



CITY OF NORMAN

Citizen Participation Plan
Community Development Block Grant and
HOME Investment Partnerships Program
2020-2024

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BACKGROUND

The United States Department of Housing and Urban Development (HUD) requires the City of Norman to have and follow a Citizen Participation Plan as a condition of receiving funds under the Community Development Block Grant and HOME Investment Partnerships Program. Citizen participation has been a requirement of Federal and State Government for many years as outlined in Section 24 of the Code of Federal Regulations Part 91.105. The Plan must outline the local annual process as well as address key elements mandated by HUD.

The Citizen Participation Plan contains the City of Norman's policies and procedures for involving the community in:

- The development of the Citizen Participation Plan, Annual Action Plan and the Consolidated Plan;
- The review of the Consolidated Annual Performance and Evaluation Report (CAPER); and
- Any substantial amendments to the Consolidated Plan.

Included in the Citizen Participation Plan are policies and procedures for developing, reviewing, and amending these documents.

HUD annually provides funds to the City of Norman. Each year, the City of Norman seeks community participation to identify community needs and determine how the City should distribute funds at the local level.

PURPOSE

The purpose of the Citizen Participation Plan is to provide for and encourage participation from all City residents in the development of the Annual Action Plan, the Consolidated Plan and any substantial amendments to the Consolidated Plan, and in the review of the Consolidated Annual Performance and Evaluation Report (CAPER). The plan will assure that all residents are afforded adequate opportunities to articulate needs, express preferences about proposed activities, assist in the selection of priorities and have questions or complaints answered in a timely and responsive manner.

METHODS OF CITIZEN INVOLVEMENT

The **key elements** for encouragement of all City residents to participate in the development of the Annual Action Plan, the Consolidated Plan, the Consolidated Annual Performance and Evaluation Report (CAPER), and substantial amendments to the Consolidated Plan are listed below:

- encouragement of City residents participation;
- provide City residents access to meetings;
- provide City residents access to information;
- technical assistance for all individuals, agencies and groups that request assistance, including groups representative of persons of low and moderate income;
- take reasonable steps to provide language assistance or other means of communication to ensure meaningful access to participation;
- publicly noticed public hearings;
- publication of the proposed Consolidated Plan;
- set period of time for public comment and review; and
- by providing timely response to written complaints and grievances.

KEY ELEMENTS

The Citizen Participation Plan addresses each of the following **key elements** as mandated by the U.S. Department of Housing and Urban Development.

ENCOURAGEMENT OF CITIZEN PARTICIPATION

The plan will provide for and encourage all City residents to participate in the development of the Consolidated Plan, the Annual Action Plan, any substantial amendments to the Consolidated Plan, and the Consolidated Annual Performance and Evaluation Report (CAPER). The City will take whatever actions are appropriate to encourage the participation of all its residents, especially persons who are of low and moderate income, persons living in slum and blighted areas, persons living in areas where funds are proposed to be used and persons living in predominantly low and moderate income neighborhoods. Special outreach will be made to involve individuals and organizations that represent low income, minority and non-English speaking persons, as well as persons with disabilities in accordance with the City's Public Participation Plan. In cooperation with the local public housing authority, the City will encourage the participation of residents of public and

assisted housing developments. If any specific proposals affect a particular area of the City, the property owners of that area will be notified.

ACCESS TO MEETINGS

The City will afford adequate, timely notification so that residents can attend local meetings and public forums and be involved in decision making at various stages of the program.

ACCESS TO INFORMATION

The City will make information available to residents, public agencies and other interested parties, concerning the amount of funding the City expects to receive (including grant funds and program income), the range of proposed activities that may be undertaken and the amount proposed to benefit low and moderate income residents. Also, these groups will have access to the City's plans to minimize displacement and assist those displaced as a result of proposed activities. City residents and groups will have access to information and records covering the preceding five (5) years.

TECHNICAL ASSISTANCE

The City's CDBG Division staff will provide information and technical assistance throughout the process to all individuals and groups that request assistance, particularly in developing proposals for the Consolidated Plan / Annual Action Plan.

PUBLIC HEARINGS

The City will provide at least two public hearings during each program year cycle with at least one held before the proposed Consolidated Plan and/or Annual Action Plan is published for comment. The initial public hearing will be both an informational session and an opportunity for citizens to comment on the housing and community development needs in the City of Norman. Staff will give an overview of the Community Development Block Grant program, as well as other federal funding sources, including the amount of funding anticipated from each source. The staff will review the eligible activities and beneficiary information. Attendees will be given an opportunity to comment on the community development needs of Norman, the development of proposed activities, and review of past program performance.

The hearings will be conveniently timed and located for persons who may be affected by the proposed funding, accessible to persons with disabilities and adequately publicized. The hearings will provide the opportunity for comments and views in identifying housing and community development needs, developing proposed activities and reviewing program performance. Notification to the public will be published at a minimum ten (10) days in advance of all public

meetings and hearings; however, a 30-day public review period will be included in that notice to receive comments from residents of the community on the plan(s). In addition, a press release will be sent out to the local media, the information will be posted on the City's website and the City's library and city hall.

The second public hearing will occur during the 30 day comment period for the draft Consolidated Plan or Annual Action Plan. This hearing will generally be held at a regularly scheduled City Council meeting. This meeting will take place usually in March or April at City Council. The staff will review the draft Consolidated Plan / Action Plan and attendees will be given an opportunity to comment on the proposed plan. These comments will be incorporated into the final Consolidated Plan / Action Plan to the maximum extent possible.

PUBLICATION OF THE CONSOLIDATED PLAN

The City will publish its proposed Consolidated Plan / Annual Action Plan so that affected residents have sufficient opportunity to review it and provide comments. The requirement for publishing will be met by publishing a summary of the proposed plan in one or more newspapers of general circulation and making copies of the proposed plan available at libraries, government offices, public places and the City's website. The summary will describe the contents and purpose of the Consolidated Plan / Annual Action Plan and include a list of the locations where copies of the entire plan may be examined.

COMMENTS

A period of not less than 30 days will be provided to the public for review and comment on the proposed Consolidated Plan / Annual Action Plan prior to submission to HUD. The City will consider the views of residents, public agencies and other interested parties in preparing its Final Consolidated Plan / Annual Action Plan and attach a summary of such comments to the Final Plan. A period of not less than fifteen (15) days will be provided to the public for review and comment on the CAPER prior to submission to HUD.

COMPLAINTS AND GRIEVANCES

The City will provide timely, written responses to written complaints and grievances within fifteen (15) working days, whenever practical.

CITIZEN PARTICIPATION PLAN CITIZEN PARTICIPATION PROCESS

Prior to the adoption of the Citizen Participation Plan, implementation of the following public comment, review, and adoption procedures will ensure that all residents have a chance to participate in development of the plan. The Public Hearing may be held in conjunction with a meeting of the CDBG Policy Committee.

STEP 1. NOTIFY PUBLIC

The City will provide a notice of 30-day public review period and public hearing on the Citizen Participation Plan in the Norman Transcript. The notice will be printed in the Norman Transcript a minimum of ten (10) days prior to the public hearing date.

STEP 2. ALLOW FOR PUBLIC REVIEW OF CITIZEN PARTICIPATION PLAN

The proposed Citizen Participation Plan will be available for public review at the following locations:

- Norman Public Library, 103 West Acres, Norman
- City of Norman City Hall, 201 W Gray
- City of Norman, Grants Division, 201-A West Gray
- City of Norman Website www.normanok.gov

Upon request, the Citizen Participation Plan will be made accessible to any persons with disabilities. The City will provide a reasonable number of free copies of the Citizen Participation Plan to residents and groups that request copies.

STEP 3. ACCEPT WRITTEN OR ORAL PUBLIC COMMENT

Comments or views of residents received in writing during the public review period or orally at the public hearing will be solicited and considered by the City of Norman CDBG Policy Committee and City Council.

STEP 4. ADOPTION OF CITIZEN PARTICIPATION PLAN

The Draft Plan will be adopted upon a majority vote of the CDBG Policy Committee. After adoption of the Draft Citizen Participation Plan, a Final Plan will be prepared. The Final Plan will include a summary of public comments and a summary of any comments not accepted and the reasons therefore, all of which will be attached to the final Citizen Participation Plan. The adoption

of the Citizen Participation Plan will be adopted by the City of Norman City Council at a designated and publicly noticed City Council meeting.

ANNUAL CITIZEN PARTICIPATION PROCESS

The annual citizen participation process will consist of **nine (9) basic steps** which are outlined below:

STEP 1. NOTIFY CDBG TARGET NEIGHBORHOODS AND REQUEST COMMENTS

Public notices will be posted on the City of Norman’s website and sent to interested Target Neighborhood persons advising them of the annual citizen participation process and requesting comments and proposals. A meeting will be held of the Target Areas whereas neighborhood issues will be discussed. Representatives of the City of Norman will be in attendance including the Norman Police Department. Nominations will be accepted for a minimum of five residents to serve on the CDBG Policy Committee.

STEP 2. CONDUCT PUBLIC HEARING TO IDENTIFY HOUSING AND COMMUNITY DEVELOPMENT NEEDS AND REVIEW PROGRAM PERFORMANCE

The CDBG staff will conduct a public hearing at a time and place convenient to the public and accessible to persons with disabilities. At the public hearing staff will provide information and receive comments and views from the public concerning housing and community development needs, development of proposed activities and past program performance. Public notice of the date and time of the workshop will be posted on the City of Norman’s website and sent to interested persons, organizations, groups and the news media in an effort to encourage participation. Nominations will be accepted for a minimum of ten residents to serve on the CDBG Policy Committee.

STEP 3. POLICY COMMITTEE MEETINGS REGARDING PRIORITIES FOR THE UPCOMING FISCAL YEAR

The CDBG Policy Committee will make recommendations to the City Council as to the priorities for the upcoming funding cycle. These priorities are developed in a series of meetings whereas the issues that were brought forth in the Neighborhood Meeting and/or the Public Hearing can be evaluated as well as ongoing projects that receive CDBG and or HOME funding.

STEP 4. CDBG POLICY COMMITTEE ADOPTS RECOMMENDATION FOR PROPOSED *ACTIVITIES* AND ALLOCATION OF FUNDS

The CDBG Policy Committee will complete its review of all comments and proposals and adopt a recommendation for presentation to the City Council on the proposed Consolidated Plan and Annual Action Plan activities and allocation of funds.

STEP 5. PUBLICATION OF PROPOSED CONSOLIDATED PLAN / ANNUAL ACTION PLAN

A summary describing the contents and purpose of the proposed Consolidated Plan and Annual Action Plan will be published in the Norman Transcript. The publication will include a list of the locations where copies of the entire plan will be available for review and examination (see Step 2 for locations). As per HUD regulations, a reasonable number of free copies of the plan will be made available to individuals and groups that request it.

STEP 6. 30-DAY PUBLIC REVIEW PERIOD OF PROPOSED CONSOLIDATED PLAN / ANNUAL ACTION PLAN

To provide sufficient opportunity for review and comment, a period of no less than 30 days will be provided to residents, public agencies and other interested parties on the proposed Consolidated Plan and Annual Action Plan. The City will consider all comments and views in preparing its Final Consolidated Plan / Annual Action Plan and will attach a summary of such comments to the Final Plan.

STEP 7. CITY COUNCIL ADOPTION OF FINAL CONSOLIDATED PLAN / ANNUAL ACTION PLAN

Upon completion of the 30-day public review period and after consideration of all comments and input, the City Council will adopt the Final Consolidated Plan / Annual Action Plan including the specific activities and allocation of funds. The Final Adopted Plan will be submitted to HUD as required.

During HUD's review period, copies of the Consolidated Plan and Annual Action Plan will be made available at the CDBG Grants Division (201-A West Gray, Norman) and the City's website, www.Normanok.gov. Both documents, along with other information about the City's programs and projects are also available throughout the year on the City's webpage at www.normanok.gov.

HUD requires 30-day public review periods for the Consolidated Plan and the Annual Action Plan, while the review period for the Consolidated Annual Performance Evaluation Report (CAPER) is fifteen (15) days. Questions, concerns, comments and complaints may be directed to the following City department during these review periods, and at any time during the year:

City of Norman Grants Division
201-A West Gray
Norman, OK 73069
Phone: (405) 366-5322

It should be noted that HUD officials will consider public concerns anytime regarding the City's plans and programs described in this Citizen Participation Plan, preferably during the 45-day HUD review period. Written concerns may be submitted to:

U.S. Department of Housing and Urban Development
Office of Community Planning and Development
Earl M. Cook, CPD Director
Oklahoma City Field Office, Region XI
301 NW 6th, Suite 200
Oklahoma City, OK 73102

STEP 8. AMENDMENTS

As defined in Section 24 of the Code of Federal Regulations Part 91.510, the City of Norman will amend its approved plan whenever it makes one of the following decisions:

1. To make a change in its allocation priorities or change the method of distribution of funds;
2. 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
3. To change the purpose, scope, location, or beneficiaries of an activity.

When an amendment take place, the City of Norman will make the amendment public by submitting it to the City Council, posting it on the website, and notifying the public. The document will then be submitted to HUD for approval utilizing the IDIS Portal.

In regards to substantial amendments to the Consolidated Plan or Annual Action Plan, per the regulations, the grantee shall identify the criteria it will use for determining what constitutes a substantial amendment. The City of Norman identifies a substantial amendment as the following:

1. An increase to the funding level of a previously approved activity or program by 50 percent or more;
2. A change in the purpose, scope, location or beneficiaries of an activity to the extent that it would be considered a new activity, at the discretion of the City of Norman; or
3. A change in the types of beneficiaries proposed to be served by the activity (ex. from homeless to youth), when more than 50 percent of the original beneficiary types will be changed.

A substantial amendment will require, at a minimum, that Steps 4 through 7 of the entire citizen participation process be repeated.

STEP 9. 15-DAY PUBLIC REVIEW PERIOD OF CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (**CAPER**)

To provide sufficient opportunity for review and comment, a period of no less than fifteen (15) days will be provided to residents, public agencies, and other interested parties on the Consolidated Annual Performance and Evaluation Report (CAPER). The City will consider all comments will attach a summary of such comments to the final HUD report.

ROLE OF GRANTS DIVISION

The Grants Division will organize and provide staff support throughout all stages of the citizen participation process. The primary function of the division will be:

1. To inform residents of impending plans, reports or review via email, news releases, website postings, mail and other methods.
2. To provide additional information and technical assistance to those who request it.
3. To provide staff support and organize any citizen participation meetings to discuss public concerns and interests.
4. To analyze and compile public input. The staff will respond to the public, and report to the CDBG Policy Committee and the City Council.
5. To act as liaison between the residents and the CDBG Policy Committee and City Council.
6. Whenever possible, to provide written responses to all written proposals submitted, prior to the final adoption of the Consolidated Plan / Annual Action Plan.
7. To make every reasonable effort to provide written responses in answer to complaints within fifteen working days.

8. To provide opportunities for participation by minorities and non-English speaking persons.
9. To provide opportunities for participation by persons with mobility, visual or hearing impairments in all stages of the process.

PROCEDURES FOR RECORD KEEPING

With regard to participation in HUD's Community Planning and Development Programs, particularly the Community Development Block Grant and HOME Investment Partnerships Programs, the City of Norman will maintain the following records and provide access to these records to the public for a minimum of five years:

1. Written records describing the process used to inform the public concerning the amount of funds available for proposed community development and housing activities, the range of activities that may be undertaken, and other important program requirements.
2. Written records of public hearings held to obtain the views of City residents, public agencies and other interested parties on housing and community development needs, proposed uses of funds and program performance.
3. Written records of the opportunities provided the public to participate in the development of the Consolidated Plan and Annual Action Plan.
4. Copies of the Consolidated Plan and Annual Action Plan and related records.
5. Copies of the Consolidated Annual Performance and Evaluation Report (CAPER) and related records.

These records will be retained on file in accordance with federal, state and local requirements in the Offices of the City Clerk and the CDBG Division.

METHODS OF SOLICITING CITIZEN INPUT

- ELECTRONIC MAILINGS

Electronic mailings like e-mails and newsletters will be sent out to interested organizations and individuals. A mailing list will be maintained and updated on a regular basis.

- WEBSITE

Notices, agendas, news releases, annual action plans, the consolidated plan, annual performance reports and application forms will be posted regularly on the City's website at www.normanok.gov

- NEWS RELEASES

News releases will be mailed out to all news media at all stages of the citizen participation process.

- LEGAL ADVERTISEMENTS

Legal advertisements will be published in the legal section of the Norman Transcript when legally required.

DISASTER/EMERGENCY EVENTS THAT MAY REQUIRE EXPEDITED SUBSTANTIAL AMENDMENTS

It may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared disaster or emergency. There are three types of disasters/emergency events that may necessitate an expedited substantial amendment including (1) Man-Made-disasters, (2) Natural disasters, and (3) Terrorism. Man-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc. Natural disasters can include earthquakes, tsunamis, hurricanes, tornadoes, wild fires, flooding and public health issues such as wide-spread disease such as the recent coronavirus disease 2019 (COVID-19). Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc. These expedited substantial amendments may include funding new activities and or reprogramming of funds including cancelling activities to meet needs resulting from a declared disaster or emergency. Therefore, The City of Norman may utilize CDBG, HOME, ESG 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. For CDBG funding under FY 2019-2020, FY 2020-2021 And the Coronavirus Aid Relief and Economic Security ACT or CARES Act, the City of Norman may provide 5-day notices for public comments as allowed under the HUD waiver.

In addition, the following procedures may be utilized:

- Include virtual hearings as an allowed method for citizen participation;
- Update the types of declared disasters or emergency events to include terrorism and infectious diseases, such as the recent coronavirus 19 (COVID-19) pandemic, that may necessitate expedited substantial amendments;
- Provide details on possible actions, including reprogramming of funding and types of possible activities that may be undertaken in response to the COVID-19 pandemic;

- Includes provisions relative to Consolidated Plan citizen participation, Community Development Block Grant, HOME Investment Partnership and Emergency Solutions Grant waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;
- Make minor edits that do not change current citizen participation policies.

Please be advised that if virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.

DEFINITIONS

Annual Action Plan	The City is required to prepare an Annual Action Plan which describes how it will use CDBG and HOME funds during each new fiscal year to address the needs discussed in the Consolidated Plan. The Annual Action Plan must be consistent with the multi-year Consolidated Plan. The Annual Action Plan must be submitted to HUD 45 days prior to the beginning of the program year. For the City of Norman, the beginning of the program year is July 1st.
CDBG Program	Community Development Block Grant Program is administered by HUD and is authorized under Title 1 of the Housing and Community Development Act of 1974, as amended. The purpose of CDBG Program is to enhance and maintain viable urban communities through the provision of decent housing, a suitable living environment, and the expansion of economic opportunities, principally for low and moderate income persons.
CHDO	Community Housing Development Organizations are housing non-profit 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 CHDO's.
CAPER	Consolidated Annual Performance and Evaluation Report describes the accomplishments of the City's CDBG and HOME 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 and HOME 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

HOME Investment Partnerships Program is administered by HUD as authorized by the 1990 National Affordable Housing Act, as amended by the Housing and Community Development Act of 1992. The intent of the HOME Program is to expand the supply of decent, safe, sanitary and affordable housing.

HUD

U.S. Department of Housing and Urban Development (HUD) is the federal agency which administers the CDBG and HOME funds. The City must abide by HUD regulations for these programs as a condition for receiving these funds.