



**22 South 4th Avenue, Suite 202
Brighton, Colorado 80601**

2025: VISION FOR BHA'S MTW PROGRAM – CO019

It is the vision of the Brighton Housing Authority (BHA) for rental assistance programs to provide more than just a roof overhead. Affordable housing – particularly the Brighton Housing Authority Housing Choice Voucher Program – can be the gateway to a better life and self-sufficiency.

A cornerstone of that gateway is the Moving to Work (MTW) Program.

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I. Introduction

The opportunity to participate in the Moving to Work (MTW) program is a tremendous opportunity for the Brighton Housing Authority (BHA or CO019). As a small PHA included within the Denver Metropolitan Area, BHA enjoys many benefits of that proximity to region, but a local reality is that the City of Brighton is a much smaller community on the border between a major urban area and the much more rural areas just beyond the jurisdiction. Brighton has seen tremendous growth in the last few decades that has seen the once remote less-urban satellite of the metro area become a sprawling city. However, the prosperity has not been uniform.

While sections of Brighton have virtually sprung right out of the ground and feature large new homes and economic opportunity for commuting settlers in the region, the residents of the older portion of Brighton have not benefited as much from the boom. Senior housing was limited, local schools chronically underfunded, and several major employment opportunities vanished. The metropolitan increases in homelessness, coupled with Brighton's connectivity to the Denver area and favorable sites for homeless camps in the area that are undisturbed by the authorities, have seen homelessness on the rise in the city. Service capacity for combating homelessness in the jurisdiction was historically limited as this issue was generally invisible to the public and policymakers.

BHA has sought to change many of those new realities for the jurisdiction. Over the last ten years, this agency has seen explosive growth and activity in combating some of those challenges within the bounds of the traditional Housing Choice Voucher (HCV) program while simultaneously developing a wider coalition-based strategy. One visible impact of that strategy has been the development and acquisition of affordable housing; another strategy has been focusing on reducing the demand for HCV assistance in the first place. MTW provides another tool for BHA to combat these local needs.

At the height of the COVID-19 pandemic, BHA was able to secure substantial relief funds and has had great success in delivering those funds to those most in need. As a public housing authority with great access to the most vulnerable populations experiencing housing instability or insecurity, BHA expanded internal capacity to offer a wider array of services than traditionally offered by a non-MTW program. The flexibility offered under MTW has provided a method to continue to build upon providing those services to the greater Brighton community beyond the families already served by the HCV program.

In conjunction with the Tenant-based Rental Assistance program supported by Adams County grant funding, the BHA services department is seeking to expand the scope of their work in transitioning families off subsidy-supported rental assistance and move them into self-supported affordable rental markets. Under the Adams County funded grant, current HCV holders or the public at-large are unable to access those services fully. By reallocating a portion of the Housing Assistance Payment (HAP) funds to supportive services, BHA's position and ability to transition families off subsidy programs is strengthened. HAP funding will remain adequate to support substantially the same number of families assisted prior to the MTW conversion, and there are even sources of funds dedicated to the release of additional vouchers to bring new families onto the HCV program. It should be noted though that the Tenant-based Rental Assistance Program operated in 2024 is set to sunset on December 31, 2024, and may not be renewed unless additional grants are secured.

Beyond enhancing the services department to provide direct services, BHA is continuing its strategy of developing more robust incentives for working participants. BHA previously focused on working young adults and the working disabled. This year sees the development of tiered rent schedules to further assist working families or families receiving higher incomes.

The financing and development of affordable housing is as difficult and complex as it was in 2024. Therefore, 2025 sees BHA remain committed to alternative opportunities for families not receiving HCV assistance by

exploring funding opportunities to construct or rehabilitate affordable housing projects. For 2025 two additional projects are proposed to be added to the eligibility list.

The following is a list of the activities identified in the 2025 Plan – it includes all activities proposed, re-proposed, implemented, not yet implemented, or on hold. Only activities identified as either “Proposed” or “Re-proposed” are 2025 changes to the BHA MTW program. The others are included simply for ease of reference.

PROPOSED	
	<i>There are no entirely new activities proposed for this submission</i>

RE-PROPOSED	
2023-3.B	Housing Development Programs (Expanded Project List #2)

IMPLEMENTED	
2022-1	Alternative Utility Allowance
2022-2	Utility Reimbursements
2022-4	Rent Reasonableness - Third-party Requirement
2022-5.A	Alternative Reexamination Schedule for Households (Senior, Disabled)
2022-6	Self-certification of Assets
2022-7	Third-party Requirement
2022-8	Increase PBV Program Cap
2022-9	Increase PBV Project Cap
2022-10	development, or replacment
2022-11	Limit Portability of PBV Units
2022-12.A	Service Provision
2022-13.A	Alternative Income Exclusions-I
2023-1	Implementation of Payment Standards at Effective Date (Senior, Disabled)
2023-2	Alternative Income Exclusions-III
2023-3.A	Housing Development Programs (Expanded Project List)

NOT YET IMPLEMENTED	
2024-1	Tiered Rent

ON HOLD	
2022-14.A	Alternative Income Exclusions-II
2022-3	Initial Rent Burden
2023-4	Term-Limited Assistance
2023-5	Local Non-Traditional Homeownership Option (Agency Specific)

Plan for Local MTW Program

Highlights of the 2025 MTW Plan are:

1. **Implementation of Progress Pathways rent schedules:** Although the tiered rents were proposed for 2024, their implementation has been delayed and they are planned to be implemented in early 2025.
2. **Commitment to Housing+:** Entering its fourth year, BHA’s broader emphasis to alternative housing solutions beyond monthly subsidies. 2025 will see BHA continue to add to the list of eligible projects for using MTW funding flexibility.

The specific MTW objectives targeted by the plan are found within the individual waiver analysis.

II. Plan for Future Community/Resident Engagement

BHA will continue its outreach engagement efforts with no less than one annual resident meeting, one property owner meeting, or one PHA board meeting with a specific public engagement agenda item. Information on these meetings will be posted on the BHA website and disseminated to the residents and community through a community engagement and outreach coordinator; the coordinator will also conduct affirmative outreach and engagement efforts with racial and ethnic minorities, persons with limited English proficiency, persons with disabilities and groups representing such persons.

There are two (2) public hearings related to this MTW Supplement prior to the board meeting where the final draft of this plan is set to be adopted.

- **Public Hearing on the 5-Year Plan, Annual Plan, and 2025 MTW Plan – Monday, November 5, 2024, at 1:00 P.M.**
- **Public Hearing on the 2024 MTW Waivers – Monday, November 5, 2024, immediately following the public hearing on the 5-Year Plan**

These public hearings are preceded by a 45-day comment period. Besides a public notice appearing on both the BHA website (www.brightonhousingauthority.org) and in the Brighton Standard Blade newspaper, specific efforts to target stakeholders will be undertaken during the public comment period.

III. General Operating Information

A. BHA PROGRAMS SPECIFICATIONS

1. Housing Choice Voucher (HCV) Program

BHA operates an HCV program that currently has a cap of 255 vouchers. It is projected that as of September 1, 2024, voucher utilization is forecast to be approximately 88% while budget authority expended for 2024 is projected to be roughly 100%.

2. Rental Assistance Demonstration (RAD) Program

In 2017 BHA underwent a RAD conversion of its remaining public housing units. The result is that BHA has no public housing units but instead has eleven (11) RAD units. (There is one two-bedroom unit in inventory with the remaining ten being three-bedroom.) These units are supported by project-based RAD vouchers. RAD units are a subcomponent of the HCV program and are included in the HCV voucher count.

3. Project-Based Voucher (PBV) Program

The non-RAD PBV program consists of fifteen (15) units located at Windmill Ranch Apartments. All the PBV units at that site are three-bedroom units. Like RAD, the PBV units are a subcomponent of the HCV program and are included in the HCV voucher count.

In 2024 BHA submitted notice to HUD of its intent to project base additional vouchers. As of September 1, 2024, it is projected that BHA will assign nine (9) project-based vouchers to the Hughes Station Apartments. These vouchers are scheduled to come online in 2025 and consist of a mix of two- and three-bedroom units.

4. Portability

In addition to the local HCV program, BHA operates an extensive port-in program. As of September 1, 2024, there were roughly 60 port-ins to the jurisdiction administered by BHA. Port-ins are not included in the HCV voucher count.

B. HOUSING STOCK INFORMATION

1. Planned New Project-Based Vouchers

BHA has notified HUD of its intent to project-base up to fifteen (15) project-based vouchers to Hughes Station Apartments.

2. Existing Project-Based Vouchers

Property Name	# of Project-Based Vouchers	Status	RAD?	Description of Project
Jessup Street Apartments	11	Leased	Yes	Multifamily
Windmill Ranch Apartments	15	Leased	No	Multifamily

3. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

As previously approved by the BHA Board, the scattered site development portfolio will continue to be sold off in a reasonable and prudent manner. It is estimated that one or two properties will be sold in 2025.

4. General Description of All Planned Capital Expenditures During the Plan Year

The RAD Phase II project at some former public housing sites will be fully complete and occupied in 2025. The Hughes Station Apartments will undergo substantial rehabilitation in 2025. The RAD Phase II project was funded with development and did not utilize MTW funding flexibilities. The Hughes Station Apartments project may be assisted with up to \$369,000 of local non-traditional MTW funding flexibility. As permitted by MTW activity 2023-3.B (Housing Development Programs – Expanded Project List #2) BHA may provide gap financing in 2025 to the Hughes Station Apartments or two more sites under development – Ravenfield or Adam’s Point. (A proposed senior affordable housing project and multifamily affordable housing project respectively.)

C. LEASING INFORMATION

1. Planned Number of Households Served

Planned Number of Households Served Through:	Estimated Number of Unit Months Occupied/Leased	Estimated Number of Households Served
MTW Housing Choice Vouchers (HCV) Utilized*	2,716	226
Local Non-Traditional: Tenant-Based**	0	0
Local Non-Traditional: Project-Based**	0	0
Local Non-Traditional: Homeownership**	0	0
Planned Total Households Served	2,716	250

*Includes RAD and PBV households.

**The local non-traditional were only pilot programs, are not MTW funded, and the grants will conclude at the end of 2024.

2. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

With the change to triennial reexaminations, there were unanticipated complications related to naturally occurring rent increases, rising utility costs, and payment standards. HUD subsequently approved BHA to implement an MTW waiver which permitted the implementation of updated payment standards at the time of a rent increase which has alleviated the problem. The project-basing of additional units in 2025 was also designed to address a limited housing stock issue.

D. WAITLIST INFORMATION

1. Waiting List Details

As the HCV tenant-based waitlist is replaced each year on December 31st, the below provided data is for the 2024 waitlist. For 2025, the tenant-based HCV waitlist was opened September 4, 2024, through September 5, 2024. What follows is some general information regarding waitlists.

BHA has adopted only one preference – local. Due to the difficulties of verifying families claiming homelessness and with that preference limited to only two (2) vouchers per year, BHA made the decision to remove the limited homelessness preference and dropped in for 2025 and going forward. Applicants can apply to multiple waitlist lists and therefore often appear on multiple waiting lists.

Waiting List Name	Description	# of Households on Waiting List	Waiting List Open or Closed	Plans to Open the Waiting List During the Plan Year
Housing Choice Voucher -- Tenant-Based	HCV Lottery	1,083	Closed	Yes
Jessup RAD (Three-Bedroom)	RAD PBV Units - Preferences, Date/Time	343*	Closed	No
Jessup RAD (Two-Bedroom)	RAD PBV Units - Preferences, Date/Time	972*	Closed	No
Windmill Ranch (Three-Bedroom)	PBV Units - Preferences, Date/Time	750*	Closed	No

*These numbers include families that would not qualify for the PBV unit based on family size and would subsequently be removed once occupancy standards are applied during the eligibility process.

2. Planned Changes to Waiting List in the Plan Year

Except for the annual tenant-based waitlist purge on December 31st, there are no anticipated changes to the waiting lists this year.

IV. Proposed MTW Activities: HUD Approval Requested

2023-3.B HOUSING DEVELOPMENT PROGRAMS EXPANDED PROJECT LIST #2

REVISION TO 2023-3.A (APPROVED 2023)

STATUS: PROPOSED

Description of Activity

BHA is requesting an expansion to the optional support programs that use MTW Funding to acquire, renovate and/or build affordable units for low-income families that are not public housing units. Eligible activities may include gap financing for non-PHA development of affordable housing, development of project-based voucher units or tax credit partnerships. BHA will not spend more than 10% of its HAP budget on all local non-traditional activities authorized by its MTW flexibilities.

- This activity will promote housing choice as the funding will help support the development of affordable housing.
- The list of eligible projects will be expanded to include Hughes Station Apartments (already on the list of approved projects), and Ravenfield (being added), and Adam's Point (being added).

Cost Implications

This activity could result in less funding being available for supporting direct HCV assistance. However, the substantially the same requirement will continue to be met.

Hardship Policy

Not applicable.

Authority/Justification

This waiver falls under section 17.c of the MTW Operations Notice. The waiver will adhere to all safe harbor requirements.

V. Approved, Implemented MTW Activities

2022-1	ALTERNATIVE UTILITY ALLOWANCE
2022-2	UTILITY REIMBURSEMENTS
2022-4	RENT REASONABLENESS – THIRD PARTY REQUIREMENT
2022-5.A	ALTERNATIVE REEXAMINATION SCHEDULE FOR HOUSEHOLDS (SENIOR, DISABLED)
2022-6	SELF-CERTIFICATION OF ASSETS
2022-7	THIRD-PARTY REQUIREMENT
2022-8	INCREASE PBV PROGRAM CAP
2022-9	INCREASE PBV PROJECT CAP
2022-10	ELIMINATION OF PBV SELECTION PROCESS FOR PHA-OWNED PROJECTS WITHOUT IMPROVEMENT, DEVELOPMENT, OR REPLACEMENT
2022-11	LIMIT PORTABILITY OF PBV UNITS
2022-12.A	SERVICE PROVISION
2022-13.A	ALTERNATIVE INCOME EXCLUSIONS-I
2023-3	HOUSING DEVELOPMENT PROGRAMS
2023-1	IMPLEMENTATION OF PAYMENT STANDARDS AT EFFECTIVE DATE
2023-2	ALTERNATIVE INCOME EXCLUSIONS-III

VI. Unapproved, On Hold MTW Activities

2022-14.A	ALTERNATIVE INCOME EXCLUSIONS-II
2022-3	INITIAL RENT BURDEN
2023-4	TERM-LIMITED ASSISTANCE
2023-5	LOCAL NON-TRADITIONAL HOMEOWNERSHIP OPTION (AGENCY SPECIFIC)

VII. Not Yet Implemented MTW Activities

2024-1	TIERED RENT
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VIII. Proposed Use of MTW Funds

Since Congress has yet to pass a 2025 budget, the figures used are from 2024 approved and funded levels. Once a 2025 budget is known, those figures will be used but spending breakdowns (% of total budget authority) will remain the same.

Since the RAD conversion concluded BHA’s participation in the public housing program, the HCV program is the primary source of MTW funding. Current estimates place BHA’s 2024 expenditures at just about \$3 million. Administrative funding was projected using current prorations and leasing data.

Source	Projected Funding
2024 ACC HAP Renewal	\$3,414,122
2024 HCV Administrative Fees	\$279,420

No less than 90% of BHA’s 2025 renewal funding expenditures will be used for Housing Assistance Payments (HAP). The remaining 10% of BHA’s 2025 annual HAP funding can be split between the activities described in 2023-3.B and 2022-12.A. The 10% is also subject to BHA continuing to meet the MTW substantially the same requirement and will be adjusted if needed.

Uses for 2024 ACC HAP Renewal Funding	Estimated Expense	Usage in % of Total Budget Authority
Housing Assistance Payments (HAP)	\$3,228,293	90%
Service Programs	\$75,258	5%*
Housing Development Programs	\$239,000	5%*

*These are only estimates as the actual costs for the housing development needs are unknown at this time. However, the combined expenditures on service programs and housing development programs shall in no circumstances exceed 10% of BHA’s 2025 HAP budget authority.

Administrative fees earned will continue to be spent on traditional HCV purposes.

IX. Significant Partnerships

As described in the Vision for PHA's Local MTW Program, this agency has long sought to reduce the general demand for HCV assistance since there are only so many vouchers available and limited funding for them. Starting in 2011, BHA hosted an annual Applicant Assistance Program (AAP) in conjunction with the opening of the HCV lottery waitlist. The AAP is a way to bring other agencies together at the same time and at the same place where individuals and families in need of assistance are already present due to the HCV lottery. BHA is aware that this agency will not be able to help every individual and families that applies for HCV assistance. However, it was identified that many of these same individuals and families could also benefit from connecting to other agencies that did have immediate supportive services available.

2020 was to have been the tenth year of the AAP, but due to COVID-19 it was unwise to schedule a large event bringing together roughly 20 agencies that provide resources covering board needs such as education, employment, and health. Many of the 20 or so participating agencies in the AAP had been attending the event for years and there is always a demand from more agencies that want to participate in future years. Though we have been unable to host recently, we have participated in events such as the Adams County Resource Fair, Brighton's Youth Services FAFSA nights, and college night events within the 27J School District.

BHA is currently reviewing options for bringing the AAP in-person event back in 2023.

Participant agencies, which fall within the statutory MTW objectives, include:

- Adams County Workforce & Business Center
- Adams County Community Safety and Well Being
- Almost Home
- Brighton Youth Services
- Cold Weather Care
- Early Childhood Partnership of Adams County (ECPAC)
- Front Range Community College
- Platte Valley Medical Health Center
- 27J School District

BHA built upon the success of the AAP and what the partnering agencies have to offer by expanding its internal service department and by hiring two service coordinators. The service coordinators have helped provide supportive services to the individuals and families in the community when it comes to housing and education needs.

In addition to those partnerships, BHA has well-established and effective relationships with the City of Brighton local government and the Adams County government. BHA plans to continue to expand partnerships with other agencies to provide more services to the community.

X. Administrative

This section will contain the Certifications of Compliance and the signed resolution once passed by the board in a final format.

