

State of Vermont Citizen Participation Plan for the use of CDBG, HOME, ESG, HTF, and HOPWA funds

Updated April 20, 2020
For COVID-19 Waivers

The Department of Housing and Community Development (DHCD) on behalf of the State of Vermont (state), on this 20th day of April 2020, hereby adopts the following Citizen Participation Plan in accordance with *Availability of Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19, dated March 31, 2020, as amended to add paragraph number 7 under Public Hearing to add Waiver #9 of the Available Waivers. In addition, amended, to add paragraph number 6 under Development of the Consolidated Plan, and add paragraph number 5 under Amendments to the Consolidated Plan to add Waiver #8 of the Available Waivers. Further, to add paragraph number 10 under Citizen Participation Requirements for Units of General Local Governments to add Waiver #9.*

This plan is developed to encourage citizen participation in the development of the consolidated plan, any substantial amendments to the consolidated plan and the performance report. It is designed especially to encourage participation by low and moderate income persons, particularly those living in slum and blighted areas and in areas where Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), McKinney Vento Homeless Program for the Emergency Solutions Grant (ESG), the Housing Trust Fund (HTF), and Housing Opportunities for people with AIDS (HOPWA) funds are proposed to be used, and by residents of predominantly low and moderate income neighborhoods, as defined by the jurisdiction.

The DHCD will provide citizens with a reasonable opportunity to comment on the original citizen participation plan and on substantial amendments to the citizen participation plan and will make the plan available for public review. Upon request, the plan will be made available in an accessible format to persons with disabilities.

The DHCD will encourage participation by residents of public and assisted housing developments in the process of developing and implementing the consolidated plan, along with other low-income residents of targeted revitalization areas in which the developments are located.

Public Hearings

1. The DHCD will hold at least two public hearings during the year to obtain citizen's views about housing and community development needs, development of proposed activities and review of program performance. At least one public hearing will be held to obtain the views of citizens on housing and community development needs (including priority nonhousing community development needs) before the Consolidated Plan is published for comment.
2. The DHCD will ensure adequate public notice before each public hearing, with sufficient information published about the subject of the hearing to permit informed comment. Public

hearings will be announced in the newspaper, posted to the DHCD website, and e-mailed to our "All Interested Parties" List. By State law Citizens will be notified of the public hearings at least fifteen (15) days prior to a public hearing being held.

3. Advanced public notice will also be given of all public meetings relating to the Consolidated Plan and performance progress, such as those of the Consolidated Plan Advisory Board.
4. The DHCD will hold all public hearings at times and locations convenient to potential and actual beneficiaries, and accommodations will be made for people with disabilities. All hearings will be held in accessible locations, and sign language interpreters will be made available upon advance request.
5. The DHCD will provide interpretation services for non-English speaking residents at public hearings upon advance request, provided such services are available in the community.
6. In the event of a Disaster, Health Crisis considered a State of Emergency or Pandemic, DHCD will conduct virtual public hearings where the possibility no public attendance is permitted. The public notice will provide the details how to access the virtual hearing, along with providing accommodations for the hearing impaired and non-English speaking Citizens.
7. **In the event of a Disaster, Health Crisis considered a State of Emergency or Pandemic, the Notice period for the Virtual Public Hearing(s) need only be for a period of not less than 5 days.**

Development of the Consolidated Plan

1. The STATE, through DHCD, will make a concerted effort to notify citizens, agencies and organizations of the development of the consolidated plan and the availability of CDBG, HOME, ESG, HTF and HOPWA funds through mailings, postings and public notices in the newspaper.
2. DHCD will conduct outreach meetings at various and convenient times to inform and educate citizens on the development of the Consolidated Plan and the availability of funds. DHCD will provide technical assistance to all applicants, with special efforts to assist in the development of applications for funding - particularly predominately low and moderate-income neighborhoods. Citizens will be encouraged to discuss the various activities funded by CDBG, HOME, ESG, HTF and HOPWA grants, and other Federal HUD programs.
3. Before the DHCD adopts the Consolidated Plan, the DHCD will make available to citizens, public agencies and other interested parties information that includes the amount of assistance the DHCD 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.
4. The DHCD will publish its proposed Consolidated Plan for review and comment. The DHCD will publish a newspaper summary describing the contents and purpose of the Consolidated Plan and listing the locations where the entire plan may be examined. The entire plan will be made available for review and examination on the website at <http://accd.vermont.gov>.

5. The DHCD will receive and consider comments on the proposed Consolidated Plan for 30 days before preparing the final Consolidated Plan to be submitted to HUD.
6. **In the event of a Disaster, Health Crisis considered a State of Emergency or Pandemic, the DHCD will receive and consider comments on substantial amendments to the Consolidated Plan for a period of not less than 5 days.**

Amendments to the Consolidated Plan

1. The DHCD will amend its approved Consolidated Plan whenever it makes one of the following decisions:
 - a. To make a substantial amendment in allocation priorities or a substantial amendment in the method of distribution of funds;
 - b. To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income) not previously described in the action plan; or
 - c. To substantially amend the purpose, scope, location or beneficiaries of an activity.
2. "Substantial amendment" is defined as a change in a planned or actual activity proposed after the official adoption of the Consolidated Plan that affects 10% or more of the State's current annual allocation of CDBG, HOME, ESG, HTF, or HOPWA funds.
3. Substantial amendments to the approved Consolidated Plan must be authorized by the Secretary of the Agency of Commerce and Community Development and will be made public by postings and public notices in the newspaper.
4. The DHCD will receive and consider comments on substantial amendments to the Consolidated Plan for 30 days before implementing those amendments.
5. **In the event of a Disaster, Health Crisis considered a State of Emergency or Pandemic, the DHCD will receive and consider comments on substantial amendments to the Consolidated Plan for a period of not less than 5 days.**

Performance Reports

1. The DHCD will prepare a performance report each year on the progress of the Consolidated Plan in accordance with the requirements of the U.S. Department of Housing & Urban Development.
2. Citizens will be afforded notice of the performance report through posting and newspapers. The performance report will be available at the DHCD website at <http://accd.vermont.gov> for review, and will be e-mailed to all members of the Consolidated Plan Advisory Board who request a copy, and to any citizen who may request a copy.
3. The DHCD will receive and consider comments on the performance report for 15 days before the report is submitted to HUD.

Citizen Participation Requirements for Units of General Local Governments

The DHCD will ensure that the Units of General Local Government adhere to the citizen participation requirements as stated at §91.115(e) to provide for and encourage to the greatest extent possible participation by low and moderate-income persons located in areas in which CDBG, HOME, ESG, HTF and HOPWA funds are proposed to be used.

Units of General Local Government shall provide the citizens with the following:

1. The amount of funding expected to be made available, the types of activities that may be undertaken, and the amount of funds to be used to meet the National Objective of benefit to low and moderate income individuals as stated in the Consolidated Plan;
2. The Anti-displacement and Relocation Plans as required under §570.488, and these Plans are required to be filed with the Agency at the time of application of funding requests;
3. Technical assistance to persons of low and moderate income that request assistance in developing proposals in accordance with the application procedures developed by the STATE;
4. Conduct public hearings in a manner to meet the needs of non-English speaking residents where a significant number of non-English speaking residents are anticipated to participate;
5. Conduct two public hearings: the first hearing shall be held 5 days prior to submission of an application to the STATE for funding, and the second hearing shall be held 15 days prior to the Completion Date of a grant agreement/project;
6. With a 15-day advance notice of holding public hearings, and the notice shall provide sufficient information on the proposed project to allow for informed comment and attendance to the hearing;
7. Conduct another hearing in the event there is any substantial change to the proposed purpose, scope of work, location, or designated beneficiaries; and
8. With a formal process to submit complaints and grievances, and timely written responses to written complaints and grievances within 15 working days.
9. In the event of a Disaster, Health Crisis considered a State of Emergency or Pandemic, DHCD will conduct virtual public hearings where the possibility no public attendance is permitted. The public notice will provide the details how to access the virtual hearing, along with providing accommodations for the hearing impaired and non-English speaking Citizens.
- 10. In the event of a Disaster, Health Crisis considered a State of Emergency or Pandemic, the Notice period for the Virtual Public Hearing(s) need only be for a period of not less than 5 days.**

Access to Information and Records

1. The state, through DHCD, will provide citizens, public agencies and other interested parties with reasonable and timely access to information and records relating to the STATE's Consolidated Plan and the STATE's use of funds under the CDBG, HOME, ESG, HTF and HOPWA programs during the preceding five years.
2. The STATE, through DHCD, will regularly communicate with citizens and applicants for CDBG, HOME, ESG, HTF and HOPWA funds regarding the progress of the Consolidated Plan. Representatives of the Consolidated Plan Advisory Board will be encouraged to communicate with their local constituents on the progress of the Advisory Board.

Comments and Complaints

1. The DHCD will consider any comments or views of citizens received in writing, or orally at public hearings, in preparing this Citizen Participation Plan, the final Consolidated Plan, substantial amendments to either Plan, and the annual performance reports. A summary of these comments or views will be attached to the Citizen Participation Plan, the final Consolidated Plan, substantial amendment or performance report.
2. The STATE, through DHCD, will respond to written complaints received by DHCD relating to the Consolidated Plan, any amendments to the Plan, and the annual performance reports. Upon request, DHCD will transcribe oral complaints for signature by the complaining person or organization. Where practicable, DHCD will respond to complaints within 15 working days of receiving the written complaint.