

**LOUISVILLE METRO GOVERNMENT
OFFICE OF HOUSING AND COMMUNITY DEVELOPMENT
CITIZEN PARTICIPATION PLAN**

To promote citizen participation, emphasizing the involvement of low-to-moderate, very low, and extremely low income residents, Louisville Metro has adopted the following Citizen Participation Plan. The Citizen Participation Plan is designed to give residents the opportunity to engage in the development of goals, strategies, and priorities for the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs.

CITIZEN PARTICIPATION ACTIVITIES

Louisville Metro shall utilize a multifaceted approach to obtain citizens' views. These approaches include, but are not limited to:

1. **Public Hearings** – A minimum of two public hearings shall be held during the development of the Consolidated Plan or Action Plan. Louisville Metro will utilize various notification methods to inform citizens of the public hearing, as outlined on Page 2. To stimulate the involvement of low, very low, and extremely low income residents, Louisville Metro will send notice of the public hearing to the Louisville Metro Housing Authority (LMHA), at least ten (10) to fourteen (14) days prior to the hearing. It is intended that LMHA will disseminate the information to its residents. Public hearings will be held during the week after 6:00 o'clock P.M. in an architecturally barrier free facility which is convenient to potential and actual beneficiaries. Notice will be made at least ten (10) to fourteen (14) days prior to the event. Included in the notification will be contact information for residents with mobility, visual, or hearing impairments and Limited English Proficient persons, so appropriate accommodations may be made. Recorded copies of the public hearing will be made available for those unable to attend and provisions will be made to accept their written comments.

2. **Stakeholder Meetings** – Louisville Metro shall engage various service providers and elected officials to aid in the development of the Consolidated Plan or Action Plan. Louisville Metro shall utilize standing meetings of key stakeholders (such as Continuum of Care meetings, board meeting or taskforces) as an opportunity to obtain feedback from these service providers. Particular emphasis will be placed on engaging stakeholder groups which represent low, very low, and extremely low income residents and/or represent predominately low and moderate income neighborhoods and/or represent minority groups (including non-English speaking and persons with disabilities) and/or represent homeless populations. Louisville Metro will announce stakeholder meetings on its website and send notice to community organizations, commissions, coalitions, and boards as well as to the Louisville Metro Housing Authority. Notice will be made at least ten (10) to fourteen (14) days prior to the event. Included in the notification will be contact information for residents with mobility, visual, or hearing impairments and Limited English Proficient persons, so appropriate accommodations may be made.

3. **Public Comment** – Citizens will have the opportunity to provide written comments regarding the proposed Consolidated Plan or Action Plan along with any amendments to the Plan. Citizens will have the opportunity to submit comments through the Louisville Metro website, Louisville Metro social media platforms, and/or via mail.
4. **Surveys** – Louisville Metro may choose to utilize a survey to obtain feedback from citizens in regards to community needs and funding priorities. Surveys can be administered during public hearings, stakeholder meetings, and/or online accessible from the Louisville Metro website.

NOTIFICATION TECHNIQUES

Louisville Metro may choose to utilize all or some of the notification techniques outlined below to provide citizens with the ability to participate in the citizen engagement process.

1. **Legal Advertisement** – Louisville Metro may publish notices as a legal advertisement in the Courier-Journal ten (10) to fourteen (14) days prior to the citizen participation activity (which complies with Chapter 424 of the Kentucky Revised Statutes). Contact information will be included in the notice for persons with disabilities or persons who are Limited English Proficient, so appropriate accommodations may be made. Any public hearings held during any phase of the Plan process, outlined on pages 3 to 5, **MUST** utilize legal advertisements as a means to notify the public.
2. **Email Notification** – Louisville Metro will make its best effort to inform past participants / attendees of the Consolidated Plan / Action Plan process aware of upcoming citizen participation activities. Louisville Metro will utilize meeting sign in sheets to obtain emails of participants. Louisville Metro can also utilize Metro email publications, such as newsletters and Mayor’s weekly report, to inform the public of citizen participation activities.
3. **Metro TV**- Louisville Metro can utilize Metro TV in order to inform citizens of citizen participation activities. Louisville Metro can utilize televised standing meetings, such as city council meetings, as an avenue to notify the public. Louisville Metro may choose to televise citizen participation activities as part of the Consolidated Plan / Action Plan process. This is a great method to reach citizens who are unable or unwilling to attend a meeting in person.
4. **Website** – Louisville Metro will post the Consolidated Plan, Action Plan, Amendments, the Annual Performance Report and this Citizen Participation Plan to the Louisville Metro website. Accommodations will be made to provide these materials to persons with disabilities or persons who are Limited English Proficient who are unable to access them via the Internet or in person at the locations outlined on page 3 – 4. Louisville Metro will also utilize the website to announce upcoming citizen participation activities.
5. **Social Media** – Louisville Metro can announce citizen participation activities via Louisville Metro social media platforms, such as Facebook and Twitter.

CONSOLIDATED/ACTION PLAN PROCESS

- 1. Community Needs Assessment** – The first phase is the community needs assessment, which includes consulting with key stakeholders, service providers, and citizens to review community needs, issues, and strengths prior to preparing the Consolidated Plan or Action Plan. At least one public hearing will be incorporated into the community needs assessment phase to collect the views of citizens, service agencies, and other interested parties on community needs and priorities for addressing those needs. This will also be an opportunity for citizens to review prior program performance and comment publicly. Surveys may also be utilized during the community needs assessment phase to obtain information.
- 2. Publishing the Proposed Plan** – Louisville Metro will take the comments received during the community needs assessment phase into consideration when developing the proposed Consolidated Plan or Action Plan. The Plan will indicate the amount of assistance Louisville Metro anticipates receiving, the range of activities that will be undertaken, including the amount to benefit persons of very low and low income status, and it will outline plans to minimize the displacement of persons, including how it will assist those persons who are displaced. After the proposed Consolidated Plan or Action Plan has been completed, Louisville Metro will prepare a summary of the Plan describing its contents and purpose. This summary will be published as a legal advertisement and will list the locations the proposed Plan may be reviewed in its entirety. In addition, the summary will provide information as to how citizens may submit written comments on the proposed Plan. For citizens to have access to the proposed Consolidated Plan or Action Plan, electronic or paper copies will be available at the main public library and all of its branch offices. Copies will also be available at the offices of Louisville Metro Office of Housing and Community Development (LMHCD), Louisville Metro Department of Community Services, and all Neighborhood Places. Additionally, the proposed Plan will be posted to the Louisville Metro website. Citizens may request a hard copy of the Plan from LMHCD. Free copies of the Plan will be available on a limited basis as citizens have the opportunity to review the Plan through the methods described. Citizens will be informed in the proposed Consolidated Plan or Action Plan of how to submit comments. The date, time, and location of the public hearing on the proposed Plan, as part of the public comment period as described below, will be included in the legal notice published in the Courier-Journal.
- 3. Public Comment on the Proposed Plan** – Once the summary of the proposed Plan has been published and the entire document is available to the public, citizens and interested entities will have a period of not less than thirty (30) days to offer written comments. At least one public hearing will be incorporated into the public comment phase to collect the views of citizens, service agencies, and other interested parties on the proposed Plan. After the period for comment is over, comments received in writing or orally at a public hearing shall be considered in preparing the final Plan. A summary of these comments as well as Louisville Metro's response to such comments and a summary of any comments not accepted along with the reasons shall be attached to the final Plan. Any complaints relating to the Plan, amendments, or performance reports, either written or verbal, will be substantially responded to within fifteen (15) business days from the receipt of the complaint.

4. **Adoption and Submission of Plan** – Once the final Consolidated Plan or Action Plan has been completed, including the summary of the comments, it will be forwarded to the U.S. Department of Housing and Urban Development. Louisville Metro will utilize at least one of the notification techniques outlined on page 2 announcing the locations where the public may review the final document. Copies will also be available in the offices of the Louisville Metro Office of Housing and Community Development, Louisville Metro Department of Community Services, and all Neighborhood Places. Additionally, the final Consolidated Plan or Action Plan will be posted on the Louisville Metro website linked to the Louisville Metro Office of Housing and Community Development homepage.

5. **Amendments to the Plan** - Should a substantial change occur in the planned or actual activities, Louisville Metro will formally amend the Consolidated Plan or Action Plan. Louisville Metro will utilize at least one of the citizen engagement activities outlined on pages 1-2 to provide the opportunity for the public to given comments on the amendment. Louisville Metro will utilize at least one of the notification techniques outlined on page 2 to inform the public of the amendment, where the amended Plan may be reviewed, and how to provide comments in regards to the amendment. The proposed amendment will also be posted on the Louisville Metro website. Citizens will have a period of not less than thirty (30) days after the proposed amendment is made available to the public to submit written comments. Louisville Metro will review and take into consideration all comments, views, or complaints before submitting the amended, final Consolidated Plan or Action Plan to the U.S. Department of Housing and Urban Development. Comments, views, or complaints must be submitted in writing, or orally at public hearings. A summary of the comments, views, and complaints will be attached to the amendment submitted to the U.S. Department of Housing and Urban Development along with an explanation of the reasons they were accepted or rejected, if applicable

The criteria Louisville Metro will use to determine what necessitates a substantial amendment are as follows:

- a. A significant change of project scope resulting in a funding adjustment totaling 30% or more in a program year Action Plan budget for the project;
- b. A series of changes representing a cumulative total of 20% or more in a program year Action Plan budget;
- c. The addition of a new activity not previously included in the Consolidated Plan;
- d. The deletion of an activity previously listed in the Consolidated Plan;
- e. Changing the location of an activity in such a way that it substantially affects the original scope of the project; or
- f. Altering the scope of an activity in such a way that it affects the original, intended beneficiaries.

Carry-forward funds and funds remaining after a project is completed may be reallocated to another previously approved project without requiring a substantial amendment.

CDBG, ESG, and HOPWA sub-recipients and HOME funded projects will go through a competitive funding process(es). Any groups representing persons of low and moderate incomes

may request technical assistance from Louisville Metro to help in their preparation of an application for funding. The method with which to request technical assistance shall be included as part of the request for funding applications. The funding decision making process will also be outlined in the request for funding applications. Once sub-recipients and projects have been approved, Louisville Metro Government will review the list to determine if a technical correction of the information is needed or a substantial amendment is required.

- 6. Annual Performance Report** - Within ninety (90) days of the close of the program year, Louisville Metro will submit a program report in the format prescribed by the U.S. Department of Housing and Urban Development. Prior to the submission to HUD, Louisville Metro will utilize at least one of the citizen engagement activities outlined on pages 1-2 to provide the opportunity for the public to give comments on the annual performance report. Louisville Metro will utilize at least one of the notification techniques outlined on page 2 to inform the public of the report, where the report may be reviewed, and how to provide comments in regards to the report. Citizens will have a period of not less than fifteen (15) days after the report is made available to the public to submit written comments. Louisville Metro will review and take into consideration any written comments, views, or complaints before submitting the report to the U.S. Department of Housing and Urban Development. A summary of the comments, views, and complaints will be attached to the report submitted to HUD.

- 7. Citizen Participation Plan** - Citizens will have the opportunity to comment on this Citizen Participation Plan and any amendments made to this Plan in conjunction with the public comment periods associated with the Consolidated Plan or Action Plan. The Citizen Participation Plan will be available to the public via the Louisville Metro website. Accommodations will be made to provide the Citizen Participation Plan to persons with disabilities or persons who are Limited English Proficient who are unable to access them via the Internet.

MISCELLANEOUS PROVISIONS

Displacement

It is the policy of the Louisville Metro Government to minimize the displacement of persons resulting from programs and projects funded under the Consolidated Plan (CDBG, HOME, ESG, and HOPWA). If displacement occurs because of activities carried out in the Plan, Louisville Metro Government will follow its Residential Anti-displacement and Relocation Assistance Plan (RARAP) which follows the regulations set forth in the Uniform Relocation and Real Property Assistance Act of 1970 and HUD implementing regulations at 24CFR Part 42 and Section 104(d) of the Housing and Community Development Act of 1974 (as amended).

Access to Records

Louisville Metro Government will provide citizens, public agencies, and other interested parties reasonable and timely access to information and records relating to Louisville Metro Government's Consolidated Plan

and Consolidated Plan programs for the prior five (5) year period. Louisville Metro Government reserves the right to charge a fee for copies to recoup the cost of providing the documents.

Emergency Funding

In response to a locally declared disaster, a situation may arise that requires immediate action to relieve emergency conditions in the community. These situations may result from storms or weather, natural disaster, terrorism, violence, or infectious disease. In the event of a disaster or local emergency, the Mayor, as the Chief Executive Officer for the entitlement jurisdiction, has the option to allocate CDBG funds to assist with the recovery effort.

To meet the citizen participation statutory requirements governing these funds, yet be able to act in an expedient manner, the review and comment period for funding received as a result of an emergency situation will be shortened to fifteen (15) days. In the event that such a local disaster or emergency prevents required public meetings from being held in person, virtual public meetings shall be acceptable. Such meetings should follow the same required notification techniques described on pages 2. Effort should be made to provide accommodations for residents with hearing impairments, such as closed captioning.

In all emergency situations, waivers from the U.S. Department of Housing and Urban Development (HUD) may take precedence and may be used to their full capacity to expedite and alleviate requirements for public participation in cases where such processes may delay the release of emergency funds. Record of such waivers should be kept on file and the public should be made aware of their use.

If funds are needed on an emergency basis and adherence to separate comment periods would prevent the giving of assistance during a Presidentially declared disaster, or during a local emergency that has been declared by the Mayor who has proclaimed there is an immediate need for public Action, the combined Notice of Finding of No Significant Impact (FONSI) and Notice of Intent to Request Release of Funds (NOI/RROF) may be disseminated and/or published simultaneously with the submission of the RROF. The combined Notice of FONSI and NOI/RROF shall state that funds are needed on an emergency basis due to a declared disaster and that comment periods have been combined. The Notice shall also invite citizens to submit their comments to both HUD and Louisville Metro Government.

Section 108 Loan Guarantee Program

Applications for assistance filed by Louisville Metro Government or its predecessors, the City of Louisville and Jefferson County, KY, for Section 108 loan guarantee assistance as authorized under HUD regulation 24 CFR Part 570, Subpart M, are subject to the provisions set forth within the Citizen Participation Plan. The citizen participation process for such applications mirrors that for developing or amending a Consolidated Plan or Action Plan and may be included as part of Consolidated Planning process or may be undertaken separately anytime during the program year.

