

## CITIZEN PARTICIPATION PLAN

The Citizen Participation Plan (CPP) described in detail below is the CPP established for the State of Arkansas's five year Consolidated Plan, which covers the 2020 through 2024 Program Years.

Each Program Year affords Arkansas residents an opportunity to be involved in the process. Citizens have a role in the development of the Consolidated Plan, the Annual Action Plan, and the Annual Performance Report regardless of age, gender, race, ethnicity, disability, and economic level.

### **Purpose**

The State of Arkansas developed a Citizen Participation Plan in order to establish the citizen participation efforts that would be carried out through the five year Consolidated Plan. The State understands the importance of public participation (including consultation with advisory groups) in the consolidated planning process. The CPP seeks to provide and encourage the participation of Arkansas citizens in the development of the Consolidated Plan; Substantial Amendments to the Consolidated Plan; each Annual Action Plan, and the Annual Performance Report. Emphasis is placed on encouraging participation and involvement by low and moderate income persons; residents of low and moderate income areas; residents of slums and blighted areas; individuals and organizations located where federal and state resources may be used; minorities and non-English speaking residents (including those with Limited English Proficiency); and persons with disabilities.

The CPP describes the process the State uses to collect public input and involve the public in the development of the Consolidated Plan; each year's Annual Action Plan; each year's Annual Performance Report; and for any Substantial Amendment to the overall Consolidated Plan. This Citizen Participation Plan was developed in accordance with Section 91.110 and 91.115 of the U.S. Department of Housing and Urban Development (HUD) Consolidated Plan regulations.

The purpose of the CPP is to provide citizens of the state of Arkansas maximum involvement in identifying and prioritizing housing and community development needs in the state, and responding to how the State intends to address such needs through allocation of the following federal grants: Community Development Block Grant (CDBG) and CDBG-CV; HOME Investment Partnerships (HOME); National Housing Trust Fund (HTF); Emergency Solutions Grant (ESG) and ESG-CV<sup>1</sup>; and, Housing Opportunities for Persons with AIDS (HOPWA) and HOPWA-CV.

In order to receive these federal grant resources, HUD requires jurisdictions to submit a Consolidated Plan every three to five years. This Consolidated Plan covers a five-year timeframe from July 1, 2020 through June 30, 2024. The State's Consolidated Plan is a comprehensive strategic plan for housing and community development activities. The purpose of the programs and activities covered by this Consolidated Plan is to improve the state of Arkansas by providing decent housing, a suitable living environment, and growing economic opportunities, especially for low to moderate income residents.

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<sup>1</sup> Per the CARES Act, E ESG grantees may omit the citizen participation and consultation requirements for substantial amendments and new plan submissions for ESG-CV funding. Omitting citizen participation means that for ESG-CV funds, jurisdictions do not need to accept any comments or hold hearings. However, each grantee must publish how it will use its allocation; per the CARES Act, this is to be "on the Internet at the appropriate Government website or through other electronic media."

Below are details on the citizen participation efforts and requirements for the Consolidated Plan, the Annual Action Plan, the Annual Performance Report, and any Substantial Amendment to the overall Consolidated Plan.

## **I. 2020-2024 Consolidated Plan**

The State of Arkansas’s Consolidated Plan is developed through a collaborative process between the Arkansas Economic Development Commission (AEDC), the Arkansas Development Finance Authority (ADFA), the Arkansas Department of Human Services (DHS), and the Department of Health (ADH). Citizen participation is another important part of the Consolidated Plan including developing and amending the Plan as well as providing input and comments on program performance.

### **Participation**

The following provides detailed steps for citizen participation for the 2020-2024 Consolidated Plan.

**Community Needs Assessment Survey**—A Survey will be developed in order to assess the public’s view on community needs throughout the state. This survey will be distributed to a wide range of stakeholders that include: public officials; housing advocates; developers; Development Districts; and other interested members of the public. The Community Needs Assessment (CNA) will be provided in both English and Spanish and available on the AEDC website.

**Focus Groups**—Several focus groups will be held throughout the state during the Spring of 2020 with a broad range of groups.

**Stakeholder Interviews**—A series of interviews will be conducted with key persons or groups who are knowledgeable about housing and community development needs in the state.

**Public Hearings**—During the 30-day public comment period at least one public hearing will be conducted in central Arkansas.

**Public Comments**—Written comments are accepted during the 30-day public comment period.

### **Proposed Consolidated Plan Public Comment**

A reasonable notice is given to announce to the public the availability of the Proposed Consolidated Plan. The Proposed Plan is made available to the public in several ways including: available on the AEDC website; available at the public hearings for the Proposed Consolidated Plan; and available to any individual who requests a hard copy of the Proposed Plan.

Notification of the availability of the Proposed Consolidated Plan will be completed through the following actions:

- AEDC will publish a Public Notice that contains a summary of the Consolidated Plan in at least one newspaper of statewide distribution. The Public Notice will describe the contents and purpose of the Consolidated Plan and will also include a list of the locations where copies of the entire Proposed Plan may be examined.
- AEDC will post the Public Notice, and provide a copy of the Proposed Plan on the Commission’s website.

- A news release announcing the availability of the Proposed Consolidated Plan will be sent to local news sources throughout the state.
- The news release, and information about the Public Notice, will be circulated to local governments; housing, economic, and community development organizations; and other interested individuals and groups.
- Social Media (examples may include Twitter and Facebook) will be utilized to provide the public additional notice on the availability of the Proposed Plan.

Copies of the Proposed Consolidated Plan will be made available through the following methods:

- The State of Arkansas, Economic Development Commission’s website at: <http://www.arkansasedc.com/grants>
- Providing copies during the public hearings held
- Providing copies to any individuals that request a copy by contacting AEDC.

A 30-day public comment period will be provided in order to receive comments on the Proposed Consolidated Plan. The dates of the 30-day public comment period will be identified within the public notices and information that is distributed through news releases and email distributions.

### **Public Hearings**

At an identified time, public hearings will be conducted through an in-person meeting in central Arkansas. During the sessions, Proposed Consolidated Plans will be distributed, brief highlights of the Plan will be presented, and instructions on how to submit public comments will be provided. In addition, participants will be given an opportunity to ask questions and to provide official public comments on the Proposed Consolidated Plan.

### **Final action on the Consolidated Plan**

All written comments provided during the Consolidated Plan process will be considered in preparing the Final Consolidated Plan. A summary of the comments received and a response to those comments will be included in the Final Consolidated Plan. After the State answers any comments, and prepares the Final Consolidated Plan, the Plan will be submitted to HUD, no later than May 15th, 2020, or upon approved extension.

## **II. Annual Action Plans**

Each year the State must submit an Annual Action Plan (AAP) to HUD, reporting on how that year’s funding allocation for CDBG, HOME, ESG, and HOPWA funding will be used to achieve the goals outlined in the 2020-2024 Consolidated Plan. The Citizen Participation Plan for the preparation of the Annual Action Plan is as follows:

Notification of the availability of the Proposed Annual Action Plan will be completed through the following actions:

- AEDC will publish a Public Notice that contains a summary of the AAP in the statewide newspaper. The Public Notice will describe the contents and purpose of the AAP and will also include a list of the locations where copies of the entire AAP may be examined.

- AEDC will post the Public Notice, and provide a copy of the Proposed AAP on the AEDC website.
- A news release announcing the availability of the Proposed AAP will be sent to local news sources throughout the state.
- The news release, and information about the Public Notice, will be circulated to local governments; housing, economic, and community development organizations; and other interested individuals and groups.
- Social Media (examples may include Twitter and Facebook) will be utilized to provide the public additional notice on the availability of the AAP.

Copies of the Proposed AAP will be made available through the following methods:

- The State of Arkansas, Economic Development Commission’s website at: <http://www.arkansasedc.com>
- Providing copies during the public hearings held.
- Providing copies to any individuals that request a copy by contacting AEDC.

A 30-day public comment period will be provided in order to receive comments on the Proposed AAP. The dates of the 30-day public comment period will be identified within the public notices and information that is distributed through news releases and email distributions.

At an identified time, public hearings will be conducted through in-person meetings in multiple locations in Arkansas. During the sessions, Proposed Annual Action Plans will be distributed, brief highlights of the Plan will be presented, and instructions on how to submit public comments will be provided. In addition, participants will be given an opportunity to ask questions and to provide official public comments on the Proposed Annual Action Plan.

#### **Final action on the Annual Action Plan**

All written comments provided during the Annual Action Plan process will be considered in preparing the Final Annual Action Plan. A summary of the comments received and a response to those comments will be included in the Final AAP. After the State considers any comments, and prepares the Final AAP, the AAP will be submitted to HUD, no later than May 15th, 2015, or upon approved extension.

### **III. Annual Performance Reports**

Each year the State must submit an Annual Performance Report (APR) to HUD, reporting on actions completed during the previous Program Year for CDBG, HOME, ESG, and HOPWA as they relate to the performance measures outlined in the 2020-2024 Consolidated Plan. The Citizen Participation Plan for the preparation of the Annual Performance Report is as follows:

Notification of the availability of the Proposed Annual Performance Report will be completed through the following actions:

- AEDC will publish a Public Notice that contains a summary of the APR in the statewide newspaper. The Public Notice will describe the contents and purpose of the APR and will also include a list of the locations where copies of the entire APR may be examined.
- AEDC will post the Public Notice, and provide a copy of the Proposed APR on the Department’s website.
- A news release announcing the availability of the Proposed APR will be sent to local news sources throughout the state.
- The news release, and information about the Public Notice, will be circulated to local governments; housing, economic, and community development organizations; and other interested individuals and groups. Social Media (examples may include Twitter and Facebook) will be utilized to provide the public additional notice on the availability of the APR.

Copies of the Proposed APR will be made available through the following methods:

- The State of Arkansas, Economic Development Commission’s website at: <http://www.arkansasedc.com/grants>
- Providing copies to any individuals that request a copy by contacting AEDC.

A 15-day public comment period will be provided in order to receive comments on the Proposed APR. The dates of the 15-day public comment period will be identified within the public notices and information that is distributed through news releases and email distributions.

**Final action on the Annual Performance Report**

All written comments provided during the Annual Performance Report process will be considered in preparing the Final Annual Performance Report (APR). A summary of the comments received and a response to those comments will be included in the Final APR. After the State considers any comments, and prepares the Final APR, the APR will be submitted to HUD, no later than September 30 of each year.

**IV. Substantial Amendments**

AEDC reserves the right to make non-substantive changes to the Consolidated Plan, the Annual Action Plan, and Annual Performance Report without opening a public comment period. In some instances, program changes and public comments warrant an amendment to the Consolidated Plan or Annual Action Plan. A change to the Consolidated Plan or Annual Action Plan which constitutes a Substantial Amendment, must meet one or more of the following criteria:

- A substantial change in the described method of distribution of funds to local governments, non-profit organizations, or other eligible entities in order to carry out activities. A “substantial change” shall mean the movement between programs of more than 25 percent of the total allocation for a given Program Year’s CDBG or ESG allocation, or a major modification to any Program. Elements of a “method of distribution” include:
  - the application process for local governments, non-profits, or other eligible entities;

- the allocation among funding categories;
- grant size limits; and
- criteria selection.
- An addition or deletion of a Priority;
- An addition of an Objective that was not consistent with an existing priority; or
- The deletion of an Objective that was previously included.

If the State proposes to change its adopted method of distribution relating to the CARES Act coronavirus response funds (CDBG-CV; ESG-CV; HOPWA-CV) by adding or eliminating eligible activity, or to change the funding allocation for an individual activity within the method of distribution approved in the applicable Annual Action Plan in an amount greater than 50%.

Notification of the availability of the Proposed Substantial Amendment will be completed through the following actions:

- AEDC will publish a Public Notice that contains a summary of the Substantial Amendment in the statewide newspaper. The Public Notice will describe the contents and purpose of the Substantial Amendment and will also include a list of the locations where copies of the entire Substantial Amendment may be examined.
- AEDC will post the Public Notice, and provide a copy of the Proposed Substantial Amendment on the Commission’s website.
- A news release announcing the availability of the Proposed Substantial Amendment will be sent to local news sources throughout the state.
- The news release, and information about the Public Notice, will be circulated to local governments; housing, economic, and community development organizations; and other interested individuals and groups.
- Social Media (examples may include Twitter and Facebook) will be utilized to provide the public additional notice on the availability of the Substantial Amendment. Copies of the Proposed Substantial Amendment will be made available through the following methods:
- The State of Arkansas, Economic Development Commission’s website at: <http://www.arkansasedc.com/grants>
- Providing copies to any individuals that request a copy by contacting AEDC.

A 30-day public comment period will be provided in order to receive comments on the Proposed Substantial Amendment. The dates of the 30-day public comment period will be identified within the public notices and information that is distributed through news releases and email distributions.

#### **Final action on the Substantial Amendment**

All written comments provided during the Substantial Amendment process will be considered in preparing the Final Substantial Amendment. A summary of the comments received and a response to those comments will be included in the Final Substantial Amendment. After the State considers any comments, and prepares the Final Substantial Amendment, the Substantial Amendment will be submitted to HUD.

## **Changes in Federal Funding Level**

Any changes in federal funding levels after the Consolidated Plan or Annual Action Plan's proposed comment period has expired, and the resulting effect impacts the distribution of funds, will not be considered an amendment or a substantial amendment.

## **V. Disasters**

If a federal and/or state disaster declaration is made, the State will evaluate the CPD resources available to address the disaster. If the State determines that resources are available to address the disaster, the State will follow the process for amendments as identified in Section IV. In an effort to expedite actions to address the disaster, the State will request or notify HUD of the waivers, if not already granted by HUD, from the HUD Little Rock Field Office for the following requirements within 24 CFR 91.115(c)(2) and (i):

1. Citizen Participation Plan Comment Period for Substantial Amendment – Reduce the public comment period from thirty days to no less than five days or as otherwise approved by HUD.
2. Citizen Participation Reasonable Notice and Opportunity to Comment – allows the State to determine what constitutes reasonable notice and opportunity to comment given.

## **VI. Requirements for Local Governments**

Upon application for CDBG funding, local governments are required to submit a certification of a local citizen participation plan. Local citizen participation plans ensure that the units of local government are meeting the requirements of Title 24 of the Code of Federal Regulations Part 570.486. The local participation plans should include the following provisions at a minimum:

- Local governments shall conduct a minimum of two (2) public hearings to be conducted with regard to any CDBG application. One hearing shall be conducted at the initiation of any such application and a second public hearing shall be held near the completion of any such funded activities to obtain citizen input, comments or opinions with regard to such application(s) and with regard to program or project performance.
- Notices of public hearings to be conducted by the local government shall be published and posted within a reasonable period prior to such hearings. Notices for public hearings must identify each proposed project; project location, including target area boundaries, if any; proposed project activity; total project cost; and grant amount requested.
- Public hearings must be held at times and places convenient for affected citizens, potential or actual beneficiaries, and including persons with disabilities. Public hearings must contain bilingual communications for non-English speaking residents when they will be affected by a proposal and reasonable advanced notification is given to the local government.

## **VII. Availability to the Public**

The Consolidated Plan, each Annual Action Plan, each Annual Performance Report, and any Substantial Amendments will be available to the public. These materials will be modified for individuals with disabilities and those with Limited English Proficiency upon request as needed. Copies of these

documents may be obtained upon request from the Arkansas Department of Economic Development. Current program year documents will be available on the AEDC website at:

<http://www.arkansasedc.com/grants>

**VIII. Access to Records**

AEDC will provide citizens, public agencies and other interested parties with reasonable and timely access to information and records relating to the State’s Consolidated Plan and AEDC’s use of assistance under the mandated programs (CDBG, HOME, ESG, and HOPWA). Records will be available for the preceding five (5) years.

**IX. Complaints**

AEDC will respond in writing to written citizen complaints about the Consolidated Plan, Annual Action Plan, Annual Performance Report, and Substantial Amendments. Citizen complaints should be submitted to the Arkansas Economic Development Commission. Complaints may also be received verbally, and by other means, as necessary where the AEDC determines that a citizen is not reasonably able to submit a written complaint due to a physical or intellectual impairment. In these instances, AEDC may convert these complaints into written form.

AEDC will respond to complaints within fifteen (15) working days, where practicable.

Compliance Officer  
Grants Management Division  
Arkansas Economic Development Commission  
900 W. Capitol, Ste. 400  
Little Rock, AR 72201  
Or by email to: [dpolk@arkansasedc.com](mailto:dpolk@arkansasedc.com) with a copy to [jnoble@arkansasedc.com](mailto:jnoble@arkansasedc.com)

If you need assistance in filing a written complaint, you may contact Dori Polk at 501-682-7335.

Any person that feels that the Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 regulations were not complied with may file a complaint directly to the Assistant Secretary for Fair Housing and Equal Opportunity at the following links (or as otherwise directed):

FORT WORTH REGIONAL OFFICE U.S. Department of Housing and Urban Development Southwest Office 801 Cherry St., Unit 45, Suite 2500 Fort Worth, TX 76102	Garry Sweeney, Regional Director	(817) 978-5868  Fax: (817) 978-5876
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Or Contact (888)560-8913 and for the hearing impaired, please call TTY (800)927-9275