



PUBLIC PARTICIPATION PLAN

CITY OF CASA GRANDE, ARIZONA

City of Casa Grande

Adopted: Resolution # 4904, March 2, 2015

City of Casa Grande

PUBLIC PARTICIPATION PLAN (PPP), 2015-2020

Overview

The City of Casa Grande (the City) is in the process of completing the Housing and Urban Development (HUD) Regulations 24 CFR Part 91.105 for a Community Development Block Grant (CDBG) Entitlement community. The fiscal year will begin on July 1, 2015. Part of the requirement as a CDBG entitlement city is to adopt a Public Participation Plan (PPP). The PPP will serve as the jurisdiction's policies and procedures for public participation.

HUD's CDBG program, covered by the City's PPP, seeks to improve communities by assisting with decent housing, suitable living environments, and increasing economic opportunities.

Purpose of the Public Participation Plan

The primary purpose of the City of Casa Grande's Public Participation Plan (PPP) is to encourage the citizens of the city to get involved in the process. Additionally, the purpose of the PPP is to obtain a meaningful assessment of the needs of the community during the development, implementation, performance assessment, and amendments to the Consolidated Plan, including the annual allocation process of grant fund (CDBG). Consultation and comments are from members of the public and private organizations (service providers), persons with low to moderate income, the elderly, and persons with disabilities in which the grantee proposes to use CDBG funds.

The Public Participation Goals for the City of Casa Grande

The goals identified below addresses HUD's requirements for CDBG fund users as follows:

1. Create a Five-year Consolidated Plan and Annual Action Plan involving service providers and the public.
2. Assess the needs of the community that can benefit from the use of the CDBG funds.
3. Provide various opportunities for the public to express preferences about the proposed activities.
4. Identify the needs of non-English speaking residents and ways in which the needs can be met.
5. Establish a process to address written grievances and complaints in a timely manner.
6. Provide technical assistance to groups, which represent and provide services to low-and moderate-income persons requesting assistance in developing proposals.
7. Communicate to the public that the federally funded project will conform with the Uniform Relocation Act.

Advertising the Public Participation Plan

The Public Participation Plan will be available on the City's website for quick and easy access and reference by the public, the agencies and nonprofit organizations that apply for funding. Hard copy of the PPP is available for public review during regular business hours, Monday through Friday, from 8 a.m. to 5:00 p.m., at the Planning and Development Department of the City.

Geographic Areas and Programs

The geographic area for the CDBG Entitlement community is within the City of Casa Grande city limits.

The City of Casa Grande is responsible for the development and implementation of this Public Participation Plan. Specifically, the Office of the Community Development Program administers the CDBG Program of the City.

The City's Community Development Program administers the City's Owner-Occupied Housing Rehabilitation (OOHR) program. The OOHR program is funded with CDBG, State Housing Funds- HOME, and Program Income. The City of Casa Grande's Housing Program was established in the late 1970s following the enactment of the Federal's CDBG Program.

Exhibit 1 below represents the estimated HUD funding available to the City of Casa Grande under this CDBG entitlement

Exhibit 1. Average Annual HUD Community Development Block Grant Funding

Source: HUD, San Francisco Office.

	CDBG
Direct Allocation	\$360,000
Program Income	\$60,000
Other-specified	\$0

The City is also eligible to apply and compete with other local jurisdictions for the State Housing Funds- HOME with the Arizona Department of Housing (ADOH).

Public Involvement- Consolidated Plan, Action Plan, AI and CAPER

The City formulates a 5-Year Consolidated Plan, Annual Action Plan, Analysis of Impediments to Fair Housing and CAPER. As the five (5) year plan approaches the end of its term, a new public involvement process starts with a series of consultations with focus groups and the public in general. The focus groups are comprised of members of the public and private agencies and stakeholder organizations that provide housing, health and social service, and community development activities. The public is invited to attend the neighborhood public hearing meetings. Appendix A is a list of focus groups 1.

The PPP starts with the Stakeholders' Kick Off meeting, five (5) months prior to the Council's review and approval of the Consolidated Plan. The City will mail out invitations to members of the stakeholders (focus groups) at least three (3) weeks prior to the Kick Off meeting. An e-mail will follow the invitation letter to the stakeholders as a reminder of the meeting with the time, date, and location. Those interested in attending will have input into the identification of community needs and setting of priorities. The three (3) focus groups meetings follow the Kick Off meeting to continue with the needs and priorities-gathering.

After the three (3) focus group consultations and the two (2) public meetings, a summary of all comments will be included in the plan for city council to consider.

Public Hearings – Consolidated Plan and Action Plan

The City will conduct at least two public hearings per year to obtain the public views and comments of residents, service providers, government agencies, and other stakeholders

regarding the HUD-funded program. The hearings will generally address housing, social, and community development needs (including infrastructure), and proposed activities. One of these hearings will be held prior to the adoption of the proposed 5-Year Consolidated Plan or Annual Action Plan. The second public hearing is usually conducted in conjunction with the preparation of the Consolidated Annual Performance Evaluation Report (CAPER).

All public hearing notices include, but are not limited, to the following:

- A display ad published in the local newspaper of record for general circulation at least 15 calendar days in advance of the hearing or at the beginning of the official public comment period, whichever occurs first;
- Notices posted at three public places (City Hall, Public Library, Police Department);
- Posting on the City website at www.casagrandeaz.gov.

Each notice for public hearing will clearly state the date, time, place, and purpose(s) of the hearing or meeting. In areas where the City has determined there are special needs to assist the public in reading or attending the meetings, the City will provide an interpreter with advance notice of at least 72 hours to the City. If the City determines that there is a substantial non-English-speaking population within its jurisdiction, the hearing or meeting notice will be published in both English and the appropriate other language.

Additional means of advertising can be used, as appropriate, including, but not limited to: mailing flyers included within the City's utility bill; distributing or posting notices at libraries, parks, and other public areas; developing press releases; publishing the notice in the public access local Channel 11; and sending notices to community organizations.

Public Comments

The following schedule shows the minimum number of days for noticing the public to allow the citizens to respond and comment:

- Consolidated Plan – 30 days
- Annual Action Plan – 30 days
- Amendment to the Annual Action Plan/Consolidated Plan – 30 days
- Amendment to the Public Participation Plan – 30 days
- Analysis of Impediments for Fair Housing Choice – 30 days
- Annual Performance and Evaluation Report (CAPER) – 15 days

The required display style notice will be placed in the local newspaper. The notice identifies the report/plan/amendment, when and where it will be available for public review, how to submit comments, and the deadline to submit comments. When requested, the City will take reasonable steps to provide the report/plan/amendment in other forms accessible to person with disabilities. The City will consider the views of the citizens and service providers submitted in writing. All documents presented for public comment will include a summary of all comments received during the public comment period and a summary of comments not accepted and the reasons thereof.

Annual Action Planning and Allocation Processes

The Annual Action Plan describes the planning and fund allocation process associated with the activities that are considered for funding.

City of Casa Grande CDBG Entitlement Program

HUD executes an agreement with the City following approval of the City's new 5-Year Consolidated Plan and Annual Action Plan by HUD. The City creates a CDBG Program Guidelines (Guidelines) that outlines the process and procedures in the implementation of the CDBG Program, meeting all of HUD's requirements. Contents of the Guidelines are, but not limited to the following:

1. Funding announcement
2. Program Application
3. Contract Execution
4. Monitoring Process
5. Crosscutting requirements
 - Financial Management and Procurement
 - Environmental Review
 - Federal Labor Standards
 - Acquisition and Relocations
 - Fair Housing and Non-discrimination
6. Disbursement of Funds
7. Program Close-out

After the CDBG Program Guidelines are established, the City will have at least a two (2) year period to get the Program up and running before sub-recipients will be able to submit projects. At such time, the City will issue a Notice of Funding Availability (NOFA) to all participating CDBG partners within the city limits. The NOFA will be released in the fall. Any priorities establish by the City will become part of the annual funding application document. Not less than 60 days before the deadline to submit applications for eligible activities (typically in December), the City shall place a public notice in the local newspaper regarding the availability of funds and the application process. The notice demonstrates when and where applications are available, the deadline for submitting applications, and whom to contact for more information. Applications are mailed to any person(s) or organizations public or private upon request, or provided in an electronic format.

Substantial Amendments

From time-to-time, it may be necessary for the City to process a "substantial amendment" to the 5-Year Consolidated Plan or an Annual Action Plan to allow for new CDBG funded activities, modification of existing activities, or other program administrative actions.

Any proposed amendment that is considered a "substantial amendment" is subject to the public participation process, requires formal action by the City Council and approval by HUD. A 30-day public notice shall be published to provide the opportunity for the public to review and comment on the proposed substantial amendments. The City will consider all comments or views received from the public concerning proposed substantial amendments in accordance with 24 CFR 91.105 (c)(3). A summary of these comments and views, including comments or views not accepted, and the reason why, shall be attached to the substantial amendment.

The City is required by HUD [24 CFR 91.505 (b)] to identify the criteria to be used in determining if a proposed action will be considered a *substantial amendment*. The City identifies a *substantial amendment* by the following criteria:

1. A new activity not previously listed and described in the Consolidated Plan/Annual Action Plan;
2. When a proposal is made to amend the description of an existing activity in such a way that the newly described purpose, scope, location, or beneficiaries differ significantly from the original activity's purpose, scope, location, or beneficiaries; or
3. An increase for funds allocated to an existing activity when the following apply:
 - a. an increase in funding for a CDBG public service-type activity in an amount greater than \$50,000, or a 100 percent increase over the current funded amount, whichever is greater;
 - b. an increase in the funding for other activities (public facility improvements, code enforcement, acquisition, etc.) in an amount greater than \$100,000, or 100 percent increase over current funded amount, whichever is greater; or

NOTE: A matrix (Table B) at the end of this document summarizes these criteria.

4. The City will consider the reprogramming of unspent CDBG balances from completed and cancelled CDBG-funded activities to other eligible activities to use the CDBG funds efficiently. Activities below the stated thresholds may be cancelled for cause and funds reprogrammed without resulting in a substantial change. Examples of cause are:
 - a. Changes in the use of CDBG funds from one eligible activity to another (i.e., housing to economic development or public services to public facility); or
 - b. Adds or deletes an activity on the adopted list of priority needs; or
 - c. Cancellation requested by the sub-recipient; or
 - d. Determination by the Planning and Development Department that insufficient funding prevents accomplishment of the activity; or
 - e. Determination by the Planning and Development Department that the project cannot be carried out in a timely or eligible manner; or
 - f. Increases or decreases funds to a project/activity by more than 10% of the City's grant allocation. Adjustments in funding levels for public service, administration and housing activities due to differences in actual versus anticipated program income should not be considered substantial.

Minor amendments shall be made administratively and incorporated into the Consolidated Annual Performance Report (CAPER) at the end of each program year. A minor amendment is defined as one that maintains the integrity of the plan while providing flexibility in meeting the state goals and objectives.

Substantial amendments shall be made available for public review as outlined in the Public Comment section of this PPP. Minor amendments to the plan that comply with minimum HUD requirements shall be incorporated administratively.

In the event that any of administrative reprogramming actions are above the threshold limits, and come under the "substantial amendment" criteria, the proposed actions are subject to any public participation processes, will require formal action by the City Council, and notification to HUD.

Substantial amendments will be considered twice in each program year. These changes will be made in the spring and fall.

In the event of a declared emergency, it may be necessary to reprogram funds to meet urgent community needs. In these situations, requirements related to public notice and public comment period may be suspended.

Amendment to Public Participation Plan

During the administration of the HUD programs, it may become necessary to amend the PPP. Any proposed amendment to the PPP requires a 30-day public notice, formal action by the City Council, as appropriate, and be approved by HUD.

Access to Information

The City shall provide opportunities for residents, public agencies, and other interested parties, including those most affected, with reasonable and timely access to information and records relating to the City's Consolidated Plan, as well as the proposed, actual, and past use of funds covered by this PPP.

Standard documents will be available for public review at the Planning and Development Department, City of Casa Grande, 510 E. Florence Blvd., Casa Grande, AZ, and the web site www.casagrandeaz.gov. Upon request, these materials will also be available in a form accessible to persons with disabilities. A reasonable number of free copies of the PPP, and other standard documentation, will be provided to the public and groups at their request; additional copies may be obtained on a first come, first serve basis from the Planning and Development Department in accordance with Department's fee policy for copies. Direct comments, questions, or suggested amendments to Community Development Program Manager, at 520-421-8630 ext. 3030 or via e-mail at ldemaree@casagrandeaz.gov.

Standard program documents that shall be made accessible for public review and comment throughout the preparation process include the proposed and final Consolidated Plan, Annual Action Plan, CAPER, Substantial Amendments, and this Public Participation Plan.

It is the City's policy to maintain and provide access to all applicable and appropriate records pertaining to the administration of the CDBG or any eligible HUD programs. Records retention will adhere to all HUD requirements. Accordingly, the City will at a minimum, maintain and provide access to documentation and records for a period of five (5) years.

Relocation

The City's policy is to administer the Community Development Block Grant program without displacement. In the event displacement is unavoidable, the City and/or other responsible party(s) will comply with the regulations of the Uniform Relocation Assistance and Real Property Acquisition Policies Act, as amended, and Section 104(d) of the Housing and Community Development Act of 1974, as amended.

Consistent with the goals and objectives of activities assisted under the Act, the City of Casa Grande will take appropriate steps to minimize the direct and indirect displacement of persons from their homes.

Performance Reports

Each fiscal year the City is required to prepare and submit a performance report to HUD for the previous program year. The information compiled in this document is necessary to assess the progress on funding received by the entity, participating jurisdictions, sub-recipients, and other agencies or organizations. Data collected in the compilation of the performance report will be used to supply information to HUD and the public on the accomplishments and services provided. The information will include the number of people served, ethnicity, income category, objective and outcome, and type of service received, as well as the current status on housing, public facilities and improvements, and other projects. The information is also used to determine future funding considerations.

The City will conduct the second required Public Hearing before its City Council to review the CAPER. The final CAPER performance report will be available to the public for review and comment at least 15 days prior to submission to HUD. The Public Hearing will be advertised in the newspaper of general circulation at least 15 days in advance of the hearing and/or at the beginning of the official public comment period, whichever occurs first, so that the public will be provided reasonable notice to review and present comments on performance reports. A copy of the CAPER will be available at the Planning and Development Department for review and will be located on the City's website www.casagrandeaz.gov. The CAPER shall be submitted to HUD within 90 days after the end of the program year (no later than the month of September). Final reporting documents will also be available to any interested parties upon request.

Technical Assistance

Technical assistance is available as necessary to groups and organizations representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under the Consolidated Plan.

The City will make technical assistance available to sub-recipients and potential proponents through the Community Development Program. The Community Development Program is the main source of information of the CDBG HUD program and application process. Staff provides assistance at community meetings and during proposal preparation, evaluation, review, and monitoring. If Staff sees a need, they can implement a mandatory proposal and sub-recipient training, to provide background and understanding of the programs and processes.

Complaints and Grievances

Residents or other interested parties may submit complaints regarding the administration of HUD-funded programs to the City. Complaints need to be in writing and mailed to the City of Casa Grande, Attn: Director, Planning and Development Department, 510 E. Florence Blvd. Casa Grande, AZ 85122. The Planning and Development Department will receive, log-in, and file all written complaints and grievances. The complainant should state the nature of the complaint, what prior efforts were made to resolve the problem, and any other pertinent information to assist the City resolving the issues. All complaints will receive careful consideration and a response will be provided to the complainant within 15 working days.

Monitoring and Evaluation

In accordance with HUD program regulations, Planning and Development Department continually monitors all HUD-funded sub-recipients and their activities. The City Program Monitoring Policies were developed to ensure compliance with 24 CFR 570.502 (CDBG) and 24 CFR Part 85.40 (a) which provides for the general program monitoring responsibilities of the City in the administration of the HUD-funded programs.

Grantees are responsible for managing the day-to-day operations of grant and sub-grant supported activities. In order to assure compliance with applicable Federal requirements and that the grantee is achieving their performance goals, grantees must monitor grant and sub-grant supported activities. Grantee monitoring must cover each program, function, or activity.

Definitions

Annual Action Plan: This document updates the Consolidated Plan on an annual basis and allocates one year's funding (entitlement and program income) to specific projects and activities for the CDBG program.

CAPER (Consolidated Annual Performance Evaluation Report): This document reports on the progress made in carrying out the Consolidated Plan and Annual Action Plan. The Planning and Development Department prepares the report annually in accordance with 24 CFR Part 91.

Planning and Development Department: The City's Department responsible for administration particularly of the CDBG programs, as well as any other HUD programs the City qualifies for in the future.

CDBG (Community Development Block Grant): A HUD grant that provides for a variety of community development programs that benefit low- and moderate-income persons.

PPP (Public Participation Plan): The City's PPP sets forth the City policies and procedures for public participation for the use of CDBG, HOME Investment Partnership Act (HOME), and other HUD grants and funding programs. The PPP provides an opportunity for the community to work to identify needs and to allocate CDBG, HOME and other funds.

CBO (Community Based Organization): A public or private nonprofit organization of demonstrated effectiveness that is representative of a community or significant segments of a community; and which provides social, educational, or related services to individuals in the community.

Consolidated Plan: This document is submitted to HUD and serves as the planning document of the jurisdiction and application for funding CDBG and HOME. The document is developed in accordance with 24 CFR Part 91 and sets forth the priorities and strategies of the programs for a five-year period.

HOME (Home Investment Partnership Programs): A HUD grants that provides funding to expand the supply of decent and affordable housing for low-income households. (Currently, the City is not entitled to HOME grants directly through HUD.)

HUD: The U.S. Department of Housing and Urban Development.

Low- and Moderate-Income Persons: An individual from a household with a total income that does not exceed 80 percent of the median household income for the area adjusted for family size. HUD calculates and publishes the income limits yearly.

Needs Identification Analyses: The examination of current housing and community needs, identifying strategies, priority needs, and objectives for meeting housing, community development, and economic development goals. It also provides a basis for prioritizing project proposals for CDBG and HOME funding consideration.

Program Monitoring Policies: The City has developed and implemented policies to monitor the use of funds and to measure the progress and effectiveness of grant programs. These policies are in accordance with HUD requirements.

Program Year: The twelve-month period in which HUD funds are to be spent for eligible activities; usually the period beginning July 1 and ending June 30.

Proponent: An entity that has or is considering submission of a proposal for the use of CDBG funds.

Public Meeting: Meetings in which the members of the public exchange their ideas on a particular issue and provide the sponsoring entity with their views on the subject at hand. Elected officials may attend Public Meetings but no formal actions are taken at these meetings.

Public Hearing: A formal opportunity for a governing body or other entity to receive public opinion on subjects that may require action. Notices of public hearings are advertised through various forms of media.

Relocation: The movement of a person as a direct result of the implementation of federally assisted acquisition, demolition, conversion, or rehabilitation activities.

Sub-recipient: A public or private nonprofit agency, authority or organization, or a for-profit entity receiving funds from the grantee or another sub-recipient to undertake activities eligible for assistance. The term does not include contractors providing supplies, equipment, construction, or services subject to the procurement requirements in 24 CFR 85.36 or in 24 CFR Part 84, as applicable.

Substantial Amendment: A substantial amendment is a change to the jurisdiction’s planned or actual activities as published in the Consolidated Plan or Annual Action Plan. The City has established and published in the Public Participation Plan thresholds to define what constitutes a substantial amendment.

TABLE A

CDBG Public Notice Summary				
Type of Document	Public Hearing	Hearing Notice	Public Comment Period	Notices in Public Areas

Consolidated Plan and/or Annual Action Plan	1-2	Run a display notice in newspapers at least 15 calendar days prior to <u>each</u> hearing or at the beginning of the public comment whichever is first	30-day public comment period ending upon Council approval of the item	Post notice listing all meetings/hearings for the planning/adoption phase with enough detail for the public to recognize the purposes of the meetings, draft document locations, and dates for comment periods
Substantial Amendments to Consolidated Plan and/or Annual Action Plan	2 (Spring & Fall depending on the need)	Run a display notice in newspapers at least 15 calendar days prior to <u>each</u> hearing or at the beginning of the public comment whichever is first	30-day public comment period ending upon Council approval of the item	Post notice describing amendment items and location of drafts for public review & comment
Annual Performance Report/CAPER	1	Run a display notice in newspapers at least 15 calendar days prior to the hearing or at the beginning of the public comment whichever is first	15-day public comment period ending upon Council approval of the item	Post notice identifying purpose of hearing, comment period, and location of drafts for public review and comment
<p>► Display ads will be published in the local newspaper in the area.</p> <p>► Documents and drafts for public comment will be available on the City Website, which will also provide updates to the process and links to other information.</p>				

TABLE B

SUMMARY OF SUBSTANTIAL AMENDMENT CRITERIA				
1) An activity not previously listed or described in the Consolidated Plan or Annual Action Plan				
2) Amending an existing activity so that the new purpose, scope, location ,or beneficiaries differ significantly from the original activity				
3) For a funding change or cancellation to an existing CDBG public service activity	The greater of:	An increase of more than \$50,000	or	A 100% increase over current funding
4) For a funding change or cancellation of an existing CDBG activity such as code enforcement, public facilities improvements	The greater of:	An increase of more than \$100,000	or	A 100% increase over current funding