



AGENDA

Citizens' Advisory Committee for Community Development

September 26, 2017

Second (2nd) Floor West Conference Room, Busch Municipal Building

840 N Boonville Avenue

At 6:00 p.m.

1. Attendance
2. Welcome and Introductions
3. Approval of Minutes
 - a. August 22, 2017 CACCD Meeting
4. Discussion & Review – Amendment of the Citizen Participation Plan
5. Public Hearing – Amendment of the Citizen Participation Plan
6. New Business
7. Next meeting: October 24, 2017, 6:00 p.m.
8. Adjournment

NOTE: In accordance with ADA guidelines, if you need special accommodations when attending any City meeting, please notify the City Clerk's office at 864-1443 at least 3 days prior to the scheduled meeting. For all other questions please contact Bob Atchley at 864-1308.

Planning and Development Department

Busch Municipal Building • 840 Boonville Avenue

Springfield, Missouri 65802 • 417-864-1031 • springfieldmo.gov



City of Springfield, Missouri

Citizen Participation Plan

2017

OVERVIEW

The Citizen Participation Plan is the process by which the City of Springfield identifies the policies and procedures to be used to encourage citizen participation and involvement in programs and activities under the U.S. Department of Housing and Urban Development (HUD) Five-year Consolidated Plan. The Five-year Consolidated Plan identifies the City's housing, homeless, community and economic development needs and establishes goals and strategies for addressing those needs, including the use of Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds. The Citizen Participation Plan sets forth the mutual rights, duties and responsibilities of both the City and participating citizens and citizens' groups.

HUD PROGRAMS

The City of Springfield receives two entitlement grants from the U.S. Department of Housing and Urban Development (HUD), to help address the City's affordable housing, homeless, community and economic development needs.

1. **Community Development Block Grant Program (CDBG)**

Title I of the Housing and Community Development Act of 1974 (PL 93-383) created the CDBG program. It was re-authorized in 1990 as part of the Cranston-Gonzalez National Affordable Housing Act. The primary objective of the CDBG program is to develop viable urban communities by providing decent housing and a suitable living environment and by expanding economic development opportunities for persons of low and moderate income. The City develops locally defined programs and funding priorities for CDBG, but activities must address one or more of the national objectives of the CDBG program. The three national objectives are: (1) to benefit low- and moderate- income persons; (2) to aid in the prevention or elimination of slums or blight; and/or (3) to meet other urgent community development needs. The City of Springfield's CDBG program emphasizes activities that directly benefit low and moderate-income persons.

2. **HOME Investment Partnerships Program (HOME)**

HOME was introduced in the Cranston-Gonzalez National Affordable Housing Act of 1990 and provides funding for housing rehabilitation, new housing construction, acquisition of affordable housing, and tenant-based rental assistance.

LEAD AGENCY

The Planning & Development Department is designated by the Springfield City Council as the lead agency for the administration of the CDBG and HOME grant programs. Through the U.S. Department of Housing and Urban Development (HUD) the Planning & Development Department administers the CDBG and HOME programs. As the lead agency for HUD, the Planning & Development Department is responsible for developing the 5-Year Consolidated, Annual Action Plans, the Consolidated Annual Performance Evaluation Report (CAPER) and amendments to the Citizen Participation Plan.

Copies of this Citizen Participation Plan can be obtained at any Springfield Branch of the Springfield-Green County Library or on the City's website at <https://www.springfieldmo.gov/850/Document-Library>.

CITIZEN PARTICIPATION

The City of Springfield encourages all citizens to participate in the development and review of the:

- HUD Five-Year Consolidated Plan
- Annual One-Year Action Plan
- Substantial Amendments to the Consolidated Plan and/or the Annual Action Plan
- Consolidated Annual Performance and Evaluation Report (CAPER)
- Amendments to the Citizen Participation Plan

Citizens will be given reasonable notice and an opportunity to comment on all Consolidated Plans, Annual Action Plans, Substantial Amendments, CAPERs and Amendments to Citizen Participation Plans.

Although the City encourages the participation of all of its citizens, the emphasis of this Plan is on encouraging and insuring the participation of low- and moderate-income persons, particularly those living in slum and blighted areas, residents of predominantly low- and moderate-income neighborhoods, minorities, non-English speaking persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons/agencies and residents of public and assisted housing developments. Persons needing special accommodations when attending any City meeting will be required to notify the City Clerk's office at (417) 846-1443 at least three (3) days prior to a scheduled meeting.

Who are residents of predominantly low- and moderate-income neighborhoods in Springfield?

People who live in continuous areas bound by roads or natural features (creeks, etc.) where more than half of the area's residents fall below HUD's "moderate income" guidelines are considered residents of predominantly low- and moderate-income neighborhoods for the purposes of this plan.

CITIZEN COMMENT

The City of Springfield shall provide for citizens' comment and input through various means:

1. Public Hearings
2. Published Comment Periods
3. Citizens' Advisory Committee for Community Development (CACCD) Public Hearings
4. Springfield City Council Public Hearings

NOTIFICATION OF INPUT OPPORTUNITIES

The City of Springfield will provide a variety of notifications highlighting citizen input opportunities, including the use of social media and direct communications to organizations and agencies serving target populations.

CITIZEN REPRESENTATION

CITIZEN ADVISORY COMMITTEE FOR COMMUNITY DEVELOPMENT (CACCD)

The Citizens' Advisory Committee for Community Development (CACCD) is an appointed body with advisory responsibilities to the City Council. In fact, the chief responsibility of the CACCD shall be to make recommendations to the City Council on the City's CDBG and HOME programs, particularly during times when funding allocations are being proposed for City Council adoption. The CACCD shall base recommendations to the City Council solely on an objective basis and in conformance with adopted policies, procedures and priorities of the City Council. The Committee shall avoid ex parte communications during the process of deliberation on funding recommendations, which could alter its objectivity. It shall be the charge of the CACCD to avoid any individual or collective conflict of interest in development of its recommendations to the City Council.

The membership of the CACCD shall consist of nine (9) members, each with three (3) year terms, who shall be appointed by the City Council. Appointments shall be staggered so that there will be three terms which expire each year. All members of the CACCD shall be legal residents of the City of Springfield, Missouri.

NEIGHBORHOOD ADVISORY COUNCIL (NAC)

The Neighborhood Advisory Council (NAC) is an advisory board, created to increase communication between organized neighborhood associations, City Council and City staff. Although the NAC is not tasked specifically with the review of the City's HUD funded programs, the City shall provide a copy of the HUD plans and reports to the membership via direct email solicitation, to allow the organization an opportunity to review and comment and to provide representatives the opportunity to share this information with their many neighborhood association members.

NOTIFICATION LISTS

The City of Springfield has an ongoing listing of groups and organizations that are sent direct emails regarding affordable housing openings and other notifications. The City shall provide a copy of the HUD plans and reports to the notification lists via a direct email solicitation. These lists include people and organizations that represent low- and moderate-income persons, persons living in slum and blighted areas, residents of predominantly low- and moderate-income neighborhoods, minorities, non-English speaking persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons/agencies, residents of public and assisted housing developments, local and regional institutions, and other organizations. Examples in this list of organizations include:

- NAACP
- Springfield Public Schools
- The Salvation Army
- Grupo Latinoamericano
- Women Infants & Children (WIC)
- Boys & Girls Town of Missouri
- Affordable Housing Action Board (AHAB)
- Family Violence Center
- Springfield Community Land Trust (SCLT)
- Greene County Children's Division
- Missouri Career Center
- Cox Health Center (Hospital)
- Burrell Mental Health Center
- Aids Project of the Ozarks
- Good Samaritan Boys Ranch
- Habitat for Humanity
- Ozarks Alliance to End Homelessness (Continuum of Care)
- Numerous Local Churches
- The Arc of the Ozarks (Development Disabilities Organization)
- The African American Agenda Collaborative
- Legacy Counseling, LLC
- Easy Living, Inc. (Development Disabilities Organization)
- Springfield Community Center
- Southwest MO Center for Independent Living
- Veterans Coming Home
- Community Partnership of the Ozarks
- Housing Authority of Springfield (HAS)
- Recovery Outreach Services
- Abilities First (Development Disabilities Organization)
- Veteran's VASH Program
- Missouri Department of Health and Senior Services
- Hand-in-Hand Multicultural Center
- Jordan Valley Community Health Center

*Please note that this is not a comprehensive list.

LOCAL AND REGIONAL INSTITUTIONS

- Chamber of Commerce
- United Way of the Ozarks
- Council of Churches
- Ozarks Transportation Organization
- The Fairbanks
- Community Collaboratives
- Community Foundation of the Ozarks
- Missouri Job Center

*Please note that this is not a comprehensive list.

CONSOLIDATED PLAN

A Consolidated Plan with a housing and non-housing component shall be adopted by the City Council to survey needs, establish priorities and govern in the selection of projects. This plan shall cover a period of five (5) years. It shall identify the City's housing, homeless, community and economic development needs and specify short term and long term objectives for CDBG funding, HOME funding, as well as funding for programs and projects from other resources.

There are several requirements included as a part of this plan to encourage citizen participation in the development of the Consolidated Plan. Initially, the City shall make available to citizens, public agencies, and other interested party's information that includes the amount of assistance the jurisdiction expects to receive including grant funds and program income and the range of activities that will be undertaken. This shall also include the estimated amount that will benefit persons of low-and-moderate income households. Even though the City expects no displacement to occur, the City will make every effort to minimize displacement of persons and to assist any persons displaced. The City's Plan shall state the types and levels of assistance the City will make available (or require others to make available) to persons displaced. The Plan shall be adopted prior to the allocation process for the initial year covered under the identified program period, at the discretion of the City Council. There shall be an annual Action Plan for each incremental year of the Consolidated Plan. To reach this goal, the City shall complete the following items:

1. Publish a statement of intent and notice of public hearing in the local newspaper of greatest circulation at least fifteen (15) days prior to the public hearing of the Citizens' Advisory Committee for Community Development. The statement of intent shall reference the method of access to HUD related data.
 - a. Further notification shall be provided via the City's website and social media.
2. Hold a public hearing of the Citizens' Advisory Committee for Community Development; inviting input on the Needs Assessment, Proposed Activities, and Strategy portions of the Consolidated Plan.

There are several groups that will specifically be included in the citizen participation aspect of the process as follows:

- a. Lead-based Paint -- When preparing the portion of the Consolidated Plan, the City shall consult with state or local health and child welfare agencies and examine existing data related to lead based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead poisoned.
- b. Priority Non-Housing Needs -- When preparing the description of the non-housing priority needs, the City shall consult with adjacent local governments when possible or applicable for needs and services that involve multiple jurisdictions.

- c. Public Housing -- When preparing the housing section of the Consolidated Plan, the City shall consult with the local public housing authority to identify needs and strategies to address those needs.
- 3. Provide information to social service agencies, churches, housing agencies, and other not-for-profit organizations regarding the program and invite input. Once the draft Consolidated Plan is completed, the City shall make the document available to the general public and provide reasonable opportunity for organizations to examine the content and provide comment on the Plan. To reach this goal, the City shall complete the following steps:

- a. Publish a summary of the draft Consolidated Plan in the local newspaper of greatest circulation inviting public comment for a period no less than thirty (30) calendar days.

This summary shall include, at minimum, the purpose and contents of the draft Consolidated Plan and shall include a list of the locations where copies of the entire proposed Consolidated Plan may be examined. Additionally, the Plan shall be made available electronically to citizens or organizations requesting copies. A reasonable number of hard copies shall be provided to citizens or agencies that do not have electronic viewing capabilities.

- b. A copy of the Consolidated Plan will be made available on the City of Springfield's website. Notification of this placement shall be provided via social media outlets.
 - c. Make copies of the proposed Consolidated Plan available at public libraries, government offices, and other public places.

The City shall consider all comments which are received in writing or orally at the public hearing in preparing the final Consolidated Plan. To accomplish this goal, the City shall prepare a summary of public comments received and a summary of any comments not accepted into the plan and the reasons therefore, which shall be incorporated as a part of the final Consolidated Plan

- 4. To involve the affected public in the citizen participation process, one public hearing shall be held before the City Council with notice published in a newspaper of general circulation.

ANNUAL ACTION PLAN

The Annual Action Plan is a one (1) year plan that implements initial elements of the Consolidated Plan. The Annual Action Plan includes funding priorities and anticipated accomplishments from each project. There are several requirements included as a part of this plan to encourage citizen participation in the development of the Annual Action Plan. The City initially shall make available to citizens, public agencies, and other interested parties information that includes the amount of assistance the jurisdiction expects to receive including grant funds and program income and the range of activities that will be undertaken. This shall also include the estimated amount that will benefit persons of low-and-moderate income households. All parties or organizations known to have an interest in submitting potential projects for funding shall be contacted by mail and provided access to appropriate materials for making application for the funds available. To reach this goal, the City shall complete the following steps:

1. Publish a statement of intent and notice of public hearing on an annual basis in the local newspaper of greatest circulation at least fifteen (15) days prior to the public hearing.
 - a. Further notification shall be provided via the City's website and social media.
2. Following the receipt of proposals, a joint, public hearing shall be held before the City Council and the Citizens' Advisory Committee for Community Development. This hearing shall be held for reviewing proposals and public review and comment on Proposed Activities.
3. Once the draft Annual Action Plan is completed, the City shall make available to the general public the document and provide reasonable opportunity for organizations to examine the content and provide comment on the Plan. To reach this goal, the City shall complete the following items:
 - a. Publish a summary of the Annual Action Plan in the local newspaper of greatest circulation inviting public comment for a period no less than thirty (30) calendar days. Further notification shall be provided via the City's website and social media.
 - b. Make copies of the proposed Annual Action Plan available at public libraries, government offices, and other public places. This summary shall include, at minimum, the purpose and contents of the Annual Action Plan and shall include a list of the locations where copies of the entire proposed Annual Action Plan may be examined. Additionally, the Plan shall be made available electronically to individuals or organizations requesting copies. A reasonable number of hard copies shall be provided to citizens or agencies that do not have electronic viewing capabilities.
4. The City shall consider all comments which are received in writing or orally at the public hearings in preparing the final Annual Action Plan. To accomplish this goal, the City shall prepare a summary of public comments received and a summary of any comments

not accepted into the plan and the reasons therefore, which shall be incorporated as a part of the final Annual Action Plan.

5. The City Council shall hold a public hearing prior to the submission of the Annual Action Plan to HUD. The purpose of this public hearing shall be to offer an additional opportunity for citizen comment and participation.

Once the citizen participation and public comment period has been completed, the City will submit the final Annual Action Plan at least forty-five (45) days before the start of the program year.

CONSOLIDATED PLAN AND ANNUAL ACTION PLAN AMENDMENTS

SUBSTANTIAL CHANGE

It shall be considered a substantial change in objectives and projected use of funds described in the Action Year Plan whenever the City adds a new activity; materially changes the scope, purpose, location or beneficiaries of an activity; or, adjusts the CDBG budget by an amount exceeding 10% of the total amount of available funds for the program year.

PROCESS FOR AMENDMENT

Once a need for a substantial change has been determined, the City will adhere to the following procedure:

1. Publish a statement of intent and notice of public hearing in the local newspaper of greatest circulation at least fifteen (15) calendar days prior to the date of the public hearing.
 - a. Further notification shall be provided via the City's website and social media.
2. The Citizens' Advisory Committee for Community Development shall hold a public hearing inviting input regarding the proposed amendment.
3. Accept public comments for a period not less than thirty (30) calendar days on the substantial amendment following the public hearing. Any comments received either written or orally at the public hearing and during the thirty-day (30) comment period shall be considered in preparing the substantial amendment. A summary of these comments or views and a summary of the views not accepted and the reasons therefore shall be attached to the final amendment. The draft amendment shall be presented to the City Council for adoption by ordinance.
4. The draft amendment shall be presented to the City Council for adoption by ordinance.

NON-SUBSTANTIAL CHANGE

A non-substantial change is defined as any change or alteration that will not constitute a substantial change as defined above under SUBSTANTIAL CHANGE. Examples of non-substantial change may include cancellation of a previously approved activity due to unforeseen circumstances that have caused significant delays or unreasonable cost burdens, removal and reallocation of funds remaining after an activity is completed as approved, and increase of activity budget to make up the shortage to secure a contract. The City (Grantee) Staff responsible for overseeing and managing the CDBG Program will have authority to approve and implement non-substantial changes on an as-needed basis as part of the CDBG program administration.

AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH) & ASSESSMENT OF FAIR HOUSING (AFH) PLAN

On March 14, 2016, the U.S. Department of Housing and Urban Development (HUD) issued a notice providing guidance to cities incorporating the 24 CFR Part 5 Affirmatively Furthering Fair Housing (AFFH) rule into the requirements of 24 CFR 91.10 – Consolidated Program Year and 24 CFR 91.115 – for the Citizen Participation Plan. The new AFFH rule requires cities to set forth a meaningful and transparent process to identify and understand local and regional fair housing issues and set goals for improving fair housing choice and access to opportunity.

The goal of the AFFH rule is to utilize local and regional data to better understand fair housing issues and to establish fair housing priorities and goals. Such data is intended to make participants better able to evaluate fair housing issues, including: segregation, conditions that restrict fair housing choice, and disparities in access to housing and opportunity. To reach this goal, the City shall complete the following steps:

1. Publish a statement of intent and notice of public hearing in the local newspaper of greatest circulation at least fifteen (15) days prior to the public hearing.
 - a. Further notification shall be provided via the City's website and social media.
2. Hold a public hearing by the Citizen's Advisory Committee for Community Development inviting input on fair housing issues and needs.
3. Provide information to social service agencies, churches, housing agencies, and other not-for-profit organizations regarding the AFFH rule and the AFH plan and invite input.
 - a. Publish a summary of the Assessment of Fair Housing in the local newspaper of greatest circulation inviting public review and comment for a period no less than thirty (30) calendar days.
4. To involve the affected public in the citizen participation process, one public hearing shall be held before the City Council with notice published in a newspaper of general circulation.
5. Any comments received either written or orally at the public hearing and during the thirty-day (30) comment period shall be considered in preparing the substantial amendment. A

summary of these comments or views and a summary of the views not accepted and the reasons therefore shall be attached to the final amendment.

Once the citizen participation and public comment period has been completed, the City of Springfield will submit the final City council-approved Assessment of Fair Housing Plan to the U.S. Department of Housing and Urban Development (HUD).

REVISIONS TO AFH

A HUD accepted AFH must be revised and re-submitted to HUD for review when:

1. A material change occurs. A material change is one that both a) impacts the circumstances in the City which may include natural disasters, significant demographic changes, new significant contributing factors, and civil rights findings and b) causes alterations to the AFH's analyses, contributing factors, priorities, and/or goals.
2. The City receives a written notification from HUD specifying a material change to the regulations.

PERFORMANCE REPORTS

The final aspect of citizen participation is regarding the performance of the program. The City will adhere to the following process:

1. Publish a statement of intent and notice of public hearing in the local newspaper of greatest circulation at least fifteen (15) calendar days prior to the public hearing.
 - a. Further notification shall be provided via the City's website and social media.
2. The Citizens' Advisory Committee for Community Development shall hold a public hearing inviting input regarding the final performance report, officially titled Consolidated Annual Performance and Evaluation Report (CAPER), for the previous program year. This public hearing shall be held annually not more than ninety (90) calendar days after the completion of the most recent program year, which shall outline the status of all activities as of the end of the Program Year.
3. Public comments will be accepted for a period not less than fifteen (15) calendar days to receive comments on the draft CAPER. Any comments received either written or orally at the public hearing shall be considered in preparing the final performance report. A summary of these comments or views and a summary of the views not accepted and the reasons therefore shall be attached to the final report.

DISPLACEMENT

The City of Springfield does not intend to undertake any activities funded by the U.S. Department of Housing and Urban Development (HUD) that would cause either temporary or permanent displacement of an individual or family. However, the City is required to have a Plan in place should such an event occur.

The Plan contains three major components.

1. **One-For-One Replacement of Low and Moderate Income Dwelling Units**

All occupied and vacant low- and moderate-income dwelling units that are demolished or converted to a use other than as low-and-moderate-income housing as a direct result of any activity assisted under the Section 104(d) of the Housing and Community Development Act of 1974, as amended, will be replaced with low and moderate-income dwelling units within three years of commencement of the activity.

2. **Relocation Assistance**

The City of Springfield will ensure that relocation assistance is provided as described in 24 CFR 507.606 to each low to moderate-income person who is displaced by the demolition or by the conversion of a low/moderate income dwelling unit to another use as a direct result of a CDBG assisted activity. When needed, relocation notices will be distributed to the affected persons in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

3. **Steps to Minimize Displacement**

City of Springfield will take the following steps to minimize the involuntary displacement of low-and moderate-income persons when CDBG funds are involved:

- a. All CDBG applications will be reviewed to determine whether involuntary displacement is likely to occur. Those applications involving displacement will receive a lower priority recommendation for funding unless it can be shown that alternatives are not available.
- b. Applicants who utilize CDBG funds to rehabilitate or convert a lower-income unit to a non-residential use will be required to supply replacement housing as well as relocation assistance.
- c. The cost of any required relocation assistance and the provision of replacement housing will be borne by the applicant.

The City will also use the applicable HUD Brochures to inform residents/ businesses of their rights.

GENERAL PROCESS

PUBLIC HEARING

The following procedures shall be followed regarding public hearings:

1. No less than fifteen (15) calendar days' notice will be provided to the public for a public hearing.
2. Public hearings shall be advertised in the local newspaper of greatest circulation. The notice will include adequate information regarding the subject of the hearing to encourage informed comment.
 - a. Further notification shall be provided via the City's website and social media.
3. All public hearings shall be held at times and locations convenient to potential attendees. Meeting times will generally avoid normal business hours (8-5 M-F) and be accessible to persons with disabilities including access to public transit. In accordance with ADA guidelines, persons needing special accommodations when attending any City meeting will be required to notify the City Clerk's office at (417) 846-1443 at least three (3) days prior to the scheduled meeting.
4. If a public hearing is planned and it can be reasonably anticipated that a significant number of non-English speaking participants will be in attendance, the City will provide a translator for the meeting.
5. A copy of the Consolidated Plan, the Annual Action Plan, any Substantial Amendments to the Consolidated Plan and the Annual Action Plan, the CAPER, and Amendments to the Citizen Participation Plan will be provided to the City's Notification List and to the full membership of the Neighborhood Advisory Council (NAC) or other similar group via a direct email solicitation; seeking additional public review and comment.

ACCESS TO RECORDS

The City shall ensure that citizens, public agencies, and other interested parties have reasonable and timely access to information and records pertaining to the City's Consolidated Plan and projects for a minimum of the preceding five (5) years.

Information and records will be available to the public in a form accessible to persons with disabilities, upon request.

TECHNICAL ASSISTANCE

The City shall provide for two (2) technical assistance sessions per program year to provide guidance to groups representative of low- and moderate-income persons in developing proposals and completing necessary proposal forms for assistance under the formal CDBG allocation process. The initial technical assistance meeting is held immediately after the solicitation for discretionary public service projects. The second technical meeting is held with the sub grantees that have been selected for CDBG funding for public service projects. A direct email solicitation is sent out for both technical meetings.

COMPLAINTS

Should a citizen complaint be received regarding the Consolidated Plan, Annual Action Plan, Plan Amendments, Performance Reports, or the Citizen Participation Plan, the City will adhere to the following process:

1. Complaints must be submitted in writing to the Planning & Development Department of the City of Springfield.
2. Where practicable, all complaints will be initially responded to in writing within fifteen (15) working days from the date of receipt of the complaint.