



City of Greensboro Citizen Participation Plan

Introduction

The purpose of the Citizen Participation Plan (CPP) is to identify and set forth guidelines that the City of Greensboro Department of Neighborhood Development will follow to ensure that the residents of Greensboro are adequately aware of the programs/activities financed with entitlement funding from the United States Department of Housing and Urban Development (HUD).

This CPP is revised to establish expedited procedures to draft, propose, and/or amend consolidated plans as a result of COVID-19 impacts and the Coronavirus Aid, Relief, and Economic Security (CARES) Act per:

- **HUD Federal Register 6218-N-01: *Notice of Program Rules, Waivers, and Alternative Requirements Under the CARES Act for CDBG-CV Grants, FY 2019 and 2020 CDBG Grants, and for Other Formula Programs; and***
- **HUD Memorandum: *Waiver of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Allow for Virtual Public Hearings in the Preparation of FY 2021 Consolidated Plans and Annual Action Plans.***

These processes involve the use of federal program dollars from such programs as Community Development Block Grant (CDBG), Home Investment Partnership Program (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for People with AIDS (HOPWA). Additionally, HUD has allocated special funds to the City of Greensboro, as authorized by the CARES Act, Public Law 116-136, to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19).

In carrying out these requirements the City of Greensboro understands that participation on the part of its citizens, organizations, businesses and other stakeholders is vital to the effectiveness of all Consolidated Plan activities. All persons, but especially very low-, low- and moderate-income persons, particularly those living where funds are proposed to be used, can actively participate in the planning, implementation, and assessment of such activities.

This CPP is effective as of March 2, 2021 and remains in effect until superseded by a new plan. This CPP also supersedes any CPP that may have been in effect prior to March 2, 2021.

The CPP will be available in English and Spanish. Residents that require materials in other languages are encouraged to contact Neighborhood Development staff via voice at 336-373-2349, fax at 336-412-6315, or email at Caitlin.Bowers@greensboro-nc.gov.

The Consolidated Plan

The Consolidated Plan is a document, developed through a collaborative effort of residents, organizations and city staff, which lays out a five-year course of action for community revitalization. The City of Greensboro encourages residents to become involved in the development of the Consolidated Plan. There are opportunities to serve on committees, to offer input during public hearings, to submit written comments, and to develop proposals to request funds for carrying out housing and community development activities. The Consolidated Plan is also the means to satisfy HUD's application requirements for the CDBG, HOME, ESG, and HOPWA Programs. Greensboro's Consolidated Plan states specifically how the City will meet HUD's statutory program goals to provide decent housing, suitable living environments, and expanded economic opportunities. Formal approval by the Greensboro City Council is required for a final Consolidated Plan. The Consolidated Plan is due to HUD every five years, 45 days prior to the end of the City's fiscal year. Greensboro's Consolidated Plan must be submitted to HUD by May 15 every fifth year.

The Annual Action Plan

The Annual Action Plan is a yearly update of the Consolidated Plan in which specific projects are identified that will be funded from each of the entitlement programs for a particular fiscal year. Formal approval by the Greensboro City Council is required for a final Annual Action Plan. The Annual Action Plan is due to HUD 45 days prior to the end of the City's fiscal year. Greensboro's Plan must be submitted to HUD by May 15 of each year.

The Consolidated Annual Performance Evaluation Report (CAPER)

The CAPER is a yearly summary that describes how funds were utilized in the previous fiscal year and reports the number and demographic information of beneficiaries served by each activity. Typically, the report is due to HUD by September 30 each year.

Public Hearings

Due to COVID-19 concerns, HUD provides for virtual public hearings for as long as national or local health authorities recommend social distancing and limiting public gatherings for public health reasons.

Functionality of online platforms (i.e. Zoom, Slack, Facebook Live, Google Meet, and Microsoft Teams) will be taken into consideration to ensure that any online hearings comply with fair housing and civil rights requirements. Online platforms will ensure equal access and opportunity for all residents to participate in the process.

One (1) public hearing will be held each year prior to the submission of the Annual Action Plan. The public hearing will be held to receive comments on the draft Consolidated Plan and/or Annual Action Plan and to address housing and community development needs, review the proposed fund uses for the next fiscal year, the development of proposed activities, and review program performance.

One (1) public hearing will be held each year prior to the submission of the CAPER. The public hearing will be held to address housing and community development needs and review program performance.

Additionally, to obtain the views of the community on Assessment of Fair Housing (AFH)-related data and affirmatively furthering fair housing in the jurisdiction's housing and community development programs, at least one (1) public hearing will be held before a proposed AFH is published for comment.

Public Notice

Due to COVID-19 concerns, HUD provides for flexibility of providing reasonable notice of public hearings and public comment procedures.

The City will advertise public hearings as applicable no less than five (5) days and no more than twenty five (25) days prior to the date of a hearing. The City will publish notice of public hearings, draft Consolidated Plan/Annual Action Plans, amendments, and CAPERs in the non-legal sections of the *News & Record*, *Carolina Peacemaker*, and *Qué Pasa* newspapers and on the City of Greensboro's Neighborhood Development Department website at www.greensboro-nc.gov/NeighborhoodDevelopment. In addition, notice will be distributed by request to interested persons, various community organizations and non-profit groups via electronic mailings. The notices will summarize the contents and purpose of the Consolidated Plan and will include a list of the locations where copies of the entire proposed Consolidated Plan may be examined.

Access to Citizen Participation Activities

All public hearings will be held at a convenient time to facilitate broad citizen participation, particularly by low- and moderate-income residents and residents of targeted neighborhoods. By holding virtual public hearings, people with physical and other disabilities will have unrestricted access to the hearing. Functionality of online platforms and various types of available technology will be taken into consideration to ensure that any online hearings comply with fair housing and civil rights requirements. Upon requests made at least five (5) business days prior to a hearing, interpreters will be provided for non- or limited-English speaking individuals and sign language interpreters will be provided for hearing-impaired individuals. Surveys in English and Spanish may also be used to gather resident input during the Consolidated Plan development process.

Residents may contact the Neighborhood Development Department via voice at 336-373-2349, fax at 336-412-6315, or email at Caitlin.Bowers@greensboro-nc.gov.

Public Comment Period

Due to COVID-19 concerns, HUD provides for expedited public comment procedures.

The public will be provided a five-day comment period on citizen participation plan amendments and when Neighborhood Development staff prepares, proposes, modifies, or amends any consolidated plan submissions that contain uses of CDBG-CV, ESG-CV, and/or HOPWA-CV funds or uses of fiscal year 2019 or 2020 CDBG funds to prevent, prepare for, and respond to coronavirus. The public will be provided a 30-day comment period on all other plan submissions and/or amendments.

The Consolidated Plan and Annual Action Plan will be approved by City Council before submission to HUD. Hard copies of the Plans will be made available to the public for free and within two (2) business days of a request. In addition, copies of the Plans will be made available and online at www.greensboro-nc.gov/NeighborhoodDevelopment.

Resident comments received during the citizen participation process will be summarized in writing and included in an attachment to the final Consolidated or Annual Action Plan submitted to HUD. The summary will include staff response to the comments that are received. These questions and responses will be available to the public online at www.greensboro-nc.gov/NeighborhoodDevelopment.

Public Housing Authority Consultation

The City consults with the Greensboro Housing Authority (GHA) to facilitate city understanding of public housing needs and planned GHA activities which will provide the basis for local certification of GHA's annual plans. Such consultation also helps ensure coordination between Con Plan activities and GHA activities in addressing issues of joint concern.

Complaint Procedures

The Neighborhood Development Department is responsible for receiving written and/or verbal complaints or grievances related to the Consolidated Plan and/or Annual Action Plan activities. The Neighborhood Development Department makes every effort to respond in writing to all complaints within fifteen (15) days of receipt.

Any written complaints or grievances may be addressed to:

Caitlin Bowers

Department of Neighborhood Development

PO Box 3136

Greensboro, NC 27402

OR Caitlin.Bowers@greensboro-nc.gov.

Oral complaints or grievances can be made by calling 336-373-2349. Please identify the plan or application being referenced.

Access to Records

The City shall provide for full and timely disclosure of program records and information consistent with applicable state and local laws regarding personal privacy and obligations of confidentiality. Program documents must be retained for a minimum of five years. Upon written request, documents relevant to the program shall be available at the Department of Neighborhood Development during normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday. The City may charge a fee for copies to recover cost of materials and operations.

Technical Assistance

Upon request, Neighborhood Development staff will meet with organizations, advocacy interest groups and residents to obtain their views on housing and non-housing needs. Staff will be available during the funding application period to offer assistance in the process. Staff will advise applicants on technical questions, such as determining the eligibility of a request, federal program requirements, and how to engage in all aspects of the public participation process.

Relocation and Displacement

The City will endeavor to minimize the displacement of persons/households as a result of the activities of the federally funded Consolidated Plan programs. When displacement is unavoidable, displaced persons receive relocation assistance in accordance with the Uniform

Relocation Assistance and Real Property Acquisition Act of 1970 (URA or Uniform Act). City of Greensboro staff will provide information and one-on-one assistance to the prospective displaced persons.

Solicitation of CDBG, ESG, and HOPWA Applications

Annually, the City shall hold a workshop to discuss the application process for the use of CDBG, ESG, and HOPWA funds. The City will provide public notice of the application process and will encourage applicants to contact the Neighborhood Development Department for technical assistance and program requirements. The City will publish notice in the non-legal sections of at least one widely distributed local newspaper and on the City of Greensboro's Neighborhood Development Department website at www.greensboro-nc.gov/NeighborhoodDevelopment. In addition, notice will be distributed to interested persons, various community organizations and non-profit groups via electronic mailings. Using a formal application process, applications are made available via an electronic platform (i.e. Neighborly Software) during defined periods. Notices shall inform citizens of the amount of funds available, deadline for proposal submission, the range of CDBG, ESG, and HOPWA activities that are proposed to be undertaken, and other pertinent program requirements. Applications submitted after the response date and time indicated will not be considered for funding.

The final awards and allocations of funds will be available to the public in each year's Annual Action Plan made available at www.greensboro-nc.gov/NeighborhoodDevelopment.

RFP for HOME-Funded Affordable Multi-Family Housing Development Process

The City of Greensboro typically awards funding for the development of affordable multi-family housing through a Request for Proposals (RFP) process and allocates housing resources according to the priorities adopted in the Consolidated Plan. Applications will be evaluated according to a point ranking system and the findings will be presented to City Council for approval. Final project decisions are typically made by May 1.

The City will publish notice in the non-legal sections of at least one widely distributed local newspaper and on the City of Greensboro's Neighborhood Development Department website at www.greensboro-nc.gov/NeighborhoodDevelopment. In addition, notice will be distributed to interested persons, various community organizations and non-profit groups via electronic mailings. Using a formal application process, applications are made available via an electronic platform (i.e. Neighborly Software) during defined periods. Notices shall inform citizens of the approximate amount of funds available, deadline for proposal submission, the range of HOME activities that are proposed to be undertaken, and other pertinent program requirements. Applications submitted after the response date and time indicated will not be considered for funding.

The CAPER Process

Each year the City must produce a Consolidated Annual Performance Evaluation Report (CAPER) describing and evaluating the community development activities undertaken during the previous program year. The CAPER is due to HUD 90 days from the end of the fiscal year. Typically, the CAPER is due to HUD by September 30.

The City will provide public notice of the draft CAPER as previously described under the Public Notice section. The public will be provided with a 15-day comment period on the draft CAPER.

A public hearing will be held to receive comments on the draft report and to address housing and community development needs and program performance of the previous grant year. The CAPER will be made available for public review at the same locations as described for the Consolidated Plan/Annual Action Plan. Resident comments received (verbal or written) during the citizen participation process will be summarized in writing and included in an attachment to the final CAPER submitted to HUD. The summary will include staff responses to the comments that are received.

Amendments to Consolidated Plan/Annual Action Plan

Due to COVID-19 concerns, HUD provides for expedited public comment procedures.

The public will be provided with at least a five-day comment period to provide comments on the proposed amendments that contain uses of CDBG-CV, ESG-CV, and/or HOPWA-CV funds or uses of fiscal year 2019 or 2020 CDBG funds to prevent, prepare for, and respond to coronavirus prior. The public will be provided a 30-day comment period on all other plan amendments. A detailed written description of the substantial amendment will be made available to the public on the Neighborhood Development website at www.greensboro-nc.gov/NeighborhoodDevelopment.

A substantial amendment is constituted as:

1. A change in the use of CDBG funds from one eligible activity to another
2. Funding of a new project not previously described in the Action Plan
3. A change in the allocation or distribution of funds
 - a. Defined as when the dollar amount of that change is equal to, or greater than 25% of the City's current fiscal year federal allocation
 - b. E.g. CDBG is undergoing a substantial change when 25% or more of that year's CDBG allocation is affected
4. A significant change to an activity's proposed beneficiaries or persons served

Resident comments (verbal and written) received during the citizen participation process will be summarized in writing and included in an attachment to any amendments submitted to HUD. A summary of the comments and the rationale for not accepting any comments will be attached to the substantial amendment of the Plan.

Public Review Sites

Documents that require a public comment period will be available for review at the following locations:

Department Website: www.greensboro-nc.gov/NeighborhoodDevelopment

Melvin Municipal Office Building
Department of Neighborhood Development
300 W. Washington St.
Greensboro, NC 27401