Citizen Participation Plan

Town of East Hartford
Community Development Block Grant
Program



Effective January 5, 2021

CITIZEN PARTICIPATION PLAN COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

Citizen Participation Structure

The East Hartford Grants Administration Office is the municipal office responsible for administration of the CDBG program including preparation of the annual Action Plan and the Consolidated Plan. These responsibilities include the distribution of information to the public and facilitating the participation of the public in the formulation of CDBG program activities as well as housing goals and policies included in the Consolidated Plan. The citizen participation process will meet the requirements of federal regulations 24 CFR, parts 91.105 and 91.505, and will include consultation with a variety of organizations, agencies, and community/neighborhood based groups that provide services to or that represent low and moderate income persons, minority and non-English speaking residents and the special needs population.

The East Hartford Grants Administration Office, in conjunction with the East Hartford Housing Authority, will encourage those residents of public and assisted housing developments to actively participate in the development and implementation of the Consolidated Plan.

The East Hartford Grants Administration Office will also make every effort to provide information to the East Hartford Housing Authority regarding proposed Consolidated Plan activities and will encourage its participation in the development and implementation of this plan.

Public Hearing Process

In developing the annual Action Plan there will be at least two public hearings per year at two different stages of the program year. The purpose of these hearings will be to solicit citizen input on housing and community development needs, development of proposed activities, and review of program performance. One of these public hearings will be held prior to the referral of the proposed Action Plan to the Town Council. A second will be held during the public review period for the Consolidated Annual Performance and Evaluation Report (CAPER). One public hearing shall be during regular business hours to allow for public transportation needs and the other shall be held in the evening so that persons employed during daytime hours will be free to attend. Both public hearings will be held at the Town Hall located at 740 Main Street in East Hartford. All public hearings will be held in rooms that are accessible to the handicapped.

In the event of an emergency closure of Town-owned buildings and/or a federal, state or local emergency declaration, a virtual public hearing will be held. The virtual public hearing will allow attendees to submit their questions in real time (set up like a conference call). In order to provide the greatest flexibility for submitting comments, the public will be allowed to submit comments in writing or by telephone until noon of the day following the virtual public hearing.

In order to obtain the views of citizens and community organizations on housing and community development needs, including non-housing community development needs, at least one of these hearings shall be held before a proposed Consolidated Plan is published.

Adequate advance notice will be given to all citizens regarding each public hearing with public notices published in a newspaper having general local circulation at least fifteen (15) calendar days prior to the date of the meeting. The Grants Administration Office will also utilize one or more of the following means to publicize a hearing or a deadline: publication of notices and information in non-legal sections of newspapers; on the Town of East Hartford's web site, www.easthartfordct.gov; through public service announcements over public television; or, by direct mailings to public service organizations that have requested it. It is also the intention of the East Hartford Grants Administration Office to contact not-for-profit and community groups which represent low and moderate income people prior to all public hearings in order to encourage citizen participation particularly among low and moderate income residents, minority and non-English speaking residents and the special needs population.

Although there has been a considerable increase in the number of town residents of Hispanic ethnicity since the 1990's, it is not known if these residents are non-English speaking. The Grants Administration Office will include a statement in Spanish in public hearing notices informing residents to contact the Grants Administration Office three business days prior to a public hearing if an interpreter is needed. The Grants office will make every effort to accommodate this request as well as those from other non-English speaking residents.

Citizen Comments

Summaries of proposed Consolidated Plans and Action Plans will be published in a newspaper having a general local circulation. Copies of proposed Consolidated Plans and Action Plans will be made available for public review in the East Hartford Grants Administration Office (740 Main Street, East Hartford), Town Clerk's Office (740 Main Street, East Hartford) and at the Raymond Library (840 Main Street, East Hartford). In addition, CDBG documents, including the proposed and final versions of the Consolidated Plan, Annual Action Plan and Consolidated Annual Performance and Evaluation Report will be placed on the Town's web site, www.easthartfordct.gov, so affected citizens have sufficient opportunity to review it and provide comments.

In the event of an emergency closure of Town-owned buildings and/or a federal, state or local emergency declaration, items that must be made available for public review will be posted on the Town's website. Additionally, in order to provide the greatest flexibility for submitting comments during a closure, the public will be allowed to submit comments in writing or by telephone until noon of the day following the virtual public hearing.

The East Hartford Grants Administration Office will provide a period of not less than thirty (30) calendar days, to receive citizen comments and views on proposed Consolidated Plans. All comments and views received in writing, by telephone, or in person will be taken into consideration in preparation of the final Consolidated Plan. A summary of all comments and views and why they were accepted or rejected shall be attached to the final Consolidated Plan.

Substantial amendments to the final Consolidated Plan during the program year shall be published in a newspaper having a general local circulation. At least thirty (30) calendar days shall pass during which time affected citizens may comment on these amendments. A "substantial amendment" is defined as the following:

- 1. the addition or elimination of a priority stated in the Consolidated Plan;
- 2. the addition of an activity, not previously approved, to an existing annual Action Plan.

Modifications to a Consolidated Plan that are not considered substantial include:

- 1. any change to the scope, location or beneficiaries of an activity;
- 2. funding changes to existing activities in an already approved annual Action Plan.

Upon completion of a Consolidated Annual Performance and Evaluation Report (CAPER), notice of its availability for public review will be published in a newspaper having a general local circulation. Copies of the report will be available for public review in the East Hartford Grants Administration Office (740 Main Street, East Hartford), Town Clerk's Office (740 Main Street, East Hartford) and at the Raymond Library (840 Main Street, East Hartford).

The East Hartford Grants Administration Office will provide a period of not less than fifteen (15) calendar days, to receive citizen comments and views on any CAPER. All comments and views received in writing, by telephone or in person will be taken into consideration and a summary of all comments and views will be attached to the CAPER.

Documentation

Upon completion of major documents, notice will be published in a newspaper having a general local circulation advising the public of the submission and availability of such documents. These documents include the Consolidated Plan and the CAPER. Members of the public wishing to view these documents should contact the Grants Administration Office to request an appointment.

Records, documents and information relating to the program during the preceding five (5) years are also available at the Grants Administration Office. These documents are available to any member of the public who requests a copy in accordance with Freedom of Information Act requirements.

Technical Assistance

The Grants Administration staff is available to provide information or technical assistance to local groups with interest in funding. In the event that a community group, non-profit organization or housing sponsor desires more extensive information, counseling or technical assistance, the Grants Administration Office can be available on an as-needed basis. This is done with the understanding that, in order to adequately meet the needs of all clients and organizations, extended amounts of staff time may not be available.

Response to Questions and Complaints

Citizens notifying the Grants Administration Office of complaints and grievances shall receive a written reply by this Office within fifteen (15) business days whenever practicable.

Relocation Plan

In accordance with Public Law 91-646, as amended ("Uniform Relocation Assistance and Real Property Acquisition"), and the Town of East Hartford's commitment to provide decent, safe, sanitary and affordable housing to low and moderate income households, the East Hartford Grants

Administration Office has established procedures for displacement, relocation assistance and other assistance to tenants who reside or will reside in dwellings to be rehabilitated.

The Town of East Hartford will make every effort to prevent displacement and relocation. In the event displacement does occur however, the Grants Administration Office will adhere to the process established in the "Town of East Hartford's Community Development Block Grant Program Displacement Plan". This document is available for public review in the East Hartford Grants Administration Office (740 Main Street, East Hartford).

Exceptions to Citizen Participation Plan Requirements/HUD Waivers

In response to the COVID-19 public health outbreak of early 2020, the Coronavirus Aid, Relief and Economic Security ("CARES") Act provided flexibility for CDBG grantees to use CARES Act funding, and authorized HUD to grant waivers and alternative requirements for its Community Planning and Development programs. The Town has updated its Citizen Participation Plan to include the following policies and procedures related to the flexibilities and waivers authorized by the CARES Act:

- 1. The Town has updated its Citizen Participation Plan to establish expedited procedures to draft, propose or amend consolidated plans.
- 2. Citizens will be provided notice of availability to comment on the substantial amendments to the Town's Consolidated Plan, Annual Action Plan, and updated Citizen Participation Plan, with a minimum opportunity to comment of five (5) days. The five-day comment period for any/all documents and plans may run concurrently.
- 3. In-person public hearings will not be required and may be substituted with virtual hearings if the following conditions are met:
 - a. National/local health authorities recommend social/physical distancing and limiting public gatherings for health reasons; and
 - b. Virtual hearings provide reasonable notification and access for citizens, timely responses from local officials to questions and comments and public access to all questions and responses.
- 4. The Town will include in its public notice(s) that it intends to amend its Citizen Participation Plan, the amount of CARES Act/CDBG-CV funding that it expects to receive and that it intends to use said funds specifically to "prevent, prepare for and/or respond to" the COVID-19 outbreak.

All of the requirements in the Citizen Participation Plan are subject to change in the event of guidance or waivers issued by HUD. In the event that HUD issues guidance or waivers that affect citizen participation in the planning process, the Town of East Hartford will provide as much notice as is possible while still complying with the guidance or waivers received from HUD.