



PERFORMANCE & PROGRAM EVALUATION



CITY REBATES / REDUCED-FEE PROGRAMS EVALUATION REPORT

February 2020

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**PERFORMANCE & PROGRAM
EVALUATION**



EVALUATION SUMMARY

Report Title: Evaluation of City Rebates and Reduced-Fee Programs for Low-Income Residents

Date: February 2020

Report Requested By: City Executive Leadership Team

Evaluation Conducted By: Katie Ricketts, Jo Cech

P&PE PROGRAM DESCRIPTION:

The Performance and Program Evaluation (P&PE) program was established by the City in 2017 as a new element in its continuous improvement strategy. P&PE provides an analysis of City programs/initiatives to assess if stated objectives have been met, and to suggest improvements to create more efficient and effective program and service delivery. The P&PE evaluators bring both private and public-sector evaluation experience to the City's P&PE program. Each evaluation conducted by the P&PE team (also known as the Evaluation Team) is structured to identify program improvements to provide the organization with recommendations to learn, develop and implement more efficient and productive programs.

SCOPE OF EVALUATION:

At the request of the Executive Leadership Team, the P&PE Evaluation Team pursues evaluations of specific programs, projects and policies in order to assess impact, gather learnings and facilitate opportunities for continuous improvement. As the City looks to strengthen its approach to serving low-income residents in the community, it was considered an appropriate time to review the objectives of current income-qualified programs, document the history and identify areas of opportunity and challenge within specific programs and policies.

The City Executive Leadership Team asked the Evaluation Team to:

- Provide a profile of the population(s) we reach currently.
 - Key questions: How are we reaching low-income populations through our City Rebates programs? How diverse (or similar) are the participants we reach across programs? Do the programs access the same pool of eligible residents? What are the learnings we should share across programs?
- Provide important information about the current state of programming and service provision.
 - Key questions: What does our current suite of programs accomplish? Do those outcomes meet City goals and objectives? What options may leadership want to consider and what are the related costs and benefits?
- Assess city-wide impact, opportunities and challenges
 - What are the opportunities for greater city-wide coordination of these programs? What are the tradeoffs for departments and residents?

The subset of low-income rebates and reduced-fee programming includes the following:

- **Finance Rebates** (grocery tax, utility sales tax, city-specific property tax (or rent tax reimbursement)).
- **Utilities Low-income Portfolio** (medical assistance program, income-qualified rate program, payment assistance fund for emergency assistance).
- **Recreation Reduced-Fee Program** (reduced-fee program for recreation courses and learning opportunities as well as facility use).

Evaluation Goal: Determine if the City's rebate/reduced-fee programs for low-income residents achieve City and community objectives, if they are efficient, and if they meet residents' needs.

APPROACH AND METHODS

A mixed method approach (process evaluation plus outcome evaluation) was selected by the Evaluation Team.

P&PE uses the McKinsey 7S model of organizational effectiveness in its evaluation process. The model, called the Seven S (7S), has seven components that explain how organizations or programs/projects perform their work. The seven components also help to identify strengths and weaknesses of organizations/programs/projects. When the seven components are aligned and effective it creates organizational congruency, which leads to desired organizational or program/project outcomes.

P&PE organizes its program evaluation findings and recommendations using the 7S model to ensure consistency and comparability across all program evaluations. The model's seven components are:

- **Shared Values:** the core values that are evidenced in the organization's culture, the norms and standards of the organization.
- **Strategy:** the plan to maintain and build world-class customer service and innovation.
- **Structure:** how the organization/program is structured, who reports to whom, who is accountable.
- **Systems:** the daily activities, procedures, tools and infrastructure used by staff to get the job done.
- **Style:** the leadership style adopted.
- **Staff:** the employee base and their general capabilities.
- **Skills:** the skills and competencies of the employees, their ability to do the work.

ACRONYMS AND TERMINOLOGY

ACRONYMS

ACS	American Community Survey
AMI	Area Median Income
BEA	Bureau of Economic Analysis
BIT	Behavioral Insights Team, a public policy consulting group
CFCU	City of Fort Collins Utilities
CoFC	City of Fort Collins
CRM	Customer Relationship Management software system
CSRs	Fort Collins Utilities Customer Service Representatives
CSU	Colorado State University
EOC	Energy Outreach Colorado, a state-wide energy assistance program
Evaluation Team	City of Fort Collins Performance and Program Evaluation Team
FPL	Federal Poverty Level
FSA	Financial Services Area
FTE	Full-time Employee Equivalent
GDP	Gross Domestic Product
GTR	Grocery Tax Rebate
HCD	Human Centered Design
HUD	United States Department of Housing and Urban Development
ID	Identification
IQAP	Utilities Income-Qualified Assistance Program
IQR	Utilities Income Qualified Rate
LEAP	Colorado State Low-income Energy Assistance Program
MAP	Utilities Medical Assistance Program
PAF	Utilities Payment Assistance Fund
P&PE	Performance and Program Evaluation program within the City of Fort Collins
PSD	Poudre School District
PTR	Property Tax Rebate
SUT	Financial Services, Sales and Use Tax Office
ToD	Utilities Time of Day pricing
UAP	Utility Assistance Program
UC Health	A Northern Colorado hospital system
UTR	Utility Tax Rebate

TERMINOLOGY

Great Recession: The Great Recession marks a period of general economic decline (recession) during the late 2000s and early 2010s. It was driven primarily by the collapse of the U.S. real-estate market and negatively affected global trade and fueled economic inequality in the U.S. and throughout the world.

Human Centered Design: Human Centered Design (HCD) is a process and approach for solving complex, social, environmental and economic problems by involving the human perspective in all steps of the problem-solving process. The process aims to make systems usable and useful by focusing first and foremost on the *users*, including their needs and requirements. Initial stages of HCD usually revolve around immersion, observation, and contextual framing whereby innovators immerse themselves with the problem as well as the affected community. Consequent stages focus on community brainstorming, modeling and prototyping and implementation in community spaces.

Income-qualified programs: Municipal (in this case) programs that are offered to residents based on their income level. Residents who apply must show proof of income and have income below the income threshold to participate in these programs.

Prime earning years: Prime earning years are generally thought to occur between one's late 30s to late 50s. Prime earning years differ for women versus men, whereby women's earnings start diverging sharply from men after age 34.

Rebates and reduced-fee programs: Throughout the report the terms 'rebate' and 'reduced-fees' are used generally and interchangeably. This includes referencing the UAP program, which does not technically issue a 'rebate' but assigns a new rate (IQAP, MAP), or a one-time payment (PAF) for qualifying utilities customers.

Customers: this report uses this term broadly to discuss the residents and businesses who are served by the City of Fort Collins government. In this report, this term is often used in context with low-income people who, as the report suggests, are unique consumers of government services.

REPORT OVERVIEW

Municipally managed income-qualified programs typically include workforce-related investments, public benefits like housing vouchers or funding for human services, and rebates and reduced-fees that reduce the cost of city living for economically vulnerable segments of the population. This evaluation has a narrow focus: evaluating the efficiency and effectiveness by assessing the structure, strategy and systematic functioning of City rebates and reduced-fee programs for the City of Fort Collins.

In contrast to other reports generated by the City's Evaluation Team, which have covered a single program, this evaluation covers seven individual rebate programs within three City

The report is broken up into two parts: Part 1, Individual Program findings and; Part 2, City-wide findings.

The Evaluation Team holds that the recommendations and findings in Part 2 are the highest priority.

service areas. Part 1 of this report evaluates individual programs within specific departments. Part 2 evaluates how individual programs work together as a portfolio of low-income programs across the city organization.

These two parts, however, are not exactly equal. Within this evaluation, the Evaluation Team holds that the recommendations and findings in Part 2 are the highest priority. The

Evaluation Team agrees that a centralized, city-wide approach could align individual programs, articulate larger, city-wide goals, offer a single point of entry for participants, and ultimately deliver exceptional customer service for low-income individuals and families.

To the extent that Part 2 recommendations-- like city-wide centralization of income-qualified programs—will take time and resources, the Evaluation Team identifies in Part 1 where immediate department-level changes can be made in the interim.

CITY MOTIVATION

The City's vision is to provide world-class municipal service and its mission is to provide exceptional service for an exceptional community, which includes the services and policies targeting resident customers who are low-income.

This report reviews the demographics and characteristics of this unique customer segment. Low income people in Fort Collins, like elsewhere, typically have shared needs but do not represent a fully homogenous group. In Fort Collins, certain demographic groups are disproportionately low-income, requiring different outreach, marketing and strategic efforts. In Fort Collins, this includes women, especially senior and adult women, in addition to people of color.

The demographics of low-income people may or may not be unique when compared to other communities, but better knowledge of this population and the unique demographics they embody offers an important opportunity for the City to better target, assess impact, and specifically design policies and programs for these users of government services.

City Vision: *To provide world-class municipal services through operational excellence and a culture of innovation.*

City Mission: *Exceptional service for an exceptional community.*

EVALUATION SCOPE & INCLUDED PROGRAMS

The City of Fort Collins provides a variety of rebates and reduced-fee programs to help residents meet their basic needs in energy, transportation and tax relief, and to promote access to a high quality of life through recreation, arts and culture.

A subset of the City's rebate/reduced-fee programs were included in this evaluation of the City's income-qualified programs. Though arts, culture and transportation programs were not included in this evaluation, the Evaluation Team believes the findings around how the evaluated programs are or are not working together to generate synergies, reduce transaction costs and improve community impact are generalizable and applicable city-wide.

The subset of low-income rebates and reduced-fee programs evaluated include the following:

- **Utilities Affordability Portfolio (UAP).** Includes the Medical Assistance Program (MAP), Income-Qualified Assistance Program (IQAP), and the Payment Assistance Fund (PAF) for emergency utility assistance.
- **Finance Rebates.** Includes the Grocery Tax Rebate (GTR), utility-related Sales Tax Rebate (STR), City-specific Property Tax (or rent-tax) Rebate (PTR).
- **Recreation Reduced-Fee Program.** Reduced-fee program for recreation courses and facility use.

Rebate and reduced-fee programs are policy tools local governments use to lower the high cost of city living for low-income people.

This report evaluates a selection of City reduced-fee and rebate programs to determine if these programs are positioned to achieve the intended objectives.

Key areas of inquiry in this report include the profile of the populations in need and the current reach of the City's various programs in terms of size, demographic characterization and low-income customer satisfaction with the provided services. The history, goals and objectives and operations of the rebate and reduced-fee programs evaluated have each been documented along with key recommendations for individual program improvement. The final chapter of this report concludes with findings for better cross-program integration.

In Figure 1, how the evaluated programs (rightmost, red boxes) fit into a larger picture of income-eligible City programs is illustrated:

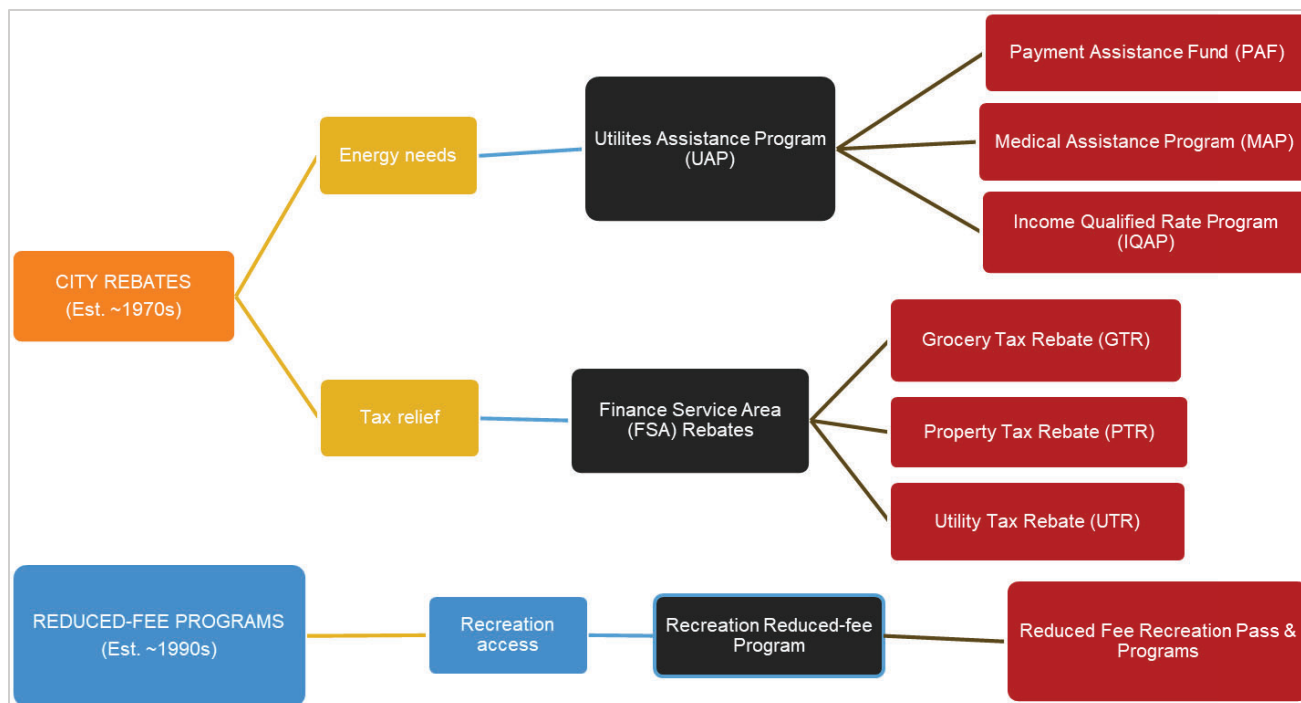


Figure 1: List of income-qualified programming evaluated by the P&PE Team

POVERTY IN FORT COLLINS LOOKS LIKE TODAY

Economic statistics, including those focused on identifying low-income or impoverished groups, are gathered at different dimensions. These dimensions include individuals, families (2+ people who are related, living together and presumably sharing finances) and households (people who live together but may or may not be related, and may or may not be sharing finances).

Across all subsets of the population, the individual poverty rate in Fort Collins, according to the American Community Survey (ACS) administered by the Census Bureau, is 17%. When controlling for a high local student population¹, **this report finds an average overall poverty rate of 12.2% of individuals.**

While some characteristics of individuals and families facing high poverty levels are well-known, others remain hidden and are specific to particular regions and unique economic realities. Like

What characteristics make someone more likely to be poor in Fort Collins? Being Black, Hispanic/Latinx, and female. Women are 10% more likely than men to experience poverty.

How many people in Fort Collins are poor?

- ***~2,000 families*** are poor. Families are household units of 2+ people, related by blood or marriage.
 - ***~7,000-10,000 households*** are poor. Households are home units made of people who may be related or not.
 - ***~25,000 individuals*** are poor. This number is based on a total population of 171,100 people.
-

¹ “Controlling” for students means accounting for the fact that our local student population has an outsized effect on the outcome of interest, in this case, poverty. Many students are stepping out of the economy and forgoing current wages in lieu of investing in their education in the hopes of future, higher earnings. By identifying and then isolating—as much as possible—students from the underlying population, we can see what poverty looks like in addition to, or outside of, students.

elsewhere in the country, race in Fort Collins plays an important role in elevating an individual's or family's risk of poverty. In Northern Colorado, **Native Americans, Blacks and Hispanic/Latinx people have lower incomes, higher poverty rates**, fewer assets, lower educational attainment levels, lower homeownership rates and poorer health outcomes than the majority white population². In Fort Collins, the median household income for non-white racial groups is approximately \$42,333 lower than white households' median income³.

Age and gender also both play important roles in increasing poverty risk. At first glance, a high population of students indicates that the majority of the poor in Fort Collins (around 30% of the poverty population) are students between the ages of 18-24. When you control for the student population, however, a different picture of poverty emerges in Fort Collins. **Women ages 35-54 and those 55+ are disproportionately poor**: over the last five years and compared to their male counterparts, these women are 10% more likely to face poverty.

Key Facts About Poverty in Fort Collins (ACS Census Data, 5-year 2013-2017 estimates):

- **One in eight** (12.2%, 20,948) individuals out of a total population of 171,100 is considered low-income.
 - **One in sixteen** (6.4%, 2,146) families are low-income, out of a family population of 33,531. Families are distinct from households (61,532) in that the families are a distinct type of household unit of more than one individual, living together and related by marriage, birth or adoption.
 - **Poverty in Fort Collins is characterized by gender.** Women are 10% more likely—at any age—to be impoverished than men. 26% of households headed by females are low-income.
 - **Poverty in Fort Collins is characterized by race.** Latinx, Black and Native American people experience an elevated poverty risks.
 - ACS data supports, and community nonprofits agree, that **a higher proportion of the poor in Fort Collins today are 'working poor,'** earning insufficient wages to keep them and their families out of poverty.
-

² Bell Policy Center, (2018). Guide to Economic Mobility in Colorado. <https://www.bellpolicy.org/wp-content/uploads/2018/01/Guide-to-Economic-Mobility-FINAL.pdf>

³ City Plan Fort Collins, 2019. <https://ourcity.fcgov.com/cityplan/documents> (p.22-23).



EXECUTIVE SUMMARY (PARTS 1 & 2)

*This evaluation is broken up into two parts, each with distinct findings. These include: **Part 1: Department-level findings and recommendations** relevant for specific, individual programs operating within the city. **Part 2: Cross-city findings and recommendations** for the combined portfolio of low-income programs enacted here at the City of Fort Collins.*

EXECUTIVE SUMMARY PART 1: INDIVIDUAL REBATE/REDUCED-FEE PROGRAMS

UTILITIES AFFORDABILITY PORTFOLIO (UAP): FINDINGS AND RECOMMENDATIONS

UAP KEY FINDINGS

Utilities has gained significant outreach and operational synergies by aligning with the state-wide Low-income Energy Assistance Program (LEAP).

- In its first year, the City of Fort Collins Utility (CFCU) Income-Qualified Assistance Program (IQAP) has enrolled close to 60% of the qualified LEAP participants who obtain CFCU services and live in Fort Collins.
- For each low-income subset, including the chronically poor, the temporarily or suddenly poor, and individuals and families managing disabilities or medical issues, there is a uniquely suited UAP program.
- UAP tracks outreach efforts and collaborates closely with community and regional partners. Out of City's three rebate and reduced-fee programs evaluated, the UAP program is most well-known among non-profit partners.
- Operational and strategic goals are lacking.
- The program enjoys strong support and community awareness, and program staff are highly respected among stakeholders.

SUMMARY & RECOMMENDATIONS

As the pilot year of IQAP ends, an upcoming review with a year's worth of data will tell a lot about how the program is functioning, who is benefitting, and where improvements may be made. Even without a complete dataset, several recommendations are outlined in this report (see the adjacent table). The recommendations include structural changes, like the elimination of the MAP program, strategic changes like the identification of goals and objectives beyond simply administering the program, and systematic improvements like an improved customer feedback survey. Assessing how many MAP customers would not qualify for IQAP should be undertaken before elimination of the MAP program. However, even if 50% didn't qualify (~80 current MAP participants), the pool is small enough for CFCU to consider 'grandfathering' any unqualified individuals into the IQAP program.

Importantly, the program management staff running the UAP program enjoy strong community collaboration and are very much admired and respected for their hard work in the community. While they may improve by standardizing and strengthening a customer feedback survey, the UAP team benefits from a department-wide system (CFCU Customer Connections) to track outreach efforts. This department infrastructure enables the team to use historical data to identify what they have done (benchmarking) and what they can do to improve (goalsetting). A 2020 outreach action plan is currently being developed. A summary of recommendations can be found in the adjacent table.

Component⁴	Recommendation	Recommendation rationale
Structure	(1) Merge MAP with IQAP and remove duplication.	MAP is a small program that requires significant staff management. Alongside the IQAP, MAP is redundant as most users of MAP may be rolled into the IQAP.
Strategy	(2) Develop a strategic plan to include the remaining ~30-40% who participate in LEAP but not IQAP. (3) Identify and document operational and strategic goals and objectives.	Continuing to support LEAP participation (and thus IQAP participation) with non-profit partners, events, etc. Beyond simply administering a program, identify long and short-term goals, create milestones and further develop a framework for assessing impact.
Systems	(4) Reduce re-work and redundancies in developing an IQAP master-list with LEAP. (5) Standardize a user survey to track customer satisfaction.	Work with local LEAP program officers to eliminate redundancies in identifying eligible participants. E.g., eliminate construction of three different lists between LEAP and the City for identifying potential program participants. Survey used to assess participant satisfaction may be improved to provide greater insights with better questions, survey participation incentives and improved survey design, for identifying what customers perceive as the value of IQAP.

⁴ The P&PE Team uses the McKinsey 7S framework for program evaluation. This includes assessments around Strategy, Structure, Shared Values and Systems, in addition to Style, Staff, and Skills. www.mckinsey.com

FINANCE SERVICE AREA (FSA) REBATES: FINDINGS AND RECOMMENDATIONS

FSA REBATE PROGRAM KEY FINDINGS

- The FSA Rebates program, including the utility-tax rebate (UTR), grocery tax rebate (GTR), and property-tax rebate (PTR) have not been evaluated since their origination almost 40 years ago.
- The administration of rebates in Financial Services Area (FSA) has never been fully and permanently resourced. This has had ramifications for Finance staff, who are temporarily diverted from their primary jobs, and the program itself, i.e., there is a lack of capacity for program improvement, strategic marketing efforts and community engagement.
- Starting in 2015, a seasonal, part-time full-time employee equivalent (FTE) was hired to manage applications during the three-month enrollment window.
- A seasonal FTE has little time to conduct outreach, develop community relationships, or work on long-term program development.
- In 2019, FSA was able to hire a new Sales Tax technician that will devote a proportion (33%) of time to year-round management of the FSA Rebate program.
- Compared to other evaluated City rebate programs, the Finance Rebates are relatively unknown to many community non-profit partners.
- A narrow focus on program administration and execution exists, absent a strategic plan.
- Declining program participation has occurred simultaneously with a growing pool of income-eligible households in Fort Collins.
- Compared to other City rebate programs, participants typically skew much older (mid 60s) and applicants come from smaller household sizes with extremely low-income levels. GTR applicants are an exception, with a median age of ~40, and 3+ in a household.
- Age-related eligibility requirements limit equitable access to the UTR and PTR. Evidence suggests there are a number of non-senior, impoverished families who may benefit from the rebates but do not meet the age requirements, i.e., are not age 65+.
- UTR and IQAP are duplicative. UTR was established pre-IQAP and is an artifact of an era where energy poverty was not addressed within Utilities. Verification of CFCU customer status for the UTR is time-consuming and burdensome for Finance staff to manage.

SUMMARY & RECOMMENDATIONS

The UTR, GTR and STR, which together make up the FSA Rebates program, have never been reviewed or evaluated—though various improvements to the original ordinances have occurred (e.g., the 1980s inclusion of ‘disabled individuals’ identified in the target group). With a new, partially dedicated FTE, the FSA Rebates program is likely to benefit from improved service continuity, better nonprofit relationship management, and possible strategic objective development. However, the ability for this new resource to reasonably manage any program growth—in addition to necessary (and growing) Sales and Use Tax duties—is unlikely. Strategic planning and clear goal definition will help deduce what is required for FSA Rebate program success in terms of staff time, roles and responsibilities.

Resourcing constraints:

The FSA took an important step towards better program management by addressing the service continuity and relationship management issues inherent with a seasonal employee.

Reducing age-specific criteria for the PTR could expand eligibility for the families already accessing the GTR, but unqualified for the PTR. The combination of the PTR + GTR may financially incentivize low-income residents to apply for the FSA Rebates, despite the work and coordination required (e.g., arranging

childcare, transportation, etc.) for these households to submit applications in-person to the City.

Combining the PTR with the GTR also achieves the following:

- **Reduces staff burden and operational costs.** Managing and monitoring divergent participation criteria for different Finance rebates is a 'heavy lift' for an already under-resourced program.
- **Ensures equity, targets the neediest.** When age-criteria were adopted for the PTR/UTR in the 1970s/1980s, it is probable seniors were a population with a high—perhaps the highest—likelihood of poverty. Today however, the most impoverished people in Fort Collins are women, including adult women between ages 35-54 and senior women over age 55 (see discussion on pages 14-17). Though seniors still represent a vulnerable population, Fort Collins today clearly has a high proportion of working families and adults in poverty. With stagnating usage of the PTR, extending PTR to the currently impoverished population makes sense to fully address the need of a changing low-income population.
- **More money into the hands of low-income people, especially families.** A female-headed household is more than 25% more likely to experience poverty with significant lifelong impacts for children. Research shows incremental household funds typically go to benefit children, and that interventions that benefit children have long-term positive effects on economies and societies.⁵

Eliminating the UTR has positive benefits for the City, the FSA, the IQAP program and low-income customers. Verifying CFCU customer status between CFCU and FSA is a lengthy and burdensome process for staff. Directing interested customers to the IQAP/LEAP program instead, could better utilize an existing City service and strengthen a state-wide program (i.e., LEAP). For low-income customers, attaining a long-term solution—a permanently lower utility rate—is almost certainly preferable to an annual cash rebate.

Eliminating the UTR could also reduce a portion of the administrative burden of the FSA Rebates program and free up time and resources for the important—but currently not completed—marketing and relationship-building work that needs to be undertaken for the GTR/PTR rebates.

FSA Rebate program staff should also consider how to identify and obtain resources for improving the online application system. Knowing that low-income families are constrained by transportation, childcare and other costs, an online application means that low-income people working multiple jobs and managing the high costs of city living are able to submit applications in a time and manner convenient for them. Additional recommendations are summarized in the adjacent table.

⁵ UNICEF (2019). https://www.unicef.org/socialpolicy/index_53294.html Accompanying report: https://www.unicef.org/socialpolicy/files/Investing_in_Children_19June2012_e-version_FINAL.pdf

RECREATION REDUCED-FEE PROGRAM: FINDINGS AND RECOMMENDATIONS

Component	Improvement & recommendation	Recommendation rationale
Structure	<ul style="list-style-type: none"> (1) Ensure adequate FTE coverage of the FSA rebate program. (2) Merge GTR and PTR into a single rebate by removing age-specific criteria of PTR. (3) Eliminate UTR in lieu of pushing participants towards CFCU IQAP program. 	<p>With a new 2019 FTE spending 33% of their time on the FSA Rebates program, FSA has made a solid step towards service continuity. However, should Council prioritize program growth, appropriate resourcing should be reconsidered.</p> <p>Merging the GTR and PTR streamlines and creates value in the following ways:</p> <ul style="list-style-type: none"> a. Reduces staff burden and operational costs. b. Ensures equity, targets the neediest. c. Puts more money into the hands of low-income families.
Strategy	<ul style="list-style-type: none"> (4) Identify and document goals and objectives of FSA Rebate program. (5) Standardize customer service feedback opportunities. (6) Increase marketing efforts via increased budget and/or staff time allocated to outreach. 	<p>Beyond simply administering a program, identify long and short-term goals, create milestones and further develop a framework for assessing impact.</p> <p>Adequate customer feedback is not currently obtained for assessing satisfaction and opportunities for design and process improvement.</p>
Systems	<ul style="list-style-type: none"> (7) Make application period year-round. (8) Provide resources to improve online application option. (9) Consider ways to eliminate income verification. 	<p>In contrast to other city rebate/reduced-fee programs, the FSA Rebate program still operates as a seasonal program, which is challenging for staff who work on a compressed schedule, as well as applicants who must juggle yet another benefit timeline.</p> <p>The current online application option has not been designed-for, nor tested by, actual users. It is difficult to use, challenging to upload the correct documents, and usually requires more work for staff to track down missing application components.</p> <p>Income verification is an extremely burdensome step for City staff. Staff time could be better spent on targeted marketing and customer engagement/support⁶.</p>

⁶ The UAP program eliminated income verification by accepting LEAP enrollment in lieu of UAP-specific program income verification.

RECREATION PROGRAM KEY FINDINGS

- Among the City Rebate programs evaluated in this report, the Recreation reduced-fee program has by far the most users (more than 5,000 annually). These are mostly families and most primary applicants who submit applications on behalf of a household, are female.
- In contrast to other departments, the Recreation reduced-fee program uses a unique poverty measurement threshold of 185% of the federal poverty threshold. This is in-line with Poudre School district, a key community partner for the program, but out of alignment with the other City Rebate programs.
- Following a year of community and municipal partner outreach, Recreation's Reduced-fee Program underwent a major overhaul in 2017. The changes in 2017 simplified the discounts given and prioritized access to introductory sports, group activities and classes.
- Changes are occurring in the user base: adults ages 19-59 are shrinking as a user base (down by more than 10% over the last 5 years), while a proportionally smaller senior segment (ages 60+) is growing.
- The income verification step has a significant privacy risk for applicants, is complicated, and is burdensome for staff, especially Recreation office front desk staff. The process for moving, copying and validating sensitive tax and identification documents within the Recreation department is not formalized or secure, providing opportunities for sensitive applicant information to be lost or misused.
- The program maintains a strong focus on operational improvement and operational goals. It lacks a focus on long-term strategy and strategic goals.

SUMMARY & RECOMMENDATIONS

The Recreation reduced-fee program has been successfully integrated into all Recreation department functions and there is significant program support and familiarity within the community and among community partners. Compared to other evaluated City rebate programs, the reduced-fee program serves many low-income people—especially families-- each year. The program has taken significant steps to improve the application process and offers access to recreation opportunities for a range of individuals and families that live in Fort Collins.

Importantly, the application itself has just benefitted from a FC Lean intervention, which reduced the application from five pages to one. The application now is simpler to understand, completion is expedited, and design factors that are known to be of great importance for low-income customers are incorporated.

Broadly, the Recreation Department's program would benefit from balancing a strong focus on operational improvement with a focus on long-term strategic impact. In other words, what does Recreation seek to accomplish in the long term with the reduced-fee program? Are short-term operational changes working in tandem with a larger vision and articulated long-term strategic goals? As of now, long-term strategy to guide operational action is missing.

Part of the imbalance between strategic and operational goals is the fact that the reduced-fee program is not thought of as a traditional Recreation program, with a dedicated program manager, a specific communications plan, etc. Rather, the reduced-fee program is 'everyone's' job, which means targeted communications and explicit responsibilities for this program's success lie with everybody in Recreation, but also with no one in particular. High-level questions about program effectiveness often don't land squarely with any staff member or specific workgroup. Clear ownership and milestones around who is responsible for program growth and

development may lead to programmatic improvements. Additional recommendations are found in the table below:

Component	Recommendation	Recommendation rationale
Strategy	<ul style="list-style-type: none"> (1) Balance an operational focus by articulating a long-term, strategic plan. (2) Design and execute a communications plan, include outreach goals and key partners. 	<p>Beyond goals around program administration and operations, there are no clearly articulated strategic goals. What's the long-term objective of the program? What is the program trying to accomplish? How are operational goals in service to long-term strategic goal(s)?</p> <p>Let data insights guide goals and inform long-term and short-term targets. For example, consider a short-term goal of increasing adult usage (people between 19-59), given that this user group has been recently shrinking.</p> <p>Complete work of establishing and executing a marketing/communications plan.</p>
Staff & Structure	<ul style="list-style-type: none"> (3) Identify ownership of program tasks, program boundaries 	<p>Specific operational tasks are absorbed by multiple staff, making accountability and leadership difficult. Who is responsible for managing the program? Clarify which staff are charged with various tasks, including marketing/relationship management within the community.</p>
Systems	<ul style="list-style-type: none"> (4) Strengthen the system for handling sensitive application materials. (5) Provide an online application option. (6) Align eligibility criteria with other City Rebates programs by using AMI instead of FPL. 	<p>A single, City-wide income-eligibility application could eliminate the burden of income verification for Recreation. Among other things, the current inter-office transfer of copies of sensitive documents among staff poses risks for residents' privacy.</p> <p>Complete work to provide an online application option.</p> <p>Measure poverty using a locally appropriate measure (% of AMI) consistent with other City rebate programs.</p>

EXECUTIVE SUMMARY PART 2: CROSS-CITY FINDINGS AND RECOMMENDATIONS

This evaluation is broken up into two parts, each with distinct findings. They include:

- 1) **Department-level recommendations** and findings relevant for specific, individual programs operating within the city.
- 2) **Cross-city recommendations and findings** for the *combined portfolio* of low-income programs enacted here at the City of Fort Collins;

These two parts and accompanying sets of recommendations, however, are not exactly equal. Within this evaluation, the Evaluation Team prioritizes a centralized, city-wide approach on the basis that cross-city programming could align individual programs, offer a single point of entry for participants, and ultimately deliver the exceptional customer service that the City sets out to deliver for low-income people, which represent a unique set of customers accessing government services.

To the extent that centralization and establishment of city-wide goals will take time and resources, more immediate changes can be made in the interim via department level recommendations.

KEY FINDINGS

Beyond individual rebate and reduced-fee program recommendations, this evaluation highlights several opportunities for an improved, city-wide approach to rebates and reduced-fees for low-income populations. This report estimates that less than half of eligible low-income individuals and families participate in one of the low-income City programs evaluated. Far fewer participate in more than one of these programs. **In fact, only 18% of the addresses used by an applicant are linked (by usage) to more than one of the rebate/reduced-fee programs evaluated in this study.** This means that significant progress may be made in the programs' overall reach (the absolute number of low-income individuals and families served) as well as participation depth (the proportion of participating families obtaining more of the City's opportunities).

Taken together, these individual rebate programs may function as a 'portfolio of options' that support and reinforce larger City goals around economic inclusion and poverty reduction. Right now, however, there is little strategic alignment between these programs. This includes the absence of an articulated set of shared, city-wide goals.

LESS THAN HALF OF LOW-INCOME PEOPLE PARTICIPATE IN ONE CITY REBATE/REDUCED-FEE PROGRAM

Estimating the number of low-income individuals in Fort Collins is a complicated undertaking. A suite of federal, regional and local poverty measures describe poverty according to household type (i.e., a family versus a household versus an individual), income level, and household size (e.g., a single individual versus multiple family/household members). As a result, each poverty measure sets different income thresholds for determining the local low-income population size.

Also, the existence of a large student population here in Fort Collins attending Colorado State University (CSU) or other higher-education institutes within in the city further complicates the

picture. Further explanation of how the authors estimated the poverty population may be found in the body of the report (see Section entitled Background & Key Concepts)⁷.

Using application data from each of the three Service Areas/departments (Utilities, Finance and Recreation) and attempting to control for estimated overlaps between programs, the Recreation Reduced-Fee program reaches the highest proportion of the City’s low-income population, followed by the FSA Rebates, followed by the UAP. Note that the population of the biggest component of the UAP, the IQAP program, is bounded by eligibility for state-wide LEAP. **Most importantly, more than half of all estimated City low-income households are currently not reached by any of the City of Fort Collins’s reduced-fee/rebate programs evaluated herein.**

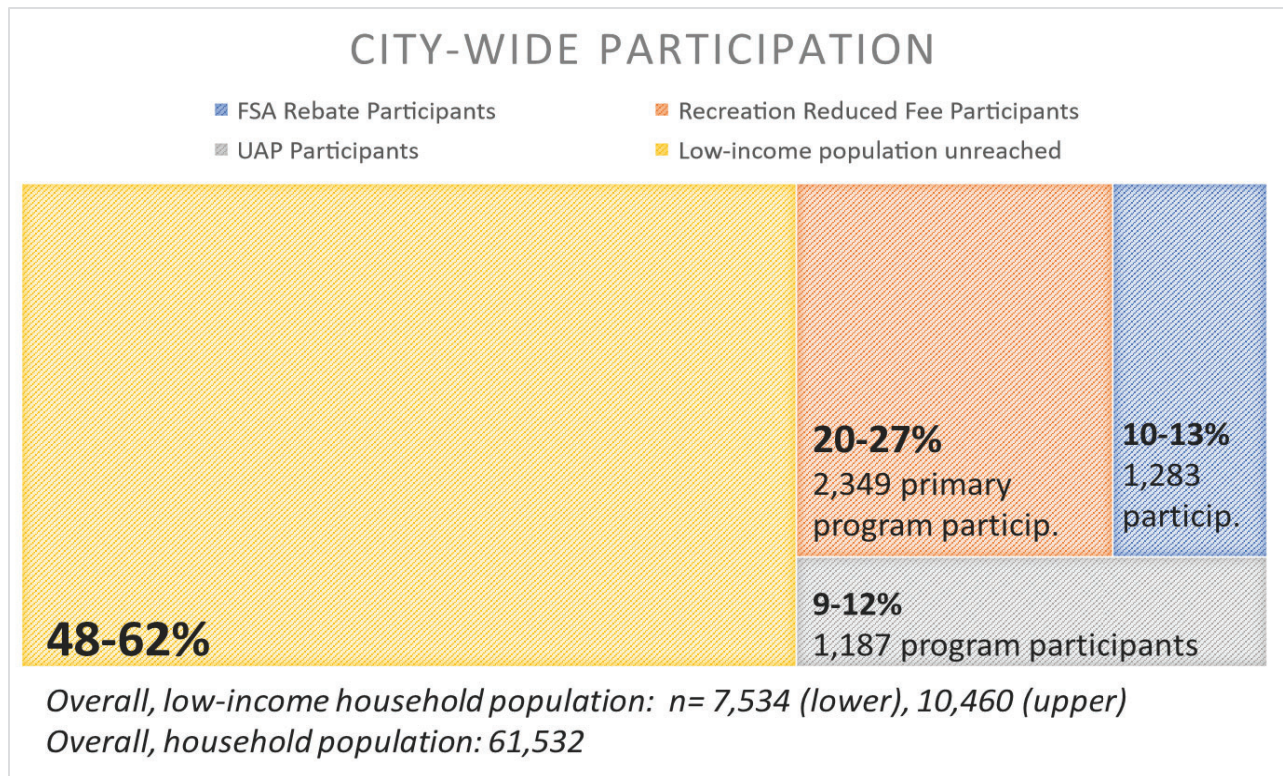


Figure 2: City-wide participation

LOW-INCOME PEOPLE ARE NOT CONSIDERED A UNIQUE CONSUMER OF CITY SERVICES

Perhaps as important as the information on the low participation in these City programs, the City’s low-income residents are not seen as unique users of the City’s services, unlike, for example, how the business community is viewed by the City. By defining low-income people as a unique customer, it follows that departments will see value in crafting specific communications and designing programs with that unique user in mind. Without a common understanding of the low-income resident as a unique customer, knitting these programs together will remain a challenge.

⁷ Fort Collins poverty estimates were calculated using 5-year estimates from the 2013-2017 American Census.

Explanations for why this population is unique include:

- **Geographic mobility.** These populations are managing temporary housing or moving frequently to find lower rent/housing costs.
- **Legal vulnerability.** Individuals and families might be dealing with legally challenging issues, including residency, immigration and criminal/civil problems.
- **Unique constraints.** When experiencing poverty, individuals and families juggle unique constraints that place different burdens on their time, decision-making and available resources (see discussion in Key Poverty Concepts). These conditions can include having multiple jobs, shift work, cognitive stress, family care, and transportation issues, among other things.

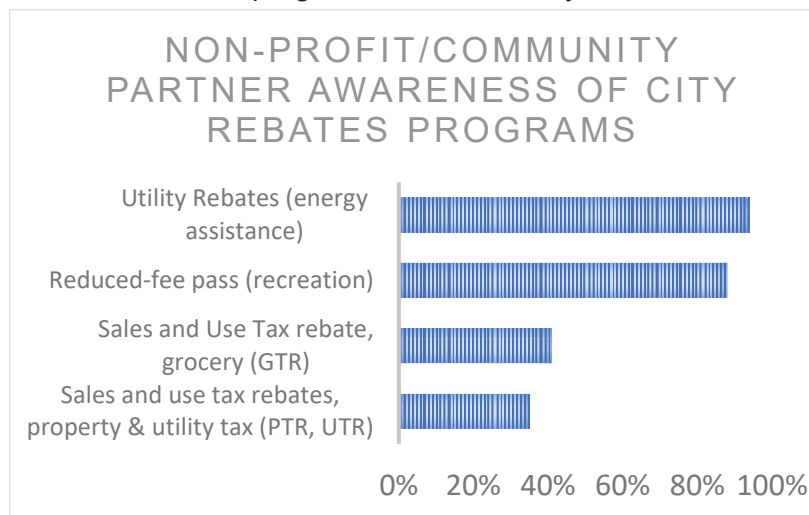
Recognizing low-income residents as a unique customer segment means:

- Developing a common language and poverty thresholds for this population.
- Adopting a set of strategic objectives and a strategic communications plan.
- Requiring standard user-specific design principles for programs and projects working with low-income populations.

VARIABLE COMMUNITY AWARENESS AND UNDER-UTILIZATION OF COMMUNITY PARTNERS

17 individuals from nine non-profit organizations serving Fort Collins and Larimer County residents were surveyed about their knowledge of, and collaboration with, City of Fort Collins reduced-fee/rebate programs. These partner community organizations included CSU Care Program, various UC Health/Poudre Valley programs, the Volunteer Income Tax Assistance Program, Project Self Sufficiency, Neighbor to Neighbor, Energy Outreach Colorado, and the Food Bank of Larimer County (See questionnaire in Appendix A). Close to 80% of non-profit partners surveyed indicated they work directly with low-income people in Fort Collins (Figure 3).

Between 80-90% of respondents were familiar with the City's reduced-fee recreation pass and the Utilities IQAP program. On the contrary, less than half knew about the property tax and utility tax rebates managed in Financial Services (35%).



As a result of differing levels of awareness and intentional collaboration, non-profits in Fort Collins extend varying levels of support for City reduced-fee and rebate programs. Lack of full support means lost marketing and outreach opportunities as well as lost opportunities for direct assistance with programs' application management, etc. Across the rebate/reduced-fee programs evaluated in this study, IQAP, followed by the reduced-fee recreation pass program, have the greatest

Figure 3: Cross-program rebate awareness of city stakeholders. Source: 2019 Survey data collected by Evaluation Team

familiarity in the community and the most direct non-profit support.

CITY-WIDE, LOW-INCOME PROGRAMMING IS INEFFICIENT

Crucially, low cross-program participation means a reduced return on City-sponsored social investments. Limited success in cross-program participation currently means a reduction in the potential combined impact of these programs—whereby the possible impact of the ‘portfolio of low-income services’ could be greater than the sum of independent department initiatives.

It also means that **each department charged with administering an income-eligible program pays the ‘full cost’ of its administration**, potentially re-processing the same applicant annually for multiple City services or expending the same time and energy trying to reach similar participants in the community.

Moreover, lack of centralization between these different programs has led departments to adopt different approaches, including different methods for leveraging community partners, variable eligibility thresholds affecting participation, and differing levels of staff/programmatic resources available for deployment. As a result, analysis performed for this report suggests that each department that manages a reduced-fee/rebate program has reached a slightly—or in some cases very different—low-income population.

ADDITIONAL CROSS-PROGRAM FINDINGS

- **Departments struggle with income verification and are misaligned around poverty thresholds.** Not only does each department pay the full cost of administration, but their targeting is not consistent, each reaching a slightly different segment of the impoverished population. Also, lack of standardization around management of applicants’ sensitive income verification documents is an underappreciated privacy and legal risk for the City.
- **Lack of standardized data and data tracking makes assessing resident engagement across City rebate/reduced-fee programs nearly impossible.** Better systems are needed to understand how low-income people fully interact with—or are isolated from—available City services.
- **Key community partners and non-profits are unaware of certain rebate/reduced-fee offerings at the City.** Without awareness, non-profits are unable to alert their low-income clients of City opportunities and help improve City programming.
- **Key community partners may know about some rebate programs, but partners could be better utilized.** Of the non-profits and community partners surveyed, no more than 50% actively support City rebate/reduced-fee programs either directly (by supporting low-income clients to fill out applications) or indirectly (via marketing like posters or flyers, or social media mentions).

RECOMMENDATIONS

STRATEGIC GOAL SETTING & CENTRALIZATION OF RESPONSIBILITY

Departments operate their programs in ‘silos’ with minimal resources and little city-wide strategic guidance. There is no set of city-wide goals, no central responsibility for ensuring that each program pursue unified goals nor a mechanism for aligning department-level actions.

Beyond a lack of shared, long-term city-wide strategic goals, differing department values and divergent department constraints (funds, staffing) further complicate the ability of these programs to coordinate optimally for low-income residents. Most departments accept the mandate to provide these services, but this means the provision of low-income programming is

in service to narrower department-level goals and not in service to broader city-wide goals for a unique customer segment.

Opportunities for bridging the responsibility gap:

1. **Establish a set of strategic City-wide goals** shared across departments and functions. For example, the Climate Action Plan (Our Climate Future), is a unified program that blankets the entire City; something similar for low-income programs would be catalytic for departments interacting with low-income residents. Those departments could then link resources and workplans to meet established cross-functional objectives.

The City-wide goals may emphasize:

- Promoting economic security with assistance in meeting basic needs (energy, tax relief) for the low-income population, and
 - Opportunities to access cultural events and recreation.
2. **Centralization of program administration.** Centralize administration of low-income services with dedicated FTE program manager(s) and cross-functional participation by relevant Service Area Directors.
 3. **Conduct annual portfolio performance reporting.** Annually assess how rebate/reduced-fee programs work together to achieve the aforementioned City-wide goals. Assess participation ‘depth’ and how/if program participants participate in more than one rebate program; determine if needed adjustments of program marketing occur based on estimates of new/emerging low-income demographics.

RECOGNIZE AND DESIGN FOR LOW- INCOME PEOPLE AS A UNIQUE CUSTOMER SEGMENT

Low-income residents within the city are not seen as unique users of the City’s services. This contrasts, for example, with a similarly unique identified customer segment like the business community⁸. By defining low-income people as unique customers and reporting on their experience with City services, departments will see value in crafting specific outreach and programs designed with that unique user in mind. Without a common understanding of the low-income resident as a unique customer, knitting these programs together will remain a challenge.

Opportunities to recognize and design for a unique low-income segment include:

1. Developing a common language and poverty thresholds to describe this population.
2. Adopting strategic goals and developing a strategic plan and communication plan specifically for this population.
3. Requiring departments to leverage user-specific, human centered design principles when developing, improving and managing programs that target low-income populations.

⁸ See the City’s Business Engagement and Action Plan (BEAP), co-managed by a cross-functional group from the Economic Health Office, Utilities Customer Engagement Team, the City Manager’s Office, etc.



BACKGROUND AND KEY CONCEPTS

The three sections in this chapter (Background, Key Poverty Concepts, Poverty in Fort Collins) explain the context for, the characteristics of and challenges faced by the City’s low-income population. These sections provide an understanding of this unique customer segment, which is necessary to assess the impacts of the City’s rebates/reduced-fee programs.

BACKGROUND

While certain populations are always at risk of being chronically poor, signals point to changing dynamics in Fort Collins and Northern Colorado. Many local community service providers are expressing increased concern that they are serving higher proportions of low-income people who work full-time (i.e., the ‘working poor’)⁹. This means that despite a low unemployment rate, which would otherwise signal a thriving workforce, the ability for working, low-income families to prosper in Fort Collins is questionable. This changing characteristic of low-income people in our community warrants a fresh look at the programs and policies that have been previously implemented.

THE PRICE OF BEING POOR

PAYING MORE FOR ENERGY, HOUSING AND FOOD

Compared to their middle-class or upper-class community members, low-income Americans who live in poverty pay more than moderate or high-income families for basic necessities—far more. As a percentage of income, poor families in the bottom 20% of income earners nationally, pay on average close to 10% of their annual income on energy costs. As a proportion of income, that’s almost seven times what the top 20% of income earners typically pay.

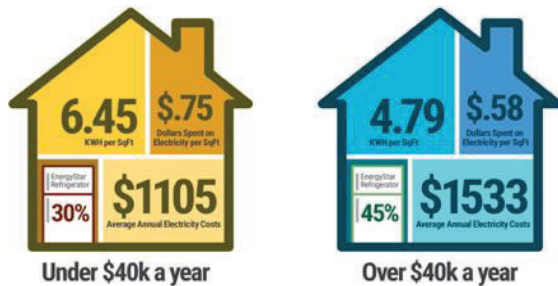


Figure 4: Low-income energy use

However, people who earn less aren’t just paying more for energy as a percentage of their income. For most low-income households, inefficient appliances and low-quality residential buildings means that additional energy is required per square foot to heat, cool and otherwise operate a residence (Figure 4)¹⁰. The result is higher energy costs per square foot compared to middle- or upper-income families and individuals. Given that low-income families are more likely to rent, these families bear the cost of utility bills but have no ability nor incentive to make capital investments around energy efficiency upgrades on a home they don’t own. Meanwhile, landlords have few economic incentives to make efficiency upgrades that would save their tenants money.

The point at which energy costs become burdensome enough to contribute to poverty is typically cited as a household devoting more than 6% of its income to energy-related costs¹¹.

⁹ Non-profit, County government and community partner interviews, 2019. Includes input from Larimer County Food Bank, Low-income Energy Assistance Program (LEAP), Human Services Department of Larimer County, Project Self Sufficiency, The Family Center (La Familia).

¹⁰ Goundswell (2016). <https://groundswell.org/study-finds-that-working-families-pay-the-most-for-electricity-despite-lower-price-trends-and-affordable-clean-energy-alternatives/>

¹¹ The Atlantic (2016). *Energy Poverty in Low-income Households*

<https://www.theatlantic.com/business/archive/2016/06/energy-poverty-low-income-households/486197/>

Across Larimer County, a typical household below 50% of the federal poverty level spends more than 21% on energy-related costs; energy poverty is all too common across the Front Range¹².

HOUSEHOLDS ON THE BRINK

For many families, housing affordability is part of the broader problem of having a low income. If you don't make enough money, you have trouble affording anything—including housing in competitive markets like Fort Collins. Based on 2000-2014 data from the Bureau of Economic Analysis (BEA), analyzed in 2016 by Pew Charitable Trust, low-income households' housing costs grew by more than 50% over the last 19 years¹³. The strain that housing places on Fort Collins families is documented in the City's 2015 Affordable Housing Strategic plan and in the 2019 City Strategic plan. In 2017, Fort Collins homes appreciated at the highest rate in the state, at more than 11.8%¹⁴.

Using a measurement of 200% of the Federal Poverty Level (\$50,200 for a family of 4 in 2018), the Larimer County Food Bank today serves over 18,000 people with a Fort Collins address out of the nearly 50,000 individuals who would qualify to use the Food Bank

based on American Community Survey 2018 figures. In Larimer County the absolute number of Fort Collins residents within the Larimer County Food Bank database has grown by 15% over the last six years (2014-2019)¹⁵. While the Food Bank may have been able to reach more individuals in the last six years, the combination of high housing costs, rising healthcare costs and soaring childcare costs squeezes the budgets of low-income families to the point these households are now seeking food assistance.

... average weekly wages in Colorado have been flat since 2000

—Bell Policy Center, 2018

ECONOMIC GROWTH ALONE HASN'T REDUCED POVERTY

While job-training programs and economic development are an essential part of promoting economic opportunity, climbing out of poverty is only possible when household earnings rise faster than the cost of living. In the decade after the Great Recession, the economy has benefited from growing national gross domestic product (GDP), job expansion, falling unemployment and rising stock prices¹⁶.

Yet in Colorado and elsewhere in the U.S, generating a steady, sufficient income by **obtaining and holding a single job is unlikely to completely lift an individual or family out of poverty**. Escalating costs of living continue to outpace wage growth, even though more Americans and Coloradans are working today than ever before¹⁷.

¹² Accounting Insights developed this interactive map and associated statistics based on information from the Energy Information Administration and from the U.S Census Bureau. <http://insideenergy.org/2016/05/08/high-utility-costs-force-hard-decisions-for-the-poor/>

¹³ Bell Policy Center, 2018. Guide To Economic Mobility. <https://www.bellpolicy.org/wp-content/uploads/2018/01/Guide-to-Economic-Mobility-FINAL.pdf>

¹⁴ Bell Policy Center, 2018. Guide To Economic Mobility. <https://www.bellpolicy.org/wp-content/uploads/2018/01/Guide-to-Economic-Mobility-FINAL.pdf>

¹⁵ Larimer County Food Bank interview, August 2, 2019. Supplemental Food Bank information provided to the Evaluations Team on August 5, 2019.

¹⁶ Brookings Metro Monitor, 2019. <https://www.brookings.edu/research/metro-monitor-2019-inclusion-remains-elusive-amid-widespread-metro-growth-and-rising-prosperity/>

¹⁷ Bureau of Economic Analysis (2019): https://www.bls.gov/eag/eag.co_fortcollins_msa.htm

Why aren't wages keeping up with rising costs of living? In the past, during periods of low unemployment and strong economic growth, such as the late 1990s, wages went up faster than they have in recent years. Nationally, wages grew by about 4.8 percent annually in the late 1990s, compared to 3.4 percent today. The Bell Policy Center offers the following theories about why workers don't seem to be enjoying the same economic gains today as they have during other historic times of economic expansion¹⁸:

1. **Our low unemployment numbers aren't giving us the whole picture.** Throughout 2019, the local unemployment rate for Fort Collins hovered at a very low 2%. State economists agree that this number doesn't include discouraged or permanently unemployed workers who remain on sidelines—including those that fared the worst during the Great Recession.
2. **A growing imbalance between workers and employers.** A significant decline in unionization and an increase in the concentration of dominant employers in certain industries and areas has placed downward pressure on wage growth. Popular use of the contractor classification has also limited benefits for those workers and reduced payroll costs for employers.
3. **The workforce's changing composition makes wage growth appear lower than it really is.** Older, higher paid workers are leaving the workforce and being replaced by younger, lower paid workers. Also, new entrants into the workforce moving from part-time to full-time work are generally earning less than the typical full-time time worker.

Regardless of why wages aren't keeping up with costs of living, typically poor subsectors of the population, like seniors and persons with disabilities, are being joined by the 'working poor' which includes individuals and families, some of whom should be in their prime earning years. Even as labor participation (as indicated by declining unemployment rates) and U.S. GDP have grown, the rate of people in poverty across the country has continued to rise (Figure 5).

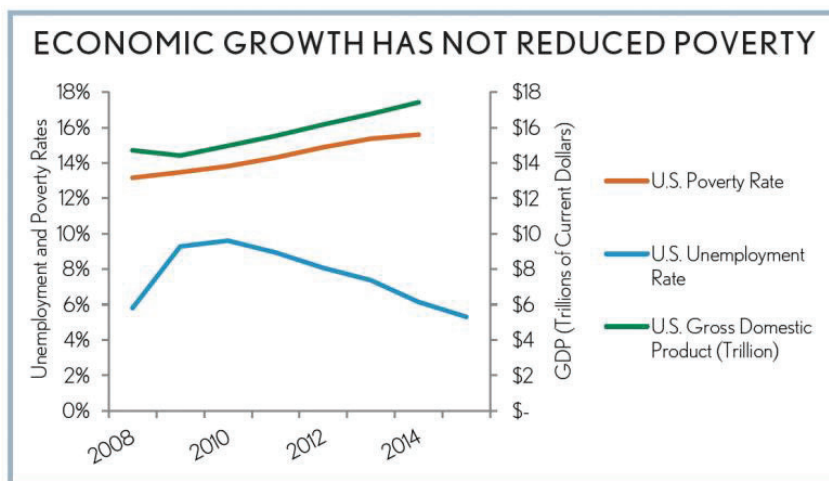


Figure 5: Source: Urban Opportunity Agenda, Center for Neighborhood Technology (CNT).

¹⁸ Bell Policy center (2018). <http://www.bellpolicy.org/2019/05/02/wages-inflation/>

KEY POVERTY CONCEPTS

Three behavioral science concepts have guided the findings and recommendations within this report:

- Recognition that poverty is multi-dimensional and much more than just a lack of money.
- Poverty imposes a significant cognitive burden on families and individuals. As a result, low-income people make very different decisions than their non-poor counterparts.
- Successful poverty alleviation programs/policies must address low-income people as unique users of government services and design for low-income users' behaviors and needs.

POVERTY DRAINS THE VERY RESOURCES NECESSARY FOR OVERCOMING POVERTY

Behavioral research has shown that human beings leverage more than just economic capital (or the lack thereof) when making decisions about meeting needs and securing their well-being (BIT 2016)¹⁹. Figure 6, below, describes the types of resources (capital) relevant to this discussion of well-being and poverty alleviation.

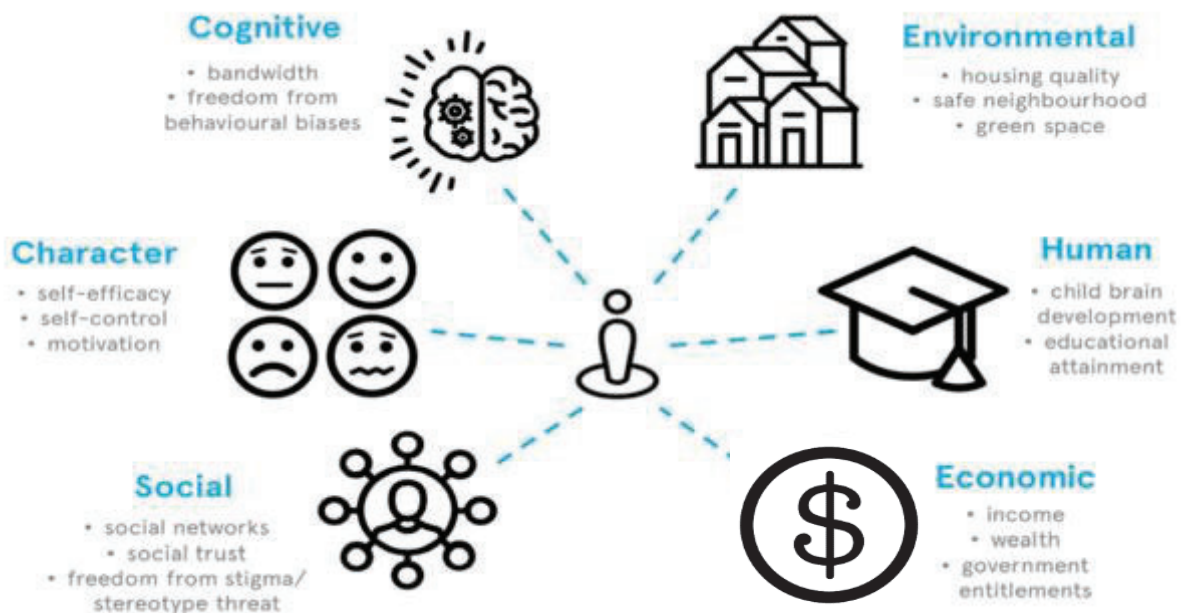


Figure 6: Behavioral research and capital types

An individual or family's ability to store or replenish stocks is necessary for building and sustaining overall well-being. This includes educational capital (educational attainment and technical qualifications), human cognitive capital (childhood brain development and decision-making capacity and mental bandwidth), environmental capital (e.g., housing quality, safety,

¹⁹ Behavioral Insights Ltd. (2016). Poverty and Decision-Making: How Behavioral Science Can Improve Opportunity in the UK. <https://www.bi.team/wp-content/uploads/2017/02/JRF-poverty-and-decision-making.pdf>

access to natural space), social capital (e.g., social networks, freedom from stigma) and character capital (e.g., self-control, motivation). When one or more capital stocks or assets are low, individuals and families pull from other assets or capital stocks to compensate or cope. This is true for all people, including low-income people. However, for low-income people the consequences of chronic drains on various capital stocks or the underinvestment in certain stocks have implications for obtaining a healthy, happy and productive life, i.e., for ensuring well-being and reducing the chances of falling into poverty. Each of these capital stocks have consequences when depleted or underinvested in: impacts can last a short time, or entrench an individual, family or even a generation, into a cycle of poverty.

For government agencies and public policy makers, understanding how these types of capital work together toward--or against--various aspects of well-being is important to building policies and programs that disrupt these cycles and meet low-income people where they're at currently.

POVERTY INFLUENCES DECISION-MAKING

Low income people are unique customers who apply for, access and benefit from municipal services. As noted above, poverty impacts the resources people draw upon to manage their lives and cope with the various economic, social or environmental shocks life might bring. Understanding the resource constraints low-income people typically manage and the way those constraints affect their decision-making may help the City and other public sector agencies better design programs specifically for low-income customer success. This section discusses how poverty affects cognitive capital and, ultimately, how many people experiencing poverty make decisions.

Recently, attention has focused on the cognitive burden that poverty imposes. In fact, recent neuroscientific research suggests that the condition of poverty imposes a mental burden akin to losing 13 IQ points (Mani et al. 2013)²⁰. This means that impoverished families are not only trying to optimize their decision-making with a limited, disadvantaged resource/capital set, but they are trying to optimize under conditions that limit mental bandwidth. As a 2016 Behavioral Insights Team study points out:

“...the context in which people on low-incomes live means that they have fewer opportunities to replenish or rest their cognitive resources compared to people on higher incomes. This includes the physical context in which they live, such as noisy urban environments without green space and with the emotional fatigue that comes from stifling negative feelings associated with job loss and stigma.

Poor families and individuals must also make many more critical decisions in a day compared to those who have financial and time-buffers, from complying with the conditions of welfare payments to coordinating irregular shift-work and managing childcare.” (BIT 2016, p. 13-14).

Poverty exists as both a cause and consequence of reduced mental bandwidth, or cognitive capital²¹. Successful poverty alleviation efforts recognize that seemingly sub-optimal decisions

²⁰ Mani et al. (2013). Poverty Impedes Cognitive Function. *Science*, Vol 341 (6149), pp.976-980.

<https://science.sciencemag.org/content/341/6149/976.abstract>

²¹ The Atlantic (2013). Your Brain on Poverty: Why Poor People Seem to Make Bad Decisions.

<https://www.theatlantic.com/business/archive/2013/11/your-brain-on-poverty-why-poor-people-seem-to-make-bad-decisions/281780/>

by low-income people may be made because those individuals exist in a very different environment and with a very different set of resources, than non-poor people.

LOW-INCOME PEOPLE ARE UNIQUE USERS OF GOVERNMENT SERVICES

Given that poor people may have different resources and different decision-making abilities than their non-poor counterparts, they represent a unique group accessing government services. On the flip side, when government policies and programs are designed without a deep understanding of the poverty context, i.e., how low-income people make decisions, what resources they do/don't have available, etc., poverty alleviation programs at the local level may fail to make an impact.

Throughout this evaluation on income-eligible reduced-fees and rebates, the following design aspects and questions are considered:

- **Low-income people are unique users of government services. People experiencing poverty do not make decisions like their non-poor counterparts.**
 - What evidence exists that the policy/program has designed for the 'poverty experience?'
 - From a low-income user's point of view, what is going right? What might be missing?
 - What, if any, kinds of Human Centered Design²² elements are incorporated?
- **Policymakers and program designers must minimize the time and mental costs of engaging with government or other locally available services.**
 - Where are we bundling application processes and eligibility requirements to streamline interactions?
 - How are policies and programs considering and/or alleviating the unique mental burdens associated with poverty?

This evaluation thus continues with a dual focus on evaluating the availability and efficiency of reduced-fee and rebate programs and the extent to which these policies/programs have a unique customer focus on low-income people.

²² Human Centered Design principles and toolkit can be found at: <https://www.designkit.org/human-centered-design>

POVERTY IN FORT COLLINS

Estimates of the number of households in poverty in Fort Collins are useful for determining how successful City Rebate programs have been in reaching low-income people. Are we reaching 5%, 25% or 90% of eligible households?

MEASURING POVERTY

Multiple measures of poverty exist for divergent and diverse reasons. In the United States, poverty is typically measured by three, non-interchangeable indicators. These include Census Bureau poverty thresholds, the Federal Poverty Level (FPL) and area median income (AMI) thresholds. Each measure is relative to household size.

- **U.S. Census Bureau poverty thresholds** are measured annually, specific to region and used to determine official poverty population statistics for the nation, states and localities across the country. With this poverty threshold, one may broadly estimate not only how many people are poor, but how poverty is distributed by age, race, ethnicity, region and family type.
- **Federal Poverty Level (FPL) guidelines.** FPL reflects income cutoff levels annually issued by the Department of Health and Human Services. FPL is used administratively to determine financial eligibility for federal programs. While these guidelines do account for variability in cost of living across regions, FPL is not typically used to estimate regional poverty.
- **Area Median Income (AMI) thresholds** refer to the income level that divides the population income distribution of an area in half, with half the population above that income amount, and half below. AMI is generally analogous to the Department of Housing and Urban Development's (HUDs) Median Family Income estimates, which are broken down into low (households earning 80% of AMI), very low (households earning 50% of AMI) and extremely low (households 30% or less of AMI). These figures consider local area costs of living.

Estimates of the number of households in, or adjacent to poverty in Fort Collins is useful for understanding how successful our City Rebate programs have been in enrolling low-income people.

Which poverty measure is most relevant for local government programming?

The Census Bureau's poverty thresholds are the same nationwide, no sperate figures for different states or cities. The FPL guidelines are simplified versions of the Census poverty thresholds and they exist only to determine financial eligibility for certain federal programs.

AMI is typically the most meaningful measure of poverty for most local government purposes. It accounts for local cost of living and is a good estimate of regional earnings.

For estimating the larger pool of low-income individuals and families, this report uses the Census bureau poverty thresholds, given that the census is the most comprehensive dataset available that measures poverty locally and at different levels of age, household size and household composition. Generally, the Census poverty thresholds are slightly stricter, capturing more extreme poverty levels than, for example, the AMI estimates.

	Income limit for single individual	Income limit for family of 4	Current City Rebate/Reduced-Fee program using this measure...	How this report (2019 City Rebate Evaluation) uses this measure...
Census bureau poverty thresholds	<ul style="list-style-type: none"> • \$13,064 (under age 65) 	<ul style="list-style-type: none"> • \$25,465 (two adults, two children under 18) 	N/A	Estimating the pool of low-income individuals/households in Fort Collins.
FPL guidelines	200% FPL: <ul style="list-style-type: none"> • \$24,280 	200% FPL: <ul style="list-style-type: none"> • \$50,200 	Recreation: <ul style="list-style-type: none"> • 185% FPL 	N/A
AMI / HUD median family income estimates (separate estimates for county, state)	60% State AMI: <ul style="list-style-type: none"> • \$28,452 50% County AMI: <ul style="list-style-type: none"> • \$26,900 	60% State AMI: <ul style="list-style-type: none"> • \$54,732 50% County AMI: <ul style="list-style-type: none"> • \$38,400 	<ul style="list-style-type: none"> • LEAP/IQAP uses 60% of state AMI • FSA rebates uses 50% County AMI 	N/A

Lack of a comprehensive, localized poverty dataset for Fort Collins residents means that estimating the number of poor people in this community is a challenge.

Also, understanding the characteristics of these low-income households is important for evaluating the City’s outreach effort and for assessing if any specific groups of people are not reached. For example, if female-headed households represent a significant proportion of our poor households, do we find a comparable proportion of them participating in our low-income programs?

If the absolute number of people participating in these programs is low or specific demographic characteristics are not represented in participant data, each has a bearing on the City Rebates programs’ marketing effectiveness.

HOW MANY PEOPLE ARE POOR IN FORT COLLINS?

Poverty rates are specific to the family, household or individual units of interest. Without controlling for students²³, the individual poverty rate in Fort Collins according to the American Community Survey (ACS) administered by the Census Bureau, is 17%²⁴. However, when controlling for a high student population (i.e., removal of all individuals between 18-35 years), the poverty rate falls to just over 6%. Knowing that not all residents in that age bracket within Fort Collins are students and that some students are, indeed, permanent residents in need of low-income services from the City, this report uses an average between 17% (as the upper

²³ Controlling” for students means accounting for the fact that our local student population has an outsized effect on the outcome of interest, in this case, poverty. Many students are stepping out of the economy and forgoing current wages in lieu of investing in their education in the hopes of future, higher earnings. By identifying and then isolating—as much as possible—students from the underlying population, we can see what poverty looks like in addition to, or outside of, students.

²⁴ 2017 American Community Survey 5-year Estimates 2013-2017. Note: all statistics use Fort Collins, City, not Metro Area.

bound) and 6% (as the lower bound) to arrive at a **city-wide poverty average of 12.2%**. With a population of 171,100 this means that over 20,000 individuals are low-income in this community.

The poverty rate for families, which, when compared to the total poverty rate of all individuals in the city, measures poverty within a much smaller pool that includes household units where 2+ people are related by blood or marriage (n= 33,531). The poverty rate for families is 6.4%. However, when the head of the family household is a sole female with no partner present, the rate is more than three times as high (20.8%).

Families are distinct from *households*, which include household units of one person or 2+ people that may or may not be related by blood or marriage (n= 61,532). Using the individual poverty rate of 17% as the upper bound and 12.2% (the poverty average that includes some students, but not all) as the lower bound, between 7,534-10,460 households are estimated to be poor within Fort Collins (Figure 7).

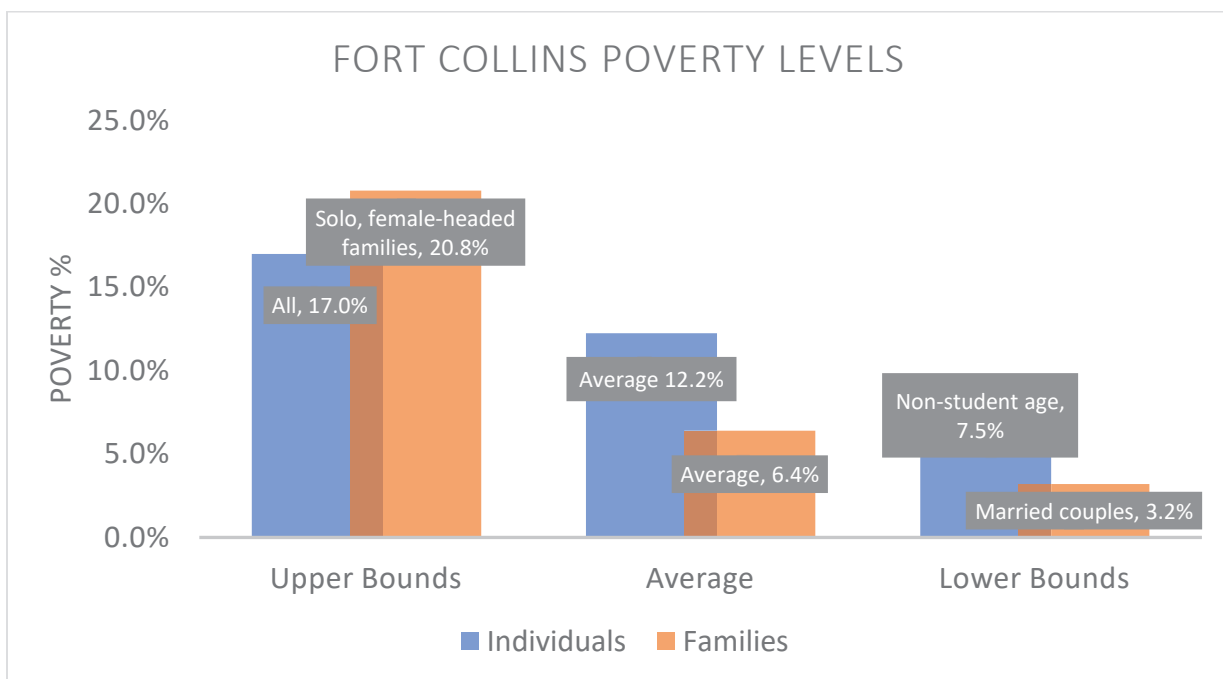


Figure 7: Fort Collins Poverty Levels

The difference between an adequate income, a sufficient income, and a low income is nuanced, and time bound. Being low-income means income insufficiency, i.e., not having enough income to cover basic expenses or living on 'the edge' of poverty. Adequate income means the general ability to recover from a life shock (an illness, a financial emergency). In Fort Collins, the Economic Policy Institute (EPI)²⁵ identifies an adequate income for 1 adult living in Fort Collins to be \$38,947. In contrast, the self-sufficiency standard for Larimer County is \$25,124, suggesting a significant gap between sufficiency and adequacy, in other words, between having or not having a financial cushion to survive a negative economic shock/event. In terms of income adequacy, a couple with two children would require an income of over \$89,000 for an 'adequate' life in Fort Collins (EPI 2019).

Poverty in Fort Collins: getting the numbers straight

- **2,146 estimated poor families:** defined as family units, 2+ people who live together who are related by birth or marriage.
- **7,534-10,460 estimated range of impoverished households:** defined as home-units of one or more people who may or may not be related by birth, marriage, etc.
- **20,948-29,087 estimated impoverished individuals:** total number of estimated individuals, based on a total population number of 171,100

While measuring actual poverty rates in Fort Collins is important, knowing the number of people who are living on an income that puts them *at risk* of falling into poverty is also important. In our community, the latter is much greater than the former.

WHAT CHARACTERIZES THE POOR IN FORT COLLINS?

While some of the characteristics of individuals and families facing poverty are well-known, others remain hidden and are specific to particular regions and unique economic realities. Within Fort Collins and across Colorado, race plays an important role. Native Americans, Blacks and Hispanic/Latinx workers have lower incomes, higher poverty rates, fewer assets, lower educational attainment levels, lower homeownership rates and poorer health outcomes than the majority white population²⁶.

What characteristics make someone more likely to be poor in Fort Collins?
Being Black, Hispanic/Latinx, and female. Women are 10% more likely than men to experience poverty.

What kinds of families are poor in Fort Collins?
26% of female-headed households (no partner present) experience poverty in this community.

and Hispanic/Latinx workers have lower incomes, higher poverty rates, fewer assets, lower educational attainment levels, lower homeownership rates and poorer health outcomes than the majority white population²⁶.

In Fort Collins, the median household income for non-white racial groups is approximately \$42,333 lower than for white households²⁷.

²⁵ The Economic Policy Institute (EPI) is a nonprofit, nonpartisan think tank created in 1986 to include the needs of low- and middle-income workers in economic policy discussions.

²⁶ Bell Policy Center, (2018). Guide to Economic Mobility in Colorado. <https://www.bellpolicy.org/wp-content/uploads/2018/01/Guide-to-Economic-Mobility-FINAL.pdf>

²⁷ City Plan Fort Collins, 2019. <https://ourcity.fcgov.com/cityplan/documents> (p.22-23).

While Latinx families have a higher probability of being poor when compared to their white counterparts, in terms of absolute poverty numbers, Latinx represent a smaller share of the poor

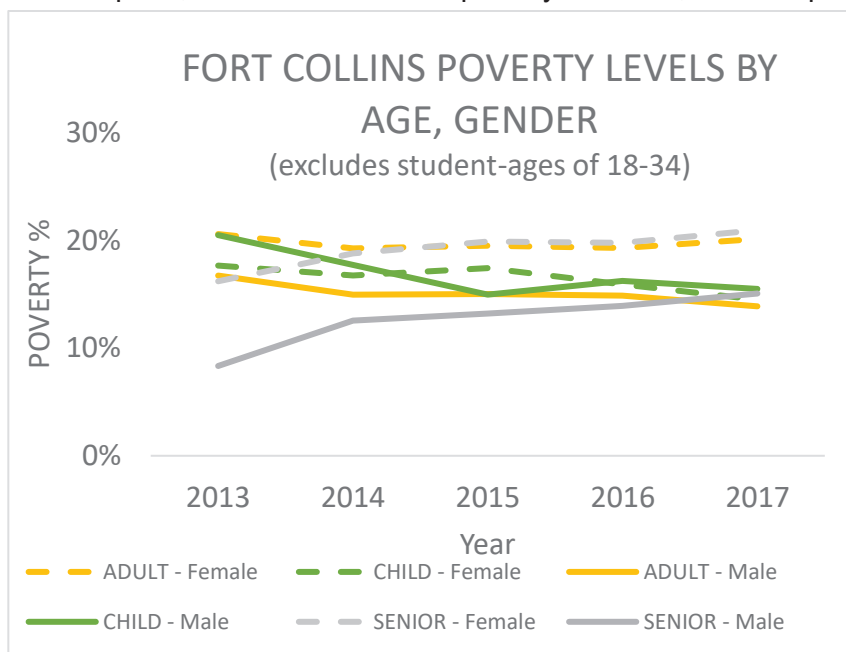


Figure 8: Poverty by age, gender

population at large. Nearly 3 out of 4 low-income individuals are classified as white.

Two other characteristics show up in the City’s poverty data: age and gender (Figure 8). Each plays an important role in determining poverty status. At first glance, the City’s high population of students indicates that the majority of the poor (around 30% of the local poverty population) are students between the ages of 18-24. However, controlling for a high the student population (i.e., removal of that age demographic), paints a different picture of what age

groups and genders are suffering poverty²⁸. Senior females (ages 60+) and, surprisingly, adult women characterize the most impoverished demographics. Adult men are least likely to be impoverished. Throughout the last five years, this data suggests that women have a higher poverty percentage by more than 10 percentage points, compared to males.

SUMMARY: WHY IS UNDERSTANDING AND ADDRESSING POVERTY NEEDS FOR FORT COLLINS IMPORTANT FOR THE CITY?

Understanding the characteristics of the city’s low-income households is important for evaluating the City’s outreach efforts and for assessing how and if specific low-income people are successfully participating in relevant City programs. **The City’s vision is to provide world-class municipal service and its mission is to provide exceptional service for an exceptional community; this includes the services and policies targeting resident customers who are low income.**

Low-income people in Fort Collins, like elsewhere, are not homogenous. In Fort Collins, certain demographic groups are disproportionately low-income, requiring different outreach, marketing and strategic efforts. In Fort Collins, this includes women, especially senior and adult women, in addition to people of color.

The demographics of low-income people may or may not be unique when compared to other

City Vision: To provide world-class municipal services through operational excellence and a culture of innovation.

City Mission: Exceptional service for an exceptional community.

²⁸ Importantly, the typical datasets available through the census –as used in this evaluation-- do not capture data on non-binary or gender fluid individuals. The authors recognize that this leaves an entire population of people out, and laments another example of institutionalized gendering.

communities, but better knowledge of this population and the unique demographics that they embody offers an important opportunity for the City to assess impact, better target, and specifically design policies and programs for these users of government services.



PART 1: INDIVIDUAL REBATE & REDUCED-FEE PROGRAMS

UTILITIES AFFORDABILITY PORTFOLIO: REDUCING ENERGY/WATER COSTS

As an umbrella program, the Utilities Affordability Portfolio (UAP) houses multiple programs for low-income and/or vulnerable populations seeking to obtain affordable electrical, water and wastewater utility services from the City of Fort Collins. The UAP includes:

1. **Medical Assistance Program (MAP).** This program provides financial assistance for income-qualified individuals who have a doctor-approved medical condition that requires medical equipment that uses additional energy (e.g., a ventilator or air conditioning).
2. **Income Qualified Assistance Program (IQAP).** This program allows eligible low-income individuals to be charged a lower rate for their energy, water and wastewater service.
3. **Payment Assistance Fund (PAF).** This program provides one-time assistance for individuals who experience a sudden economic shock and are unable to pay for utility service temporarily.

To find the best program or programs for a customer, the City of Fort Collins Utility (CFCU) Customer Service Representatives (CSRs) or the UAP program manager work together to identify the best fit for a customer's unique needs.

HISTORY

Energy prices are uniquely stable in Fort Collins and across Colorado, given the energy sources for heating and cooling available in the state. Throughout the span of the CFCU, various programs have existed within Utilities to support low-income customers, including some dating back to the 1980s²⁹. In 2005, the CFCU implemented a Payment Assistance Fund and in 2012, City Council passed a tiered rate system for utility customers.

2019 marks the first pilot-year of the Income-Qualified Assistance Program.

At the time that the 2012 tiered system was adopted, concerns were raised about the impacts the tiered rates would have on low-income individuals and families. A small group of citizens expressed concern that their medical needs required them to use additional energy and thus they would be disproportionately affected by a change in utility costs. This confluence of events launched interest in and development of the Medical Assistance Program (MAP), which began that same year, and catalyzed a cross-functional City team to explore opportunities around greater low-income programming for energy and water assistance.

LAUNCHING IQAP

While the MAP was launched quickly, the low-income programming work took much longer to design, develop and ultimately be approved by Council. Starting in 2013, a cross-functional exploratory group consisting of Utilities staff, City staff, and local non-profits, considered programs that could address chronic energy poverty as well as a temporary crisis. Regarding the latter, the City's Payment Assistance Fund (PAF) had been implemented in 2005, and the team considered what improvements could be made to strengthen and support the existing

²⁹ Ordinance No. 8, 1985 specifies the conditions and funding of the REACH program (formerly known as SAVE).

program. Major recommendations in the 2014 Low-Income Assistance Program Report, Fort Collins Utilities included:

1. Establish definitions of low-income criteria for participation, including:
 - Verification of low income (using AMI)
 - Confirmation as a Utilities customer
 - Participation in efficiency/conservation education
2. Administer temporary crisis relief via PAF.
3. Acknowledge chronic poverty situations with an income-qualified rate (IQR) for customers falling between 0-29% AMI and for those between 30-50% AMI.
4. Eliminate the MAP, given the above-mentioned rates for eligible low-income individuals and families.

When the recommendations for an IQR came through City Council in 2016, discussion was tabled and development and execution of an IQR stalled. Over the next year, the PAF and MAP continued to operate as staff waited for another opportunity to bring the IQR before Council. When Utilities took the Time-of-Day (ToD) Utilities pricing to Council in 2017, the conversation renewed interest and prioritization of an IQR. In early 2018, Council passed the IQR ³⁰.

Throughout 2018 the program was researched and conceptualized, and a pilot was launched in the fall of 2018. In the fall of 2019, the IQR, now called the Income Qualified Assistance Program (IQAP), completed its first pilot year and Utilities is scheduled to report initial progress to Council after analysis of the first year is completed by CFCU staff.

PROGRAM BUDGET, COORDINATION, OUTREACH AND OPERATIONS

Today, the umbrella UAP manages multiple programs including the MAP, the PAF, and IQAP (previously discussed as the IQR). For the first-year pilot of IQAP, the program has leveraged a relationship with the Colorado Low-income Energy Assistance Program (LEAP), a state-wide effort to provide a more holistic set of services for low-income individuals requiring utility-cost reduction. While IQAP is still in its infancy, spatial mapping suggests that there is UAP participation across the city (Appendix B).

For IQAP participation, CFCU customers must first apply through LEAP and become LEAP-qualified to participate. Once an individual's status as a LEAP-qualified participant has been verified, the CFCU then confirms that the individual is a CFCU customer for one or more of following: water, wastewater and/or electricity. After submitting an IQAP-specific application (Appendix D), an individual's rate is then adjusted to provide a monthly discount. A full review of the IQAP program process may be found in Appendix C.

³⁰ City Council Work Session on January 30, 2018.

http://citydocs.fcgov.com/?cmd=convert&vid=72&docid=3100394&dt=AGENDA+ITEM&doc_download_date=JAN-30-2018&ITEM_NUMBER=02

BUDGET AND RESOURCES

	2019 FTE	2019 Budgeted
Personnel	2.35 (spread over 5 people)	\$129,740
Programmatic		\$16,939
Annual program spending in 2019		\$146,679

The UAP program provides dedicated budget resources for programmatic costs like marketing, printing, postage and other material and supply costs. One full-time FTE manages the portfolio year-round, building relationships with non-profits and key stakeholders, and directly interfacing with CFCU utility customers who are (or could be) enrolled in IQAP or MAP. The CFCU also devotes a proportion

of time from a supervisor and several support FTE (4 total) to support the UAP. Customer Service representatives may also devote time to UAP as they interact with and/or refer residents to the UAP program.

Given that IQAP and MAP represent reduced rates, the program estimates dollars 'saved' by customers as a method of estimating dollars invested in UAP programming. In other words, dollars saved represents revenue forgone for the CFCU in pursuit of a larger social goal. IQAP, for example, found actual customer savings of \$137,614 in 2019. Project staff expect the 2020 savings to increase due to rate increases.

Funds available for distribution within the PAF vary annually. The PAF is replenished by agreements with Energy Outreach Colorado who matches CFCU dollars 1:1 to support customers needing payment assistance. Additionally, unclaimed utilities funds are also annually deposited into the PAF and individual community donors may opt to pay into the PAF directly with an individual contribution³¹. From these sources, between \$120,000-\$160,000 are annually pooled for the PAF.

COORDINATION WITH LEAP

The income verification step required by all City rebate and reduced-fee programs represents a time and data-intensive burden for staff. The processes require that departments provide training and follow adequate data security measures to ensure the privacy of participant data (see Appendix C, IQAP program process).

For IQAP, the coordination with the state-managed LEAP provides the following benefits:

1. Reduces the CFCU/UAP burden of income verification and eliminates a second round of income verification requirements for applicants.
2. Ensures low-income people are receiving information about additional, necessary energy/water assistance services available through State/local partners for services including weatherization and conservation education.
3. Provides increased program visibility via LEAP outreach that occurs through other local LEAP administrators such as non-profit agencies, etc.
4. Provides additional promotional opportunities via LEAP outreach assets, e.g., mobile LEAP application van at pop-up events, etc.

A list of potential IQAP applicants is circulated quarterly between LEAP and the UAP. The UAP uses this list to identify potential IQAP customers and verify LEAP status (which is a prerequisite

³¹ For example, unclaimed funds deposited into the PAF in 2018 and 2019 were \$50,866 and \$59,327, respectively.

for IQAP participation). The UAP team does not verify income but does require an additional application apart from the original LEAP application. The steps in identifying IQAP participants include:

1. Verification that individuals on the 'master LEAP list' are in fact CFCU customers. Staff must also identify the type of service received (i.e., wastewater, water, wastewater and electricity). **In 2019, total LEAP participation with a Fort Collins address was 1,652.**
2. Sending this 'verified list' back to LEAP, whereby LEAP inserts additional sensitive information (mailing address, home type, etc.). **In 2019, 29% of LEAP-enrolled individuals are not verified CFCU customers.**
3. Upon receipt of the verified member list from LEAP, UAP may conduct marketing and outreach to grow IQAP membership or quickly verify LEAP status if a LEAP participant decides to participate in IQAP.

In the 2018-2019 pilot year, CFCU's IQAP program reached ~60% of eligible, LEAP qualified participants.

Even though IQAP applicants enrolled in LEAP have already had their income verified, the CFCU requires an additional IQAP application for enrollment. Staff designing the original program in 2014 had recommended an auto-enroll option once LEAP verification and CFCU customer status was confirmed. When the pilot eventually began, a then-Councilperson requested an additional IQAP application (which included an affidavit). Conversations among a new Council, Executive Leadership and UAP staff in 2019 have signaled renewed interest in understanding the merits of auto-enrollment without a separate application. Recently, Executive Leadership has asked for additional information about the need and use of affidavits for the City's public benefit programs³².

OUTREACH

Nonprofit partners surveyed within the community indicated a strong familiarity with the program (Figure 9). This year, the IQAP program was promoted by CFCU and LEAP at various Larimer County Conservation Corps events like the 'How to Read Your Bill' training in January 2019. It

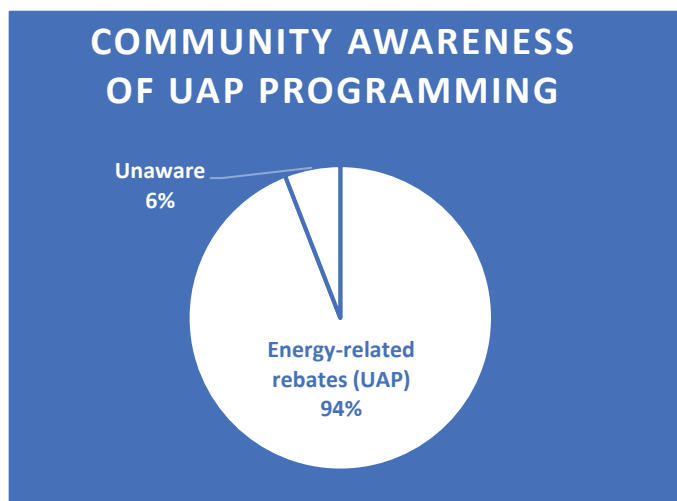


Figure 9: Community awareness of UAP programming

was also promoted at other community events like the Jax Homestead Day, the Work Life Balance Resource Fair, the CSU Career Discussion Panel and various CFCU billing trainings held at the Senior Center. IQAP outreach also benefits from 'pop-up' outreach provided by the mobile LEAP van. The van arrives at various community events throughout the year such as events put on by Larimer County, the Lions Club, CSU, and provides on-site enrollment.

The PAF, however, functions via referrals from non-profit agencies working with low-income individuals and families who are at risk of immediate utility shut-. CFCU may also identify individuals and families via

³² January 2020 memo entitled City of Fort Collins Public Benefits and Legal Status Requirements Memorandum.

Customer Service Representatives.

OPERATION

UAP At a Glance³³

PAF – emergency utility assistance	<p>Key Facts</p> <ul style="list-style-type: none"> • 350 participants for 2018-'19 season. <p>Rebate impact</p> <ul style="list-style-type: none"> • PAF allocates approximately \$80,000 to families. • Average customer benefit \$250/month. 	<p>Application/requirements</p> <ul style="list-style-type: none"> • Applicant utility account must be in arrears. <p>Income Verification</p> <ul style="list-style-type: none"> • Income verification is typically done through a non-profit partner. • Income threshold is 80% Larimer County AMI³⁴. <p>Key Focus</p> <ul style="list-style-type: none"> • PAF is focused on one-time, emergency assistance. • It is not intended to mitigate chronic poverty issues.
MAP – medical utility assistance	<p>Key Facts</p> <ul style="list-style-type: none"> • 167 participants in 2019. <p>Rebate impact</p> <ul style="list-style-type: none"> • Average savings were between \$86-\$185 annually, depending on medical device use and corresponding rate code. • MAP customers saved ~22% on their overall energy bill in 2019³⁵. 	<p>Application/requirements</p> <ul style="list-style-type: none"> • Unique application is required and managed by UAP (Appendix E). • Medical justification described and signed-for by a medical doctor. <p>Income Verification</p> <ul style="list-style-type: none"> • Income is self-reported via applicant and not typically verified by the CFCU. • Income threshold is 60% Larimer County AMI. <p>Key Concerns</p> <ul style="list-style-type: none"> • MAP and IQAP can be duplicative. Staff recommended back in 2014 that the MAP program be phased out once IQAP was established. • IQAP tends to be a better rate for low-income customers who qualify.
IQAP – reduced utility rate	<p>Key Facts</p> <ul style="list-style-type: none"> • ~700 monthly participants in 2019. <p>Rebate impact</p> <ul style="list-style-type: none"> • ~23% discount applied • Participants saved an average of 19% for electric, 20% for water, 23% for wastewater. 	<p>Application/requirements</p> <ul style="list-style-type: none"> • LEAP application & acceptance is required. • IQAP application and affidavit required (Appendix D). • Must be a verified CFCU utilities customer. <p>Income Verification</p> <ul style="list-style-type: none"> • Income is verified via the state-managed LEAP program. • Income threshold for LEAP is 165% of Federal Poverty Line. For the 2019/2020 season, this changed to 60% State Median Income, effectively expanding the pool of eligible households.

³³ Figures on participation and savings are current as of December 2019. In 2019, ~700 residents participated in IQAP of an available pool of 1,144 LEAP-qualified residents living in Fort Collins and receiving utilities from CFCU.

³⁴ This threshold is set by Energy Outreach Colorado, a statewide nonprofit agency that manages energy poverty work on behalf of the State and matches CFCU funds devoted to energy assistance 1:1.

³⁵ Savings are relative to non-discounted Utilities customers. Figures for MAP reflect 2019 August Year-to-Date.

Key Concerns

- MAP and IQAP can be duplicative. Staff recommended back in 2014 that the MAP program be phased out once IQAP was established.
 - Lack of auto-enroll means that applicants to IQAP must fill out another application in addition to LEAP.
 - IQAP tends to be a better rate for low income customers so many MAP customers are pushed to apply for IQAP instead.
-

MAP participants are typically identified through conversations with customers or through referrals (other customers, non-profits, etc.). CFCU does not typically conduct direct outreach for MAP, nor do they target specific individuals. There is ongoing discussion in Utilities about program redundancy for MAP, given the launch of the IQAP.

In general, the UAP team benefits from a CFCU department-wide system housed within the CFCU Customer Connections department that tracks outreach efforts in a systematic and standardized way. The department's prioritization of systematic data capture, combined with adequate documentation, ensures the UAP team uses historical and current data to identify what the program has done and benchmark against future progress.

PARTICIPATION PATTERNS

With the pilot year completed, a picture of who is participating in IQAP is beginning to emerge. However, it will take several years of data to fully understand exactly what is driving participation numbers and how individual and household characteristics (family size, geography, socio-economic factors, etc.) describe participants (see Appendix B for geographical participation patterns).

Individuals and families dealing with energy poverty fall into one or more categories, each of which are served by a specific UAP program:

- **The chronically poor, often on fixed incomes.** These individuals and families are not pushed into poverty via sudden events or macroeconomic changes but have insufficient income regardless of any complicating external circumstances (Energy Outreach Colorado Interviews, 2019). These are customers best served by the IQAP and LEAP.
- **The temporarily or suddenly poor individuals and families.** This includes those experiencing a sudden, acute economic shock. These customers are best served by the PAF.
- **Individuals managing disabilities or medical issues.** Many of these individuals and families could be served by the IQAP but are currently served by the MAP. Importantly, it is not known exactly how many people qualify for MAP but would not qualify for IQAP.

CUSTOMER AND COMMUNITY SATISFACTION

At the close of the first pilot year (2018-2019), the CFCU program manager for the IQAP ran a survey to understand the impact and satisfaction of customers participating in the inaugural IQAP program. Out of the 137 participants who filled out the survey, 42% replied with a comment specifically calling out the benefit of reduced stress or satisfaction with a lower bill. Nearly that same amount also cited the additional benefit of conservation education, a key part of the IQAP program.

42% of surveyed IQAP customers specifically called out the benefit of reduced stress and satisfaction with a lower bill.

After the completion of the pilot, additional research will be done to evaluate participant experiences. However, survey evidence suggests that respondent non-profits supporting low-income individuals and families in Fort Collins are

satisfied with the CFCU income-qualified assistance program. In part, the linking of the IQAP program with LEAP qualification means non-profit and community organizations are better able to leverage a single verification process for enrolling an individual and family into a more holistic set of services.

PROGRAM-SPECIFIC RECOMMENDATIONS

As the pilot year of IQAP ends, an upcoming review with a year's worth of data will tell a lot about how the program is functioning, who is benefitting, and where improvements may be made. Even without a complete dataset, several recommendations are outlined in this report (see the adjacent table). The recommendations include structural changes, like the elimination of the MAP program, strategic changes like the identification of goals and objectives beyond simply administering the program, and systematic improvements like an improved customer feedback survey. Assessing how many MAP customers would not qualify for IQAP should be undertaken before elimination of the MAP program. However, even if 50% didn't qualify (~80 current MAP participants), the pool is small enough for CFCU to consider 'grandfathering' any unqualified individuals into the IQAP program.

Importantly, the program management staff running the UAP program enjoy strong community collaboration and are very much admired and respected for their hard work in the community. While they may improve by standardizing and strengthening a customer feedback survey, the UAP team benefits from a department-wide system (CFCU Customer Connections) to track outreach efforts. This department infrastructure enables the team to use historical data to identify what they have done (benchmarking) and what they can do to improve (goalsetting). A 2020 outreach action plan is currently being developed. A summary of recommendations may be found in the adjacent table.

Improvement area	Notable progress	Improvement & recommendation	Recommendation rationale
Structure	IQAP was successfully launched and progressed through first pilot year.	1. Merge MAP with IQAP and remove duplication.	MAP is a small program that requires significant staff management. Alongside the IQAP it is redundant, as most users of MAP could be rolled into the IQAP and receive comparable benefits.
Strategy	Targeted marketing is occurring with LEAP (IQAP) but less for other programs (PAF, MAP).	2. Target remaining residents who participate in LEAP but not IQAP. 3. Identify and document goals and objectives.	Continuing to support LEAP participation (and thus IQAP participation) with non-profit partners, events, etc. Beyond administering the program, identify long and short-term goals, create milestones and further develop a framework to assess impact.
Systems	Successful, close working relationship with LEAP program. Customer service survey implemented.	4. Reduce re-work and redundancies in developing IQAP master-list with LEAP. 5. Formalize and standardize user-survey to track customer satisfaction.	Work with local LEAP program officers to eliminate redundancies in identifying eligible participants. For example, eliminate construction of 3 different lists between LEAP and the City to identify potential program participants. Survey used to assess participant satisfaction may be improved to provide greater insights (better questions, survey participation incentives and improved survey design) to identify what customers value in IQAP.

FINANCE REBATES: PROVIDING TAX RELIEF

HISTORY

The Financial Services Area (FSA) within the CoFC has been issuing three types of rebates to low-income Fort Collins residents since the early 1970s. These include:

- **Grocery Tax Rebate (GTR):** estimated average annual taxes paid on groceries are reimbursed. Eligibility: any income-qualified resident.
- **Property Tax Rebate (PTR):** a proportion of the amount of city property taxes obtained via property tax issuance (the majority of property tax is levied by the county) is refunded. If the eligible resident is a renter, a small proportion of annual rental payments are refunded. Eligibility: any income-qualified resident who is either age 65+ and/or is disabled or is caring for a disabled household member.
- **Utility Tax Rebate (UTR):** a portion of relevant city utility taxes (wastewater, electricity and water) paid as a part of the customer's overall utility bill are refunded. Eligibility: any income-qualified resident who is either age 65+ and/or is disabled or is caring for a disabled household member.

Collectively, the report refers to these three rebates as FSA Rebates.

OBJECTIVES AND ELIGIBILITY EVOLUTION

Ordinances establishing the provision of the PTR (1972) and the UTR (1975)³⁶ focused on two aspects of eligibility: a resident had to be both elderly and prove that they were low-income (see application in Appendix F). Over the next 30 years, there was a slight expansion of eligibility criteria when, in 1980, disabled people were added via Ordinance No. 17.

In 1985, the Ordinance for the administration of the GTR was enacted. Unlike the PTR and UTR, however, this rebate was not age restricted. Any individual or family who met the low-income criteria threshold could obtain a City rebate for estimated taxes paid on groceries. Over the years, other differences between the various Finance rebates were harmonized (for example, differing income thresholds), but age restriction remains the major difference between the GTR and the PTR/UTR today.

The income threshold for all the rebates within the FSA Rebate program is 30% of County AMI. AMI is updated annually by the County in conjunction with the federal Department of Housing and Urban Development. While AMI is a shared measurement used by LEAP/IQAP, the income threshold for FSA rebate programs (30%) is much lower than that used by UAP (60%). Ultimately this means a smaller, much more impoverished pool of participants is eligible for FSA Rebates.

Importantly, and unlike the Utilities UAP program, the Finance Department continues to verify income directly and manually³⁷.

³⁶ See Ordinance No. 17, 1980 of the Council of the City of Fort Collins. Also see Chapter 25, Article II, Division 2 of the City Code

³⁷ See Ordinance No. 17, 1980 of the Council of the City of Fort Collins. Also see Chapter 25, Article II, Division 2 of the City Code.

MANAGED AS A ‘SEASONAL’ PROGRAM

As outlined in the original PTR Ordinance in the 1970s, the PTR program in Finance still functions on a rebate ‘season,’ running from August through October. During that period, the application window is ‘open,’ meaning submitted applications must be verified, reviewed, and any deficiencies followed-up on during that three-month period. Rebates and final application decisions may be made after the October 31 deadline, depending on application volume. While the window is open, the Sales Tax Team and the Accounts Payable staff manage increased traffic at the Finance Department front desk, upwards of a 75% increase over normal volume, on top of normal workloads.

For rebate seekers, all documentation gathering must occur and a complete application must be submitted before the October 31st deadline. For staff, the application season signals a period of intense customer contact, outreach to local non-profit partners to elicit their marketing support, data input and rebate issuance (or rejection). The month(s) before/after the application window is used for data input, outreach and process improvement.

MANAGED WITH FEW/NO ADDITIONAL RESOURCES

Early in the program, the management of the FSA Rebates was done by a volunteer and later by an Executive Assistant who managed the program in addition to their full-time role. Not until the early 2010s were specific funds allocated to hire an hourly worker for three months to help process applications during the application window. Today, the program is managed by the Sales and Use Tax department in FSA, where a small but supportive staff of auditors, analysts and technicians juggle their current workloads with the rebate programs when the season occurs.

In 2019, Financial Services was successful in adding an additional permanent sales tax technician to the Revenue Department’s staff. A portion of this position (33%) will be devoted to the FSA rebate program in order to address issues of continuity and build relationships with community partners for greater rebate usage and program success.

In addition, the Sales Tax team has recently utilized the City's enterprise wide Accounts Payable Automation software to process the rebate payment requests, saving the Accounts Payable staff significant back office work. While this was a change for the Sales Tax team and illustrated further need for system improvements within the Govern, sales tax software, Sales Tax team adoption of the standard payment processing system was beneficial in that it resulted in payment tracking, eliminated duplicate entry from the accounts payable staff, and decreased the time from payment submission to printed checks.

Importantly, beyond ensuring and improving the ability to take and process applications, there has been little time allotted for FSA Rebates staff to engage in strategic planning or outreach innovation. Finance staff associated with the program have leveraged existing City programs and non-profit partners to ensure cross-promotion of the rebates, but customer-centric outreach has remained an unstaffed challenge.

PROGRAM BUDGET, OBJECTIVES, OUTREACH AND OPERATION

Operational improvements have been made by dedicated Finance staff who contribute time in addition to their normal workloads. A strategic plan linking actions (marketing, outreach, etc.) to long- and short-term goals, however, is absent. As of 2019, short-term operational and long-term strategic goals need clarification and formalization via improved documentation and socialization with staff.

Informally, the FSA Rebate program tracks an annual goal of increasing participation by 10% based on the previous year’s participation. This goal is documented via the City’s dashboard metrics. Without a strategic plan articulating actions, identifying community stakeholders, and linking actions and collaboration efforts to goals, reaching this 10% goal of increased participation has been elusive in recent years (Figure 11).

After increasing from 2011-2014, overall rebate participation has declined in the last five years, even as renewed attention has been given to marketing efforts (Figure 10).

As a result, total funds issued to residents decreased from \$276,657 in 2014 to less than \$241,762 in 2018 (Figure 10). Out of a program budget of ~\$20,000, only approximately \$5,000 is dedicated to marketing and outreach.

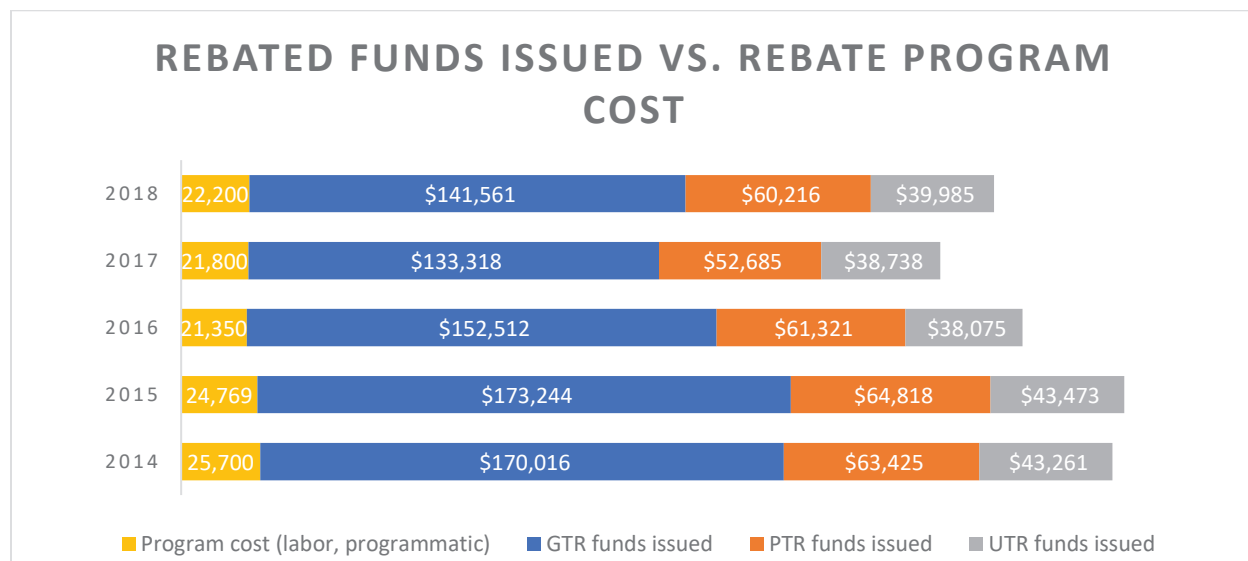


Figure 100: FSA Rebate Funds Issued vs. Program Cost

The basic operation of the FSA Rebates program is described below (see Appendix H for a rebate process map).

Tax Relief: FSA Rebates At-A-Glance

Program-wide facts

- 1172 participants in the 2018 rebate season (across rebate types)
- Approx. \$240,000 budgeted dollars for rebates.
- As of 2019, 33% of one FTE (Sales Tax Technician) is a devoted staff resource. Additional support is given in time donated by full-time, Sales Tax and other FSA staff.
- Little capacity to respond to program participation growth or engage in strategic planning, research and program development; the priority is keeping the program ‘running.’

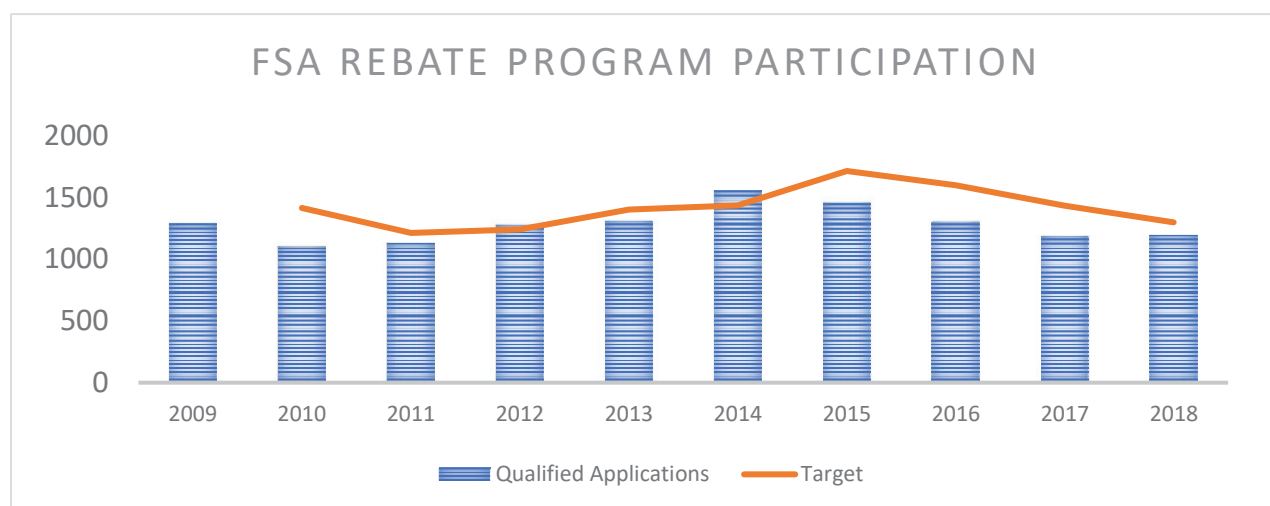
Grocery Tax Rebate (GTR)	Rebate and rebate amount:	Application Requirements
	<ul style="list-style-type: none"> • Flat refund of estimated grocery sales tax paid. Estimates are calculated annually. • Rebate of \$64/qualifying household member. • 2016 average refund: \$117 per 	<ul style="list-style-type: none"> • Proof of income less than 50% of Larimer County AMI; and, • Valid photo ID. <p>Qualification criteria</p> <ul style="list-style-type: none"> • Income;

	household application.	<ul style="list-style-type: none"> No age criteria.
Property Tax Rebate (PTR)	Rebate and rebate amount <ul style="list-style-type: none"> Reimbursement of the total City property tax paid on the property for the preceding year³⁸. If renting, 1.44% of annual rent is reimbursable. 2016 average refund: \$85 per household application. 	Application requirements <ul style="list-style-type: none"> Proof of Income less than 50% of Larimer County AMI. Valid photo ID. Qualification criteria <ul style="list-style-type: none"> Income; Elderly (65+) and/or disabled.
	Rebate and rebate amount <ul style="list-style-type: none"> Reimbursement is based on the average monthly consumption of water, wastewater, wastewater and electric services. Applicant is entitled to a refund only for actual utility services received. 2016 average refund: \$69 per household application. 	Application requirements <ul style="list-style-type: none"> Proof of Income less than 50% of Larimer County AMI. Valid photo ID. Qualification criteria <ul style="list-style-type: none"> Income; Elderly (65+) and/or disabled.

PARTICIPATION PATTERNS & CUSTOMER SATISFACTION

DECLINING PARTICIPATION DESPITE A GROWING POOL OF ELIGIBLE HOUSEHOLDS

Overall participation in the FSA Rebates program has steadily declined over the last five years (Figure 11). In 2018 there was a slight uptick, but the program has continued to serve a narrow demographic of older residents who have an average income of just over \$16,000 and small household sizes (1-2 people). Estimates from this study suggest that a growing number of poor,



³⁸ The following calculation is used to determine your property tax: Actual Value x Assessment Rate x Mill Levy / 1000 = Property Tax. Example: \$300,000 Actual Value x 7.20% Assessment Rate = \$21,600 Assessed Value \$21,600 Assessed Value x 86.49 mills/1000 = \$1,868.18 tax bill

working families are not captured in this program and that an updated understanding of the community's low-income population is necessary.

Using 2018 rebate usage data and 2016 5-year census estimates, the FSA Rebates program was estimated to have reached 10-13% of eligible households (7,534 – 10,460 households) (see Figure 2).

Based on an analysis of participant data, the characteristics of an individual or family leveraging the City's FSA Rebates program are as follows:

1. **In general, the smaller the household size, the older the applicant. The inverse is also true: the larger the household size, the younger the applicant.**
2. **Most applicants are seniors in their mid-sixties (median age across household sizes is 64).**
3. Most applicants come from **small household sizes of 1-2 people** (Figure 15).
4. **Median age for an applicant with three or more people in their household skews younger... much younger** (median age is ~40).
5. **Very low-income.** Across household sizes and over the last five years, a typical applicant had an income of approximately \$15,300 (median) per household. For a household of 4, a typical applicant had a median income of \$20,722 (86% of Federal Poverty Level).

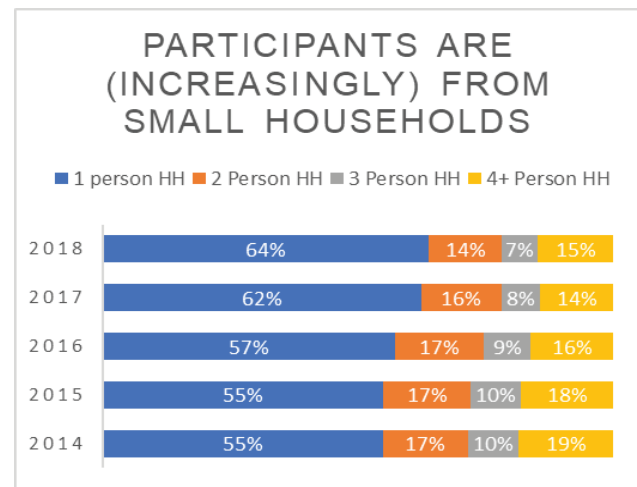


Figure 12: FSA Rebates and household size

GEOGRAPHIC AND RESIDENCE-TYPE DIVERSITY

Spatial mapping of participants in the FSA Rebates programs shows wide participation across the city (see Appendix G). The top 10 addresses used by an applicant only account for 12% of rebates given over the last five years and typically are characterized as age-restricted locations or mobile home communities. Beyond the top 10, all remaining applicant addresses identified in the usage data each account for less than 1%. This suggests wide and diverse applicants among individual single-family homes, apartment complexes and manufactured/mobile home parks.

The top five addresses utilizing the FSA Rebates program include the following residential areas:

1. 3.3%: North College Manufactured Housing Community. Age-restricted (55+ and older) mobile home park.
2. 1.3% Woodbridge Senior Apartments (age restricted).
3. 1.3%: Hickory Village, mobile home park.
4. 1.1%: West Mulberry mobile Home Park.
5. 1.1% Harmony Village at Harmony Park mobile home park.

COMMUNITY/CUSTOMER SATISFACTION

The Evaluation Team reached out to 25 well-known local non-profit and community partners to gauge their awareness and direct support of the FSA Rebates program. The survey was taken by staff at Colorado State University (CSU), UC Health (Community Health Improvement Program, Healthy Kids Club and other regional programs), Project Self Sufficiency, The Family Center, Volunteer Income Tax Assistance (VITA) program, the Food Bank of Larimer County and Energy Outreach Colorado. Additional focus groups and interviews were also granted by five non-profit and community partners, including the Larimer County Human Services Department and the state of Colorado Low-income Energy Assistance Program (LEAP).

Nearly 80% of respondents indicated that the clients they served were low-income, with ~70% being families. While over 90% of the respondents knew about the City's efforts to reduce utility costs for low-income families (i.e., the IQAP program), more than 75% weren't aware of the tax rebate programs run out of FSA (Figure 13).

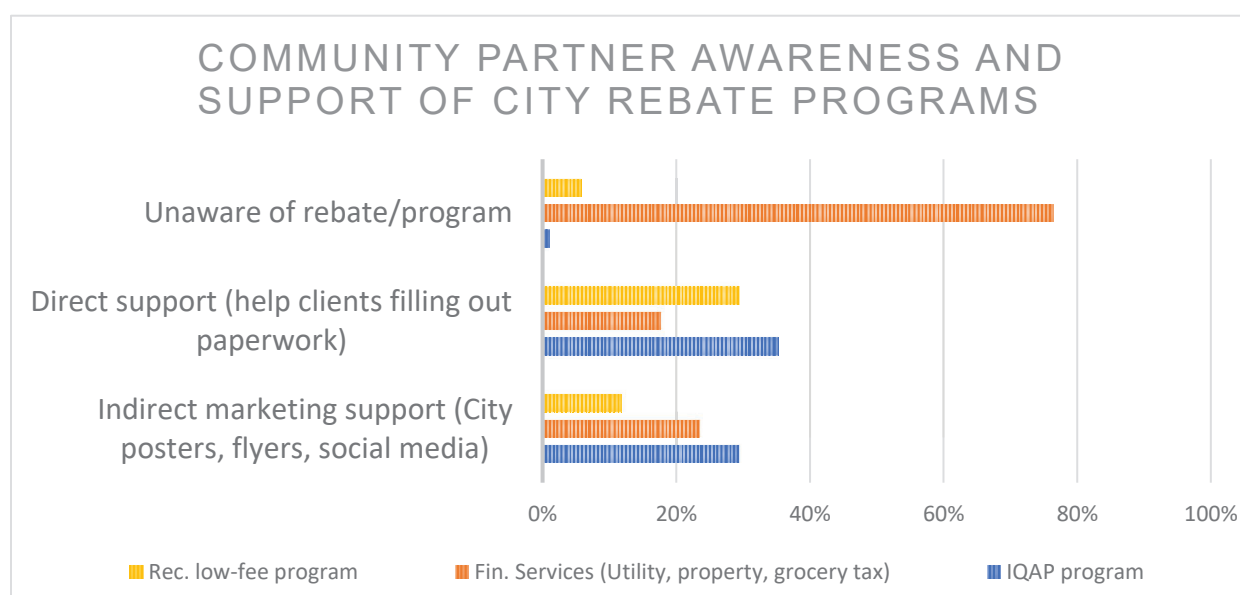


Figure 13: Community Partner Awareness

Possible reasons for lack of awareness on behalf of non-profit partners include staff turnover at the non-profits as well as a lack of continuity and poor relationship-building given FSA program management via a seasonal employee. To be sure, the Finance Department isn't alone in not fully leveraging community service providers: none of the rebate programs evaluated had more than 50% of the non-profits and community partners we surveyed for this report actively supporting City rebate/reduced-fee programs, either directly (by supporting low-income clients to fill out applications) or indirectly (via marketing like posters or flyers, or social media mentions).

AN INCOMPLETE SOLUTION: THE ONLINE APPLICATION SYSTEM

In response to a 2017 Council request—which occurred with no additional budget or resources—FSA staff was asked to make an online application option available to low-income residents. FSA staff worked to make an online application available with the tools and technology available within the department. This meant that FSA staff had to design within systems that were not at all intended to be user friendly, an external facing application

management tool. Users and staff alike found this work-around to be a challenge and have suggested requesting additional funding for a well-designed application management system.

Originally, the objectives of utilizing an online application opportunity included:

- For the City, less time spent doing ‘re-work’ for missing/incomplete applications.
- For applicants, no need to make a special trip to City offices, greater flexibility to submit a complete application at their convenience.

In the 2018 and 2019 rebate seasons, only approximately 10% of all applications were submitted online. For staff, the online FSA Rebates application (designed within the existing Govern platform used, among other things, for sales tax management) has generated significant issues. For example, the improvised online system does not adequately coordinate documents and typically requires staff to do a lot of re-work to track down missing application components.

Moreover, when an applicant successfully identifies the online application portal, the directions posted are confusing and s/he must navigate equally confusing questions about applicable file types accepted and required documentation.

PROGRAM-SPECIFIC RECOMMENDATIONS

The UTR, GTR and STR, which together make up the FSA Rebates program, have never been reviewed or evaluated—though various improvements to the original ordinances have occurred (e.g., the inclusion of ‘disabled individuals’ as a part of the target group in the 1980s, etc.). With a partially dedicated FTE, the FSA Rebates program could benefit from improved service continuity, non-profit relationship management, and strategic objective development. Of course, this will depend on how much time is actually allocated to the FSA Rebates program, given the heavy workload of the Sales and Use Tax team. Strategic planning and clear goal definition will help deduce what is required for FSA Rebate program success in terms of staff time, roles and responsibilities.

In contrast to the use of a seasonal contractor (for 4 months, 33% of the time over a year), a year-round salaried FTE will devote the equivalent amount of time in combination with duties as a Sales Tax Technician. Notably, this is thus not net increase in staff capacity (as there is still only 33% of a FTE devoted), but this FTE does address the continuity issue of service provision and relationship management. By contrast, an *additional* resource could help manage and

Resourcing constraints:

In 2020, a newly created Sales and Use Tax Technician position will address a backlog of sales tax related duties and spend 33% of their time on the FSA Rebates program. The ability for this person to manage program participation growth, however, is unlikely.

accelerate program participation, should that be illuminated as a Council priority.

Regardless of the objectives around program participation growth and adequate resource allocation, the long-term use of a seasonal contractor has had consequences. It is one reason why the wider community (as identified in surveys and interviews with nonprofit partners) has little understanding of program’s operation and why the installment of a permanent staffer to field questions, build

relationships, and maintain overall continuity is so important. Moving forward, these non-profit partnerships will remain essential for successful municipal low-income programming, as low-income populations are not only logistically difficult to reach but expensive for cities to adequately to reach on their own.

Reducing age-specific criteria for the PTR could expand eligibility for the families already accessing the GTR, but currently unqualified for the PTR. The combination of the PTR + GTR may financially incentivize low-income residents to apply for the FSA Rebates, despite the work and coordination required (e.g., arranging childcare, transportation, etc.) for these households to submit applications in-person to the City.

Combining the PTR with the GTR also achieves the following:

- **Reduces staff burden and operational costs.** Managing and monitoring divergent participation criteria for different Finance rebates is a ‘heavy lift’ for an already under-resourced program.
- **Ensures equity, targets the neediest.** When the age criteria were adopted for the PTR/UTR in the 1970s/1980s, it is probable seniors were a population with a high—perhaps the highest—likelihood of poverty. Today however, the most impoverished people in Fort Collins are women, including adult women between ages 35-54 and senior women over age 55 (see discussion on pages 14-17). Though seniors still represent a vulnerable population, Fort Collins today clearly has a high proportion of working families and adults in poverty. With stagnating usage of the PTR, extending PTR to cover more people who need it, would achieve participation increase objectives.
- **More money into the hands of low-income people, especially families.** A female-headed household is more than 25% more likely to experience poverty with significant lifelong impacts for children. Research shows incremental household funds typically go to benefit children, and that interventions that benefit children have long-term positive effects on economies and societies.³⁹

Eliminating the UTR has positive benefits for the City, the FSA, the IQAP program and low-income customers. Verifying CFCU customer status between CFCU and FSA is a lengthy and burdensome process for staff. Directing interested customers to the IQAP/LEAP program instead, could better utilize an existing City service and strengthen a state-wide program (i.e., LEAP). For low-income customers, attaining a long-term solution—a permanently lower utility rate—is almost certainly preferable to an annual cash rebate.

Eliminating the UTR could also reduce a portion of the administrative burden of the FSA Rebates program and free up time and resources for the important—but currently not completed—marketing and relationship-building work that needs to be undertaken for the GTR/PTR rebates.

FSA Rebate program staff should also consider how to identify and obtain resources for improving the online application system. Knowing that low-income families are constrained by transportation, childcare and other costs, an online application means that low-income people working multiple jobs and managing the high costs of city living are able to submit applications in a time and manner convenient for them. A summary of recommendations may be found in the adjacent table.

³⁹ UNICEF (2019). https://www.unicef.org/socialpolicy/index_53294.html Accompanying report: https://www.unicef.org/socialpolicy/files/Investing_in_Children_19June2012_e-version_FINAL.pdf

Component	Notable Progress	Improvement & recommendation	Recommendation rationale
Structure	Dedicated FTE was resourced to the project in fall 2019.	<ul style="list-style-type: none"> (1) Ensure adequate FTE coverage of the FSA rebate program. (2) Merge GTR and PTR into a single rebate by removing age-specific criteria of PTR. (3) Eliminate UTR in lieu of pushing participants towards CFCU IQAP program⁴⁰. 	<p>With a new 2019 FTE spending 33% of their time on the FSA Rebates program, FSA has made progress toward service continuity. However, should Council prioritize program growth, adequate resourcing should be considered.</p> <p>Merging the GTR and PTR streamlines and creates value in the following ways:</p> <ul style="list-style-type: none"> a. Reduces staff burden and operational costs. b. Ensures equity, targets the neediest. c. Puts more money into the hands of low-income families.
Strategy	Pending prioritization from the Sales Tax office and workload, the dedicated FTE resource in Sales Tax may be able to devote time to strategic planning.	<ul style="list-style-type: none"> (4) Identify and document goals and objectives of FSA Rebate program. (5) Standardize customer service feedback opportunities. (6) Increase marketing/outreach efforts. 	<p>Beyond simply administering a program, identify long and short-term goals, create milestones and further develop a framework for assessing impact.</p> <p>Adequate customer feedback is not currently obtained for assessing satisfaction and opportunities for design and process improvement. Budget and staff time is not optimized to meet outreach needs.</p>
Systems	Appeals to Council and clarification of ordinances have previously been made to include new vulnerable groups (e.g., disabled people).	<ul style="list-style-type: none"> (7) Make application year-round. (8) Provide resources to improve online application option. (9) Consider ways to eliminate income verification. 	<p>In contrast to other city programs, the FSA Rebate program still operates as a seasonal program, in part because it is under-resourced to grow program participation. Seasonal programs are challenging for applicants who must juggle yet another benefit timeline.</p> <p>The current online application option has not been designed-for, nor created with, actual users. It's not only difficult to use, but typically requires additional work for staff to track down missing application components.</p> <p>Income verification is an extremely burdensome step for City staff; time could be better spent on targeted marketing and customer engagement⁴¹.</p>

⁴⁰ GTR participants are the largest group of Financial Services Rebate users. UTR rebate users, if they do not qualify via LEAP, could possibly be grandfathered into the UAP program.

⁴¹ The UAP program eliminated income verification by accepting LEAP enrollment (whereby income is verified by a state-funded program) in lieu of UAP-specific program income verification.

RECREATION REDUCED-FEE PROGRAM: IMPROVING QUALITY OF LIFE

HISTORY

The Recreation department in the CoFC has provided a low-income rate for use of facilities and/or classes since at least the early '90s. The Evaluation Team found little historical documentation about the department's or City's approach to providing low-income recreation programming prior to a 1992 Ordinance⁴² that outlined the rate at which discounts would be applied. That Ordinance reads:

"...a fee reduction for designated low-income people will receive a discount equivalent to 1/3 of the published fee for a City-offered sports, drop-in recreation, wellness, or arts and crafts programs." –Resolution 91-156

In 2016, however, opportunities for low-income families and individuals were reviewed by Recreation staff⁴³. A department-wide team (Reduced-Fee Action Team) gathered throughout 2016-2017 to consider how to better serve low-income populations by focusing on⁴⁴:

1. Financial and eligibility barriers for low-income residents
2. The application process (simplification for applicants and department administration)
3. Marketing, awareness and streamlined communications

2017 REVISIONING

The Reduced-Fee Action Team's review included community outreach and a citizen survey in addition to benchmarking. The team also reviewed Recreation's fee structure, conducted outreach directly with the community and consulted with community partners like the Poudre School District and various non-profits about what a new reduced-fee program might include.

The three phases of the outreach review included (1) research, participant feedback analysis and needs establishment, (2) visits with boards and City departments to discuss proposed changes and (3) direct community outreach. The latter included a 10-question survey for community members interested in a revision of the reduced-fee program⁴⁵.

As part of the research phase, a peer-city review was completed. The Action Team reached out to in-state cities like Longmont, Windsor, Thornton, Greeley and Westminster, in addition to other U.S. cities including Lincoln, Burbank, Ann Arbor, Provo, and Boise. The Action Team's findings illuminated 'both consistencies and inconsistencies between Fort Collins and other communities offering a reduced-fee recreation program for low-income residents⁴⁶.

In addition to hosting focus groups and open houses, an outreach survey was extended by the Recreation Department. It received over 200 responses. Respondents indicated strong support for an online reduced-fee program application and registration, year-round application acceptance, and possible changes to program costs. At the time, the community indicated popular support for both the existence of the program and the revisioning effort.

⁴² Resolution 91-156, "Cultural, Library and Recreational Services Fes and Charges Schedule."

⁴³ Recreation Department Reduced-fee Program and Proposed Updates

⁴⁴ Recreation Department 'Reduced-Fee Action Team.' First meeting agenda from 11/14/2016

⁴⁵ 2017 Report for Recreation Reduced-fee Program Survey

⁴⁶ The Evaluation Team did not review this peer-review report or the accompanying analysis.

The Action Team’s recommendations were addressed and implemented in the fall of 2017. Changes to Recreation rates are outlined in the chart below. Fee discounts for recreation programs are now available to all permanent residents who demonstrate a financial need, regardless of age or ability. If a student within Poudre School District (PSD) qualifies for free or reduced lunch benefits, that student’s family also qualifies for the reduced-fee recreation program with submission of a letter of free-and-reduced lunch status.

Change Type	Prior Approach	2017 Changes
<i>Discount rates⁴⁷</i>	<ul style="list-style-type: none"> • Individual pass: \$25 per 6 months • Child pass cost: \$6 per 6 months 	<ul style="list-style-type: none"> • Individual adult pass: \$25, per year • Individual youth/60+ senior pass: \$6 per year • Family/couple pass: \$40 per unit, unlimited kids, per year
<i>What’s discounted</i>	<ul style="list-style-type: none"> • Drop-in rate for facilities (unlimited) • Fitness class discount: Adult, 50%. Senior, Youth, Adaptive Recreation, 90% • Adult activity: 50% discount, 4 per year • Youth activity: 100% discount, 4 per year 	<ul style="list-style-type: none"> • Drop-in rate for facilities (unlimited) • Fitness class discount: 70% for all classes • Tiered class and activities discounts. Community/team-based sports programs discounted at a higher rate (introductory soccer, group swimming) than advanced, individualized programs (e.g., private lessons) • No limit on programs/classes discounted per year • A separate pass for Adaptive Recreation users was eliminated in favor of using a single “reduced-fee” pass type
<i>Application window</i>	Every 6 months must renew	Membership good for one-year

⁴⁷ Standard fee schedule for an annual pass as of Jan. 2020 is the following: \$207/youth; \$306/adult; \$207/senior; \$495/family or couple. <https://www.fcgov.com/recreation/recpass>

Additional Recreation reduced-fee program changes are outlined in the next chart, accompanied by their current status. In 2019, additional improvements were made in collaboration with the City's process improvement team (FC Lean), specifically around improving and simplifying the application document.

2017 Reduced-Fee Action Team recommendation	Implementation Progress as of 2019	Notes
<i>Development of an online application process</i>	Partially completed	Enrollment in programs can occur online, but only after a reduced-fee application has been submitted (verification and submission must happen in person). Online application submission has not been completed.
<i>Tiered discounts based on levels of proficiency (introductory, intermediate and advanced)</i>	Completed	See information on previous page.
<i>Unlimited enrollment in all recreation programs (no longer capped at 4 per year)</i>	Completed	See information on previous page.
<i>Simplified application, year-round application acceptance</i>	Completed	Applications are now accepted year-round. The new application is shorter (2 pages versus 5 pages) with focused, streamlined information. It also provides information on what benefits are included. The new application was published on November 1, 2019.
<i>Reduced-fee program communications and awareness plan</i>	Not completed	Recreation staff have not yet developed a communications plan specific to the reduced-fee recreation program.
<i>Purchase of a (discounted) drop-in pass is required for benefits to be activated</i>	Completed	See information on previous page.

CURRENT PROGRAM

GOALS AND OBJECTIVES

The revised reduced-fee recreation program is underpinned by a vision to make recreation opportunities available to diverse and disadvantaged communities across Fort Collins. This includes children and their families who qualify based on PSD's free/reduced lunch, even if that child lives outside of Fort Collins city limits⁴⁸.

While short-term operational goals for the revised program have been enumerated, long-term strategic goals (e.g., what percent of disadvantaged communities should be reached?) were not articulated. In a 2019 memo to Executive Leadership⁴⁹, the stated goals included:

- Simplify Reduced-fee Program application and registration process (the online application / registration option).
- Simplify Reduced-fee Program application process (offerings, process improvements).
- Simplify Reduced-fee program administration (generate consistencies in discounting programs).
- Simplify approval/eligibility period.

These 2019 goals clarify how to improve the program's efficiency. They are operational, not strategic goals. Strategic goals give direction and estimate the type and degree of impact expected and desired. Strategic goals support a vision and are measurable, usually with one or two major indicators. While operational goals ask "how" work gets done, strategic goals answer "what" is being accomplished. The current Recreation reduced-fee program, like the UAP and FSA Rebates, lacks strategic goals.

Recreation Reduced-Fee Program At-A-Glance

Program-wide facts

- 5,130 applicants were approved in 2018 for a reduced-fee pass
- \$190,000 was approved for reduced-fee scholarships for youth in 2018
- \$24,837 was approved for reduced-fee discounts for adult enrollments
- Reduced-fee pass holders visited recreation facilities over 35,000 times in 2018

Rebate and rebate amount

Recreation pass: Drop in pass is \$25 (individual), \$6 senior/youth, \$40 (family). Pass includes:

- Fitness class discount: 70% for all classes.
- Discounts are tiered for classes and activities.

Application Requirements

- 185% FPL or verification via enrollment in a state/federal assistance program including Free/Reduced Lunch program through PSD,
- Valid photo ID for any applicant/member over 18,
- Proof of residency, and
- Completed application (Appendix K).

⁴⁸ Evaluation interviews with Recreation Dept. staff, 2019.

⁴⁹ Executive Leadership Memo dated February 28, 2019, to Darin Atteberry, City Manager, from Bob Adams, Recreation Director.

APPLICATION MANAGEMENT AND ONLINE ACCESS

A new application was developed in conjunction with the process improvement team (FC Lean) in 2019. This shorter, simplified application was released for public use in November 2019. Since 2017, applicants are still required to submit their application in person (or by mail) along with documentation confirming residency, lawful presence in the United States and income. An online application process whereby the applicant submits materials that are verified fully online, is not currently available. Required application documents include:

- **Identification.** Legally recognized driver's license, military ID., etc.
- **Residency.** Residency proof including a Fort Collins utility bill or three pieces of official mail, to the applicant at a City of Fort Collins address.
- **Proof of income eligibility using 185% of FPL.** Applicants must show income (tax returns) under 185% of FPL, or PSD reduced/free lunch eligibility, or enrollment in state or federal assistance program (e.g., Medicare, WIC, Social Security).⁵⁰

In 2017, a resource guide was given to front desk recreation staff at various recreation facilities to help staff assess acceptable income verification documents for a reduced-fee membership. Required documentation for enrollment is extensive.

Reduced-fee applications are processed manually (Figure 14). Importantly, the documents required for an application are not only numerous, but also require disclosure of an applicant's personal and private information. An application managed as shown below takes between 7-10 business days to complete (see Appendix I for full program process map).

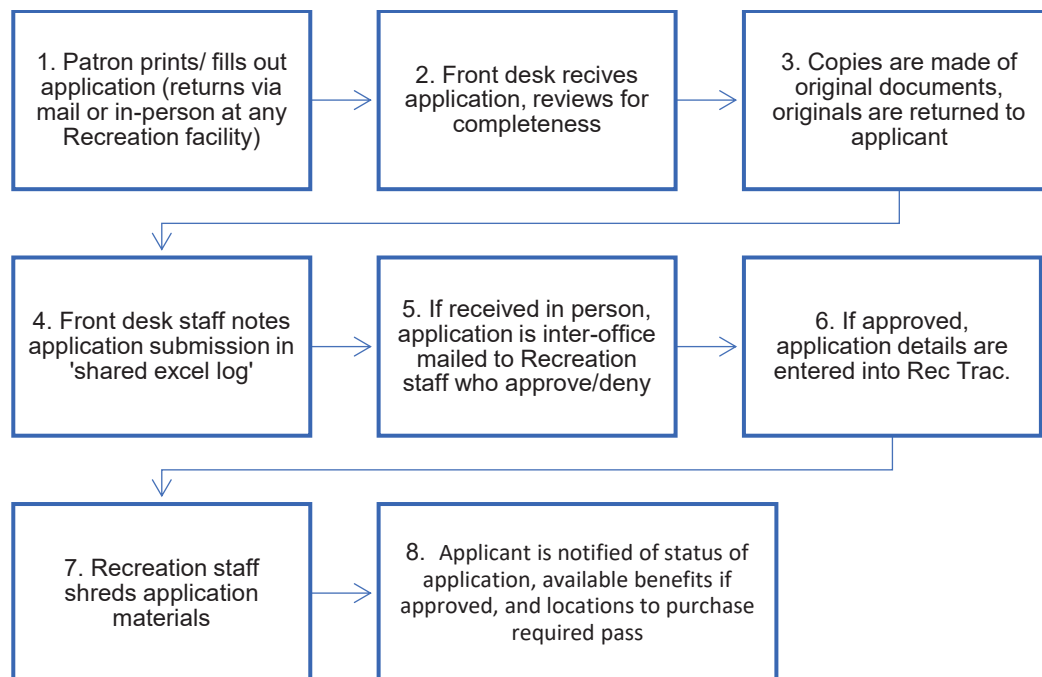


Figure 14: Recreation Reduced-fee program application flow

Once an individual or family is signed up with a reduced-fee pass, online registration for specific classes or programs occurs easily via the Recreator portal.

⁵⁰ 185% FPL in 2018 was equivalent to a maximum income of \$47,638 for a family of 4 or a maximum income of \$23,107 for a single individual.

In its review of the application process, the Evaluation Team noted a patchwork of systems used by staff to get application documents routed and ultimately approved by assigned Recreation staff. These include interoffice mail and notations made in online shared documents. The Evaluation Team was unable to verify how and when application documents are shredded. Without a formalized, secure system in place, the Evaluation team noted there is opportunity for sensitive applicant information to be copied, lost or misused.

COMMUNICATION AWARENESS PLAN AND OUTREACH

There is no marketing plan nor marketing efforts specifically targeted for the Reduced-Fee Recreation program outside of general Recreation marketing. This includes marketing (advertisements) in the *Recreator*, a comprehensive community resource guide that offers information on the City of Fort Collins' Recreation facilities, classes, programs, events and overall community activities. It is published quarterly. Information on the reduced-fee program may also be obtained on the department website.

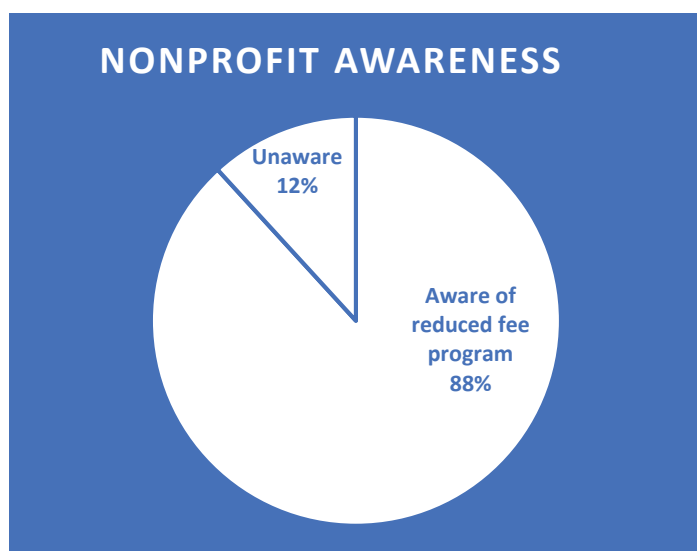


Figure 15: Reduced-fee Recreation Program: Community/nonprofit awareness

To communicate the reduced-fee program the Recreation Department depends on grassroots outreach via community partners like Sava, the Murphy Center, Columbine Health, and Title I⁵¹ schools with Poudre School District (PSD). Staff members at the Northside Aztlan Center occasionally do outreach directly with these organizations on the reduced-fee program.

A survey extended for the purposes of this evaluation asked 17 individuals from nine of the major non-profits in town about their awareness of the reduced-fee recreation program. Over 80% indicated some level of familiarity, suggesting successful external partner engagement (Figure 15).

PROGRAM BUDGET, OBJECTIVES, OUTREACH AND OPERATION

The reduced-fee program is managed without dedicated resources. Responsibility is shared among multiple hourly staff at the front desk as well as salaried full-time employees (a Business Support Specialist III, a Financial Analyst II, Supervisors, etc.) who take on this work as part of their wider Recreation Department duties.

BUDGET

The reduced-fee program is not managed as a clearly delineated program with fully dedicated program staff, a clearly defined budget and a scope of work unique to that program. Tasks associated with management of the reduced-fee program are diffused into the workloads of various recreation staff.

⁵¹ Title 1 schools are those known to have high concentrations of low-income students. With this designation, a Title 1 school can receive additional federal funding for providing services to low income students.

Without a delineated budget, for purposes of this evaluation study, the Recreation staff and the evaluation team attempted to reverse-engineer a budget based on associated personnel costs and programmatic (material-related) costs (see adjacent table).

	2019 FTE	2019 Actual Costs
Personnel	0.6 (spread over 5 people)	\$79,600
Programmatic		\$4,305
Annual program spending in 2019		\$83,905

Annual revenue increases (losses) due to the existence of the program were not estimated for the following reason: it is unknown how many low-income individuals would have bought a reduced-fee pass without the discount. For the number who would have bought a pass even without a discount, there exists a revenue loss. For those that would not have bought a pass without a discount, there exists an argument for a revenue gain. The exact proportion of each is unknown, though with more research

some estimates could reasonably be made.

PARTICIPATION PATTERNS & CUSTOMER SATISFACTION

Participation in the reduced-fee program has swelled from 4,402 in 2014 to more than 5,000 individual participants in 2018. The five-year average between 2014-2018 is 4,880 total participants. A primary applicant is an adult applicant who signs up themselves or themselves plus a family, for participation in the program. In 2018, 2,349 primary applicants (i.e., household units) were enrolled in the reduced-fee program.

Specific characteristics of an individual or family leveraging the City’s program are as follows:

1. **They are mostly families.** More than 80% of primary applicants sign up 2+ people.
2. **Primary applicants are mostly women.** Over 70% of primary applicants are women.
3. **Women typically sign up bigger families.** The average size of a reduced-fee family is 3 people. When the primary applicant is a female, the average family size increases to 4 people.
4. **Adults (ages 19-59 years) are shrinking as a user base.** This age demographic shrank by approximately 10% over the last five years (Figure 16)
5. **Senior participation is growing.** As a proportion of the larger pool of participants, senior-aged users have steadily grown from 3% (2014) to more than 5% (2018)
6. **Seniors experience high enrollment turnover.** Over 80% of seniors participating in a given year obtained their pass in the prior 1-2 years.

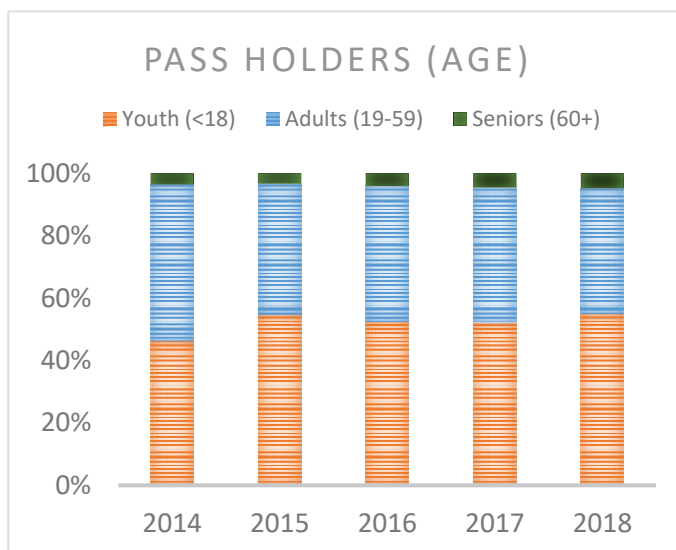


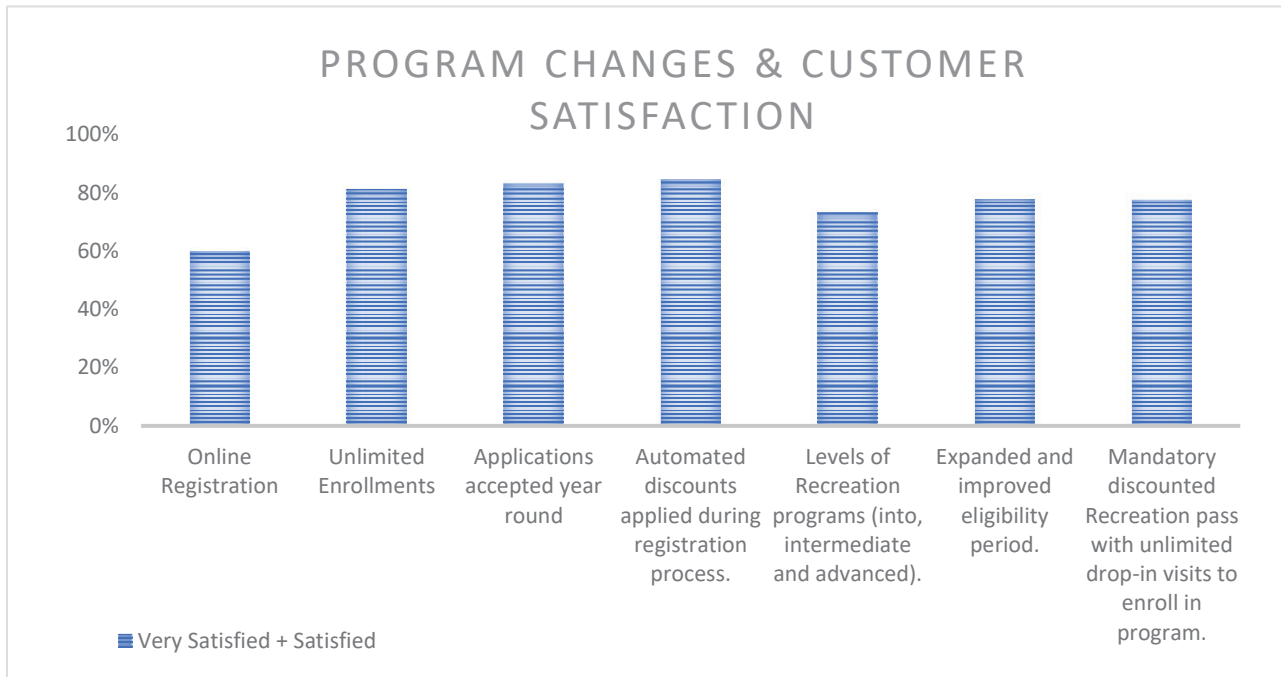
Figure 16: Average age of reduced-fee pass holders

Less than 9% have had a pass for three years or longer.

7. **High turnover suggests a dynamic user base.** Annually, close to 50% of patrons did not have a pass the prior year.

Mapping the location of reduced-fee pass holders suggests that the program is widespread around the City, including in areas that are outside the City boundaries but within PSD. The north and northwest corner of the city have the highest concentration of reduced-fee pass holders (Appendix J).

In March of 2019, the recreation department extended a customer satisfaction survey (n=130) and identified that Reduced-fee program changes were supported by the community members surveyed (Figure 17).



PROGRAM-SPECIFIC RECOMMENDATIONS

The reduced-fee program has been successfully integrated into all Recreation department functions and there is significant program support and familiarity within the community and among community partners. Compared to the other evaluated City Rebate programs, the reduced-fee program serves a large number of low-income people—especially families—each year. The program has taken important steps to improve the application process and offer access to recreation opportunities for the range of individuals and families that live in Fort Collins. Notably, the application has just benefitted from a FC Lean intervention, which cut the application down from five pages to one (Appendix K). The application now is simpler to understand and expedites completion, design factors that are known to be of great importance for low-income customers.

Broadly, the Recreation reduced-fee program would benefit from balancing a strong focus on operational improvement with a focus on long-term strategic impact. What does the recreation program seek to accomplish in the long term? Are short-term operational changes working in tandem with that larger vision and with articulated strategic goals? As of now, a strategy guiding operational action is missing.

Part of the imbalance between strategic and operational goals is the fact that the reduced-fee program is not thought of as ‘traditional’ program, i.e., a standalone program with a dedicated program manager, a specific communications plan, etc. The reduced-fee program is ‘everyone’s’ job in Recreation, which means that targeted communications and specific responsibilities for this program’s success lie with everybody, but also with no one in particular. High-level questions about program effectiveness often don’t land squarely in any staff member’s workplan. Establishing clear ownership and milestones around who (or what department) is responsible for program growth and development may lead to programmatic improvements.

Finally, various systematic improvements could help with city-wide rebate alignment and customer-centric security. Strengthening the application systems that handle sensitive information and working toward a centralized city-wide approach could decrease the data privacy risk and reduce the burden on Recreation staff as well as other relevant service areas like the FSA. With a standardization of low-income eligibility criteria and use of a common application across the City, an alignment of rebate programs may be achieved. In the meantime, Recreation may consider steps to align with other city rebate/reduced-fee programs that use AMI for the income threshold (like UAP/LEAP and FSA Rebates), instead of 185% FPL.

Improvement area	Notable Progress	Improvement & recommendation	Recommendation rationale
<p>Strategy</p>	<p>The program reaches a significant number of low-income households.</p> <p>A strong collaboration with the PSD has contributed to high levels of participation from families.</p>	<p>(1) Balance the operational focus by articulating a long-term, strategic plan.</p> <p>(2) Design and execute a communications plan, include outreach goals and key partners.</p>	<p>Beyond goals around program administration and operations, there are not clearly articulated strategic goals. What's the long-term objective of the program? What is the program trying to accomplish? How are operational goals in service to long-term goal(s)?</p> <p>Let data insights guide goals and inform long-term and short-term targets. For example, a goal might be to target adults (ages 19-59), given that this user group is shrinking. Develop new operational goals once previous operational goals (e.g., providing a year-round application window) are accomplished.</p> <p>Complete work of establishing and executing marketing/communications plan.</p>
<p>Staff & structure</p>	<p>Front desk staff at any recreation center are able to accept applications.</p>	<p>(3) Identify program ownership, program boundaries.</p>	<p>Specific operational tasks are absorbed into duties of multiple staff making accountability and leadership difficult. Who is responsible for managing the program? Clarify which staff are charged with various tasks, including marketing/relationship management within the community.</p>
<p>Systems</p>	<p>Revised application in 2019 simplified application steps and made process much easier to understand.</p>	<p>(4) Strengthen systems handling sensitive application materials.</p> <p>(5) Provide online application option.</p> <p>(6) Align eligibility criteria with City Rebates programs, using AMI instead of FPL.</p>	<p>A single, City-wide income-eligibility application could eliminate the burden of income verification for front desk Recreation staff while improving security. Inter-office transfer of copies of sensitive documents among staff poses risks for resident privacy.</p> <p>Complete work of providing an online application option.</p> <p>Measure poverty using a locally appropriate measure (% of AMI) consistent with other City rebate programs.</p>



PART 2: CITY-WIDE FINDINGS & RECOMMENDATIONS

CITY-WIDE FINDINGS AND RECOMMENDATIONS

For City rebates and reduced-fee programs, each department has worked to optimize its program given available resources. However, lack of centralization between these different Service Areas/departments has led to different approaches, including different methods for leveraging community partners, variable eligibility thresholds affecting participation, and differing levels of staff/programmatic resources available for program deployment. As a result, our analysis suggests that each department that manages a reduced-fee/rebate program has reached slightly—or in some cases very— different low-income populations. Diversified approaches have also led to diffused impact, with several rebate/reduced-fee programs functioning for decades but only reaching one out of three low-income households in 2018.

Some program cross-marketing opportunities have been encouraged: for example, a comprehensive, citizen-facing list of discount, rebate and service programs for low-income individuals and families was developed and posted online in 2018⁵². However, no substantial programmatic changes in eligibility, program design, resource allocation (dedicated FTE, programmatic funding), application centralization or broader outreach efforts have been made across the programs⁵³. For applicants, this means an individual or family must submit a different application with different required documents for each program and do so within each program's unique timetable.

ONLY HALF OF LOW-INCOME PEOPLE PARTICIPATE IN ONE CITY REBATE/REDUCED-FEE PROGRAM

Estimating the number of low-income individuals in Fort Collins is a challenge. A suite of poverty statistics captures different aspects of poverty, most of them outlining different and often confusing income thresholds depending on different household size, respondent age or household composition (e.g., a 'family' versus a 'household' versus a 'mix' versus a 'single' individual). Moreover, the existence of a large local student population further complicates the picture.

Using application data from each of the three departments and controlling for estimated overlaps between programs (around 18%), the Recreation Reduced-fee program reaches the highest proportion of the City's low-income people, followed by the FSA Rebates, followed by the UAP. Note that the population of the biggest component of the UAP, the IQAP program, is bounded by eligibility for state-wide LEAP. **Less than half of all estimated low-income households are currently not participating by one of the City of Fort Collins reduced-fee/rebate programs evaluated (Figure 18).**

⁵² See Discount Programs, Rebates and Services web page at fcgov.com:

<https://www.fcgov.com/socialsustainability/discounts.php>

⁵³ The Low-income Application Working Group, with City staffers from Sustainability Services, Recreation, Utilities, City Managers Office and Planning, Development and Transportation (PDT) have been meeting and working to coordinate marketing efforts (online and paper materials) and share information 2018.

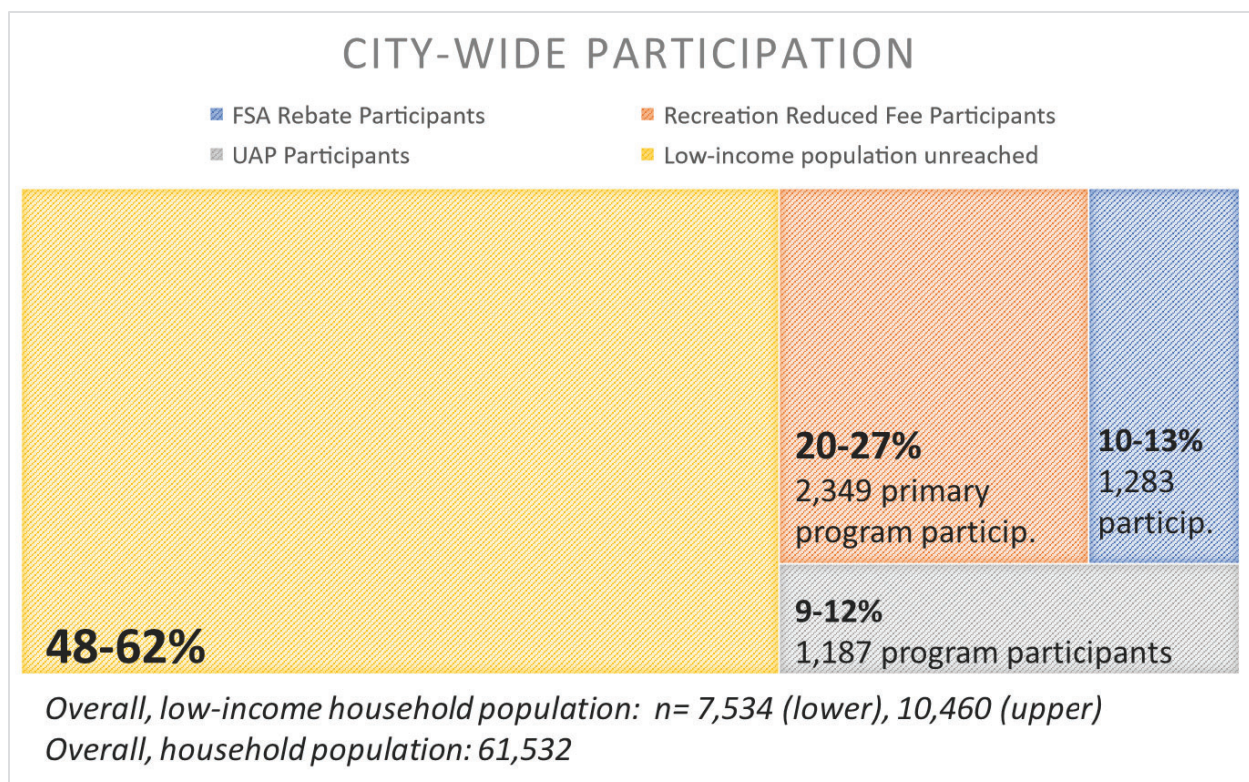


Figure 18: Community-wide participation in income-qualified city programming

An important factor in understanding city-wide rebate and reduced-fee program performance is to understand participation depth: in other words, do qualifying individuals and families participate in only one reduced-fee/rebate program, or, do they take advantage of the multiple rebate and reduced-fee programs offered across the City? Essentially, how well do these programs perform together as a portfolio? Assessing participation depth may illuminate how well-integrated these programs are (or are not). It may also suggest if City resources—including outreach efforts—may be better leveraged between programs.

Analyzing participation patterns in the available data presents opportunities and challenges. Because the programs are managed independently, each program retains its own unique data collection approach and utilizes a unique system for data management. Recreation uses RecTraq and a combination of excel spreadsheets; the FSA Rebates program manages information via the Govern system; and Utilities IQAP participation data is stored both within the LEAP program database and the CFCU customer database. Without a common, city-wide customer relationship management (CRM) system, tracking an individual resident or household with a unique ID number is impossible.

For the five-year period between 2014-2018, this evaluation matched 3,003 valid addresses to an accepted application for one of the three evaluated City rebate/reduced-fee programs (IQAP, Finance Rebates, and Recreation Reduced-fee passes)⁵⁴. Within this pool, only 18% had participated in more than one rebate/reduced-fee program. Put another way, 82% of application addresses were included because of participation in only one City rebate/reduced-fee program.

⁵⁴ Aggregating based on first and/or last names is unreliable for a number of reasons (e.g., name duplications, data entry misspellings, under/overcounting when individuals sign up a household for benefits). However crude, applicant addresses are used to track participation across City rebate/reduced-fee programs, although the merging of datasets is time-consuming and not without drawbacks.

Notably, 3,003 addresses do not equate to 3,003 households or individual participants. An address may designate an apartment complex or mobile home park with many rebate/reduced-fee participants living there.

As previously mentioned, low-income people have different resources and different decision-making capacities than their non-poor counterparts, they represent a unique service group for obtaining government services and participating in government programs. When government programs are designed without deep understanding of the poverty context (i.e., how low-income people make decisions, what resources they do/don't have available, etc.) poverty alleviation programs risk being ineffective.

Cross-program participation is low – only 18% of participant addresses are linked to two or more City rebate/reduced-fee programs.

VARIABLE COMMUNITY AWARENESS AND UNDER-UTILIZATION OF COMMUNITY PARTNERS

17 individuals from nine non-profit organizations serving Fort Collins and Larimer County residents were surveyed about their knowledge of, and collaboration with, City of Fort Collins reduced-fee/rebate programs. These partner community organizations included CSU Care Program, various UC Health/Poudre Valley programs, the Volunteer Income Tax Assistance Program, Project Self Sufficiency, Neighbor to Neighbor, Energy Outreach Colorado, and the Food Bank of Larimer County. Close to 80% of non-profit partners surveyed indicated they work directly with low-income people in Fort Collins.

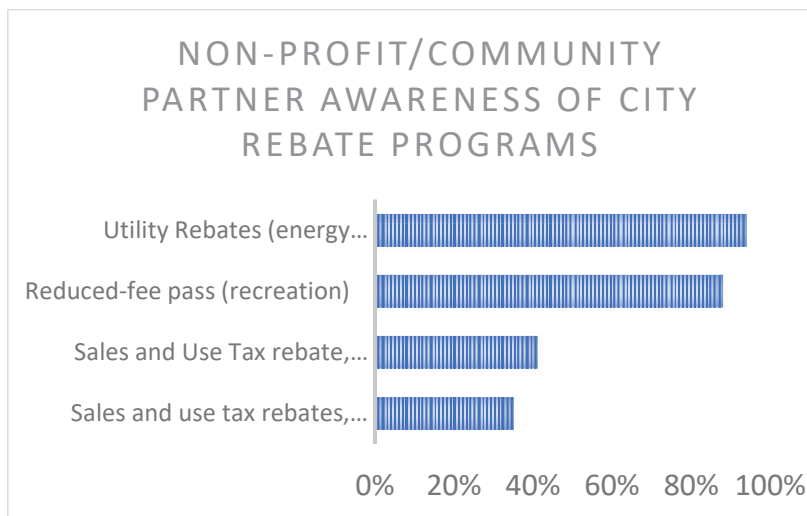


Figure 19: Non-profit/Community Awareness of City Rebate Programs

Between 80-90% of respondents were familiar with the City's reduced-fee recreation pass and the Utilities IQAP program. On the contrary, less than half knew about the property tax and utility tax rebates managed out of the Finance Department (35%) (Figure 19).

As a result of differing levels of awareness and intentional collaboration, non-profits in Fort Collins extend varying levels of support for City reduced-fee and rebate programs. Lack of full support from partners means lost marketing and outreach opportunities as well as lost opportunities for direct assistance with application management, etc. Across the rebate/reduced-fee programs evaluated in this study, IQAP, followed by the reduced-fee recreation pass program, enjoys the greatest familiarity in the community and the most direct non-profit support (Figure 20).

As a result of differing levels of awareness and intentional collaboration, non-profits in Fort Collins extend varying levels of support for City reduced-fee and rebate programs.

The FSA Rebates, with only seasonal FTE support, has the least familiarity by and direct support of community partners. In particular, the property tax (PTR) and utility sales tax (UTR) rebates are the least well-known rebates and community partners are

In particular, the property tax and utility tax rebates housed in the Finance Department, have the lowest level of non-profit familiarity. It benefits the least from non-profit support and coordination.

not well-leveraged to support them. Moreover, based on interviews, a few individuals working for the Larimer County Food Bank were unaware of the FSA Rebate program’s provision of a grocery tax rebate (GTR).

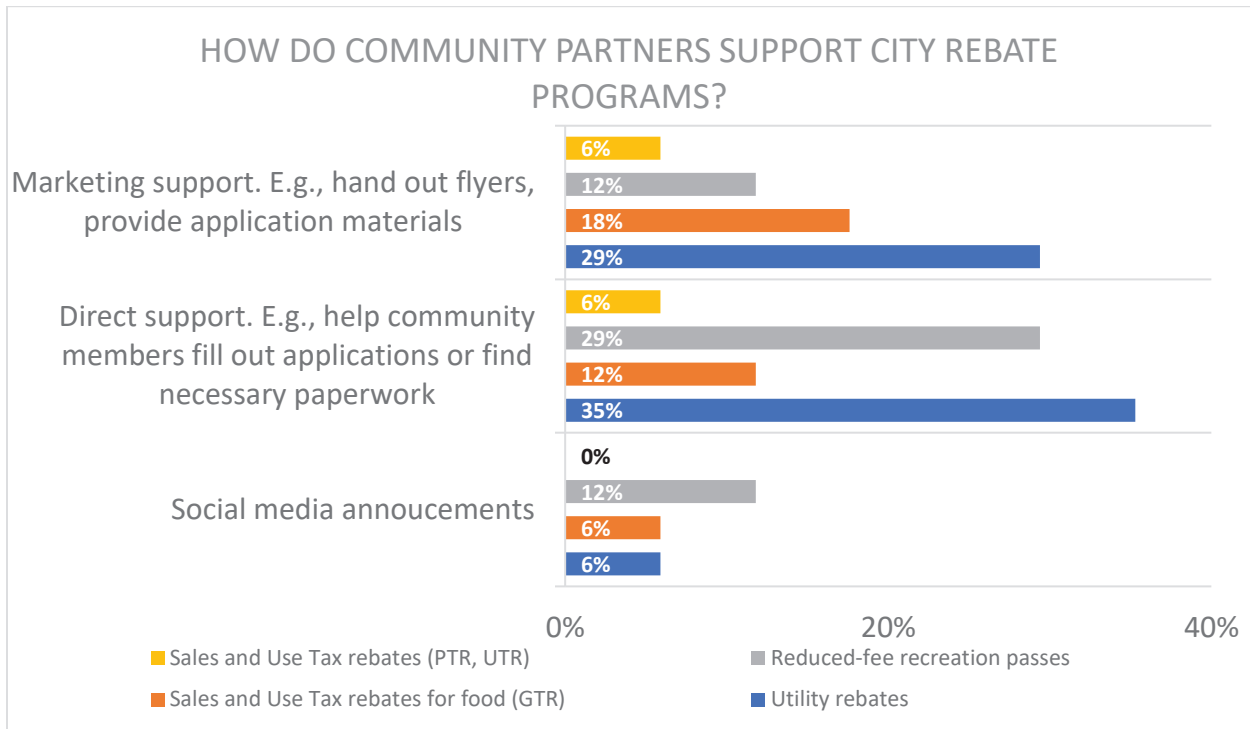


Figure 20: How community partners support City-wide rebate programs

CITY-WIDE, LOW-INCOME PROGRAMMING IS INEFFICIENT AND LESS IMPACTFUL

Limited success in cross-program participation currently means a reduction in the potential combined impact of these programs—whereby the possible impact of the ‘portfolio of low-income services’ could be greater than the sum of independent department initiatives.

It also means that **each department charged with administering an income-eligible program pays the ‘full cost’ of its administration**, potentially re-processing the same applicant annually for multiple City services or each expending the same time and energy trying to reach similar participants in the community.

Moreover, lack of centralization between these different programs has led to the adoption of different approaches, including different methods for leveraging community partners, variable eligibility thresholds affecting participation, and differing levels of staff/programmatic resources available for deployment. As a result, analysis performed for this report suggests that each department that manages a reduced-fee/rebate program has reached a slightly—or in some cases very different—low-income population.

DIVERGENT INCOME THRESHOLDS AND OTHER CRITERIA MEAN DIFFERENT POVERTY POPULATIONS ARE TARGETED AND SOME ARE LEFT OUT

Each reduced-fee/rebate program evaluated in this study utilizes a unique threshold for determining income-eligibility, based on household size: the Finance Rebates program uses estimates of area median income from Larimer County; the Recreation Department uses 185%

of FPL (or verification of enrollment in PSD free-and-reduced lunch); and the Utilities IQAP aligns with the state-wide LEAP program criteria of 60% of state area median income (see Figure 21). For example, Recreation’s alignment with the PSD free-and-reduced lunch program targets families with school-aged children, while the prerequisite of senior/disability status for certain Finance Rebates ultimately targets a different demographic. As a result, each program reaches individuals and families at slightly different income thresholds and with different household compositions, making city-wide targeting difficult and applicant navigation a challenge.

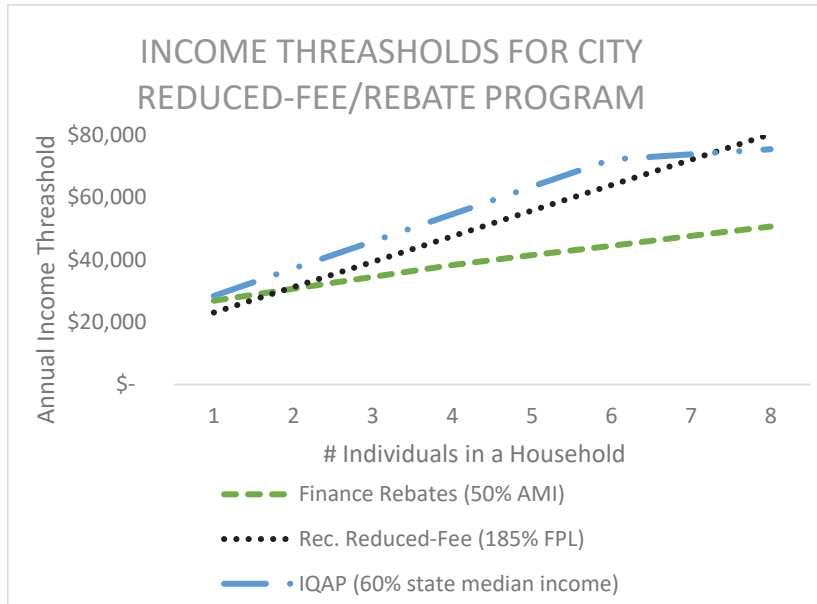


Figure 21: Cross-program Poverty Thresholds. Source: City of Fort Collins departments/service areas

When compared to the other income-qualified programs the Finance Rebates program sets the highest bar for participation, meaning they require an individual or household to be relatively worse-off than households qualifying for IQAP (energy assistance) or the Recreation reduced-fee program.

Moreover, the Finance Rebates program requires not only proof of relatively more extreme poverty than the other programs, but an additional criterion of being either elderly and/or disabled to qualify (for the PTR, UTR). Thus, even if an

individual or family qualifies based on income, they may not qualify based on age or lack of disability.

In terms of outreach, the FSA Rebates program has been less successful than other City rebate/reduced-fee programs, as indicated below.

- **Finance:** reaches ~8-10% of estimated, overall income-qualified families. However, this is likely higher due to additional program requirements beyond income.⁵⁵
- **IQAP:** reaches 70%+ of Fort Collins based LEAP qualified participants.
- **Recreation Reduced-Fee program:** reaches ~80% of income-qualified families.

Compared to other City programs, the Finance Service Area Rebates have the most restrictive criteria for participation. They have the lowest threshold for income (i.e., only the poorest qualify) and 2 out of the 3 Finance rebates offered are restricted based on age or disability status.

⁵⁵ This does not take into account disability status or age, meaning that the penetration is likely much bigger, considering these additional restrictions.

WIDE VARIATION BETWEEN DEPARTMENTS IN TERMS OF RESOURCES DEVOTED TO RUNNING LOW-INCOME REBATE/REDUCED-FEE PROGRAMS

There are several explanations for why the different service areas and different departments have unique approaches to managing and income-qualified program. These include:

1. Delineated vs. non-delineated program budgets. This has ramifications for:
 - Accurate knowledge of resources available for long-term planning and programmatic investing;
 - Alignment of resources toward achieving specific milestones;
 - Accountability for use of resources toward achieving specific objectives.
2. Dedicated vs. seasonal FTE. This explains differences in:
 - Marketing efforts;
 - Ownership of the process and opportunities for process improvements;
 - Relationship management with community partners.
3. Leveraging vs. non-leveraging of community partners. This has ramifications for:
 - Ability to build awareness and effectively market to and reach challenging populations;
 - Outsourcing aspects of program operations (application management, income verification, cross-promotion, etc.).

Rebate Program	Delineated budget?	Allocated full-time FTE?	Highlighted FTE role(s)	Level of Community Partner Support
Utilities- UAP	Mostly	YES <ul style="list-style-type: none"> • 1 FTE (Program Manager; year-round) • 1.35 FTE (spread out amongst 4 staff) 	Cross-city coordination Marketing, event support Partnership building Direct engagement with participants Process improvement	HIGH <ul style="list-style-type: none"> • LEAP • Non-profit partner meetings
Finance Rebates (UTR, PTR, GTR)	YES	PARTIAL 33% staff-time (moved from contractual, seasonal position to permanent position).	Application verification, data processing No cross-city coordination currently Seasonal marketing (not year-round)	LOW <ul style="list-style-type: none"> • As of fall 2019
Rec. Reduced-fee Program	NO Specific program budget is not clearly delineated within larger department budget	PARTIAL .75 FTE (spread across multiple people)	Application management Application verification Marketing/outreach with PSD	MODERATE <ul style="list-style-type: none"> • PSD knows and supports this program, but how communication between PSD and City works is unclear.

LOW-INCOME RESIDENTS ARE NOT VIEWED AS A UNIQUE CONSUMER OF CITY-SERVICES

Typically, the ordinances underpinning a rebate reflect the neediest demographics of the period within which they were written. For the FSA rebates, this would have been the poverty population of the 1970s and 1980s. Council should consider updating these ordinances to reflect the demographics of the low-income community today. For example, while seniors do represent a vulnerable population in 2020, the evidence put forth in this Evaluation suggests that attention should now extend to the families that represent the ‘working poor’ as well as female heads of households (see pages 14-18).

Beyond a recalibration of criteria to better target and reflect the realities of poor individuals and families in Fort Collins today, low-income residents have not been understood as a separate and unique consumer of City services.

Per the discussion throughout the section entitled *Background and Key Concepts*, the following questions about customer service and design were evaluated for each City rebate program within scope of this report:

	(1) <i>What evidence exists that the policy/program <u>has been designed for the ‘poverty experience?’</u></i>	(2) <i>What evidence suggests that this program/policy <u>hasn’t been designed—or has more work to do—to accommodate the ‘poverty experience?’</u></i>
Utilities- IQAP	<p>Moderate/significant evidence exists.</p> <ul style="list-style-type: none"> Marketing efforts are intended to ‘reach people where they are at’ via the LEAP mobile ‘sign-up’ van, pop-up events in the community and presence at existing community events. Strong collaboration with nonprofit partners means leveraging the existing relationships community organizations already have with low-income populations. 	<p>UNKNOWN—IQAP program is still in its first pilot year.</p>
Finance Rebates (UTR, PTR, GTR)	<p>Limited/no evidence exists:</p> <ul style="list-style-type: none"> Individual staffers have volunteered to help improve the process in small ways, but lack of a program manager has complicated process ownership/improvement opportunity. Application materials have been revamped for clarity but have not benefited from a Human-Centered Design (user-centered design) approach. 	<p>NEED TO DESIGN FOR USER POVERTY EXPERIENCE</p> <p>Evidence: declining user-base</p> <ul style="list-style-type: none"> Possible equity issues – PTR and UTR are limited to seniors and/or people with disabilities. A low-income family can only apply for the GTR. <p>Evidence: aging user base</p> <ul style="list-style-type: none"> Limited impact: Weigh the efficacy of reaching low-income people with the limiting age-specific criteria. <p>Evidence: online system lacks user-friendliness</p>

		<ul style="list-style-type: none"> • Unproductive online system means applicants must transport themselves to City offices or send sensitive information in the mail. • Impractical hours (applicants must come to City offices to drop off applications during work hours). <p>Evidence: process imposes high cognitive burden</p> <ul style="list-style-type: none"> • Applicants must remember seasonal application window (August-October). • Applicants must remember unique set of document requirements. • Unique income threshold that is dissimilar from other City rebate/reduced-fee programs.
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Recreation Reduced-Fee Program</p>	<p>Moderate evidence</p> <ul style="list-style-type: none"> • Type of passes offered, and recreation opportunities discounted were informed by public outreach. • Application has recently undergone FC Lean ‘Form Fest’ review, which dramatically shortened and clarified the application. • While application materials have been revamped for clarity there has not been an effort to leverage Human Centered Design (user-centered design) concepts. 	<p>NEED TO DESIGN FOR USER POVERTY EXPERIENCE</p> <p>Evidence: declining adult use, despite high numbers of impoverished adults</p> <ul style="list-style-type: none"> ▪ Reaching singles and adults is problematic for this program; it primarily draws households with children. <p>Evidence: lack of information security</p> <ul style="list-style-type: none"> • Front-desk staff copy/manage sensitive applicant information without secure privacy processes. <p>Evidence: application process requires moderate cognitive burden</p> <ul style="list-style-type: none"> • Separate application is required, similar to other City programs. • Unique income thresholds that differ from other City rebate/reduced-fee programs.

SUMMARIZED FINDINGS

Merging these datasets and considering the low participation rates plus the user design opportunities and challenges among these programs, suggests the following about the City’s reduced-fee/rebate programs:

- **Close to 50% of low-income residents remain unserved by the City’s low-income programs.** Of those that do participate, only 18% of addresses associated with a low-income resident is linked to more than one reduced fee/rebate program.
- **Low-income people almost certainly find navigation of City services a challenge.** If the City is serious about low-income people as a unique customer service segment and offering customer-centric service, low-income programming should be managed centrally and coordinated intentionally with both FTE and programmatic resources.
- **Departments struggle with income verification and are not aligned around poverty thresholds.** Not only does each department pay the ‘full cost’ of their program administration, but their targeting is unfocused, each reaching a slightly different

impoverished population. Also, lack of standardization around management of sensitive income verification documents is an underappreciated privacy and legal risk for the City.

- **Unlike other unique populations, low-income residents are typically not considered a unique customer segment** and thus do not have dedicated resources available in the City to support, navigate or advocate for the unique needs, behaviors and circumstances of low-income people.^{56 57}
- **Ordinances underpinning several rebate programs reflect an outdated view of who is low-income in Fort Collins.** Consider mechanisms to continually update target demographics, based on current data about what types of individuals and families are low-income in Fort Collins.
- **Lack of standardized data and data tracking makes assessing resident engagement across City programs nearly impossible.** Better systems are needed for understanding how low-income people fully interact with—or are isolated from—available City services.
- **Few staff resources (FTE) are devoted to managing successful outcomes for this unique user group (low-income people).** With resources available to better market programs, develop relationships with community partners, improve application processes and better deliver service to low-income residents, the City could improve cross-program participation outcomes for this user group.
- **Key community partners and non-profits are unaware of certain rebate/reduced-fee offerings at the City.** Without awareness, non-profits are unable to alert their low-income clients of City opportunities and help improve City programming.
- **Key community partners may know about some rebate programs, but they could be better utilized.** Of the non-profits and community partners surveyed, no more than 50% actively support City rebate/reduced-fee programs either directly (by supporting low-income clients to fill out applications) or indirectly (via marketing like posters or flyers, or social media mentions).

⁵⁶ For example, Key Accounts Representatives in Utilities manage relationships with select Utilities business customers, Economic Health Office staff liaise with small business owners, and CityGive manages donor relationships.

⁵⁷ The IQAP program is an exception. It provides dedicated, year-round support to low-income customers served by the IQAP, MAP or PAF assistance programs.

CROSS-CITY REBATE PROGRAM RECOMMENDATIONS

This evaluation highlights several opportunities for an improved, city-wide approach to rebates and reduced-fee programs for the local low-income population. Less than 20% of the participant data for the programs analyzed in this study indicates that low income customers participate in more than City-managed rebate/reduced-fee program. Low-income people find navigation of City services a challenge and siloed programming is minimizing impact and causing administrative cost duplication. Each department pursues their own path for marketing and outreach (or not) to a low-income customer type that a department itself defines in a vacuum. The results have included divergent income and eligibility thresholds, different targeting techniques and overall a less effective way to spend public funds for social impact. Without a city-wide strategy outlining a common language, definition, design, and marketing approach, low income people will continue to be overlooked as the unique users of government services that they are.

Customer segmentation of low-income customers, prioritization, and program management centralization could ensure that these currently siloed programs align to create a 'portfolio' of integrated, cross-functional work. The Evaluation Team believes this can be undertaken in three steps covering strategy, structure and systems:

- 1) Strategy: city-wide goal setting.
- 2) Structure: program centralization (a single application system paired with a dedicated FTE, a 'benefits expert'). The program should be governed in a cross-functional way, with input and alignment happening among reduced-fee/rebate offering departments.
- 3) Systems: a commitment to program design principles that reflect the City's understanding that low-income people represent a unique customer segment.

(1) STRATEGY: CITY-WIDE GOAL SETTING

Departments implementing low-income rebates and reduced-fee programs typically operate their programs in 'silos' with minimal resources and little city-wide strategic guidance. A set of strategic City-wide goals to guide low-income programming should be shared across departments. Strategic goal setting around low-income programming will also act as an orienting principle, standardizing the language, metrics, marketing and resources utilized at the department level.

Similar cross-functional programming efforts, where departments work towards specific department-relevant goals that align to larger city-wide goals focused on low-income service delivery, have been undertaken successfully before. See, for example, the staff and executive governance model and execution underway with City's current Climate Action work⁵⁸.

For low-income programming, targets paired with City-wide goals should be researched thoroughly and deeply considered, perhaps by a third-party. Topically, they may include:

- Promoting economic security with assistance in meeting basic needs (energy, tax relief);
- Opportunities to access high-quality cultural events and recreation.

⁵⁸ City of Fort Collins Climate Action: <https://www.fcgov.com/climateaction/>

Participation targets and success indicators should be linked to each of the articulated goals in order to track and evaluate progress.

(2) STRUCTURE: CENTRALIZATION

Simply put, departments are developing and offering low-income rebate and reduced fee programs in isolation and that's both expensive and less effective than managing cross-functional efforts centrally. At the moment, individual programs do not benefit from the economies of scale that could otherwise come from strong collaboration. Instead, they experience high administrative burdens and absorb duplicative marketing and outreach costs.

For low-income customers, they must navigate the multiple applications, unique and specific entry requirements, differing deadlines, and keep track of individual program offerings.

Centralization could accomplish the following:

- **Streamlined administration:** obtain economies of scale and eliminate the duplicative marketing, application management and income verification currently undertaken by each individual department.
- **Unified programming that maximizes impact:** increase success of cross-program participation with a single application.
- **Meaningful marketing that targets the 'neediest' per Council and Executive guidance:** address these customers' unique marketing and outreach needs and improve customer service.
- **Clear roles and responsibilities:** centralize administration of low-income services with dedicated FTE program manager(s) and cross-functional participation by relevant Service Area Directors.

MODELS TO CONSIDER

Notably, the City of Fort Collins can benefit from centralization and navigation models already underway with several non-profit and regional partners nearby. For example, the Larimer County Public Health Department's Human Services Department manages a single application through the state-run PEAK⁵⁹ application that, with an online application portal and

Centralization models for similar program objectives already exist in our community. These include:

The "navigator" model used by non-profit and for-profit partners like UC Health

Single application portals paired with knowledgeable benefit analysts like the one used by PEAK/Larimer County Human Services Department

knowledgeable benefit experts, covers multiple state and regional programs that each have unique eligibility thresholds. A potential customer comes in or enrolls online, providing one set of documents that can enroll them in multiple programs, depending on which ones the individual qualifies for.

Similarly, at UC Health, 'navigators' are hired to help recently diagnosed individuals navigate local, state and regional services that can improve quality of life or sustain successful treatment. These navigators work closely with local

⁵⁹ Colorado Department of Human Services: <https://www.colorado.gov/pacific/cdhs/cash-assistance>

stakeholders to manage cases and enroll patients in beneficial programs.

CROSS-FUNCTIONAL GOVERNANCE

Resourcing with a dedicated FTE (a benefits ‘expert’), should occur in tandem with a commitment by each department and associated Service Area Director to provide alignment and oversight. A cross functional governance structure—either via a steering committee or executive-level committee— is essential to create department and service-area buy-in as well as cross-collaboration opportunities.

MONITORING AND REPORTING

Without centralization, aggregation of participant data in individual programs remains a nearly impossible challenge. For this evaluation, a unique, cross-sectional dataset had to be constructed from individual datasets in various departments in different digital forms (logged in RecTrac, in Access, buried in Govern, and tabulated in excel).

If centralization is to occur, successful programming will only happen when program managers and leadership can use verified, accurate data to draw insights into program operation and outcome success. For example, the integration of city-wide rebate/reduced-fee participation data will finally be able to tell us who is participating, who is not participating and provide insight into outreach improvements.

Assuming centralization and aggregation of data is possible—staff resourcing and programmatic dollars for an online application system with back-end analytical capabilities of user-data would be required—regular monitoring and reporting to leadership, Council and a relevant cross-functional steering committee should be regularly scheduled.

(3) SYSTEMS: DESIGN FOR LOW-INCOME PEOPLE AS A UNIQUE CUSTOMER SEGMENT

Low-income residents within the city must be seen and managed as a unique subset of City customers—by central program staff, participating departments and the wider City organization. Fortunately, the City has already engaged in efforts to segment customers and address differing needs. For example, the City uses a cross-functional team to coordinate outreach, streamline programming and synchronize relationship management with the business community, as well as with philanthropic donors⁶⁰. The City’s Business Engagement Action Plan (BEAP) represents a cross-functional team that coordinates responses to the business community and co-manages business relationships amongst the Economic Health Office and the CFCU, among other departments.

A common approach and design for low-income programming will align

Low-income residents within the city must be seen and managed as a unique subset of City customers.

Fortunately, the City has already engaged in efforts to segment customers and address differing needs.

⁶⁰ See the City’s Business Engagement Action Plan (BEAP), co-managed by a cross-functional group from the Economic Health Office, Utilities Customer Engagement Team and City Manager’s Office. For the philanthropic and donor community, there is cross-city coordination undertaken by the CityGive program.

department efforts for this specific group using government services. Opportunities to recognize and design for a unique low-income segment will require:

1. **Development of a common language to describe the targeted population(s).** Include a standardized inventory of services and adopt a common measurement for determining 'low-income' status⁶¹. Specifically, this requires associated departments across the City to:
 - Agree upon a common definition of poverty or utilize an income range.
 - Agree on how/when updates to this definition may occur, based on demographic shifts and changes in economic status, costs of living, etc.
2. **Adopt a strategic action and communications plan for a defined low-income population for departments to follow.**
 - Establish a common communications approach when working with low-income individuals or relevant community partners.
 - Specify outreach and cross-promotion commitments for each department.
 - Identify and agree on executive-level, department-level, and team-level roles and responsibilities.
 - Articulate executive-level support and specify how executive engagement will be maintained.
3. **Require departments to institute user-specific, human centered design principles.** Utilize these principles when developing, improving and managing programs that target low-income populations.
 - Prioritize Human-Centered Design when developing or making improvements in programs targeting low-income people⁶².
 - Recognize that people experiencing poverty do not make decisions like their non-poor counterparts and that they face unique constraints and employ a unique set of responses and behaviors.
 - Minimize the time and cognitive costs for a low-income person engaging with a City service. For example, prioritize:
 - Shorter, simplified applications and eligibility criteria.
 - Online application submission
 - Leveraging programs low-income people already sign-up for. For example, programs like LEAP, Medicare/Medicaid, free-and-reduced lunch, etc.
 - Revisit the use of affidavits and other legal documents known to intimidate vulnerable populations.

⁶¹ The City Rebate Taskforce has developed an inventory, but it is not clear the definition of 'low-income' continues to be interpreted differently within each associated department and rebate program.

⁶² See Human Centered Design approaches: <https://www.designkit.org/human-centered-design>

APPENDICES

A. NONPROFIT/COMMUNITY PARTNER QUESTIONNAIRE

1. Organization you represent: *

2. Your name, title: *

3. What tends to characterize the populations you work with? Choose all that apply *

- They are low-income
- Mostly families
- Mostly kids (up to 12 years)
- Mostly youth (13-17 years)
- At-risk (experiencing homelessness, illness, abuse, etc.)
- Gender/orientation-specific (specific focus on women, men, LGBTQ+)
- Industry-specific (e.g. artists, musicians)
- All of the above (please explain) *
- None of the above (please explain) *

4. Enough about our categories, how do you prefer to describe the community members you work with?

5. What City-sponsored low-income rebates/programs are you familiar with?

- Rebates to cover energy needs (e.g., utility rebates)
- Rebates to alleviate tax burden (e.g., city property tax rebates)
- Rebate to reduce grocery/food cost (e.g., grocery sales tax rebate)
- Scholarship programs for the arts/culture (e.g., Museum of Discovery, Gardens on Spring Creek)
- Reduced fee programs for recreation (Recreation reduced fee passes/programming)
- Other City reduced fee programs
- Other *
- None

6. Which, if any, of these City programs have you never heard of before? *

- Utility Rebates
- Sales and Use Tax Rebates (city property tax)
- Grocery Rebates
- Reduced fee programs (arts/culture)
- Reduced fee programs (recreation)
- At a minimum, I've at least "heard" of all these opportunities

7. How do you interact with the City's low-income programs? Choose all that apply *

	I help market this opportunity at my place of work with City posters, flyers, applications, etc.	I help community members fill out, find or access the necessary paperwork to sign up.	I announce this opportunity at special events	I announce this opportunity over social media.	I'm unaware of this rebate/reduced-fee program	N/A (this falls outside my scope)
Utility Rebates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sales and Use Tax Rebate (City property tax)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Grocery rebate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduced fee programs (arts/culture)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduced fee program (recreation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other reduced fee programs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8. Utilities rebates, sales and use tax (property tax rebates), and grocery rebates are intended to reduce the cost of living in Fort Collins. In your opinion, do you agree that these rebates effectively meet this objective? *

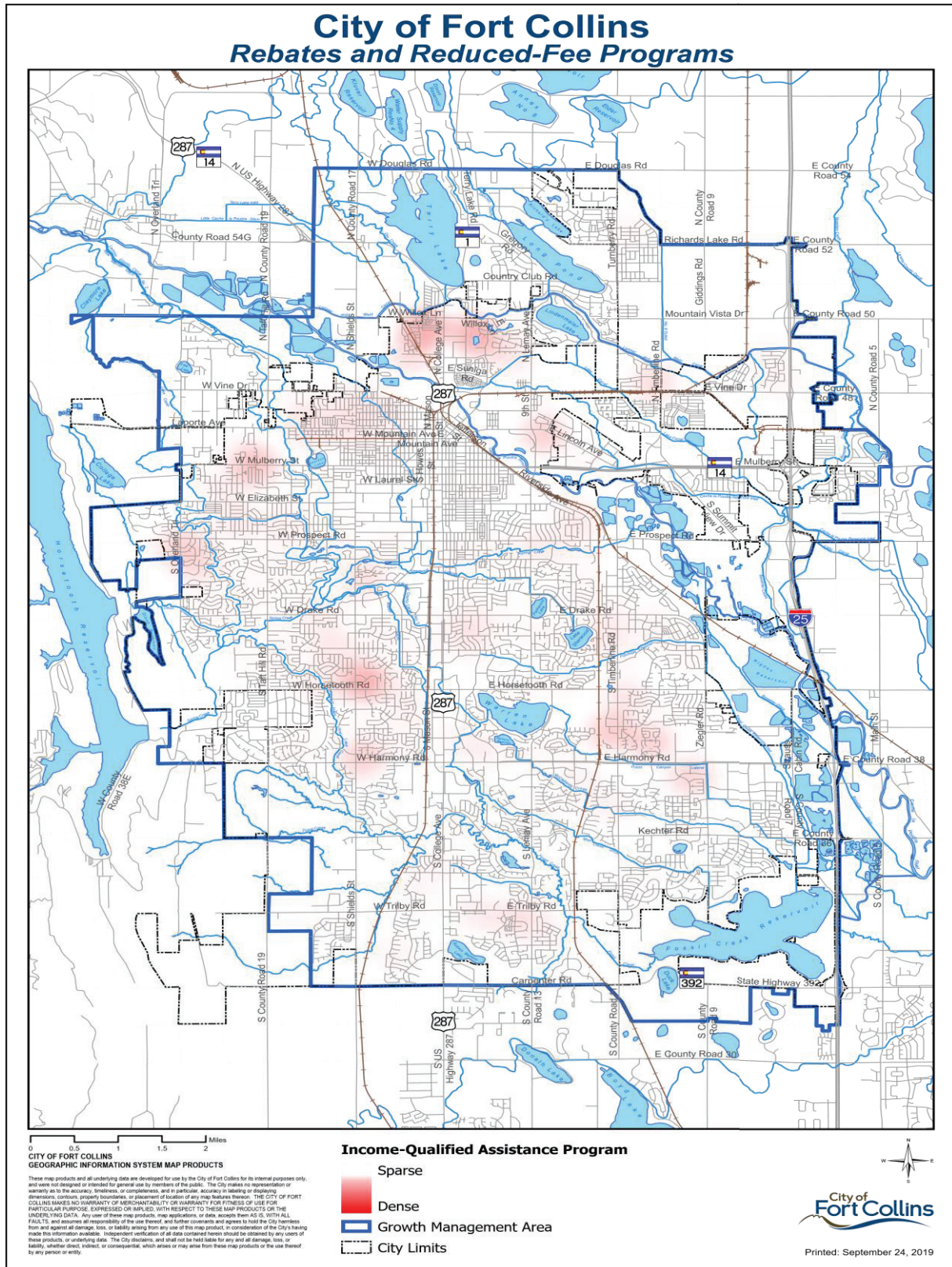
	Yes, these rebates effectively reduce the cost of living in Fort Collins.	No, these rebates do not effectively reduce the cost of living in Fort Collins	I'm familiar with this rebate, but I'm not sure it's effective or not.	I'm not familiar with this rebate and couldn't say.
Utility rebates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sales and Use Tax Rebate (City property tax)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Grocery rebate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9. Reduced-fee programs aim to make a 'good life' in the City more affordable for a range of families and individuals. In your opinion, which of the reduced-fee programs are meeting this objective? *

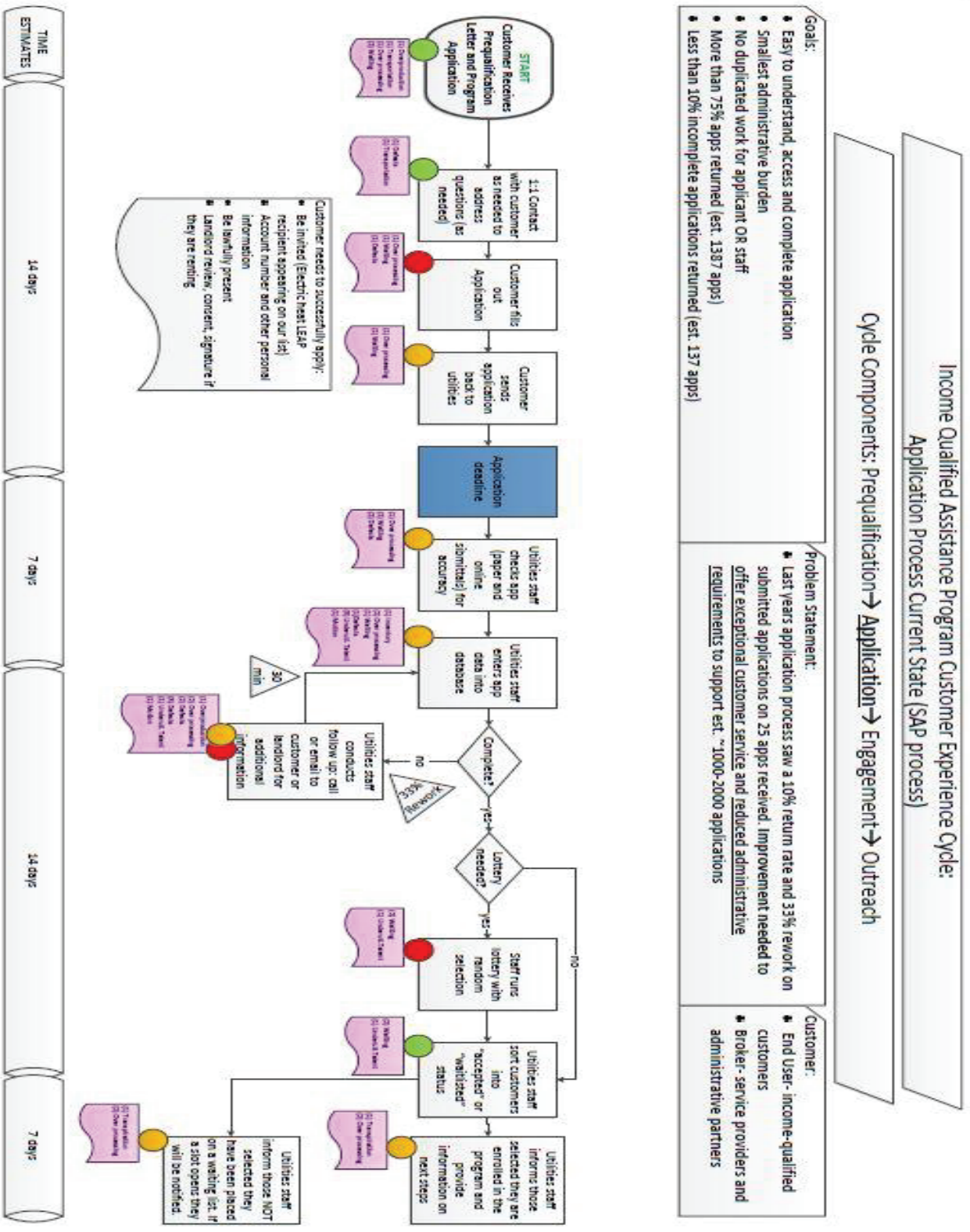
	Yes, this reduced-fee program makes a good life in Fort Collins more affordable.	No, this reduced-fee program doesn't make a good life in Fort Collins more affordable.	I'm not familiar with this reduced fee program and couldn't say.	I'm familiar with this reduced fee program, but I'm not sure how it impacts people.
Arts/culture reduced fee programs (Museum of Discovery, Gardens on Spring Creek)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recreation reduced fee programs (recreation facilities, recreation programs)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. What else would you tell us about the City's rebate/reduced fee programs? For example, is the application easy to complete? Is the acceptance criteria reasonable? Is there enough time to complete and submit an application? *

B. SPATIAL MAP OF IQAP PARTICIPATION



C. UAP PROCESS MAP FOR IQAP



D. UAP APPLICATION: IQAP

LEAP INTO MORE SAVINGS

You may qualify for IQAP if you received LEAP during the previous or current season and live in a household with an eligible Fort Collins Utilities electric, water and/or wastewater account.

IQAP lowers your utility bill so you can focus on other critical expenses.

You can benefit from money-saving opportunities beyond the reduced rate through free home efficiency and educational activities by dedicating about two hours of your time a year.

How to Participate:

- Fill out and return the IQAP application after you've been approved for LEAP.
 - You will be informed of IQAP acceptance within four to eight weeks.
- Participate in free efficiency and educational activities (approximately 2 hours per year).
- Renew IQAP after applying for LEAP each year.
 - The rate is in effect until the September following enrollment.

Need Help or More Information?

fcgov.com/IQAP

utilitiesaffordability@fcgov.com

970-212-2900, V/TDD 711

Esta información sobre el programa "Income-Qualified Assistance Program", que ofrece una tarifa de luz y agua a descuento, puede ser traducida, sin costo para usted.

TAKE CONTROL OF YOUR ELECTRIC BILL

Off-peak prices are approximately 70% less than on-peak prices. Save money by *shifting* your electric use to the lower-priced, off-peak hours or by *reducing* your use.

- **Off-peak hours:** 19-20 hours each weekday, all weekend hours and major holidays
Major holidays: New Year's Day, Memorial Day, Fourth of July, Labor Day, Thanksgiving and Christmas
- **On-peak hours:** October-April 5-9 p.m., weekdays only
- **On-peak hours:** May-September, 2-7 p.m., weekdays only

Learn more: fcgov.com/TOD



Switching to LED bulbs is an easy improvement that helps lower your utility bill long term.



This document can be translated into any language by calling 970-212-2900. Auxiliary aids and services are available for persons with disabilities. V/TDD 711

Apply here or online at fcgov.com/IQAP

- Information provided will not be shared or used for any other purpose.
- Please PRINT CLEARLY.

LEAP Applicant Name

Best Email

Best Phone

Utilities Account Holder (if different from LEAP applicant)

Street Address

Account number

□	□	□	□	□	□	—	□	□	□	□	□
---	---	---	---	---	---	---	---	---	---	---	---

Account number can be found on your utility bill or by calling 970-212-2900.

Affidavit of Lawful Presence and Income Eligibility

My signature below certifies all information on this application is true and accurate, I can submit secure and verifiable documents showing I am lawfully present in the United States if requested, the total household income for this residence qualified for current or previous season LEAP benefits, and the homeowner, whether an occupant or a landlord, agrees to the program terms. I further acknowledge that making a false, fictitious, or fraudulent statement or representation in this sworn affidavit is punishable under the criminal law of Colorado as perjury in the second degree under C.R.S. 18-8-503, and it shall constitute a separate criminal offense each time a public benefit is fraudulently received.

I consent for Utilities to contact me by email, telephone or mail regarding participation in IQAP program activities.

Signature

Print

Date

Solicite aquí o en línea en fcgov.com/IQAP

- La información que provea no será compartida ni usada para ningún otro propósito.
- Por favor escriba CLARAMENTE Y EN LETRA DE IMPRENTA.

Nombre del solicitante de LEAP

Correo electrónico/Email

Teléfono

Persona responsable de la cuenta de luz (si no fuese quien solicita LEAP)

Dirección de la casa

El número de cuenta de luz

□	□	□	□	□	□	—	□	□	□	□	□
---	---	---	---	---	---	---	---	---	---	---	---

Encuentre el número de cuenta en su factura de luz y agua, o llame al 970-212-2900.

Declaración jurada de presencia legal y elegibilidad basada en ingresos

Mi firma abajo certifica que la información contenida en esta solicitud es verdadera y correcta, puedo presentar documentos oficiales y verificables para demostrar mi presencia legal en los Estados Unidos, el ingreso total de este hogar calificó para beneficios de LEAP esta temporada o anteriormente, y el propietario de la casa, está de acuerdo con los términos del programa. Reconozco que hacer cualquier representación o declaración falsa, ficticia o fraudulenta en esta declaración jurada se considera perjurio de segundo grado bajo la ley penal de Colorado C.R.S. 18-8-503, y que cada vez que se obtenga un beneficio público de manera fraudulenta, esto constituirá un nuevo delito.

Doy permiso para que el departamento de "Utilities" se comuniquen conmigo con respecto a mi participación en las actividades del programa IQAP.

Firma

Nombre (letra de imprenta)

Fecha

Adhere seal here

E. UAP APPLICATION: MAP

Medical Assistance Program 2020 Application

The Medical Assistance Program provides financial assistance through electric medical rates to residential customers who:

- require the use of medically necessary equipment in their home, and/or
- have medical conditions that require air conditioning during the summer billing months.

Please note:

- Program is available to all qualifying residential electric customers.
- Customers are required to apply for this electric medical rate each calendar year. Your 2020 electric medical rate will be discontinued if a renewal form is not received by Jan. 1, 2020. Applicants between July 1 and Dec. 31, 2019, do not need to renew until Jan. 1, 2021.

PHYSICIAN INFORMATION

Patient's full name: _____

Physician's full name: _____ Phone: _____

Office address: _____ City: _____ ZIP code: _____

Physician must complete and sign this section.

Please check all that apply. For a list of HCPCS codes, visit hcpcs.codes/e-codes.

Medical equipment* (E126/A126)

My patient, residing at the service address on this application, has a medical condition that requires the following medically necessary equipment at the patient's residence: _____

REQUIRED: HCPCS Code (Healthcare Common Procedure Coding System Code): _____

Medically necessary air conditioning (E127/A127)

My patient, residing at the service address on this application, has a severe immune compromising medical condition (multiple sclerosis, quadriplegia, paraplegia, scleroderma or hemiplegia), and air conditioning at such patient's residence is medically necessary.

Medical equipment and air conditioning (E128/A128)

My patient requires medically necessary equipment and air conditioning at the service address on this application.

REQUIRED: HCPCS Code (Healthcare Common Procedure Coding System Code): _____

Physician's signature: _____ Date: _____

Colorado medical license number: _____

SUBMITTAL INSTRUCTIONS

Complete all areas of this form:

- Physician/ HCPCS Code information (completed by physician)
- Affidavit of lawful presence in the United States (reverse side)
- Customer information (reverse side)
- Affidavit of income eligibility (reverse side)

Return to Fort Collins Utilities.

Mail to: Fort Collins Utilities
Customer Service Division
PO Box 580
Fort Collins, CO 80522-0580

In person: Fort Collins Utilities
Customer Service Division
222 Laporte Ave.
Fort Collins, CO 80521

Find this application and
information at:
fcgov.com/medical-assistance

fcgov.com/utilities • utilities@fcgov.com • 970-212-2900 • V/TDD 711

Medical Assistance Program

2020 Application



CUSTOMER INFORMATION

Applicant must complete and sign this section. To be completed by Fort Collins Utilities account holder - PLEASE PRINT

Account holder(s) name(s): _____

Account number: _____ - _____ Name of resident at this address requiring assistance: _____

Phone number: _____ Email: _____

Service address*: _____ ZIP code: _____

Number in household: _____ Annual Household Income Range (select one option on next line):

Less than \$10,000 \$10,000-\$14,999 \$15,000-\$24,999 \$25,000-\$34,999 \$35,000-\$49,999 \$50,000-\$74,999 \$75,000+

**If you move and will remain a Fort Collins Utilities Customer, you must notify Utilities to move the rate to the new address.*

Affidavit of lawful presence in the United States

to be completed by Utilities account holder

I, _____, swear and affirm under penalty of perjury under the laws of the State of Colorado that:

I am a citizen of the United States

I am not a United States citizen but I am lawfully present in the United States pursuant to federal law

I understand that this sworn statement is required by law because I have applied for a public benefit. I understand that I must provide proof per state law that I am lawfully present in the United States and submit a secure and verifiable document verifying my lawful presence if requested.

Affidavit of income eligibility

to be completed by Utilities account holder

This program is intended to assist customers for whom the costs of running a medical device results in an economic hardship. The income threshold for this program has been set at 60% of the Larimer County Area Median Income (as determined by the Federal Housing Authority). Based on the number of people within this residence and the income ceiling provided in the table at right, I certify that the total household income is less than the income ceiling and, thus, this account is eligible for this program. I agree, as a condition of my participation in this program, that if asked, I will provide copies of my financial records establishing my household income, including copies of my IRS tax returns.

60% Larimer County Area Median Income - 2019

# in Household	Income Limit
1	\$36,660.00
2	\$41,880.00
3	\$47,100.00
4	\$52,320.00
5	\$57,540.00
6	\$62,760.00
7	\$67,980.00
8+	\$69,120.00

My signature below certifies all information on this application is true and accurate, that I am lawfully present in the United States, the total household income for this residence is less than the household size adjusted income ceiling in the table above, and the resident named above lives at this address full time and requires medically necessary equipment, used at this address, which requires electricity to operate. I further acknowledge that making a false, fictitious, or fraudulent statement or representation in this sworn affidavit is punishable under the criminal law of Colorado as perjury in the second degree under C.R.S. 18-8-503, and it shall constitute a separate criminal offense each time a public benefit is fraudulently received.

Account holder's signature: _____ Date: _____

Application does not guarantee uninterrupted electric service nor prevent disconnection for non-payment.

Customers who are denied medical assistance may submit an appeal to the Utilities executive director based on financial or medical exceptions.

*Medically necessary equipment for this electric medical rate is defined as any durable medical equipment requiring electricity to operate that is required on an ongoing basis by a patient within the residence receiving electric service from Fort Collins Utilities.

Auxiliary aids and services are available for persons with disabilities. Esta información puede ser traducida, sin costo para usted.

fcgov.com/utilities • utilities@fcgov.com • 970-212-2900 • VTDD 711

F. FSA REBATE APPLICATION

FORT COLLINS 2019 REBATE APPLICATION

(for the 2018 Tax Year)

215 N. Mason St., 2nd Floor, Fort Collins, CO 80524 | (970) 416-2304 | fcgov.com/rebate | groceryrebates@fcgov.com

Did all household members live in the City limits of Fort Collins or the growth management area of Fort Collins from January 1 through December 31, 2018? Please contact the rebate office or visit fcgov.com/salestax/address-lookup if you are uncertain. Yes No

If "No," please do not continue with the application because you do not qualify for the rebate.

APPLICANT									
Last Name			First Name				Middle		
Address of Residence			City		State		Zip Code		
Mailing Address (if different than residence)			City		State		Zip Code		
Daytime Phone Number			Alternative Phone Number		Date of Birth		Age		
Fort Collins Utility Account Number			Disabled* Yes <input type="checkbox"/> No <input type="checkbox"/>		Email Address				

*First-time applicants and those with a change in disability status must provide proof of disability.

PLEASE COMPLETE THE FOLLOWING FOR ANY OTHER MEMBERS WHO LIVED WITH YOU THE FULL YEAR OF 2018

Name	Relationship to You	Date of Birth	Age	Disabled (if yes, provide proof)		U.S. Citizen		Not a U.S. Citizen but lawfully present?	
				Yes	No	Yes	No	Yes	No

MORE INFO ON NEXT PAGE

HOUSEHOLD INCOME FOR 2018 Please attach copies of proof of income—federal income tax return, SSI statements, etc. Include total income for the year 2018 for all adults 18 and over in the household (does not include food stamps).

Type of Income	Dollar Amount Received
Salaries, wages, tips, and other employee compensation	
Social Security benefits or SSDI	
Larimer County Human Services Assistance (cash assistance, OAP, TANF, AND)	
Pensions and annuities	
Alimony and child support	
All other income—(please explain)	
TOTAL Income	\$

PROPERTY TAX/RENT AND UTILITY REBATES*

If a household member is 65+ years of age as of 12/31/18, or disabled, please complete the following.

- OWN** (applicant must be the name listed on the assessor's page) If you own(ed) the property at the address above, please provide name(s) of any co-owners: _____
- RENT** (applicant name must be on the lease) If you rent, please list the amount of rent you personally paid in 2018. Mobile home owners please list the lot rent. \$ _____
Provide a receipt for calendar year 2018.

*Properties exempt from property tax are not eligible for the property tax/rent rebate.

How did you hear about the rebate program? _____

AFFIDAVIT — RESTRICTIONS ON PUBLIC BENEFITS

I, _____, swear or affirm under penalty of perjury under the laws of the State of Colorado that (check one)

- I am a United States citizen.
- I am not a United States citizen but I am lawfully present in the U. S. pursuant to Federal law.

I understand that this sworn statement is required by law because I have applied for a public benefit. I understand that state law require me to provide proof that I am lawfully present in the United States prior to receipt of this public benefit. I further acknowledge that making false, fictitious, or fraudulent statement or representation in this sworn affidavit is punishable under the criminal laws of Colorado perjury in the second degree under Colorado Revised Statute 18-8-503 and shall constitute a separate criminal offense each time a public benefit is fraudulently received.

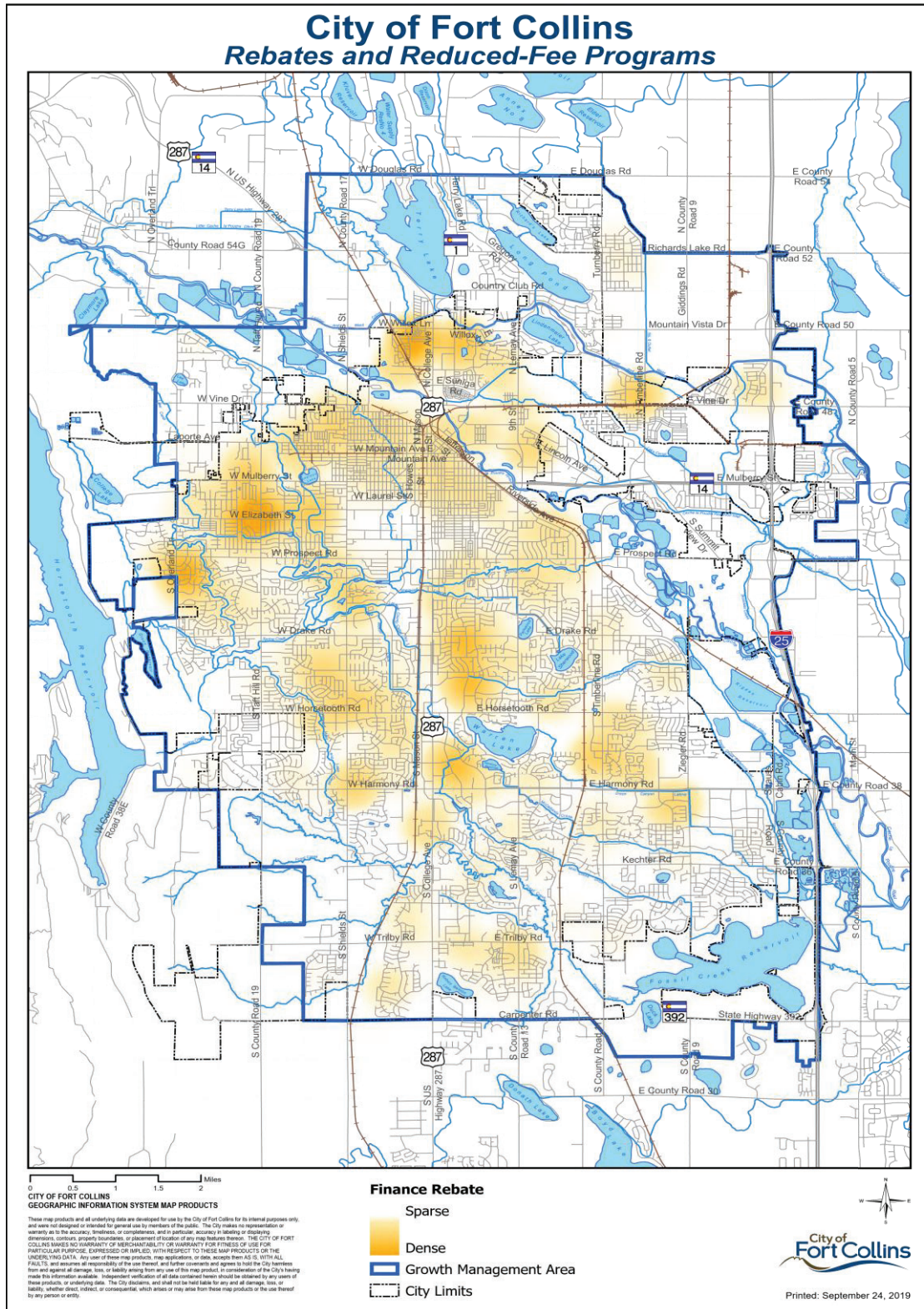
X _____
Primary Applicant Signature Date

DECLARATION

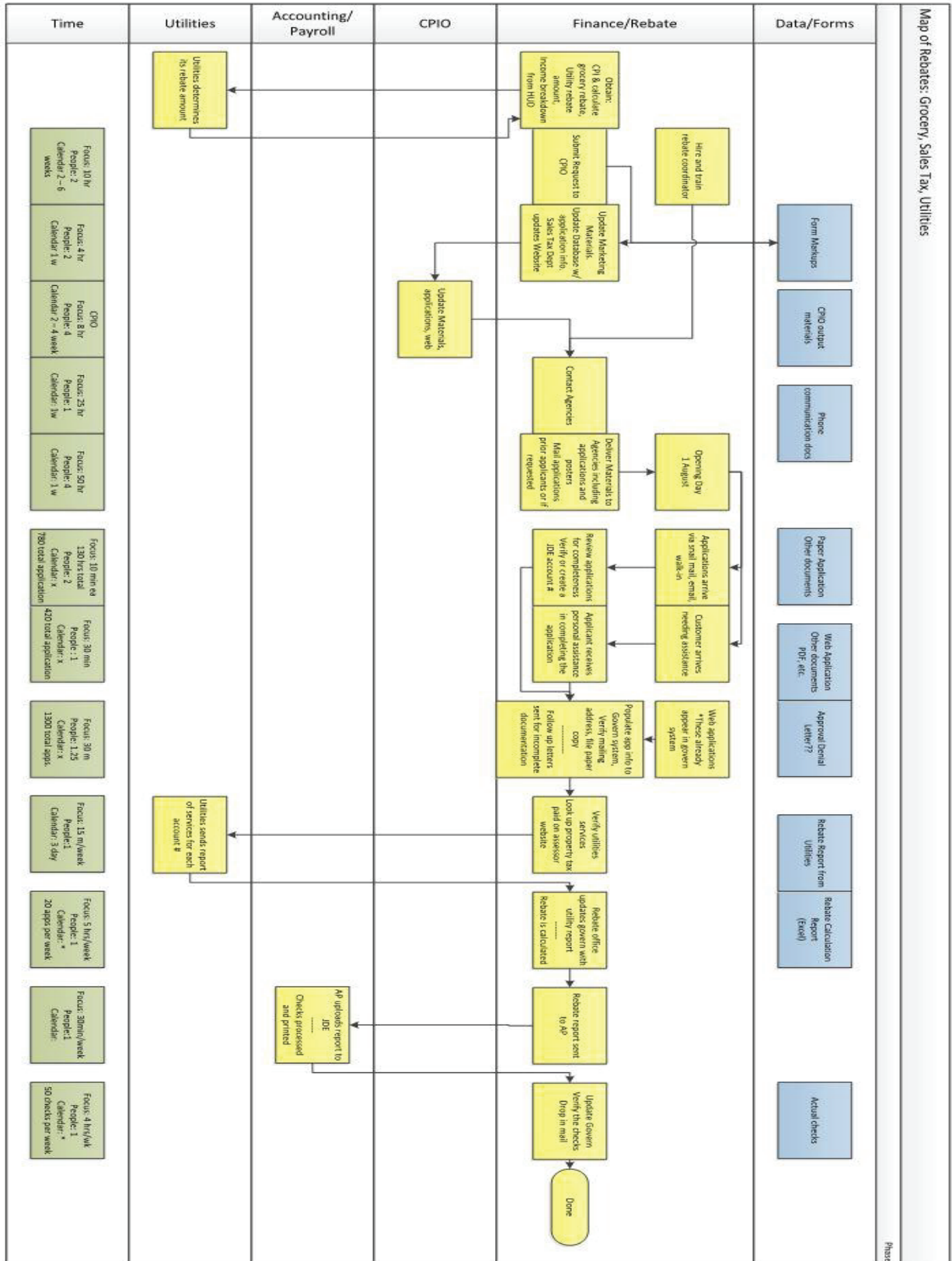
Under penalty of perjury, I declare that I have read and understand the information and qualifications of this application and that all members of this household meet the eligibility criteria. I also understand that I will be permanently disqualified from this program if any information on this application is proven fraudulent.

X _____
Primary Applicant Signature Date

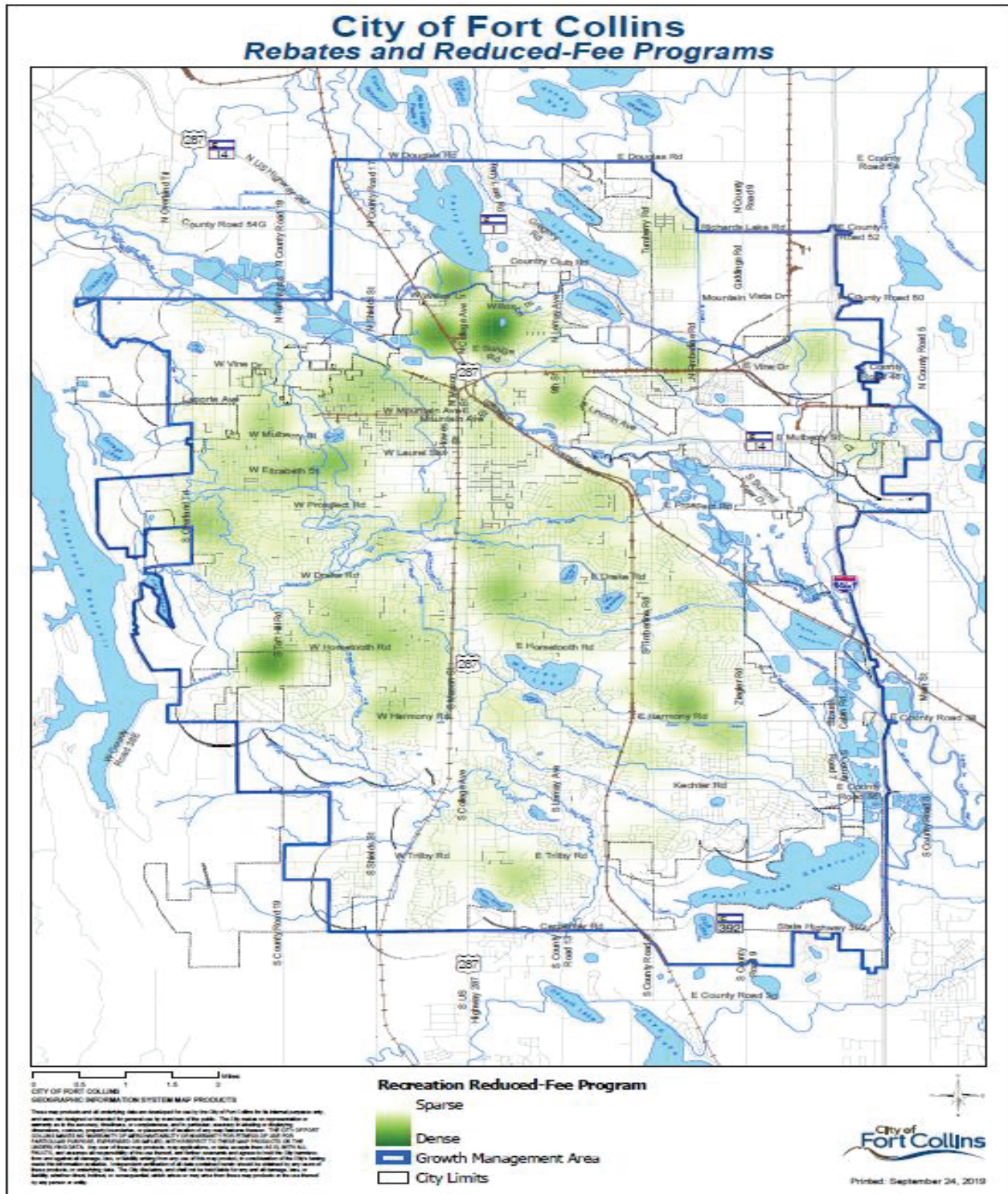
G. SPATIAL MAP OF FSA REBATE PARTICIPATION



H. FSA REBATE PROCESS MAP



J. SPATIAL MAP OF RECREATION REDUCED-FEE PARTICIPATION



K. RECREATION REDUCED-FEE PROGRAM APPLICATION



REDUCED FEE PROGRAM APPLICATION

970.221.6655 • fcgov.com/reducedfee

PLEASE COMPLETE ALL FIELDS

Applying for: Self only Children under 18 only Household

Name _____

Date of Birth _____ Gender (optional) _____

Address _____

Phone _____ Email _____

Name and contact information of person assisting with application, if applicable _____

Additional household members applying for benefits

	Name	Date of Birth	Relationship	Gender	Grade
1.					
2.					
3.					
4.					
5.					
6.					

VERIFICATION – Please attach to application

Income (select one)

PSD Free/Reduced Lunch Letter

OR

Current Proof of Federal or State Assistance Program

OR

Most Recent Tax Return (Total Household Income)

AND Residency (select one)

PSD Free/Reduced Lunch Letter

OR

City of Fort Collins Utility Bill in Your Name

OR

Three Pieces of Mail with Your Name and Address

AND Identification

State or Federal Government issued ID (applicants 18 + must provide)

Visit fcgov.com/reducedfee for specific documents accepted

Applicant Signature (Required)

I verify the information stated on this application is true.

Date

Adult Age 18 + Affidavit Signature

I am a U.S. citizen or legal permanent resident, or otherwise lawfully present in the United States (not required if applying for children only).

Date

Additional Adult Age 18 + Affidavit Signature

I am a U.S. citizen or legal permanent resident, or otherwise lawfully present in the United States (not required if applying for children only).

Date

INTERNAL STAKEHOLDER COMMENTS

SERVICE AREA DIRECTOR COMMENTS

NAME: Kelly DiMartino

TITLE: Deputy City Manager

1. Please provide any comments you may have on the evaluation report's findings or lessons learned.

I found the structure of the report to be very helpful, with both individual program and cross-city findings. Of particular note to me was that low-income people are not considered a unique consumer of City services. I think this shift in thinking has the potential to drive numerous service delivery improvements.

The findings specific to the Recreation reduced-fee program were also insightful. I appreciate the recognition of the significant improvements that have been made to the application process. Additionally, the findings regarding privacy risk help illuminate the need for further process change.

2. Please provide any comments you may have on the evaluation report's recommendations.

My bias is to move toward the cross-city recommendations, acknowledging that it may take additional resource to make this happen. With this Council's focus on equity and inclusivity, the timing seems good to implement the recommendation regarding establishing strategic city-wide goals. Further consideration is needed regarding the best way to do this, and who would lead that effort.

3. Please provide any additional comments you may have.

Job well-done! The evaluation provided valuable documentation and insights to consider as we look to further improve the effectiveness of these programs. While I was part of the team that agreed upon this defined project scope, I believe an important next step will be to conduct a "review lite" of other reduced-fee programs, particularly in Cultural Services and Transportation.

NAME: Jacqueline Kozak-Thiel

TITLE: Chief Sustainability Officer

1. Please provide any comments you may have on the evaluation report's findings or lessons learned.

I think one of the greatest impacts of this work will be the paradigm shift of how we understand and serve our low-income residents as a distinct segment of our community (with different needs, access points, etc.).

2. Please provide any comments you may have on the evaluation report's recommendations.

I am especially excited about the recommendation for how a coordinated strategy and dedicated resource could result in achieving socio-economic outcomes and council's priority of a streamlined approach to low income offerings and increased participation.

3. Please provide any additional comments you may have.

As always, this was so thorough and well done. I think it will have tremendous insight for low income programs that are currently in design, such as broadband.

NAME: Mike Beckstead

TITLE: Chief Financial Officer

1. Please provide any comments you may have on the evaluation report's findings or lessons learned.

All comments have been shared at meetings and the majority have found their way to this document.

2. Please provide any comments you may have on the evaluation report's recommendations.

There are several recommendations (i.e., combining the UTR with the IQAP) that can be directly pursued by the FSA. Others will require a central point-person to pursue to avoid having each of the three rebate programs develop individual solutions to common problems. This includes the online application, central-point of access, and unified marketing.

3. Please provide any additional comments you may have.

Great work and an outstanding report. Thank you.

PROJECT TEAM COMMENTS

UTILITIES AFFORDABILITY PORTFOLIO: Jamie Gaskill, Senior Supervisor; Lisa Schroers, Utilities Affordability Program Specialist

1. Please provide any comments you may have on the evaluation report's findings or lessons learned.

The need for a city-wide strategy and program to address the needs of low-income community members is ever-increasing. The working-poor is a growing population that needs consideration when designing and implementing future iterations of low-income offerings.

It appears that many of the [City's] programs were created to fit a "need at the time" rather than as part of a strategic plan. The program staff, the community members and the community as a whole would benefit from a more strategic approach.

The findings regarding WHO is experiencing poverty in Fort Collins is helpful for us to direct our efforts going forward.

While we were not surprised by the findings about the Utilities Affordability Portfolio we are pleased that community partners have great awareness of the UAP. We will continue to build on that awareness and will work with agencies to connect their clients to additional UAP offerings such as building retrofits.

2. Please provide any comments you may have on the evaluation report's recommendations.

In Utilities we view low-income customers to be a unique customer segment and dedicate resources to supporting programs that serve the low-income population.

The UAP team is already implementing many of the recommendations in the report. Actions underway include:

- Development of a strategic plan with measurable goals and objectives
- The strategic plan is accompanied by a robust outreach and engagement plan that targets existing and new partner agencies as well as direct-customer outreach. Additionally, the outreach and engagement plan includes collaboration with other city departments that offer low-income programs.
- Analysis of the impacts of eliminating MAP and encouraging customers to enroll in LEAP/IQAP instead
- Feasibility analysis of auto-enroll of CFCU customers who are LEAP qualified into IQAP

3. Please provide any additional comments you may have.

FINANCIAL SERVICES REBATE PROGRAM: Jennifer Poznanovic, Senior Manager, Sales Tax/Revenue

1. Please provide any comments you may have on the evaluation report's findings or lessons learned.

Appreciate the thorough evaluation done to review income qualified rebates/programs across three City departments for a more holistic approach. Already aware of findings for the finance rebates but appreciate the well-researched and formalized report.

2. Please provide any comments you may have on the evaluation report's recommendations.

Great take-away to recognize and focus on a new customer segment across the City for low-income residents. Collaboration across departments, more resources and time will be needed to achieve many recommendations.

In the near term, looking forward to focusing on the grocery and property tax rebates out of finance with an elimination of the utility rebate in lieu of the newer IQAP program out of Utilities.

3. Please provide any additional comments you may have.

In the two years that I have been at the City, the Income Qualified Working Group and the program evaluation have led to a better understanding of programs across the City with more collaboration and breaking down silos.

RECREATION DEPARTMENT: Bob Adams, Director; Janice Saeger, Financial Analyst

1. Please provide any comments you may have on the evaluation report's findings or lessons learned.

I appreciated the acknowledgement of the unique target demographics and purpose of each rebate program, whether to ease the cost of living in Fort Collins (basic needs) or accessibility to quality of life opportunities (culture and recreation).

2. Please provide any comments you may have on the evaluation report's recommendations.

Centralization would offer greater efficiency for all programs with the correct level of resourcing in staff and technology, however it may be challenging to increase cross-participation in programs because of each individual's situation, desires, and needs. This ties back to developing a strategic City-wide goal of what is to be achieved with the rebate programs as a whole.

Recreation has designed its reduced fee program in support of Strategic Objective 1.3 - Improve accessibility to City and Community programs and services to low- and moderate-income populations. (This objective has had many similar iterations over the years) The practical application of this objective means anyone who meets the income qualifications receives the benefits of the reduced fee program and is not turned away. As a revenue-generating department this can/does have resourcing implications as the program expands.

If all program income qualifications are tied to AMI through centralization, consideration should be made to increase the percentage of AMI used so as not to exclude a number of Recreation's current participants in the program.

3. Please provide any additional comments you may have.

No additional comments.

STAKEHOLDERS, INTERVIEWS AND REVIEWERS

INTERNAL INTERVIEWS, STAKEHOLDERS

Aimee Housh, Specialist, Utilities Customer Connections, Fort Collins Utilities
Amy Resseguie, Senior Communications Specialist, Community & Public Involvement
Ben Belt, Accounts Receivable / Billing Coordinator, Fort Collins Utilities
Beth Sowder, Director, Social Sustainability Office
Blake Schlup, Accounts Receivable / Billing Coordinator, Fort Collins Utilities
Bob Adams, Director, Recreation Department
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Jenne Loffer, Senior Supervisor, Customer Support, Fort Collins Utilities
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Jolee Sawyer, Senior Supervisor, Customer Support, Fort Collins Utilities
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Lisa Schroers, Utilities Affordability Program Specialist, Fort Collins Utilities
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Wendy Williams, Assistant City Manager, City Manager's Office
Zachary Delissio, Supervisor, Recreation Department

EXTERNAL INTERVIEWS, FOCUS GROUPS, SURVEY RESPONDENTS

Colorado LEAP Program: Melinda Bennett, Eric Crosby
The Family Center, Deirdre Sullivan
Emma Chavez, CARE Program at CSU
Enrique Hernandez, Energy Outreach Colorado
Food Bank of Larimer County
Harry Love, Volunteer Income Tax Assistance
Larimer County Human Services Department, Laura Sator, Vanessa Fewell
Neighbor to Neighbor
Project Self Sufficiency: John Kinnaird, Stephanie Alley, Hannah Dahl, Neva Menchaca,
UCHealth: Deanna O'Connell, Jill Taylor, Laurie Zenner, Colette Thompson, Eileen Hendee,
JoAnn Herkenhoff, Karen Ramirez, Julie Knighton

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David Suckling, Fort Collins Utilities
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Rik Johnson, Planning, Development and Transportation
Roland Guerrero, Lead Specialist, FC Lean, Financial Services

RECEIVED DRAFT REPORT

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RECEIVED FINAL REPORT

All persons who received Draft Report, plus:

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PERFORMANCE & PROGRAM EVALUATION