

COLUMBUS CONSOLIDATED GOVERNMENT
CITIZEN PARTICIPATION PLAN

RELATING TO THE ADMINISTRATION OF
THE COMMUNITY PLANNING & DEVELOPMENT PROGRAMS
OF THE U.S. DEPARTMENT OF HOUSING
AND URBAN DEVELOPMENT (HUD)

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Table of Contents

A. Introduction.....	3
B. Encouragement of Citizen Participation.....	4
D. The Assessment of Fair Housing (AFH).....	12
E. The Consolidated Plan (CP).....	17
F. The Annual Action Plan (AAP).....	23
G. Consolidated Annual Performance and Evaluation Report (CAPER).....	29
H. Section 108 Loan Guarantee Program.....	30
I. Complaints.....	31

A. Introduction

Purpose

Pursuant to the citizen participation requirements of 24 CFR Section 91.105 and 24 CFR Part 5, the Columbus Consolidated Government, hereinafter referred to as the “City”, sets forth the following Citizen Participation Plan as it relates to the administration of the Community Planning and Development (CPD) programs funded by the U.S. Department of Housing and Urban Development (HUD). The Citizen Participation Plan presents the City’s plan for providing for and encouraging all citizens to participate in the development, revision, amendment, adoption, and implementation of:

- 1) The Citizen Participation Plan
- 2) The Assessment of Fair Housing (AFH), Analysis of Impediments to Fair Housing Choice (AI), or any other successor study or report for the purpose of evaluating the City’s affirmative commitment to fair housing
- 3) The Consolidated Plan (CP)
- 4) The Annual Action Plan (AAP)
- 5) The Consolidated Annual Performance and Evaluation Report (CAPER),
and
- 6) The Section 108 Loan Guarantee Program

Lead Agency

The Community Reinvestment Department is the lead agency responsible for the administration of the Community Development Block Grant Program (CDBG), including the Section 108 Loan Guarantee Program, and the HOME Investment Partnerships Program (HOME).

Effective Date

Subsequent to approval of this Citizen Participation Plan by the City, the Plan shall be effective until it is amended or otherwise replaced.

B. Encouragement of Citizen Participation

General

The City provides for and encourages citizens to participate in the development, revision, amendment, adoption and implementation of the Citizen Participation Plan, the Assessment of Fair Housing, the Consolidated Plan, the Annual Action Plan, and the CAPER. The City encourages participation by low- and moderate-income persons, particularly those living in areas designated as revitalization areas or in slum and blighted areas and in areas where HUD funds are proposed to be used, and by residents of predominantly low- and moderate- income neighborhoods. With respect to the public participation initiatives included in this Plan, the City will take appropriate actions to encourage the participation of all its citizens, including minorities, non-English speaking persons, and persons with disabilities, as described below.

*If virtual hearings are used, real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Also, the virtual hearing method will only be used in lieu of an in-person hearing if national or local health authorities recommend social distancing and limit public gatherings for public health reasons.

Non-English Speakers

The City has determined that Spanish speakers who speak English less than very well comprise 2.3% of its population age 5 years and older based on 2009-2014 American Community Survey data.

To encourage these residents to participate in the development of the Assessment of Fair Housing and the Consolidated Plan, the City will undertake the following initiatives in addition to publishing advertisements in the *Ledger-Inquirer* for these activities:

- At least one stakeholder interview or focus group session will be scheduled during the stakeholder consultation processes for each and will focus on persons with limited English proficiency, and

- The City will provide a Spanish version of meeting agendas, handouts and surveys at meetings and stakeholder interviews conducted for each planning process.

Persons with Disabilities

To encourage the participation of persons with disabilities, the City will continue to include the following language in all of its public meeting notices published in the *Ledger-Inquirer*:

The building is handicapped accessible. Persons requiring special accommodations can make arrangements by contacting the Community Reinvestment Department, 420 Tenth Street, Columbus, GA 31901 (phone 706- 653-4613). The City TDD number is 1-800-225-0056.

The City will conduct all public meetings in locations that are handicapped-accessible, when available.

If requested, the City will mail copies of public meeting notices to persons who are homebound, and request such accommodation no less than seven days prior to the public meeting.

Low- and Moderate-Income Persons

When conducting in-person public meetings, the City will conduct at least one public meeting in a neighborhood that contains 51% low- and moderate-income residents based on HUD data, during the development of the Assessment of Fair Housing, the Consolidated Plan and the Annual Action Plan.

Organizations and Agencies

The City encourages the participation of local and regional institutions, the Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations in the process of developing, revising, amending, adopting and implementing all documents covered by this Plan. This will be achieved through stakeholder interviews, focus groups and/or public meetings held during the development,

revision, amendment, adoption and implementation processes for all documents covered by this Plan.

Local Public Housing Authorities

The City encourages, in consultation with local public housing agencies, the participation of residents of any public housing developments located within the City, in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan. The City will provide information to the executive directors of the Columbus Housing Authority and the Phenix City Housing Authority about the Assessment of Fair Housing, its affirmatively furthering fair housing strategy, and Consolidated Plan activities related to the public housing developments and communities so that the housing authorities can make this information available at the annual public hearings required for their respective Public Housing Authority Plans.

The City encourages participation by resident advisory boards and resident councils of local public housing authorities. This will be carried out by providing to the local housing authorities information on public meetings, surveys and other outreach initiatives related to the documents covered by this Plan.

Public Notices

Public review/comment periods and public hearings held in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan shall be advertised in the *Ledger-Inquirer* no less than seven days before the public review and comment period commences or the public hearing is held.

Public Hearings

All public hearings will be scheduled at times and locations that are convenient for potential and actual program beneficiaries, and with accommodation for persons with disabilities and Spanish speakers in accordance with this Plan.

Technical Assistance

Staff from the Community Reinvestment Department are available to assist organizations and other eligible individuals that are interested in submitting a

proposal to obtain funding through the CDBG and HOME programs. All potential applicants are strongly encouraged to contact the Department for technical assistance before initiating a funding request application.

Online Access

The City will post draft copies and final copies of all documents covered by this Plan on its website accessible at:

<http://www.columbusga.org/CommunityReinvestment/>

Other Engagement Techniques

The Citizen Participation Plan has been and will continue to be amended as the City continues to gain access to technology that improves the avenues of participation by its residents.

City Contact Person

All communication regarding the Citizen Participation Plan, the Assessment of Fair Housing, the Consolidated Plan, the Annual Action Plan, the CAPER, comments, complaints, reasonable accommodation for disabled persons, translation services, or other elements shall be directed to:

Robert Scott

Director of Community Reinvestment and Real Estate

Columbus Consolidated Government

420 10th Street

Columbus, GA 31901

Email: scott.robert@columbusga.org

Phone: (706) 225-3918

C. The Citizen Participation Plan

Plan Development

The City shall follow the following procedure when amending its Citizen Participation Plan.

a. Public Review of the Draft Plan

The draft Citizen Participation Plan will be made available for public review for a 30-day period prior to City consideration and adoption, and may be done concurrently with the public review and comment process for the Consolidated Plan. The Citizen Participation Plan shall be provided in a format accessible to persons with disabilities upon request.

Copies of the draft Citizen Participation Plan will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 420 10th Street, Columbus Consolidated Government Annex Building, 2nd Floor, Community Reinvestment Department
- 3111 Citizens Way, Columbus Consolidated Government, Citizen Services Center
- 3000 Macon Road, Columbus Public Library
- 640 Veterans Parkway, Mildred L. Terry Public Library
- 5689 Armour Road, North Columbus Public Library
- 2034 South Lumpkin Road, South Columbus Public Library

b. Public Hearing

The City will conduct a public hearing to accept comments on the draft Citizen Participation Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan.

c. Comments Received on the Draft Plan

Written comments will be accepted by the City Contact Person, or a designee, during the 30- day public review period.

d. City Council Action

Following the public hearing, the Plan will be presented to City Council for consideration and formal action. A summary of all written comments and those received orally during the public hearing, as well as the City's responses to all written comments, will be attached to the Plan prior to submission to City Council.

e. Submission to HUD

The Citizen Participation Plan will be approved as a stand-alone document and submitted to HUD with a summary of all written comments and those received orally during the public hearing as well as the City's responses to written comments and proof of compliance with the 30-day public review and comment period requirement. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

Amendments to the Approved Citizen Participation Plan

The City shall follow the following procedure to amend its approved Citizen Participation Plan, as needed.

a. Amendment Considerations

The City will amend the Citizen Participation Plan, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to its HUD programs. Substantial amendments to the Citizen Participation Plan may be required should a provision of the plan be found by the City to conflict with HUD regulations, or when changes in HUD regulations occur. Edits to the Plan that only include updated contact information or editorial changes for clarity will not be released for public review and comment.

*The CARES Act, American Rescue Plan Act, and other federal relief legislation have made available supplemental funding, to include

Community Development Block Grant Coronavirus (CDBG-CV) and HOME-ARP funds. The federal legislation adds additional flexibility for administration of both the supplemental funding and, in some cases, for the annual HUD entitlement CDBG and HOME grants in these unprecedented times. The public comment period is reduced to not less than 5 days, grantees may use virtual public hearings when necessary for public health reasons, the public services cap is suspended during the emergency, and States and local governments may reimburse costs of eligible activities incurred for pandemic response regardless of the date.

In addition, the CARES Act authorizes the Secretary of HUD to grant waivers and alternative requirements of statutes and regulations the Secretary administers in connection with the use of CDBG-CV funds and HUD fiscal year 2019 and 2020 CDBG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). Waivers and alternative requirements can be granted when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus. Other similar waivers have been issued by HUD and may be issued in the future concerning other funding streams and program years.

These edits do not change current citizen participation policies but permit modifications to allow for necessary expedited actions during times of declared disaster or emergencies.

b. Draft Amended Plan Review

The draft Amended Citizen Participation Plan will be made available for public review for a 15-day period prior to City consideration and adoption and may be done concurrently with the public review and comment process for the Consolidated Plan. Copies of the draft Amended Citizen Participation Plan will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 420 10th Street, Columbus Consolidated Government Annex Building, 2nd Floor, Community Reinvestment Department

- 3111 Citizens Way, Columbus Consolidated Government, Citizen Services Center
- 3000 Macon Road, Columbus Public Library
- 640 Veterans Parkway, Mildred L. Terry Public Library
- 5689 Armour Road, North Columbus Public Library
- 2034 South Lumpkin Road, South Columbus Public Library

c. Comments Received on Draft Amended Citizen Participation Plan

Written comments will be accepted by the City Contact Person, or a designee, during the public review period.

d. Public Hearing

The City will conduct a public hearing to review and accept public comments on the draft Amended Citizen Participation Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan.

e. City Council Action

Following the public hearing, the Plan will be presented to City Council for consideration and formal action.

f. Submission to HUD

A copy of the Amended Citizen Participation Plan, including a summary of all written comments and those received during the public hearing as well as the City's responses and proof of compliance with the 15-day public review and comment period requirement, will be submitted to HUD. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

Plan Access

The approved Amended Citizen Participation Plan will be kept on file at the Community Reinvestment Department office located in the Government Annex Building at 420 Tenth Street, Columbus.

The plan can be accessed online at:

<http://www.columbusga.org/CommunityReinvestment/>

Hard copies can be made available to those requesting the approved Amended Plan by contacting the City Contact Person, or a designee.

D. The Fair Housing Study (AFH, AI, or successor study)

Plan Development

The City will follow the process and procedures described below in the development of its Assessment of Fair Housing (AFH), Analysis of Impediments to Fair Housing Choice (AI), or any other successor study or report for the purpose of evaluating the City's affirmative commitment to fair housing.

a. HUD-approved Data for Public Review

No later than the date of the first public hearing on the AFH/AI (see part c below), the HUD-provided data and other supplemental data will be made available to the general public. The data will be made available online and accessible at <http://www.columbusga.org/CommunityReinvestment/>. This may include a link to HUD's website where the data can be readily accessed. The data will also be made available during the stakeholder consultation and citizen outreach initiatives conducted during the preparation of the AFH/AI.

b. Stakeholder Consultation and Citizen Outreach

In the development of the AFH/AI, the City will consult with other public and private agencies including, but not limited to, the following:

- Local public housing authorities
- Other assisted housing providers
- Social service providers including those focusing on services to minorities, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes

- Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws
- Regional government agencies involved in metropolitan-wide planning and transportation responsibilities

A variety of mechanisms may be utilized to solicit input from these entities. These include telephone or personal interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

c. Public Hearings

To obtain the views of the general public on fair housing-related data and affirmatively furthering fair housing in the City's housing and community development programs, the City will conduct at least two public hearings on the AFH/AI.

The first public hearing shall be held before the draft AFH/AI is published for comment, and will solicit input on fair housing issues in the City.

The second public hearing will be conducted during or after the 30-day public comment period during which the City will address identified factors contributing to fair housing issues, and proposed fair housing goals and priorities for affirmatively furthering fair housing.

d. Public Display and Comment Period

The draft AFH/AI will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of the content and purpose of the draft AFH/AI, the dates of the public display and comment period, the locations where copies of the proposed document can be examined, how comments will be accepted, when the document will be considered for action by Council, and the anticipated submission date to HUD. Copies of the draft AFH/AI will be made available for public review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 420 10th Street, Columbus Consolidated Government Annex Building, 2nd Floor, Community Reinvestment Department
- 3111 Citizens Way, Columbus Consolidated Government, Citizen Services Center
- 3000 Macon Road, Columbus Public Library
- 640 Veterans Parkway, Mildred L. Terry Public Library
- 5689 Armour Road, North Columbus Public Library
- 2034 South Lumpkin Road, South Columbus Public Library

In addition, the City will make available a reasonable number of free copies of the proposed document to residents and groups that request them.

e. Comments Received on the Draft Fair Housing Study

Written comments will be accepted by the City Contact Person, or a designee, during the 30- day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at the public hearings, in preparing the final AFH/AI. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final AFH/AI for submission to City Council and to HUD.

f. City Council Action

Following the public hearing, the AFH/AI will be presented to City Council for consideration and formal action.

g. Submission to HUD

The Assessment of Fair Housing will be submitted to HUD no less than 270 days before the start of the City's five-year program cycle beginning in 2021. Thereafter, the AFH will be submitted to HUD no less than 195 calendar days before the start of the City's five-year program cycle beginning in 2026. Unless HUD requires or releases guidance indicating otherwise, an Analysis of Impediments to Fair Housing Choice or other successor fair housing study may be prepared by the City concurrently with the Consolidated Plan

covering the same 5-year program cycle; submission to HUD is not required.

Revisions to the Fair Housing Study

The City shall follow the following procedure to revise its AFH/AI, as needed.

a. Revision Considerations

The City will revise its AFH/AI under the following circumstances:

- A material change occurs. A material change is a change in circumstances in the City that affects the information on which the AFH/AI is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the Assessment no longer reflect actual circumstances. Examples include, but are not limited to:
 - Presidentially declared disasters, under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 *et seq.*), in the City that are of such a nature as to significantly impact the steps the City may need to take to affirmatively further fair housing
 - Significant demographic changes
 - New significant contributing factors in the City, and
 - Civil rights findings, determinations, settlements (including voluntary compliance agreements), or court orders
- Upon HUD's written notification specifying a material change that requires the revision.

b. Public Display and Comment Period

The draft Revised AFH/AI will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the proposed revised plan can be examined, how comments will be accepted, when the document will be considered for action by City Council, and the

anticipated submission date to HUD, if any. Copies of the draft Revised AFH/AI will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 420 10th Street, Columbus Consolidated Government Annex Building, 2nd Floor, Community Reinvestment Department
- 3111 Citizens Way, Columbus Consolidated Government, Citizen Services Center
- 3000 Macon Road, Columbus Public Library
- 640 Veterans Parkway, Mildred L. Terry Public Library
- 5689 Armour Road, North Columbus Public Library
- 2034 South Lumpkin Road, South Columbus Public Library

In addition, the City will make available a reasonable number of free copies of the proposed revised document to residents and groups that request it.

c. Comments Received on the Draft Revised Fair Housing Study

Written comments will be accepted by the City Contact Person, or a designee, during the 30- day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at public hearings, in preparing the final Revised AFH/AI. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised AFH/AI for submission to HUD.

d. City Council Action

Following the public hearing, the Revised AFH/AI will be presented to City Council for consideration and formal action.

e. Submission to HUD

If so required by HUD, the Revised Fair Housing Study will be submitted to HUD within 30 calendar days following the end of the public display and comment period.

Plan Access

The HUD-accepted AFH or final AI will be kept on file at the Community Reinvestment Department office located in the Government Annex Building at 420 Tenth Street, Columbus. The AFH can also be accessed online at <http://www.columbusga.org/CommunityReinvestment/>

Hard copies can be made available to those requesting the HUD-accepted AFH or final AI by contacting the City Contact Person, or a designee.

E. The Consolidated Plan (CP)

Plan Development

The City will follow the process and procedures described below in the development of its Consolidated Plan (CP).

The CARES Act, American Rescue Plan Act, and other federal relief legislation have made available supplemental funding, to include Community Development Block Grant Coronavirus (CDBG-CV) and HOME-ARP funds. The federal legislation adds additional flexibility for administration of both the supplemental funding and, in some cases, for the annual HUD entitlement CDBG and HOME grants in these unprecedented times. The public comment period is reduced to not less than 5 days, grantees may use virtual public hearings when necessary for public health reasons, the public services cap is suspended during the emergency, and States and local governments may reimburse costs of eligible activities incurred for pandemic response regardless of the date.

In addition, the CARES Act authorizes the Secretary of HUD to grant waivers and alternative requirements of statutes and regulations the Secretary administers in connection with the use of CDBG-CV funds and HUD fiscal year 2019 and 2020 CDBG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). Waivers and alternative requirements can be granted when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus. Other similar waivers have been issued by HUD and may be issued in the future concerning other funding streams and program years.

These edits do not change current citizen participation policies but permit modifications to allow for necessary expedited actions during times of declared disaster or emergencies.

a. Stakeholder Consultation and Citizen Outreach

In the development of the CP, the City will consult with other public and private agencies including, but not limited to, the following:

- Local public housing authorities
- Other assisted housing providers
- Social service providers including those focusing on services to minorities, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes
- Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws
- Regional government agencies involved in metropolitan-wide planning and transportation responsibilities

When preparing the portion of the CP concerning lead-based paint hazards, the City shall consult with local or state 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.

When preparing the description of priority non-housing community development needs, the City will notify adjacent units of local government, to the extent practicable. This shall involve, at a minimum, the city sending a letter to the chief elected official of each adjacent unit of government notifying them of the draft CP and how to access a copy online for review and comment. In addition, the City will submit its non-housing community development plan to the Georgia Department of Community Affairs.

A variety of mechanisms may be utilized to solicit input from these persons/service providers/agencies/entities. These include written letters, telephone or personal interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

b. Public Hearings

The City will conduct at least two public hearings annually to obtain residents' views and to respond to proposals and questions. The first public hearing will be conducted before the CP draft is published for public comment, during which the City will address housing and community development needs, development of proposed activities, the amount of assistance the City expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public hearing will be conducted during or after the 30-day public comment period during which the City will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing consistent with the Assessment of Fair Housing.

c. Potential Displacement of Persons

Although the City does not anticipate any residential displacement to occur in the foreseeable future, it is required to describe its plans to minimize the displacement of persons and to assist any persons displaced. When displacement is unavoidable on a temporary or permanent basis, the City will comply with the federal Uniform Relocation Act. Should displacement of residents be necessary as a result of the use of funds covered by this Plan, the City shall compensate residents who are actually displaced in accordance with *HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition*. This resource is accessible online at http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/13780.

d. Public Display and Comment Period

The draft CP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CP; the anticipated amounts of funding (including program income, if any); proposed activities likely to result in displacement, if any; plans for minimizing the displacement of persons as a result of CDBG or HOME activities, if any; plans to assist persons actually displaced by the project, if any; the dates of the public display and comment period; the locations where copies of the draft CP can be examined; how comments will be accepted; when the document will be considered for action by City Council; and, the anticipated submission date to HUD. Copies of the draft CP will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 420 10th Street, Columbus Consolidated Government Annex Building, 2nd Floor, Community Reinvestment Department
- 3111 Citizens Way, Columbus Consolidated Government, Citizen Services Center
- 3000 Macon Road, Columbus Public Library
- 640 Veterans Parkway, Mildred L. Terry Public Library
- 5689 Armour Road, North Columbus Public Library
- 2034 South Lumpkin Road, South Columbus Public Library

In addition, the City will make available a reasonable number of free copies of the draft document to residents and groups that request them.

e. Comments Received on the Draft Consolidated Plan

Written comments will be accepted by the City Contact Person, or a designee, during the 30- day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at the public hearings, in preparing the final CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CP for submission to City Council and to HUD.

f. City Council Action

Following the public hearing, the CP will be presented to City Council for consideration and formal action.

g. Submission to HUD

The CP will be submitted to HUD no less than 45 days before the start of the City's five-year program cycle.

Revisions to the Consolidated Plan

The City shall follow the following procedure to revise its CP, as needed.

a. Revision Considerations

There are two types of amendment that may occur with the CP: minor amendments and substantial amendments. An amendment to the approved CP is considered substantial under the following circumstances:

- When an eligible activity is added
- When a change occurs in the priorities established in the CP

All other changes that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by Community Reinvestment Department staff and will not be subject to public comments. These changes will be fully documented and signed by the City Manager.

The City may choose to submit a copy of each amendment to the CP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the City Manager.

b. Public Display and Comment Period

The draft Revised CP will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the proposed

revised CP can be examined, how comments will be accepted, when the document will be considered for action by City Council, and the anticipated submission date to HUD. Copies of the draft Revised CP will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 420 10th Street, Columbus Consolidated Government Annex Building, 2nd Floor, Community Reinvestment Department
- 3111 Citizens Way, Columbus Consolidated Government, Citizen Services Center
- 3000 Macon Road, Columbus Public Library
- 640 Veterans Parkway, Mildred L. Terry Public Library
- 5689 Armour Road, North Columbus Public Library
- 2034 South Lumpkin Road, South Columbus Public Library

In addition, the City will make available a reasonable number of free copies to residents and groups that request them.

For projects subject to waivers or other program flexibilities related to pandemic response or other emergency situations, the Columbus Consolidated Government may provide a 5-day notice/comment period for proposed amendments necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to emergency conditions.

c. Comments Received on the Draft Revised Consolidated Plan

Written comments will be accepted by the City Contact Person, or a designee, during the 30- day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at public hearings, in preparing the final Revised CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised CP for submission to City Council and to HUD.

d. City Council Action

Following the public hearing, the Revised CP will be presented to City Council for consideration and formal action.

e. Submission to HUD

The Revised CP will be submitted to HUD within 30 calendar days following the end of the public display and comment period.

Plan Access

The HUD-approved Revised CP will be kept on file at the Community Reinvestment Department office located in the Government Annex Building at 420 Tenth Street, Columbus. The plan can also be accessed online at:

<http://www.columbusga.org/CommunityReinvestment/>

Hard copies can be made available to those requesting the HUD-approved CP by contacting the City Contact Person, or a designee.

F. The Annual Action Plan (AAP)

The Annual Action Plan (AAP) is a component of the CP, and it describes the City's proposed use of available federal and other resources to address the priority needs and specific objectives in the CP for each program year; the City's method for distributing funds to local non-profit organizations; and, the geographic areas of the City to which it will direct assistance.

Plan Development

The City will follow the process and procedures described below in the development of its AAP.

The CARES Act, American Rescue Plan Act, and other federal relief legislation have made available supplemental funding, to include Community Development Block Grant Coronavirus (CDBG-CV) and HOME-ARP funds. The federal legislation adds additional flexibility for administration of both the supplemental funding and, in some cases, for the annual HUD entitlement CDBG and HOME grants in these

unprecedented times. The public comment period is reduced to not less than 5 days, grantees may use virtual public hearings when necessary for public health reasons, the public services cap is suspended during the emergency, and States and local governments may reimburse costs of eligible activities incurred for pandemic response regardless of the date.

In addition, the CARES Act authorizes the Secretary of HUD to grant waivers and alternative requirements of statutes and regulations the Secretary administers in connection with the use of CDBG-CV funds and HUD fiscal year 2019 and 2020 CDBG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). Waivers and alternative requirements can be granted when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus. Other similar waivers have been issued by HUD and may be issued in the future concerning other funding streams and program years.

These edits do not change current citizen participation policies but permit modifications to allow for necessary expedited actions during times of declared disaster or emergencies.

a. Public Hearings

The City will conduct at least two public hearings annually to obtain residents' views and to respond to proposals and questions. The first public hearing will be conducted before the AAP draft is published for public comment, during which the City will address housing and community development needs, development of proposed activities, the amount of assistance the City expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public hearing will be conducted during or after the 30-day public comment period during which the City will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing consistent with the Assessment of Fair Housing.

If virtual hearings are used, real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Also, the virtual hearing method will only be used in lieu of an in-person hearing if national or local health authorities recommend social distancing and limit public gatherings for public health reasons.

b. Public Display and Comment Period

The draft AAP will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of the AAP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by the Columbus City Council, and the anticipated submission date to HUD. Copies of the draft AAP will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 420 10th Street, Columbus Consolidated Government Annex Building, 2nd Floor, Community Reinvestment Department
- 3111 Citizens Way, Columbus Consolidated Government, Citizen Services Center
- 3000 Macon Road, Columbus Public Library
- 640 Veterans Parkway, Mildred L. Terry Public Library
- 5689 Armour Road, North Columbus Public Library
- 2034 South Lumpkin Road, South Columbus Public Library

In addition, the City will make available a reasonable number of free copies to residents and groups that request them.

For projects subject to waivers or other program flexibilities related to pandemic response or other emergency situations, the Columbus Consolidated Government may provide a 5-day notice/comment

period for proposed amendments necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to emergency conditions.

c. Comments Received on the Draft Annual Action Plan

Written comments will be accepted by the City Contact Person, or a designee, during the 30- day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at the public hearings, in preparing the final AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final AAP for submission to HUD.

d. City Council Action

Following the public hearing, the AAP will be presented to City Council for consideration and formal action.

e. Submission to HUD

The AAP will be submitted to HUD no less than 45 days before the start of the City's annual program year.

Revisions to the Annual Action Plan

The City shall follow the following procedure to revise its AAP, as needed.

a. Revision Considerations

There are two types of amendment that may occur with the AAP: minor amendments and substantial amendments. An amendment to the approved AAP is considered substantial under the following circumstances:

- When an eligible activity is added or deleted
- When a change occurs in the purpose, location, or beneficiaries of an activity previously approved
- When a 50 percent change in federal funding occurs where the project is \$25,000 or less

- When a 25 percent change in federal funding occurs where the project is more than \$25,000.

All other changes to the method of distribution or investment strategy that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by Community Reinvestment Department staff, and will not be subject to public comments. These changes will be fully documented and signed by the City Manager.

The City may choose to submit a copy of each amendment to the AAP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the City Manager.

b. Public Display and Comment Period

The draft Revised AAP will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by the Columbus City Council, and the anticipated submission date to HUD. Copies of the draft Revised AAP will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 420 10th Street, Columbus Consolidated Government Annex Building, 2nd Floor, Community Reinvestment Department
- 3111 Citizens Way, Columbus Consolidated Government, Citizen Services Center
- 3000 Macon Road, Columbus Public Library
- 640 Veterans Parkway, Mildred L. Terry Public Library
- 5689 Armour Road, North Columbus Public Library
- 2034 South Lumpkin Road, South Columbus Public Library

In addition, the City will make available a reasonable number of free copies to residents and groups that request them.

For projects subject to waivers or other program flexibilities related to pandemic response or other emergency situations, the Columbus Consolidated Government may provide a 5-day notice/comment period for proposed amendments necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to emergency conditions.

c. Comments Received on the Draft Revised Annual Action Plan

Written comments will be accepted by the City Contact Person, or a designee, during the 30- day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at public hearings, in preparing the final Revised AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised AAP for submission to HUD.

d. City Council Action

Following the public hearing, the Revised AAP will be presented to City Council for consideration and formal action.

e. Submission to HUD

The Revised CP will be submitted to HUD within 30 calendar days following the end of the public display and comment period.

Plan Access

The HUD-approved Revised CP will be kept on file at the Community Reinvestment Department office located in the Government Annex Building at 420 Tenth Street, Columbus. The plan can also be accessed online at:

<http://www.columbusga.org/CommunityReinvestment/>

Hard copies can be made available to those requesting the HUD-approved Revised AAP by contacting the City Contact Person, or a designee.

G. Consolidated Annual Performance and Evaluation Report (CAPER)

Report Development

The City shall follow the following procedure in the drafting and adoption of its Consolidated Annual Performance and Evaluation Report (CAPER).

a. Report Considerations

The Community Reinvestment Department staff will evaluate and report the accomplishments and expenditures of the previous program year for CDBG and HOME, and draft the CAPER in accordance with HUD requirements.

b. Public Display and Comment Period

The draft CAPER will be placed on display for a period of no less than 15 days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CAPER, a summary of program expenditures, a summary of program performance, the dates of the public display and comment period, the locations where copies of the draft CAPER can be examined, how comments will be accepted, and the anticipated submission date to HUD. Copies of the draft CAPER will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 420 10th Street, Columbus Consolidated Government Annex Building, 2nd Floor, Community Reinvestment Department
- 3111 Citizens Way, Columbus Consolidated Government, Citizen Services Center
- 3000 Macon Road, Columbus Public Library
- 640 Veterans Parkway, Mildred L. Terry Public Library
- 5689 Armour Road, North Columbus Public Library
- 2034 South Lumpkin Road, South Columbus Public Library

c. Comments Received on the Draft CAPER

Written comments will be accepted by the City Contact Person, or a designee, during the 15- day public display and comment period. The City will consider any comments or views of City residents received in writing in preparing the final CAPER. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CAPER for submission to City Council and to HUD.

d. Submission to HUD

The CAPER will be submitted to HUD no more than 90 days following the end of the City's annual program year.

H. Section 108 Loan Guarantee Program

Development of Section 108 Loan Guarantee Application

Applications for assistance filed by the City for Section 108 Loan Guarantee assistance authorized under HUD regulation 24 CFR Part 570, Subpart M, are subject to all provisions set forth within this Citizen Participation Plan. Such applications for Section 108 assistance may be included as part of the Consolidated Planning process or may be undertaken separately anytime during the City's program year.

Before the City submits an application for Section 108 loan guarantee assistance, the City will make available to citizens, public agencies and other interested parties information that includes the amount of assistance the City expects to be made available (including program income), the range of activities that may be undertaken, the estimated amount that will benefit persons of low- and moderate-income, and any activities likely to result in displacement.

Public Display and Comment Period

The City will publish its proposed Section 108 loan application for review and comment. The public notice shall include a summary describing the contents and purpose of the application and listing the locations where the entire application may be examined. An application for Section 108 Loan Guarantee funding shall be made available for public review for a 30-day period prior to consideration and

submission to HUD, and may be done concurrently with the public review and comment process for the five-year Consolidated Plan. Copies of the proposed Section 108 loan application will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 420 10th Street, Columbus Consolidated Government Annex Building, 2nd Floor, Community Reinvestment Department
- 3111 Citizens Way, Columbus Consolidated Government, Citizen Services Center
- 3000 Macon Road, Columbus Public Library
- 640 Veterans Parkway, Mildred L. Terry Public Library
- 5689 Armour Road, North Columbus Public Library
- 2034 South Lumpkin Road, South Columbus Public Library

Comments Received on the Proposed Section 108 Application

Written comments will be accepted by the City Contact Person, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing in preparing the final application. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final application for submission to HUD.

Submission to HUD

The Section 108 Loan Application will be submitted to HUD.

I. Complaints

Residents may register complaints regarding any aspect of the Community Development Block Grant (CDBG) or HOME Investment Partnerships (HOME) programs by contacting the City Contact Person, or a designee. All written complaints received will be addressed in writing within 15 days.

Residents wishing to object to HUD approval of the final CP may send written objections to the HUD Area Office at Five Points Plaza Building, 40 Marietta Street, Atlanta, GA 30303. Objections should be made within 30 calendar days after the City has submitted the CP to HUD. Any objections made will only be submitted to HUD for the following reasons:

- The applicant's description of needs and objectives is plainly inconsistent with available facts and data
- The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant
- The application does not comply with the requirements of the Community Development Block Grant and/or HOME programs or other applicable laws
- The application proposed activities which are otherwise ineligible under the program regulations.

Objections shall include both an identification of requirements not met and available facts and data.