



CITIZEN PARTICIPATION PLAN

*for U.S. Department of Housing & Urban Development
planning and reporting activities*

August 2025

**City of Fort Collins Colorado
Social Sustainability Department
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Table of Contents

Introduction	3
Plan Overview and Emphasis	3
General Guidelines and Standards for Public Participation	4
Standards for Distribution and Access	4
Reasonable and Special Accommodations	5
Overall Citizen Participation Standards	6
Review Periods	6
Public Hearings	6
Notices for Meetings, Public Hearings and Review Periods	7
Additional Guidelines and Information for HUD’s Five Planning and Reporting Activities	9
Consolidated Plan (Five-Year Strategic Plan)	9
Annual Action Plan	9
Consolidated Annual Performance and Evaluation Report	9
Amendments	9
Consolidated Plan Amendment Guidelines	10
Annual Action Plan Amendment Guidelines	10
Citizen Participation Plan Amendment Guidelines	11
Other Guidelines and Information	11
Interdepartmental Coordination and Cooperation	11
Document Retention	12
Technical Assistance	12
Complaint Procedures	12
Response Standards for Citizen Complaints	12
Complaint and Response Process	12
Funding Application Complaints	13
Discrimination Complaints	14
Conclusion	14
Attachment A	15
Attachment B	17
Attachment C	19

Introduction

The City of Fort Collins receives an annual entitlement of Community Development Block Grant (CDBG) and HOME Partnership Program (HOME) funds from the U.S. Department of Housing and Urban Development (HUD). The grants provide funding for community development and housing activities that must primarily assist low- and moderate-income residents. Fort Collins has also received CDBG-COVID-19 (CDBG-CV) and HOME-ARP funding, and in the future may receive other HUD funds. The process by which the City determines its priorities, goals, and resources, and reports to HUD on progress in regard to grants is called the Consolidated Planning Process. It includes five separate but intertwined processes and resultant plans/reports:

- **Consolidated Plan (5-year strategic plan)**
- **Annual Action Plans (AAP)**
- **Consolidated Annual Performance and Evaluation Reports (CAPER)**
- **Citizen Participation Plan**
- **Substantial Amendments** to the Consolidated Plan, Annual Action Plans, or Citizen Participation Plan

The City of Fort Collins' mission is to provide "exceptional service for an exceptional community." In support of its overall Strategic Plan—and to the greatest extent possible—the City recognizes the importance of involving all community members in the planning and decision-making process of government. The goal of this Citizen Participation Plan is to fully integrate citizen input into these five planning and reporting activities required to successfully manage the City's current community development, housing, and other future U.S. Department of Housing and Urban Development (HUD) programs.

The Social Sustainability Department has primary responsibility for managing the citizen participation process and the development, implementation and reporting of annual accomplishments referenced in this Citizen Participation Plan. This plan also fulfills the requirements of federal regulation, 24 CFR Part 91.105.

Plan Overview and Emphasis

The City of Fort Collins intends to maximize programs and develop policies to have the greatest community impact possible. Effective and meaningful civic engagement is a strategy towards that goal. Fort Collins will encourage people who are intended to directly benefit from federal funds to participate in the formulation and implementation of projects to be funded with those dollars. These community members may include minority residents or other persons in a legally protected class, those who do not speak English or have limited English proficiency, persons with disabilities, female heads of households, residents who identify themselves as low- and moderate-income, unhoused community members, residents of assisted housing, and residents with disproportionately impacted identities.

Of particular importance is the participation of low- and moderate-income persons and residents of assisted housing. Special efforts will be made to include persons who are within one or more legally protected classes, who have English language barriers, or who are language isolated. Additionally, the City is committed to the meaningful public engagement of community members who may be part of a special population (such as at-risk youth), or who are considered to be in a federal Presumed Benefit category (such as persons experiencing homelessness or those living with HIV/AIDs).

The City will enlist nonprofit and community organizations, including faith-based groups, resident associations, housing and human service agencies and other groups, businesses, and developers, to assist the City with fully engaging residents in the planning and implementation of its federal programs. In addition, the City will leverage evolving communications strategies and media channels to promote this objective. Avenues to increase citizen input may include newsletters, news releases, webpage announcements, social media, email, or other print or electronic materials. The City will use communications strategies which specifically address and connect with the unique needs of sub-populations within our community.

This Citizen Participation Plan will be incorporated (by attachment or reference) into every Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance Report.

General Guidelines and Standards for Public Participation

The **Citizen Participation Matrix**, which organizes important process information in table form, is located in **Attachment A**. This Matrix is a quick reference tool, outlining all requirements for each planning and reporting activity. **Definitions** are provided in **Attachment B**.

Standards for Distribution and Access

The City provides reasonable and timely access to all meetings and documents required in the processes for the five reporting and planning activities and does not discriminate based on race, color, national origin, creed, religion, sex, sexual orientation, disability, or age and without regard to the exercise of rights guaranteed by state or federal law. Policies and procedures are in place to assist persons with limited English proficiency and/or disabilities.

Public review and comments are welcome at any point in the processes for the five reporting and planning activities. A summary of comments or views received, and a summary of any comments or views not accepted and the reasons why, will be attached to the final plans prior to requesting approval by City Council.

The City will encourage community input by:

- Posting ADA- and Title VI-compliant notices in *The Coloradoan*, Fort Collins' general circulation newspaper, in English and in Spanish.

- Posting ADA- and Title VI-compliant electronic notices in English and in Spanish on the Social Sustainability Department webpage. The City webpages are compatible with web readers for the visually impaired and connected to Google Translate.
- Distributing notices through partner agencies serving low- and moderate-income clients, people in legally protected classes, special populations, residents of CDBG/HOME-assisted housing developments, and Presumed Benefit categories. The notices will be shared by those community partners determined to be most appropriate and effective, according to the Social Sustainability Department and upon request.
- Providing opportunities for interviews, surveys, listening sessions, and/or focus groups, as appropriate.
- Providing paper copies of documents on request.
- Whenever possible, using specialized communications strategies to address the needs of unique subpopulations (e.g., persons experiencing homelessness, Spanish-speaking-only, female heads of households, etc.).

Reasonable and Special Accommodations

- Copies of the five reporting and planning activities documents will be made available online and offered in print upon request.
- Public input will be solicited online and/or in fully accessible locations.
- Public meetings and public hearings will take place online or in fully accessible locations.
- Upon request, the City will provide materials in Braille, large print, in Spanish or other languages as needed, or in a voice recording, at no cost to the requestor.
- The City's TDD/TYY number is: 970-221-3490.
- Interpretation services will be made available where it is reasonably anticipated there will be a significant number of non-English speaking residents in attendance and/or upon request
- City Council proceedings are available with Closed Captioning on the local government cable channel (Channel 14).
- The City will also deliver a copy of any Plan, Amendment or Report to a homebound person upon request.
- Reasonable notice for requests is usually considered to be 48 hours.
- Any content on the City of Fort Collins website may be immediately translated into any one of 249 languages. The Google Translate feature is located in the upper left corner of the City's Home page at: fcgov.com.
- Regulation 24 CFR Part 91.105 (b) (1) also requires that any HUD-funded project or program that may displace residents describe how the City will assist those displaced. The City's current Anti-Displacement Policy is an attachment to this document (**Attachment C**).

Overall Citizen Participation Standards

Review Periods

Thirty-day (30-day) Public Review Periods are federally required and specifically set aside for public comments and input:

- For federal funding allocation recommendations prior to any final City Council funding allocation decision.
- Prior to the submission of a Consolidated Plan to City Council for approval.
- Prior to the submission of an Annual Action Plan to HUD.
- Prior to the submission to HUD of any Substantial Amendment to the Consolidated Plan, an Annual Action Plan, or the Citizen Participation Plan.

A fifteen-day (15-day) Public Review Period is federally required and specifically set aside for public comments and input:

- Prior to the submission of a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD.


Waiver of federally required public comment periods:

- When, due to designated disasters or emergencies, HUD issues federal waiver guidance on the required minimum public review period, City staff will submit the prepared waiver request and documentation in order to deploy funding as expeditiously as possible.

Public Hearings

A minimum of two (2) federally required public hearings are held each Program Year to solicit citizen viewpoints and input. These public hearings are designed to ensure the City follows its purposes and proposed goals, and fully integrates citizen input into the corresponding documents in order to meet community needs. One public hearing will solicit viewpoints on community needs and the proposed use of funds. The second public hearing will be held to assess how funds were spent during the prior Program Year. To comply with regulations, the public hearings are held in person with an online option.

In addition, City Council holds a public hearing before making a final decision at the end of each funding allocation process. City Council also holds public hearings before adopting the Consolidated Plan or its Substantial Amendments, and changes to the most recently adopted or amended Citizen Participation Plan. Public hearings for each Annual Action Plan and their Substantial Amendments, are held by the Social Sustainability Department. Community members have varied opportunities throughout each Public Review Period to express their thoughts on the accuracy and content of the document under review.


 Public hearings are held in accessible locations. Hearings at Council meetings will be held at City Hall, and available online. Social Sustainability Department led hearings will be held at various locations across the community that are open to the public and accessible, such as the public library or a City-owned building or facility, and will have a hybrid option as practical. Interpretation services are made available when it is reasonably anticipated that there will be a significant number of non-English speaking residents in attendance and upon request.

When public health crises or other disaster response prohibits the City's ability to hold public meetings in person, City Council and/or Social Sustainability staff may elect to hold public hearings via an online platform, with appropriate notice and opportunity for reasonable accommodations and public comment.

Notices for Meetings, Public Hearings and Review Periods

At a minimum, notices for meetings, public hearings, and public review periods will be posted according to General Guidelines and Standards for Citizen Participation.

Meetings

Full and timely notice will be provided for all public meetings, in accordance with the Colorado Open Meetings Act.  Notices are posted on the City's event website and the Social Sustainability Department webpage. Notices include a summary of the content included in the meeting. Notices of pending meetings are posted at least 24 hours prior to a meeting. Notices of a meeting cancellation or a special meeting are posted at least 24 hours in advance of the change.

Public Hearings

Whenever possible, notice of a public hearing will be published at least fifteen (15) days* prior to the hearing, and never less than seven (7) days before a hearing. Additionally, General Guidelines and Standards for Public Participation will be followed. Those Guidelines and Standards in this document are intended to facilitate maximum citizen awareness, and participation in the Hearing.

Public Review Periods

All notices for a public review period will be published at least one (1) day prior to the beginning of the review period. General Guidelines and Standards for Public Participation will be followed.

Content in notices for public review periods will include the anticipated Community Development Block Grant and HOME Investment Partnership Program funding, any other HUD or City funding the City reasonably expects to receive, how the funds are proposed to be allocated, how to submit comments, and where further information is available.

Waivers for Disaster Recovery and Emergency Response

In the instance of disaster recovery or emergency response, the City will implement HUD waiver guidance pertaining to public notices, public review periods and public hearings in order to expeditiously deploy critical response funds. For example, Disaster Recovery will have a 5-day Public Review period.

*** According to 2014 HUD CPD technical assistance received by the City, the 15-day advance notice for hearings is set out as a best practice by HUD, but is not required by regulation. The intent is to solicit maximum citizen awareness and participation, as outlined in the remainder of the paragraph.**

Additional Guidelines and Information for HUD's Five Planning and Reporting Activities

At a minimum, the City will follow standards outlined under General Guidelines and Standards for Public Participation.

Consolidated Plan (Five-Year Strategic Plan)

In order to receive an annual allocation of federal funds from the Department of Housing and Urban Development (HUD), the City must submit a Consolidated Plan, which serves as the City's strategic plan for use of CDBG and HOME funds for five years, outlining goals to be achieved with the federal funds received.

To develop the Consolidated Plan, the City may use a combination of consultant services, consultations with other agencies, and various public engagement methods, such as public hearings, written comments, surveys/questionnaires, focus groups, and interviews. Additionally, the City will coordinate its Plan with Housing Catalyst (Fort Collins' Housing Authority) for its Public Housing requirements, the Northern Colorado Continuum of Care for data on persons experiencing homelessness and homelessness strategies, adjacent local governments for non-housing community development needs, and agencies with metropolitan-wide planning responsibilities.

Annual Action Plan

To implement the City's five-year goals, an Annual Action Plan is submitted to HUD each year listing the location, cost, proposed outcomes, and ancillary information related to each project or program selected for funding. Federal regulations require these funds be targeted where they will provide the greatest benefit to residents designated to receive HUD assistance, primarily the City's low- and moderate-income residents.

Consolidated Annual Performance and Evaluation Report

An integral part of measuring the success of the City's HUD-funded activities is the publication of a Consolidated Annual Performance and Evaluation Report (CAPER). This report provides an objective assessment of the City's progress toward meeting the stated goals outlined in the Five-Year Strategic (Consolidated) Plan, as well as the corresponding Annual Action Plan being reported on.

Amendments

An amendment to an approved Plan or Report will occur when the City decides:

- to add or remove a priority, project or program
- to not to carry out a project or activity described in the Plan
- to carry out a project not previously described
- to substantially change the purpose, scope, and/or location of beneficiaries of a project.

Because of potential impact to residents being served by funding, Substantial Amendments will be subject to the same Guidelines and Standards for Public Participation as the other planning and reporting activities. With the exception of amendments due to receipt of disaster recovery or emergency response funds, Substantial Amendments will require adequate notice of a 30-day public review period, the public review period, and a public hearing. Approval by City Council and a City Council public hearing will also be required for Substantial Amendments to the Consolidated Plan (see **Attachment A**, Citizen Participation Matrix, Substantial Amendments).

Updates for the purposes of addressing administrative items such as contact name changes, will be considered as minor updates, not amendments.

Consolidated Plan Amendment Guidelines

Substantial Amendment

Substantial changes may include, but are not limited to:

- A Consolidated Plan might need to be amended due to significant changes in community needs, market conditions, funding sources, priority needs, target areas, or if there are errors in the original plan, including discrepancies with the actual allocation amounts received from HUD (greater than \$25,000). Essentially, any substantial change that requires updating the Plan's strategies and goals to accurately reflect the current situation may necessitate an amendment
- Establishment of a new Neighborhood Revitalization Strategy Area (NRSA).

Minor Amendment

- Updating narrative sections that do not impact priority needs, target areas, or any of the Plan's strategies or goals.
- Correcting an error in the allocation amounts received from HUD (less than \$25,000) without other substantial changes.

Annual Action Plan Amendment Guidelines

Substantial Amendment

Substantial changes may include, but are not limited to:

- Major project changes in service area; significant change to a new location; change of purpose, program beneficiaries, or national objective compliance.
- Changing the use of CDBG funds from one eligible activity to another.
- Changes from one activity to another, such as project cancellation and/or new project approval.
- Funding changes (+/-) greater than \$25,000.

Minor Amendment

- Amendments not considered substantial are small increases or decreases in the amount of funds allocated to an approved project or activity in order to achieve the original purpose of the project or activity. These minor changes may be carried out at the discretion of the department and are not subject to the criteria that apply to

Substantial Amendments. Accordingly, there is no specific citizen participation process outlined for this activity.

CAPER Amendment Guidelines

Substantial Amendment

Substantial changes may include, but are not limited to:

- Significant changes to project details, incorrect data initially submitted, updates to program goals or activities, changes in funding levels, new project additions, or if there were revisions to the underlying Consolidated Plan or Annual Action Plan that need to be reflected in the performance report.
- Updating grant funds expended if a difference of \$10,000 or more exists.

Minor Amendment

- Updating numbers of beneficiaries.
- Updating grant funds expended if a difference of \$10,000 or less exists.

Citizen Participation Plan Amendment Guidelines

Due to a variety of circumstances and timelines under which such an amendment might occur, should there be a need for an amendment to the Citizen Participation Plan, departmental staff will determine the appropriate public participation process. An amendment will occur if there is direction from HUD that changes or updates to the process are necessary, such as a change in the length of time allowed for notices or public comment periods. Citizen Participation Plan updates for the purposes of addressing administrative items such as contact name changes, will be considered as minor updates, not amendments.

Substantial Amendment

Substantial changes may include, but are not limited to:

- Significant changes in the methods used for public participation for any Plan approved by City Council, including public hearings, public review periods, and public notices.

Minor Amendment

Minor amendments will include any updates required by HUD for receipt of funds, including but not limited to disaster recovery or emergency response funds.

Other Guidelines and Information

Interdepartmental Coordination and Cooperation

The Social Sustainability Department will work with the Communications and Public Involvement Office (CPIO), any communications employees assigned to the Social Sustainability Department, employees of the Finance Department who are responsible for overall grants compliance administration, and employees of the City Manager's Office responsible for Title VI compliance.

Document Retention

All Plans, Amendments, Reports, and activity files are public documents and are available both in paper copy and electronically from the City of Fort Collins. All documents are retained for a minimum of five years and are available for review with sufficient notice (usually 48 hours). To maintain confidentiality, the City will take all necessary measures to ensure any sensitive beneficiary information contained within the department's files is compliant with federal, state, and local privacy requirements.

Technical Assistance

Upon request, Social Sustainability Department staff will provide technical assistance to any group representing persons of low- and moderate-income interested in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. The department may determine, at its discretion, the level and type of assistance following consultation with those requesting technical assistance.

Complaint Procedures

Response Standards for Citizen Complaints

Substance and Timeliness

Should a resident have concerns/complaints related to the Plans, Amendments, and/or Reports, or any other federal program document or procedure, the concerns may be submitted in writing. The City will provide a timely, substantive written response to every complaint within 15 business days, as required by federal regulation.

Inclusion in Documents/Plans

Complaints received during any of the five reporting and planning activity processes, and the outcome of their consideration by the City, will be included in the corresponding adopted Consolidated Plan or Annual Action Plan submitted to HUD.

Excluded Comments

City staff shall notate citizen comments excluded from any document, the general nature of the comment, and the reason for exclusion.

Complaint and Response Process

Level One

The response to the complaint will be handled by the **Project Manager** assigned to the Plan or activity, or by a Social Sustainability employee designated by the Department Director. When a Project Manager or other contact information is not expressly provided, written complaints may be submitted to:

Address: Social Sustainability
 City of Fort Collins

222 Laporte Ave.
P. O. Box 580
Fort Collins CO 80522-0580
Phone: 970-221-6734

Level Two:

If not resolved by the Department, formal complaints should be addressed to the **City Manager** and submitted to:

Address: City Manager's Office,
City Hall,
300 Laporte Ave.,
Fort Collins, CO 80521

The City Manager will refer the complaint to appropriate City staff for a written response regarding the complaint within 15 business days upon receipt of the complaint.

Level Three:

If the complainant is not satisfied with the City Manager's response, further appeals should be addressed to the **Fort Collins City Council**, c/o the Mayor (City Hall, 300 W. Laporte Ave., Fort Collins, CO 80521). The Council has 30 days in which to take further action as deemed necessary to address the complainant's concerns.

Level Four:

If the complainant has not been satisfied with the response of City Council, a formal complaint may then be addressed directly to the regional Department of Housing and Urban Development (HUD) at: **Department of Housing & Urban Development**, 1670 Broadway, Denver, CO 80202-4801.

Funding Application Complaints

Formal complaints regarding HUD's approval of the City of Fort Collins' application for CDBG and/or HOME funding should be submitted in writing to the HUD Area Office within 30 days of the publication of the application notice. In order to ensure submitted objections are considered during the review process, HUD will not approve an application until at least 45 days after receipt of an application. In the interest of time, therefore, if the complainant is not satisfied with the response from the City staff and wants their comments to be considered during the HUD review process of the City's CDBG/HOME funding application, they should contact HUD directly within the designated time frame. **Department of Housing & Urban Development**, 1670 Broadway, Denver, CO 80202-4801. Phone:

Discrimination Complaints

When the complainant's concern is of a discrimination-related nature (e.g., discrimination on the basis of disability; race; creed; color; sex; sexual orientation; gender identity; gender expression; marital status; familial status; religion; national origin; and/or ancestry; source of income; veteran or military status; or other legally protected classes), the complainant should immediately contact one of the following resources:

- 1) City Manager's Office: Civil Rights/ADA Officer
300 Laporte Ave., Fort Collins, CO 80521
Phone: 970-416-2253
- 2) City of Fort Collins: Title VI Coordinator
Email: titlesix@fcgov.com
Phone: 970.416.4254.
- 3) The Colorado Civil Rights Commission/Division
General Inquiries: DORA_CCRD@State.co.us
Intake Unit: DORA_CCRDIntake@State.co.us
Phone: 303-894-2997
The Colorado Civil Rights Division website, <https://ccrd.colorado.gov/> provides information about the Division, the Civil Rights Commission, discrimination, and the process for filing a complaint.
- 4) The HUD Fair Housing Hotline (discrimination in housing-related issues)
Phone: 800-669-9777

Conclusion

The City of Fort Collins has a commitment to fostering public participation within the broadest spectrum of community members. This Plan is intended to reflect not only adherence to federal requirements, but also standards for meaningful communications excellence. As future strategies for community engagement emerge, develop, and are proven effective, they will be incorporated into Amendments to this Plan.

Attachment A

Citizen Participation Matrix

Document	Public Participation: <u>Minimum</u> Standards	Required Time for Public Review	Required Approval	Deadline
Citizen Participation Plan and Substantial Amendments	<ul style="list-style-type: none"> • 1-day prior notice of Public Review Period • 15-day notice of Public Hearing • New Citizen Participation Plan Public Hearing: City Council • Substantial Amendment Public Hearing: Social Sustainability Department 	30-day Public Review Period	City Council Approval	<ul style="list-style-type: none"> • Amended as needed • Most current update included with Consolidated Plan
Consolidated Plan and/or Annual Action Plans	<ul style="list-style-type: none"> • 1-day prior notice of Public Review Period • 15-day prior notice of Public Hearing • Consolidated Plan Public Hearing: City Council • Annual Action Plan Public Hearing: Social Sustainability Department 	30-day Public Review period	Consolidated Plan: City Council Approval Annual Action Plan: n/a*	Submit to HUD August 15 (45 days prior to start of new Program Year)
Consolidated Plan Substantial Amendments	<ul style="list-style-type: none"> • 1-day prior notice of Public Review Period • 15-day prior notice of Public Hearing • Public Hearing: City Council 	30-day Public Review period	City Council Approval	Submit to HUD after City Council approval
Annual Action Plan Substantial Amendments	<ul style="list-style-type: none"> • 1-day prior notice of Public Review Period • 15-day prior notice of Public Hearing • Public Hearing: Social Sustainability Department 	30-day Public Review period DR-funds: 5-day Public Review period	Annual Action Plan: n/a*	Submit prior to start of next Program Year
Consolidated Annual Performance and Evaluation Report (CAPER)	1-day prior notice of Public Review Period	15-day Public Review period	n/a	Submit to HUD December 31
Public Hearing Notices	Posting standards and implementation reflect a goal of maximizing citizen awareness and participation in Public Hearings**	n/a	n/a	Goal of 15 days, not less than 7 days before Hearing
Additional Public Hearings	Two general Public Hearings are required annually:			

	<ul style="list-style-type: none"> • One Public Hearing is to solicit citizen viewpoints and comments on how funds for affordable housing, community development programs and projects, and other funding-eligible activities should be spent. • One Public Hearing is to solicit citizen viewpoints and comments, and to also report to the community on how funds were spent during the City's previous Program Year.
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* Funding recommendations are subject to the 30-day Public Review period prior to final City Council approval, but the document content is not approved by Council prior to submission to HUD. As indicated, the Annual Action Plan document is also subject to a 30-day public review period, which may run concurrent with the Public Review period for funding recommendations.

** According to 2014 HUD CPD technical assistance, there is no regulatory time frame for notice postings prior to a Public Hearing. However, HUD's suggested guideline is 15 days prior to any Hearing.

Attachment B

Definitions

Annual Action Plan (AAP). The Annual Action Plan, required annually by HUD, details the expenditure of yearly CDBG and HOME grants and ensures funds are directed towards activities addressed in the Consolidated Plan. HUD requires the City to maintain a significant correlation between the goals identified in the Consolidated Plan and use of federal funds. Currently, the Human Services and Housing Funding Board evaluates and recommends activities to City Council. However, the City Council has the right to approve activities outside the recommendations of the Board. The Annual Action Plan is due to HUD on August 15, forty-five (45) days before the start of the City's new federal program year on October 1.

Area Median Income (AMI). This household income measurement is used by Fort Collins and some federal agencies, such as HUD, instead of the Federal Poverty Level because the measurement is community-based, and assesses a household's income in the context of other households in a geographic area.

Consolidated Annual Performance and Evaluation Report (CAPER). This report is a self-assessment of the implementation of the Consolidated Plan and the Annual Action Plan. Activity outcomes are reported, showing the effectiveness of the federal funds. This report includes details of the number and demographics of the community served. The CAPER is due to HUD by December 31, 90 days from the end of the City's federal program year.

Consolidated Plan (five-year strategic plan). As an Entitlement Community recipient of Community Development Block Grant (CDBG) funding and a Participating Jurisdiction in the HOME Investment Partnership Program (HOME) funding, the City is required by HUD to develop a Consolidated Plan that evaluates the needs of its low- and moderate-income residents. This includes a review of the City's housing, homeless, and community development needs; provides a housing market analysis; and creates a strategy to address the needs identified. This plan is revised every five years. The current Consolidated Plan cycle is: 2025-2029 (October 1, 2025 through September 30, 2030).

Low-Income Neighborhood. A low-income neighborhood is a predominantly low-income neighborhood identified as such by Census Tract, because 50% or more of the residents in that tract have incomes below 60% of the Area Median Income (AMI), an income measurement used by HUD. In Fort Collins, Qualified Census Tracts are located in and around Colorado State University, including areas where students typically live, areas north of College Ave. and west of Drake Rd., in the northernmost quadrant of the city and into unincorporated areas, and along the Mulberry corridor (also including unincorporated areas) (as of 2020 Census).

Predominantly Low- and Moderate-Income Neighborhood. A predominantly low- and moderate-income neighborhood is identified as such by Census Tract, because 50% or more of the residents in that tract have incomes below 80% of the Area Median Income (AMI), an income measurement used by HUD.

Attachment C

Anti-Displacement Policy

As part of the Citizen Participation Plan, the City must include its plan to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance. The City has in effect and is following the Residential Anti-Displacement and Relocation Assistance Plan as described below which will minimize displacement of any person as a result of a federally-assisted activity.

All occupied and vacant occupiable lower-income dwelling units that are either demolished or converted to a use other than providing low-income dwelling units, in connection with a federally-assisted activity, must be replaced with comparable lower-income dwelling units. Replacement of lower-income dwelling units may be provided by any government agency or private developer and must meet the following requirements:

1. The units must be located within the recipient's jurisdiction.
2. The units must be sufficient in number and size to house no fewer than the number of occupants previously housed in the units that were demolished or converted.
3. The units must be provided in standard condition.
4. All replacement housing will be provided during the period beginning one year before submission of the information required by this Plan and ending three years after the commencement of the demolition or conversion.
5. The units must remain lower-income units for 10 years from the date of initial occupancy.

Before work shall commence, the recipient must make public and submit in writing to the HUD field office the following information: a description of the proposed federally-assisted activity, the location on a map and the number of dwelling units by size, the time schedule for the commencement and completion of the demolition or conversion, the location and number of dwelling units by size that will be provided as replacement units, the source of funding and time schedule for the provision of replacement dwelling units, the basis for concluding that each replacement dwelling unit will remain a lower-income dwelling unit for at least 10 years from the date of initial occupancy, and information demonstrating that any proposed replacement of dwelling units with smaller dwelling units is consistent with the needs assessment contained in its HUD-approved Consolidated Plan.

Replacement is not required if the HUD field office determines there is an adequate supply of vacant lower-income dwelling units in standard condition available on a nondiscriminatory basis within the area.

In addition, the displaced person will be advised of his or her rights under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). Each person will be provided relocation assistance, at levels described in 49 CFR Part 24. This includes:

- Relocation Advisory Services
- Moving Cost Assistance
- The cost of a security deposit and credit check required for the replacement unit.
- Any actual out-of-pocket costs including moving expenses, if required to temporarily relocate.
- Displaced persons are eligible for a replacement housing payment to rent or buy a replacement home. The payment is based on several factors including: (1) the monthly rent and cost of utility services for a comparable replacement dwelling, (2) the monthly rent and cost of utility services for your present home, and (3) for low-income persons, 30 percent of your average monthly gross household income. This payment is calculated on the difference in the old and new housing costs for a one-month period and multiplied by 42.

A person who disagrees with the determination concerning whether the person qualifies as a displaced person or with the amount of relocation assistance for which the person is eligible may file a written appeal of that determination. A person who is dissatisfied with the determination on his or her appeal may submit a written request for review of that determination to the HUD field office for the applicable region. If the full relief is not granted, the person shall be advised of his or her right to seek judicial review.