

Consolidated Annual Performance Evaluation Report

2019-2020



Community Partnership Office

500 E. Third St, Suite 210; Loveland, CO 80537

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 fifth and final year of the 2015-2019 Consolidated Plan, the City of Loveland expected to complete the final 20% of the 5-year goals. By the end of the program year, the goals of new single-family housing, rehabilitation of single-family homes, public services and rehabilitation of public facilities have been met in full. The rehabilitation of multi-family housing will be met when all current projects are completed but not before the submission of this final report. The goals of new multi-family housing and housing for homeless residents were not met over the five years of the Consolidated Plan, although progress was made that significantly improved the lives of many Loveland residents. Specific accomplishments by type of project to date include the following:

NEW HOUSING. The Loveland Housing Authority completed 120 new multi-family units for people living between 30% and 60% of the area median income and 10 units for homeless veterans. An additional 69 units are currently under construction and will be completed in June 2021. The 189 units are 63% of the goal of 300 new units and the 10 homes for homeless veterans are 33% of the goal of 30. The goal of 75 new units of single-family housing was completed in 2019, although none of the homes were funded with CDBG so they have not been entered into IDIS and will appear only in this part of the narrative.

PUBLIC FACILITIES. Three organizations received funding for seven public facility projects over the five years of the Consolidated Plan. This goal was met after the second year.

PUBLIC SERVICES. Close to 13,000 people received services from the agencies that received public service funding, far exceeding the goal of 5,000.

HOUSING REHABILITATION. 940 people are expected to receive housing rehabilitation assistance once 2019 projects have been completed. Currently, 729 have been entered into IDIS: 588 single-family occupants with a five year goal of 600, and 141 multi-family occupants with a five year goal of 200. When current projects have been completed, the result is expected to be 745 for single-family homes and 195 for multi family homes, exceeding the five year goal by 140 units.

The Affordable Housing and Human Services Commissions used the accomplishment data of the five year Consolidated Plan to understand

reoccurring funding requests and expected projects over the next five years for more accurate goal setting in 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: \$200000	Rental units constructed	Household Housing Unit	300	120	40.00%	69	60	86.96%
Create new affordable housing	Affordable Housing Public Housing Homeless	CDBG: \$200000	Homeowner Housing Added	Household Housing Unit	75	0	0.00%	0	0	
Create new affordable housing	Affordable Housing Public Housing Homeless	CDBG: \$200000	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	

Create new affordable housing	Affordable Housing Public Housing Homeless	CDBG: \$200000	Housing for Homeless added	Household Housing Unit	30	10	33.33%	0	0	
Create new affordable housing	Affordable Housing Public Housing Homeless	CDBG: \$200000	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
New or rehabilitated public facilities	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$21610	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2	406	20,300.00%	0	19	
New or rehabilitated public facilities	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$21610	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				

New or rehabilitated public facilities	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$21610	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		156	0	0.00%
New or rehabilitated public facilities	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$21610	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
New or rehabilitated public facilities	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$21610	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	

Public service activities	Homeless Non-Homeless Special Needs	CDBG: \$70290	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	13229	264.58%	0	4288	
Public service activities	Homeless Non-Homeless Special Needs	CDBG: \$70290	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		5612	0	0.00%
Public service activities	Homeless Non-Homeless Special Needs	CDBG: \$70290	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
Public service activities	Homeless Non-Homeless Special Needs	CDBG: \$70290	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
Rehabilitate affordable housing	Affordable Housing Public Housing	CDBG: \$114715	Rental units rehabilitated	Household Housing Unit	200	143	71.50%	0	25	
Rehabilitate affordable housing	Affordable Housing Public Housing	CDBG: \$114715	Homeowner Housing Rehabilitated	Household Housing Unit	600	600	100.00%	189	123	65.08%
Rehabilitate affordable housing	Affordable Housing Public Housing	CDBG: \$114715	Housing for Homeless added	Household Housing Unit	0	0		0	0	

Rehabilitate affordable housing	Affordable Housing Public Housing	CDBG: \$114715	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
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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 program year to describe the data in Table 1 is as follow:

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 homeless residents. Data in the table matches information described above. Once all projects have been completed and including the 75 single-family homes using another funding source, this goal was met by 68%. Overall, about 47% of brick/mortar funding was spent on new housing.

PUBLIC FACILITY REHABILITATION. The lowest priority for CDBG funding is to invest in public facilities with a goal of two projects. Note that the expected number of people to be served was lowered in Table 1 from 183 that was entered into the Annual Action Plan, to 157 for the two 2019 public facility projects when the Activities were entered. The Easterseals project that expected to serve 138 people was significantly reduced to 25 because of COVID-19. That project has not yet been closed because the Community Partnership Office is still reviewing Davis Bacon paperwork. The 19 households were entered from the Alternatives to Violence project. About 8% of brick/mortar funding was spent on public facilities.

The number of people actually served in Table 2 shows up as 49 in the ConPlan/2019 AAP report. It should be 44 for the 2019 program year and 406 for all five program years combined. The number has been updated to show that 406 people benefited from funding in public facilities.

PUBLIC SERVICE ACTIVITIES. The third priority is to provide a public service. This goal was met a few years ago although the number of people expected to be served during the program year was 24% lower. The City of Loveland always allocates 15% of CDBG to public services. More recently, the Human Services Commission started designating the public services funding to a program that works to end someone’s

homelessness.

HOUSING REHABILITATION. The second priority is rehabilitating housing to ensure residents are able to remain in their homes. As stated, this goal will be met when all funded projects are completed. About 45% of all brick/mortar funding was spent on housing rehabilitation projects. The numbers in the table above have been updated to reflect the PR03, which matches the quarterly reports on file in the Community Partnership Office. The difference is additional reports that were entered into IDIS after the CAPER was started.

Priorities identified during the 2015 Consolidated Plan will continue over the 2020-2024 Consolidated Plan.

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	4,145
Black or African American	135
Asian	19
American Indian or American Native	53
Native Hawaiian or Other Pacific Islander	16
Total	4,368
Hispanic	1,231
Not Hispanic	3,374

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

Narrative

The attached (Fair Housing Data) report has the most complete data on race and ethnicity and includes multi-year project information for activities prior to 2019 that remained open at the beginning of the current program year. The race table does not include all categories, leaving 237 people uncounted. The total should be 4,605 as reflected in the Hispanic/Not Hispanic boxes. Overall, City of Loveland sub-recipients served fewer White, Asian, American Indian/Native Alaskan & White, and Asian & White clients.

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	484,463	479,003

Table 3 - Resources Made Available

Narrative

The City of Loveland received a 2019-2020 CDBG award of \$389,247 and accessed \$95,215 in program income (out of \$119,019) that had been returned to the City. \$18,344 of the program income was spent during the 2018 PY and \$5,460 will be spent during the 2020 PY.

As further described below under CR-25, the City of Loveland will donate four acres of land to address the need of housing homeless residents. If the 9% Low Income Housing Tax Credit application is successful, housing will be available in the spring of 2023.

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 Report shows that City of Loveland CDBG leveraged more than \$43 million in other funding for Loveland projects. Listed are those projects that were funded and/or closed during the 2019-2020 program years and includes two new multi-family housing complexes that make up more than \$40 million of the \$43 million.

A description of how publically owned land will address one of the goals of the Consolidated Plan can be found under CR-25.

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	118	89
Number of Special-Needs households to be provided affordable housing units	140	119
Total	258	208

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	69	60
Number of households supported through Rehab of Existing Units	189	148
Number of households supported through Acquisition of Existing Units	0	0
Total	258	208

Table 6 – Number of Households Supported

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

The 2019 Annual Action Plan listed 69 people served under One-Year Goal Non-Homeless households to be provided affordable housing units and 140 under Special-Needs households to be provided affordable housing units. The origin of the one-year goal numbers shown above is not clear. However, the City of Loveland completed 60 units of new multi-family housing during the program year and rehabilitated 148. These numbers include only PY2019 results and can be found on PR-03.

There are three notable gaps in expected goals and actual outcomes in CR-05. The first is single-family housing rehabilitation (IDIS 295 & 300). In both instances, the agency overpredicted the need and CDBG funding was not spent in one program year. To mitigate this issue, less money will be allocated to these

programs. The second is a multi-family rehabilitation project that was funded with PY2019 CDBG that hasn't been started (IDIS 313). This project will be completed in the next six to eight months. The third is the time it takes to build multi-family units funded with CDBG. The Edge II apartments received \$200,000 of PY2019 funding and will be completed in June, which is too late to add that information into this CAPER.

Discuss how these outcomes will impact future annual action plans.

The accomplishments of the 2015-2019 Consolidatd Plan and Annual Action Plans were used to create the goals of the 2020-2024 Consolidated Plan. The Community Partnership Office has a greater understanding of the types of proposals likely to be received, as well as the capacity of local agencies to complete the goals of new housing, including housing for homeless residents, housing rehabilitation and the future need of assistance with a public facility. The predicted outcomes over the next five years are believed to be much 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	75	0
Low-income	85	0
Moderate-income	48	0
Total	208	0

Table 7 – Number of Households Served

Narrative Information

The City of Loveland does not work directly to address the needs of persons with disabilities or low-income renters who pay more than half of their income for rent and/or live in substandard housing. Instead, grant funding is distributed to local non-profit organizations that do this work, although the grant process is competitive and agencies that provide these services may or may not get funded each year. Applicants generally include Disabled Resource Services to work with persons with disabilities (public service), Neighbor to Neighbor to provide rent assistance (public service) and Loveland Housing Authority and Volunteers of America to rehabilitate substandard housing (brick/mortar).

Through our Human Service and Community Development Block Grant processes, the City of Loveland takes actions to foster and maintain affordable housing in the area of rent assistance or any other assistance that can be used to free up a family's money so more can be used to pay for rent.

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

The City of Loveland does not have a street outreach program, which makes it difficult to reach out to unsheltered persons. Service providers such as House of Neighborly Service/137 Connection and Family Promise programs, Disabled Resource Services, Community Kitchen, One Community One Family, SummitStone Health Partners and Salvation Army have regular contact with unsheltered residents, although rarely outside of a public facility, some of which have been at least partially closed since the middle of March for social distancing.

Northern Colorado still has a robust Coordinated Entry system in spite of the pandemic and has housed many people this year. Over the last 4.75 years, Northern Colorado service providers have assessed 1,817 people under our Coordinated Entry system and have housed 982 (54%), about 165 people have left the area and 670 are waiting for housing. Of the 670 people who are waiting, almost 80% are single adults. The Continuum of Care hopes to house about 90 single adults in the next six months.

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 but the individual adult program no longer provides inclement weather shelter. Community Partnership Office staff is working on a new shelter program that will hopefully be running by January

Loveland currently has seven units of transitional housing. The number has not increased for many years.

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 keep people housed through home rehabilitation. The City of Loveland also funds agencies that provide rental assistance (Neighbor to Neighbor, St. Vincent de Paul) 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 Disabled Resource Services, 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 from a publically funded institution, but does work with agencies that do, including the Salvation Army that will put an individual or family in a motel after discharge from the hospital, and Homeward Alliance and Volunteers of America to find housing and other assistance for people exiting jail or prison. Northern Colorado does not currently have housing for people right after they leave an institutional setting.

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

Coordinated Entry results are described above. The Northern Colorado Continuum of Care is expecting to announce a date by which we will reach Functional Zero for veteran homelessness, which by definition includes a shortened time period that veterans experience homelessness. Currently, the number of homeless families and homeless youth are smaller than the number of homeless veterans. However, those systems do not currently have the same level of housing resources.

The City of Loveland completed a great deal of research around homeless services and responses in Loveland and extending out to all of Northern Colorado. Next, Homeward Alliance, a service provider in Fort Collins, will complete a service gaps analysis for Loveland to better understand needs and priorities with an eye to filling gaps.

Archdiocese Housing, with partners BlueLine Development and Shop Works Architecture, will submit a Low Income Housing Tax Credit application to the Colorado Housing and Finance Authority in February 2021. If the application is successful, Loveland will offer 54 units of supportive housing around April 2023.

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. In 2019, the Loveland Housing Authority received a waiver of close to \$1.2 million in building and development fees for 69 units of multi-family housing as well as \$200,000 in CDBG. In 2018, 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.

Over the last two years, City Council waived \$360,598 for 13 new single-family homes for Loveland Habitat for Humanity. 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 started a non-profit service organization about three years ago. Aspire 3D, through a partnership with Loveland Housing Authority, works with residents to provide site based, resident driven solutions to both individual and community needs or concerns. The organization launched a Leadership Council in four Housing Authority communities: Orchard Place, The Edge, Silver Leaf and Mirasol. Residents meet monthly to identify community strengths and challenges, develop and implement solutions and build social connections. This approach to resident engagement ensures that programs and activities better meet the needs of unique communities and are more sustainable, long term solutions. In addition to the resident lead group work, Navigators provide client centered work with each resident to identify their goals, barriers and steps to achieve self-sufficiency to break the cycle of generational poverty and ultimately transition out of low-income housing to home ownership. 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. Additional work is underway to ensure the changes work. I

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

The Community Partnership Office cancelled the annual Loveland Homeless Connect event due to COVID-19. In 2019, the event served 241 homeless and near homeless residents with 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 agencies.

At the beginning of the pandemic, staff from the Community Partnership Office shared the CDC guidelines that suggested that homeless camps be allowed to remain where they were. Additional porta-lets and dumpsters for camp cleaning were provided. Staff worked with homeless individuals to access stimulus funding until the middle of July and asked that people work on keeping their camps clean to avoid contamination until the restriction was lifted in the spring. Another moratorium on removing camps is in place until March 31, 2021.

Communtiy Partnership Office staff continue 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.

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. The City does not have a funded program for reducing lead-paint hazards in general.

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

The City of Loveland allocates \$460,000 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. The City of Loveland is not a direct service provider but funds organizations that work to lift families out of poverty.

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 will continue to host a monthly meeting to have agency representatives share their program information with other agencies once COVID-19 restrictions have been lifted. Agency representatives provide information such as 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.

The Community Partnership Office has been working with several private housing developers to try to increase the number and type of affordable housing in the City. A project that will produce about 60 new single family attached homes will start by the end of this year.

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.

In 2019, the City of Loveland completed a Fair Housing Loveland Actions document that was submitted with this final report. Although the Community Partnership Office did not receive comments from the Office of Fair Housing, the document has been updated and is attached 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 but was delayed in 2020 due to additional COVID grant funding to distribute, HUD monitoring and completing the 2020-2024 Consolidated Plan. During the 2019 PY, the Community Partnership Office monitored three out of five projects (IDIS 291, 292 & 297). The CPO will monitor the remaining two (IDIS 298 & 299) as well as recently closed projects starting in mid-January. The office will also develop a shorter monitoring form to use for re-occurring projects and will only complete a full monitoring every three years.

For all CDBG funded projects, the Community Partnership Office has been working with subrecipients on general Title VI, ADA and grievance policies and procedures and will now work with agencies on Limited English Proficiency and Effective Communication policies with the help of a national expert. A meeting with local non-profits will be mandatory for agencies that receive Community Development Block Grant funding from the City of Loveland and will be highly encouraged for agencies that receive other Federal funding. This meeting was originally scheduled for April 2020, but will be postponed until 2021.

Minority business outreach information is gathered 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.

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.

Attachments

Executive Summary

City of Loveland

Executive Summary – 2019/2020 CAPER

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- **NEW HOUSING.** The Loveland Housing Authority completed 120 new multi-family units for people living between 30% and 60% of the area median income and 10 units for homeless veterans. An additional 69 units are currently under construction and will be completed in June 2021. The 189 units are 63% of the goal of 300 new units and the 10 homes for homeless veterans are 33% of the goal of 30. The goal of 75 new units of single-family housing was completed in 2019, although none of the homes were funded with CDBG so they have not been entered into IDIS and will appear only in this part of the narrative.
- **PUBLIC FACILITIES.** Three organizations received funding for seven public facility projects over the five years of the Consolidated Plan. This goal was met after the second year.
- **PUBLIC SERVICES.** Close to 13,000 people received services from the agencies that received public service funding, far exceeding the goal of 5,000.
- **HOUSING REHABILITATION.** 940 people are expected to receive housing rehabilitation assistance once 2019 projects have been completed. Currently, 729 have been entered into IDIS: 588 single-family occupants with a five year goal of 600, and 141 multi-family occupants with a five year goal of 200. When current projects have been completed, the result is expected to be 745 for single-family homes and 195 for multi family homes, exceeding the five year goal by 140 units.

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Resumen Ejecutivo

Durante el quinto y último año del Plan Consolidado 2015-2019, la Ciudad de Loveland esperaba completar el 20% final de las metas de 5 años. Al final del año del programa, se han cumplido plenamente los objetivos de nuevas viviendas unifamiliares, rehabilitación de viviendas unifamiliares, servicios públicos y rehabilitación de instalaciones públicas. La rehabilitación de viviendas multifamiliares se cumplirá cuando se completen todos los proyectos actuales, pero no antes de la presentación de este informe final. Los objetivos de nuevas viviendas multifamiliares y viviendas para residentes sin hogar no se cumplieron durante los cinco años del Plan Consolidado, aunque se lograron

avances que mejoraron significativamente las vidas de muchos residentes de Loveland. Los logros específicos por tipo de proyecto hasta la fecha incluyen lo siguiente:

- **VIVIENDAS NUEVAS.** La Autoridad de Vivienda de Loveland completó 120 nuevas unidades multifamiliares para personas que viven entre el 30% y el 60% del ingreso medio del área y 10 unidades para veteranos sin hogar. 69 unidades adicionales están actualmente en construcción y se completarán en junio de 2021. Las 189 unidades representan el 63% de la meta de 300 nuevas unidades y las 10 casas para veteranos sin hogar son el 33% de la meta de 30. La meta de 75 nuevas unidades de vivienda unifamiliar se completó en 2019, aunque ninguna de las viviendas fue financiada con CDBG, por lo que no se han ingresado en IDIS y aparecerán solo en esta parte de la narrativa.
- **INSTALACIONES PÚBLICAS.** Tres organizaciones recibieron financiamiento para siete proyectos de instalaciones públicas durante los cinco años del Plan Consolidado. Esta meta se cumplió después del segundo año.
- **SERVICIOS PÚBLICOS.** Cerca de 13,000 personas recibieron servicios de las agencias que recibieron fondos de servicio público, superando con creces la meta de 5,000.
- **REHABILITACIÓN DE VIVIENDA.** Se espera que 940 personas reciban asistencia para la rehabilitación de viviendas una vez que se hayan completado los proyectos de 2019. Actualmente, se han ingresado 729 en el IDIS: 588 ocupantes unifamiliares con un objetivo de cinco años de 600 y 141 ocupantes multifamiliares con un objetivo de cinco años de 200. Cuando se hayan completado los proyectos actuales, se espera que el resultado sea 745 para viviendas unifamiliares y 195 para viviendas multifamiliares, superando la meta de cinco años en 140 unidades.

Las Comisiones de Servicios Humanos y Vivienda Asequible utilizaron los datos de logros del Plan Consolidado de cinco años para entender las solicitudes de financiación recurrentes y los proyectos previstos para los próximos cinco años, a fin de establecer metas más precisas en el Plan Consolidado de 2020-2024.

Fair Housing Data

FHEO CAPER Supplemental - 2019-2020

Agency	Program	IDIS	Fem. HH	Disabled	Homeless	Seniors	Total Clients	Notes
Loveland Housing Authority	Home Rehab	295	22	21	0	27	31	
Volunteers of America	Housing Rehab	300	*	124	0	140	157	
Loveland Housing Authority	New Housing	301	39	12	3	60	60	
Homeward Alliance	Public Service	303	*	119	245	25	263	
Alternatives to Violence	Public Service	304	149	62	78	49	769	
House of Neighborly Service	Public Service	305	986	539	199	752	3150	
One Community One Family	Public Service	306	29	20	101	3	106	
Easterseals	Public Facility	307	0	25	0	0	25	
Alternatives to Violence	Public Facility	308	2	7	19	1	19	
Neighbor to Neighbor	Housing Rehab	309	6	0	3	12	11	
Volunteers of America	Housing Rehab	310	*	10	0	11	14	
Loveland Housing Authority	New Housing	311						Housing has not yet been built, expected June 2021. Will be 69 units.
Loveland Housing Authority	Housing Rehab	312						Project has not yet started. Expected to start in 2021.
Loveland Housing Authority	Housing Rehab	313						Project has not yet started. Expected to start in 2021.
* No children in the home so this isn't tracked.			1233	939	648	1080	4605	
** Did not collect this data during grant year.			26.8%	20.4%	14.1%	23.5%		Percentage of total people served
** Disproportionate percentage homeless because homeless programs are funded.			6.6%	19.7%	***	26.3%		Loveland data
Project is still open.			AmFF	AmFF	AmFF			Source
2019-2020 Projects			51101	51810	50101: age 60			Report #
			2019-1yr	2019-1yr	2019-1yr			Year

CAPER Supplemental - 2019-2020

Agency	Program	IDIS	1	Hispanic	2	3	4	5	6	7	8	9	10	Total Clients	Notes
Loveland Housing Authority	Home Rehab	295	30	1		1								31	
Volunteers of America	Housing Rehab	300	157	8										157	
Loveland Housing Authority	New Housing	301	60	2										60	
Homeward Alliance	Public Service	303	227	48	13		12						11	263	
Alternatives to Violence	Public Service	304	730	215	16	2	2						19	769	
House of Neighborly Service	Public Service	305	2782	920	97	14	39	16	3	14	18	24	143	3150	
One Community One Family	Public Service	306	98	31	8									106	
Easterseals	Public Facility	307	20	3		1							4	25	
Alternatives to Violence	Public Facility	308	16	3	1	1							1	19	
Neighbor to Neighbor	Housing Rehab	309	11											11	
Volunteers of America	Housing Rehab	310	14											14	
Loveland Housing Authority	New Housing	311												0	Project hasn't started
Loveland Housing Authority	Housing Rehab	312												0	Project hasn't started
Loveland Housing Authority	Housing Rehab	313												0	Project hasn't started
TOTALS for FY 2019-2020 funded projects only for QCR-10			3898	1220	135	18	53	16	3	14	18	24	178	4605	TOTALS
CATEGORIES			4145	1231	135	19	53	16	3	14	18	24	178	4605	TOTALS
1: White			90.0%	26.7%	2.9%	0.4%	1.2%	0.3%	0.1%	0.3%	0.4%	0.5%	3.9%		Sub-recipient percentages
2: Black/African American			75395	70517	8578	344	691	487	106	569	505	317	158	1701	CENSUS (C02003, B03002)
3: Asian							56.2%			91.6%	55.8%				Agencies served fewer than Loveland average.
4: American Indian/Alaskan Native															by more than 10%
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															

Leveraging 2019-2020

Agency	Program	IDIS	CDBG	Other	Total	Notes
Loveland Housing Authority	Home Rehab	295	\$ 85,532	\$ 257,000	\$ 342,532	\$70,200 EN, \$13,332.27 Pl. Other amt is estimate
Volunteers of America	Housing Rehab	300	\$ 28,453	\$ 22,559	\$ 51,012	
Loveland Housing Authority	New Housing	301	\$ 285,885	\$ 18,313,509	\$ 18,599,394	
Homeward Alliance	Public Service	303	\$ 22,017	\$ 361,674	\$ 383,691	
Alternatives to Violence	Public Service	304	\$ 17,285	\$ 83,816	\$ 101,101	
House of Neighborly Service	Public Service	305	\$ 19,773	\$ 532,124	\$ 551,897	
One Community One Family	Public Service	306	\$ 11,215	\$ 94,632	\$ 105,847	
Easterseals	Public Facility	307	\$ 4,010	\$ -	\$ 4,010	
Alternatives to Violence	Public Facility	308	\$ 17,600	\$ 17,355	\$ 34,955	
Neighbor to Neighbor	Housing Rehab	309	\$ 17,320	\$ 11,180	\$ 28,500	
Volunteers of America	Housing Rehab	310	\$ 22,000	\$ 14,242	\$ 36,242	
Loveland Housing Authority	New Housing	311	\$ 200,000	\$ 21,948,044	\$ 22,148,044	
Loveland Housing Authority	Housing Rehab	312	\$ 40,000	\$ 293,068	\$ 333,068	
Loveland Housing Authority	Housing Rehab	313	\$ 35,395	\$ 134,605	\$ 170,000	

Project is still open. Leveraging amount is an estimate until closed. \$ 806,485 \$ 42,083,808 \$ 42,890,293

Fair Housing Supplemental Report

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 2019-2020, agency data indicates a greater percentage of people served for all self-reported racial categories except White, Asian, American Indian/Native Alaskan & White, and Asian & White. For Black/African American & White, the difference is fewer than two people.
- ✓ The Community Partnership Office was not able to address the number of people served in all racial categories in 2020 with additional work due to COVID-19, but will start in 2021 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 and/or interpretation. The CPO has translated surveys, legal ads and part of reports submitted to HUD, and has used interpreters for public meetings.
- ✓ The 2020-2024 Consolidated Plan was completed in 2020, and included community outreach in English and Spanish. The Executive Summary and Goals section of the Plan were also translated into Spanish.
- ✓ A new Citizen Participation Plan was also completed in 2020, and included community outreach in English and Spanish.

- ✓ Historically, the CPO has advertised public participation opportunities in English and Spanish. Intentional outreach to predominantly Spanish speaking individuals and organizations includes translation by a certified translator.
- ✓ 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.

- ✓ 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 below that is used to evaluate policies.
- ✓ In 2020, the City of Loveland scheduled a work session with funded agencies to ensure that each has a completed Limited English Proficiency plan, but cancelled the meeting in April and will work to reschedule (preferable in person) in 2021. Agencies will also receive implementation training that they will be expected to complete with their employees and report those trainings to the CPO.
- ✓ A (draft) Title VI plan for the City of Loveland was 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 did not occur in 2020 but likely will in 2021.
- ✓ The CPO will ask funded non-profits for a list of vital documents after the scheduled training in 2021. The CPO will ensure that agencies complete the translation 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 an agency.
- ✓ The CPO will monitor funded agency websites for the availability of Spanish translation after the scheduled training in 2021.

- 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

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race and ethnicity of direct program beneficiaries. The collection of this data must conform to form HUD-27061, "Race and Ethnic Data Reporting Form"¹ found here: <https://www.hud.gov/sites/documents/27061-H.PDF>. Upon request, Grantee should be able to produce the source documents² 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 attaches the information to the CAPER and emails the information to the City of Loveland Fair Housing representative as well.

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 documents³ utilized to comply with the Section 109 recordkeeping regulations.

¹ 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.

² 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 benefiting 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.

³ Section 109 recordkeeping source documents are the actual reporting forms (e.g., applications, contracts, etc.) utilized by

- ✓ 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 the City of Loveland 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 completed the self-evaluation part of our updated Transition Plan and prioritized non-compliant areas for implementation. Projects completed in 2020 include: renovation of the restrooms at the Water & Power Administration Building; design of modernization of the elevators at the Loveland Municipal Building and the Chilson Recreation Center; initiation of preventive maintenance program to address door and gate compliance at all facilities; initiation of program to modify grab bars, toilet paper dispensers and paper towel dispensers in restrooms throughout all facilities; and renovation of the service counter at the Municipal City Clerk's Office.
- ✓ A citywide ADA survey was completed with employees in 2019 and will be followed by new employee regulations and training.

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 2019-2020, agency data indicates a greater percentage of persons with disabilities (20.4%) than the City of Loveland (19.7%), which is not surprising given that people living on disability income require additional assistance to make ends meet each month and one of the subrecipients was Easterseals.

https://www.hud.gov/program_offices/fair_housing_equal_opportunity/disabilities/sect504faq

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

Grantee or Grantee's subrecipients to collect the race, ethnicity, and sex of those applying for or benefitting from the 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.

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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 assistance if needed.
- ✓ Auxiliary aids are available for all public meetings.

✓ 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.



✓ 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 interpreters 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 CPO will monitor agencies for website accessibility as stated above.
- ✓ A Boulder based nonprofit, Audio Information Network, can provide radio ads in English and Spanish for sight-impaired residents to increase citizen participation.

- 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 documents⁴ 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 report 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

⁴ 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.

that the City had taken or was planning to take to further fair housing became the interim Action Plan.

- ✓ 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 in the hope that a local phone number will increase the likelihood of a resident reporting discrimination. 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 hired, 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 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.

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).⁵

✓ The City of Loveland funds the Loveland Housing Authority for new (multi-family) housing. The CPO is still researching 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,⁶ these new construction provisions apply.

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

⁶ 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

- ✓ The CPO is researching the percentage of units for mobility and visual/hearing impaired residents in each complex built after July 10, 1988.
- ✓ The Section 504 coordinator for the Loveland Housing Authority is Andy Bickers. He can be reached at 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.⁷ 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.⁸

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

- ✓ The CPO expected to gather this information in 2020 but was unable given additional work required to address COVID-19. This will be completed in 2021.

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 Section 504 Coordinator for the City of Loveland is Jason Smitherman. He can be reached at jason.smitherman@cityofloveland.org or (970) 962-3319.

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

⁷ See http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/fhefhag.

⁸ For more information, also see www.fairhousingfirst.org.

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

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 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 is researching whether or not 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 was reviewed by the CPO prior to contracting for grant funding in 2019. The CPO will ensure that agencies have grievance information easily available on their website and have a sign in their office so customers understand the policy and procedure.

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,"¹⁰ (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

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

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.

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 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 will be completed in 2021 to understand the costs of building fees for smaller homes.
- ✓ 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 and free rides for youth. They also worked with the CPO to gather cold weather clothes and gear that was distributed to people at or near homelessness at the Loveland Connect event in 2019.
- ✓ In 2020, public transportation continued to operate on a normal schedule throughout the pandemic providing necessary transportation to essential services. Following CDC and local guidance, cleaning increased, barriers were installed between the operators and passengers at the fare box, capacity was reduced to 50% and masks were required. Minor route adjustments were made to increase efficiency and on-time performance and two new buses were purchased to replace vehicles in an aging fleet.
- ✓ 1,720 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 \$2,150. The number of passes was down significantly from 2019 when 3,900 passes were distributed.
- ✓ Loveland's City Council member continue to participate in an annual proclamation for Martin Luther King Jr day.
- ✓ The City of Loveland did not proclaim April as Fair Housing month for the first time in many years because of the pandemic. The CPO will resume an April Fair Housing Month Proclamation in 2021, including a Fair Housing month advertisement placed in the City of Loveland utility bill that is mailed to about 39,000 residents. The ad provides information

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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.

- ✓ The CPO ensures that all funded agencies have visible Fair Housing posters during on-site monitoring visits. The CPO was able to get more posters from the Denver Metro Fair Housing Center in December.
- ✓ 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 prioritized sidewalk gaps in 2018 and 2019, 3.5 of which were in areas with an increase in Hispanic families with Limited English Proficiency; and two gaps in 2020. Prioritization included distance from a school, bus stop, downtown Loveland, park or other recreation or community service; missing, poor or fair sidewalk condition; constructability criteria such as right of way, utility lines and grading; and safety concerns or other priorities. Gaps filled in 2020 included a section on Madison Avenue to increase access to bus service; and Carlisle Drive for student safety that supports walking and biking to three schools. A new transportation master plan, Connect Loveland, will be adopted in 2021. The plan identifies pedestrian priority areas that will become the target for the annual sidewalk gap program.
- ✓ 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 ¼ 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.
- ✓ Northern Colorado (Larimer and Weld County) formed the Northern Colorado Continuum of Care in 2020, leaving the Balance of State. The NoCo CoC also received \$2.2 million in ESG-CV funding to help

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

- ✓ Continuing public education about homelessness to try to 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. A Lead Agency may be selected in 2021.
- ✓ The Loveland City Council unanimously voted to provide four acres of land on which to build Supportive Housing. Archdiocesan Housing will submit a 9% Low Income Housing Tax Credit Application to the Colorado Housing and Finance Authority in February 2021.
- ✓ The CPO will work to increase diversity of City of Loveland Boards & Commissions by providing non-mainstream locations for the City Clerk's Office to advertise.
- ✓ The CPO will work with funded agencies to ensure that staff that provide translation services are certified.
- ✓ The CPO will request technical assistance from the Office of Fair Housing.

The CPO spent a good portion of 2020 updating the Citizen Participation Plan, completing the Consolidated Plan, distributing grant funding primarily to keep people from losing their housing due to a

loss of employment and addressing homelessness, including a lack of shelter in Loveland. Many projects, including those around Fair Housing, were not completed as expected in 2020.

Exhibit C



Organization Name: _____

Date Submitted: _____

An Agency's Non-Discrimination Policy must include (at a minimum) the following:

Reviewer Initials	Policy /Practice Requirements	Notes
	State that the agency prohibits discrimination on the basis of race, color or national origin for all programs.	Provide meaningful access to your programs.
	State that the agency does not distinguish among individuals in the quantity, quality or timeliness of program services, aids or benefits that they provide or the manner in which they provide them.	
	Include a language assistance plan for non-English speaking, which is a Limited English Proficiency Plan that outlines interpretation practices and staff training.	Trained, certified interpreters. Translated vital documents (applications). Translated website. Only use family if it is an emergency.
	Include a grievance process (may link to an agency's Grievance Policy/Processes).	
	Document and maintain staff training, competency and manual regarding policies and procedures.	
	Policy must be posted in areas directly accessible to clients/ customers in English and Spanish.	

Americans with Disabilities

An Agency's ADA Policy and Practices must include (at a minimum) the following:

Reviewer Initials	Policy/Practice Requirements	Notes
	State that the agency prohibits discrimination on the basis of disability status for all programs.	
	State that the agency will make reasonable accommodations for citizens in accordance with the Americans with Disabilities Act.	
	State that the agency will make reasonable modifications	

	to policies and programs to ensure that people with disabilities have equal opportunity to participate in programs, services and activities.	
	<p>Include an effective communication section that focuses on providing appropriate aids and services leading to effective communication for qualified persons with disabilities to participate in programs and services:</p> <ul style="list-style-type: none"> • include options for hearing and sight impaired individuals • include options for mobility impaired individuals • include options for intake forms and other vital documents • include options for Web site information 	
	Document and maintain staff training, competency and manual regarding policies and procedures for effective communications.	
	Include a grievance process (may link to an agency's Grievance Policy/Processes).	
	Policy must be posted in areas directly accessible to clients/ customers in English and Spanish.	

Grievance Policy for ADA/Non-Discrimination

An agency's Grievance Policy and Practices must include (at a minimum) the following:

Reviewer Initials	Policy/Practice Requirements	Notes
	Grievance should be in writing. If complainant needs assistance, it must be made available.	
	Provide grievance form that asks questions about incident. Including question about witnesses.	
	Include whether efforts were made to resolve the grievance through an internal grievance procedure.	
	Include in writing timeframes, procedures and roles of responsibility for when and how each stage or level will be responded to/addressed.	
	Grievances and their resolutions should be recorded and kept on file for a defined timeframe and be accessible to funding partners and licensing entities.	