneurship
- 2) Expand high-quality infrastructure and technology
- 3) Create amenities to attract new business and residents

The goals and policies established to address these strategies include improving the branding of the City, expanding the base of businesses, focusing on regional coordination, embracing sustainability, and becoming a smart cities leader. A series of plans has been adopted including an Airport Master Plan, Experience Downtown Master Plan, Envision Shook’s Run Plan, and the anticipated SmartCOS Plan.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

According to the UCCS Economic Forum, by 2020, 74% of the jobs in the state will require some form of postsecondary education. Currently, Colorado Springs is positioned well as 39% of its population age 25 years and over have attained a Bachelor’s degree or higher – comparable to the state (41.2%) and much higher than the country as a whole (32%). (Source: UCCS Economic Forum, 2018)

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The Pikes Peak Workforce Center supports workforce development within the City. The Pikes Peak Workforce Investment Board organizes a comprehensive, community-wide response to the challenges of building a highly skilled workforce and links efforts to the broader economic and political goals of the Pikes Peak Region. The Board is dedicated to improving performance of regional businesses through long-term development of a job-ready and skilled workforce. Board direction ensures that the Pikes Peak Region is a community where a skilled and educated workforce is a key asset in attracting and retaining businesses. The Center offers many services for job seekers including automatic job matching from a statewide database, an on-site resource room with computers, fax machines, telephones and copy machines,

various networking groups for job seekers of all skill levels, on-site job fairs and hiring events and workshops ranging from learning new computer skills to writing a new resume. All services are free of charge and any citizen 14 and older is eligible.

Pikes Peak Community College offers a workforce development program with internship connections, employee training, special certification for construction and other vocational trades, and community classes. These initiatives are designed to serve the needs of local employers and foster local economic development.

The Independence Center offers an award-winning Certified Nurse Aide (CNA) training program approved by the Colorado State Board of Nursing to develop qualified health care workers.

Since 2014, the Housing and Building Association of Colorado Springs has run the Careers in Construction program, partnering with local school districts, industry leaders, and various trades organizations to train high school students and prepare them for immediate employment or enrollment in a trade school.

The University of Colorado at Colorado Springs (UCCS) created a Workforce Asset Map in 2017 to help job seekers and employers connect, as well as provide development tools for all participants. The tool is supported by a number of higher education and industry organizations, as well as a local school district, via its Career Readiness Academy. UCCS is working with the community to audit the number of graduates in various fields and the number of jobs demanded in those fields to assess whether local training institutions are training a sufficient number of people for the highest demand occupations.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City has considered when preparing this Consolidated Plan several local community and economic development plans. These plans are listed below:

Mill Street Neighborhood Plan: The 2019 Mill Street Neighborhood Plan is to strengthen the historic downtown neighborhood by increasing economic, cultural, and physical resilience. CDBG and HOME-friendly strategies are planned prevent displacement and improve neighborhood conditions.

PlanCOS: The plan outlines key economic development strategies in the City. They are to 1.) Nurture cornerstone institutions, target industries, spinoffs, startups, and entrepreneurship, 2.) Expand high-quality infrastructure and technology, and 3.) Create amenities to attract new business and residents

Colorado Springs AI: The AI has strategies to combat concentrations of poverty and economic and racial segregation.

MA-50 Needs and Market Analysis Discussion

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

HUD identifies four specific data points that constitute "housing problems": cost burden, overcrowding, lack of complete plumbing facilities, and lack of complete kitchen facilities. Within the City, 0.3% of occupied units lack complete plumbing, 0.7% occupied units lack complete kitchen facilities, 2.9% are overcrowded, and 34.8% are cost burdened. Areas of concentration are census tracts that have two or more housing problems that are substantially higher than the City average. For this analysis, "substantially higher" means a lack of complete plumbing over 5.3%, a lack of complete kitchen facilities over 5.7%, overcrowding over 7.9%, or cost burden over 44.8%.

There are nine census tracts where multiple housing problems were concentrated:

08041002101: Lack of Complete Kitchen (9.3%), Cost Burden (55.8%)

08041002300: Lack of Complete Kitchen (5.9%), Cost Burden (55.8%)

08041004009: Overcrowding (15.2%), Cost Burden (45.9%)

08041005201: Overcrowding (15.8%), Cost Burden (47.9%)

08041005300: Overcrowding (10.6%), Cost Burden (48.7%)

08041005400: Overcrowding (10.0%), Cost Burden (48.2%)

08041006100: Overcrowding (14.0%), Cost Burden (46.9%)

08041006200: Overcrowding (11.4%), Cost Burden (49.1%)

08041006302: Lack of Complete Kitchen (6.2%), Cost Burden (52.8%)

See map below in this section:

Census Tracts with Multiple Housing Problems

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

Yes, there are several areas with a concentration of racial minorities, ethnic minorities, or low-income families. For the purposes of this analysis a "concentration" is any census tract where the minority or low-income population makes up 10% or more above the citywide average. Maps of these concentrations follow this section.

Black Households: In Colorado Springs, 6.36% of the population is Black but there are several tracts where the Black population is over 16.36%. This concentration is primarily around the airport in the southeastern part of the City.

Some Other Race: Residents who choose the “some other race” option on the American Community Survey made up 6.54% of the City’s population. There are several tracts where this group makes up 16.54% or more.

Two or More Races: Multiracial residents make up 5.62% of the population and there is one census tract with a concentration of this group. Tract 08041006100, located west of the airport, has a multiracial population of 15.7%.

Hispanic: Hispanic residents make up the largest non-white population in Colorado Springs. Approximately 17.62% of the population identifies as Hispanic. There are two areas of the City with a concentration of Hispanic households. Multiple tracts to the east and south of the central part of the City have a concentrated number of Hispanic households. There are also two tracts to the north of the downtown area that has a concentration of Hispanic households.

Low-Income Households: According to the 2013-2017 ACS, the Median Household Income in the City is \$58,158. Any household making 80% or less (\$46,526) is considered “low-income” and any tract with a Median Household Income of \$46,526 or less is a concentration. Low-income households are heavily concentrated in the outer census tracts of the City. (Source: 2013-2017 ACS)

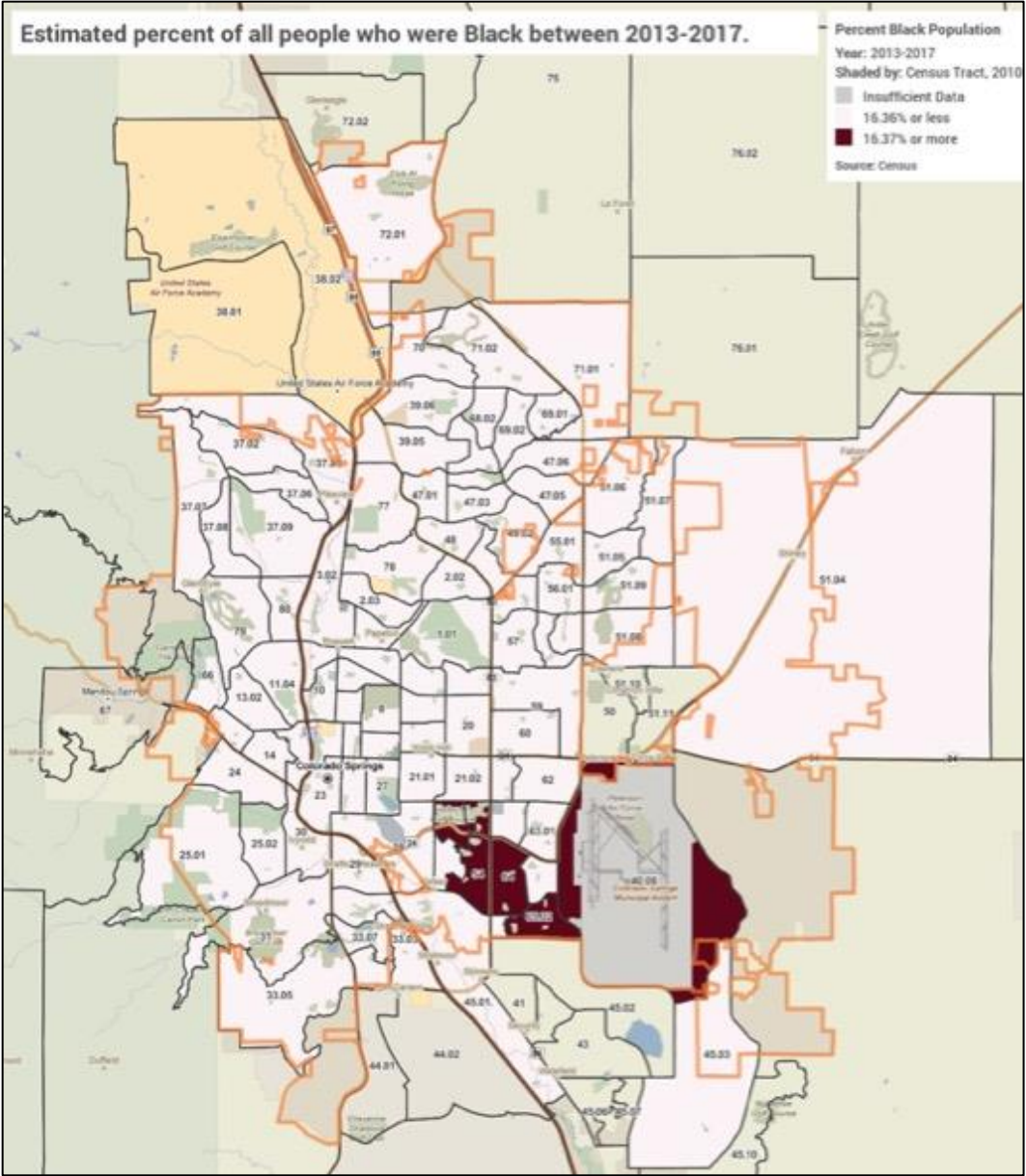
What are the characteristics of the market in these areas/neighborhoods?

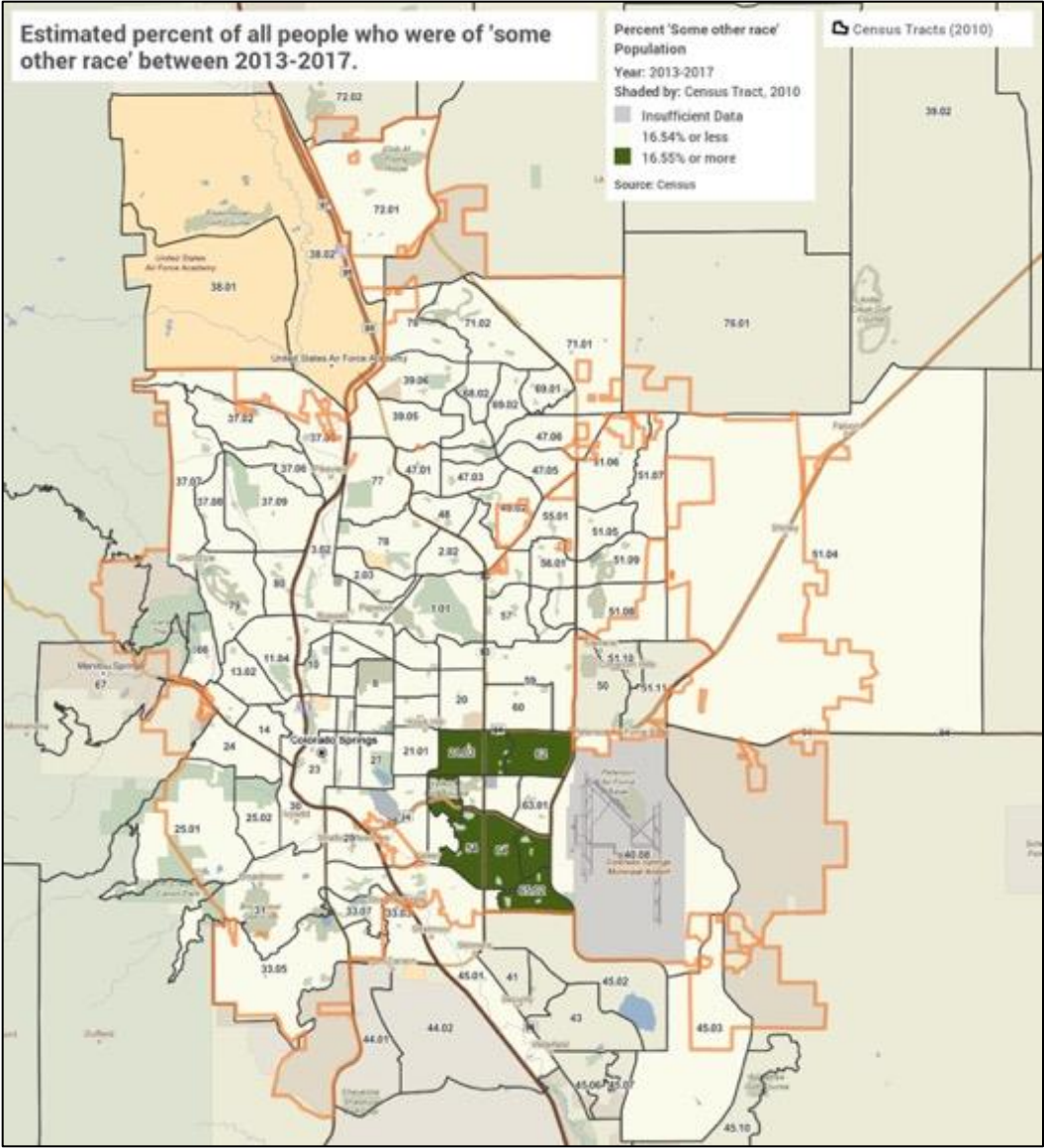
The housing market has lower sales prices areas compared to some of the neighborhoods in Colorado Springs. While some of the areas have experienced an increase in housing demand and housing prices, these tend to be concentrated in small pockets close to locations of recent investment. There are higher levels of low- and moderate-income residents in this area.

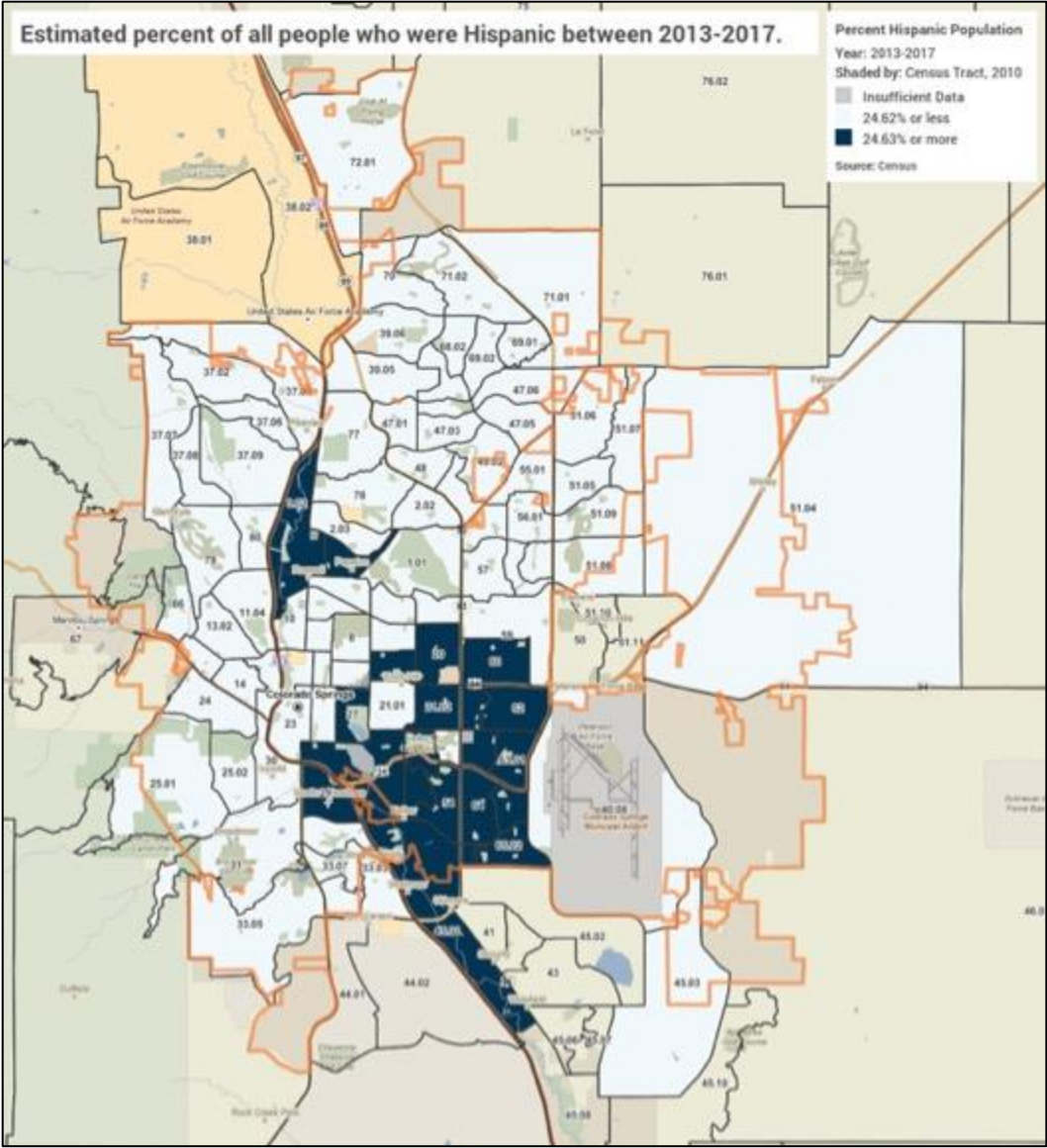
See maps below in this section:

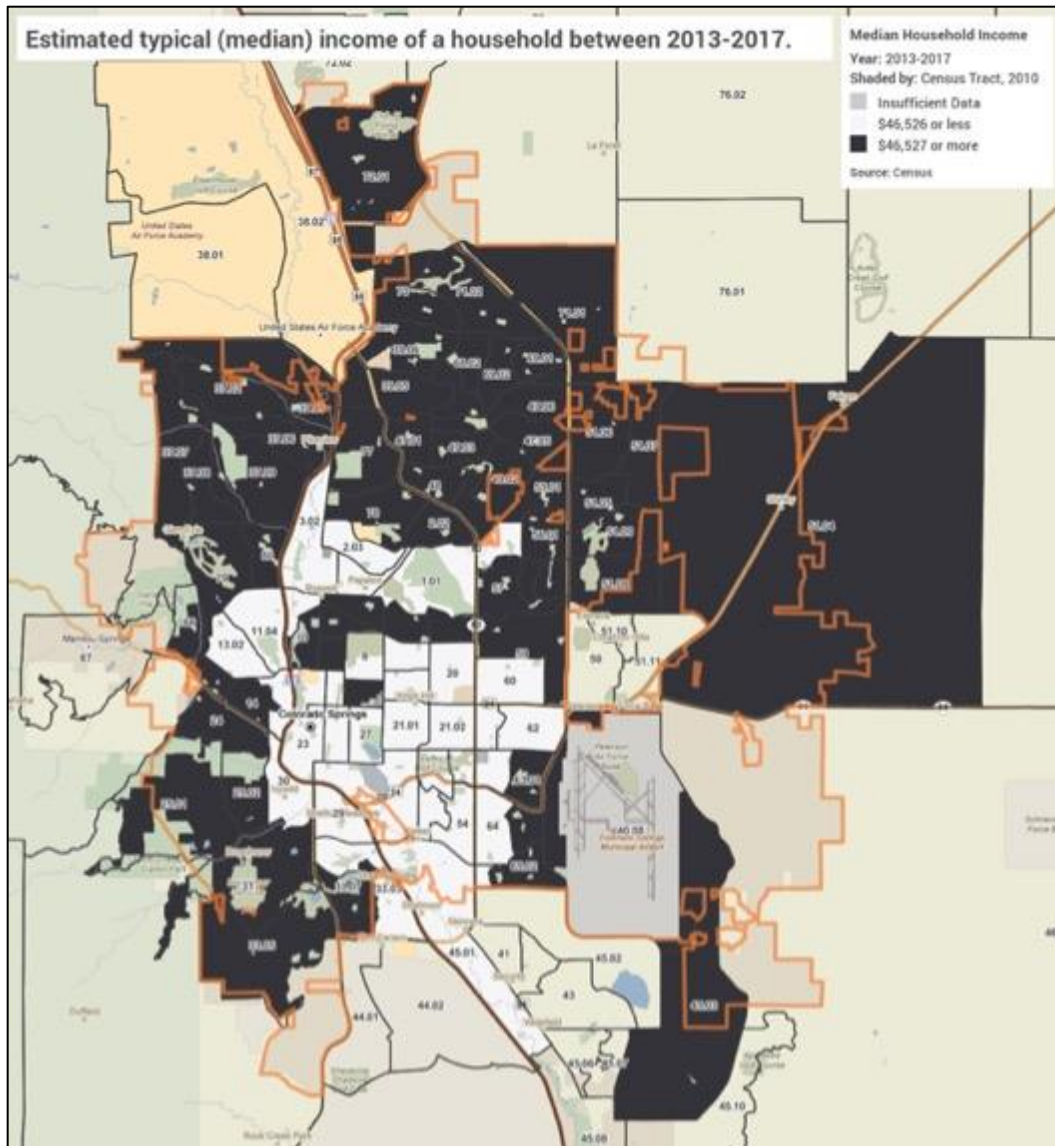
Are there other strategic opportunities in any of these areas?

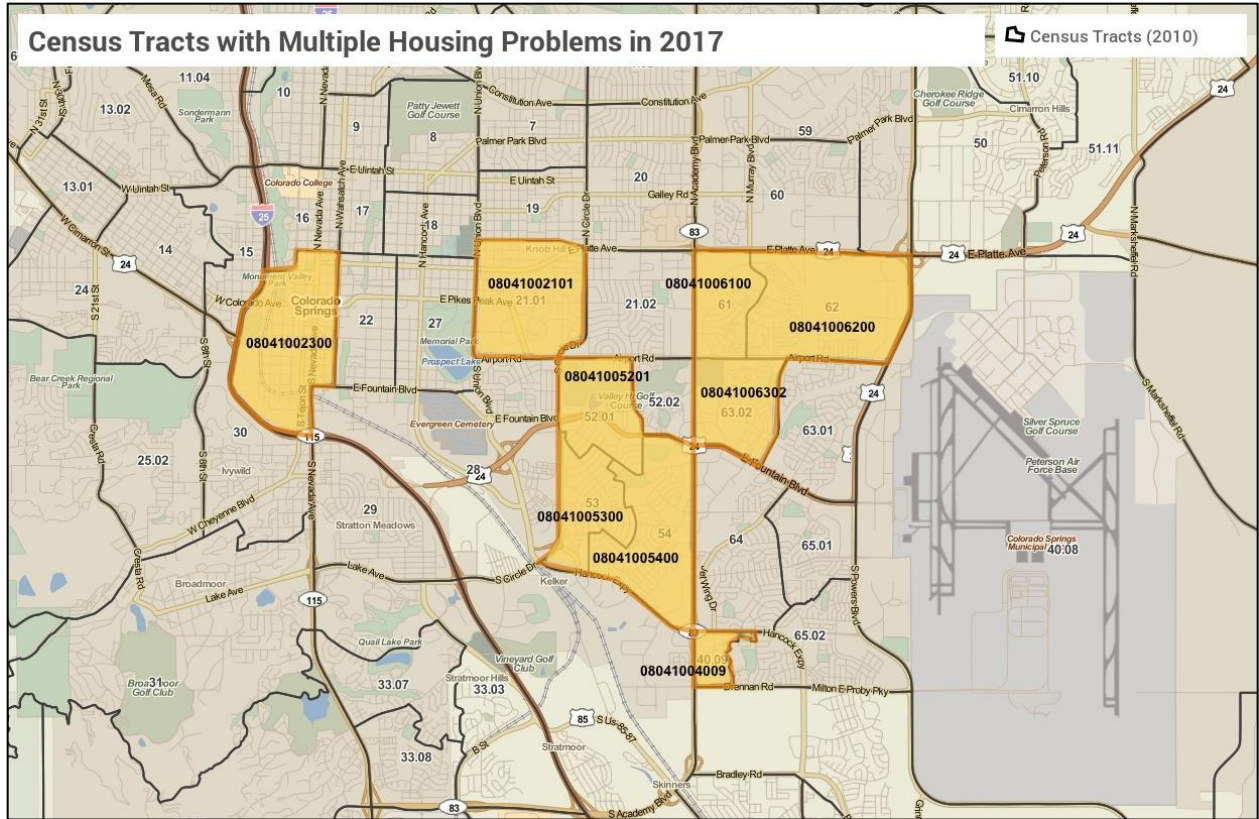
There are revitalization projects planned or happening along North and South Nevada, close to I-25, and along South Academy Boulevard. These projects will bring major employment, housing, retail and recreational opportunities to these neighborhoods, but the risk of displacement and/or rising housing costs is always present with revitalization projects. This is a good opportunity for the Community Development Division to get involved with these planning efforts and partner with developers to keep as many residents stably housed and also create affordable housing and mixed income and mixed-use projects to keep these areas accessible to all.











Census Tracts with Multiple Housing Problems

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Internet is an essential communications and information platform that allows users to take advantage of the increased interconnectedness of business, education, commerce, and day to day utility. Reliable access to the internet is becoming a necessity to thrive in the modern economic environment. Communities that lack broadband access struggle to keep pace with the country. Locations without broadband access impedes its population's ability to take advantage of the educational and entrepreneurial opportunities available online. This is particularly problematic for LMI areas where economic opportunities are already often lacking. Studies suggest a strong correlation between increased high-speed internet access and increased education and employment opportunities, especially in small cities and rural areas.

Colorado Springs does not have significant gaps in broadband coverage. Most of the city has multiple options of internet providers, to include LMI areas. The average Colorado Springs household has two (2) options for broadband-quality Internet service; however, an estimated two percent (2%) of locals still don't have access to more than one provider and may have to rely on low-grade wireless.

The following map shows broadband access throughout the City. Broadband access is defined as advertised internet speeds of 768 kilobits per second or higher. FCC data shows five major infrastructure options within Colorado Springs: cable, DSL, fiber, fixed wireless, and copper.

See map: Broadband Access

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Once broadband access has been obtained, it is important to ensure there is competition among service providers. Any single provider that has a de facto monopoly on an area may not be incentivized to provide standard and consistent services. Colorado Springs has a total of eight (8) Internet providers offering residential service. Century Link (DSL) and Xfinity (Cable) are the strongest providers in Colorado Springs so far as coverage. The average Colorado Springs household has two (2) options for broadband-quality Internet service. These providers frequently overlap around the city:

CenturyLink (DSL, fiber, and copper)

Xfinity (Cable)

Rise Broadband (fixed wireless)

PCI Broadband (fixed wireless)

Peak Internet (fixed wireless)

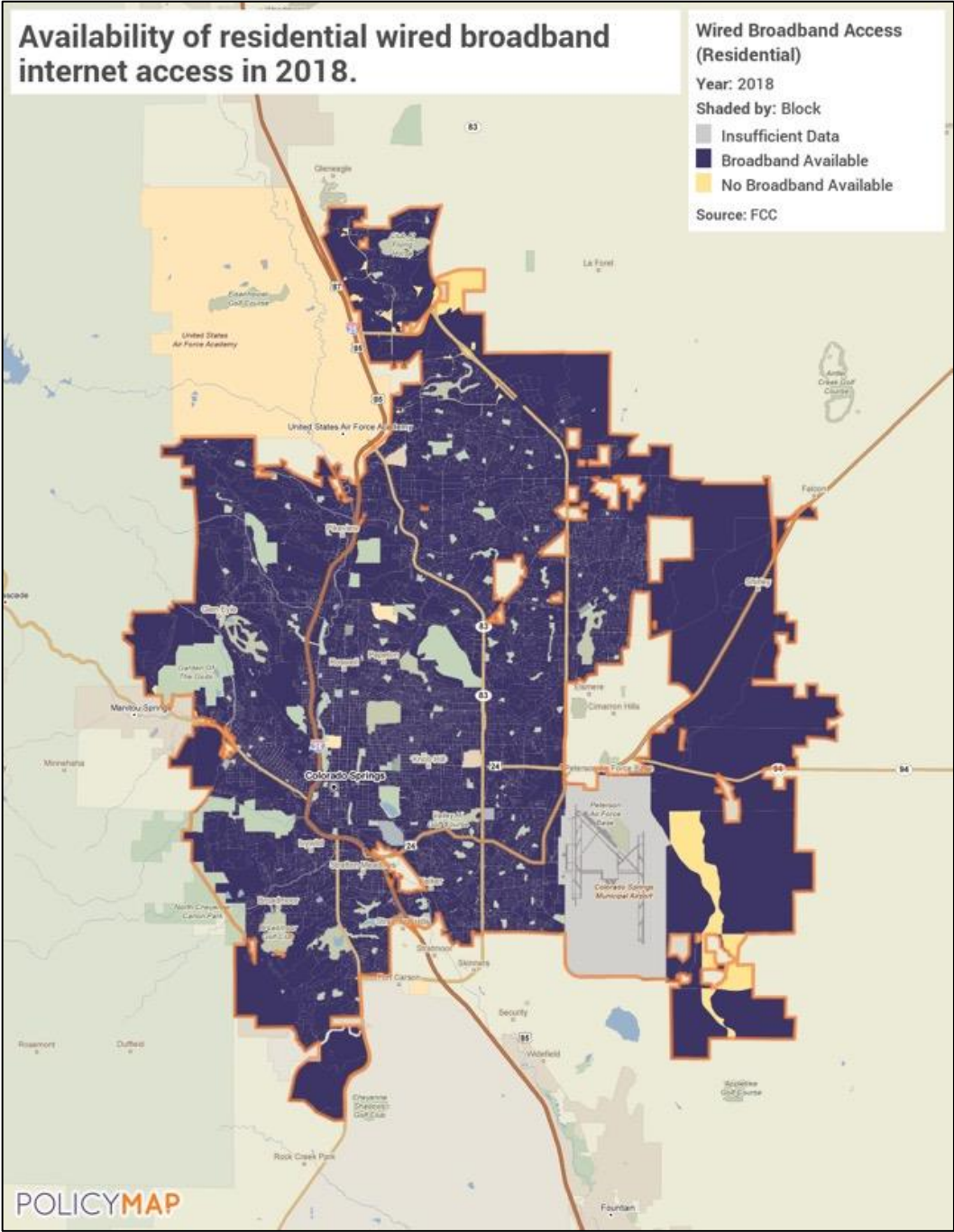
Kellin Communications (fixed wireless)

Viasat Internet (formerly Exede)(Satellite)

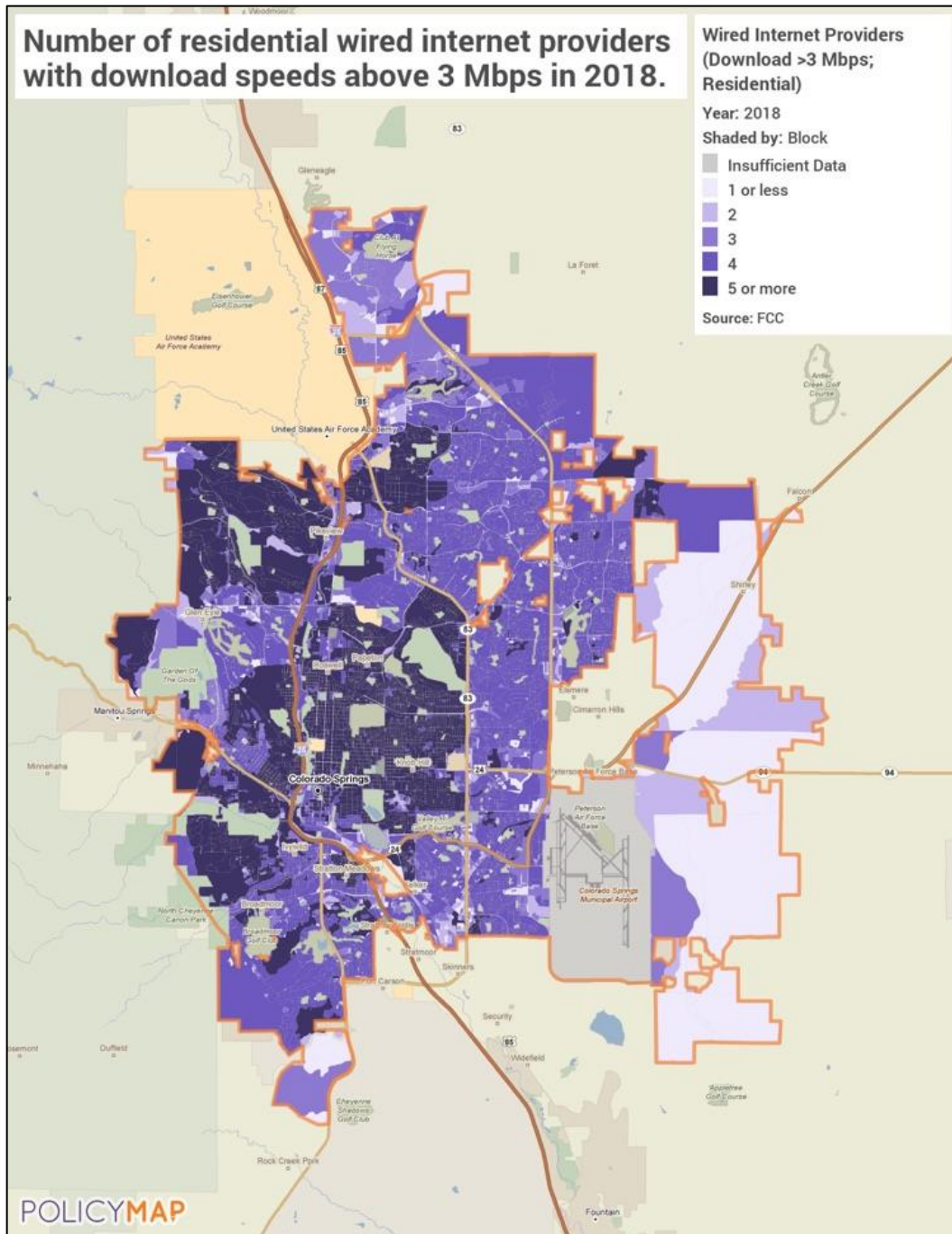
HughesNet (Satellite)

The following map shows the number of broadband service providers by census tract. Most of the city has at least two options of high-speed internet with competitive providers, though there are some tracts with lower populations that only have access to one provider.

See map: Highspeed Internet Providers



Broadband Access



Highspeed Internet Providers

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction’s increased natural hazard risks associated with climate change.

Colorado Springs has historically been prone to various natural hazard events including flooding, hail, thunderstorm winds, extreme cold, winter storms, and others. The potential impacts of climate change—including an increase in prolonged periods of extreme temperatures, more heavy precipitation, more severe storms or floods—are often most significant for vulnerable communities. By the middle of the century the average summer temperature is expected to rise four degrees. This rise in temperature could lead to altered weather and precipitation patterns, a rise in severe storms, an increased risk of catastrophic floods, increased electricity costs, and ruined crops. Additionally, any increase in the ocean levels or increased storm activity will lead to people moving from the coast. An increase of people could come into the City which may drive up housing costs, reduce the availability of jobs, and tax resources.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Low- and moderate-income residents are at particular risk due to having less available resources to combat the impacts of natural disasters. A dramatic rise in electricity or housing costs could put them at imminent risk of homelessness or living in substandard conditions. Residents in rural communities will have less access to public support in case of emergencies and will have fewer resources to repair or prevent damage to their homes.

The City of Colorado Springs strives to inform and prepare the general public for multi-hazard mitigation. There are online venues (including the Colorado Springs Office of Emergency Management website and social media pages, the city website, El Paso County Office of Emergency Management website and social media pages, and the CO Voluntary Organizations Active in Disasters (VOAD) website and Facebook page) that disseminate numerous informational guidebooks, videos, and emergency resources to build disaster resiliency in the community.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The federal CDBG and HOME funds are intended to provide low- and moderate-income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration.

The system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG and HOME Programs
- Meeting the needs of low- and moderate-income residents
- Focusing on low- and moderate-income areas or neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs
- Sustainability and/or long-term impact, and
- The ability to demonstrate measurable progress and success.

This section explains how the needs described in previous sections of the plan translate to goals and objectives, and how the City will address them given expected resources and challenges. The Strategic Plan includes broad strategies to advance goals related to affordable housing, homelessness, special needs and community development for the next five years.

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

Geographic Area

Table 45 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The allocation of funds geographically is based primarily on analysis of neighborhood needs, affordable housing needs and the strengths and merits of applications for competitively awarded funds. Neighborhoods in need of accessible, multimodal infrastructure, more employment opportunities, safety improvements, housing rehabilitation, new housing, and commercial improvements are a priority. Community Development staff partners with a variety of city departments and local leaders, such as the City's Infrastructure Coordination Committee, Neighborhood Services, Council boards and commissions, Colorado Springs Police Department, service providers, and the Council of Neighborhoods and Organizations, to identify areas with urgent needs and to make immediate investments to arrest neighborhood decline and improve quality of life. CDD staff will coordinate with Economic Development to assist with any Opportunity Zone projects that involve housing or public service uses. The allocation of funds is also considered within the context of the City's overall budget. Whenever beneficial, the City seeks to combine block grant funds with City General Funds, other funding sources, and public works initiatives, such as the 2C program.

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

Priority Needs

Table 46 – Priority Needs Summary

1	Priority Need Name	Expand/Improve Public Infrastructure & Facilities
	Priority Level	High
	Population	Low Moderate Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	1A. Expand Public Infrastructure 1B. Improve Public Infrastructure Capacity 1C. Improve Access to Public Facilities
	Description	The City is in need of improvements to public facilities and infrastructure such as parks, community centers, playgrounds, sewers, sidewalks, street repaving, traffic lights, curb cuts, broadband improvements to reduce the digital divide, and ADA improvements to public facilities to remove architectural barriers that prohibit or impede handicapped accessibility.
	Basis for Relative Priority	Along with improving access to affordable housing, improvements to public facilities and infrastructure is one of the highest priorities for the City.
2	Priority Need Name	Preserve & Develop Affordable Housing
	Priority Level	High
	Population	Low Moderate Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Elderly Persons with Physical Disabilities
	Geographic Areas Affected	
	Associated Goals	2A. Provide for Owner Occupied Housing Rehab 2B. Increase Homeownership Opportunities 2C. Increase Affordable Rental Housing Options

	<p>Description</p>	<p>There is a significant lack of affordable housing throughout the City. As such, preservation of existing affordable housing as well as the development of new affordable housing opportunities is the highest priority for the City's CDBG, HOME and ESG programs. Specifically, there is a need for targeted development to address (1) a lack of access to opportunity due to high costs of existing housing in areas of opportunity; (2) the lack of affordable units in a range of sizes, and (3) a lack of affordable and accessible housing in range of unit sizes. Special needs populations have increased challenges accessing housing in this expensive market and are in need of supportive housing options as well as improvements to existing residential units to make them more accessible/ADA compliant.</p>
	<p>Basis for Relative Priority</p>	<p>Preserving the existing housing stock along with expanding affordable housing opportunities is the highest priority for the City's CDBG, HOME & ESG programs.</p>
<p>3</p>	<p>Priority Need Name</p>	<p>Public Services & Quality of Life Improvements</p>
	<p>Priority Level</p>	<p>High</p>
	<p>Population</p>	<p>Extremely Low Low Moderate Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Victims of Domestic Violence Non-housing Community Development</p>
	<p>Geographic Areas Affected</p>	
	<p>Associated Goals</p>	<p>3A. Provide Supportive Services for Special Needs 3B. Provide Vital Services for LMI Households</p>
	<p>Description</p>	<p>Through stakeholder interviews and community surveys, many public service needs were identified in the community. Over the next five years, the City will focus public service funding towards organizations and programs that serve individuals or families experiencing homelessness and seniors.</p>

	Basis for Relative Priority	Through community participation and consultation of local stakeholder partners and organizations the need for Public Services for LMI and Special Needs was identified.
4	Priority Need Name	Economic Development Opportunities
	Priority Level	High
	Population	Low Moderate Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	4A. Direct Assistance to For-Profit Businesses
	Description	The City is in need of programs that will support small business development and build capacity of business owners through loans and technical assistance to ultimately increase services in LMI areas and create new job opportunities for City residents.
	Basis for Relative Priority	The City has identified economic development as a high priority for CDBG funds. However, due to the limited nature of these funds and the extreme demands for affordable housing, economic development is a relatively lower priority.
5	Priority Need Name	Homeless Housing & Supportive Services
	Priority Level	High
	Population	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	
	Associated Goals	5A. Provide Homeless Rapid Re-Housing Assistance 5B. Provide Assistance to Homeless Shelters

Description	<p>The City’s current homeless population includes families and individuals facing a range of challenges including substance abuse, domestic violence, and mental health. Outreach and supportive services are desperately needed to assist these populations. Additionally, funds are needed to support shelter operations as well as provide for homeless prevention and rapid rehousing - including tenant based rental assistance.</p>
Basis for Relative Priority	<p>Providing for homeless prevention, supportive services and rapid re-housing programs is the highest priority for the City's ESG program.</p>

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

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	High market-rate rents relative to average wages in Colorado Springs may limit the ability of Housing Choice Voucher holders and holders of other forms of TBRA such as Shelter Plus Care to successfully obtain rental housing.
TBRA for Non-Homeless Special Needs	See above.
New Unit Production	An inadequate supply of affordable housing, in addition to the high cost of housing in the City (and County) for low-income persons (paying more than 30% of household income for housing), is the major housing problem. Maximizing available resources to increase the supply of affordable rental units is a high priority.
Rehabilitation	The data from the Needs Assessment and Market Analysis reveals the increasing gap in housing affordability. Rehabilitation of existing units has been one tool the City will continue to use over the next five years. Housing rehabilitation to increase accessibility for Colorado Springs’ growing senior population will continue to be a focus.
Acquisition, including preservation	While median sales prices have largely recovered to their pre-crash levels, the volume of sales is still lagging despite historically low interest rates. Tighter lending restrictions combined with generally low wages in some key employment sectors are resulting in low homeownership rates among minority populations. Providing funding for homeownership programs will continue in this plan cycle.

Table 47 – Influence of Market Conditions

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

Introduction

At the time of publication of this draft Consolidated Plan and Annual Action Plan, the City of Colorado Springs had not been notified by HUD of the precise amount of funding to be allocated to the City for the 2020 program year. With this in mind, the funding amounts identified throughout this plan are estimates based on the City's 2019 funding allocations for each entitlement program. The actual funding amounts will be updated once the 2020 funding allocations are published by HUD.

The City will receive \$3,079,570 in Community Development Block Grant (CDBG) entitlement funding, \$1,532,532 in HOME Partnership Program funding, and \$257,266 in Emergency Solutions Grant (ESG) funding in FY20. Based on equal funding across all programs, the City anticipates receiving an estimated \$15,397,850 in CDBG funding, \$7,662,660 in HOME funding, and \$1,286,330 in ESG funding over the next five years.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,079,570	0	0	3,079,570	12,318,280	Remainder of ConPlan is for program years 2021 through 2024.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,532,532	0	0	1532532	6,130,128	Remainder of ConPlan is for program years 2021 through 2024.
ESG	public - federal	Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Homeless Prevention	257,266	0	0	257,266	1,029,064	Remainder of ConPlan is for program years 2021 through 2024.
ESG-CV	Public - federal	Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Homeless Prevention	887,124				887,124	To prevent, prepare for and respond to the coronavirus.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG-CV	Public - federal	Admin and Planning Economic Development Public Services	1,811,610				1,811610	To prevent, prepare for and respond to the coronavirus.

Table 48 - Anticipated Resources

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, City General Funds and CoC competitive grant funds to address the objectives identified in this Plan. In addition, a portion of the City's Private Activity Bond capacity is set aside for affordable housing development each year. High-impact projects with the potential for public-private partnerships will be prioritized in order to leverage additional resources. Colorado Springs complies with federal matching requirements for both HOME and ESG funds. ESG funds are matched by subrecipient funds.

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.

Non-profit housing and service providers rely on many sources of revenue for their operations. This includes the CoC and Homeward Pikes Peak. Both agencies pursue multiple sources of funding for housing and social service programs.

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 right-of-ways, and other municipal needs.

SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Colorado Springs	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
COLORADO SPRINGS HOUSING AUTHORITY	PHA	Public Housing	Jurisdiction
El Paso County Housing Authority	PHA	Ownership Public Housing	Jurisdiction
Pikes Peak CoC	Continuum of care	Homelessness Non-homeless special needs public services	Region
Colorado Springs Utilities	Public institution	public facilities	Region

Table 49 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Colorado Springs Community Development Division is the responsible entity for spending the entitlement funds from the U.S. Department of Housing and Urban Development. As other departments and divisions receive federal grant dollars, the City’s Federal Grants Manager maintains general oversight over all City grantees to ensure best grant management practices.

The relationships between the City and its peer agencies, as well as those among City departments, have developed in response to the community needs mentioned in the Needs Assessment section of this Plan. Community Development Division now works directly and regularly with other departments in the City to combine or complement efforts in the community when goals align, such as with neighborhood planning, accessibility improvements, or infrastructure projects. Most recently, the Division has begun to work with Colorado Springs Utilities, a public-owned utility, on creating a tier-based fee structure to incentivize more affordable housing development. These are in development and are targeted for implementation in 2020.

The Division and the CoC also collaborate on ESG and CoC written standards, governing board actions, funding decisions, program development, point-in-time counts, and reporting requirements. This is all to reduce redundancies for subrecipients, expand services and access to services to clients, improve system data quality, and ensure swift and successful exits to housing.

The City also has a good relationship with its local housing authority. The Division and the Colorado Springs Housing Authority are working together on two high-impact programs: tenant-based rental assistance (TBRA) and Section 504 compliance. The Division plans to renew their contract with the CSHA to spend HOME TBRA funds to place people exiting homelessness into affordable housing. For the latter, since the list of CSHA units planned for accessibility rehabilitation exceeds the Authority’s available maintenance budget, the Division is entering into an agreement with the CSHA to help provide supplemental assistance for their Section 504 renovations.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X		X
Street Outreach Services			
Law Enforcement	X	X	X
Mobile Clinics	X		
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
	X	X	X

Table 50 - Homeless Prevention Services Summary

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

The City supports a Continuum of Care (CoC) approach to addressing homelessness. The area is served by the Pikes Peak Continuum of Care (), which covers all the geography within the boundaries of El Paso County, Colorado, including all unincorporated areas. The is a collaborative community-based system of housing and services for those experiencing homelessness or those persons at risk of homelessness. Community Health Partnership took over administration of the in 2018. In 2019, the Board welcomed a new HMIS provider and updated their governance charter.

The City seeks to:

- Promote communitywide commitment to the goal of ending homelessness through regional coordination and collaboration.
- Advocate for funding and resources to end homelessness and provide funding for proven efforts by nonprofit providers, States, and local governments to quickly rehouse people experiencing homelessness, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness.
- Promote access to and effective utilization of mainstream programs by homeless individuals and families.
- Promote implementation of best practices and evidence-based approaches to homeless programing and services.

Much of the work is done through subcommittees, though the primary committee is the Ranking and Prioritization Committee. This committee creates policies, procedures, forms and documents for monitoring, reviewing, ranking and prioritizing HUD-funded CoC projects. It reviews and monitors project performance (APR's, data quality and completeness, capacity utilization, outcomes, and other metrics defined by the Governing Board). It ranks and prioritizes projects during the CoC Program competition phase, and makes recommendations to the Governing Board. It identifies low performing projects needing attention and recommends best practices to the Governing Board. This committee meets on a regular basis each year while the CoC application window is open.

CHP administers the area's Coordinated Entry program, as well. It is designed to assess, assign, and assist vulnerable homeless households to CoC-funded housing programs including: permanent supportive housing, transitional housing, rapid re-housing, and other project-based housing vouchers.

Coordinated Entry operates under the authority of HUD 24 CFR 578.7(a)(8), which mandates the CE process be developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their individual strengths and needs.

In addition to the, the City has a designated Homeless Prevention and Response Coordinator to serve as a liaison between the public, service providers, and people experiencing homelessness. The Coordinator created the 2019 Homelessness Initiative, a short term, 5-point plan to develop more resources for the homeless beyond ESG and CoC-funded projects, including: a public awareness and fundraising campaign; increase of shelter beds; lower barriers for exiting homelessness; increase access to housing; and camp cleanups.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The collaborative approach, recent administrative changes, and diversified board membership of the Pikes Peak Continuum of Care are all significant strengths for the system of homeless service providers. While the recent change to a different Homeless Management Information System (HMIS) database platform has been positive in usability and analytics, the cost was an issue, so sustaining member fees and good data practices will be essential in maintaining a high level of data quality. Reliable data quality is essential for identifying gaps in the service delivery system and for ensuring maximum federal funding for the, which affects all service providers and users downstream.

Currently, after regular analysis of the HMIS data, consultations with local service providers over the last year, various public engagement initiatives such as the homelessness townhalls conducted in 2018, public meetings for the 2019 and 2020 Action Plans, we are aware of the following significant gaps in the service delivery system:

- Family shelter
- Youth day center
- Affordable housing options for very low and low-income households
- Permanent supportive housing options for people with disabling conditions
- Street outreach for adults
- Incentives for landlords to participate in voucher or other rental assistance programs

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

There is a lot of productive work around addressing and resolving all of the gaps mentioned above. A group of family service providers – Catholic Charities, Partners in Housing, and Family Promise – presented a proposal called the 20-40 Plan to the City, the service provider community, and other funders. This proposal defines the system’s current inability to serve families in shelters or in housing solutions. The explicit request for family shelter units and transitional housing in Colorado Springs has made funders and community members aware that there are still holes to fill in the continuum for moving families into permanent housing as quickly as possible. Organizers are in the process of looking for a suitable site for a family shelter and funding for transitional housing. The Division has pledged to use appropriate funding sources to support these efforts.

To summarize how the community is addressing the rest of the items listed above: The area's principal homeless youth provider, The Place (fka Urban Peak Colorado Springs), is also actively pursuing location and funding for a youth day center. The City is introducing an affordable housing plan with incentives and strategies heavily focused on development of units for low- to very low-income families and improving the availability of units for service providers to place clients exiting or preventing homelessness. After the groundbreaking of the area's first permanent supportive housing project (Greenway Flats), there has been considerable progress in building service providers' capacity to partner with developers in applying for low-income housing tax credits (LIHTC) to create more permanent supportive housing projects. Lastly, the City's Homelessness Prevention and Response Coordinator has been working with the fire department and local service providers to create a downtown homeless outreach pilot program directed at unaccompanied adults as well as a landlord incentive fund for housing homeless veterans. Both programs are expected to be fully operational by 2020.

SP-45 Goals Summary – 91.215(a)(4)

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		Expand/Improve Public Infrastructure & Facilities	CDBG: \$1,638,217	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12500 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 25 Households Assisted
2	1B. Improve Public Infrastructure Capacity	2020	2024	Non-Housing Community Development		Expand/Improve Public Infrastructure & Facilities	CDBG: \$1,638,217	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12500 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 25 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	1C. Improve Access to Public Facilities	2020	2024	Non-Housing Community Development		Expand/Improve Public Infrastructure & Facilities	CDBG: \$1,638,217	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12500 Persons Assisted
4	2A. Provide for Owner Occupied Housing Rehab	2020	2024	Affordable Housing		Preserve & Develop Affordable Housing	CDBG: \$4,810,085	Homeowner Housing Rehabilitated: 250 Household Housing Unit
5	2B. Increase Homeownership Opportunities	2020	2024	Affordable Housing		Preserve & Develop Affordable Housing	HOME: \$3,491,167	Direct Financial Assistance to Homebuyers: 75 Households Assisted
6	2C. Increase Affordable Rental Housing Options	2020	2024	Affordable Housing		Preserve & Develop Affordable Housing	HOME: \$3,491,167	Rental units constructed: 250 Household Housing Unit Rental units rehabilitated: 50 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 75 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	3A. Provide Supportive Services for Special Needs	2020	2024	Homeless Non-Homeless Special Needs		Public Services & Quality of Life Improvements	CDBG: \$1,516,222	Public service activities other than Low/Moderate Income Housing Benefit: 12500 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 250 Households Assisted
8	3B. Provide Vital Services for LMI Households	2020	2024	Non-Housing Community Development		Public Services & Quality of Life Improvements	CDBG: \$1,516,222	Public service activities other than Low/Moderate Income Housing Benefit: 12500 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 250 Households Assisted
9	4A. Direct Assistance to For-Profit Businesses	2020	2024	Non-Housing Community Development		Economic Development Opportunities	CDBG: \$1,882,207	Businesses assisted: 5 Businesses Assisted
10	5A. Provide Homeless Rapid Re-Housing Assistance	2020	2024	Homeless		Homeless Housing & Supportive Services	ESG: \$222,542	Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted Homelessness Prevention: 50 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	5B. Provide Assistance to Homeless Shelters	2020	2024	Homeless		Homeless Housing & Supportive Services	ESG: \$1,049,127	Homeless Person Overnight Shelter: 15000 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 25 Beds

Table 51 – 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. This may include but is not limited to expansion of public water & sewer, repairs to public roads, sidewalks and stormwater management systems.
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 including but not limited to needed repairs to water & sewer systems, repairs to roads, sidewalks and storm water management systems.
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.

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 to provide down payment assistance to first time homebuyers to increase affordable housing opportunities for 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.
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.
8	Goal Name	3B. Provide Vital Services for LMI Households
	Goal Description	The City will provide funding for services and programs that primarily benefit low-income individuals or families including but not limited to programs such as youth mentoring programs, fair housing promotion, alcohol and substance abuse treatment programs, and domestic violence assistance services - to name a few.
9	Goal Name	4A. Direct Assistance to For-Profit Businesses
	Goal Description	The City will provide direct financial assistance to for-profit businesses to aid with facade improvements and business expansion efforts. These efforts will be concentrated in low-income neighborhoods or areas of low economic opportunity as well as provide assistance to low-income microenterprises.
10	Goal Name	5A. Provide Homeless Rapid Re-Housing Assistance
	Goal Description	The City will provide funding for homeless 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.

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.

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

Homeowner Housing Rehabilitated:

250 Household Housing Unit

Direct Financial Assistance to Homebuyers:

75 Households Assisted

Rental units constructed:

250 Household Housing Unit

Rental units rehabilitated:

50 Household Housing Unit

Tenant-based rental assistance / Rapid Rehousing:

175 Households Assisted

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

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

CDD is entering into a multi-year CDBG funded effort to assist the Housing Authority with its Section 504 transition plan. Between 2020-2024, CSHA anticipates that **(10) units** in its portfolio will become accessible.

Activities to Increase Resident Involvements

The Colorado Springs Housing Authority has a Resident Advisory Board (RAB) that is open to all CSHA residents. It is currently made up of 6 to 7 residents who drive the agenda and convene other tenants to discuss housing and neighborhood issues. The CSHA assists residents in implementing projects that improve their neighborhoods such as health programs, security, and resource access. The CSHA Board also holds open meetings, open to tenants and members of the general public, for opportunities to introduce issues for discussion or to share business operation decisions with the public.

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

No

Plan to remove the ‘troubled’ designation

The Colorado Springs Housing Authority is not designated as troubled.

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

Barriers to Affordable Housing

State and local governments, non-profits, building industry groups, scholars, and homeless service providers have all contributed to a body of knowledge surrounding affordable housing. Locally, several public forums have also shed light on the barriers residents and developers face here. Nationwide and in Colorado Springs, barriers to affordable housing include:

- Wage growth lagging behind growing costs of housing
- Cost of land, especially in urban areas
- Shortage of skilled labor in construction trades
- “Not in my backyard” conflicts
- Lack of accessible units
- Saving for a down payment
- Initial utility fees

Locally, our housing market survey showed that people encounter other types of barriers to affordable housing, such as:

- Rental application costs
- Condition of available housing stock
- Lack of landlord participation in voucher programs

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

In 2018, the Mayor of Colorado Springs, John Suthers, challenged the community to build or preserve on average 1000 units of affordable housing each year over a 5 year period. To support the goal, staff in the Community Development Division created HomeCOS: Housing Our Future, an affordable and attainable housing plan for Colorado Springs. HomeCOS recognizes the unique challenges faced by individuals and families across a wide spectrum of incomes and life stages.

HomeCOS includes an overview of recent development trends in single- and multi-family housing and explores the mismatch between household income and area housing costs. The plan highlights the social and economic benefits that come with addressing housing affordability, and most importantly, the plan points the way to collaborations between the public and private sectors that are essential to meeting current and future housing needs in Colorado Springs.

A set of six core objectives support the goal of building or preserving an average of 1000 units of affordable housing each year. The objectives include:

- Reducing homelessness by facilitating the movement of individuals and families out of the shelter system into housing.

- Increasing the supply of affordable rental units, particularly for fixed-income, disabled, and lower hourly wage-earning households.
- Increasing opportunities for homeownership among low- to moderate-income households.
- Addressing the need for housing that caters specifically to the region’s aging and disabled populations.
- Encouraging innovative design and development solutions to address housing needs.
- Creating and promoting alternative finance tools to supplement the Low Income Housing Tax Credit program.

Specific strategies supporting each objective provide a variety of means for public and private stakeholders to bring expertise and commitment to a collaborative process for meeting the Mayor’s housing goals. Collaboration is essential if Colorado Springs expects to benefit from the primary means of financing the development of new affordable housing. The Low-Income Housing Tax Credit (LIHTC) program administered by the Colorado Housing Finance Authority is the most frequently sought after tool for building and preserving affordable homes and apartments. HomeCOS provides an essential guide for developers seeking to understand local housing needs, respond with appropriate projects, and access the regulatory and finance tools needed to make those projects a reality.

Increasing the supply of attainable housing is important as well. In the context of HomeCOS, affordable housing is defined as housing that does not require more than 30% of household income to secure and is subject to affordability restrictions in the form of long-term rent limits or, in the case of for-sale housing, re-sale to a subsequent low- to moderate-income household. Attainable housing, by contrast, may be priced to meet the needs of lower-income households in the region but is not typically subject to long-term rent restrictions or re-sale provisions. Both are essential to meeting the region’s current and projected housing needs.

SP-60 Homelessness Strategy – 91.215(d)

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

Preventing and ending homelessness will continue to be a top priority in 2020 and beyond. The City and its partners made significant progress in meeting the goals of the 2014 *Initiative to End Homelessness*, most notably by establishing a strong CoC, funding and building a low barrier shelter and resource center, and expanding street outreach. Since the last Consolidated Plan, the Colorado Springs Police Department expanded its team of trauma-informed outreach professionals on its Homeless Outreach Team (HOT). The City has also continued to fund street outreach for youth.

In 2019, the City's Homelessness Prevention and Response Coordinator unveiled a short-term Homelessness Initiative, a 5-point plan for immediate implementation. 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.

Lastly, the Community Development Division manager serves on the CoC Governing Board to promote better collaboration and ensure the highest priorities are funded first. Street outreach will continue to be a component of ESG that the Division seeks to fund. City staff and 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, to communicate current needs and conditions of this population. Members of this group work firsthand in reaching out to those experiencing homelessness or at risk of homelessness in Colorado Springs.

Addressing the emergency and transitional housing needs of homeless persons

The City and its partners have made a significant dent in the shelter needs for Colorado Springs since the last Consolidated Plan. One of the primary goals in the City's Initiative to End Homelessness was to increase access to emergency shelter, especially during winter months. Since 2014, the City, CoC, service providers, and public and private funders have been able to:

- Increase shelter capacity especially for special needs populations, including people with disabilities, elderly clients, and persons recovering from illness
- Increase the number of nightly winter shelter beds
- Simplify access requirements to increase entry into shelters
- Strengthen priority placement system (Coordinated Entry) that moves clients out of shelter and into housing quickly with essential resources like case management and rental assistance to build stability

Springs Rescue Mission, the City's first low-barrier shelter, can now offer up to 300 beds in winter for both men and women. Salvation Army has also undergone facility changes to accept single adults while also

accommodating families. The primary forms of emergency shelter for families in Colorado Springs beside the few beds at Salvation Army are hotel vouchers and hosting church facilities. 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.

During the next five years, the City's federal funds will continue to support programs to provide decent and safe living environments for homeless and those at risk of becoming homeless, through funding such activities as emergency shelter operations, shelter expansion and rehabilitation, transitional housing rehabilitation, development of permanent supportive housing, tenant based rental assistance and rapid re-housing. The City will also continue to fund non-profits 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 shelters that offer supportive services such as counseling and case management to help homeless persons 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 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 will be evaluated annually as part of the application process.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

They will be rewriting a system-wide discharge policy in 2020. The City and its partners have a number of strategies to prevent homelessness to address the needs of the extremely low-income individuals and families in Colorado Springs. The City has a non-profit healthcare provider for homeless clients discharged from the hospital – it serves as hospice care for the severely ill and as a recuperative shelter for people

who can move on to transitional or permanent housing. The also seeks out more partners who can assist people exiting the prison system to ensure housing stability and decrease recidivism.

The City will continue to 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.

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

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

The abatement of lead in existing housing units is built into the City's strategy for addressing the housing needs faced by low-income families, particularly those with children. Lead paint testing and abatement is incorporated into CDBG and HOME housing rehabilitation and affordable housing preservation programs to permanently eliminate lead paint hazards and increase access to housing without lead based hazards.

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

In 2016, according to the state Environmental Public Health department, in El Paso County, 1.2% under the age of 6 years tested positive for elevated blood lead levels (16 out of 1,360 children). As Colorado Springs is 67% of the population of the county, it is assumed that the City's children will also test similarly for elevated blood lead levels at 1.2%. There are an estimated 34,930 children 6 years and under in the city, and taken the account of the children having a similar percentage with elevated blood lead levels, there is an estimated 420 children who may be affected by this environmental health issue. (Source: 2013-2017 ACS, B05009). The highest risk areas, where there is a majority of older homes in LMI areas with the most young children are south of I-25 and in the eastside neighborhoods between Union Blvd and Circle Dr.

This data will be shared with our housing rehabilitation contractor, Brothers Redevelopment, to target qualifying households in this area.

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

The Community Development Division is compliant with the Lead Safe Housing Rule in all of its housing rehabilitation programs as well as affordable housing preservation, and plans for reduction are fully integrated into the City's housing policies and programs. Housing rehabilitation contractors will continue to conduct lead-based paint testing for homes built prior to 1978 and will utilize applicable procedures for lead safe work practices and abatement. Households requesting assistance for homes that were constructed prior to 1978 are all tested for lead based paint. When a lead-based paint survey is conducted on a structure, clients receive a copy of the inspection summary that indicates if lead is present and provides a brief summary of the inspection.

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

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

The City of Colorado Springs 2020-2024 Strategic Plan has four platform goals:

- Promoting job creation
- Investing in infrastructure
- Building community and collaborative relationships
- Excelling in city services

This Strategic Plan and Consolidated Plan builds on all of these, with the proposed investments best fitting into the third platform which covers issues of poverty, homelessness, and housing issues.

HOME and CDBG investments also spur job creation, particularly through financing new multifamily construction, whose direct, indirect, and induced impact is estimated to create 161 local jobs per 100 units (National Association of Home Builders, 2015).

Our CDBG, ESG, and HOME funds will continue to target our most vulnerable households – seniors, disabled, and very-low income households – for services, rental assistance, shelter, homeowner rehabilitation, and down payment assistance.

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

The City, through the Community Development Division, coordinates housing services with activities that help reduce the number of poverty-level families in the community. This is primarily done in partnership with non-profit and for-profit housing developers by restricting income mix in projects and requiring periods of affordability that will benefit those trying to work their way out of poverty. This Consolidated Plan also recognizes the need for both affordable rental and homebuyer opportunities, which is why the City works with established land trusts, sweat-equity housing models, housing authorities, private developers, and current homeowners to create and preserve more affordable housing. We recognize that people cannot improve their health, increase their income, or fully participate in civic life without stable housing.

The City contracts with a high-capacity housing development and management company to provide a robust housing rehabilitation program for low-income families to make health and safety improvements to their homes. The program emphasizes energy efficiency to reduce housing-related costs.

The City has worked with the Pikes Peak Continuum of Care to make sure our ESG awards and written standards complement the programs the funds and its policies. For example, we have made participation in Coordinated Entry and the use of HMIS (homelessness database) as criteria for eligibility for ESG

funding. The policies and procedures exist to ensure that there are no unnecessary barriers to service and that there is no wrong door for people experiencing homelessness to receive the shelter and services necessary to pull them out of homelessness and into stable housing.

During this 5-year planning cycle, the Division will also administer Economic Development funds for small businesses to establish themselves, grow, and serve their communities. We will do this in partnership with our City's Economic Development Division and their small business assistance team, focusing on our most economically distressed neighborhoods.

Lastly, the Division will devote its Public Services dollars to organizations providing critical services to families and individuals that will help them improve their health, secure stable housing, or increase their earning potential.

SP-80 Monitoring – 91.230

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

The City of Colorado Springs has recently updated its monitoring plans – HOME in 2017 and CDBG in 2019. An abbreviated summary of the new monitoring plan for all those programs is presented below. The ESG monitoring plan was last submitted to HUD in 2015 and will be reviewed again in 2020. In addition, the City was recently monitored in March 2020 and is implementing best practices recommended from HUD staff as a result.

For an in-depth description, which could not be inserted here due to IDIS character limits, refer to the appendix of this plan.

CDBG Program Monitoring:

The City will conduct onsite monitoring for CDBG activities carried out by subrecipients at least once every three years. Onsite monitoring of subrecipients will be based on the results of a risk assessment. Desk monitoring of subrecipients occurs throughout the program year. The City will also conduct an internal monitoring evaluation of CDBG activities carried out by City staff if such activities are selected. In addition, the City will conduct an annual monitoring evaluation of its CDBG administrative processes. The City of Colorado Springs Subrecipient Monitoring Guide will be used by CDBG division staff to assist in HUD program monitoring activities.

The City will notify subrecipients by mail of the time and date for their scheduled monitoring visit. In addition, subrecipients will be notified of the program areas to be evaluated. The City's notification will include a list of documentation to be made available and the key staff of the organization that need to be present during the monitoring visit. Notification will be provided approximately four (4) weeks prior to the scheduled visit.

If there are any deficiencies or findings, recipients will have thirty days to resolve the deficiencies or findings. When reviews of all documents of corrective actions taken by the subrecipient indicate that the identified concerns or findings have been corrected to the satisfaction of the City, a letter will be mailed to the authorized official of the subrecipient and the chairperson of the governing board stating that the findings are resolved.

HOME Program Monitoring:

The Community Development Division (CDD) will monitor annually its HOME program for compliance in four general areas:

- **Program monitoring** to assess the overall performance and operation of the program and to assess if the City’s HOME programs and activities are carried out effectively and in compliance with current HOME rules and regulations
- **Administrative and financial monitoring** to assess the fiscal and administrative management of HOME funds
- **Project monitoring** to assess compliance with requirements related to specific HOME activities and projects (such as specific homebuyer or rental development projects), and
- **Long-term monitoring** to assess compliance with long-term HOME requirements that apply to HOME-assisted rental and homeownership housing after project completion.

Long-term compliance with requirements of programs awarded:

At application, documentation is required from each applicant, verifying their status as an equal opportunity employer, their practice of affirmative action, and their adherence to policies of non-discrimination. Through desk monitoring and site visits, subrecipients are observed and queried for ongoing nonadherence. Intake and eligibility processes must reflect adherence to civil rights requirements, for example.

At the pre-bid and pre-construction meetings, bidders and contractors are instructed that compliant procurement includes outreach to WBE/MBE. Instructions are given on utilizing SBA data to perform the outreach, and data is collected from contractors on how they performed the outreach, their process for revising and awarding bids, as well as the composition of their slate of awarded bids.

ESG Monitoring:

ESG monitoring begins with an in-depth risk assessment, which addresses the applicant’s administrative, financial, and staffing capacity to manage federal grants. The assessment takes into account whether or not the applicant has received federal funding in previous years, and, if so, how they were able to manage that funding. Subsequently, the result of the risk assessment is used in conjunction with other inputs as part of the application review process that guides award or denial of funding.

For applicants who are awarded, the risk assessment is applied to their monitoring plan. The monitoring plan takes into account the level of risk that the applicant demonstrates to the City. The monitoring plan includes desk monitoring, monitoring correspondence to and from the subrecipient, and monitoring requests for reimbursement and beneficiary tracking, and onsite monitoring/observation.

Depending on the risk assessment score, the monitoring plan can vary from monthly or quarterly desk monitoring and an annual site visit, to weekly site visits and additional data validation. Monitoring assesses whether the federally funded activities are executed according to applicable federal requirements and in compliance with eligibility and national objective requirements, including verification of income eligibility and intake compliance. Particular attention is paid to subrecipient performance, including timeliness, outcomes, quality aspects of project, the success of the project in terms of achieving the stated objective of the activity, and whether actual performance to date is consistent with the terms of the written agreement. Other areas emphasized are accounting systems, fiscal controls, procurement, financial policies and procedures, record keeping, and compliance with civil rights requirements.

Monitoring ensures that files are maintained in accordance with the requirements set forth in the agreement between the subrecipient and the City; that proper documentation of reimbursements, participant eligibility, performance reporting and financial management of funds is maintained; that substantiated requests for reimbursement are submitted according to timelines set forth in the written agreement; and that the subrecipient demonstrates timely expenditure of funds and successful accomplishment of stated objectives.

A monitoring record is maintained in the subrecipient file, documenting all of the above. Monitoring concerns or findings are documented in the subrecipient file, as well as issued to the subrecipient. Concerns or findings must be addressed by the subrecipient within 30 days. The monitoring record is then used in review of subsequent program year applications, to address applicant's risk in managing federal funds.

Annual Action Plan

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

Introduction

At the time of publication of the draft Consolidated Plan and Annual Action Plan, the City of Colorado Springs had not been notified by HUD of the precise amount of funding to be allocated to the City for the 2020 program year. With this in mind, the funding amounts identified throughout this plan are estimates based on the City's 2019 funding allocations for each entitlement program. The contingency plan was to decrease or increase the program budgets on a pro rata basis.

HUD announced the funding amounts for jurisdictions on February 14, 2020. The City will receive \$3,079,570 in Community Development Block Grant (CDBG) entitlement funding, \$1,532,532 in HOME Partnership Program funding, and \$257,266 in Emergency Solutions Grant (ESG) funding in Program Year 2020. Based on equal funding across all programs, the City anticipates receiving an estimated \$15,397,850 in CDBG funding, \$7,662,660 in HOME funding, and \$1,286,330 in ESG funding over the next five years.

On April 2, the City was notified that it would receive an additional \$2.69 million dollars to prevent, prepare for, and respond to the

coronavirus. Substantial Amendment 1 adds these funds - \$1,811,610 in CDBG-CV and 887,124 in ESG-CV – to Table 59 below.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Rehab Public Improvements Public Services	\$3,079,520	\$100,000	0	\$3,179,520	\$12,218,300	Remainder of ConPlan is for program years 2021 through 2024.
HOME	public - federal	Acquisition Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$1,532,532	\$200,000	0	\$1,732,532	\$5,930,128	Remainder of ConPlan is for program years 2021 through 2024.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Financial Assistance Homelessness Prevention Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services	257,266	0	0	257,266	\$1,029,064	Remainder of ConPlan is for program years 2021 through 2024.
ESG-CV		Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Homeless Prevention	887,124				887,124	To prevent, prepare for, and respond to the coronavirus
CDBG-CV		Admin and Planning Economic Development Public Services	1,811,610				1,811,610	To prevent, prepare for, and respond to the coronavirus

Table 52 - 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, City General Funds and CoC competitive grant funds to address the objectives identified in this Plan. In addition, a portion of the City's Private Activity Bond capacity is set aside for affordable housing development each year. High-impact projects with the potential for public-private partnerships will be prioritized in order to leverage additional resources. Colorado Springs complies with federal matching requirements for both HOME and ESG funds. Colorado Springs maintained \$22,202,353 in excess HOME matching funds from prior years and uses those funds on new construction of multifamily projects, acquisition and rehab projects, and homeownership programs. ESG funds are matched by subrecipient funds.

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.

Non-profit housing and service providers rely on many sources of revenue for their operations. This includes the CoC and Homeward Pikes Peak. Both agencies pursue multiple sources of funding for housing and social service programs.

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 right-of-ways, and other municipal needs.

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		Expand/Improve Public Infrastructure & Facilities	CDBG: \$344,619	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 5 Households Assisted
2	1B. Improve Public Infrastructure Capacity	2020	2024	Non-Housing Community Development		Expand/Improve Public Infrastructure & Facilities	CDBG: \$344,619	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 5 Households Assisted
3	1C. Improve Access to Public Facilities	2020	2024	Non-Housing Community Development		Expand/Improve Public Infrastructure & Facilities	CDBG: \$344,619	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		Preserve & Develop Affordable Housing	CDBG: \$1,165,837	Homeowner Housing Rehabilitated: 50 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		Preserve & Develop Affordable Housing	HOME: \$766,266	Homeowner Housing Added: 5 Household Housing Unit Direct Financial Assistance to Homebuyers: 15 Households Assisted
6	2C. Increase Affordable Rental Housing Options	2020	2024	Affordable Housing		Preserve & Develop Affordable Housing	CDBG: \$500,000 HOME: \$766,266	Rental units constructed: 50 Household Housing Unit Rental units rehabilitated: 10 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 15 Households Assisted
7	3A. Provide Supportive Services for Special Needs	2020	2024	Homeless Non-Homeless Special Needs		Public Services & Quality of Life Improvements	CDBG: \$318,955	Public service activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 50 Households Assisted
8	3B. Provide Vital Services for LMI Households	2020	2024	Non-Housing Community Development		Public Services & Quality of Life Improvements	CDBG: \$318,955 CDBG-CV: \$1,181,161	Public service activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 50 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	4A. Direct Assistance to For-Profit Businesses	2020	2024	Non-Housing Community Development		Economic Development Opportunities	CDBG: \$241,966 CDBG-CV: \$630,449	Businesses assisted: 1
10	5A. Provide Homeless Rapid Re-Housing Assistance	2020	2024	Homeless		Homeless Housing & Supportive Services	ESG: \$45,022 ESG-CV1: \$443,562	Tenant-based rental assistance / Rapid Rehousing: 20 Households Assisted Homelessness Prevention: 10 Persons Assisted
11	5B. Provide Assistance to Homeless Shelters	2020	2024	Homeless		Homeless Housing & Supportive Services	ESG: \$212,244 ESG-CV1: \$443,562	Homeless Person Overnight Shelter: 3000 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 5 Beds

Table 53 – 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. This may include but is not limited to expansion of public water & sewer, repairs to public roads, sidewalks and stormwater management systems.
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 including but not limited to needed repairs to water & sewer systems, repairs to roads, sidewalks and storm water management systems.
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.
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 to provide down payment assistance to first time homebuyers to increase affordable housing opportunities for 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.

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. The City will help service providers prevent, prepare for, and respond to the coronavirus.
8	Goal Name	3B. Provide Vital Services for LMI Households
	Goal Description	The City will provide funding for services and programs that primarily benefit low-income individuals or families including but not limited to programs such as youth mentoring programs, fair housing promotion, alcohol and substance abuse treatment programs, and domestic violence assistance services - to name a few. The City will help service providers prevent, prepare for, and respond to the coronavirus.
9	Goal Name	4A. Direct Assistance to For-Profit Businesses
	Goal Description	The City will provide direct financial assistance to for-profit businesses to aid with facade improvements and business expansion efforts. These efforts will be concentrated in low-income neighborhoods or areas of low economic opportunity as well as provide assistance to low-income microenterprises. The City will help businesses prevent, prepare for, and respond to the coronavirus.
10	Goal Name	5A. Provide Homeless Rapid Re-Housing Assistance
	Goal Description	The City will provide funding for homeless 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. The City will help homeless service providers prevent, prepare for, and respond to the coronavirus.
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 City will help shelters prevent, prepare for, and respond to the coronavirus.

AP-35 Projects – 91.220(d)

Introduction

The following projects have been identified for funding during the 2020 program year. However, at the time of publication of this draft Consolidated Plan and Annual Action Plan, the City of Colorado Springs had not been notified by HUD of the precise amount of funding to be allocated to the City for the 2020 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 2020 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 (35%)
9	HOME: Homebuyer Assistance Program (20%)
10	HOME: TBRA (20%)
11	ESG: Homeless Housing and Services
12	CDBG-CV: Coronavirus Response

Table 54 – Project Information

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

The City of Colorado Springs has developed its strategic plan based on an analysis of the data presented in this plan and the community participation and stakeholder consultation process. Through these efforts, the City has identified five (5) priority needs and associated goals to address those needs. All projects selected for funding must address the identified goals and priority needs.

The greatest obstacle to addressing the underserved needs of the community is a lack of funding to address the affordable housing and supportive services needs of our residents.

AP-38 Project Summary

(See following table)

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: \$615,914
	Description	Administration of the CDBG Program for the City of Colorado Springs throughout the 2020 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	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 12,500 people and 170, all low-to-moderate income and the majority of which will be special needs, will benefit from CDBG funded programs during the 2020 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
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	CDBG: \$1,077,850

	Description	The City will utilize 35% of its annual CDBG allocation to support a variety of housing rehabilitation programs to support low-income homeowners throughout the City.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	170 LMI households, the majority of which will be very low income and have special needs, will benefit from these programs during the 2020 program year.
	Location Description	Citywide CDBG housing programs.
	Planned Activities	Owner occupied housing rehab
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: \$769,893
	Description	The City will utilize 25% of its annual CDBG allocation for expansion and improvements to public facilities and infrastructure including neighborhood facilities, community centers, water & sewer systems, sidewalk repairs and road repaving.
	Target Date	3/31/2021
	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: 2,500 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 5 Households 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. 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: \$461,935.50
	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	3/31/2021
	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 Public service activities for Low/Moderate Income Housing Benefit: 50 Households Assisted
	Location Description	Citywide public services for those experiencing homelessness, or at risk of becoming homeless, as well as seniors.
	Planned Activities	At this time the city has not identified specific programs to receive funding. The City published a Notice of Funding Availability (NOFA) in February 2020 to solicit applications for funding projects that improve housing stability for vulnerable populations. Over 40 applications have been received; the City will make awards available by May.
5	Project Name	CDBG: Economic Development (5%)
	Target Area	
	Goals Supported	4A. Direct Assistance to For-Profit Businesses
	Needs Addressed	Economic Development Opportunities
	Funding	CDBG: \$153,979
	Description	The City will allocate 5% of the annual CDBG allocation to support for-profit businesses throughout the community. Funds will be provided to businesses for facade improvements which in-turn should lead to increased commercial traffic and economic opportunity.
	Target Date	3/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	The city estimates assisting one small business each program year with this facade improvement program.
	Location Description	Citywide based on participant eligibility.
	Planned Activities	Direct assistance to for-profit businesses to complete façade improvements.
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: \$153,253
	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	3/31/2021
	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: \$229,880
	Description	The City, as required by HUD, will set-aside 15% of the annual HOME allocation for funding to be allocated to eligible Community Housing Development Organizations (CHDOs) for the development of affordable housing throughout the City.

	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Added: 5 Household Housing Unit
	Location Description	Citywide
	Planned Activities	At this time, the City has not identified any specific CHDO activities to receive funding. The CHDO's selected for funding will ultimately develop 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 (35%)
	Target Area	
	Goals Supported	2B. Increase Homeownership Opportunities 2C. Increase Affordable Rental Housing Options
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	HOME: \$536,386
	Description	The City will allocate 35% 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	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Rental units constructed: 250 Household Housing Units Rental units rehabilitated: 10 Household Housing Units
	Location Description	Citywide
	Planned Activities	At this time the City has not identified specific activities for funding. City staff will review all applications for funding to determine feasibility and eligibility. Developers selected to receive HOME funds must develop affordable housing for low-to-moderate income families throughout Colorado Springs. This may include the acquisition, rehabilitation or new construction of affordable housing for homeownership or rental opportunities.
	Project Name	HOME: Homebuyer Assistance Program (20%)

9	Target Area	
	Goals Supported	2B. Increase Homeownership Opportunities
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	HOME: \$306,506
	Description	The City will allocation 20% of the annual HOME allocation for direct financial assistance for first time homebuyers via the City's down payment assistance program.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	15 low to moderate income families will benefit from this program during the 2020 program year.
	Location Description	Citywide based on participant eligibility.
	Planned Activities	HOME funded Down Payment Assistance Program for first time homebuyers in Colorado Springs.
10	Project Name	HOME: TBRA (20%)
	Target Area	
	Goals Supported	2C. Increase Affordable Rental Housing Options
	Needs Addressed	Preserve & Develop Affordable Housing
	Funding	HOME: \$306,506
	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	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 35 extremely low-income individuals or families will benefit from this program during the 2020 program year.
	Location Description	Citywide based on participant eligibility.
	Planned Activities	Tenant Based Rental Assistance in partnership with the Colorado Springs Housing Authority.
	Project Name	ESG: Homeless Housing and Services

11	Target Area	
	Goals Supported	5A. Provide Homeless Rapid Re-Housing Assistance 5B. Provide Assistance to Homeless Shelters
	Needs Addressed	Homeless Housing & Supportive Services
	Funding	ESG: \$257,266 ESG-CV: \$887,124
	Description	The City will allocate the annual ESG allocation as follows: 7.5% for general administrative expenses, 60% for homeless shelter operational support, 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 homeless prevention programs. The City will make \$400,000 of ESG-CV funds available on a competitive basis. No more than 10% will go to administrative costs and the remainder will go to supporting the temporary homeless isolation shelter for clients experiencing symptoms of COVID-19.
	Target Date	3/31/2021
	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 2020 program year.
	Location Description	Citywide
	Planned Activities	General Program Administration = 7.5%; Shelter Operations = 60%; Homeless Management Information System =15%; Rapid Re-housing & Homeless Prevention Programs =17.5%

12	Project Name	CDBG-CV
	Target Area	
	Goals Supported	3A. Provide Supportive Services for Special Needs 3B. Provide Vital Services for LMI Households 4A. Direct Assistance to For-Profit Businesses
	Needs Addressed	To prevent, prepare for, and respond to the coronavirus
	Funding	\$1,811,610

Description	To prevent, prepare for, and respond to the coronavirus
Target Date	9/31/22
Estimate the number and type of families that will benefit from the proposed activities	3,000 households making 60% AMI or less 5 businesses
Location Description	Citywide
Planned Activities	Rental assistance, subsistence payments, security deposits, youth services, senior services, disability services, DV services, mental health services, food banks, health services, employment training, economic development, administration and planning

AP-50 Geographic Distribution – 91.220(f)

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

The allocation of funds geographically is based primarily on analysis of neighborhood needs, affordable housing needs and the strengths and merits of applications for competitively awarded funds. CDD staff will coordinate with Economic Development to assist with any Opportunity Zone projects that involve housing or public service uses. The allocation of funds is also considered within the context of the City’s overall budget. Whenever beneficial, the City seeks to combine block grant funds with City General Funds, other funding sources, and public works initiatives, such as the 2C program.

Community Development staff partners with a variety of city departments and local leaders, such as the City’s Infrastructure Coordination Committee, Neighborhood Services, Council boards and commissions, Colorado Springs Police Department, service providers, and the Council of Neighborhoods and Organizations, to identify areas with urgent needs and to make immediate investments to arrest neighborhood decline and improve quality of life. We look for neighborhoods in need of accessible, multimodal infrastructure, more employment opportunities, safety improvements, housing rehabilitation, new housing, and commercial improvements.

Geographic Distribution

Target Area	Percentage of Funds

Table 55 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

With no target area strategy, the Division will rely on a competitive 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 unfairly favor one neighborhood or part of the city over others. We also work extensively – and continue to build more institutional relationships – with Planning, Colorado Springs Utilities, and other entities to ensure that our projects complement other public and private initiatives in high-needs areas, maximizing neighborhood benefits.

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	85
Non-Homeless	390
Special-Needs	60
Total	535

Table 56 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	35
The Production of New Units	305
Rehab of Existing Units	180
Acquisition of Existing Units	15
Total	535

Table 57 - One Year Goals for Affordable Housing by Support Type

AP-60 Public Housing – 91.220(h)

Introduction

Colorado Springs Housing Authority (CSHA) is the largest provider of affordable housing in Colorado Springs. CSHA owns 707 units of federally funded public and senior housing, administers approximately 2,290 additional units through the federal Housing Choice Voucher Program, operates about 813 units of locally funded affordable housing not included in its public housing portfolio, is involved in approximately 1,481 units through tax credit partnerships, and administers a HOME-funded Tenant-Based Rental Assistance Program, which serves approximately 40 households. CSHA will continue its housing activities in 2020, utilizing its annual formula grant to implement these activities.

CSHA will continue to manage the Section 8 Housing Choice Voucher Program for all of El Paso County except the City of Fountain. Notably, demand for larger units, as judged by the waiting list unit size preference, suggests that the supply is drastically insufficient to meet current need, especially for two- and three-bedroom units.

CDD is entering into a multi-year CDBG funded effort to assist the Housing Authority with its Section 504 transition plan. Between 2020-2024, CSHA anticipates that (10) units in its portfolio will become accessible.

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

The Colorado Springs Housing Authority (CSHA) owns and manages a portfolio of approximately 700 rental units scattered throughout the city. As federal funding for capital improvements to public housing continues to decline, Community Development is collaborating with CSHA to address the condition of its aging housing stock. CSHA and CDD are working together to modify existing units to increase accessibility. Community Development anticipates using a portion of HOME funds allocated for the preservation of existing affordable housing to advance this effort.

In 2019, CSHA was awarded low-income housing tax credits for its proposed multifamily project in the Hillside neighborhood. The City will work with CSHA and other City departments to leverage more needed public investment in this CDBG-eligible neighborhood to create a healthier environment and more economic opportunities.

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

In prior years, the Colorado Springs Housing Authority (CSHA) administered a home buyer program designed to promote home ownership in low- to moderate-income households. The program consisted of required home buyer education and counseling and down payment assistance combined with subsidies from the Colorado Division of Housing and the Federal Home Loan Bank of Topeka, an FHA lender. This program is no longer offered by the Housing Authority, however, CDD is partnering with the Rocky

Mountain Community Land Trust (RMCLT) to administer a similar program. RMCLT will include public housing residents in its outreach and marketing efforts.

The Colorado Springs Housing Authority encourages public housing residents to become more involved in management through the Resident Advisory Boards (RAB). RAB is open to all CSHA residents. It is currently made up of 6 to 7 residents who drive the agenda and convene other tenants to discuss housing and neighborhood issues. The CSHA assists residents in implementing projects that improve their neighborhoods such as health programs, security, and resource access. The CSHA Board also holds open meetings, open to tenants and members of the general public, for opportunities to introduce issues for discussion or to share business operation decisions with the public.

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.

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

Introduction

Preventing and ending homelessness continues to be a top priority in 2020. The Division will support the Homelessness Prevention and Response Coordinator in accomplishing some key components of the City's 2019 Homelessness Initiative, a 5-point plan for immediate implementation.

Though not a direct service provider, the City of Colorado Springs engages with the PP CoC, business leaders, policymakers, and other service providers to achieve the following goals as outlined in the Pikes Peak Continuum of Care Strategic Plan:

- Stimulate sufficient supportive, affordable, and attainable housing for people inclusive of emergency and temporary housing for those in transition
- Trigger the development of programs and services that are accessible, sufficient and effective in helping people move toward maximum independence
- Build a durable and unified system focused on performance, coordination, and sustainability

The Community Development Division and the PP CoC 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.

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

Preventing and ending homelessness will continue to be a top priority in 2020 and beyond. The City and its partners made significant progress in meeting the goals of the 2014 *Initiative to End Homelessness*, most notably by establishing a strong CoC, funding and building a low barrier shelter and resource center, and expanding street outreach. Since the last Consolidated Plan, the Colorado Springs Police Department expanded its team of trauma-informed outreach professionals on its Homeless Outreach Team (HOT). The City has also continued to fund street outreach for youth.

In 2019, the City's Homelessness Prevention and Response Coordinator unveiled a short-term Homelessness Initiative, a 5-point plan for immediate implementation. 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.

Lastly, the Community Development Division manager serves on the CoC Governing Board to promote better collaboration and ensure the highest priorities are funded first. Street outreach will continue to be a component of ESG that the Division seeks to fund. City staff and PP CoC 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, to communicate current needs and conditions of this population. Members of this group work firsthand in reaching out to those experiencing homelessness or at risk of homelessness in Colorado Springs.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City and its partners have made a significant dent in the shelter needs for Colorado Springs since the last Consolidated Plan. One of the primary goals in the City's Initiative to End Homelessness was to increase access to emergency shelter, especially during winter months. Since 2014, the City, CoC, service providers, and public and private funders have been able to:

- Increase shelter capacity especially for special needs populations, including people with disabilities, elderly clients, and persons recovering from illness
- Increase the number of nightly winter shelter beds
- Simplify access requirements to increase entry into shelters
- Strengthen priority placement system (Coordinated Entry) that moves clients out of shelter and into housing quickly with essential resources like case management and rental assistance to build stability

Springs Rescue Mission, the City's first low-barrier shelter, can now offer up to 300 beds in winter for both men and women. Salvation Army has also undergone facility changes to accept single adults while also accommodating families. The primary forms of emergency shelter for families in Colorado Springs beside the few beds at Salvation Army are hotel vouchers and hosting church facilities. 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.

During the next five years, the City's federal funds will continue to support programs to provide decent and safe living environments for homeless and those at risk of becoming homeless, through funding such activities as emergency shelter operations, shelter expansion and rehabilitation, transitional housing rehabilitation, development of permanent supportive housing, tenant based rental assistance and rapid re-housing. The City will also continue to fund non-profits 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 shelters that offer supportive services such as counseling and case management to help homeless persons 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 PP CoC 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 will be evaluated annually as part of the application process.

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

The PP CoC will be rewriting a system-wide discharge policy in 2020. The City and its partners have a number of strategies to prevent homelessness to address the needs of the extremely low-income individuals and families in Colorado Springs. The City has a non-profit healthcare provider for homeless clients discharged from the hospital – it serves as hospice care for the severely ill and as a recuperative shelter for people who can move on to transitional or permanent housing. The PP CoC also seeks out more partners who can assist people exiting the prison system to ensure housing stability and decrease recidivism.

The City will continue to 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.

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

Introduction:

The City is in the process of updating its Analysis of Impediments to Fair Housing Choice, which will address steps the City can make to ensure citizens are aware of their rights under the Fair Housing Act and to help public and private housing providers and lenders level the playing field for all consumers.

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

2020 is the first year of implementation of the upcoming affordable housing plan. In order to facilitate the addition of new affordable housing units, the Division plans to carry out the following actions in 2020:

- Collaboration with the Planning Department in the revision of its accessory dwelling unit (ADU) ordinance. 2019 saw an initial introduction of new ordinance language. The issue has been taken back to the community via townhall meetings.
- Creation of an ADU Assistance Program for homeowners who want to build an ADU to rent to low-income residents.
- Collaboration with the Economic Development Division to expand the Rapid Response review team for affordable housing developments.
- Facilitate development of new tiered fee structure to reduce development fees for affordable housing developers.
- Continued advocacy for affordable housing through public forums.
- Review of land use code to ease zoning restrictions on various housing types throughout the city.
- Collaboration with the El Paso County Community Development Department and the Colorado Springs Housing Authority on the implementation of Fair Housing strategies developed through the County's 2017 Assessment of Fair Housing.
- Continue partnership with Colorado Legal Services on providing workshops for renters around fair housing, eviction, and contract literacy.
- Partner with Apartment Association of Southern Colorado to create Fair Housing content for their RentSmart program for high school seniors.
- Continue support for the Eviction Defense Project, a pro bono legal representation program administered by 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.
- Incorporate HomeCOS, and ongoing planning effort which targets strategies to ease housing

development for the low- and very low-income groups.

Discussion:

The City is in the process of updating its Analysis of Impediments to Fair Housing Choice, which will be submitted with its 2019 CAPER.

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

CDD staff continues to work with local government and service providers to build community capacity to meet underserved needs. Distribution of federal funds for housing development, public facilities, and public services is dependent upon responses from organizations to City-issued applications and Notices of Funding Availability. A lack of responses can be an obstacle for addressing underserved needs. Some agencies that apply do not have the necessary financial systems and professional staff to ensure compliance with HUD regulations and either cannot be funded or require significant technical assistance.

To address this obstacle, CDD staff has clarified its priorities, expanded subrecipient training, and continues to improve its monitoring procedures. CDD has also expanded its citizen outreach as documented in the Citizen Participation Plan; continues to work with the Continuum of Care, public and private housing developers, and other community organizations; targets populations and the local media to better ensure community awareness of funding opportunities; and specifically seeks out and selects only those projects that clearly meet the highest priorities. Staff continues to build its pool of partners and collaborators in community education and outreach.

In 2019, two CDD staff members received certification in public participation methods by the International Association of Public Practitioners (IAP2). In 2020, CDD staff will implement many of the IAP2 standards and practices to continue fostering meaningful public engagement from diverse communities.

In accordance with the City's Limited English Proficiency/Language Accessibility policies, CDD will update its Spanish-language information, program applications, policies, and other critical documents. CDD will continue to devote a portion of its CDBG and HOME administrative funds to get key documents translated and to have interpreters on hand at public meetings.

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. In 2019, CDD worked extensively with local partners on an affordable housing plan addressing many of these concerns while mainly focusing on increasing housing stock for lower income

households. In 2020, the plan will be completed and ready for implementation.

In 2020, 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.
- Provide funding for the Colorado Springs Housing Authority to move forward with 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.
- Issue 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.
- Create HOME program for ADU construction assistance to homeowner who wish to rent their ADU to low-income residents.
- Explore landlord engagement strategies to increase unit availability for low- to moderate-income voucher holders, starting with veterans as a pilot project.
- Provide funding for acquisition/rehabilitation projects to increase the number of affordable rental units.
- Explore Community Development Financial Institutions in the state and southwest region in preparation for increased economic development opportunities for the 2020-2024 Consolidated Plan period. While there are no CDFIs based in Colorado Springs, www.cdfifund.gov shows several serving the state.

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. In order 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

Increasing household income through access to jobs aligns well with the City of Colorado Springs 2020-

2024 Strategic Plan. The City of Colorado Springs 2020-2024 Strategic Plan has four platform goals:

- Promoting job creation
- Investing in infrastructure
- Building community and collaborative relationships
- Excelling city services

This Strategic Plan and Consolidated Plan builds on all of these, with the proposed investments best fitting into the third platform which covers issues of poverty, homelessness, and housing issues. HOME and CDBG investments also spur job creation, particularly through financing new multifamily construction, whose direct, indirect, and induced impact is estimated to create 161 local jobs per 100 units (National Association of Home Builders, 2015).

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 2020:

- 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.
- 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.

In 2020, the Community Development Division plans to add the following:

- Create a CDBG Economic Development program to assist small businesses in and/or serving low-income communities

Actions planned to develop institutional structure

CDD is committed to developing institutional structure by improving collaboration between City Departments, providing annual training opportunities for staff, and by developing and offering technical assistance to its partner agencies in the community. In 2020, CDD plans to take the following actions:

- Participate in land use review related to affordable housing projects.
- 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 as a means to engage subrecipients on improvements to program delivery, policy documents, and best practices.
- Collaborate with the City's Title II staff to ensure ongoing compliance with Section 504 requirements in CDD programs and activities.
- 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.gov shows several serving the state. Assist Colorado Springs' only community development corporation (CDC), Solid Rock CDC, in building capacity to carry out major projects.
- Work with the Pikes Peak Workforce Center and Small Business Development Center to help increase grant-funded construction bids to local firms, especially women and minority owned businesses

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

A CDD staff member continues to serve as an ex officio board member 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. In the coming year, CDD staff will work closely with the on revising their Written Standards to streamline requirements across ESG and CoC programs.

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 private housing developers for guidance on public financing and underwriting assistance.

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

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(l)(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 April, 2018 and April, 2020, the median sales price for a home has increased more than 17.22% from \$305,000 to \$360,000 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. In Program Year 2020, CDD is funding two homebuyer programs, one through the Rocky Mountain Community Land Trust (RMCLT) and one through Pikes Peak Habitat for Humanity. 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.

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 2020:

- 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) used residential real estate data provided by the El Paso County Assessor to determine a maximum purchase price. CDD reviewed 1,428 residential sales transactions for March 2020, representing all residential single-family sales for the Pikes Peak Region. The median sales price recorded for all records = \$343,472 and 95% of the median sales price = \$326,298. CDD will elect to use \$315,000 as an overall maximum purchase price for PY2020.

The \$315,000 maximum is based on what a household size of 3-4 persons earning up to 80% Area Median Income (AMI) can qualify for under HUD PY2020 Income Limits, assuming typical downpayment assistance from the CDD and the partnering organization, for an affordable mortgage payment. The designation of a maximum purchase price for newly constructed homes will match the \$315,000 price point above, while \$305,000 is the maximum for existing homes for PY2020. Last program year, a homebuyer at 77% AMI, household size of four, qualified for a \$280,000 home in northeast Colorado Springs, providing access to a high-ranking school district among other sought after amenities and opportunities.

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 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 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 over a two-year period. For program year 2020, the index is calculated as follows:

Take the April, 2020 median home sales price of \$360,000 and subtract the April, 2018 median home sales price of \$305,000 for a total appreciation of \$55,000. Divide the total appreciation by the median home sales price in March, 2018, to arrive at an 18.03% appreciation rate from April, 2018 to April, 2020.

A table showing the calculation of the index is included below.

Fair Return Index - Pikes Peak Association of Realtors			
Year	Month	Median Sales Prices	Percent Change
2018	April	\$ 305,000.00	
2020	April	\$ 360,000.00	
		% Change 2018-2020	18.03%
Source: https://ppar.com/Documents/stats/MarketTrends/Prices.jpg			

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

Homebuyer's Fair Return on Investment			
Homebuyer's Down Payment	\$	5,000.00	
Added Value of Work	\$	10,000.00	
Total Homeowner Investment	\$	15,000.00	Bathroom remodel
Fair Return on Investment ($\$15,000 * 18.03\%$)	\$	2,704.50	

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 typically 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 \$50,000 per year. Using a Mortgage Income Calculator, this could produce the purchase of a \$250,000 home with \$50,000 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.

While the abovementioned income tier and home price has been the average for PY2019, home purchase values (existing or newly constructed) for homebuyer programs in PY2020 will most likely range from low \$200,000’s to low \$300,000’s. 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

These aspects of the program are evident through the following example, what happens when eligible improvements considerably raise the fair market value and resale price of the home from a homebuyer in the typical 50%-70% AMI income range? The response would include, 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 values? For households earning up to 80% AMI, and considering a \$315,000 home?

Based on a Mortgage Income Calculator, a \$315,000 home with \$60,000 down payment assistance (CDD & 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 between \$58,000 and \$65,000 to qualify for a conventional loan. These income ranges are consistent with the local HUD 2020 Income Limit maximums for a household size of 3-4 persons earning up to 80% Area Median Income (AMI) \$58,800 and \$65,300, 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

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

Not applicable.

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

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

CDD is in the process of updating the written standards for providing ESG assistance to include standards for homeless prevention and make general clarifications. It is attached..

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

The 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 goes 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 CoC to determine priorities. In 2020, ESG will be allocated as follows:

Emergency Shelter Operations: No more than 60% of the entitlement award will be allocated for emergency shelter operations. 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, past performance, and planned outcomes.

HMIS: HMIS funds will be directly allocated to the new HMIS administrator – the sole source manager of the CoC HMIS as designated by the CoC Governing Board.

Rapid Rehousing/Homeless Prevention: The balance of funds will be allocated for Rapid Rehousing and/or Homeless 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 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.

5. Describe performance standards for evaluating ESG.

The written standards were adopted by the City and CoC in early 2017 and are currently undergoing more revisions to include more program components. 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 we look for from 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

CDD will continue to monitor agencies receiving ESG funds to ensure that program guidelines are being followed and ensure that all agencies actively participate in Coordinated Entry when applicable. Monitoring procedures will be conducted as outlined in the ESG Monitoring Plan. All agreements require quarterly reimbursement requests and timely expenditure of funds. In addition, before reimbursement can be made, verification of expenditures is required. Currently, subrecipients experience difficulty tracking these measures with the data tools available. The City will work with the CoC in PY 2020 to revisit the measures.

Appendix - Alternate/Local Data Sources

1	<p>Data Source Name 2000 Census, 2013-2017 ACS</p> <hr/> <p>List the name of the organization or individual who originated the data set. US Census Bureau</p> <hr/> <p>Provide a brief summary of the data set. The US Census 2000 contains detailed tables presenting data for the 48 contiguous states, Hawaii, Alaska, the District of Columbia and Puerto Rico focusing on age, sex, households, families, and housing units. These tables provide in-depth figures by race and ethnicity. The American Community Survey (ACS) is an ongoing survey that provides data every year -- giving communities the current information they need to plan investments and services. Information from the survey generates data that help determine how more than \$400 billion in federal and state funds are distributed each year. The ACS is accessed through the American FactFinder website, which provides data about the United States, Puerto Rico and the Island Areas.</p> <hr/> <p>What was the purpose for developing this data set? US Census 2000 information affects the numbers of seats a state occupies in the U.S. House of Representatives. An accurate count of residents can also benefit the community. The information the census collects helps to determine how more than \$400 billion dollars of federal funding each year is spent on infrastructure and services. Among other things, Census data is used to advocate for causes, rescue disaster victims, prevent diseases, research markets, locate pools of skilled workers and more. ACS: Information from the ACS helps determine how more than \$400 billion in federal and state funds are distributed each year to help communities, state governments, and federal programs.</p> <hr/> <p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Colorado Springs, CO</p> <hr/> <p>What time period (provide the year, and optionally month, or month and day) is covered by this data set? 2000 Census, 2013-2017 ACS 5-Year Estimates</p> <hr/> <p>What is the status of the data set (complete, in progress, or planned)? Complete</p>
2	<p>Data Source Name 2011-2015 CHAS</p>

	<p>List the name of the organization or individual who originated the data set.</p> <p>US Census Bureau, American Community Survey (ACS) and U.S. Department of Housing and Urban Development (HUD)</p>
	<p>Provide a brief summary of the data set.</p> <p>Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. At the time of writing this report, the most recent CHAS was from 2011-2015.</p>
	<p>What was the purpose for developing this data set?</p> <p>The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Colorado Springs, CO</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>2011-2015 CHAS</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
3	<p>Data Source Name</p> <p>2013-2017 ACS 5-Yr Estimates</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>US Census Bureau</p>
	<p>Provide a brief summary of the data set.</p> <p>The American Community Survey (ACS) is an ongoing survey that provides data every year -- giving communities the current information they need to plan investments and services. Information from the survey generates data that help determine how more than \$400 billion in federal and state funds are distributed each year. The ACS is accessed through the American FactFinder website, which provides data about the United States, Puerto Rico and the Island Areas.</p>
	<p>What was the purpose for developing this data set?</p> <p>Information from the ACS help determine how more than \$400 billion in federal and state funds are distributed each year to help communities, state governments, and federal programs.</p>

	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Colorado Springs, CO</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>2013-2017 ACS 5-Year Estimates</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
4	<p>Data Source Name</p> <p>2011-2015 ACS (Workers), 2015 LEHD (Jobs)</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>2011-2015 ACS and 2015 Longitudinal Employee-Household Dynamics: United States Census Bureau</p>
	<p>Provide a brief summary of the data set.</p> <p>The American Community Survey (ACS) is an ongoing survey that provides data every year -- giving communities the current information they need to plan investments and services. Information from the survey generates data that help determine how more than \$400 billion in federal and state funds are distributed each year. The ACS is accessed through the American FactFinder website, which provides data about the United States, Puerto Rico and the Island Areas.</p> <p>The Longitudinal Employer-Household Dynamics (LEHD) program is part of the Center for Economic Studies at the U.S. Census Bureau. The LEHD program produces new, cost effective, public-use information combining federal, state and Census Bureau data on employers and employees under the Local Employment Dynamics (LED) Partnership.</p>
	<p>What was the purpose for developing this data set?</p> <p>ACS: Information from the ACS help determine how more than \$400 billion in federal and state funds are distributed each year to help communities, state governments, and federal programs.</p> <p>LEHD: Information from the LEHD help state and local authorities who increasingly need detailed local information about their economies to make informed decisions. The LEHD Partnership works to fill critical data gaps and provide indicators needed by state and local authorities. LEHD's mission is to provide new dynamic information on workers, employers, and jobs with state-of-the-art confidentiality protections and no additional data collection burden.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Colorado Springs, CO</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>2011-2015 ACS (Workers), 2015 LEHD (Jobs)</p>

	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
5	<p>Data Source Name</p> <p>HUD 2019 FMR and HOME Rents</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>US Department of Housing and Urban Development (HUD)</p>
	<p>Provide a brief summary of the data set.</p> <p>Fair Market Rents (FMRs) are set by HUD and used to determine payment standard amounts for HUD Programs. HUD annually estimates FMRs for the Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas and each nonmetropolitan county.</p> <p>HOME Rents Limits are based on FMRs published by HUD. HOME Rent Limits are set to determine the rent in HOME-assisted rental units and are applicable to new HOME leases.</p>
	<p>What was the purpose for developing this data set?</p> <p>Fair Market Rents (FMRs) are used to determine payment standard amounts for HUD Programs. HOME Rent Limits are the maximum amount that may be charged for rent in HOME-assisted rental units and are applicable to new HOME leases.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Colorado Springs, CO HUD Metro FMR Area</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>2019</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
	6
	<p>List the name of the organization or individual who originated the data set.</p> <p>2000 Census, Pikes Peak Association of Realtors (Q1 2019), Colorado Springs Metro Area Apartment Vacancy and Rent Study (Q1 2019)</p>
	<p>Provide a brief summary of the data set.</p> <p>Pikes Peak Association of Realtors (Q1 2019), Colorado Springs Metro Area Apartment Vacancy and Rent Study (Q1 2019) provides the current home values and median rents in the City.</p>
	<p>What was the purpose for developing this data set?</p> <p>To inform of the current home values and rent costs in the City.</p>

	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>The City of Colorado Springs, CO</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>Q1 2019</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
7	<p>Data Source Name</p> <p>PIC (PIH Information Center)</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>The US Department of Housing and Urban Development (HUD)</p>
	<p>Provide a brief summary of the data set.</p> <p>IMS/PIC is responsible for maintaining and gathering data about all of PIH's inventories of HAs, Developments, Buildings, Units, HA Officials, HUD Offices and Field Staff and IMS/PIC Users.</p>
	<p>What was the purpose for developing this data set?</p> <p>IMS/PIC is responsible for maintaining and gathering data about all of PIH's inventories of HAs, Developments, Buildings, Units, HA Officials, HUD Offices and Field Staff and IMS/PIC Users.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>The City of Colorado Springs</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>2019</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
8	<p>Data Source Name</p> <p>2019 Housing Inventory Count CO-504</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>The US Department of Housing and Urban Development (HUD)</p>
	<p>Provide a brief summary of the data set.</p> <p>The Housing Inventory Count Reports provide a snapshot of a CoC's HIC, an inventory of housing conducted annually during the last ten days in January, and are available at the national and state level, as well as for each CoC. The reports tally the number of beds and units available on the night designated for the count by program type, and include beds dedicated to serve persons who are homeless as well as persons in Permanent Supportive Housing.</p>

	<p>What was the purpose for developing this data set?</p> <p>HIC provides the inventory of housing conducted annually during the last ten days in January. The reports tally the number of beds and units available on the night designated for the count by program type, and include beds dedicated to serve persons who are homeless.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>CoC</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>COC CO-504 2019</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>



Citizen Participation Plan

Prepared by:

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CITIZEN PARTICIPATION PLAN

INTRODUCTION

The Citizen Participation Plan (“the Plan”) sets forth the City’s policies and procedures by which it encourages local citizens to participate and comment on various housing and community development activities funded through federally funded programs. The programs include the Community Development Block Grant Program (CDBG), the HOME Investment Partnership Program (HOME), and the Emergency Solutions Grant Program (ESG).

The primary purpose of these programs is to improve communities by providing decent housing; a suitable living environment; and growing economic opportunities. All activities principally benefit low- and moderate-income people. An area is defined as a predominantly low- and moderate-income when, at a minimum, 51% of the residents of the census tract have income that do not exceed 80% of the area median income (AMI) as approved by the federal government.

The Plan was prepared in accordance with Section 104(a) of the Housing and Community Development Act of 1974, as amended. The 24 CFR 91.105 federal regulations outline the “citizen participation” requirements. This document has been established in order for the City of Colorado Springs to be in conformance with the requirements of the regulations.

The Citizen Participation Plan relates to several stages of action mentioned in law or regulation. In general, these stages or events include:

- Identification of housing and community development needs;
- Preparation of the draft use of funds for the upcoming year, known as the proposed Annual Action Plan; or the development of the new five-year Consolidated Plan;
- Formal approval by City Council of a final Annual Action Plan; or new five-year Consolidated Plan;
- Occasional necessary changes to the use of budgeted funds in an Annual Action Plan; or change to the priorities established in the five-year Consolidated Plan. If the necessary changes meet the substantial change definition, a formal Substantial Amendment will be published for citizen input and acted upon by City Council; and
- Annual Performance Report to HUD at program year completion drafted for public review and comment

ENCOURAGING PUBLIC PARTICIPATION

The Plan provides for and encourages citizens to participate in the development of the Consolidated Plan and Annual Action Plan, any substantial amendments to the Consolidated or Annual Action Plans, and the performance report. The City strives to exceed the minimum requirements set forth in regulation by consulting with stakeholders throughout the planning process as well as hosting required public hearings. Citizen Participation activities are documented in the Annual Action Plan. In summary, this Plan;

- Provides for and encourages citizen participation with particular emphasis on participation by persons who are residents of slum and blighted areas, and/or in low- and moderate-income neighborhoods or targeted revitalization areas as defined by the City;
- Provides for and encourages citizen participation by people with disabilities, including providing a copy of the Plan in a format accessible to people with disabilities, upon request;
- Provides for and encourages citizen participation by all City citizens, including minorities and non-English speaking persons, and identifies how the needs of non-English speaking residents will be met in the case of public hearings where non-English speaking residents can be reasonably expected to participate;
- Provides citizens with reasonable and timely notification and access to local meetings, information, and records relating to the City's proposed and actual use of federal Community Development Block Grant, HOME Investment Partnership Funds and Emergency Solutions Grant funds;
- Provides for technical assistance to groups and organizations representing persons of low- and moderate-income that request such assistance in developing proposals with the level and type of assistance to be determined by the City;
- Provides for public hearings to obtain citizen views and respond to proposals. The public hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodations for people with disabilities. Process includes at least one public hearing for the identification of needs and one public meeting to review proposed activities;
- Provides for digital platforms for citizens to use to read and respond to proposals and drafts. Digital copies of proposals, virtual meetings, and other online engagement tools shall be shared with adequate notice at times convenient to potential or actual beneficiaries;
- Provides procedures for gathering public comment during public health emergencies;

- Provides for review of the programs’ annual performance;
- Provides for a timely written response to written complaints and grievances where applicable;
- Staff will consult via direct mailings and other contact with local and regional organizations, assisted housing providers, public housing agencies, social service agencies, and advocacy groups, as well as their beneficiaries, to encourage further participation.

The following timeline provides a general overview of the activities required in the development of the Consolidated Plan and Annual Action Plan. The timeline is subject to change.

April	Start of program year Previous year wrap up and reconciliation
May	Consolidated Annual Performance Report (CAPER) preparation
June	CAPER comment period; submission to HUD
July	Public Input Hearing Report accomplishments
August	Consultations
September	Notice of Funding Availability
October	Project Applications Due City Council Budget Hearing
November	Project Applications Review
December	Recommendations of Awards City Council Budget approval (estimates)
January	Draft Action Plan Presentation to City Council Public Comment Period and Public Hearing
February	City Council Approval Submission to HUD (45 days before start of program year)
March	End of program year

PUBLIC HEARINGS

The City’s Community Development Division will, at a minimum, convene two public hearings to be conducted during the development of the Five-Year Consolidated Plan and/or Annual Action Plan to obtain citizens’ views and to respond to proposals and questions.

The first public hearing will be held prior to the development of the Five-Year Consolidated Plan and/or Annual Action Plan for the purpose of soliciting public comment on the affordable housing and community development needs in the City.

In addition, the City may hold additional public meetings in various neighborhoods throughout Colorado Springs, and with local and regional organizations, assisted housing providers, public housing agencies, social service agencies, and advocacy groups for the same purpose.

The second public hearing will be held during the 30-day public comment period and prior to submission to HUD.

If non-English speaking or hearing impaired residents request assistance or participate in a public hearing, the City will make arrangements to have an interpreter present given reasonable advanced notice. Instructions for making such request will be outlined in the public notice.

First Public Hearing

The City will hold the first Public Hearing to obtain citizen views on community development and affordable housing needs and to provide citizens important program information as part of the planning process for the coming program year or years. At the Public Hearing the following information will be made available:

- Accomplishments of the previous program year
- The estimated amount of HUD entitlement grant, program income, and other funds that are reasonably expected to be available during the program year;
- The range of eligible activities that may be undertaken with CDBG, HOME and ESG funds;
- The estimated amount of those funds to be used for activities that will benefit low- and moderate-income persons;
- A description of CDBG, HOME and ESG activities likely to result in displacement, plans for minimizing such displacement, and the type and level of assistance that will be made available to persons displaced.

Second Public Hearing

Once drafted and before the Five-Year Consolidated Plan and/or Annual Action Plan is adopted, the document(s) will be made available publicly for a comment period no less than 30 days. The second public hearing will be conducted during the 30-day comment period to gather comments on the proposed plan. A summary of the comments received and any comments or views not accepted and the reasons therefor shall be attached to the final Consolidated Plan or Action Plan.

NOTICE

Public Comment Period

For all documents that require public comment, notice will be given with enough time for the public to take informed action. A formal public notice will be published in a newspaper of

general circulation in the area at least fifteen (15) days prior to the opening of the public comment period, and notice will be posted on the City of Colorado Springs website at www.coloradosprings.gov/communitydevelopment. Additional public notices may include press releases, public service announcements, flyers, and emails via distribution lists that include neighborhood and other civic engagement organizations, churches, community centers, libraries, and social media.

Public Hearings

Advanced notice will be given with enough time for the public to take informed action. A formal public notice will be published in a newspaper of general circulation in the area at least fifteen (15) days prior to such public hearings, and notice will be posted on the City of Colorado Springs website at www.coloradosprings.gov/communitydevelopment. Additional public notices may include press releases, public service announcements, flyers, and emails via distribution lists that include neighborhood and other civic engagement organizations, churches, community centers, libraries, and social media.

Other Meetings

In addition to the required Public Hearings, the City will host meetings with particular emphasis on participation by special needs populations and by persons who are residents of slum and blighted areas and/or low- and moderate-income neighborhoods or geographic priority areas as defined by the City. These meetings will be open to the public and advertised with full and timely notice through local channels such as email, direct mail, social media, newsletters, and posted on the City of Colorado Springs website at www.coloradosprings.gov/communitydevelopment, but are not required to meet the Public Notice requirements for publication in a newspaper of general circulation.

Colorado Sunshine Law

To meet the requirements of the Colorado Sunshine Law (CRS 24-6-402), all meetings where three or more members of a local public body may be in attendance will be posted in the Office of the City Clerk, 30 S. Nevada Avenue, not less than 24 hours prior to the meeting.

ACCESSIBILITY

Limited English Proficiency

On October 1, 2011, the City of Colorado Springs adopted a Limited English Proficiency (LEP) Policy and related LEP Plan Guidelines. The policy states that the City will "...provide timely meaningful access for Limited English Proficiency persons to City programs and activities." And that the City "...will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and opportunity to participate in our services, activities, and programs." The LEP policy and related plan guidelines were adopted in compliance with 24 CFR Part 1, Nondiscrimination in Federally-Assisted Programs of the Department of Housing and Urban Development, Effectuation of Title VI of the Civil Rights Act of 1964.

The City provides language access services at no charge to individuals with Limited English

Proficiency (LEP) who wish to utilize programs, services, or activities offered by the City. These services may include interpreters and translation of documents. For language access assistance, contact the City's LEP Coordinator by phone at (719) 385-5906 or by email to city.communications@coloradosprings.gov.

In keeping with the City's LEP policy and guidelines, the Community Development Division has created a Division-specific Language Assistance Plan (LAP) to provide language assistance services for community members seeking access to CDD's programs and services.

Current Census data indicates that Spanish is the most commonly spoken language other than English in the Colorado Springs area. To ensure access to planning efforts, the Division does publish Public Notices in both English and Spanish. Other vital documents are available in translation upon request.

As part of an ongoing commitment to bridging gaps in communication with LEP persons, the Division will carry out the following activities:

1. Update Census language data as it becomes available;
2. Regularly review perceived LEP needs with eligible and potentially eligible citizens in our community;
3. As opportunities arise, coordinate programs with community agencies serving LEP persons;
4. Document language assistance requests.

Accommodations for Residents with Disabilities

To ensure that individuals with disabilities have reasonable opportunities for involvement in Community Development activities, the City will take the following steps:

1. Post all communications through a variety of accessible formats – email, web postings, flyers, meetings, formal hearings, etc.
2. Hold all formal Public Hearings in accessible locations and venues with auxiliary hearing aids and services for the hearing impaired. When requested, the City will provide sign language interpreters.

PLAN APPROVAL

The draft Five-Year Consolidated Plan and/or Annual Action Plan will be presented to City Council for approval before it is submitted to HUD.

PERFORMANCE REPORTS

The City of Colorado Springs will prepare a performance report for submission to HUD on an annual basis which is due within ninety (90) days of the close of the program year. Before the Consolidated Annual Performance and Evaluation Report (CAPER) is submitted to HUD, it will be made available for public review during a comment period of no less than 15 days. Citizens will be notified of the CAPER's availability through notification in a newspaper of general circulation. The notification will be published on the day the CAPER comment period begins. Comments will be considered from individuals and/or organizations received in writing. A summary of the written comments and a summary of those not accepted and the reasons therefor, will be included in the final CAPER document submitted to HUD.

CONSOLIDATED PLAN AND ANNUAL ACTION PLAN AMENDMENTS

The final Consolidated Plan and/or Annual Action Plan will be amended any time there is a change in one of the priorities presented on the HUD required Priority Table; a change in the use of money to an activity not mentioned in the final Consolidated Plan and/or Annual Action Plan; or a change in the purpose, location, scope, or beneficiaries of an activity.

Substantial Amendments

Substantial amendment means changes made in terms of purpose, scope, location, or beneficiaries. Any substantial change in the programs must be approved by City Council at a public hearing. It will then be submitted to HUD for informational purposes. In addition, any substantial change will be published in a newspaper of general circulation and citizens will be given 30 days to comment on the change(s). A summary of the written comments and a summary of those not accepted and the reasons therefore, will be included in the final document submitted to HUD. The following changes are considered substantial amendments:

1. Changes in funding by at least 20% of the amount allocated to the City's entitlement grant programs.
2. Changes in projects proposed, beneficiaries or persons served.
3. The proposed amendment deletes a project described in the Consolidated Plan.
4. The proposed amendment adds a project not described in the Consolidation Plan.

Eligible projects are allowable uses of the three federal funds (CDBG, ESG, and HOME) covered by the Citizen Participation Plan as defined in the Code of Federal Regulations Title 24 Part 570.201 of the Department of Housing and Urban Development.

Non-substantial Amendments

The Community Development Manager will approve any proposed amendment to the approved Consolidated Plan that does not meet the above definition of a substantial

amendment. No public notifications, public hearings, and public body approvals are required. A record of the transaction will be included in the budget file. Any change that comes about as a result of a disaster declared by either the Mayor or the Governor shall be included and notice of the change will be given to the public. However, in this case, the 30-day comment period is not applicable.

CITIZEN PARTICIPATION PLAN AMENDMENT PROCESS

Substantial amendments to the Citizen Participation Plan shall be made only after the public has been notified of the City's intent to amend the Plan. The public notice of the City's intent to substantially amend the Plan shall be published no less than fifteen (15) days prior to a 30-day public comment and review period. The City may publish its intent to substantially amend along with the proposed dates for the 30-day public comment and review period in a single public notice.

COVID-19 EXCEPTIONS

HUD recognizes the efforts to contain COVID-19 require limiting public gatherings, such as those often used to obtain citizen participation, and that there is a need to respond quickly to the growing spread and effects of COVID-19. Therefore, HUD has waived 24 CFR 91.105(c)(2) and (k) and 24 CFR 91.401 as specified below to allow the City of Colorado Springs to determine what constitutes reasonable notice and opportunity to comment given the circumstances related to COVID-19.

The City of Colorado Springs may use alternative methods for public participation and will allow for reasonable notification and access for citizens. This authority is in effect until El Paso County Public Health has published notice that social distancing measures are no longer required and the City of Colorado Springs has released guidance allowing in-person public meetings.

The 30-day minimum required public comment period is waived for substantial amendments, provided no less than 5 days are provided for public comments on each substantial amendment. This authority is in effect until El Paso County Public Health has published notice that social distancing measures are no longer required and the City of Colorado Springs has released guidance allowing in-person public meetings.

The City of Colorado Springs will implement a public comment period of no fewer than 5 days. Notice of comment periods may be 24 hours in advance through at least one medium. Citizens will receive reasonable notices of opportunities to comment through newspaper notice, email notification and the City's website (www.coloradosprings.gov). The City of Colorado Springs will provide all proposed changes through the Community Development website, as well as timely response to any comments received by email in a timely manner.

AFFIRMATIVELY FURTHERING FAIR HOUSING

On July 15, 2016, the U.S. Department of Housing and Urban Development (HUD) released a final rule to equip communities that receive HUD funding with the data and tools that will help them to meet long-standing fair housing obligations in their use of HUD funds. This rule clarifies and simplifies existing fair housing obligations for HUD grantees to analyze their fair housing landscape and set locally-determined fair housing priorities and goals through an Assessment of Fair Housing (AFH).

The City must provide opportunities for community participation throughout the development of the AFH. At a minimum, the City will:

1. Make the HUD-provided data and any other data to be included in the AFH available to its residents, public agencies, and other interested parties;
2. Publish the proposed AFH in a manner that affords residents and others the opportunity to examine its content and submit comments;
3. Conform to all civil rights related program requirements concerning outreach to residents with disabilities and to the Limited English Proficiency (LEP) population;
4. Provide for at least one public hearing during the development of the AFH; and
5. Provide a period of not less than 30 calendar days to receive comments from residents.

The draft Assessment of Fair Housing report will be presented to City Council for approval before it is submitted to HUD.

TECHNICAL ASSISTANCE

Technical assistance may be requested in writing by neighborhood organizations, advisory groups, project area organizations, groups of low- and moderate-income persons and/or groups of residents of blighted neighborhoods/communities.

This assistance may be requested for the purposes of adequately participating in planning, implementing and assessing the programs, developing proposals for funding, and/or in carrying out CDBG/HOME/ESG Program activities. The level and type of necessary assistance will be determined by the City. If necessary, assistance will be provided by specialists selected by the City.

All written correspondence requesting technical assistance should be addressed to the Community Development Division. All requests should specify the name of the group or organization, a contact person, the nature of technical assistance requested, immediate problems and the reason for the request.

RESIDENTIAL ANTI-DISPLACEMENT & RELOCATION ASSISTANCE PLAN

Adapted from Appendix 34 HUD URA Handbook 1378 CHG-11

This Residential Anti-displacement and Relocation Assistance Plan (RARAP) is adopted by

the City of Colorado Springs, Colorado, Community Development Division (CDD), in accordance with the Housing and Community Development Act of 1974, as amended; and HUD regulations at 24 CFR 42.325 and is applicable to CDBG and/or HOME-assisted projects.

Minimize Displacement

Consistent with the goals and objectives of activities assisted under the Act, CDD will take the following steps to minimize the direct and indirect displacement of persons from their homes:

- Provide technical assistance to subrecipients in order to ensure compliance with URA and Section 104(d) requirements.
- Require subrecipients to stage rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.
- Require subrecipients to arrange for facilities to house persons who must be relocated temporarily during rehabilitation.
- Where feasible, give priority to rehabilitation of housing, as opposed to demolition, to avoid displacement.
- If feasible, demolish or convert only dwelling units that are not occupied or vacant occupiable dwelling units, especially those units which are “lower-income dwelling units” (as defined in 24 CFR 42.305), or structures that have not been used for residential purposes.

Relocation Assistance to Displaced Persons

CDD or its subrecipients will provide relocation assistance for lower-income tenants who, in connection with an activity assisted under the CDBG and/or HOME programs, move permanently or move personal property from real property as a direct result of the demolition of any dwelling unit or the conversion of a lower-income dwelling unit in accordance with the requirements of 24 CFR 42.350. A displaced person who is not a lower-income tenant, will be provided relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR Part 24.

One-for-One Replacement of Lower-Income Dwelling Units

CDD or its subrecipients will replace all occupied and vacant occupiable lower-income dwelling units demolished or converted to a use other than lower-income housing in

connection with a project assisted with funds provided under the CDBG and/or HOME programs in accordance with 24 CFR 42.375.

Before entering into a contract committing CDD to provide funds for a project that will directly result in demolition or conversion of lower-income dwelling units, CDD will make public by publishing in a newspaper of general circulation, and submitting an affidavit of publication to the HUD Field Office, the following information in writing:

1. A description of the proposed assisted project;
2. The address, number of bedrooms, and location on a map of lower-income dwelling units that will be demolished or converted to a use other than as lower-income dwelling units as a result of an assisted project;
3. A time schedule for the commencement and completion of the demolition or conversion;
4. To the extent known, the address, number of lower-income dwelling units by size (number of bedrooms) and location on a map of the replacement lower-income housing that has been or will be provided;
5. The source of funding and a time schedule for the provision of the replacement dwelling units;
6. The basis for concluding that each replacement dwelling unit is designated to remain a lower-income dwelling unit for at least 10 years from the date of initial occupancy; and
7. Information demonstrating that any proposed replacement of lower-income dwelling units with smaller dwelling units (e.g., a 2-bedroom unit with two 1-bedroom units), or any proposed replacement of efficiency or single-room occupancy (SRO) units with units of a different size, is appropriate and consistent with the housing needs and priorities identified in the Community Development Division's HUD-approved Consolidated Plan and 24 CFR 42.375(b).

To the extent that the specific location of the replacement dwelling units and other data in items 4 through 7 are not available at the time of the general submission, CDD will identify the general location of such dwelling units on a map and complete the disclosure and submission requirements as soon as the specific data is available.

Replacement not Required Based on Unit Availability

Under 24 CFR 42.375(d), CDD may submit a request to HUD for a determination that the one-for-one replacement requirement does not apply based on objective data that there is an adequate supply of vacant lower-income dwelling units in standard condition available on a non-discriminatory basis within the area.

Contacts

CDD and its subrecipients are responsible for tracking the replacement of lower income dwelling units and ensuring that they are provided within the required period.

CDD and its subrecipients are responsible for providing relocation payments and other relocation assistance to any lower-income person displaced by the demolition of any dwelling unit or the conversion of lower-income dwelling units to another use.

CDD can be contacted at the following number: 719-385-5912. Citizens who are deaf and hard of hearing may dial 711 or 800-659-3656 Relay Colorado (Voice) or 800-659-2656 (TTY). CDD may refer displaced persons to the outside agencies directly responsible for individual projects.

AVAILABILITY TO THE PUBLIC

All public information related to the citizen participation plan, the Assessment of Fair Housing (and its predecessor, Analysis of Impediments to Fair Housing), the five-year consolidated plan and/or annual plan, substantial amendments and performance report is available for review, during regular business hours, at the Community Development Division, Suite 701, 30 South Nevada Avenue, Colorado Springs, CO 80903, City Hall, Community and Senior Centers, Penrose Library and on the City's website at www.coloradosprings.gov/community-development.

The City also offers, to all non-speaking English persons and upon written request, translated versions of all public hearing notices. Non-English speaking persons who desire translated public notices should formally request these items from the Community Development Division during regular business hours. This Citizen Participation Plan is currently printed in English and in Spanish.

SECTION 504 – POLICY OF NON-DISCRIMINATION

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Colorado Springs (City) will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment

The City does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication:

The City will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in City's programs, services, and activities, including qualified sign language interpreters and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Anyone requiring an auxiliary aid or service for effective communication to participate in a program, service, or activity should make the request as soon as possible but no later than 48 hours before the scheduled event.

Modifications to Programs and Services:

The City will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in City offices, even where pets are generally prohibited.

The ADA does not require the City to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Concerns that a program, service, or activity of the City of Colorado Springs is not accessible to persons with disabilities should be directed to:

Via coloradosprings.gov

[Online Reporting](#)

[Download the Mobile App](#)

Via regular mail:

Office of Accessibility

City of Colorado Springs

PO Box 1575 MC 325

Colorado Springs, CO 80901

Via email:

ADAAcompliance@coloradosprings.gov

Via telephone to:

ADA Title II Coordinator - **719-385-5175**

Via Relay Colorado (Deaf and Hearing Impaired Citizens):

Contact the City via Relay Colorado: 1-800-659-3656 (voice) or 1-800-659-2656 (TTY). You may also Dial 711 throughout the United States to reach all Telecommunications Relay Services; there is no service fee, only applicable charges if calling long distance.

The City will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

ACCESS TO RECORDS

Citizens, public agencies, and other interested groups will be given reasonable and timely access to the Consolidated Plan, substantial amendments, the performance report, and other information and records regarding the Consolidated Plan and use of funding during the preceding five (5) years. Program records are available for citizen review at the Community Development Division, 30 South Nevada Avenue, Colorado Springs, CO 80903 and on the City's website at www.coloradosprings.gov/community-development. Such documents include the following:

- Proposed and final five-year Consolidated Plan
- Proposed and final Annual Action Plans
- Substantial Amendments
- Performance Reports
- Citizen Participation Plan
- Records of public hearings and public meetings

COMPLAINT PROCESS

Public complaints will be received in writing, via email and orally at public hearings about the City's citizen participation process, the Five-Year Consolidated Plan, Assessment of Fair Housing, Annual Action Plan, any amendments and the Consolidated Annual Performance and Evaluation Report. Complaints will receive careful consideration and will be answered in writing within fifteen (15) working days of receipt of the complaint. If the complainant is unable to file a complaint due to disability, alternative filing methods will be allowed. Written complaints should be sent to the Community Development Division:

- Via telephone at (719) 385-5912
- Through e-mail at communitydevelopment@coloradosprings.gov
- In writing at 30 South Nevada Avenue, Suite 701, Colorado Springs, CO 80903.

SECTION 108 LOAN PROGRAM

Applications for assistance filed by the City for Section 108 loan guarantee assistance

authorized under HUD regulation 24 CFR Part 570, Subpart M, are subject to all provisions set forth within the Citizen Participation Plan. Such applications for Section 108 loan guarantees may be included as part of the process for obtaining CDBG/HOME/ESG entitlement funds, or may be undertaken separately anytime during the program year. The required public hearing to inform citizens of program requirements will be carried out by the Community Development Division.

We are pledged to the letter and spirit of U.S. policy for the achievement of equal housing opportunity throughout the Nation. We encourage and support an affirmative advertising and marketing program in which there are no barriers to obtaining housing because of race, color, religion, sex, handicap, familial status, or national origin.

