

Consolidated Annual Performance Evaluation Report

2020-2021



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 first year of the 2020-2024 Consolidated Plan, the City of Loveland expected to complete 20% of the 5-year goals. By the end of the program year, none of the 2020-2021 projects were on track to meet any of the goals, although projects completed during the year furthered the goals of new multi-family housing and rehabilitation of single and multi-family housing in the 2015-2019 Consolidated Plan. Information and accomplishments by type of project include the following:

NEW HOUSING. No new housing projects were funded during the 2020-2021 program year. However, the Loveland Housing Authority completed and leased 69 units of multi-family housing for people living between 30% and 60% of the area median income, a project that was funded in 2019 and increased the new housing goal in the 2015-2019 Consolidated Plan.

PUBLIC FACILITIES. One organization received funding for a public facility project, but that project has been delayed. When the project is finished, the goal will be 33% complete in terms of the number of public facility projects expected over the five years of this Consolidated Plan, and potentially 50% of the number of people served in public facilities funded with CDBG.

PUBLIC SERVICES. 478 people received services from the agencies that received public service funding, which is just under 10% of the five-year goal. 57 people are listed under homeless beds below. That number is included in the 478 as well.

HOUSING REHABILITATION. No housing rehabilitation projects were funded during the 2020-2021 program year, although 54 households received housing rehabilitation assistance from projects that were funded in 2017 and 2019, increasing that goal in the 2015-2019 Consolidated Plan.

The Affordable Housing and Human Services Commissions used the accomplishment data of the 2015-2019 Consolidated Plan to determine outcomes for the current plan. Changes made by non-profit organizations after the plan was submitted, specifically goals under housing rehabilitation, are now at risk of not being met over the next five years.

The City of Loveland CDBG-CV grants helped 241 families with utility assistance, 30 families with rent assistance, 14 people searching for a new

job, 78 people using services from two day centers for persons with disabilities stay safe with on-going sanitizing, 26 people with non-congregant shelter to recover from COVID in a motel, and 62 people living in public housing access job assistance and other COVID related needs.

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 Homeless		Rental units constructed	Household Housing Unit	225	0	0.00%			
Create New Affordable Housing	Affordable Housing Homeless		Homeowner Housing Added	Household Housing Unit	25	0	0.00%			
Create New Affordable Housing	Affordable Housing Homeless		Housing for Homeless added	Household Housing Unit	50	0	0.00%			
New or Rehabilitated Public Facility	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$42500	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	300	0	0.00%	19	0	0.00%

Public Service Activities	Homeless Non-Homeless Special Needs	CDBG: \$57361	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	478	9.56%	575	478	83.13%
Public Service Activities	Homeless Non-Homeless Special Needs	CDBG: \$57361	Homeless Person Overnight Shelter	Persons Assisted	0	57		0	57	
Public Service Activities	Homeless Non-Homeless Special Needs	CDBG: \$57361	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
Rehabilitate Affordable Housing	Affordable Housing	CDBG: \$211522	Rental units rehabilitated	Household Housing Unit	200	0	0.00%	72	0	0.00%
Rehabilitate Affordable Housing	Affordable Housing	CDBG: \$211522	Homeowner Housing Rehabilitated	Household Housing Unit	700	0	0.00%			

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.

The highest priority for City of Loveland CDBG funding is building new affordable single- or multi-family housing, or new housing for homeless residents. No proposals addressing this need were received in 2020. One project was funded in 2021 and will be reported in 2023 when the project has been completed and all tenants have been leased.

The second priority is funding the rehabilitation of single- or multi-family housing. One multi-family project was funded in 2020 but the rehabilitation is substantial and the project was not completed by the end of the program year. Data for this project will be reported next year.

The last priority for brick/mortar funding is new public facilities or public facility rehabilitation. One project was funded in both 2020 and 2021

and will be reported next year.

Public service activities are funded every year. The City of Loveland always allocates 15% of CDBG to public services.

Priorities identified during the 2015 Consolidated Plan have been continued in the 2020-2024 Consolidated Plan with an update to the potential number served.

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	896
Black or African American	68
Asian	8
American Indian or American Native	31
Native Hawaiian or Other Pacific Islander	5
Total	1,008
Hispanic	188
Not Hispanic	969

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 that includes activities prior to 2020 that remained open at the beginning of the current program year. The race table above does not include all categories, leaving 69 people uncounted. The total should be 1,077 as reflected in the Hispanic/Not Hispanic boxes. Overall, City of Loveland sub-recipients served a lower percentage of Black/African American, American Indian/Native Alaskan & White, Asian & White, Black/African American & White, and American Indian/Alaskan Native & Black/African American residents.

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	387,805	

Table 3 - Resources Made Available

Narrative

The City of Loveland received a 2020-2021 CDBG award of \$382,345 and had \$5,460 in program income that was not allocated in PY 2019.

In 2020, four acres of land owned by the City of Loveland was granted to Archdiocesan Housing to build Supportive Housing in Loveland. A 9% Low Income Housing Tax Credit award was received by Archdiocesan Housing in 2021. Ground breaking will occur in April 2022.

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 \$36 million in other funding for Loveland projects. Listed are those projects that were funded and/or closed during the 2020-2021 program years and includes one new and one rehabbed multi-family housing complex that make up 96% of the leveraged funds, primarily with low income housing tax credits.

There were no matching requirements.

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	72	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	72	0

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	0	0
Number of households supported through Rehab of Existing Units	72	0
Number of households supported through Acquisition of Existing Units	0	0
Total	72	0

Table 6 – Number of Households Supported

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

The Loveland Housing Authority received funding to provide significant rehabilitation to 72 units of multi-family housing affordable to families living at 40% and 50% of the area median income. Rehabilitation will take a full year and the project was not finished by the end of the 2020 program year. This goal will be reported in 2022.

Volunteers of America has historically applied for and received an annual CDBG award. In 2020-2021, the agency requested and received a Human Service Grant from the City of Loveland. This change will dramatically reduce the number of homes rehabilitated each year and will likely result in an inability to meet that goal over the 5 years of the Consolidated Plan.

Discuss how these outcomes will impact future annual action plans.

After the first year results from the 2020-2024 Consolidated Plan, the City of Loveland believes that it will be difficult to meet the goal of rehabilitated housing units.

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	0	0
Low-income	0	0
Moderate-income	0	0
Total	0	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 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 currently has a faith-based street outreach team called The Servant's Heart. Homeward Alliance, recently hired by the City of Loveland to work on filling service gaps, applied for an Emergency Solutions Grant for mental health/substance use based street outreach. In addition, Homeward Alliance has a team of Dedicated Navigators who will meet with unsheltered persons outside of their (rotating) office. Reaching unsheltered persons in Loveland is starting to become more consistent. Better results are expected in 2022.

Service providers such as House of Neighborly Service/137 Connection and Family Promise programs, Disabled Resource Services, Community Kitchen, SummitStone Health Partners and Salvation Army have regular contact with unsheltered residents, although rarely outside of a public facility, some of which are still partially closed because of the pandemic.

Northern Colorado still has a robust Coordinated Entry system in spite of the pandemic and has housed many people this year. Since 2016, Northern Colorado service providers have housed 597 veterans (92%), 432 non-veteran adults (45%), 384 families (84%), and 21 youth (49%). The goal to reach Function Zero with veterans is expected to occur in 2022.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Loveland Community Partnership Office is providing winter shelter for adults from November 9, 2021 through March 31, 2022, or longer if an extreme weather event occurs. The city does not have emergency shelter for families, although the Family Promise program of the House of Neighborly Service shelters up to four families that are participating in their program.

Loveland currently has five units of transitional housing. The number has not increased for many years. Four other units that used to be transitional housing are now dedicated supportive housing units for youth.

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 local non-profits through a competitive process and does not set aside funding for specific outcomes, such as organizations working with residents who are likely to become homeless after having been discharged from an institution or system of care. During the 2020 program year, funded organizations that kept residents from becoming homeless include Alternatives to Violence providing safehousing for survivors of family violence, and Neighbor to Neighbor and St. Vincent de Paul Society providing rent assistance.

Other funded agencies working on housing, health, social services, employment, or youth needs include:

- The Loveland Housing Authority providing emergency grants and no/low interest loans for housing rehabilitation to keep families housed;
- Loveland Housing Authority's Aspire 3D working with families to increase income and other supports to increase the likelihood of staying housed;
- Lago Vista Neighborhood, a program in the Lago Vista mobile home park, working with youth on their education;
- Homeward Alliance working with people affected by COVID regain employment.

Some of the listed projects were funded with City of Loveland general tax dollars and not CDBG.

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, 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 veterans, which by definition includes a shortened time period that veterans experience homelessness.

Archdiocesan Housing, with partners BlueLine Development and Shop Works Architecture, submitted and received a 9% Low Income Housing Tax Credit award to build 54 units of supportive housing this year. Ground breaking will occur in April 2022. A conceptual housing project that could bring 44 micro-units to Loveland is under discussion. These two housing projects could significantly reduce homelessness in Loveland, potentially by 50-60%.

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. During the 2020-2021 program year, the Loveland Housing Authority received \$211,522 in CDBG and a waiver of building and development fees in the amount of \$161,121 to rehabilitate 72 units of affordable housing in the Brookstone apartment complex. In 2019, the 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 organization received a waiver of 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 four years, the Loveland City Council waived \$3.4 million in fees for 317 units of both single family and multi-family housing for Loveland residents. 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 to provide a lower costing home.

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 for the second year 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 haircut, 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. A second moratorium on removing camps has been in place for over a year now.

Community 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 improvements 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 and no homes were made completely lead free during the program year.

During the program year, the Community Partnership Office worked with Volunteers of America/Handyman program and Loveland Housing Authority/Larimer Home Improvement program to

increase their knowledge of lead paint regulations and take additional precautions to keep families safe while providing necessary home rehabilitation. Additional training will be scheduled with Loveland Housing Authority staff.

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, with the current exception of winter shelter, but funds organizations that work to lift families out of poverty.

Loveland Housing Authority started a substantial rehabilitation project of the Brookstone Apartments during the program year. The City of Loveland obligated funding for this project prior to November 2020 and will not be reporting Section 3 information in IDIS but will request a copy of Section 3 information generated by the Division of Housing.

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. Community Partnership Office staff has also provided a structure for non-profit agencies 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 by hosting a monthly meeting to have agency staff share their program information, although the meetings have been at least temporarily discontinued because of the pandemic. 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 meeting is to ensure that an organization provides a warm hand-off to another organization 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 60-70 new single family homes started in 2021, with a two-bedroom home for sale below \$233,000.

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 and 2020, the City of Loveland completed a Fair Housing Loveland Actions document that was submitted with the CAPER. Because comments have not been received, the Community Partnership Office will wait to complete another iteration and requests follow-up from the Office of Fair Housing to better understand if the actions taken by the City of Loveland over the past two years keep us on-track with actions taken.

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 has hired an additional staff member to complete the monitoring of older projects and meet the six month deadline going forward. A shorter monitoring form was developed in 2020 for projects that are regularly funded using CDBG. The shorter form has increased the speed with which projects are monitored. A full monitoring will occur for regularly funded projects 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 started working with agencies on Limited English Proficiency and Effective Communication policies with the help of a national expert in 2021. A meeting with local non-profits was mandatory for agencies that receive Community Development Block Grant funding from the City of Loveland and highly encouraged for agencies that receive other Federal funding. Follow-up will include ensuring completed plans are accessible to customers of funded organizations. At some point, the ability to apply for any City of Loveland Community Partnership Office funding will be dependent on completing these vital documents.

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.

Efforts to provide citizens with an opportunity to comment on performance include a 15 days comment period that began the day after a Public Hearing that was held on December 14, 2021. The Public Hearing was advertised in the Reporter-Herald. A draft version of the report was sent to the Affordable Housing and Human Services Commissions, as well as funded agencies.

No one attended the public hearing that was held on December 14, 2021. No comments were received during the public comment period.

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 2020.

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 – 2020/2021 CAPER

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Resumen ejecutivo - CAPER 2020/2021

Durante el primer año del Plan Consolidado 2020-2024, la Ciudad de Loveland esperaba completar el 20% de las metas de 5 años. Al final del año del programa, ninguno de los proyectos del año 2020-2021 estaba en camino de cumplir con ninguno de los objetivos, aunque los proyectos completados durante el año avanzaron los objetivos de nuevas viviendas multifamiliares y rehabilitación de viviendas unifamiliares y multifamiliares en el Plan Consolidado 2015-2019. La información y los logros por tipo de proyecto incluyen lo siguiente:

- **VIVIENDA NUEVA.** No se financiaron nuevos proyectos de vivienda durante el año del programa 2020-2021. Sin embargo, la Autoridad de Vivienda de Loveland completó y arrendó 69 unidades de viviendas multifamiliares para personas que viven entre el 30% y el 60% del ingreso medio del área, un proyecto que fue financiado en 2019 y aumentó la meta de vivienda nueva en el Consolidado 2015-2019 Plan.
- **INSTALACIONES PÚBLICAS.** Una organización recibió financiación para un proyecto de instalación pública, pero ese proyecto se ha retrasado. Cuando el proyecto esté terminado, la meta estará completa en un 33% en términos de la cantidad de proyectos de instalaciones públicas esperados durante los cinco años de este Plan Consolidado, y potencialmente el 50% de la cantidad de personas atendidas en instalaciones públicas financiadas con CDBG.
- **SERVICIOS PÚBLICOS.** 478 personas recibieron servicios de las agencias que recibieron fondos para servicios públicos, lo que es poco menos del 10% de la meta de cinco años. A continuación, 57 personas se enumeran bajo camas para personas sin hogar. Ese número también está incluido en el 478.
- **REHABILITACIÓN DE VIVIENDA.** No se financió ningún proyecto de rehabilitación de viviendas durante el año del programa 2020-2021, aunque 54 hogares recibieron asistencia para la rehabilitación de viviendas de proyectos que fueron financiados en 2017 y 2019, aumentando esa meta en el Plan Consolidado 2015-2019.

Las Comisiones de Servicios Humanos y Vivienda Asequible utilizaron los datos de logros del Plan Consolidado 2015-2019 para determinar los resultados del plan actual. Los cambios realizados por organizaciones sin fines de lucro después de la presentación del plan, específicamente los objetivos de rehabilitación de viviendas, ahora corren el riesgo de no cumplirse en los próximos cinco años.

Las subvenciones CDBG-CV de la ciudad de Loveland ayudaron a 241 familias con asistencia con los servicios públicos, 30 familias con asistencia con el alquiler, 14 personas en busca de un nuevo trabajo, 78 personas que utilizan los servicios de dos centros de día para personas con discapacidades a mantenerse seguras con desinfección continua, 26 personas con refugio no congregante para recuperarse de COVID en un motel, y 62 personas que viven en viviendas públicas acceden a asistencia laboral y otras necesidades relacionadas con COVID.

2020 FHEO Supplemental

FHEO CAPER Supplemental - 2019-2020

Agency	Program	IDIS	Fem. HH	Disabled	Homeless	Seniors	Total Clients	Notes
Loveland Housing Authority	Housing Rehab/LHIP	295	4	2	0	3	5	
Easterseals	Public Facility	307	0	25	0	0	25	
Volunteers of America	Housing Rehab	310	*	28	0	28	29	
Loveland Housing Authority	New Housing/Edge II	311	48	15	18	23	69	
Loveland Housing Authority	Housing Rehab/LHIP	312					0	Expected to start in 2022.
Loveland Housing Authority	Housing Rehab/Willow Park	313	19	0	0	0	20	
House of Neighborly Service	CV	314	72	34	0	31	241	
Neighbor to Neighbor	CV	316	7	2	0	0	30	
Alternatives to Violence	Public Service	318	9	8	80	3	80	
Homeward Alliance	Public Service	319	19	153	341	75	341	
Catholic Charities	Public Service	320	1	18	57	12	57	
Alternatives to Violence	Public Facility	321					0	Project started in December 2021.
Homeward Alliance	CV	323	3	3	9	1	14	
Alternatives to Violence	CV	324					0	
Easterseals	CV	325	12	64	0	2	64	
Salvation Army	CV	326	10	23	26	6	26	
Respite Care	CV	327	7	14	1	0	14	
KidsPak	CV	328					0	
Aspire 3D	CV	329	17	13	0	12	62	
ChildSafe	CV	330					0	
Sunrise Health Clinic	CV	331					0	
Loveland Housing Authority	Housing Rehab/Brookstone	332					0	
* No children in the home so this isn't tracked.			228	402	532	196	1077	
** Disproportionate percentage homeless because homeless programs are funded.			21.2%	37.3%	49.4%	18.2%		Percentage of total people served
			50.7%	19.7%	**	18.6%		Loveland data
				51810				Table
Project is open								
2020-2021 Projects								

CAPER Supplemental - 2020-2021

Agency	Program	IDIS	1	Hispanic	2	3	4	5	6	7	8	9	10	Total	Notes
Loveland Housing Authority	Housing Rehab/LHIP	295	5											5	
Eastersals	Public Facility	307	20	3		1							4	25	
Volunteers of America	Housing Rehab	310	28	1		1								29	
Loveland Housing Authority	New Housing/Edge II	311	50	6	6	2	2						9	69	
Loveland Housing Authority	Housing Rehab/LHIP	312												0	Project hasn't started
Loveland Housing Authority	Housing Rehab/Willow Park	313	19	4	1									20	
House of Neighborly Service	CV	314	214	63	7			1		2	1		16	241	
Neighbor to Neighbor	CV	316	22	12	4								4	30	
Alternatives to Violence	Public Service	318	61	12	4		1						14	80	
Homeward Alliance	Public Service	319	271	52	28	3	23	3					13	341	
Catholic Charities	Public Service	320	43	3	6		2	1	2		1		2	57	
Alternatives to Violence	Public Facility	321												0	Project hasn't started
Homeward Alliance	CV	323	14	5										14	
Alternatives to Violence	CV	324												0	
Eastersals	CV	325	62	7			1						1	64	
Salvation Army	CV	326	26	4										26	
Respite Care	CV	327	10	2	2	1	1							14	
KidsPak	CV	328												0	Project hasn't started
Aspire 3D	CV	329	51	14	10		1							62	
ChildSafe	CV	330												0	
Sunrise Health Clinic	CV	331												0	
Loveland Housing Authority	Housing Rehab/Brookstone	332												0	Project in process
TOTALS for FY 2020-2021 funded projects only for QICR-10			896	188	68	8	31	5	2	2	2	0	63	1077	
			896	188	68	8	31	5	2	2	2	0	63	1077	TOTALS
CATEGORIES			83.2%	17.5%	6.3%	0.7%	2.9%	0.5%	0.2%	0.2%	0.2%	0.0%	5.8%	Sub-recipient percentages	
1: White			83.95%	12.98%	0.87%	1.15%	0.88%	0.09%	2.10%	0.67%	0.63%	0.03%	4.03%		
2: Black/African American			76378	64121	9916	661	881	672	71	1601	514	483	26	3075	
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															

Agencies served fewer than Loveland average.
by more than 10%

Leveraging 2020-2021

Agency	Program	IDIS	CDBG	Other	Total	Notes
Loveland Housing Authority	Housing Rehab/LHIP	295	\$ 83,532	\$ 257,000	\$ 340,532	\$70,200 EN, \$13,332.27 PL
Easterseals	Public Facility	307	\$ 3,549		\$ 3,549	
Volunteers of America	Housing Rehab	310	\$ 22,000	\$ 17,756	\$ 39,756	
Loveland Housing Authority	New Housing/Edge II	311	\$ 200,000	\$ 21,967,571	\$ 22,167,571	
Loveland Housing Authority	Housing Rehab/LHIP	312	\$ 40,000	\$ 293,068	\$ 333,068	
Loveland Housing Authority	Housing Rehab/Willow Park	313	\$ 28,377		\$ 28,377	
House of Neighborly Service	CV	314	\$ 50,000		\$ 50,000	
Neighbor to Neighbor	CV	316	\$ 100,000		\$ 100,000	
Alternatives to Violence	Public Service	318	\$ 15,000	\$ 378,409	\$ 393,409	
Homeward Alliance	Public Service	319	\$ 18,361	\$ 362,859	\$ 381,220	
Catholic Charities	Public Service	320	\$ 24,000	\$ 126,046	\$ 150,046	
Alternatives to Violence	Public Facility	321	\$ 42,500		\$ 42,500	
Homeward Alliance	CV	323	\$ 77,000		\$ 77,000	
Alternatives to Violence	CV	324	\$ 12,213		\$ 12,213	
Easterseals	CV	325	\$ 13,908		\$ 13,908	
Salvation Army	CV	326	\$ 10,000		\$ 10,000	
Respite Care	CV	327	\$ 5,220		\$ 5,220	
KidsPak	CV	328	\$ 25,000		\$ 25,000	
Aspire 3D	CV	329	\$ 50,068		\$ 50,068	
ChildSafe	CV	330	\$ 1,237		\$ 1,237	
Sunrise Health Clinic	CV	331	\$ 150,000		\$ 150,000	
Loveland Housing Authority	Housing Rehab/Brookstone	332	\$ 211,522	\$ 12,973,381	\$ 13,184,903	
			\$ 1,183,487	\$ 36,376,090	\$ 37,559,577	

2021 Loveland Fair Housing Actions

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 2020-2021, agency data indicates a greater percentage of people served for all self-reported racial categories except Asian, American Indian/Native Alaskan & White, Asian & White, and Black/African American & White. For all racial categories except American Indian/Native Alaskan & White, the difference is fewer than six people.
- ✓ The Community Partnership Office was not able to address the number of people served in all racial categories in either 2020 or 2021 with additional work due to COVID-19, but will start in 2022 by reviewing agency intake forms to determine if all racial categories are listed to better understand if people are checking a multi-racial box because a more accurate option is not provided.
- ✓ 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 works with a staff member certified in Spanish language translation or 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 completed in 2020, and included community outreach in English and Spanish.
- ✓ The CPO advertises 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.
- ✓ In 2021, the City of Loveland scheduled two work sessions with a national expert to help funded agencies complete a Limited English Proficiency and Effective Communication Plan. Agencies will be expected to complete these plans and provide employee training. The CPO will request an update in 2022 to understand the status of completing both reports and the completion of vital document translation.
- ✓ A Title VI plan for the City of Loveland has been adopted. Employee training will likely occur in 2022.
- ✓ 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.
- ✓ The CPO will monitor funded agency websites for the availability of Spanish translation in 2022.

- 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"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.

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 Grantee or Grantee's subrecipients to collect the race, ethnicity, and sex of those applying for or benefiting 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 start asking for this data if requested by the Office of Fair Housing.

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 has 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. The Community Partnership Office did not ask for a list of projects completed in 2021 soon enough to add to this report.
- ✓ 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 2020-2021, agency data indicates a greater percentage of persons with disabilities (37.3%) 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_opp/disabilities/sect504faq

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

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 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 a sign-language interpreter to accommodate people with hearing impairments if needed. 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, 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 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 at that time. 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 added to 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 would 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 is transitioning to the new Section 3 requirement and engaged in the three day training available in December.
- ✓ The City of Loveland was up-to-date with Section 3 reporting via SPEARS prior to the Section 3 reporting move to IDIS.

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 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."

- ✓ 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 and 2021 but was unable given additional work required to address COVID-19. This will be completed in 2022.

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.

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

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

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

⁹ 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 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 websites 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 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

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>

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:

- ✓ 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 was completed in 2021 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% initially. 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.
- ✓ In 2020 and 2021, 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.
- ✓ 1,810 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 \$2,262.50. The number of passes is down significantly from 2019 when 3,900 were distributed.
- ✓ Loveland City Council continue to participate in annual proclamations for Martin Luther King Jr day.
- ✓ The City of Loveland proclaimed April as Fair Housing month. The CPO was unable to place a Fair Housing month advertisement in the City of Loveland utility bill that is mailed to about 39,000 residents. In years prior, the ad provides information about who to call with a complaint or talk about housing issues. The CPO will try to place this ad in April 2022.
- ✓ 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.

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- ✓ In 2019, the City of Loveland helped an agency that provides day center services 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 three prioritized sidewalk gap projects in 2021, improving connectivity for low income residents who use public transportation or walk to school. All project update accessibility as required. Sidewalk prioritization includes 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. A new transportation master plan, Connect Loveland, was 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 ¾ 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 granting land to Archdiocesan Housing (AHI) to build 54 units of supportive housing in Loveland. AHI worked with neighbors to significantly reduce NIMBY issues that result from projects housing homeless residents.

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

- ✓ 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 house homeless residents.
- ✓ 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 continuation of addressing COVID-19 and distributing additional grant funding left little time to create projects that Affirmatively Further Fair Housing. The CPO hired a part-time staff member who will work on these projects in 2022.

Public Notice

1/3/22, 4:33 PM

Public Notices | Colorado Press Association

Notice of Hearing



Published in Loveland Reporter Herald on December 7, 2021

Location

Larimer County, Colorado

Notice Text

TO ALL CITIZENS OF LOVELAND: The City of Loveland Community Development Block Grant (CDBG) Consolidated Annual Performance and Evaluation Report (CAPER) for the 10/1/20-9/30/21 fiscal year is available for public review and comment. The report contains information regarding the progress the City has made in carrying out its strategic plan for the use of CDBG funds during the 2020-2021 program year. The report may be reviewed at the Community Partnership office at 500 E. Third Street, Ste. 210. A copy may also be obtained via the City's website at www.cityofloveland.org/communitypartnership, or will be mailed or emailed upon request. Any comments or questions regarding the report should be directed in writing to the City of Loveland Community Partnership Office, 500 E. Third Street, Ste. 210, Loveland, Colorado 80537, by calling (970) 962-2517 between 8:00 a.m. and 5:00 p.m. Monday through Friday, or via e-mail at alison.hade@cityofloveland.org. Comments on the CAPER will be accepted through December 29, 2021. A LARGE PRINT COPY IS AVAILABLE. For TDD/TTY assistance, please call (970) 962-2620. A public hearing for the 2020-2021 CAPER will be held on Monday, December 14, 2021 at 5:00 pm via Zoom meetings (access below). PARA TODOS LOS CIUDADANOS DE LOVELAND: El Reporte Consolidado de Rendimiento y Evaluación Anual (CAPER, por sus iniciales en inglés) del Ramo de Desarrollo Comunal (CDGB, por sus iniciales en inglés) de la Ciudad de Loveland para el año fiscal desde OCT/1/20 hasta SEP/30/21 está disponible para que el público lo pueda revisar y pueda comentar. El reporte contiene información acerca del progreso que la Ciudad ha tenido para llevar a cabo su plan estratégico para el uso de los fondos de CDBG durante el año 2020-2021 del programa. El reporte se puede revisar en la oficina de Community Partnership en 500 E. Third Street, Ste. 210. También se puede obtener una copia en la página web de la Ciudad en www.cityofloveland.org/communitypartnership o se enviar por correo o correo electrónico a petición. Todas las preguntas o comentarios acerca del reporte se deben enviar por escrito a City of Loveland Community Partnership Office, 500 E. Third Street, Ste. 210, Loveland, Colorado 80537, puede llamar al (970) 962-2517 entre las 8:00 a.m. y las 5:00 p.m. de lunes a viernes, o por e-mail a alison.hade@cityofloveland.org. Se van a aceptar comentarios acerca de CAPER hasta 29 de diciembre de 2021. HAY UNA COPIA EN LETRA GRANDE DISPONIBLE. Para asistencia TDD/TTY, por favor llame al (970) 972-2620. Una audiencia pública para el CAPER 2020-2021 se llevará a cabo el lunes 14 de diciembre de 2021 a las 5:00 p.m. a través de zoom (acceso indicado abajo). Join Zoom Meeting <https://us06web.zoom.us/j/89954263421?pwd=bjVzRjBEQUFpaEovMzZ5eXdwejdUZW09> Phone: (346) 248-7799. Meeting ID: 899 5426 3421. Passcode: 177795. Published: Loveland Reporter Herald December 7, 2021-1853382

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