

# CITIZEN PARTICIPATION PLAN

For Federal Affordable Housing and Community Development Programs



*Upon request, this document will be provided in a format that accessible to persons with disabilities and persons with limited-English proficiency. The Idaho Department of Commerce and Idaho Housing and Finance Association prohibit discrimination based on race, color, nation origin, religion, sex, familial status, sexual orientation /identity, disability, and age in the HUD-CPD programs covered herein.*



## Table of Contents

<b>Introduction .....</b>	<b>3</b>
<b>Adopting a Citizen Participation Plan .....</b>	<b>4</b>
<b>Adopting a HUD-CPD Plan [24 CFR 91.115].....</b>	<b>4</b>
Comment Period .....	4
Consideration of Comments .....	4
Public Notification .....	4
Reasonable Accommodation.....	5
Complaint Procedure.....	5
Access to Records related to HUD-CPD Programs.....	6
Substantial Amendment.....	6
Supplemental Appropriation.....	6
<b>State of Idaho (Commerce) Department of Commerce-Community Development Block Grant (CDBG).....</b>	<b>7</b>
Technical Assistance .....	7
Local Governments .....	7
<b>Idaho Housing and Finance Association (HOME, HTF, ESG) .....</b>	<b>8</b>
Technical Assistance .....	8

## Introduction

Idaho receives approximately \$17 million in block grants annually from the U.S. Department of Housing and Urban Development (HUD) for affordable housing and community development programs: The Community Development Block Grant (CDBG), the Emergency Solutions Grant (ESG), National Housing Trust Fund (HTF), HOME Investment Partnerships Program (HOME) and the Neighborhood Stabilization Program (NSP receives no new funding from HUD).

HUD-CPD Grantees are the Idaho Housing and Finance Association (for HOME, HTF, NSP, and ESG programs) and the Idaho Department of Commerce (CDBG program). HUD-CPD refers to IHFA and Commerce collectively as the "State". The State's CDBG program funds are not awarded to HUD-designated "Entitlement Areas".

The Idaho Citizen Participation plan contains policies and procedures for public involvement in the Department of Housing and Urban Development's (HUD) Consolidated Plan process, in accordance with 24 CFR 91.

The Consolidated Plan is a planning tool to address identified needs in the areas of housing, homelessness and community and economic development. These programs improve communities by providing access to affordable, quality housing, suitable living environment and expanding economic opportunities.

The Consolidated Plan includes:

- Summarization of Idaho's affordable housing and community development needs.
- Program allocation amounts and annual goals, strategies, proposed method of distribution, planned activities and anticipated outcomes to benefit persons of low- and moderate-income and minimize displacement of persons and to assist any persons displaced.
- Annual reporting of grantee's yearly program outcomes as they relate to the goals and strategies identified in the planning process.

IHFA as the lead agency will ensure the Consolidated Plan process is followed and will work with the Idaho Department of Commerce to complete and submit each document required by HUD. The following documents are part of the Consolidated Plan process:

- Consolidated Plan, required every five (5) years.
- Analysis of Impediments to Fair housing (AI), required every five (5) years
- Annual Action Plan, required every (1) year.
- Consolidated Annual Performance and Evaluation Report (CAPER), required every (1) year.

Public participation is encouraged, with particular emphasis on participation by persons of low and moderate income, and residents of slum, and blighted areas in which funds are proposed to be used in conjunction with the development and revisions of the Consolidated Plan, AI, Annual Action Plans and Annual Performance and Evaluation Reports.

## **Adopting a Citizen Participation Plan**

HUD-CPD requires its grantees to adopt a plan that identifies how they will inform citizens and other interested parties of the opportunity to review and provide comment regarding proposed or amended HUD-CPD plans (see definition of Substantial Amendment). Before a plan is submitted to HUD-CPD, it is adopted, following a process. This process is called the Citizen Participation Plan (CPP).

When this Citizen Participation Plan is amended, grantee will provide a 30-day comment period in which to allow interested parties to provide comment regarding the amendment. The notice for the 30-day comment period will be published in Idaho's major newspapers and posted on grantees' website.

## **Adopting a HUD-CPD Plan [24 CFR 91.115]**

### **Comment Period**

The process includes a minimum of one (1) comment period and one (1) public hearing to allow Idaho's citizens, agencies, local units of government, private entities, and other interested parties to review the draft plan and submit comment.

Individual Plan requirements:

1. Five-Year Consolidated Plan and Annual Action Plan- Requires a period of not less than thirty (30) days to receive comments on the final plan prior to being submitted to HUD [§91.115(b)(3)].
2. Consolidated Annual Performance Evaluation Report (CAPER)- Requires a period of not less than fifteen (15) days to receive comments on the performance report that is to be submitted to HUD [§91.115(d)(1)].

**Note:** During a Federal or State declared emergency the public comment period pertaining to a HUD-CPD Plan may be reduced or eliminated as directed or approved by HUD.

### **Consideration of Comments**

Grantees are required to consider all public comments received during the comment period related to the proposed plan. A summary of comments and the grantees response to any comments will be attached to the final submitted plan.

### **Public Notification**

Grantees will notify the public of a comment period by publishing a legal notice in Idaho's major newspapers, email distribution lists relating to all referenced programs, posting a copy of the legal notice at IHFA offices, and the IHFA and Idaho Department of Commerce's websites.

The legal notice will be published twice; prior to the beginning of the comment period, and prior to the public hearing. A legal notice will include the following information:

- The beginning and ending date of the public comment period
- A statement in Spanish that directs the reader to the Spanish version of the legal notice
- Where the plan is available
- How to request the plan in a form that is accessible to persons with disabilities
- How to request the plan in an alternative format for persons with limited English proficiency
- How and where to submit comment
- Date, time, and place of the public hearing
- How to request a reasonable accommodation for the public hearing

### **Reasonable Accommodation**

A reasonable accommodation request is available to persons with physical, visual, and/or hearing impairments and persons with limited- English proficiency. All requests should be submitted at least 10 business days prior to the public hearing or the end of the comment period to [grantpubliccomment@ihfa.org](mailto:grantpubliccomment@ihfa.org) or mail: HOME Programs Administrative Assistant @ IHFA, P.O. Box 9405, Boise, Idaho, 83707-1899. Additionally, the Grantees will determine how to meet the needs of non-English speaking residents will be met in the case of public participation hearings or meetings where a significant number of non-English speaking residents can be reasonably expected to participate.

All public hearings will either be held at a location and time that is reasonable and handicap assessable and/or via a video teleconferencing meeting i.e. Zoom, GoToMeeting or a similar service.

### **Complaint Procedure**

The public may send written complaints related to any of the Consolidated Plan documents and reports. Complaints will be accepted by the contacts listed on the legal notice. A written response will be issued within 15 working days where practicable.

- A written complaint or grievance is normal notification of a concern, allegation or protest to a proper authority. A formal complaint will be considered filed at the time it is delivered to the appropriate authority's office. The complaint should be clear and concise and include the following information:
  1. Identification of the project and project location;
  2. The reason for the complaint;
  3. Sufficient data or evidence to substantiate a claim(s) or charge(s). If possible, supporting documentation should be included.
  4. If desired, complainant may propose a solution or resolution to the problem.

- If the complainant feels the response is unsatisfactory, they may appeal for a review of the complaint for resolution. Additional information may be requested at that time. Every effort will be made to provide a full response within thirty (30) days.
- If valid and sufficient data has been provided to substantiate the complaint, an investigation will be conducted. The extent of any investigation depends on the scope and depth of the issues involved.

### **Access to Records related to HUD-CPD Programs**

Reasonable and timely access to information and records related to the consolidated plan regarding the use of assistance during the preceding five years will be given to the public, public agencies, and other interested parties. The State's Five-Year Consolidated Plan and related annual plans, reports, and substantial amendments will be available online.

### **Substantial Amendment**

Substantial amendment is defined as a significant alteration to the focus, priority(s), action(s), or strategy(s) in the current Five-Year Consolidated Plan and/or the Annual Action Plan.

Examples:

- A change in allocation priorities, or the method of distribution of funds
- An activity that is not identified in the current Five-Year Consolidated Plan
- A variance in a specific program's funding allocation that exceeds 25% of the annual average of previous years of the Five-Year Consolidated Plan in effect at the time of the allocation.
- A change in the purpose, scope, or location of a specific program
- A change in a program's intended beneficiaries

### **Supplemental Appropriation**

The plan assumes that public review requirements for supplemental appropriations will be described and defined as part of any such specific appropriation. A supplemental appropriation outside the normal scope of activities may supersede this plan and/or be accompanied by requirements that are specific to the appropriation.

## **State of Idaho (Commerce) Department of Commerce-Community Development Block Grant (CDBG)**

### **Technical Assistance**

Commerce provides technical assistance to communities and groups about the CDBG program and developing a CDBG application. Commerce also provides ongoing technical assistance to open CDBG projects.

- Communities and groups will be notified of the CDBG application process and schedule,
- Regional workshops may be conducted to educate and instruct local communities about the application process.
- Commerce has developed and makes available a CDBG Application Handbook.
- Commerce staff is available to provide technical assistance when needed.

### **Local Governments**

CDBG applicants shall be required to formally adopt a Commerce-approved public participation plan and do the following:

- A copy of the Public Participation Plan must be submitted with the CDBG application.
- A public hearing shall be required to permit public review of the CDBG application.
- A minimum of two public hearings must be held. The first is held prior to application submission, and the second is held during project construction.
- Public hearings are required to be scheduled in ways and at a time, that facilitates full participation. A public hearing shall be held at times and locations which are reasonable and accessible.
- Proper notification is required by public advertisement in a local newspaper or other approved media no less than seven (7) days prior to the public hearing date. For those localities where there is no local newspaper. Public notification must be through some other acceptable method where there is wide distribution to all citizens within the community. This method must be approved by Commerce.
- The information included in the public notice and public hearing minutes is specified in the CDBG rules and must be included in the CDBG application.
- Identify how the needs of non-English speaking residents in the community are being met.

## **Idaho Housing and Finance Association (HOME, HTF, ESG)**

Participation is further encouraged through regular regional housing and homelessness stakeholder meetings, monthly Idaho Balance of State Continuum of Care committee meetings, quarterly Continuum of Care open board meetings, and annual regional Housing Roundtable meetings.

### **Technical Assistance**

IHFA provides technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals, with the level and type of assistance to be determined by IHFA.

- Groups' representative of persons of low and moderate income shall be notified of the HOME/HTF application process and schedule.
- Statewide workshops may be conducted to acquaint local homeless service providers with the ESG application process and schedule.
- IHFA shall develop and make available application and program guidance.
- IHFA staff shall be available to provide technical assistance as needed. Additional technical assistance materials shall be developed and provided when determined practicable.