



DRAFT – REVISED VERSION #2

City of Alexandria

Community Development Department

Citizen Participation Plan (CPP)

for

U.S. Department of Housing
and Urban Development Grants

This Citizen Participation Plan was adopted on {ENTER DATE]

by the City Council via resolution # _____

Habla Espanol? Para la versión en Español, llamar el (318) 449-5072 o visitor
www.cityofalexandrialala.com _or_ cda@cityofalex.com.

For alternate forms of this document for persons with disabilities, please contact (318) 449-5072.

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Introduction

Each year, the City of Alexandria receives funding allocations from the U.S. Department of Housing and Urban Development (HUD). These include the Community Development Block Grant (CDBG), the HOME Investment Partnerships Grant (HOME) and in 2020, the CDBG CARES Act (CDBG-CV). As a condition of receiving these allocations, the City must satisfy annual planning and reporting requirements outlined in the federal regulations at 24 CFR Part 91. This Citizen Participation Plan outlines the City’s policies and procedures for obtaining public input in the planning and decision-making processes associated with these HUD grants. These citizen participation policies and procedures shall also be followed for the City’s Analysis of Impediments to Fair Housing Choice (AI) and any application for additional funding through the HUD Section 108 Loan Guarantee Program.

It should be noted that the federal programs covered by this guidance are designed to primarily benefit “low and moderate-income” persons, who are defined as those earning less than 80% of the area median income. Given this, these policies and procedures will focus on gathering input and feedback from this demographic and other populations specifically identified by HUD, including minorities, non-English speaking persons, and persons with disabilities.

In regard to non-English speaking persons, the City has conducted a Four-Factor Analysis to identify Limited English Speaking Persons (LEP). HUD Entitlement Grant recipients are required to take reasonable steps to ensure meaningful access to LEP persons. According to the 2013-2017 American Community Survey 5-Year Estimates prepared by the U.S. Census, less than 2% of households within the City are considered to be Limited English Speaking households. Among Limited English Speaking Households, the languages spoken are divided amongst Spanish (57 households), other Indo-European languages (57 households), Asian and Pacific Island languages (80 households), and other languages (85 households). Based on this analysis, the City will not provide outreach materials in languages other than English, but will provide translation services upon request during public hearings.

Section I: Annual Schedule of Outreach for Planning and Reporting

The schedule of citizen outreach and opportunities for participation is included below. Details about each outreach component, like public hearings and public notice, are included below.

Month	Outreach and Consultation Efforts
January	Citizen Advisory Committee meeting on Annual Action Plan
February	Begin 30 calendar day Public Comment Period for proposed Five Year Consolidated Plan and/or Annual Action Plan Hold Public Hearing on proposed Five Year Consolidated Plan and/or Annual Action Plan
March	15 th : Deadline for submission of Annual Action Plan to HUD
April	30 th : End of City’s Program Year Public Hearing at City Council to adopt Five Year Consolidated Plan and/or Annual Action Plan
May	1 st : Start of City’s Program Year Citizen Advisory Committee meeting on CAPER – previous year’s performance results
June	Begin 15 calendar day Public Comment Period for CAPER Hold Public Hearing on proposed CAPER

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July	Public Hearing at City Council to adopt CAPER 30 th : Deadline for submission of Annual Report to HUD
August	Notice of Funding Availability
September	Execute grant award contracts and return to HUD
October	Public Notice of citizen participation Opportunities
November	Consultations with local partners Community Meetings in Target Neighborhoods for input on upcoming Annual Action Plan
December	Compile survey results from Neighborhood meetings

Section 2: Planning Processes

Every five years, the City is required to draft a Consolidated Plan. The Consolidated Plan includes an assessment of community needs related to community development, homelessness, and affordable housing. The Five Year Consolidated Plan also sets forth a number of strategies that the City will follow to address those needs deemed to be high priorities. Each year, the City is required to create an Annual Action Plan that budgets available resources to projects that will meet the goals set forth in the Five Year Consolidated Plan.

The City is also responsible for preparing an Analysis of Impediments to Fair Housing Choice (AI). The AI is prepared simultaneously with the Consolidated Plan. The AI is a separate document that includes an analysis of fair housing data, issues and contributing factors, and an identification of fair housing priorities and goals to increase fair housing choice. Fair housing choice means that individuals and families have the information, opportunity, and options to live where they choose without unlawful discrimination and other barriers.

These documents will guide the City's actions and use of federal resources for a five year period. It is important for the City to receive quality citizen input on both the Consolidated Plan and the AI. In regard to the Consolidated Plan, citizen input is helpful on the needs assessment and the strategic plan. Outreach itself can help increase the level of fair housing choice within the City. Citizen input can help identify sources of discrimination. It is especially important to receive input from members of the protected classes under the Fair Housing Act, including race, color, religion, sex, familial status, national origin, sexual orientation, gender identity or disability.

All aspects of citizen's participation will be conducted in an open manner, with freedom of access for all interested person and at handicapped accessible locations. The City will take the following actions to encourage citizen input in the planning process:

- Notice of Resources and Expected Activities
The City will publicize the amount of assistance the City expects to receive, including any program income expected to be generated, unspent money to be re-allocated from a previous year, and the type of activities it plans to undertake. The City will also estimate the amount of funds that will benefit persons of low- and moderate-income.
- Targeted Outreach
The City will provide a schedule of the planning process, including key dates such as public hearings, publication of the proposed plan, and comment periods, via email correspondence and City website postings, to the following groups:

- Interested Parties List
- Public Housing
- Alexandria Citizen Advisory Committee
- Continuum of Care

The City will sponsor a Citizen's Advisory Committee to hold meetings on the use and evaluation of CDBG and HOME funds, and any additional funding resources granted from HUD. Additionally, the City may send written requests via email to local non-profits, businesses and government agencies working in the fields of community development, affordable housing, and homelessness to identify ways to improve coordination and if needs have changed since the last needs assessment. The City may elect to schedule additional meetings or hold focus groups based on request. The purpose of these meetings will be to obtain citizens views on the use of CDBG, HOME and any other HUD funding resources. The meetings will be held at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities.

- Targeted Areas

The City may identify geographic areas where the majority of Community Development funds will be targeted. In order to solicit information from residents in these areas, the City will include the geographic areas as part of its Consolidated Plan draft.

- Technical Assistance for Interested Parties

The City will provide technical assistance upon request to groups and organizations that serve low and moderate income persons within the City. To request technical assistance, please call the City Community Development Department at 318-449-5072 or email cda@cityofalex.com. The City will provide a timely written response to all written proposals submitted within thirty (30) calendar days stating the reasons for the action taken by the City.

- Public Comment Period

The City will hold a thirty (30) calendar day public comment period to receive written comments on the contents of the Five Year Consolidated Plan and/or the Annual Action Plan, unless a shorter time period is allowed by HUD. Notice of the comment period will be posted in the local newspaper. The City will post a draft of the proposed Consolidated Plan to its website, which will be available for free download. The document will also include copies or links to the data sets referenced and analyzed when creating the plans. Summaries and full versions of the Five Year Consolidated Plan and/or Annual Action Plan will also be available for review at the Community Development Department, located at 625 Murray Street, 3rd floor. Please allow 3 business days to print the report after the date of the request for a copy. Any comment received during the public comment period will be included in a summarized response incorporated into the plan submitted to HUD.

- Public Hearings

The City will hold two public hearings during the planning process to receive public comment on the Five Year Consolidated Plan and/or the Annual Action Plan. The public hearing may be shared via livestream on the internet to expand participation. Any comments received during the public comment period will be included in a summarized response incorporated into the plan submitted to HUD.

- The first public hearing will be held at the start of the planning process in November with the purpose of soliciting input on community need. An advertisement will be placed in the local

newspaper for the public hearing at least seven (7) calendar days before the hearing date, unless a shorter time period is allowed by HUD.

- The second public hearing will be held during the thirty-day public comment period. Notice for this meeting will be given in the local newspaper advertisement announcing the public comment period itself, but this second public hearing shall not be held earlier than seven (7) calendar following the notice, unless a shorter time period is allowed by HUD.
- Adoption of the Plan
Following the public comment period and finalization of the Plan, it will be presented to and adopted by City Council during a Public Hearing. The public hearing date can be confirmed by contacting the City Clerk 318-449-5090. Attendance is open to the public and the hearing is televised on the local City channel 4 for viewing.
- Publication of Final Adopted Plan
After submission to HUD, the City will post the final adopted Consolidated Plan and AI on the City's website.

Section 3: Amendments

From time to time, the City will need to amend the information contained in the Consolidated Plan and/or Annual Action Plan. Depending on the nature of the change, the amendment will be considered to be a substantial amendment¹ or a minor amendment. Substantial amendments will trigger additional public participation processes outlined below. If an amendment does not meet the definition of a substantial amendment, it shall be considered a minor amendment and will be included in the annual report. Interested parties wishing to comment on minor amendments may do so during the review of the annual report.

A. Reasons for Substantial Amendments to the Consolidated Plan or Annual Action Plan

The City will consider the following changes to constitute a substantial amendment to a Consolidated Plan or Annual Action Plan:

- Changes to priorities in how funds are allocated;
- Use of federal funds to undertake a project not previously described in the action plan;
- Changes in the use of CDBG funds from one eligible project to another if such changes exceed 25% of the total CDBG annual allocation.
- Changes in the use of HOME funds from one eligible project to another if such changes exceed 10% of the total HOME annual allocation.

B. Substantial Amendment Process for the Consolidated Plan and Annual Action Plan

The City will take the following actions to encourage citizen input for substantial amendments to the Consolidated Plan or Annual Action Plan:

- Notice of Substantial Amendment
The City will post a draft of the proposed substantial amendment to its website and follow the public comment requirements in Section 2 above.

¹ In regard to the AI, HUD uses the term "significant material change." For the purposes of this document, the City will use term substantial amendment for "significant material change" to the AI.

- Targeted Outreach
Targeted outreach will follow the process described in Section 2 above.
- Public Comment Period
Public Comment Period will follow the process described in Section 2 above.
- Submission to HUD
Upon completion of the public participation process, the City will send a written notice to HUD of the amendment and update the IDIS reporting system accordingly. Letters transmitting copies of amendments will be signed by the Community Development Administrator and the Mayor.
- Notice to Public Housing Authority
For changes to the Analysis of Impediments to Fair Housing Choice, the City will forward a copy of the amendment to the Alexandria Housing Authority so that the agency may reflect those changes accordingly in their planning efforts.
- Publication of Adopted Substantial Amendment
After submission to HUD, the City will post the final adopted plan on the City's website.

C. Amendment Process for Citizen Participation Plan

The City will review this Citizen Participation Plan annually to ensure it complies with HUD requirements and meets the needs of the community. If an amendment to the Citizen Participation Plan is needed, then the City shall follow this process to provide reasonable notice to the public:

- Public Comment Period
The City will hold a fifteen (15) calendar day public comment period to receive written comments on the contents of the amended or new Citizen Participation Plan, unless a shorter period is allowed by HUD. Notice of the comment period will be posted in the local newspaper. The City will post a draft of the amended Citizen Participation Plan to its website, which will be available for free download. Any comments will be considered before adoption of the plan. Summaries and full versions of the Citizen Participation Plan will also be available for review at the Community Development Department, located at 625 Murray Street, 3rd floor. Please allow 3 business days to print the report after the date of the request for a copy. Any comment received during the public comment period will be included in a summarized response incorporated into the plan submitted to HUD.
 - When amending the Citizen Participation Plan in conjunction with the preparation of the Five Year Consolidated Plan or Annual Action Plan, the City may publish the Citizen Participation Plan along with the Five Year Consolidated Plan or Annual Action Plan for the full thirty (30) calendar day period required for those documents.

Section 4: Performance Reports

The City will prepare an annual report at the end of each Program Year (April 30th) called the Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER report summarizes the use of funds and evaluates the City's performance in regard to meeting its goals during the program year ending (May 1st to April 30th).

- Targeted Outreach
The City will follow the targeted outreach process described in Section 2 above.
- Public Comment Period
The City will hold a fifteen (15) calendar day public comment period to receive written comments on the contents of the CAPER, unless a shorter period is allowed by HUD. Notice of the comment period will be posted in the local newspaper. The City will post a draft of the CAPER to its website, which will be available for free download. Summaries and full versions of the CAPER will also be available for review at the Community Development Department, located at 625 Murray Street, 3rd floor. Please allow 3 business days to print the report after the date of the request for a copy. Any comment received during the public comment period will be included in a summarized response incorporated into the plan submitted to HUD.
- Public Hearing
The City shall hold a public hearing on the draft CAPER and provide notice to the public of the hearing. This public notice shall be posted at the same time the notice for the public comment period is published, but the public hearing shall not be held earlier than seven (7) calendar following the notice. The public hearing may be shared via livestream on the internet to expand participation.
- Submission to HUD
Upon completion of the public participation process, the City will submit the final version of the CAPER report to HUD and update the IDIS reporting system accordingly. The plan must be submitted within ninety (90) calendar days (July 31st) of the end of the program year (April 30th).
- Publication of Final CAPER Report
After submission to HUD, the City will post the final version of the annual CAPER report on the City's website.

Section 5: Methods of Citizen Outreach

A. Public Notice

The main method for providing notice of opportunities to participate in planning and reporting processes will be the local newspaper and City's website. The City's website will provide a consistent source of finding information related to Community Development that can be accessed at any time. The website can be found at:

www.cityofalexandriala.com

Click on Services Tab near the upper right, then click on Community Development on the upper center.

The City will publicize all HUD required public hearings at least seven (7) calendar days ahead of time. The public hearing may be shared via livestream on the internet to expand participation. Reasonable notice will be given for the commencement of any comment period. This will include the following notices:

- Notice of Resources and Expected Activities
- Notice of Funding Availability (NOFA)

- Notice of Public Hearings
- Notice of Citizen Comment Period

B. Citizen Outreach

The City will sponsor a Citizen's Advisory Committee to gather citizen input on the use of CDBG and HOME funds. The Committee will be composed of ten (10) members. The composition of the Committee will be as follows:

- One resident of Target Neighborhood A-B-North Alexandria
- One resident of Target Neighborhood D-South Alexandria.
- One resident of Target Neighborhood E-South Alexandria.
- One resident of Target Neighborhood F-Samtown/Woodside.
- One member of the Business Community or representatives who reside in Target Neighborhood C-Central Business District.
- One representative of elderly and handicapped citizens
- One representative for homeless persons
- One representative for youth
- One representative for persons with AIDS/HIV.
- One representative for person who is mentally/physically disabled

The Mayor shall appoint all members subject to City Council confirmation. All members will serve for a two-year term. Committee members should be active community leaders who are aware of the needs of their neighborhood and who will assist in obtaining citizen input concerning CDBG and HOME activities, and/or any other HUD funding resources, which principally benefit low and moderate income persons. If a member has three (3) consecutive unexcused absences, this member will be replaced.

The Community Development Administrator will serve as the Administrator to the Citizen Advisory Committee to provide support as needed and to provide continuity of citizen participation throughout all stages of the program including the development of needs, the review of proposed activities and review of program performance. The Administrator will not be a voting member of the committee.

Community Development will directly notify, via email or phone call, persons on the Citizen Advisory Committee of upcoming meetings since this is targeted group.

Other Interested Parties may request to attend the Citizen Advisory Committee and/or to be added to the Interested Parties List, please call the City's Community Development Department at (318) 449-5072 or email cda@cityofalex.com.

City also will make reasonable efforts to outreach via the local newspaper, email, City website postings, local churches and through the efforts of the representatives on the Citizen Advisory Committee.

Notice will also be provided to the following groups to directly outreach to minorities, non-English speaking persons, persons living in low and moderate income neighborhoods, and persons with disabilities.

- Neighborhood Meetings in CDBG Target Areas
- Citizen Advisory Committee
- Public Housing Authority
- Members of Continuum of Care

- Recently funded subrecipients

C. Public Hearings

These public hearings contemplated under this plan will be held in Human Resources Conference Room or another accessible City building to ensure accessibility for persons with physical disabilities. The City will attempt to accommodate translation for non-English speaking residents and persons with disabilities if a request is made at least three (3) days in advance. If the City cannot accommodate a request, the City will make alternative opportunities available for non-English speaking persons and persons with disabilities to participate.

D. Publication and Review

The City will post summaries and full versions of each plan and report to its website. Summaries and full versions of the plans and report can be made available for review at the Community Development Department, located at 625 Murray Street, Third Floor. Please allow 3 business days to print the report after the date of the request for a copy.

The website will also include copies or links to the data sets referenced and analyzed when creating the plans. Primary sources include:

- HUD-provided fair housing data;
- HUD-provided low and moderate income data;
- HUD-provided CHAS/ACS data sets; and
- Supplemental information used by the City in its analysis and funding decisions.

E. Public Comments

Written comments received during the formal comment periods described in this draft and those received orally at public hearings will be included in a summarized response incorporated into the documents submitted to HUD.

Comments may be emailed to cda@cityofalex.com or submitted in writing to:

City of Alexandria Community Development
Attention: Administrator
625 Murray Street, Suite 7
Alexandria, LA 71301-8022

F. Access to Records

To assure public access to all records, the City will make the following documents available for review on the City's website at www.cityofalexandrialala.com and at the Community Development Department, located at 625 Murray Street, Third Floor, during normal business hours:

- Current version of the City's proposed or adopted Citizen Participation Plan;
- Current version of the proposed or adopted Five Year Consolidated Plan and Annual Action Plan;
- Current version of the proposed or adopted Section 108 Loan Guarantee Fund applications and related documents, if applicable;
- Current version of the proposed or adopted Analysis of Impediments to Fair Housing Choice; and
- Current version of the proposed or adopted annual CAPER performance report.

Additional records related to the grant programs may be available for public review. However, it is the City's duty to protect the personal information of their beneficiaries. Requests for records other than those listed above will be subject to City approval and may require a Freedom of Information Act (FOIA) request.

G. Technical Assistance

The City will provide technical assistance upon request to groups and organizations that serve low and moderate income persons within the City. To request technical assistance, please call the City Community Development Department at 318-449-5072 or email at cda@cityofalex.com. The City will provide a timely written response to all written proposals submitted within thirty (30) calendar days stating the reasons for the action taken by the City.

Section 6: Response to Disasters and Unforeseen Events

In the event HUD provides opportunity for waiver of the requirements within this plan during a federally-declared disaster or upon any other unforeseen circumstance, the City will follow applicable amended procedures for public notice, public review and comment, and citizen participation to enable the City to redirect resources to the most immediate community needs. The City will comply with all requirements accompanying the allocation of federal funds in these circumstances, including the requirements of statutes, regulations, or HUD administrative guidance with respect to citizen participation and the amendment or adoption of the Consolidated Plan, Annual Action Plan, or CAPER. If needed, the City will request appropriate waivers from HUD to take advantage of any flexibility offered by HUD.

The City may modify its procedures as follows, notwithstanding HUD guidance to the contrary.

- The public review and comment period for amendments may be shortened to five (5) days.
- In-person public hearings for the Consolidated Plan, Annual Action Plan, or any amendment may be held by virtual public hearings only if:
 1. national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and
 2. virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

Section 7: Complaints

Any complaint regarding the City's planning efforts must be in writing and shall be addressed to the Community Development Administrator. The City will evaluate the merit of each complaint and will make every effort to understand the reasons for such complaints and resolve them as soon as possible. The City will respond in writing to all written complaints within fifteen (15) calendar business days of the receipt of the complaint.

Section 8: Relocation and Displacement

Community Development will make every effort to minimize relocation and displacement of persons, families, and businesses in activities funded by HUD funds. In this effort, Community Development will carry out its activities in accordance with the Uniform Relocation Act of 1970, as amended, the applicable federal regulations (49 CFR Part 24), and the requirements of the Section 104(d) of Title I of the Housing and Community Development Act of 1974, as amended.

When the health and safety concern is an issue, Community Development will make efforts to assist the property owner(s) in bringing the housing up to Housing Quality Standards, remove such substandard housing, or recommend temporary or permanent displacement of the person(s) residing in them. In such events, Community Development will provide relocation assistance, to the extent permitted, to the families displaced as a direct result of programs assisted by HUD funds.

Nonetheless, in certain areas identified as urban renewal areas or targeted districts, Community Development may carry out revitalization initiatives aimed at removing urban blight or foster redevelopments. These initiatives on occasions will require relocation. In such cases, prior to any action that will result in displacement, Community Development will notify all affected residents of the intended displacement action, as well as the extent of the benefits that will be available to each impacted person as outlined in 42 U.S.C. 4601 and 5304(d), and 49 CFR 24 and the most recent approved State laws.

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