



CITY OF ST. CLOUD CDBG

Citizen Participation Plan

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Table of Contents

Introduction	Page 1
Encouragement of Citizen Participation	Page 3
Developing the Consolidated Plan and Annual Action Plan	Page 3
Amendments to Consolidated Plan and Annual Action Plan	Page 4
Annual Performance Reports – CAPER	Page 5
State of Emergency Conditions	Page 5
Technical Assistance to Citizens and Organizations	Page 6
Access to Records	Page 6
Complaint Procedures	Page 6

Introduction

The following Citizen Participation Plan provides a framework and process by which the City's consolidated planning efforts comply with the citizen participation requirements published by the U.S. Department of Housing and Urban Development (HUD). This Citizen Participation Plan is prepared and implemented in accordance with the guidance provided in HUD Regulations at 24 CFR Part 91.105.

The City of St. Cloud is an entitlement community receiving annual grant funding from HUD's Community Development Block Grant (CDBG) program. It is the policy of the City to ensure the meaningful participation of its citizens in the development of the Consolidated Plan, Annual Action Plan, any substantial amendment as well as the annual performance report (CAPER). There is particular emphasis on participation by low-and moderate-income residents and residents living in low-and moderate-income neighborhoods. The facilitation of a citizen participation process accessible to all residents regardless of minority status, disability, or English fluency is essential.

The Citizen Participation Plan is a way for citizens to influence decisions that affect their community, neighborhoods, and way of life. The plan sets forth policies and procedures for citizen participation, which are designed to maximize the opportunity for citizen involvement in the CDBG process. The City also encourages the participation of area organizations including the St. Cloud Housing and Redevelopment Agency (HRA), Central Minnesota Housing Partnership as the Central Minnesota Continuum of Care Coordinator and other organizations (including businesses, developers, and community-based and faith-based organizations) that are involved with or affected by the programs or activities covered by the annual action plans. The Citizen Participation Plan itself is reviewed and adopted by the St. Cloud City Council.

Citizens are encouraged to participate in all phases of the CDBG program and will be provided full access to program information. However, the final responsibility and authority for the Community Development Block Program (CDBG) rest with the St. Cloud City Council.

ENCOURAGEMENT OF CITIZEN PARTICIPATION

It is the policy of the City to encourage and facilitate the full and meaningful participation of residents, service providers, government agencies, the public housing authority and others in the development of all HUD required consolidated planning documents including the Five-Year Consolidated Plan, Annual Action Plans, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Reports (CAPER).

The primary purpose of participation will be in needs identification, priority setting, funding allocations, and program recommendations related to the CDBG program. The City shall provide for and encourage citizen participation with particular emphasis on:

- Low-and moderate-income persons, particularly those living in areas where CDBG funds are proposed to be used;
- Residents of predominantly low-and moderate-income neighborhoods;
- Minorities;
- People with Limited English Proficiency;
- People with Disabilities;
- Residents of public and other assisted housing developments; and
- Local and regional institutions including the St. Cloud HRA, the Central Minnesota Continuum of Care and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations).

The City of St. Cloud is committed to keeping all interested groups and individuals informed of each phase of CDBG planning processes, and of activities being proposed or undertaken with CDBG funds. Opportunities to comment on or participate in planning, community development, and affordable housing activities and projects will be publicized and disseminated throughout the City of St. Cloud using a variety of media including published notices and online messaging.

DEVELOPING THE CONSOLIDATED PLAN AND ACTION PLAN

The City of St. Cloud shall conduct public hearings with proper noticing prior to adoption of the Five-Year Consolidated Plan and/or Annual Action Plan to obtain the views and comments of citizens and other stakeholders regarding the City's housing and community development needs, proposed activities, and the allocation of federal dollars. Every effort will be made to ensure that Public Hearings are inclusive. The meetings will be held at City Hall in the City Council Chambers. The facility is accessible to persons with disabilities. If notice is given at least seven days before a Public Hearing, the City will provide appropriate materials, equipment and interpretation services to facilitate the participation of non-English speaking people and people with visual and/or hearing impairments. Interpreters will be provided at public meetings where a significant number of non-English speaking residents can be reasonably expected to participate.

As part of the drafting of the Five-Year Consolidated Plan, the City shall update its **Analysis of Impediments to Fair Housing** incorporating CDBG's four focus areas of fair housing, homelessness, affordable housing and community development. In this effort, the City shall encourage the participation of area organizations including the St. Cloud HRA, the Central Minnesota Housing Partnership as the regional Continuum of Care Coordinator and other organizations (including

businesses, developers, and community-based and faith-based organizations) that are involved with or affected by the programs and conduct at least one focus group.

Consolidated Plan

As required by HUD regulations at 24 CFR 91.105, the City of St. Cloud will receive comments from citizens on its proposed Consolidated Plan for a period of not less than 30-days prior to adoption by City Council.

At least one Public Hearing will be held to solicit comments on the draft Consolidated Plan. A public hearing notice shall be published in the St. Cloud Times 10-days in advance of the public hearing.

All comments or views of citizens received in writing or orally will be considered in preparing the final plan. A summary of these comments or views shall be attached to the final plan. Oral comments outside of the Public Comment period or Public Hearing will not be considered unless they are provided directly to City staff via email, letter or legible written form at the following addresses:

City of St. Cloud Community Development Department
Attn: Matt Glaesman, Director
400 2nd Street South, St. Cloud, MN 56301 | matt.glaesman@ci.stcloud.mn.us

The final version of the Consolidated Plan as submitted to HUD will be posted on the City's webpage.

Annual Action Plan

As required by HUD regulations at 24 CFR 91.105, the City of St. Cloud will conduct at least two public hearings to solicit comments on the draft Annual Action Plan. Two public hearing notices shall be published in the St. Cloud Times 10-days in advance of each public hearing. A public comment period of not less than 30-days will be published on the City's website at www.ci.stcloud.mn.us/CDBG

All comments or views of citizens received in writing or orally will be considered in preparing the final plan. A summary of these comments or views shall be attached to the final plan. Oral comments outside of the Public Hearing will not be considered unless they are provided directly to City staff via email, letter or legible written form at the following addresses:

City of St. Cloud Community Development Department
Attn: Matt Glaesman, Director
400 2nd Street South, St. Cloud, MN 56301 | matt.glaesman@ci.stcloud.mn.us

The final version of the Annual Action Plan as submitted to HUD will be posted on the City's webpage.

AMENDMENTS TO THE CONSOLIDATED PLAN AND ACTION PLAN

From time to time, it may be necessary for the City to amend the Five-Year Consolidated Plan or an Annual Action Plan to allow for new CDBG projects or activities, modification of existing projects or activities, or other program administrative actions. HUD regulations at 24 CFR Part 91.105 require

amendments to the Consolidated Plan and/or Annual Action Plans whenever there is a change in the allocation priorities or method of distributing funds presented in the plan, a change in the use of funds to an activity not described in the Annual Action Plan, or a change in the purpose, scope, location, or beneficiaries of an activity.

Some amendments will be considered Substantial while others will be considered Administrative. The need to prepare a Substantial Amendment shall trigger use of the public participation requirements described below. **Administrative Amendments** do not require public consultation and may be implemented upon approval from the City of St. Cloud's Community Development Director. Administrative Amendments will be incorporated into the plans and made available online within a reasonable time after they are made.

Any changes in federal funding levels after the comment period or adoption of either the Draft Five-Year Consolidated Plan and/or Annual Action Plan may result in adjustments in allocation amounts and shall not be considered a Substantial Amendment.

Substantial Amendments

HUD regulations at 24 CFR Part 91.105 require the City to identify the criteria to be used in determining if a proposed action will be considered a Substantial Amendment. The following criteria will be used by the City – if any one criterion applies, a Substantial Amendment will be required:

- To carry out an activity, using CDBG funds, not previously described in the Annual Action Plan;
- To change the amount allocated to any specific CDBG activity by more than 50% of the original amount.

Once drafted, the City of St. Cloud shall make the text of the Substantial Amendment available for public comment and submit it to City Council for adoption. Notice and opportunity to comment will be given to citizens through a public notice published in the St. Cloud Times as well as publication on the City's website. According to 24 CFR 91.105, public comment period of 30-days will be provided prior to implementing Substantial Amendments. City staff will prepare a summary of all comments received.

ANNUAL PERFORMANCE REPORTS – CAPER

An annual performance report known as the Consolidated Annual Performance and Evaluation Report (CAPER) must be prepared by the City for annual submission to HUD within 90 days of the conclusion of the City's program year.

Once drafted, the City of St. Cloud shall make the CAPER available for a public comment period of 15-days as required by HUD regulations at 24 CFR 91.105, and submit it to City Council for a public hearing and adoption. Notice and opportunity to comment will be given to citizens through a public notice published in the St. Cloud Times as well as publication on the City's website.

STATE OF EMERGENCY PROCEDURES

In the event of a declared emergency, it may be necessary to reprogram funds to meet urgent community needs. In this situation, requirements related to public notice and the public comment period may be suspended for a limited and defined period of time at the discretion of the Community Development Director. Alternate means of distributing documents for public review, such as websites, email, and social media, and receiving public comment will be utilized when appropriate. The City will comply with all HUD memorandums and notices that direct citizen participation requirements in the event of a local, state, or national emergency or disaster. These requirements shall supersede any conflicting provisions of the Citizen Participation Plan.

TECHNICAL ASSISTANCE TO CITIZENS AND ORGANIZATIONS

The City of St. Cloud will provide technical assistance to citizens and agencies, particularly to those of low-and moderate-income who request such assistance in developing CDBG project proposals, or who request other information (compliance requirements, program performance, funding information, etc.) outlined in the current Consolidated Plan. A meeting with an appropriate City staff representative will be arranged for individuals and groups when necessary to explain the project eligibility, application and approval process, and other implementation requirements. City of St. Cloud staff may 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.

ACCESS TO RECORDS

A reasonable number of free copies of the City of St. Cloud's Consolidated Plan, Annual Action Plan, the Consolidated Annual Performance and Evaluation Report (CAPER), as well as all amendments to the Consolidated Plan and Annual Action Plan will be available to citizens and groups requesting them. These documents shall be maintained for not less than 5 years on the City's website. Materials will also be made available in a form accessible to persons with disabilities and limited English proficiency upon request.

COMPLAINT PROCEDURE

HUD regulations at 24 CFR Part 91.105 require the City of St. Cloud to accept written comments, complaints, concerns or questions regarding CDBG and provide a written response within fifteen (15) working days, when practicable. Correspondence may be addressed to:

City of St. Cloud Mayor's Office
400 2nd Street South, St. Cloud, MN 56301

The complaint must contain the following information:

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

The federal government has given the City of St. Cloud sole responsibility and authority to develop and implement the Five-Year Consolidated Plan within HUD regulated guidelines. Persons wishing to contact the regional HUD office may address correspondence to:

United States Department of Housing and Urban Development
Regional Office of Community Planning and Development
212 3rd Avenue South #150, Minneapolis, MN 55401