

City of Jonesboro CDBG Citizen Participation Plan



Department of Grants & Community Development

City of Jonesboro
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Introduction

In 1994, the U.S. Department of Housing and Urban Development (HUD) issued new rules consolidating the planning, application, reporting and citizen participation processes of four formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships (HOME), Emergency Shelter Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA). The new single-planning process was intended to comprehensively fulfill three basic goals: provide decent housing, provide a suitable living environment and expand economic opportunities.

Provision of decent housing may involve assisting homeless persons in obtaining appropriate housing, retaining the affordable housing stock, increasing the availability of permanent affordable housing for low-income households without discrimination, and / or increasing supportive housing to assist persons with special needs. Providing a suitable living environment might entail improving the safety and livability of neighborhoods, including the provision of adequate public facilities; deconcentrating housing opportunities and revitalizing neighborhoods; restoring and preserving natural and physical features with historic, architectural, and aesthetic value; and conserving energy resources. Expanding economic opportunities can involve creation of accessible jobs, providing access resources for community development, and assisting low-income persons to achieve self-sufficiency.

The Consolidated Plan is actually a three-part planning process required by HUD. It comprises developing a five-year strategic plan, preparing annual action plans and submitting a Consolidated Annual Performance and Evaluation Report (CAPER). These three parts are intended to furnish the framework whereby the City of Jonesboro can identify its housing, homeless community, economic development needs, identify resources that will be tapped and actions to be taken that will address the needs, as well as look back and evaluate the City's progress toward achieving its strategic goals. Completing these documents on time and in a manner that is acceptable to HUD ensures continued program funding.

The precursor to the Consolidated Plan is the Citizen Participation Plan (CPP). The objectives of the CPP is to ensure that the citizens of Jonesboro, particularly persons of low- and moderate-income, persons living in slum and blight areas, units of local government, housing agencies and other interested parties, are provided with the opportunity to participate in the planning and preparation of the Consolidated Plan. This includes amendments to the Consolidated Plan and the CAPER.

In doing so, the CPP sets forth general policies and procedures for implementing and carrying out the Consolidated Planning process, such as how the Consolidated Plan is developed, dates and milestones, and methods for citizens to offer the City of Jonesboro assistance and guidance in the formulation of the Consolidated Plan. Furthermore, the provisions of the CPP fulfill statutory and regulatory requirements for citizen participation specified in the U.S. Department of Housing and Urban Development's

rules for the Consolidated Plan, the HOME Investment Partnerships (HOME) Program, the Community Development Block Grant (CDBG) Program, the Emergency Solutions Grants (ESG) Program and the Housing Opportunities for Persons with AIDS (HOPWA) Program. In the City of Jonesboro, the Grants and Community Development Department is the lead department for developing the Consolidated Plan.

In order to ensure maximum participation in the Consolidated Planning process among all populations and needs groups, and in order to ensure their issues and concerns are adequately addressed, the Grants Administrator will follow the standards set forth in its adopted CPP during development of its Consolidated Plan, Action Plan and Annual Performance Report.

Encouraging Citizen Participation

The City of Jonesboro has designed this community-wide Citizen Participation Plan to provide for and encourage citizen participation in its public hearings and HUD-funded programs. This Plan is an essential element of the City's present and future community development process and has been developed to comply with the regulations and requirements of the CDBG program as administered by the Department of Housing and Urban Development (HUD). This Plan supersedes all other Citizen Participation Plans which may have been adopted by the City of Jonesboro.

The primary goal of this Citizen Participation Plan is to provide all citizens of the community with adequate opportunity to participate in an advisory role in the planning, implementation, and assessment of the City's CDBG program. The Plan sets forth policies and procedures for citizen participation, which are designed to maximize the opportunity for citizen participation in the community development process. Special emphasis has been placed on encouraging participation by persons of low and moderate incomes, residents of blighted neighborhoods, and residents of areas where community development funds are utilized.

Citizens are encouraged to participate in all phases of the CDBG program(s) and will be provided full access to program information. However, final responsibility and authority for the development and implementation of CDBG program(s) are the responsibility of the City of Jonesboro.

The City will make reasonable efforts to provide for citizen participation during the community development process and throughout the planning, implementation and assessment of all CDBG program(s), including, but not limited to, the following phases:

- a. identification and assessment of housing and community development needs; determination of CDBG project(s) and documentation; and the development of CDBG application(s);
- b. changes and/or amendments to approved CDBG projects; and,
- c. assessment of CDBG program performance.

All phases of the community development process will be conducted by local officials in an open manner. Citizens are encouraged to participate at all levels and will be given access to program information during each phase of any CDBG program as outlined herein.

Public Hearings and Meetings

As the fundamental means of notifying interested citizens about the Consolidated Plan and related activities, such as the Annual Action Plan or the Consolidated Annual Performance and Evaluation Report, the Grants Administrator will utilize advertisement notices in newspapers of general circulation. Such notices will be published at least fourteen (14) calendar days prior to public hearings. All notices will be written in plain, simple language and direct efforts will be undertaken to publish and / or post information at locations that will elicit maximum low- and moderate-income and minority participation.

The City will conduct at least two (2) public hearings to obtain citizens' views and to respond to proposals and questions. The hearings will occur prior to development of the draft plan and will be intended to solicit public input regarding distinct issues, thereby aiding in developing the content of the plan.

Information about the time, location and subject of each hearing will be provided to citizens at least fourteen (14) calendar days in advance through adopted public notice and outreach procedures. This notification will be disseminated to local governments and other interested parties. Public notification of the hearings will be published in the local newspaper. Grants and Community Development Department staff may also attend other meetings and conventions in the City of Jonesboro throughout the year, thereby providing an opportunity for additional public information on the Consolidated Plan.

Every effort will be made to ensure the public hearings are inclusive. Hearings will be held at convenient times and locations and in places where people most affected by proposed activities can attend. The Grants Administrator will utilize public facilities that are accessible to persons with mobility impairments. If written notice is given at least seven (7) days before a hearing date, the City of Jonesboro will provide appropriate materials, equipment and interpreting services to facilitate the participation of non-English speaking persons and persons with visual and / or hearing impairments. Interpreters will be provided at public hearings where a significant number of hearing impaired or non-English speaking residents can be reasonably expected to participate. All public hearings and public meetings associated with the Consolidated Planning process will conform to applicable Arkansas open meeting laws.

However, the Grants Administrator may, actively solicit input on housing and community development issues during the course of the year by hosting or participating in forums, town hall meetings and other events.

Publication of Consolidated Plan Documents

The Grants Administrator will publish the draft Consolidated Plan documents and the performance report for public review in a manner that affords citizens, public agencies and other interested parties a reasonable opportunity to examine its contents and submit comments. The Draft Plan will be a complete document and shall include:

- The amount of assistance the City of Jonesboro expects to receive; and,
- The range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income.

A succinct summary of the draft plan will be published in a newspaper of general circulation at the beginning of the public comment period. The summary will describe the contents and purpose of the document (including a summary of specific objectives) and include a list of the locations where copies of the entire proposed Consolidated Plan may be obtained or examined. The following are among the locations where copies of the public comment draft plan will be made available for review:

- Grants and Community Development Department located in the Municipal center, 300 S. Church St., Ste 402, Jonesboro, AR
- City of Jonesboro Website, www.jonesboro.org
- The Public Library, 315 W. Oak St., Jonesboro, AR

Citizens and groups may obtain a reasonable number of free copies of the proposed Consolidated Plan by contacting the staff in the Grants and Community Development Department at (870) 932.1052 or at 300 S. Church St. Jonesboro, AR 72401.

Public Comments on the Draft Consolidated Plan, Annual Action Plan, and Consolidate Annual Performance Evaluation Report (CAPER)

The City of Jonesboro' Grants and Community Development Department, as lead department, will receive comments from citizens on its draft plans for a period not less than thirty (30) days prior to submission of the Consolidated Plan, Annual Action Plan or CAPER to HUD.

All comments or views of citizens received in writing during the thirty (30) day comment period will be considered in preparing the final plans. A summary of these comments or views and a summary of any comments or views not accepted and the reasons therefore will be attached to the final plan.

Technical Assistance

An informed citizenry is critical to effective and responsive housing and community development programs. Efforts to educate residents and empower their participation are an ongoing element of the Consolidated Planning process.

Public education and outreach will be facilitated through the use of public advertisements, opportunities for citizen participation and available funding through the CDBG program. The City's Consolidated Plan mailing list will likely include social service organizations, local jurisdictions, low- income housing consumers, neighborhood groups, previous participants and commentators, and others expected to desire input on the Plan. This list is updated periodically and is available for inspection in the Grants and Community Development Department.

Groups or individuals interested in obtaining technical assistance to develop project proposals or apply for funding assistance through HUD formula grant programs covered by the Consolidated Plan may contact the Grants Administrator. Such assistance may be of particular use to community development organizations, non-profit service providers, and for-profit and non-profit housing development groups that serve or represent persons of low- and moderate-income.

Technical assistance may include:

- pre-application workshops
- interpreting the CDBG program and its rules, regulations, procedures and/or requirements;
- providing information and/or materials concerning the CDBG program;
- assisting low and moderate income citizens, and residents of blighted neighborhoods to develop statements of views, identify their needs, and to develop activities and proposals for projects to resolve those needs.

Substantial Amendments

Occasionally, public comments warrant an amendment to the Consolidated Plan or the Action Plan. The criterion to amend is in accordance with HUD's 'Substantial Amendment Criteria'. The following condition is considered criteria for a "Substantial Amendment":

Any change in the described method of distributing funds to local governments or non-profit organizations to carry out activities. Elements of a "method of distribution" are:

- A. Application process for non-profits;
- B. Allocation among funding categories;
- C. Grant size limits; and,
- D. Criteria selection.

Citizen Participation in the Event of a Substantial Amendment

In the event of a substantial amendment to the Consolidated or Action Plan, the Grants Administrator, depending on the nature of the amendment, will conduct at least one additional public hearing. This hearing will follow a comment period of no less than thirty (30) days, where the proposed substantially amended Plan will be made available to

interested parties. Citizens will be informed of the public hearing through newspaper notification prior to the hearing, and the notice will appear in at least one newspaper, which is circulated citywide. The substantially amended sections of the Consolidated Plan will be available in the Grants and Community Development Department for the full public comment period.

Consideration of Public Comments on the Substantially Amended Plan

Comments must be received in writing or at public hearings. A summary of the written and public hearing comments on the substantial amendments will be included in the final Consolidated Plan. Also included in the final Consolidated Plan will be a summary of all comments not accepted and their reasons for dismissal.

4. Substantial Amendment(s)

- A. The City shall amend its approved Annual Action Plan and/or its Consolidated Plan whenever it makes one of the following decisions:
1. To make a change in its allocation priorities;
 2. To make a change in the method of distribution of funds;
 3. To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income), not previously described in the Annual Action Plan; or
 4. To make substantial changes in funding to an “activity” under the CDBG, HOME, ESG and HOPWA Programs.

A substantial amendment is defined as an increase in funding for a particular activity of 25% or more of the original project budget even if the project is funded from multiple Action Plan years. For example, if a project budget equals \$100,000 and the City would like to add \$9,000 to the project, no amendment would be necessary; however, if the City wanted to increase the budget by \$25,000, an amendment would be necessary.

A Substantial Amendment to the Action Plan will not be implemented until the conclusion of the 30-day comment period. A summary of all comments or views received in writing, or orally, during the comment period, will be attached to the Substantial Amendment(s) upon submission to HUD

Changes in Federal Funding Level

Any changes in federal funding level after the Consolidated Plan’s draft comment period has expired and the resulting effect on the distribution of funds will not be considered an amendment or a substantial amendment.

Activities Exempt from Substantial Amendment Citizen Participation Requirements

It may be necessary to amend the Consolidated Plan in the event of an emergency such as a natural disaster. These amendments may include funding new activities and / or the

reprogramming of funds including canceling activities to meet community development needs that have a particular urgency. Therefore, the City of Jonesboro, acting through the Grants and Community Development Department may utilize its CDBG funds to meet an urgent need without the normal public comment period, which is otherwise required for substantial amendments.

To comply with the national objective of meeting community development needs having a particular urgency, an activity must alleviate existing conditions that the City of Jonesboro certifies:

- Pose a serious and immediate threat to the health and welfare of the community;
- Are of recent origin or recently became urgent;
- The City and the Grants and Community Development Department are unable to finance the activity on their own; and,
- Other resources of funding are not available to carry out the activity.

A condition will generally be considered to be of recent origin if it is developed or became critical within eighteen (18) months preceding the Grants and Community Development Department's certification.

Standard Amendments

“Standard amendments” are those that are not considered substantial in nature and pertain chiefly to minor administrative modifications of the programs. Thus, they do not require in-depth citizen participation.

The CAPER

Performance reports on programs covered by the Consolidated Plan are to be prepared by the Grants Administrator for annual submission to HUD within ninety (90) days of the start of each program year. Draft performance reports will be available upon written request. The draft performance report will be available for comment for no less than fifteen (15) days, and any public comments received in writing will be reported in an addendum to the final performance report.

Access to Records

To the extent allowed by law, interested citizens and organizations shall be afforded reasonable and timely access to records covering the preparation of the Consolidated Plan, project evaluation and selection, HUD's comments on the Plan and annual performance reports. In addition, projects covered by the Consolidated Plan, including activities undertaken in the previous five (5) years, will be available to any member of the public upon request. A complete file of citizen comments will also be available for review by interested parties. The public will be notified upon HUD's approval of the Consolidated Plan, and the Plan will be posted on the City's website.

Complaints and Grievances

Citizens, administering agencies and other interested parties may submit complaints and grievances regarding the Consolidated Plan. Complaints should be in writing, specific in their subject matter, and include facts to support allegations. The following are considered to constitute complaints to which a response letter is due:

- The administering agency has purportedly violated a provision of this Citizen Participation Plan;
- The administering agency has purportedly violated a provision of federal CDBG program regulations; and,
- The administering agency, or any of its contractors, has purportedly engaged in questionable practices resulting in waste, fraud or mismanagement of any program funds.

Residents may also present complaints and grievances orally or in writing at the community meetings and / or public hearings. All public comments, including complaints and grievances, made either orally or in writing with the thirty (30) day public comment period, will be included in the final Consolidated Plan. Such complaints or grievances shall be directed to the Consolidated Plan representative, the City's Grants Administrator.

Timely Response to Complaints or Grievances

Within fifteen (15) calendar days of receiving the complaint, the Grants Administrator shall discuss the matter with the Mayor and respond to the complainant in writing. A copy of the response from the Grants Administrator will be transmitted, concurrently, to the complainant and to the Mayor. If, due to unusual circumstances, the Grants Administrator finds that he / she is unable to meet the prescribed time limit, the limit may be extended by written notice to the complainant. The Grants Administrator's notice must include the reason for the extension and the date on which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

Public review materials and performance reports will include data, as appropriate under confidentiality regulations, on any written complaints received and how each was resolved.

Availability of the Citizen Participation Plan

Copies of the Citizen Participation Plan may be obtained by contacting the Grants Administrator at (870) 932.1052 or online at www.jonesboro.org. Upon request, the Grants Administrator will make the Citizen Participation Plan available in an alternative format accessible to persons with disabilities.

Definitions

Low Income Person: a member of a family that has an income equal to or less than the Section 8 very low-income limit established by HUD. Unrelated individuals shall be considered as one-person families for this purpose.

Low Income Household: a household having an income equal to or less than the Section 8 very low-income limit established by HUD.

Low and Moderate Income Person: a member of a family having an income equal to or less than the Section 8 low income limit established by HUD. Unrelated individuals will be considered as one-person families for this purpose.

Low and Moderate Income Household: a household having an income equal to or less than the Section 8 low income limit established by HUD.

Low and Moderate Income Area / Neighborhood: an area / neighborhood where at least 51% of the residents are low and moderate-income persons.