

Citizen Participation Plan

Citizen Participation Plan. The City and County of Denver believes that safe and supportive neighborhoods strengthen families. The City's Citizen Participation Plan is based on the view that residents play an important role in improving the quality of life in their neighborhoods and, therefore, encourages residents to become involved in the Consolidated Plan process. When people become involved in their neighborhood and the Consolidated Plan process, they become an important force to improving neighborhoods.

The Citizen Participation Plan is also intended to fill a requirement by the U.S. Department of Housing and Urban Development (HUD), which sets forth the City's policies and procedures for public involvement in the Consolidated Plan process and the use of the:

- Community Development Block Grant (CDBG),
- HOME Investment Partnerships Program (HOME),
- Emergency Solutions Grant (ESG), and
- Housing Opportunities for Persons With AIDS (HOPWA).

To receive these federal grant monies, HUD requires jurisdictions to submit a Consolidated Plan every three to five years. The City's current Consolidated Plan covers a five-year time-frame from January 1, 2019 through December 31, 2023. The City's Consolidated Plan is a comprehensive strategic plan for housing and neighborhood development activities. The purpose of programs and activities covered by the Consolidated Plan is to improve the Denver community by providing decent housing, a suitable living environment, and growing economic opportunities, especially for low- to moderate-income residents.

Purpose of the Citizen Participation Plan. The Citizen Participation Plan (CPP) describes the process the City uses to collect public input and involve the public in development of the Five-Year Consolidated Plan. The CPP also addresses how the City obtains public comment on its Annual Action Plan and Consolidated Annual Performance Evaluation Report (CAPER). This Citizen Participation Plan was developed in accordance with Sections 91.100 and 91.105 of HUD's Consolidated Plan regulations.

Coordination with Other Efforts. The City has been laying the foundation for the new Five-Year Consolidated Plan through development of several supporting efforts. The efforts most closely related to the Consolidated Plan include the Neighborhood Revitalizations Strategy, Denver's Road Home, Blueprint Denver, and the Denver Housing Plan.

Denver's approach to citizen participation is focused in neighborhoods with the greatest needs and is comprehensive and inclusive. Denver agrees with the concept of building and strengthening partnerships. The City collaborates on housing and neighborhood development programs with the Housing Authority of the City and County of Denver (DHA) and numerous other city agencies. Denver works in a collaborative partnership with service providers, other federal/state government agencies and the private sector on all community development programs. The City believes that good collaboration and coordination of programs, services and budgets will result in healthier communities.

Encouraging Citizen Participation The City recognizes the importance of public participation in both defining and understanding current housing and neighborhood development needs and prioritizing resources to address those needs. The City’s Citizen Participation Plan is designed to encourage citizens of Denver equal access to become involved each year.

Development of the Plans and Performance Report This document outlines how members of the Denver community may participate in the development and review of the City’s Five-Year Consolidated Plan; each annual Action Plan; each Annual Performance Report; and any substantial amendments to a Consolidated Plan and/or Action Plan. The City of Denver’s program/fiscal year begins January 1 and ends December 31. The City is responsible for implementing and reporting on the all aspects of the Consolidated Plan process.

The annual timeline to develop the Consolidated Plan and/or Action Plan and the CAPER schedule is highly dependent upon the federal government's budget cycle, and specifically the allocations to HUD as approved by the U.S. Congress and the President. The following schedule provides a sample timeline for development of the City's plans if Congress allocates a budget in September preceding the start of program year.

City and County of Denver Citizen Participation Plan Annual Schedule	
January	<ul style="list-style-type: none"> ▪ Begin annual Action Plan year ▪ Begin Consolidated Annual Performance and Evaluation Report (CAPER) process
February	<ul style="list-style-type: none"> ▪ At the end of month publish CAPER Public Notice of draft availability for public comment
March	<ul style="list-style-type: none"> ▪ Beginning to middle of month begin 15-day Public Comment period for CAPER ▪ CAPER submitted to HUD by March 31
May-June-July	<ul style="list-style-type: none"> ▪ Hold public meetings for Consolidated Plan and annual Action Plan ▪ Middle of July release Request for Funding (RFF) for annual contracts
August	<ul style="list-style-type: none"> ▪ Request For Funds (RFF) due, date to be determined ▪ Review funding requests
September	<ul style="list-style-type: none"> ▪ Publish Public Notice informing public the draft Consolidated Plan/annual Action Plan are available for public comment ▪ Contact all public meeting participants about the availability of the draft plan(s)
October	<ul style="list-style-type: none"> ▪ Begin 30-day Public Comment period for draft Consolidated Plan and draft annual Action Plan
November	<ul style="list-style-type: none"> ▪ Consolidated Plan and Action Plan submitted to HUD by November 15
December	<ul style="list-style-type: none"> ▪ End of annual Action Plan year

Annual Action Plan. Each year the City must submit an annual Action Plan to HUD, reporting on how that year's funding allocation for the HUD entitlement grants will be used to achieve the goals outlined in the Five-Year Consolidated Plan.

Citizen/agency input. City staff holds at least two public hearing to describe the City's proposed allocation of the program year's funding allocation. The hearing is a detailed description of the programs, agencies, organizations and respective funding proposed by the City.

Draft Action Plan. A reasonable written notice is given to announce to the public the availability of the draft Action Plan. Availability of the draft Plan is advertised through newspaper notification in an area newspaper, on the City's website, along with announcements throughout the City's social media platforms.

The draft Action Plan is available for 30-days to gather public comment on the proposed spending allocation.

Final Action Plan. City staff reviews and considers all written public comments. The final Action Plan that is submitted to HUD includes a section that summarizes all citizens' comments or views in addition to explanations of why any comments were not accepted.

Consolidated Annual Performance and Evaluation Report (CAPER). The City is required to submit by March 30 a CAPER to HUD that describes the City's progress in meeting the goals in the Consolidated Plan and Annual Action Plan. Prior to submitting the CAPER to HUD, the City makes available to interested parties the proposed CAPER for a comment period of no less than 15 days. The public is notified of the CAPER's availability through newspaper notification in an area newspaper. A reasonable notification is published to announce the beginning of the CAPER public comment period.

The City reviews and considers all public comments received in writing, or orally at public hearings, if any, in preparing the CAPER. The final CAPER submitted to HUD includes a summary of these comments or views.

Substantial Amendments to Consolidated Plan/Action Plan. Occasionally changes occur during the year to warrant an amendment to the Consolidated Plan and/or Action Plan.

Criteria. The criteria for whether to amend is referred by HUD as "Substantial Amendment Criteria." These Substantial Amendments apply only to changes in CDBG funding allocations. Changes in funding allocation for other HUD grant programs received by the City—HOME, ADDI, ESG, HOPWA—are not required to secure public review and comment. The City considers the following conditions to be Substantial Amendment Criteria needed to amend the Consolidated Plan and Action Plan and projected use of fund:

- A new program or project is proposed for funding that was not previously identified in the Consolidated Plan and Action Plans;
- A program that was listed in the Consolidated Plan or Action Plan is eliminated during the program year; and

- The City increases/decreases funding for a listed project or program area by more than 50 percent.

Procedure. In the event of a substantial amendment citizens will be notified of the substantial amendment's availability through newspaper notification of the 30-day public comment period. The notification will appear in an area newspaper. The notice of the substantial amendment will summarize the programs involved and the nature of the substantial amendment to be implemented. The notice will identify where the complete substantial amendment(s) can be viewed and will advise the citizens that there will be a 30-day public comment period.

All comments received in writing or orally at the public hearing, if any, will be considered, and if deemed appropriate, the City shall modify the amendment(s). A summary of these, and a summary of any comments not accepted and the reason therefore, shall be attached to the substantial amendment(s) of the Consolidated Plan and/or Action Plan.

Amendments to Citizen Participation Plan. In the event that changes to this Citizen Participation Plan are necessary, City staff shall draft them. After reasonable notice, the amendment(s) will be available to the public for 15-days for written comment. All comments received in writing will be considered, and if deemed appropriate, City staff shall modify the amendment(s).

General Requirements:

Public Hearings/Meetings. The City's citizen participation plan encourages the inclusion of all City residents during the Consolidated Plan and annual Action Plan development process, especially low- to moderate-income residents who are the primary clients for HUD programs. There are many opportunities for public involvement through meetings, workshops and hearings.

At least two public hearings are held each year to obtain views of citizens, public agencies, and other interested parties on housing and community development needs, development of proposed activities, and review of program performance. The public hearings are conducted at a minimum of two different stages of the program year. The City and County of Denver staff holds at least one of these hearings before the proposed Consolidated Plan is published for public comment.

In addition to the required public hearings, the City may use alternative methods to encourage citizen participation. Public meetings, surveys, stakeholder group meetings, open houses, and workshops may be used to solicit citizen input.

City staff holds special public meetings in the target neighborhoods as identified in the Consolidated Plan and Action Plans. These meetings focus on topics of special interest to the neighborhood, the general public or the agency, and are held in effort to obtain feedback about ideas prior to the publication of plans or documents. The City continues to work regularly and informally with the nonprofit

organizations, services providers, businesses and other groups, and individuals to make sure there is on-going communication. Neighborhoods in target neighborhoods are the primary beneficiary.

Hearings/meetings require at least two weeks notification. Public hearing/meeting notifications are placed in local neighborhood newspapers, newsletters, flyers or a combination. Notification is also provided on the City's web page (www.denvergov.org/economicdevelopment). As mailing lists are established, they are used to provide direct notification through the mail and email. The City also consults and coordinates with the Denver Housing Authority during the development of the Consolidated Plan and annual Action Plan.

Notification of Participation Activities:

Required: Public Notices for Community Meetings and Public Hearings shall be published on the City's official website: www.denvergov.org/economicdevelopment In addition, the City will send a press release. Public Notices shall be published for not less than two weeks (14 days) prior to any meeting/hearing. (Other notice periods are specified as required by the particular grant program). In addition, a press release will be sent with a distribution list of all current, previous contacts. Flyers will also be distributed to current contractors to share with the public.

Location. Public hearings/meetings will be conveniently timed and located so as to ensure the maximum participation by people who might or will benefit from program funds. All public hearings are held at locations accessible to people with disabilities. Translation for non-English speaking residents and/or those who are hearing impaired will be provided when requests are made at least five business days' prior to a hearing.

Document access. City staff publishes the Consolidated Plan/Action Plan summary of priority programs and preliminary budget, the availability of the CAPER and announces substantial amendment(s) on the City's website www.denvergov.org/economicdevelopment and sends a press release to notify citizens, service providers and nonprofit organizations of the availability of documents. A reasonable notice of their availability is provided.

The notification also encourages the public to review and comment on the draft Consolidated Plan/Action Plan during the 30-day public comment period, the draft CAPER during the 15-day comment period and the substantial amendment(s) during the 30-day comment period.

Upon request, the Consolidated Plan, Action Plan, CAPER and substantial amendment(s) documents are made available at the main public library, the Denver Housing Authority Administration Building, Denver Human Services, and are always available on the City's web page (www.denvergov.org/economicdevelopment). Upon request, these documents are also provided in a form accessible to persons with disabilities. Citizens, groups, and other interested organizations may obtain hard copies of the plans, performance report and/or amendment(s) by calling (720) 913-1999. The copies are free of charge and limited to one per individual or business.

Denver notifies adjacent jurisdictions about priority non-housing community development needs and will continue to work with the metro area on homeless issues and HIV/AIDS issues and solutions.

Access to information/records. The City provides reasonable and timely access for citizens, public agencies, and other organizations to access information and records relating to the City's Consolidated Plan, annual Action Plan, performance reports, substantial amendment(s), Citizen Participation Plan, and the City's use of assistance under the programs covered by the plan during the preceding five years.

The City and County of Denver's web page is www.denvergov.org/economicdevelopment for citizens interested in obtaining more information about city services and programs or to review the plans and performance reports.

Disaster or Declaration of Emergency. In the event of a disaster or a declaration of emergency, public participation activities may be altered at the direction of HUD in order to expedite grantee response to affected communities.

Additionally, public participation activities will be facilitated by the most feasible means available at the time (i.e. call-in or virtual meetings in lieu of public meetings). Information to those with vision and hearing impairments, as well as non-English speakers will be provided to the extent feasible.

In reference to COVID-19. At the time of writing the World Health Organization has declared the coronavirus outbreak a pandemic and the United States has declared the outbreak a national emergency. Similarly, states and local jurisdictions, including the City and County of Denver, have declared local states of emergency effectively shutting down large gatherings and limiting the movement of residents.

HUD recognizes the efforts to contain COVID-19 require limiting public gatherings, such as those often used to obtain citizen participation, and that there is a need to respond quickly to the growing spread and effects of COVID-19. Therefore, HUD has waived 24 CFR 91.105(c)(2) and (k) and 24 CFR 91.401 to allow Denver to determine what constitutes reasonable notice and opportunity to comment given the circumstances related to COVID-19. Denver may use alternative methods for public participation and will allow for reasonable notification and access for citizens.

Therefore, for the 2020 Action Plan, amended 2019-2023 Consolidated Plan, 2019 CAPER, and the Citizen Participation Plan, the minimum required public comment periods are waived, provided that no less than 5 days are provided for public comments. These comment periods may run concurrently with each other. Reasonable notice of the comment periods will be provided, and Denver will replace the public meetings with a public presentation available online at www.denvergov.org/economicdevelopment; the presentation is available in English and Spanish, and the slides and transcript are available separately in English and Spanish as well.

Optional City communications. Notification on the City's Cable Television station's "Bulletin Board" and/or "Cable Television" (Channel 8) which reaches approximately 25,000 households (62% of the Westminster households).

The City reserves the right to adjust optional methods of notification depending upon which methods have proven to be the most cost effective in reaching the widest number of citizens, particularly low to moderate income residents.

Comments/complaints. The public may provide comments and complaints related to any HUD program. Written public comments and complaints can be mailed to 101 West Colfax Avenue, Denver, Colorado, 80202 or by email to rachel.king@denvergov.org. or sent by fax at (720) 913-1800.

Written complaints must clearly state the complainant's name, address, and zip code. A daytime phone number or email should also be included in the event further information or clarification is needed. City staff will provide a timely, substantive written response to every written complaint, within 15 days of receipt.

Technical assistance. The City can provide technical assistance to groups representative of the target neighborhoods or other low-income areas that request such assistance for the preparation of funding proposals to the greatest extent possible. Technical assistance may consist of workshops, one-on-one assistance, or information and referral. When the City initiates a request for proposals, it provides a pre-application or bidders workshop to ensure all organizations are aware of the opportunities and limits of the funding source. The City's provision of technical assistance does not include the preparation of grant applications for individuals or organizations. The City's provision of technical assistance can be limited by funds and staff availability.

DHA Public Participation. DHA provides for public participation in the development of their agency annual plan process and five-year Capital Fund Program (CFP) process. The Agency Plan stipulates the mission, goals, objectives, and policies for DHA, any and all projected capital improvements, redevelopment, relocation, renovation, rehabilitation, modernization and management improvements for public housing developments. Examples of topics include: Admissions and Occupancy Terms, Section 8 Administrative Plan Annual Capital Fund Performance and Evaluation, and resident/public comment.

DHA, in conjunction with the Resident Council Capital Fund Committee, prioritizes capital improvement items primarily on statutory requirements as determined by HUD, health and safety of residents, infrastructure and related housing quality standards.

As such, DHA develops and solicits resident and management input into the capital needs of their respective public housing developments for development of its Capital Fund Plan and Annual Plan submission to HUD. The DHA Capital Fund Plan and Agency Annual Plan are a regular agenda item of DHA local resident councils (LRC) and the established Resident Council Board (RCB) Capital Fund Committee. Based on resident, management, LRC, and RCB input and contingent upon funding and within capital fund budget, DHA staff then incorporates recommendations within the Capital Fund Plan and Annual Plan.