

**CITIZEN PARTICIPATION PLAN
CDBG PROGRAM OFFICE
DALTON, GEORGIA
(Revised 4/20)**

The Consolidated Plan regulations require HUD local government grantees to adopt a Citizen Participation Plan. This Plan reflects the City of Dalton's compliance with the HUD requirements for citizen participation in all appropriate HUD grant programs as of January 2008. This Plan contains the required elements listed in the Consolidated Plan regulations at **24 CFR 91.105(b)**. The City of Dalton CDBG Program Office conducts the planning and administration for the CDBG Program.

1. CITIZEN PARTICIPATION:

The City of Dalton has devised specific actions to encourage increased participation in its housing and community development programs, particularly by persons of low to moderate income. Some of the actions include:

- Review of all citizen comments and incorporation of such comments in the Consolidated Plan, as applicable;
- Analyze the impact of Consolidated Plan program activities on neighborhood residents, particularly low and moderate income residents;
- Conduct Needs Assessments and appropriate on-site visits to each proposed project before including it in the Proposed Consolidated Plan;
- Meet with neighborhood groups to inform them about the Consolidated Plan, project eligibility, the program planning process, project selection and funding, and the project implementation process;

The City of Dalton will continue to provide a forum for open communication with its residents, particularly low to moderate income persons regarding its HUD funded programs. The City of Dalton will strive to increase residents' participation in its housing, community development, and human services programs by providing relevant information so persons/agencies in the City of Dalton might benefit from these grant programs. Techniques will include public housing meetings and/or forums, neighborhood meetings, public hearings, newspaper articles and advertisements, e-mail, and individual personal contacts.

In case of a local and/or national emergency, the City will undertake other feasible steps to encourage citizen participation. These steps could include but are not subject to or limited to:

1. Online live meetings such as City Council meetings and/or department organized meetings, through social media or other online platforms.
2. Availability of an office land line and/or City e-mail account.

3. Availability of a Community Needs Survey via the City of Dalton's website.
4. Availability of receiving oral and/or written comments at the City of Dalton City Hall located at 300 West Waugh Street, Dalton GA 30720

For the FY2019-2020 Fiscal Year, the City of Dalton has been granted the following **Waivers of Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19:**

Waiver# 8: Consolidated Planning Requirements – HOME, CDBG, HTF, ESG, and HOPWA Programs – Citizen Participation Public Comment Period for Consolidated Plan Amendment

Citizen Participation Public Comment Period for Consolidated Plan Amendment

Requirement: 30-day Public Comment Period.

Citations: 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401

Explanation: A CPD grantee may amend an approved consolidated plan in accordance with 24 CFR 91.505. Substantial amendments to the consolidated plan are subject to the citizen participation process in the grantee's citizen participation plan. The citizen participation plan must provide citizens with 30 days to comment on substantial amendments.

Justification: Given the need to expedite actions to respond to COVID-19, HUD waives 24 CFR 91.105(c)(2) and (k), 91.115(c)(2) and (i) as specified below, in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG, HOME, HTF, HOPWA or ESG funds.

Applicability: This 30-day minimum for the required public comment period is waived for substantial amendments, provided that no less than 5 days are provided for public comments on each substantial amendment. The waiver is available through the end of the recipient's 2020 program year. Any recipient wishing to undertake further amendments to prior year plans following the 2020 program year can do so during the development of its FY 2021 Annual Action Plan.

Waiver# 9: Consolidated Planning Requirements – HOME, CDBG, HTF, ESG, and HOPWA Programs – Citizen Participation Reasonable Notice and Opportunity to Comment

Citizen Participation Reasonable Notice and Opportunity to Comment

Requirement: Reasonable Notice and Opportunity to Comment.

Citations: 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401

Explanation: As noted above, the regulations at 24 CFR 91.105 (for local governments) and 91.115 (for States) set forth the citizen participation plan requirements for recipients. For substantial amendments to the consolidated plan, the regulations require the recipient to follow its citizen participation plan to provide citizens with reasonable notice and opportunity to comment. The citizen participation plan must state how reasonable notice and opportunity to comment will be given.

Justification: HUD recognizes the efforts to contain COVID-19 require limiting public gatherings, such as those often used to obtain citizen participation, and that there is a need to respond quickly to the growing spread and effects of COVID-19. Therefore, HUD waives 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401 as specified below to allow these grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances.

Applicability: This authority is in effect through the end of the 2020 program year.

2. ACCESS TO RECORDS, LOCAL MEETINGS AND INFORMATION:

The City of Dalton will continue to provide reasonable notice for all Public Hearings. Information and records relating to The City of Dalton housing, community development, and human services program activities that are made available to the public for review and comment, according to the requirements of Federal, State, and local laws.

Notices of public hearings are publicized throughout the City. Two weeks before the public hearings are held, at least one advertisement is placed in the local newspaper of general circulation (The Daily Citizen). The advertisements are either "display ads" or "legal ads" which appear in the sections of the newspaper most likely to be read by citizens. Additionally, the CDBG Program Office emails all client organizations as a reminder as well.

Copies of public hearing notices, descriptive information concerning HUD-assisted housing, community development and human services programs, Proposed Consolidated Plan [and any amendments] and Annual Performance Reports are placed in accessible locations [the City of Dalton CDBG Program Office located in City Hall and the City's website] in the City of Dalton to permit public review and comment. All documentation is maintained in the CDBG Program Office, documenting the opportunities provided to citizens to ensure that all meetings, records, documents and related information are made readily accessible to the citizens of the City of Dalton.

3. CONSOLIDATED PLAN:

Before The City of Dalton approves an amendment to the current Five-Year Consolidated Plan or Annual Action Plan, it provides information including the amount of financial assistance the City expects to receive from HUD, and the type of activities the City expects to undertake

(including the amount that will benefit persons of very low and low income), the plans to minimize the displacement of persons and the assistance to be provided to any persons displaced, will be made available to residents, public agencies, and other interested parties.

A summary of the proposed Consolidated Plan will be published in the official local newspaper of general circulation [The Daily Citizen] and the Spanish weekly publication (LaVoz), and copies of the Proposed Plan will be available at City Hall, on the City of Dalton website, and/or other public places. The summary will describe the contents and purpose of the Consolidated Plan and will list locations where copies of the Plan can be reviewed. Substantial Amendments to the Plan will be advertised, and copies of each Amendment will also be made available to the general public. As required by HUD regulations, the City of Dalton will provide a period of no less than thirty (30) calendar days from the date of public notice to receive comments from local citizens as it relates to each amendment.

The City of Dalton will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan, and the City's use of HUD housing, community development and human services assistance during the preceding year. Interested parties should contact the CDBG Program Office for such information. Reasonable requests will be satisfied at the time of the request. If more detailed information is desired, which requires compilation of data; such requests will be submitted to the City of Dalton CDBG Program Office in writing.

4. CRITERIA FOR CONSOLIDATED PLAN SUBSTANTIVE AMENDMENTS:

A Substantive Amendment is any deviation from the Strategic or Annual Action Plan that results in a significant change regarding the specific Goals, Objectives, Outputs, and Outcomes as referenced in the current Consolidated Plan.

Any potential Substantive Amendment to an existing Consolidated Plan shall meet the following criteria and will require an opportunity for public comment:

- A. To make a change in the allocation priorities or a change 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 Annual Action Plan;
- C. To change the original intent and purpose of an activity which is no longer applicable;
- D. The costs associated with a change in the scope of an activity must increase or decrease by twenty-five percent (25%);
- E. The location of an activity changes to the extent that it does not serve the target population as originally described in the Consolidated Plan.

5. TECHNICAL ASSISTANCE TO CITIZENS/AGENCIES:

The City of Dalton CDBG Program Office will continue to provide technical assistance to the City

of Dalton residents and agencies, particularly to those of very low and low income who request such assistance in developing project proposals, or who request other information (compliance requirements, program performance, funding information, etc.) outlined in the current Consolidated Plan. Project application forms are available and are distributed at no cost to all persons making a request. A “one-on-one” meeting will be arranged for individuals and groups representing such persons when necessary to explain the project eligibility, application and approval process and other implementation requirements. The City of Dalton CDBG Program Office staff will also meet with various non-profit organizations and individuals to provide other specific technical assistance related to housing, community development and human services programs, as requested. In addition, the City of Dalton CDBG Program Office will provide an annual technical assistance workshop for CDBG applicants to answer questions and provide assistance with the application process.

6. PUBLIC HEARINGS:

The City of Dalton will conduct a minimum of three public hearings annually to obtain citizens comments and concerns and to respond to proposals and questions throughout the program year. The public hearings will be held at different stages of the program year. They will be held at locations accessible to people with disabilities. The Public Hearings will be properly advertised and documented and will include a list of attendees as well as any public comments received. Written minutes of the public hearing are available for review during normal business hours.

1. **Needs Assessment Public Hearing:** This hearing will be conducted annually to determine the nature and types of assistance needed to address Dalton’s priority needs. The Hearing is held at the beginning of the annual planning cycle to solicit input from residents, public housing agencies, and social services organizations on housing, community, and economic development needs. The City of Dalton will use the **Needs Assessment** Public Hearing to report to the citizens on prior year performance for its HUD assisted programs. A Summary of the Consolidated Annual Performance Evaluation Report (CAPER) will be available for review by the attendees.
2. **Proposed Projects Review:** A second Public Hearing is normally held at the close of the application cycle. The purpose of this Hearing is to present to the community all of the projects submitted for funding for the year. CDBG Program Office staff present to the public the results of the needs assessment process, including the proposed priorities for housing and non-housing needs, the proposed long and short term objectives for addressing those needs and the resources available for this purpose. In addition, participants are encouraged to provide input on the degree and extent to which proposed applications meets the City of Dalton’s priority needs.
3. **Proposed Consolidated Plan Review:** Using resident input from the second public hearing, the City of Dalton will develop a strategic Consolidated Plan, or an Annual Action Plan. Activities proposed for funding with HUD housing and community development funds through the City of Dalton will be reviewed and appropriate recommendations will be made to the City Council by the Finance Department [with input from the CDBG Program Office]. These recommendations will be advertised for

public review and comment for 30 days. During this 30 day period, a third public hearing will be conducted to provide ample opportunity for public comment. Once this process is finalized, the City of Dalton's City Council will approve The Plan.

7. NON-DISCRIMINATION POLICY/COMPLAINT REVIEW PROCESS:

It is the policy of the City of Dalton to provide equal opportunity for services without regard to race, color, sex, age, national origin, religion, political affiliation, presence of handicap or disability, or familial status.

Persons who feel that they have been discriminated against or who have a complaint pertaining to the City of Dalton Consolidated Plan, Plan amendments, or Consolidated Annual Performance Evaluation Report, may file a complaint in writing to:

The City of Dalton CDBG Program Office
300 West Waugh Street
Dalton, Georgia 30720
Attn: Ms. Ina Gabe, cdbg@daltonga.gov, (706) 529-2470 or
Ms. Cindy Jackson, (706) 529-2460

The complaint must contain the following information:

- (1) Name and address of the person(s) filing the complaint;
- (2) A description of the act or acts considered to be in violation;
- (3) Other available pertinent information which will assist in the review and resolution of the complaint.

Such complaints should be filed within thirty (30) days of the alleged discriminatory act. A written response as to the disposition of the complaint will be issued by the Director no later than fifteen (15) working days following receipt of the complaint. A person who is dissatisfied with the response to complaint, or if the response is delayed more than fifteen (15) working days, may appeal in writing to:

The City of Dalton Government
300 West Waugh Street
Dalton, Georgia 30720
Attn: Mr. Jason Parker, City Administrator

A written response on the disposition of the complaint will be issued by the City Administrator not later than (30) working days following the receipt of the complaint. If the complainant is dissatisfied with the response of the City Administrator, he/she may submit the complaint, in writing, to:

United States Department of Housing and Urban Development
Georgia State Office of Community Planning and Development

Five Points Plaza
40 Marietta Street, N. W., 15th Floor
Atlanta, GA 30303-9812

No person shall intimidate, threaten, coerce, or discriminate against any person because he/she has made a complaint, testified, assisted, or participated in any matter in an investigation, proceeding, or hearing related to a complaint.

The identity of complainants shall be kept confidential, except to the extent necessary to carry out or conduct investigations, hearings, or judicial proceedings in any matter in an investigation, proceeding, or hearing related to a complaint.

8. CITIZEN COMMENTS:

The City of Dalton will consider any comments or views of residents, agencies, or other interested parties received in writing or orally at Public Hearings, in preparation of the final Consolidated Plan, amendments to the Plan, or the Consolidated Annual Performance Evaluation Report. A summary of these comments will be included in the final **Consolidated Plan, Annual Action Plan, or Annual Performance Report** [CAPER].

9. PROVISIONS FOR NON-ENGLISH SPEAKING AND HEARING IMPAIRED RESIDENTS:

The City of Dalton has a large segment of the population which is “non-English” speaking. The number of non-English speaking residents generally does not present a problem during public hearings or meetings. Arrangements have been made to provide interpreters at public hearings, upon request. Any “non-English” speaking resident who wishes to participate may contact the CDBG Program Office prior to the hearings so that adequate arrangements can be made. Such requests should be made at least five (5) working days prior to the hearing date to permit the CDBG Program Office to make arrangements.

Hearing impaired and other disabled persons who wish to participate in Public Hearings, and who need to have a person "sign" for them at the Public Hearing, should contact the CDBG Program Office via 706-529-2470 at least five (5) working days prior to the Public Hearing date.