

# Citizen's Participation Plan



## **Revision Summary**

The CARES Act made available additional funding in Community Development Block Grant Coronavirus (CDBG-CV) funds. The CARES Act adds additional flexibility for both the CDBG-CV grant and, in some cases, for the annual HUD FY2020/City's FY2021 CDBG grants in these unprecedented times. The public comment period is reduced to not less than 5 days, grantees may use virtual public hearings when necessary for public health reasons, the public services cap is suspended during the emergency, and States and local governments may reimburse costs of eligible activities incurred for pandemic response regardless of the date.

In addition, the CARES Act authorizes the Secretary to grant waivers and alternative requirements of statutes and regulations the Secretary administers in connection with the use of CDBG-CV funds and HUD fiscal year 2019 and 2020 CDBG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). Waivers and alternative requirements can be granted when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.

**These edits do not change current citizen participation policies but have been modified to allow for necessary expedited actions during times of declared disaster or emergencies.**

## **Citizen's Participation Plan**

### **Summary:**

The City of Clarksville's Office of Housing and Community Development Department coordinates the planning and administration of Community Development Block Grant (CDBG) and HOME Investment Partnership Funds. As an entitlement jurisdiction, the Office of Housing and Community Development provides structure and shapes programmatic services for low-to-moderate income households. In order to meet local capacity, the Office of Housing and Community Development partners with nonprofits, Community Housing Development Organizations (CHDOs), City departments, contractors, faith-based organizations, lenders, and charities. The Office of Housing and Community Development connects resources to redevelop and revitalize Clarksville's lower income neighborhoods.

### **Citizen Participation**

The City of Clarksville's Citizen's Participation Plan (CPP) is designed to ensure citizen participation in all of the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) and Emergency Shelter Grant (ESG) funded program areas and to meet the requirements set forth in Section 104 of the 1974 Housing and Community Development Act, as amended, and 24 CFR 91 to provide for citizen involvement in the planning and implementation of the City of Clarksville's Community Development Program. This Plan is an essential element of Clarksville's present and future community development process and has been developed to comply with the regulations and requirements of the CDBG program.

The CPP ensures continuity of citizen involvement in the planning, development, implementation and assessment of programs funded through the Office of Housing and Community Development. The plan's intent is to provide citizens with a better understanding of their role in the process and the steps they can take to become more active in all aspects of the City's Community Development Program. The Citizen Participation Plan is periodically reviewed and updated to reflect any changes.

The Plan encourages citizen input, particularly for the City's low-to-moderate income persons. The Office of Housing and Community Development programs and services benefit Clarksville's low-to-moderate individuals and neighborhoods. The neighborhoods are termed "Target Neighborhoods". The Office of Housing and Community Development strives to encourage full participation of residents in the process of developing and implementing the Consolidated and Annual Action Plans, CAPER, and any neighborhood plans.

The primary goal of the Citizen Participation Plan is to provide all citizens of the community with adequate opportunity to participate in the planning, implementation, and assessment of the Clarksville 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.

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

**The City of Clarksville's Plan:**

1. Provides for and encourages citizen participation, with particular emphasis on participation by people of low and moderate income who are residents of slum and blighted areas and areas where CDBG, HOME and/or ESG funds are proposed to be used.
2. Provides citizens with reasonable and timely access to meetings, information and records relating to the City's proposed use of funds.
3. Provides for technical assistance to groups representative of people of low and moderate income that request such assistance in developing proposals.
4. Provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities and the review of program performance.

This plan in no way will restrict the responsibility and authority of City officials for the development of annual applications for funding from the U.S. Department of Housing and Urban Development or with the execution of the Community Development Program. The Mayor shall be the grantee recipient and the City of Clarksville Office of Housing and Community Development shall administer the program.

**Participation:**

All phases of citizen participation will be conducted in an open manner, with freedom access for all interested parties. Public hearings will be publicized and pertinent information will be available to the public. Details will be available upon request at the City of Clarksville Office of Housing and Community Development, One Public Square, Suite 201, Clarksville, TN 37040, Monday through Friday from 8:00 a.m. until 4:30 p.m. or by calling 931-648-6133.

The city will consult with and notify other local units of government with regard to the Community Development Program as appropriate to ensure effective planning and implementation of community development activities.

To ensure citizen participation a citizen's advisory committee is established by this Citizen's Participation Plan.

## **Citizen's Advisory Committee**

The role of the Citizen's Advisory Committee (CAC) is to provide citizen participation to include citizens of low and moderate income who live in areas where community development funds are to be used, in planning and evaluation of the City's community development program. The CAC will also be used to help assess community needs, inform other citizens about the CDBG program and to provide citizen input in the development of the City's Consolidated Plan every five years.

## **Roles and Responsibilities of Advisory Committee**

The role of the Citizen's Advisory Committee is to provide citizen participation in the Community Development Programs and to provide a meaningful avenue for residents of low and moderate income neighborhoods or those living in slum and blighted areas to be involved in the program.

### **Specific responsibilities of committee members are:**

1. Provide a means of citizen participation in all community development programs.
2. Assist staff in assessing community needs which may be addressed with community development funds.
3. Advise on possible uses of funds.
4. Comment, as appropriate, on the City's Consolidated Plan, plan amendments and the annual performance report.
5. Assist staff in marketing the programs to the community.
6. Assist in reviewing the performance and effectiveness of the Community Development Program.

## **Public Hearings**

The City of Clarksville complies with federal regulations and encourages citizen participation in the program by holding a minimum of two public hearings annually to obtain citizen views and respond to proposals and questions at various stages in the development of the Community Development Program.

It is the policy of the City of Clarksville to give citizens reasonable and timely access to local meetings, information, performance reports, and records relating to the City's proposed and actual use of Community Development Block Grant and HOME Investment Partnership Funds. All meetings are advertised locally in the non-legal section of the Leaf Chronicle newspaper, Public Housing Newsletters and other publications, as necessary. The advertisements are placed

in the newspaper at least 7 days prior to the hearings and no more than two weeks prior to each meeting. All Public Hearings will be held in the evening for the convenience of those working during the day.

In the event of a local, state or federally declared disaster or emergency where public places may be closed to the public or in-person participation may not be feasible or large gatherings may be considered a public health risk, the city may opt to conduct public hearings and meetings virtually via conference call or live web-streaming with ability to ask questions and provide comments in real time. Accommodations will be made with disabilities upon request. Documents for public review will be shared via the City's website. Copies of the document may be mailed or emailed upon request. The public comment and display period shall be no less than **five days**.

All meetings are accessible to persons with disabilities. Translation and Interpretation Services: If non-English speaking or hearing-impaired residents request assistance to participate in a public hearing, Agency staff will retain appropriate assistance to allow such residents to participate. Generally, assistance will consist of obtaining appropriate interpreter services, the Agency will consider it mandatory only in instances where it is expected that a significant number of non-English speaking or hearing-impaired residents will be in attendance. Persons needing special accommodations or translators should make their requests one week before the meeting so the City can assure that the special needs are met. These requests should be made to the Office of Housing and Community Development 931-648-6133.

Details regarding meetings are also available upon request at the City of Clarksville Office of Housing and Community Development located at One Public Square, Suite 201, Clarksville, TN 37040, Monday-Friday from 8:00 a.m. until 4:30 p.m. 931-648-6133.

### **Access to Information and Records**

The City of Clarksville's Citizen Participation Plan is available for public review on the City's web site, [www.cityofclarksville.com](http://www.cityofclarksville.com)), Click on the Community Development Link. It is also available at the Community Development Office, City Hall, One Public Square, Suite 201, Clarksville, TN 37040 and in the reference section of the Clarksville-Montgomery County Public Library located at 350 Pageant Lane, Clarksville, TN. The Community Development office hours are 8:00 a.m. to 4:30 p.m., Monday through Friday. Copies can be requested by mail or phone. Residents can call 931-648-6133 or mail request to City of Clarksville, Office of Housing and Community Development, One Public Square, Suite 201, Clarksville, TN 37040. Information and records open to the public are available at the Office of Housing and Community Development located at One Public Square, Suite 201, Clarksville, TN. The public cannot review confidential materials. Those materials include citizen's personal identity information

### **Complaints and Grievances**

Complaints and grievances are handled in a timely and professional manner. The Community Development Director reviews all complaints. A response is prepared in an effort to address the complaint. Written responses to complaints regarding the Consolidated Plan, Annual Action Plan, CAPER, amendments, and general grievances will be made within fifteen (15) days after receipt of the complaint. Written grievances should be addressed to: City of Clarksville Office of Housing and Community Development One Public Square, Suite 201, Clarksville, TN 37040.

### **Technical Assistance**

Technical Assistance is provided upon request. Assistance may include information on housing, demographics, and explanation of Community Development's programs and services. Community Development staff works closely with the neighborhood associations to foster community pride and empowerment.

The City routinely issues Request for Proposals (RFP) for services that support its goals and

programs. Funding applications are made available upon request, announced in media outlets, and mailed to existing and potential partner agencies. Staff announces and facilitates funding workshops to assist potential applicants. The Citizen's Advisory Committee (CAC) reviews and evaluates these applications to help determine funding allocations and provide feedback.

### **Consolidated Plan Process**

The City prepares a consolidated plan in accordance with 24 CFR 91. These are the regulations that govern the consolidated submission for community planning and development programs. This is the regulation that mandates a planning process that includes an analysis of housing and community development needs a five-year strategic plan for meeting those needs and an annual action plan for the use of the funds. The first consolidated plan went into effect as of fiscal year 1995, beginning July 1, 1995.

### **Analysis of Housing and Community Development Needs**

This is an ongoing function. Whenever possible, local planning processes that provide for citizen input will be used to help establish community needs.

### **Five-Year Strategic Plan**

The Five-Year plan builds on the results of community-wide needs assessments. Priorities are established with citizen input and serve as a guide to the development of the annual action plans.

### **Annual Action Plan**

Prior to submission of the annual action plan for the use of funds, the City of Clarksville will follow the process described below:

1. Staff and Advisory Committee will review the results of the local needs assessment from the public at large and the Five-Year Plan goals.
2. At least one public hearing will be held to solicit input on community needs.
3. The City will provide information on the projected funding to be received, activities to be undertaken and the amount of benefit to LMI and plans to minimize displacement of citizens.
4. The city will solicit proposals for activities consistent with the plans and goals outlined in the Consolidated Plan.

5. The proposed action plan will be developed, published and made available to the public for thirty days to allow for citizen review and comment prior to the submission of the final plan to HUD. The City may, if appropriate, modify the action plan after considering public comment.

A copy of the action plan will be placed for public review in the Office of Housing and Community Development and the Public Library, electronically on the City's Website and citizens may request a copy of the plan by contacting the Office of Housing and Community Development, One Public Square, Suite 201, Clarksville, TN 37040 or by calling 931-648-6133.

A newspaper notice will inform the public of any plan amendments and of performance reports on the program. The public will have 30 days prior to submission to HUD to comment on any such amendment or performance report.

In the event of a local, state or federally declared disaster or emergency where public places may be closed to the public or in-person participation may not be feasible or large gatherings may be considered a public health risk, the city may opt to conduct public hearings and meetings virtually via conference call or live web-streaming with ability to ask questions and provide comments in real time. Accommodations will be made for persons with disabilities upon request. Documents for public review will be shared via the City's website. Copies of the document may be mailed or e-mailed upon request. The public comment and display period for any Substantial Amendment shall be no less than **five days**.

### **Project Amendments and revisions**

The City of Clarksville, under certain circumstances, may amend its Consolidated Plan and Annual Action Plans. An amendment can occur after the public hearing or the plan has been adopted by City Council. If the City makes a significant revision or decides not to implement an activity stated in the Consolidated or Annual Action Plan, implements a new CDBG or HOME Activity, or makes a substantial change in the scope of a proposed activity, an amendment is required. According to 24 CFR 570.463 the City must submit the revisions to the HUD area office. The applicant also must hold at least one public hearing prior to making a significant revision to the application.

A significant revision involves new activities or alterations that change the scope, location, scale, or beneficiaries of such activities or which, as a result of a number of smaller changes, add up to an amount that exceeds (10) ten percent of the current year's CDBG or HOME budget.

Budget transfers within accounts of the same project budget are not considered substantial and not require public notice. Budget transfers less than ten (10) percent of the current year's Community Development Budget from one project to another do not require public notice.

To assure citizen participation on program amendments the City of Clarksville will publish and post its public notice announcing the proposed change(s). The process allows the public a 30-day comment period. After considering public comments received in writing or orally, the Community Development Director and Finance Officer will determine which changes require Finance Committee and City Council approval. Once changes have been adopted, the City will submit to HUD a description of the adopted changes. A summary of any public comments or views will be attached to the amendment. The letter advising HUD of the change will require the signature of the City Mayor.

- **Disaster/Emergency events that may require expedited substantial amendments**  
It may be necessary to expedite substantial amendment to the Consolidated Plan in the event of a declared disaster or emergency. These expedited substantial amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet needs resulting from a declared disaster or emergency. Therefore, the City of Clarksville may utilize CDBG funds to meet these needs with a **5-day public comment period** instead of a 30-day public comment period, which is otherwise required for substantial amendments.

## **Conflict of Interest**

In accordance with HUD regulations 24 CFR 570.611, no persons who exercise or have exercised any functions or responsibilities with respect to community development activities assisted under this part or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain personal or financial interest or benefit from a community development assisted activity, or have an interest in any contract, subcontractor or agreement with respect thereto, or the proceeds hereunder, either for themselves or those with whom they have family or business ties, during their tenure for one year thereafter.

## **Anti-Displacement**

It is the policy of the City of Clarksville to make reasonable efforts to ensure that all activities undertaken with CDBG and HOME Program funds will not cause unnecessary displacement. The City will continue to administer the CDBG and HOME Programs in such a manner that careful consideration is given during the planning phase to avoiding displacement. Displacement of any nature shall be reserved as a last resort action necessitated only when no other alternative is available and when the activity is determined necessary in order to carry out a specific goal or objective that is of benefit to the public.

If displacement is precipitated by activities that require acquisition (either in whole or in part) or rehabilitation of real property directly by the City of Clarksville or an agent, all appropriate benefits as required by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and amendments. The "Uniform Act" or the Residential Anti-displacement and Relocation Assistance Plan under Section 104 (d) shall be provided to the displaced person or persons. Information about these programs will be provided to all persons who may potentially be displaced in the form of informational brochures on these programs and explained in detail by the City's housing staff.

These policies are more specifically outlined in the City's Community Development Displacement Relocation Policy which details the Residential Anti-Displacement and Relocation Assistance Plan. This document is available for public review in the Office of Housing and Community Development, One Public Square, Suite 201, Clarksville, TN 37040 from 8:00 a.m. to 4:30 p.m., Monday through Friday.

## **GLOSSARY OF TERMS**

**Annual Action Plan-** The one-year portion of a PJ's Consolidated Plan (see definition of "Consolidated Plan"). It includes the PJ's annual application for HOME funds.

**Citizen Participation Plan-** A plan that must be developed by all PJ's to describe and document efforts that will be undertaken to provide for and encourage citizens to participate in the development of the Consolidated Plan, any substantial amendments to the Consolidated Plan, and the performance report.

**Community Development Block Grant Program (CDBG)** A Federal program created under the Housing and Community Development Act of 1974. This program provides grants funds to local and State governments to be used to develop viable urban communities by providing decent housing with a suitable living environment and expanding economic opportunities to assist low- and moderate-income residents. CDBG replaced several categorical grant programs such as the Model Cities Program, the Urban Renewal Program and the Housing Rehabilitation Loan and Grant Program.

**Community Housing Development Organizations (CHDO)** - CHDOs are housing nonprofit organizations that meet certain requirements set forth by HUD under the HOME program. The federal government requires the City to set aside 15% of its HOME Program allocation for CHDOs.

**Consolidated Annual Performance and Evaluation Report (CAPER)** - This report describes the accomplishments of the City's CDBG, HOME and ESG programs at the end of each fiscal year. The Plan is an assessment of the City's progress in accomplishing the goals of the Annual Action Plan and the Consolidated Plan. There is also a discussion of some of the additional funds that the City has accessed during the year to leverage the HUD funding.

**Consolidated Plan** - The City is required to prepare a five-year Consolidated Plan to receive Community Development Block Grant (CDBG) and HOME Investment Partnership Funds. The Plan includes a description of the housing and community development needs of the City, the City's priorities given the limited financial resources available to the City, and a strategy toward addressing those needs.

**HOME Investment Partnerships Program-**A Federal grant program designed to help jurisdictions expand the supply of decent and affordable rental and ownership housing for low- and very low-income veterans.

**Participating Jurisdiction-** The term given to any State or local government that HUD has designated to administer a HOME Program. HUD designation as a PJ occurs if a State or local government meets the funding thresholds, notifies HUD that it intends to participate in the program, and obtains approval by HUD of a Consolidated Plan.