

Clay County, Florida

Citizen Participation Plan

Community Development Block Grant



Last Amended on September 26, 2021

Introduction & Background

Purpose

The Citizen Participation Plan (CPP) provides guidance for citizens and organizations in Clay County (County) to voice their opinions and participate in all phases of development of the Consolidated Plan including the Five-Year Consolidated Plan, the Annual Action Plan, the Citizen Participation Plan, the Analysis of Impediments to Fair Housing, the Residential Anti-Displacement Plan, the Consolidated Annual Performance and Evaluation Report and any amendments to these plans. The Consolidated Plan, along with its supporting plans, provides a guiding framework for Clay County's management of programs and funds related to the Community Development Block Grant (CDBG) program administered by the US Department of Housing and Urban Development (HUD). The CPP establishes the procedures for citizen participation in development and updating of the Consolidated Plan and its supporting plans. These procedures are designed to maximize transparency and opportunities for public engagement. The CPP emphasizes public outreach to low- and moderate-income residents through non-profits, faith-based organizations, and philanthropic organizations to bolster the voices of under-represented demographics. Residents living in blighted neighborhoods and areas that qualify for CDBG funds are strongly encouraged to participate. The CPP is developed in accordance with U.S. Department of Housing and Urban Development's rule 24 CFR 91.105.

The CPP encourages citizens to participate in all stages of the planning process including the identification of needs, establishing community priorities, funding allocation, and the implementation and eventual evaluation of program activities.

Accordingly, the County makes provision for citizens to participate in the development of the Citizen Participation Plan, the Consolidated Plan, each related Annual Action Plan, and any substantial amendments to these plans. The County also makes provision for citizens to comment on the Consolidated Annual Performance Evaluation Report (CAPER) that evaluates activities and projects implemented each year.

Process

The CPP shall be developed in coordination with the County, public, and consultants. After the CPP is drafted, the public shall have an opportunity to comment and give input on the final version of the plan. The final CPP shall be made public and formatted as ADA complainant.

CLAY COUNTY CONSOLIDATED PLAN

Development of the Consolidated Plan

Before adopting the initial Consolidated Plan, the County will give citizens, public agencies, and other interested parties information on the amount of assistance the County expects to receive from the CDBG program, the range of activities that can be funded through the grant, and how these projects will benefit low- and moderate-income residents. The County will conduct two public meetings. The meetings will involve the following:

- Public Meeting #1
 - Public Meeting #1 will focus on engaging stakeholders in the County. A survey will be utilized to provide additional feedback.
- Public Meeting #2
 - Public Meeting #2 shall be a Community Participation Workshop where the public shall be invited to provide their opinions and ideas for the CDBG funds. This meeting shall be advertised on public forums and social media accounts as well as have a website dedicated to the project that shall be available to the public. An online survey will be conducted before, during, and after the workshop to garner additional input from the public who could not attend the meeting.
 - HUD data and other information planned to be used in the development of the Consolidated Plan will be presented at this meeting.
- The public will be given prior notice of the public meetings and how to participate in them. See *Public Notice* Section of *Development of the Consolidated Plan* for more details.
- Engagement with local municipalities and neighboring counties will happen in addition to the two public meetings.

The purpose of meetings will allow stakeholders and the public to:

- become informed on the CDBG and the amount of funding expected;
- provide input on Housing and Community Needs;
- discuss activities that may be implemented with the funds;
- understand resources to possibly displaced persons; and
- be presented the project timeline.

Public Participation in Development of the Consolidated Plan

The public participation procedures for the Development of the Five-Year Consolidated Plan shall carry forth as the same process of the Annual Action Plan, Citizen Participation Plan, Analysis of Impediments to Fair Housing, Residential Anti-Displacement Plan, the Consolidated Annual Performance and Evaluation Report as well as any Substantial Amendments to these plans.

Public Notice of Plan for Comment:

The County will notify the public of the Consolidated Plan and how to get involved in several ways including:

- Publishing notice in a local newspaper
- Posting on the County's websites, including:
 - County website; and
 - County social media accounts.
- Information regarding the Consolidated Plan and ways to participate will be posted in all five (5) public libraries.
- The County will network with community partners, faith-based leaders, and business associations to reach low- and moderate-income populations in a more effective manner.

The contents of the County's notification shall include the following:

- Summary of the Plan
- Funding anticipated
- Proposed activities
- Locations where full copies can be reviewed
- Notice Period and how to comment

The public shall have a comment period following the Public Notice to comment on the Plan and make suggestions. Public copies of the Proposed Consolidated Plan shall be in the following places for public consumption and comment:

- Clay County Public Libraries
- Clay County Department of [Planning & Zoning](#) [Community and Social Services](#)
- Clay County Website

Clay County Public Meeting Procedures

Non-English-Speaking Persons:

- Special arrangements for a translator will be made by the County. A citizen requiring a translator should send a request at least two (2) business days before the event.

Special Accommodations for Persons with Disabilities:

- Special arrangements for a sign language interpreter will be made by the County. A request should be sent to the County at least two (2) business days prior to the event. Recorded events will be posted with closed captioning for those hard of hearing.

Access to records:

- A recording of the public meetings will be made public for those who were not able to attend. This recording will be posted on the project's website with links from the County website and social media accounts.
- Minutes of the public meetings shall be recorded and placed on the project website.
- Citizen input shall be summarized and documented in the minutes. This summary will be attached to the final Consolidated Plan. Citizens can send their comments and concerns to the [Director of Planning and Zoning Clay County Department of Community and Social Services](#).

Emergency provisions:

In the event of a disaster or declaration of emergency, public notice will be altered to follow HUD issued waivers or notices. In addition, the in-person meeting format described below may be altered to a virtual format depending on the nature and severity of the circumstances. Every effort will be made to notify the public of any such changes.

Annual Public Meetings – Consolidated Plan

These public meetings are intended to meet the guidelines required by the U.S. Department of Housing and Urban Development established in 24 CFR 91.105(e)1. Clay County will hold at least two (2) public meetings annually to obtain citizen input and to respond to questions regarding program activities.

Timing: One early in the process and one prior to the end of the public review period.

Purpose:

The purpose of the public meetings is to;

- Receive comments from citizens, public agencies, and community members;
- Respond to proposals and comments at all planning stages;
- Identify housing and community development needs/deficits;
- Propose and evaluate proposals for the funds; and
- Review program performance (if applicable).

Public Notice and Comment Period

Public Notice: The County will publish a notice in a local newspaper as well as the County website no less than 15 days in advance of the public meeting. The notice will include the meeting's date, time, a summary of the Plan(s), the amount of funding anticipated, a list of proposed activities utilizing the funds, the locations where full copies of the Plan(s) can be reviewed, the Notice Period, and information on how to comment.

Time and Location: The public meetings will be held at a centralized, accessible location. The meetings will be held at a time that is convenient for the potential beneficiaries so that they are able to provide their input in an easier manner. A virtual meeting attendance option may be offered as circumstances permit. If a virtual attendance option is offered, access information for this option will be included in the Public Notice for the meeting.

Public Comments: The County will consider any input from citizens and stakeholders, either in writing or verbally. All input shall be summarized, and any views not accepted will be documented with their corresponding reasoning for rejection.

- During the public comment period, the [Planning and Zoning Director Clay County Department of Community and Social Services](#) will answer questions from the general public.
- The Consolidated Plan will be presented to the Clay County Board of County Commissioners for approval.
- Following County Commission approval, the Consolidated Plan will be submitted to HUD.

Substantial Amendments to the Consolidated Plan

Substantial amendment(s) to the Consolidated Plan must conform to 24 CFR 91.505. Clay County will consider the following changes to be substantial amendments to the Consolidated Plan, and the Annual Action Plan, and subject to the citizen participation process, in accordance with its Citizen Participation Plan and 24 CFR 91.505.

Substantial amendment(s) must be submitted and reviewed by HUD prior to completion of the Consolidated Annual Performance and Evaluation Report (CAPER). The amendment(s) should first be incorporated into the Consolidated Plan and, subsequently, into the Annual Action Plan. Substantial Amendments may be submitted six (6) times a year.

A substantial change is defined as one of the following occurrences:

- A change that adds a new priority.
- A change that adds a new activity.
- A change that cancels an activity that involves more than 25% of the fiscal year's funding allocation. This does not include activities which must be dropped due to circumstances beyond the control of Clay County, e.g. a subgrantee elects not to do an activity; the activity fails because a property owner refuses to sell; etc. In this instance, funds may be reprogrammed to an alternate activity without amending the Action Plan. However, reallocation of funds to a new activity not previously described in the Action Plan will be a substantial amendment.
- A change of use of funds from one activity to another. Movement of funds from cancelled activities (which are less than 25% of the fiscal year's funding allocation) to eligible alternate activities, or funding alternate activities with excess program income are not considered amendments.
- A change in the project location to one beyond the original census tract and block group.
- A change in the scope of an activity as it relates to beneficiaries, basic eligibility, or changes in purpose/stated objectives of an activity. Receipt of additional CDBG funds of less than five percent of the CDBG grant does not constitute a substantial amendment and will be used for housing rehabilitation. An activity will be considered substantially changed when one of the following criteria apply:
 - The activity will no longer principally benefit the targeted population as identified in the Action Plan (e.g., senior citizens in certain areas, low- and moderate-income homeowners, homeless persons, etc.).
 - The activity will no longer address the low- and moderate-income need identified in the Action Plan (e.g., shelter for homeless, center for senior citizens, housing for low- and moderate-income households) or the

activity ceases to address the elimination of slums and blight as identified in the Action Plan.

- The activity location of an area-benefiting activity changes so that the completed activity will principally serve beneficiaries other than those originally intended.
- The scope of the activity has increased to the point where its completion with project funds would result in the inability to carry out another approved activity or would necessitate reducing the scope of another activity to a point where it would not accomplish its intended purpose.
- A declaration by the mayor, governor and or president of the United States of a natural disaster or pandemic. Uncommitted funds may be allocated to eligible activities needed to assist in disaster relief without triggering a substantial amendment with approval from the Board of County Commissioners.

Public Notice and Comment Period

Public Notice: The County will publish a notice in a local newspaper as well as the County website at the beginning of the 30-day comment period. The notice will include the meeting's date, time, a summary of the proposed amendment(s), the amount of funding affected, a list of proposed activities utilizing the funds, the locations where full copies of the Plan(s) can be reviewed, the Notice Period, and information on how to comment.

Time and Location: The public meeting will be held at a centralized, accessible location. The meeting will be held at a time that is convenient for the potential beneficiaries so that they are able to provide their input in an easier manner. A virtual meeting attendance option may be offered as circumstances permit. If a virtual attendance option is offered, access information for this option will be included in the Public Notice for the meeting.

Public Comments: The County will consider any input from citizens or stakeholders, either in writing or verbally. All input shall be summarized, and any views not accepted will be documented with their corresponding reasoning for rejection.

- During the public comment period, the [Planning and Zoning Director Clay County Department of Community and Social Services](#) will answer questions from the general public.
- Substantial amendments to the Consolidated Plan will be presented to the Clay County Board of County Commissioners for approval.
- Following County Commission approval, amendments to the Consolidated Plan will be submitted to HUD.

Minor Amendments to the Consolidated Plan

Clay County will consider the following changes to be minor amendments to the Consolidated Plan, and the Annual Action Plan, and subject to the citizen participation process, in accordance with its Citizen Participation Plan and 24 CFR 91.505.

Minor amendment(s) must be submitted through IDIS and reviewed by HUD prior to completion of the Consolidated Annual Performance and Evaluation Report (CAPER). Minor amendments should first be incorporated into the Consolidated Plan and, subsequently, into the Annual Action Plan.

A minor amendment is defined as:

- A change that cancels an activity that involves less than 25% of the fiscal year's funding allocation.

Consolidated Annual Performance & Evaluation Report (CAPER)

A Consolidated Annual Performance & Evaluation Report (CAPER) will be submitted once a year to HUD, no later than 90 days after the close of the County's program year. The report will detail the progress the County has made on fulfilling the goals and objectives in the Consolidated Plan with CDBG funds. The report will include a description of the resources made available, utilization of available resources, geographic distribution and locations of funded projects/services, households/persons assisted, demographic information of persons assisted, actions taken to further fair housing practices in the County, and the progress of any other goals of the 5-year strategic plan. The County will conduct a public meeting to obtain public feedback and address questions.

Public Notice and Comment Period

Public Notice: The County will publish a notice in a local newspaper as well as the county website at the beginning of the 15-day comment period. The notice will include the meeting's date, time, a summary of the CAPER, the locations where full copies of the CAPER can be reviewed, the Notice Period, and information on how to comment.

Time and Location: The public meeting will be held at a centralized, accessible location. The meetings will be held at a time that is convenient for the potential beneficiaries so that they are able to provide their input in an easier manner. A virtual meeting attendance option may be offered as circumstances permit. If a virtual attendance option is offered, access information for this option will be included in the Public Notice for the meeting.

Public Comments:

The County will consider any input from citizens, either in writing or verbally. Citizen input shall be summarized, and any views not accepted will be documented with their corresponding reasoning for rejection in the *Performance Report*.

- During the public comment period, the [Planning and Zoning Director](#) [Department of Community and Social Services](#) will answer questions from the general public.
- The CAPER will be presented to the Clay County Board of County Commissioners for approval.
- Following County Commission approval, the CAPER will be submitted to HUD.

Public Access to Meetings and Records

Public Meetings

Clay County commits to provide its citizens with reasonable and timely access to public meetings regarding the Consolidated Plan and related Annual Action Plans and any amendments thereto, and to the Consolidated Annual Performance and Evaluation Report.

Document Availability

The Consolidated Plan, any amendments, the Action Plans, and the CAPER will be made available and accessible to the public, including various social service providers, groups that represent or serve persons with low- and moderate- incomes, persons living in slum and blighted areas and in areas where CDBG funds are proposed to be used, persons with special needs, residents of public housing, persons who are homeless, members of minority groups, persons with disabilities and non-English speaking persons. Public access includes the availability of materials in a form accessible to persons with disabilities. A sign language interpreter will be provided within (2) business days for any person requesting assistance at a public meeting related to these plans. Translators will also be provided for any non-English speakers within two (2) business days of a request.

These plans will be made available for public inspection and review during regular business hours in the following locations:

- Clay County ~~Planning & Zoning Department~~[Department of Community and Social Services](#)
- all five (5) public libraries
- Clay County website

Access to Records and Information

The public will be provided with reasonable access to records, subject to all local, state and federal laws regarding privacy and obligations of confidentiality, during the public comment periods. Interested persons and groups, including those that are or may be affected, will have the opportunity to receive information, review and submit comments on any proposed submission concerning funds available and the estimated amount expected to benefit low- and moderate- income residents.

Additional Public Participation Tools

- Flyers or brochures placed in public libraries;
- County's website;
- Public Notices may be provided in languages other than English and Spanish, if needed;
- Email announcements will be shared with agencies and community leaders; and
- Communications with other local governments and jurisdictions in the region.

Complaints and Grievance Procedures

The County shall provide a written response within fifteen (15) working days of all complaints expressed verbally or in writing at the public hearing. The nature of the complaint, referrals made, and final disposition of the complaint will be recorded and included with the final document submitted to HUD. Complaints and/or comments will be directed to the ~~Planning and Zoning Director~~[Department of Community and Social Services](#).

Provision of Technical Assistance

Technical assistance is intended to increase citizen participation in the community development decision making process and to ensure that such participation is meaningful. Technical assistance shall also be utilized to foster public understanding of federal program requirements.

The ~~Planning & Zoning Department~~[Department of Community and Social Services](#) Staff will provide technical assistance to citizens and community groups in identifying if their projects are eligible for CDBG funding and putting together their applications. Staff will also help applicants understand the rules and regulations in using CDBG funds.

Technical assistance about the program may include:

- interpreting the CDBG and HOME program rules
- regulations, procedures and/or requirements
- providing information and/or materials concerning the CDBG or HOME programs

Potential funding activities may include:

- Site Planning
- Feasibility Analysis
- Environmental Assessment
- Seed money for architectural and engineering feasibility reports
- Assisting low- and moderate-income citizens, and residents of blighted neighborhoods to:
 - develop statements of views;
 - identify their needs; or
 - develop activities and proposals for projects which, when implemented, will resolve those needs.

County staff members will neither prepare applications, nor appear as advocates for or against specific project proposals.

Definitions

Consolidated Plan: A five-year strategic plan is prepared as required by 24 CFR Part 91. This planning document of the County describes identified needs and goals for community planning, development programs, and housing programs during the designated five-year period. The plan is submitted to HUD on or before August 15 prior to the start of the first year of the new five-year period. It allows the County to apply for funding under the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Shelter Grants (ESG) programs.

Annual Action Plan: An annual action plan is prepared for each year of the five-year Consolidated Plan and specifies the amount of funding the County anticipates receiving from HUD, and related program income, under the CDBG, HOME and ESG programs. It describes the activities/projects to be undertaken to address the needs and priorities identified in the Consolidated Plan. It is submitted to HUD on or before August 15 of each year and serves as the annual application for funding for the grant year that begins October 1st and ends September 30th.

Consolidated Annual Performance and Evaluation Report (CAPER): This annual report provides details of the County's performance in administering the funds provided under the CDBG, HOME, and ESG programs during the previous grant year. The document also tracks the progress made towards the five-year goals established in the Consolidated Plan. It describes how funds were allocated and the extent to which funds benefitted low- and moderate-income persons. The CAPER is submitted within 90 days of the end of the grant year (by December 30th), and it is the basis for an evaluation of annual accomplishments and progress towards goals established in the Consolidated Plan.