

DRAFT CP-12/12-12/26/19

# Consolidated Annual Performance Evaluation Report

2018-2019



City of Loveland

Community Partnership Office

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970-962-2517

## CR-05 - Goals and Outcomes

### Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

During the fourth year of the 2015-2020 Consolidated Plan, the City of Loveland expected to complete at least 20% of the 5-year goals. By the end of the program year, the goals of new single-family housing, public services, and rehabilitation of public facilities have been met in full. The rehabilitation of single family housing goal will be completed by the end of the five years. The goals of new multi-family housing, housing for homeless residents and rehabilitation of multi-family housing will likely not be met by the end of the Consolidated Plan, although progress has been made that has significantly improved the lives of many Loveland residents. Specific accomplishments by type of project to date include the following:

**NEW HOUSING.** 60 new multi-family units for people living between 30% and 60% of the area median income and 10 units for now homeless veterans were completed. An additional 60 units will be completed during the five years of this Consolidated Plan. The 120 units are less than half of the expected 300 and the 10 units of housing for homeless residents unfortunately fall short of the goal of 30. 78 new single-family homes were built for home owners living at or below 70% of the area median income. Because these units were not funded with CDBG, they have not been entered into IDIS and will appear only in the narrative in this report.

**PUBLIC FACILITIES.** Three organizations received funding for five public facility projects to date. The goal was met after the second year. 249 people have received services from the five projects.

**PUBLIC SERVICES.** To date, 8,675 people have been served with public service funding, far exceeding the goal of 5,000.

**HOUSING REHABILITATION.** 653 people received housing rehabilitation: 531 single-family occupants with a five year goal of 600, and 122 multi-family occupants with a five year goal of 200. The single-family goal will be met by the end of the Consolidated Plan. The multi-family goal likely will not.

The Affordable Housing and Human Services Commissions will use the accomplishment data of the five year Consolidated Plan to engage in more accurate goal setting for the next five year as we begin working on the 2020-2024 Consolidated Plan.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Create new affordable housing	Affordable Housing Public Housing Homeless	CDBG: \$285885	Rental units constructed	Household Housing Unit	300	60	20.00%	60	0	0.00%
Create new affordable housing	Affordable Housing Public Housing Homeless	CDBG: \$285885	Homeowner Housing Added	Household Housing Unit	75	0	0.00%			
Create new affordable housing	Affordable Housing Public Housing Homeless	CDBG: \$285885	Housing for Homeless added	Household Housing Unit	30	10	33.33%			

Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2	5	250.00%	0	41
New or rehabilitated public facilities	New or rehabilitated public facilities	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0			
Public service activities	Homeless Non-Homeless Special Needs	CDBG: \$55454	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	8675	173.50%	508
Public service activities	Homeless Non-Homeless Special Needs	CDBG: \$55454	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	0	0
Public service activities	Homeless Non-Homeless Special Needs	CDBG: \$55454	Homeless Person Overnight Shelter	Persons Assisted	0	0	0	0
Public service activities	Homeless Non-Homeless Special Needs	CDBG: \$55454	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0	0

Rehabilitate affordable housing	Affordable Housing Public Housing	CDBG: \$28453	Rental units rehabilitated	Household Housing Unit	200	122	61.00%	0	24	
Rehabilitate affordable housing	Affordable Housing Public Housing	CDBG: \$28453	Homeowner Housing Rehabilitated	Household Housing Unit	600	531	88.50%	135	245	181.48%
Rehabilitate affordable housing	Affordable Housing Public Housing	CDBG: \$28453	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Rehabilitate affordable housing	Affordable Housing Public Housing	CDBG: \$28453	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

**Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

Additional information about accomplishments during the 2018-2019 program year is described in the order the data appears above.

**NEW MULTI-FAMILY HOUSING.** The highest priority for City of Loveland CDBG funding is building new affordable single or multi-family housing, or new housing for the homeless. A request for funding from the Loveland Housing Authority to build 60 units of new housing received a 4% Low Income Housing Tax Credit award in 2019, and will be completed and fully occupied in 2020. CDBG was used to purchase water rights, which happens early in the building process. This housing project is likely to house people exiting homelessness with new affordable studio apartments even though none of the units have been set-aside for this purpose.

**PUBLIC FACILITY REHABILITATION.** The last priority for CDBG funding is to invest in public facilities. While no public facility projects were funded with PY 2018-2019 CDBG, one project with 41 people served was closed. Result data from that project was entered into the cell for public facilities even though PY 2017-2018 was used. DIS showed 66 people served, which was from a PY 2016-2017 project that was closed in August

of 2018.

**PUBLIC SERVICE ACTIVITIES.** The third priority is to provide a public service. During the program year, 401 residents accessed services from three agencies: 173 survivors of domestic violence received shelter from the Loveland Safe House, 216 homeless residents received services from the Murphy Center day center, and 12 formerly homeless veterans received support and assistance while living in Supportive Housing. All three organizations served fewer people than expected, although the percentages served are not concerning to the Community Partnership Office. Alternatives to Violence met their goal by 75%. 57 fewer people used the safe house. The Murphy Center met their goal by 86%: 34 fewer Loveland residents used the day center. Loveland Housing Authority met their goal by 43%, which means that expected turn-over did not occur and the original residents are stably housed.

**HOUSING REHABILITATION.** The second priority is rehabilitating housing to ensure residents are able to remain in their homes. To date, PY 2018-2019 funding has been used to rehabilitate 105 units of single-family and multi-family housing. An additional 164 units (152 single-family, 12 multi-family) units were rehabilitated from prior grant years that were completed and closed during the PY 2018-2019. One of those activities (IDIS #295) is still open. The numbers above have been changed to reflect actual results. Original numbers include projects that were completed and closed prior to the 2018-2019 program year.

## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).  
91.520(a)

	CDBG
White	423
Black or African American	21
Asian	14
American Indian or American Native	16
Native Hawaiian or Other Pacific Islander	2
<b>Total</b>	<b>476</b>
Hispanic	88
Not Hispanic	418

Table 2 – Table of assistance to racial and ethnic populations by source of funds

### Narrative

The CAPER was started prior to entering final reports into IDIS for some organizations and updating reports for others. The attached (Fair Housing) data shows a comparison of sub-recipient race/ethnicity data compared to Loveland using American Fact Finder 5-year data (2011-2015) and information from the point-in-time homeless count. City of Loveland sub-recipients served fewer White, Asian, American Indian/White, African American & White and Multi-racial clients, but more Hispanic, Black, Native Alaskan, Pacific Island, American India/Black and Asian/White. See the attached Fair Housing report: 2019 Loveland Actions for information about race/ethnicity data moving forward.

The racial and ethnic composition of families data was updated to reflect information from all 2018-2019 projects. See attached FHEO Race.Ethnicity spreadsheet. Note that the table above does not include a category for Multi-Racial and excludes 30 people. The total number served is 506, of which 88 report as Hispanic.

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	388,037	388,037

Table 3 - Resources Made Available

### Narrative

The City of Loveland received a 2018-2019 CDBG award of \$369,396 and accessed \$18,343.51 in program income for additional administration funding. The balance of the \$119,019.51 program income received will be spent in PY 2019-2020.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

### Narrative

The City of Loveland does not distribute grant funding based on a Target Area. Instead, all funding is used for housing or services for residents living at or below 80% of the Area Median Income.

## **Leveraging**

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

The attached FHEO data spreadsheet shows that City of Loveland CDBG leveraged close to \$21 in other funding for Loveland projects. Listed are those projects that were funded and/or closed during the 2018-2019 program years.

## CR-20 - Affordable Housing 91.520(b)

**Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.**

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	60	0
Number of Special-Needs households to be provided affordable housing units	135	105
<b>Total</b>	<b>195</b>	<b>105</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	60	0
Number of households supported through Rehab of Existing Units	135	105
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>195</b>	<b>105</b>

Table 6 – Number of Households Supported

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

The 60 new expected housing units will be completed in 2020 and the rehabilitation of single-family units will meet the goal before the activity is closed.

**Discuss how these outcomes will impact future annual action plans.**

The City of Loveland hoped to complete 30 units of new housing for homeless residents over the five years of the Consolidated Plan and produced 10 to date. Although Loveland has not created many new homes for homeless residents, the Northern Colorado Continuum of Care has housed close to 720 homeless individuals and families over the last 3.75 years with new units produced by Housing Catalyst in Fort Collins, Catholic Charities in Greeley, and additional Housing Choice Vouchers and marijuana tax

funding from the Division of Housing. Northern Colorado hopes to be the first in the state to end veteran homeless.

The City of Loveland Affordable Housing and Human Services Commissions have a better idea of the types of projects they will be able to fund over the next five years making the predicted outcomes more reliable.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	425	0
Low-income	61	0
Moderate-income	20	0
<b>Total</b>	<b>506</b>	<b>0</b>

Table 7 ~ Number of Households Served

#### **Narrative Information**

These numbers would match CR-10 if there were another row to show customers that self-reported multi-racial.

**CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Reaching out to homeless persons was accomplished by the Community Partnership Office during the annual point-in-time homeless count the week of January 28, 2019, Loveland Connect on October 11, 2019, and by volunteering to serve lunch at the Community Kitchen for the first half of the year. A meeting with local providers to discuss how to keep newly housed homeless individuals from returning to homelessness has also increased Community Partnership Office access to people to assess their individual needs. Several services providers, including Disabled Resource Services, Community Kitchen, One Community One Family, SummitStone Health Partners, Salvation Army, House of Neighborly Service and the City of Loveland Jumpstart program (alternative sentencing) have regular access to homeless (sheltered and unsheltered) persons to assess their needs and ensure they are on the Coordinated Entry By-Name List.

Northern Colorado has a robust Coordinated Entry system to ensure that people experiencing homelessness can get connected to housing and service providers. Currently, 1,568 veterans, non-veteran adults, families and youth have been assessed, 720 have been housed, and 633 are waiting. The balance of 215 people have left the area.

**Addressing the emergency shelter and transitional housing needs of homeless persons**

Two programs of the House of Neighborly Service receive direct funding to serve homeless adults and homeless families. The family program provides year-around shelter in local churches and the individual program provides shelter when the night temperature drops to 20 degrees from November through March. Loveland currently has seven units of transitional housing. The number has not increased for many years.

The City of Loveland does not currently provide any emergency shelter beds but will be looking at options over the next six months to a year to ensure that all of Loveland's homeless residents have access to the services they need.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that**

**address housing, health, social services, employment, education, or youth needs**

The City of Loveland funds Volunteers of America and the Loveland Housing Authority, both of which work to keep people housed through home rehabilitation. The City of Loveland also funds agencies that provide rental assistance (Neighbor to Neighbor) or housing (Alternatives to Violence, House of Neighborly Service, Matthews House), although not always with CDBG public service funding. Other community partners working to keep people housed include the Salvation Army and SummitStone Health Partners. The Community Partnership Office does not work with publicly funded institutions and systems of care to help people from becoming homeless after they have been discharged.

**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 Community Partnership Office staff have been working with regional partners on Coordinated Entry since 2016. Since February of 2016, northern Colorado partners have housed 53.2% of all homeless veterans (358 people), non-veteran adults (162 people), families (79 families) and youth (6) for a total of 720 people with 633 still waiting.

The City of Loveland hired a consultant group from the Burnes Center on Poverty & Homelessness to complete a Homeless Strategic Plan. The Community Partnership Office is now working with City Council to adopt the plan and determine next steps.

## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

The City of Loveland addresses public housing needs by allocating grant and other funding to organizations that provide housing. On December 17, 2019, the City of Loveland may waive close to \$1.2 million in building and development fees for the Loveland Housing Authority for 69 units of multi-family housing. This project also received \$200,000 in CDBG. Last year, the Loveland Housing Authority received a waiver of building and development fees totaling \$1.25 million for 60 units of new housing, \$257,414 for 30 units of skilled nursing and \$97,575 to rehabilitate 60 units of affordable multi-family housing.

City Council also waived \$190,599 for seven new single-family homes for Loveland Habitat for Humanity in 2019, and \$167,895 for six homes in 2018. These fee waiver amounts are vital to increasing the affordable housing stock in Loveland given the small amount of CDBG received each year.

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

The Loveland Housing Authority recently started a new non-profit organization. Aspire 3D values resident voice and encourages resident driven solutions to community level problems. For this reason, the organization has launched a Leadership Council in three of the communities we work in: Orchard Place, The Edge and Silver Leaf. Residents meet monthly to help identify community strengths and challenges, develop and implement solutions, and build social connection. This past year, these three communities, as well as the Mirasol senior community, created plans for a Colorado Health Foundation grant titled "Activating Places and Spaces." At Orchard Place, residents hosted a series of safety events throughout the summer and initiated movie nights and a community safety committee. They also host their own resource fairs so that other households can come and learn about resources in the community. In addition, residents at these three communities are participating in annual community needs assessments including a food insecurity survey. Residents are surveyed individually through an interview process and then invited to participate in focus groups to help improve food security for themselves and their neighbors. This approach to resident engagement ensures that programs and activities better meet the needs of unique communities and are more sustainable, long term solutions. While these actions may not directly result in homeownership, they are expected to stabilize families to be able to move on from low income housing.

### **Actions taken to provide assistance to troubled PHAs**

The Loveland Housing Authority is not designated as troubled.

### **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken 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. 91.220 (j); 91.320 (i)**

The City's strategy to remove barriers and provide incentives to developers and builders of affordable housing include use tax credits and the waiver or reduction of development fees, capital expansion and building permit fees. The City of Loveland adopted an affordable housing code to encourage the building of low-income housing in 1994 and updated incentives for single-family and multi-housing projects in 2017. The Planning and Zoning codes were re-written and officially adopted at the start of 2019 and now include the ability to build homes as small as 400 square feet with minimal setbacks and a reduction in parking. These changes are designed to make housing more affordable and additional work is underway to ensure the changes work.

As stated above, the Loveland City Council waives building and development fees for Loveland Habitat for Humanity and the Loveland Housing Authority each year. In 2019, a for-profit company started discussing incentives for additional senior housing in Loveland. This company will have access to the same incentives enjoyed by our non-profit partners.

### **Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

The Community Partnership Office held the eight annual Loveland Homeless Connect event on October 11, 2019. 241 homeless and near homeless residents received information about housing and other social services, direct health and dental care, pet services, a hair cut, many other services and two meals provided by 50 service agencies.

Community Partnership Office staff continues to discuss program accessibility with funded agencies, including the manner in which the working poor access services that are generally only available during regular business hours. The Human Services and Affordable Housing Commissions continue to discuss program improvement during the annual grant process to better understand the experience of non-profit customers. In 2019, the Community Partnership Office contracted with an organization to assist with the process of bridging the gap between funding and services and will assist organizations with mandatory policies, including a customer grievance policy and procedure. They are also assisting the Human Services Commission decide if funding should continue to be distributed in the manner in which it has been for decades, or if the commission would like to narrow their focus. That decision will be made in 2020, in conjunction with work around the Consolidated Plan.

### **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

The Community Partnership Office requires that all activities funded with CDBG dollars comply with

federal regulations concerning lead-based paint.

**Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

The City of Loveland allocates \$500,000 in grant funding to services organizations in addition to CDBG public service dollars. All funded agencies work with low to moderate income individuals with most individuals living at or below the poverty line. In 2020, that amount will be reduced to \$460,000

The Community Partnership Office will work to connect anyone who calls the office to local resources and has kept several people housed through advocacy.

**Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

The Community Partnership Office continues to participate in the Northern Colorado Continuum of Care as a governing board member, member of the point-in-time count working group and NOFA committee to help build institutional structures around accessing homeless programs and services. Staff also continue to provide training for local non-profits to increase access to services as stated below.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

The Community Partnership Office works to ensure that funded services are accessible to the residents who need them. To that end, the office continues holding a monthly meeting to have agency representatives share their program information with other agencies. Questions asked are the type of identification needed for services, hours of operation, and whether the agency serves undocumented individuals. The goal of the meetings is to ensure that organizations provide a warm hand-off to another agency versus providing a referral. Both housing and service agencies participate in these meetings.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

The City of Loveland completed an Assessment of Fair Housing in 2018.

The attached Fair Housing 2019 Loveland Actions document will be updated regularly and submitted to the Office of Fair Housing to show how the City of Loveland Community Partnership Office is working to meet the laws and regulations listed in the document.

### **CR-40 - Monitoring 91.220 and 91.230**

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

The Community Partnership Office strives to complete monitoring of all projects within six months of project completion and is almost up-to-date with that result. Minority business outreach information is gathered at least quarterly.

### **Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The City of Loveland allows 15 days for citizens to comment on year-end performance reports. Information is placed in the local newspaper and facebook. A hard-copy of the year-end report is available in hard-copy and large print. The advertisement placed in the local paper is in both English and Spanish.

### **CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

Program objectives have not been changed since the Consolidated Plan was submitted in 2015.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

FHEO CAPER Supplemental - 2018-2019

CAPER Supplemental - 2017-2018

Agency	Program	IDIS	1	Hispanic:	2	3	4	5	6	7	8	9	10	Total Clients	Notes
Alternatives to Violence	Housing Public Svc	289	214	47	14	3	1							5	
Murphy Center/Homeless Gear	Homelessness Public Svc	290	230	28	16	1	10							16	237
House of Neighborly Service	Food Public Svc	291	5287	1391	257	34	97	30	8	50	5	39		170	273
Volunteers of America	Housing Rehab	292	131	4											5977
Alternatives to Violence	Public Facility Rehab	294	30	13	7									4	131
Loveland Housing Authority	Home Rehab	295	15	1		1									41
Alternatives to Violence	Housing Public Svc	297	136	45	9	9	1	2						16	Not complete data
Homeward Alliance/Murcr	Homelessness Public Svc	298	171	38	11	5	15							14	Complete data. Not yet closed
Loveland Housing Authority	Housing Public Svc	299	11	1										12	
Volunteers of America	Housing Rehab	300	105	4										105	
Loveland Housing Authority	New Housing	301												0	No data yet
<b>TOTALS for PY 2018-2019 funded projects only for QCR-10</b>			<b>423</b>	<b>88</b>	<b>21</b>	<b>14</b>	<b>16</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>30</b>	
			6330	1572	315	53	124	32	8	50	5	39		225	
			88.1%	21.9%	4.4%	0.7%	1.7%	0.4%	0.1%	0.7%	0.1%	0.5%		3.1%	
			93.97%	11.91%	0.41%	0.97%	0.60%	0.14%	0.52%	0.74%	0.50%	0.16%		3.05%	
														2242	
															AMERICAN FACT FINDER (5-year data)
															Agencies served fewer than Loveland average by more than 10%
															7181

<b>CATEGORIES</b>															
1: White															
2: Black/African American															
3: Asian															
4: American Indian/Alaskan Native															
5: Native Hawaiian/Other Pacific Islander															
6: American Indian/Native Alaskan & White															
7: Asian & White															
8: Black/African American & White															
9: Amer. Indian/Alaskan Native & Black/African Amer.															
10: Other Multi-racial															

<b>Loveland city, Colorado</b>															
Estimate	Margin of Error														
Total:	+/-603														
Not Hispanic or Latino:															
White alone	+/-710														+/-746
Black or African American alone	+/-124														+/-863
American Indian and Alaska Native alone	+/-124														+/-124
Asian alone	+/-133														+/-133
Native Hawaiian and Other Pacific Islander alone	+/-221														+/-221
Some other race alone	+/-72														+/-72
Two or more races:															
Two races including Some other race	+/-25														+/-25
Two races excluding Some other race, and three or more races	+/-387														+/-387
Two or more races:	+/-64														+/-64
Hispanic or Latino:	+/-371														+/-371
White alone	+/-743														+/-743
Black or African American alone	+/-243														+/-243
American Indian and Alaska Native alone	+/-26														+/-26
Asian alone	+/-123														+/-123
Native Hawaiian and Other Pacific Islander alone	+/-11														+/-11
Some other race alone	+/-28														+/-28
Two or more races:	+/-421														+/-421
Population of four or more races	+/-379														+/-379
Two races including Some other race	+/-284														+/-284
Two races excluding Some other race, and three or more races	+/-253														+/-253

7181

TOTALS

Sub-recipient percentages

AMERICAN FACT FINDER (%2003, B03002)

AMERICAN FACT FINDER (5-year data)

Agencies served fewer than Loveland average by more than 10%

7181

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AMERICAN FACT FINDER (%2003, B03002)

AMERICAN FACT FINDER (5-year data)

Agencies served fewer than Loveland average by more than 10%

7181

TOTALS

Sub-recipient percentages

AMERICAN FACT FINDER (%2003, B03002)

AMERICAN FACT FINDER (5-year data)

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TOTALS

### Race/Ethnicity by Agency by Project

### Highlighted red are race/ethnicities that are not proportionally seeking services from these agencies.

Agency	Program	IDIS	Highlighted red are race/ethnicities that are not proportionally seeking services from these agencies.										Total Clients	Notes			
			1	Hispanic	2	3	4	5	6	7	8	9	10				
Alternatives to Violence	Housing Public Svc	289	214	47	14	3	1	0	0	0	0	0	0	5	237		
			90.3%	19.8%	5.9%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.1%	Sub-recipient percentages		
			93.97%	11.91%	0.41%	0.97%	0.60%	0.14%	0.52%	0.74%	0.50%	0.16%	0.16%	3.01%	AMERICAN FACT FINDER % (CO2003, B03002)		
			68936	8738	298	713	439	106	385	545	368	115	115	2242	AMERICAN FACT FINDER (5-year data)		
						29.5%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	31.0%	Agencies served fewer than Loveland average by more than 10%		
Murphy Center/Homeless Gear	Homelessness Public Svc	290	230	28	16	1	10	0	0	0	0	0	0	16	273		
			84.2%	10.3%	5.9%	0.4%	3.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.9%	Sub-recipient percentages		
			93.97%	11.91%	0.41%	0.97%	0.60%	0.14%	0.52%	0.74%	0.50%	0.16%	0.16%	3.06%	AMERICAN FACT FINDER % (CO2003, B03002)		
			68936	8738	298	713	439	106	385	545	368	115	115	2242	AMERICAN FACT FINDER (5-year data)		
House of Neighborly Service	Food Public Svc	291	5287	1391	257	34	97	30	8	50	5	39	170	5977			
			88.5%	23.3%	4.3%	0.6%	1.6%	0.5%	0.1%	0.8%	0.1%	0.7%	2.8%	Sub-recipient percentages			
			93.97%	11.91%	0.41%	0.97%	0.60%	0.14%	0.52%	0.74%	0.50%	0.16%	0.16%	3.06%	AMERICAN FACT FINDER % (CO2003, B03002)		
			68936	8738	298	713	439	106	385	545	368	115	115	2242	AMERICAN FACT FINDER (5-year data)		
Volunteers of America	Housing Rehab	292	131	4	0	0	0	0	0	0	0	0	0	0	131		
			100.0%	3.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	Sub-recipient percentages		
			93.97%	11.91%	0.41%	0.97%	0.60%	0.14%	0.52%	0.74%	0.50%	0.16%	0.16%	3.06%	AMERICAN FACT FINDER % (CO2003, B03002)		
			68936	8738	74.4%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	
Alternatives to Violence	Public Facility Rehab	294	30	11	7	0	0	0	0	0	0	0	0	4	41		
			73.2%	26.8%	17.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	Sub-recipient percentages		
			93.97%	11.91%	0.41%	0.97%	0.60%	0.14%	0.52%	0.74%	0.50%	0.16%	0.16%	3.06%	AMERICAN FACT FINDER % (CO2003, B03002)		
			68936	8738	298	713	439	106	385	545	368	115	115	2242	AMERICAN FACT FINDER (5-year data)		
Alternatives to Violence	Housing Public Svc	297	136	45	9	1	2	0	0	0	0	0	0	16	173		
			78.6%	26.0%	5.2%	0.6%	1.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	Sub-recipient percentages		
			93.97%	11.91%	0.41%	0.97%	0.60%	0.14%	0.52%	0.74%	0.50%	0.16%	0.16%	3.06%	AMERICAN FACT FINDER % (CO2003, B03002)		
			74125	16.3%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	-202.6%	AMERICAN FACT FINDER (5-year data)	
Alternatives to Violence	Homeward Alliance/MurCtr	298	171	38	11	5	15	0	0	0	0	0	0	14	216		
			79.2%	17.6%	5.1%	2.3%	6.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	Sub-recipient percentages		
			93.97%	11.91%	0.41%	0.97%	0.60%	0.14%	0.52%	0.74%	0.50%	0.16%	0.16%	3.06%	AMERICAN FACT FINDER % (CO2003, B03002)		
			68936	8738	298	713	439	106	385	545	368	115	115	2242	AMERICAN FACT FINDER (5-year data)		
Loveland Housing Authority	Housing Public Svc	299	11	1	1	0	0	0	0	0	0	0	0	0	12		
			91.7%	8.3%	8.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	Sub-recipient percentages		
			93.97%	11.91%	0.41%	0.97%	0.60%	0.14%	0.52%	0.74%	0.50%	0.16%	0.16%	3.06%	AMERICAN FACT FINDER % (CO2003, B03002)		
			74125	15.8%	30.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	AMERICAN FACT FINDER (5-year data)
Neighbor to Neighbor		None	564	166	13	9	7	2	1	2	3	2	35	638			
			88.4%	26.0%	2.0%	1.4%	1.1%	0.3%	0.2%	0.3%	0.5%	0.3%	0.3%	5.5%	Sub-recipient percentages		
			93.97%	11.91%	0.41%	0.97%	0.60%	0.14%	0.52%	0.74%	0.50%	0.16%	0.16%	3.06%	AMERICAN FACT FINDER % (CO2003, B03002)		
			68936	8738	298	713	439	106	385	545	368	115	115	2242	AMERICAN FACT FINDER (5-year data)		
			74125														

CATEGORIES	1: White	2: Black/African American	3: Asian	4: American Indian/Alaskan Native	5: Native Hawaiian/Other Pacific Islander	6: American Indian/Native Alaskan & White	7: Asian & White	8: Black/African American & White	9: Amer. Indian/Alaskan Native & Black/African Amer.	10: Other Multi-racial
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Leveraging 2018-2019

Agency	Program	IDIS	CDBG	Other	Total	Notes
Alternatives to Violence	Housing Public Svc	289	\$ 2,402	\$ 295,598	\$ 298,000	
Murphy Center/Homeless Gear	Homelessness Public Svc	290	\$ 17,735	\$ 406,549	\$ 424,284	
House of Neighborly Service	Food Public Svc	291	\$ 27,291	\$ 633,396	\$ 660,687	
Volunteers of America	Housing Rehab	292	\$ 25,000	\$ -	\$ 25,000	
Alternatives to Violence	Public Facility Rehab	294	\$ 20,985	\$ 1,973	\$ 22,958	
Loveland Housing Authority	Home Rehab	295	\$ 85,532	\$ 257,000	\$ 342,532	\$70,200 EN, \$13,332.27 Pl. Other amt is estimate.
Alternatives to Violence	Housing Public Svc	297	\$ 24,765	\$ 449,418	\$ 474,183	
Homeward Alliance/MurCtr	Homelessness Public Svc	298	\$ 27,423	\$ 395,997	\$ 423,420	
Loveland Housing Authority	Housing Public Svc	299	\$ 3,266	\$ 112,841	\$ 116,107	
Volunteers of America	Housing Rehab	300	\$ 28,453	\$ 7,204	\$ 35,657	Other amount is an estimate.
Loveland Housing Authority	New Housing	301	\$ 285,885	\$ 17,881,006	\$ 18,166,891	Other amount is an estimate.
<b>Project is still open.</b>			\$ 548,737	\$ 20,440,982	\$ 20,989,719	

# Outline of Civil Rights Related Program Requirements for Grantees from HUD's CPD Programs

Region VIII Denver  
Office of Fair Housing and Equal Opportunity  
Program Compliance Branch

**City of Loveland actions are below in red.**

## 1. Title VI of the Civil Rights Act of 1964 (Title VI) and 24 C.F.R. Part 1

Title VI prohibits discrimination on the bases of race, color, or national origin in all federally assisted programs.

- Benefits, Services, and Methods of Administration (24 C.F.R. § 1.4)

Title VI regulations at 24 C.F.R. § 1.4 require Grantee to **analyze jurisdictional demographic** data for race, color, and national origin to determine whether any of the jurisdiction's minority groups appear under-represented in its HUD-funded programs. If an analysis of the demographic data evidences under-representation by any group based on race, color, or national origin, Grantee must adjust the administration of its programs and activities to assure equitable participation.

- ✓ The City of Loveland Community Partnership Office (CPO) submits jurisdictional demographic data compared to funded agency data annually with the CAPER. For PY 2018-2019, agency data indicates a greater percentage of people served for all self-reported racial categories except American Indian/Alaskan Native, American Indian/Native Alaskan & White and Black/African American & White. For American Indian/Native Alaskan, the difference is eight people.
- ✓ The Community Partnership Office will start addressing this by reviewing agency intake forms to determine if all racial categories are listed to better understand if people are checking a multi-racial box.
- ✓ Working with CDBG funded agencies, the CPO will assist with affirmative marketing to reach those residents who are not accessing funded services, including monitoring all data combined and for each individual agency.

- Citizen Participation (24 C.F.R. § 1.4 and §§ 570.506 and 91.105)

Title VI requires Grantee to implement **affirmative efforts to involve racial and ethnic minorities** in its citizen participation process.

- ✓ The City of Loveland contracts for written, verbal and in-person translation or interpretation. The CPO has translated surveys, legal ads and part of reports submitted to HUD, and has used interpreters for public meetings.
- ✓ The CPO is working on an updated Citizen Participation Plan that will be submitted with the next Consolidated Plan (2020 – 2024). Historically, the CPO has advertised public participation opportunities in English and Spanish. Intentional outreach to predominantly Spanish speaking organizations includes translation by a certified translator.
- ✓ The Executive Summary and Goals section of the 2015-2019 Consolidated Plan, as well as community surveys, were translated into Spanish.

- ✓ All public meeting agendas have information about receiving interpretation services written in Spanish.

- **Limited English Proficiency (LEP)** (24 C.F.R. Part 1.4(b) and Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons)

Title VI regulations at 24 C.F.R. Part 1.4(b) prohibit Grantee from administering its programs or activities in such a way as to limit access based on race, color, and national origin. Title VI, relevant regulations, and the final guidance regarding LEP persons protect access to such programs by LEP persons on the basis of national origin. As a result, Grantee is required to **develop procedures to assure equal access to LEP persons**. HUD specifically expects Grantees to provide oral interpreters and to provide written translation of vital documents when the LEP population exceeds 1,000 persons. Vital documents include public notices. To comply with LEP requirements, Grantee must conduct a four-factor analysis, create a Language Access Plan (LAP), and document actions to implement the LAP. For more information about the LEP requirements and the final LEP guidance, visit HUD's LEP page: [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/promotingfh/lep-faq](https://www.hud.gov/program_offices/fair_housing_equal_opp/promotingfh/lep-faq).

- ✓ In 2019, the CPO worked with funded agencies to ensure each has a Title VI (and ADA) policy by completing public meetings and offering technical assistance. For non-Federally funded programs, the CPO has a Title VI requirement, but is calling it a non-discrimination policy. Please see the attached checklist that is used to evaluate these policies.
- ✓ In 2020, the City of Loveland will work with funded agencies to ensure that each has a completed Limited English Proficiency plan. Agencies will also receive implementation training that they will be expected to complete with their employees and report those trainings to the CPO. The CPO will follow-up with each agency at least annually.
- ✓ A (draft) Title VI plan for the City of Loveland has been completed and has been reviewed by the City Attorney. The plan will be reviewed by the City Manager before making it available to the public. Employee training will follow in 2020.
- ✓ The CPO will ask funded non-profits for a list of vital documents and those that have not yet been translated to ensure that agencies complete this work.
- ✓ The CPO has distributed "I Speak" cards to all local non-profits and will continue to make laminated cards available in case they are misplaced by the agency. About 75 cards have been distributed.
- ✓ The CPO will monitor funded agency websites for the availability of Spanish translation.

- Title VI Recordkeeping (24 C.F.R §§ 1.6(b) and 121)

Title VI implementing regulations at 24 C.F.R. § 1.6(b) require recipients of federal financial assistance to gather and maintain such information as the Department shall deem necessary with respect to the racial and ethnic characteristics of applicants and participants in their federally funded programs and activities. To comply with the **Title VI recordkeeping** regulations, Grantee must consistently collect complete and accurate records that reflect the race and ethnicity of direct program beneficiaries. The collection of this data must conform to

form HUD-27061, “Race and Ethnic Data Reporting Form”<sup>1</sup> found here: <https://www.hud.gov/sites/documents/27061-H.PDF>. Upon request, Grantee should be able to produce the source documents<sup>2</sup> utilized to comply with the Title VI recordkeeping regulations.

- ✓ Race/ethnicity data is received quarterly and entered into IDIS. Because the Office of Fair Housing does not receive race/ethnicity data via IDIS, the CPO transfers all data into an excel spreadsheet and emails the information to the City of Loveland Fair Housing representative.

2. Section 109 of Title I of the Housing and Community Development Act of 1974 (Section 109) and 24 C.F.R. Part 6

Section 109 prohibits discrimination on the bases of race, color, national origin, religion, and sex in any program or activity funded in whole or in part with federal financial assistance (e.g., CDBG and HOME, etc.)

- Benefits, Services, and Methods of Administration (24 C.F.R. § 6.4)

Section 109 implementing regulations at 24 C.F.R. § 6.4 require Grantee to analyze jurisdictional demographic data for race, color, national origin, religion, and sex to determine whether any of the jurisdiction’s minority groups appear under-represented in its HUD-funded programs. If an analysis of the demographic data evidences under-representation by any group based on race, color, national origin, sex, or religion, Grantee must adjust the administration of its programs and activities to assure equitable participation.

- Citizen Participation (24 C.F.R. § 6.6 and §§ 570.506 and 91.105)

Section 109 requires Grantee to implement affirmative efforts to involve racial and ethnic minorities and female-headed households in its citizen participation process.

- Section 109 Recordkeeping (24 C.F.R. §§ 6.6(a), 6.10(c), and 121)

Section 109 implementing regulations at 24 C.F.R. §§ 6.6(a) and 6.10(c) require recipients of federal financial assistance to gather and maintain such information as the Department shall deem necessary with respect to the race, ethnicity, and sex of applicants and participants in their federally funded programs and activities. The collection of race and ethnic data must conform to form HUD-27061, “Race and Ethnic Data Reporting Form” found here: <https://www.hud.gov/sites/documents/27061-H.PDF> (See footnote #2.) Upon request, Grantee should be able to produce the source documents<sup>3</sup> utilized to comply with the Section 109 recordkeeping regulations.

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<sup>1</sup> In August 2002, the Department also issued “OMB Standards for Federal Data on Race and Ethnicity: HUD Policy Statement and Implementing Guidelines.” This document specifies the manner for gathering, maintaining, and submitting racial and ethnic characteristics to HUD.

<sup>2</sup> Title VI recordkeeping source documents are the actual reporting forms (e.g., applications, contracts, etc.) utilized by Grantee or Grantee’s subrecipients to collect the race and ethnic characteristics of those applying for or benefitting from the expenditure of HUD funds. These documents are the *source* Grantee used to enter race and ethnicity information into IDIS for the production of cumulative reports that show aggregate demographic data.

<sup>3</sup> Section 109 recordkeeping source documents are the actual reporting forms (e.g., applications, contracts, etc.) utilized by Grantee or Grantee’s subrecipients to collect the race, ethnicity, and sex of those applying for or benefitting from the

- ✓ Same information as #1 above.
- ✓ The CPO does not collect information about religion or sex because IDIS does not ask for this information, but will seek assistance from our Fair Housing representative to find out if we should start.

3. Section 504 of the Rehabilitation Act of 1973 (Section 504) and 24 C.F.R. Part 8/Title II of the Americans with Disabilities Act of 1990 (ADA) and 28 C.F.R. Part 35

- ✓ The City of Loveland has completed the self-evaluation part of our updated Transition Plan and will begin prioritizing non-compliant areas for implementation over the next 12 month. For 2020, we will be focusing on City of Loveland facilities and undertaking corrective actions. We have also evaluated our website and are in the process of ensuring accessibility of content. A citywide ADA survey was completed with employees and will be followed by several employee-training events next year.

Section 504 prohibits discrimination based on disability under any federally assisted program or activity.

- ✓ Benefits, Services, and Methods of Administration (24 C.F.R. § 8.4(b))

24 C.F.R. § 8.4(b) requires Grantee to **analyze jurisdictional demographic data** to determine whether people with disabilities appear under-represented in Grantee's HUD-funded programs. If an analysis of the demographic data evidences under-representation by people with disabilities, Grantee must adjust the administration of its programs and activities to assure equitable participation.

- ✓ The CPO submits jurisdictional demographic data compared to funded agency data annually with the CAPER. For PY 2018-2019, agency data indicates a greater percentage of persons with disabilities (22.1%) than the City of Loveland (12%), which is not surprising given that people living on disability income require additional assistance to make ends meet each month.

[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/disabilities/sect504faq](https://www.hud.gov/program_offices/fair_housing_equal_opp/disabilities/sect504faq)

- ✓ Citizen Participation (24 C.F.R. § 8.4 and §§ 570.506 and 91.105)

Section 504 requires Grantee to implement affirmative efforts to involve and ensure **equal access to people with disabilities** in its citizen participation process.

- ✓ All public meetings are held in an accessible location.
- ✓ Agendas include information about accessing assistance if needed.
- ✓ Auxiliary aids are available for all public meetings.

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expenditure of HUD funds. These documents are the *source* Grantee used to enter race, ethnicity, and sex information into IDIS for the production of cumulative reports that show aggregate demographic data.

- ✓ Section 504 Non-Discrimination Notice (24 C.F.R. § 8.54(b))

Section 504 requires Grantee to provide a Section 504 non-discrimination notice within printed informational materials Grantee makes available to participants, beneficiaries, applicants, and employees.

- ✓ The City of Loveland includes notices of non-discrimination on public meeting notices and in public locations.



**Notice of Non-Discrimination**

It is the policy of the City of Loveland to provide equal services, programs and activities without regard to race, color, national origin, creed, religion, sex, sexual orientation, disability, or age and without regard to the exercise of rights guaranteed by state or federal law. It is the policy of the City of Loveland to provide language access services at no charge to populations of persons with limited English proficiency (LEP) and persons with a disability who are served by the City.

For more information on non-discrimination or for translation assistance, please contact the City's Title VI Coordinator at [TitleSix@cityofloveland.org](mailto:TitleSix@cityofloveland.org) or 970-962-2372. The City will make reasonable accommodations for citizens in accordance with the Americans with Disabilities Act (ADA). For more information on ADA or accommodations, please contact the City's ADA Coordinator at [ADACoordinator@cityofloveland.org](mailto:ADACoordinator@cityofloveland.org) or 970-962-3319.

**Notificación en contra de la discriminación**

La política de la Ciudad de Loveland es proveer servicios, programas y actividades iguales sin importar la raza, color, origen nacional, credo, religión, sexo, orientación sexual, discapacidad, o edad y sin importar el uso de los derechos garantizados por la ley estatal o federal. La política de la Ciudad de Loveland es proveer servicios gratis de acceso de lenguaje a la población de personas con dominio limitado del inglés (LEP, por sus iniciales en inglés) y a las personas con discapacidades quienes reciben servicios de la ciudad.

Si desea recibir más información en contra de la discriminación o si desea ayuda de traducción, por favor comuníquese con el Coordinador del Título VI de la Ciudad en [TitleSix@cityofloveland.org](mailto:TitleSix@cityofloveland.org) o al 970-962-2372. La Ciudad hará acomodaciones razonables para los ciudadanos de acuerdo con la Ley de Americanos con Discapacidades (ADA, por sus iniciales en inglés). Si desea más información acerca de la ADA o acerca de las acomodaciones, por favor comuníquese con el Coordinador de ADA de la Ciudad en [ADACoordinator@cityofloveland.org](mailto:ADACoordinator@cityofloveland.org) o al 970-962-3319.

Title VI and ADA Grievance Policy and Procedures can be located on the City of Loveland website at: [cityofloveland.org/](http://cityofloveland.org/)

Updated 08-29-15

- ✓ Effective Communication (24 C.F.R. § 8.6)

Section 504 requires Grantee to take appropriate steps to **ensure effective communication** with applicants, beneficiaries, and members of the public by: (1) Furnishing appropriate **auxiliary aids** when necessary to afford individuals with disabilities equal opportunity to participate in and enjoy the benefits of a program or activity receiving federal financial assistance; (2) Providing **telecommunication devices for the deaf** (TDDs) or equally effective communication systems for hearing impaired persons; and (3) Adopting and implementing procedures to ensure that interested persons (including **persons with impaired vision or hearing**) **can obtain information** concerning the existence and location of accessible services, activities, and facilities

- ✓ The City of Loveland has auxiliary aids and will hire sign-language assistance to accommodate people with hearing impairments; both have been used in public meetings.

- ✓ A TDD device is available at the City of Loveland and is advertised with public outreach.
- ✓ The City is updating its website and a vendor has been selected. As part of that update, the City and the Vendor are taking into consideration recommendations provided by our Consultants on our recent ADA Self-Evaluation process of our website pages to continue to ensure equal and accessible access to information about programs and services.
- ✓ The CPO will monitor agencies for website accessibility.
- ✓ A Boulder based nonprofit, Audio Information Network, provided radio ads for sight-impaired residents to increase citizen participation during the Consolidated Plan process. Ads were spoken in both English and Spanish.

- Section 504 Recordkeeping (24 C.F.R. §§ 8.55(b) and 121)

Section 504 requires Grantee to maintain complete and accurate records that show the extent to which **persons with disabilities participate** in its federally funded programs and activities. Section 504 implementing regulations at 24 C.F.R. § 8.55(b) specifically require recipients of federal financial assistance to gather, maintain, and submit documentation of the extent to which persons with disabilities are participants in federally funded programs and activities. Upon request, Grantee should be able to produce the source documents<sup>4</sup> utilized to comply with the Section 504 recordkeeping regulations.

- ✓ See #3 above.

4. Affirmatively Furthering Fair Housing (AFFH) Certification: Title VIII of the Fair Housing Act of 1968, as amended (the Fair Housing Act), Section 808(e)(5), and 24 C.F.R. § 91.225, Local Jurisdictions; 91.323, States; and 91.425, Consortia

The AFFH Certification requires Grantee to:

- Conduct an **analysis to identify impediments to fair housing choice** within the jurisdiction;
- Take appropriate actions to overcome the effects of impediments identified through the analysis; and
- **Maintain records** reflecting the analysis and actions taken in this regard.

- ✓ The City of Loveland completed a partial Assessment of Fair Housing that was submitted in May 2018. The prior Analysis of Impediments to Fair Housing Choice expired in 2017, and the City of Loveland was unsure about the future of the AFH process. The submitted document reviewed all AFH questions with the goal of understanding the information that was readily available, including maps, information that would be sought primarily through citizen participation when the City was responsible for completing a full AFH (then scheduled for January 2020), and the process the City would take to complete the full document. The interim AFH was reviewed by the City of Loveland Fair Housing representative at that time. Actions that the City had taken or was planning to take to further fair housing became the interim Action Plan.

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<sup>4</sup> Section 504 recordkeeping source documents are the actual reporting forms (e.g., applications, contracts, etc.) utilized by Grantee or Grantee's subrecipients to collect the disability status of those applying for or benefitting from the expenditure of HUD funds.

- ✓ A sticker has been placed on Fair Housing posters to give customers additional information about filing a complaint or discussing housing with a local person. Information on the stickers is in both English and Spanish.

## 5. Section 3 of the HUD Act of 1968 and 24 C.F.R. Part 135

Section 3 requires grantees to **provide job training, employment, and contract opportunities** to low- or very-low income residents in connection with projects and activities in their neighborhoods to the greatest extent feasible.

- Notifying Section 3 Residents and Business Concerns (24 C.F.R. § 135.32(a))

Grantee must implement procedures to notify Section 3 residents about training and employment opportunities generated by Section 3 covered assistance and Section 3 business concerns about contracting opportunities generated by Section 3 covered assistance “to the greatest extent feasible.”

- Notifying Potential Contractors about Section 3 and Incorporating the Section 3 Clause (24 C.F.R. § 135.32(b))

Grantee must notify potential contractors for Section 3 covered project of the Section 3 requirements to the greatest extent feasible.

- Facilitating Training and Employment of Section 3 Residents and the Award of Contracts to Section 3 Business Concerns (24 C.F.R. § 135.32(c))

Grantee must offer training and employment opportunities to Section 3 residents and awarding contracts to Section 3 business concerns to the greatest extent feasible to reach the numerical goals in 24 C.F.R. § 135.30.

- Obtaining the Compliance of Contractors and Subcontractors with Section 3 (24 C.F.R. § 135.32(d))

Grantee must make “greatest extent feasible” efforts to ensure contractors’ and subcontractors’ compliance with Section 3.

- Documenting Actions Taken to Comply with Section 3 Requirements (24 C.F.R. § 135.90)

Grantee must complete and submit Section 3 reports, HUD form 60002, to HUD annually.

- ✓ The CPO requires a document to be completed by all contractors to find out if hiring will be necessary at any point during a contract. If the contractor claims that no new hires will be needed, follow-up occurs on-site while completing Davis Bacon paperwork. If the contract indicates that new employees will be needed, a checklist will be completed to assist with hiring Section 3 employees. To date, no contractors have hired new employees for any City of Loveland projects. The likely reason is the amount of funding the City of Loveland receives results in funding short-term

- projects. Should hiring occur, all of the above requirements will be documented and submitted with our annual HUD form 60002.
- ✓ The City of Loveland is up-to-date with Section 3 reporting via SPEARS.

For more information about the Section 3 requirements, visit HUD's Section 3 webpage at: [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/section3/section3](https://www.hud.gov/program_offices/fair_housing_equal_opp/section3/section3).

## 6. Section 504 Accessibility Requirements (24 C.F.R. §§ 8.22, 8.23, 8.32)

Grantee must operate its federally assisted programs and activities such that they are readily accessible to and usable by individuals with disabilities when viewed in their entirety. Grantee must **ensure that none of its federally assisted programs or activities denies people with disabilities benefits, exclude people with disabilities from participation in, or otherwise subject people with disabilities to discrimination because the federally assisted facilities are inaccessible or unusable** by people with disabilities.

Pursuant to 24 C.F.R. §§ 8.22 and 8.32:

- ✓ Grantee must ensure that all of its federally assisted new construction projects **built after July 10, 1988** are physically accessible in accordance with the Uniform Federal Accessibility Standards (UFAS).<sup>5</sup>
- ✓ The City of Loveland primarily funds the Loveland Housing Authority for new (multi-family) housing. The CPO will research the number and type of units for persons with disabilities in each multi-family project, including how many are currently occupied by persons with disabilities to ensure that accessible units are housing the appropriate people.
- ✓ For all new construction federally assisted housing built after July 10, 1988, Grantee must ensure that **a minimum of 5% (but at least one unit) of the total number of dwelling units in multifamily complexes (5+ units) is accessible for mobility impaired persons in accordance with UFAS**. Additionally, Grantee must ensure that **at least 2% of the total number of dwelling units in new construction multifamily complexes is accessible for persons with visual or hearing impairments**. **If Grantee funds substantial alterations costing 75% or more of the replacement cost of the completed facility,<sup>6</sup> these new construction provisions apply.**

<sup>5</sup> See <http://www.access-board.gov/ufas/ufas-html/ufas.htm>.

<sup>6</sup> Also see 24 C.F.R. 8.23(b): "... Alterations to dwelling units in a multifamily housing project (including public housing) shall, to the maximum extent feasible, be made to be readily accessible to and usable by individuals with handicaps. If alterations of single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, the entire dwelling unit shall be made accessible. Once five percent of the dwelling units in a project are readily accessible to and usable by individuals with mobility impairments, then no additional elements of dwelling units, or entire dwelling units, are required to be accessible under this paragraph. Alterations to common areas or parts of facilities that affect accessibility of existing housing facilities shall, to the maximum extent feasible, be made to be accessible to and usable by individuals with handicaps. For purposes of this paragraph, the phrase to the maximum extent feasible shall not be interpreted as requiring that a recipient (including a PHA) make a dwelling unit, common area, facility or element thereof accessible if doing so would impose undue financial and administrative burdens on the operation of the multifamily housing project... HUD may prescribe a higher percentage or number than that prescribed in paragraph (b)(1) of this section for any area upon request therefor by any affected recipient or by any State or local government or agency thereof based upon demonstration to the reasonable satisfaction of HUD of a need for a higher percentage or number, based on census data or other available current data (including a currently effective Housing Assistance Plan or Comprehensive Homeless Assistance Plan), or in response to evidence of a need for a higher percentage or number received in any other manner. In reviewing such request or otherwise

- ✓ The CPO will also research this information.
- ✓ The Section 504 coordinator for the Loveland Housing Authority is Andy Bickers. He can be reached at [abickers@lovelandhousing.org](mailto:abickers@lovelandhousing.org) or (970) 635-5942.

- ✓ For federally assisted housing in developments constructed prior to July 11, 1988, Grantee must ensure that the housing complies with the Section 504 accessibility requirements using UFAS as the design and construction standard to the maximum extent practicable.

## 7. Fair Housing Act Design and Construction Requirements (24 C.F.R. § 100.205)

Grantee must ensure that all of its privately or federally assisted multifamily housing in buildings with four or more dwelling units built for **first occupancy after March 13, 1991** complies with the Fair Housing Accessibility Guidelines.<sup>7</sup> In summary, all multifamily housing built for first occupancy after March 13, 1991 must comply with the following seven basic requirements to ensure compliance:

- (1) An accessible building entrance on an accessible route;
- (2) Accessible and usable common and public use areas;
- (3) Usable doors;
- (4) An accessible route into and through dwelling units;
- (5) Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations;
- (6) Reinforced walls in bathrooms for later installation of grab bars; and
- (7) Usable kitchens and bathrooms.<sup>8</sup>

Grantee may comply with these guidelines by using one of the ten safe harbors, which includes the Fair Housing Act Design Manual.<sup>9</sup>

- ✓ The CPO will also research this information.

## 8. Section 504 Coordinator (24 C.F.R. § 8.53(a))

Grantees with 15 or more employees must designate at least one person to coordinate its efforts to comply with Section 504.

- ✓ The City of Loveland has a Section 504 Coordinator. Jason Smitherman can be reached at [jason.smitherman@cityofloveland.org](mailto:jason.smitherman@cityofloveland.org) or (970) 962-3319.

## 9. Section 504 Non-Discrimination Notice (24 C.F.R. § 8.54(a))

Grantees with 15 or more employees must ensure they are taking appropriate initial and continuing steps to **notify participants, beneficiaries, applicants, and employees**, including those with

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assessing the existence of such needs, HUD shall take into account the expected needs of eligible persons with and without handicaps.”

<sup>7</sup> See [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/disabilities/fhefhaq](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/fhefhaq).

<sup>8</sup> For more information, also see [www.fairhousingfirst.org](http://www.fairhousingfirst.org).

<sup>9</sup> See <http://www.huduser.org/portal/publications/destech/fairhousing.html>.

impaired vision or hearing, **that they do not discriminate on the basis of disability**. The notification must include the name and contact information for the designated Section 504 coordinator.

- ✓ The CPO will ensure that the Loveland Housing Authority is taking these actions.
- ✓ Agency ADA policies collected by the CPO all say that the agency does not discriminate based on disability.

#### 10. Section 504 Grievance Procedure (24 C.F.R. § 8.53(b))

Grantees with 15 or more employees must adopt grievance procedures that incorporate appropriate due process standards and that provide for the prompt and equitable resolution of complaints alleging any action prohibited by Section 504.

- ✓ The City of Loveland has a grievance policy and process on our website.
- ✓ All funded agencies have a grievance policy that has been reviewed by the CPO prior to contracting for grant funding in 2019. The CPO will ensure that agencies have this information easily available on their website and have a sign in their office so customers understand that policy and that they may file a grievance.

Grantee is additionally subject to the following HUD rule ultimately enforceable by CPD:

#### 11. Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity (Equal Access Rule)

**HUD's Equal Access Rule, effective March 5, 2012**, is a HUD program requirement that ensures **equal access to housing in HUD programs, regardless of sexual orientation, gender identity, or marital status**. The Equal Access Rule contains three components that apply to recipients of Housing and Community Development funds (e.g., CDBG, HOME, NSP, CDBG-DR, ESG, HOPWA, etc.), Section 8, and public housing assistance under the United States Housing Act of 1937: 1.) **General equal access provision**: Housing assisted by HUD or insured by FHA must be made available without regard to actual or perceived sexual orientation, gender identity, or marital status (24 C.F.R. 5.105 (a)(2)). 2.) **Definition of family: Must include persons regardless of actual or perceived sexual orientation, gender identity, or marital status** (24 C.F.R. 5.403). 3.) **Inquiries: Prohibits inquiries of an applicant's or occupant's sexual orientation or gender identity** for the purpose of determining eligibility or otherwise making housing available (24 C.F.R. 5.105). HUD's 2016 rule, CPD-15-02, "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs,"<sup>10</sup> (CPD Rule) **applies to recipients, subrecipients, owners, operators, and managers of shelters and other buildings and facilities and providers of services funded in whole or in part by any CPD program**. The CPD Rule explicitly establishes that housing providers may inquire about an individual's gender identity to determine the most appropriate placement for someone seeking housing in shelters and facilities with physical limitations or configurations that require shared sleeping quarters or shared bathing facilities. The Rule additionally establishes that a CPD financed housing provider's policies and procedures must ensure that individuals are not subjected to intrusive questioning or asked to provide anatomical information or documentary, physical, or medical evidence of an individual's gender identity.

<sup>10</sup> <https://www.federalregister.gov/documents/2016/09/21/2016-22589/equal-access-in-accordance-with-an-individuals-gender-identity-in-community-planning-and-development>

## **History of actions taken by the City of Loveland during the 2015-2019 Consolidated Plan**

- ✓ To receive a financial incentive to build affordable housing, a builder completes an application that includes questions about proximity to food and transportation. This question was added to the application process in 2015 to work toward housing placement that works for the future occupants and not just the builder.
- ✓ The City of Loveland zoning code was rewritten in 2018 to allow more housing options, including simplifying the development application process, minimizing the cost to applicants by allowing discretionary approvals prior to requiring construction drawings, and reducing the minimum lot size and housing footprint. The code was adopted and in use as of January 1, 2019. Additional work is now underway to better understand the costs of smaller homes and how to make them work.
- ✓ The Human Services Commission funds a non-profit that provides rental assistance in addition to case management around foreclosure prevention and mortgage counseling. Neighbor to Neighbor reaches a diverse clientele with the exception of Asian, Asian & White, Black/African American & White, American Indian/Alaskan Native & Black/African American, and Multi-racial. As noted with marketing to all residents on page 1, the CPO will first review the intake form of Neighbor to Neighbor and see if there are additional places the agency should advertise for services.
- ✓ Public transportation was restructured in 2018 with a shift from one-way routes to best practices in transit that included the needs of seniors, youth and low-income residents. Changes to the fixed route services increased ridership by 12.7%. Changes were made with input from riders, although the number of comments received was not available. City of Loveland Transit (COLT) now offers travel training and day outings for seniors. They also worked with the CPO to gather cold weather clothes and gear that was distributed to people at or near homelessness.
- ✓ Loveland' City Council continue to participate in annual proclamations for Fair Housing month and Martin Luther King Jr day. A Fair Housing month advertisement is also placed in the City of Loveland utility bill in April and mailed to about 39,000 residents. The ad provides information about who to call with a complaint or talk about housing issues. The CPO received a few calls in 2019, but none of them were Fair Housing related.
- ✓ 3,900 single ride passes were given to area non-profits from City of Loveland COLT for low-income residents to travel to other agencies, medical appointments, jobs or any other needs. The value of the passes is \$4,875. **ADDITIONAL QUESTIONS FOR CANDICE. (p12 & 17, 35)**
- ✓ The City of Loveland support various non-profits that provide housing support for low-income and minority residents through grant funds and other incentives, including Habitat for Humanity for home ownership **opportunities, Project Self-Sufficiency with case management and support for 60 families, of which 20 live in low-income housing provided by the Loveland Housing Authority; N2N, OCOF etc.**
- ✓ The CPO ensures that all funded agencies have visible Fair Housing posters during on-site monitoring visits. Unfortunately, new posters seem to be unavailable and the CPO does not have a good way to print downloadable posters.
- ✓ The City of Loveland helped an agency that provides day center services and inclement weather shelter to homeless adults increase accessibility to their public facility with new sidewalks that ensure that someone with a mobility impairment can reach the agency.
- ✓ Public Works completed 4.5 of 8 major sidewalk gaps in 2018 and 2019, 3.5 of which are in areas with an increase in Hispanic families with Limited English Proficiency. The

remaining gaps will be completed in 2020 with more proposed. Completing these gaps, allow people to walk and bike. Without some of the sidewalks, people had to walk in the street or in the mud if the weather was bad.

- ✓ The City of Loveland Parks & Recreation Department uses GIS to evaluate the distance people across the city have to travel for recreation opportunities. Master Plan research has resulted in the purchase of 60 acres in north/west Loveland for a community park that will be less than  $\frac{3}{4}$  of a mile from a subdivision that includes 20% of the homes sold to families living at or below 70% of the area median income. Land was also purchased for a neighborhood park in south/east Loveland east of the Boys & Girls Club in an area with a significant increase in minority populations and across the street from the Brookstone complex owned by the Loveland Housing Authority.
- ✓ Loveland City Council approved funding for a sober living facility that will include access via Medicaid, potentially ending the homelessness of residents ready to seek sobriety.

#### **Actions expected to be taken by the City of Loveland during the next two years**

- ✓ Public education about homelessness to hopefully reduce NIMBY issues around housing residents with the greatest barriers to housing. A (draft) Homeless Strategic Plan was completed in 2019 that includes public outreach and education around this issue.
- ✓ The Community Partnership Office started to disseminate a Fair Housing survey when we thought we were still going to complete a full AFH in 2020. We will review that survey for questions that should be included in public outreach for our 2020-2024 Consolidated Plan.
- ✓ Northern Colorado (Larimer and Weld County) will form the Northern Colorado Continuum of Care in 2020, leaving the Balance of State. This transition is an opportunity to discuss all aspects of providing housing, such as live/work or homeless preferences.
- ✓ Increase diversity of City of Loveland Boards & Commissions by advertising in non-mainstream locations.
- ✓ The CPO will work with funded agencies to ensure that staff that provide translation services are certified.
- ✓