



# CDBG Citizen Participation Policy

Department of Health and Human Services

CDBG Program

2017

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**(A) Introduction**

- 1) St. Tammany Parish receives Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). St. Tammany Parish has a goal of involving citizens in the planning for the use of CDBG funds. HUD also requires the Parish, as an Entitlement community, to publish and adopt a Citizen Participation Plan that details the procedures and policies related to citizen participation.

**(B) Encouragement of Citizen Participation**

- 1) St. Tammany Parish encourages citizens to participate in the development of the Assessment of Fair Housing (AFH), the development of the Consolidated Plan, any substantial amendments to the Consolidated Plan, and the annual performance report (CAPER).
- 2) St. Tammany Parish especially encourages participation by low- and moderate-income persons as defined by HUD guidelines, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods.

***Who are residents of predominantly low- and moderate-income neighborhoods in St. Tammany?***

People who live in continuous areas bound by roads or natural features (rivers, 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.

- 3) St. Tammany Parish also encourages participation by all of its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.
- 4) St. Tammany Parish encourages the participation of residents of public and assisted housing developments, in conjunction with public housing authorities, in the process of developing and implementing the AFH, the Consolidated Plan and Annual Plans, along with other low income residents of targeted revitalization areas in which the developments are located.
- 5) St. Tammany Parish shall make an effort to provide information to the housing agency about AFH, Consolidated Plan, and Annual Plan activities related to its developments and surrounding communities so that the housing agency can make this information available at their annual public hearing.
- 6) St. Tammany Parish shall make an effort to encourage the participation of local and regional institutions, Continuums of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in the process of developing and implementing the AFH and the Consolidated Plan. This effort shall also include broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies in the process of developing the Consolidated Plan.

**(C) Citizen Comment on the Citizen Participation Plan and Amendments**

- 1) St. Tammany Parish will provide citizens with a reasonable opportunity to comment on the original Citizen Participation Plan and on amendments to the Citizen Participation Plan.
- 2) The St. Tammany Parish Citizen Participation Plan shall be made public by posting it on the Health and Human Services section of the Parish website and by distributing copies at Public Hearings.
- 3) The Citizen Participation Plan will be available in a format accessible to persons with disabilities, upon request.

***Citizens wishing to request an accessible copy of the Citizen Participation Plan should contact the St. Tammany Parish Department of Health and Human Services at 985-898-3074.***

**(D) Development of the Assessment of Fair Housing (AFH)**

- 1) Prior to adoption of the AFH, St. Tammany Parish will:
  - a) Make available to citizens, public agencies, and other interested parties all HUD-provided data and any other supplemental information that will be incorporated into the AFH.
  - b) Publish the proposed AFH in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments by:
    - i) Publishing a notification of the Parish's intent to submit the proposed AFH in at least one newspaper of general circulation or the paper of record for the Parish.
    - ii) The notification must describe the contents and purpose of the AFH, and must include a list of the locations where copies of the entire proposed AFH may be examined.
  - c) Free copies of the AFH will be provided to citizens and groups that request it by
    - i) Making copies of the proposed AFH available at government offices.
    - ii) Posting a copy on the St. Tammany Parish website.

HUD-provided data will be available through HUD's website and the St. Tammany Parish website. Any other supplemental information used in developing the AFH will also be available on the St. Tammany Parish website.

- 2) St. Tammany Parish will hold at least one public hearing during the development of the AFH.

**(E) Development of the Consolidated Plan and Subsequent Annual Plans**

- 1) Prior to adoption of the Consolidated Plan, St. Tammany Parish will make available to citizens, public agencies, and other interested parties information that includes:
  - a) The amount of assistance the Parish expects to receive (including grant funds and program income)
  - b) The range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income.
- 2) St. Tammany Parish plans to minimize displacement of persons and to assist any persons displaced.

***Details regarding the types and levels of assistance the Parish will make available to persons displaced are provided in the St. Tammany Parish Anti-Displacement and Relocation Plan.***

- 3) St. Tammany Parish will publish the proposed Consolidated Plan in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments by:
  - a) Publishing a notification of the Parish's intent to submit the proposed Consolidated Plan or Annual Plan in at least one newspaper of general circulation or the paper of record for the Parish.
    - i) The notification must describe the contents and purpose of the Consolidated Plan or Annual Plan, and must include a list of the locations where copies of the entire proposed Consolidated Plan or Annual Plan may be examined.
  - b) Free copies of the AFH will be provided to citizens and groups that request it by
    - i) Making copies of the proposed AFH available at government offices.
    - ii) Posting a copy on the St. Tammany Parish website.
- 4) St. Tammany Parish will accept comments on the Consolidated Plan from citizens for a period of at least 30 days prior to submittal to HUD.
- 5) St. Tammany Parish will consider any comments or views of citizens received in writing, or orally at a public hearing, in preparing the final Consolidated Plan or Annual Plan.

***A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final Consolidated Plan.***

- 6) St. Tammany Parish will hold at least one public hearing during the development of the Consolidated Plan.

## **(F) Amendments**

- 1) Substantial Amendments to the Consolidated Plan will be required when:
  - a) Budget changes in a proposed activity in the amount of, or exceeding, 2.5% of the annual allocation.
  - b) Projects are added or deleted from the Plan.
- 2) When a Substantial Amendment is proposed:
  - a) St. Tammany Parish will provide citizens with reasonable notice (at least 30 days) prior to implementation of the amendment;
  - b) Notice of proposed Substantial Amendment will be published in at least one newspaper of general circulation;
  - c) St. Tammany Parish will consider any comments or views of citizens received in writing, or orally at public hearings, if any, in preparing the substantial amendment of the Consolidated Plan;
  - d) A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the substantial amendment of the Consolidated Plan
- 3) Revisions to the AFH are required when (24 CFR 5.164):
  - a) A large-scale change in circumstances, also called a material change, such as a declared disaster, that significantly impacts the Parish's demographics, housing efforts and availability.
  - b) As notified in writing by HUD.
- 4) When a revision to the AFH is required:
  - a) St. Tammany Parish will prepare amended analyses, assessments, priorities and goals that take into account the material change.
  - b) St. Tammany Parish will follow the community notice and comment process applicable to a proposed Substantial Amendment.

**(G) Annual Performance Reports (CAPER)**

- 1) Citizens will be provided with reasonable notice and an opportunity to comment on annual performance reports.
  - a) St. Tammany Parish will accept public comments on performance reports for a period of at least 15 days prior to submission to HUD.
  - b) A notice will be published in at least one newspaper of general circulation or the paper of record for the Parish, informing the public of the comment period
- 2) St. Tammany Parish will consider any comments or views of citizens received in writing, or orally at public hearings, in preparing the performance report. A summary of these comments or views shall be attached to the performance report.

**(H) Public Hearings**

- 1) St. Tammany Parish will hold at least two public hearings per year to obtain citizens' views and to respond to proposals and questions.
- 2) Public hearings will be conducted at a minimum of two different stages of the program year.
- 3) Hearings will address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH, and review of program performance.

***The main goal of Public Hearings is to obtain the views of citizens on housing and community development needs, including priority non-housing community and community development needs.***

- 4) St. Tammany Parish will publish a notice in a newspaper of general circulation at least two weeks prior to the hearing date.
- 5) Information regarding Public Hearings will also be available on the Parish Website at [www.stpgov.org](http://www.stpgov.org).
- 6) Hearings will be held at times and locations convenient to potential and actual beneficiaries:
  - a) After working hours when possible.
  - b) At locations accessible by St. Tammany Parish's transportation provider.
- 7) St. Tammany Parish will accommodate persons with disabilities and non-English speaking residents in every way possible.

***Individuals who may need assistance are encouraged to call the Department of Health and Human Services at (985) 898-3074 at least three days prior to the Public Hearing to report needs so that they may be accommodated.***

**(I) Citizen Rights**

1) Availability to the Public

- a) The AFH, Consolidated Plan and Annual Plan as adopted, Substantial Amendments, and the Consolidated Annual Performance Evaluation Report will be available to the public on the Parish Website at [www.stpgov.org/cdbg](http://www.stpgov.org/cdbg).

***Residents without internet access are encouraged to use the free internet at their local public library to access these documents.***

- b) Citizens with disabilities and others who cannot access these documents online should contact the Department of Health and Human Services at (985) 898-3074 to request copies in an accessible format.

2) Access to Records

- a) St. Tammany Parish will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating the Consolidated Plan and the use of assistance under CDBG programs during the preceding five years.
- b) Interested citizens should contact the Department of Health and Human Services at (985) 898-3074 or [healthhumanservices@stpgov.org](mailto:healthhumanservices@stpgov.org) to request access to records.

3) Technical assistance

- a) The citizen participation plan must provide for technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any of the programs covered by the consolidated plan, with the level and type of assistance determined by the jurisdiction. The assistance need not include the provision of funds to the groups.

4) Complaints

- a) St. Tammany Parish will accept and respond to complaints from citizens related to the Consolidated Plan, Annual Plans, Substantial Amendments, and performance reports.
- b) Citizens wishing to submit written complaints are encouraged to use the attached complaint form. Complaints will also be received by e-mail to [healthhumanservices@stpgov.org](mailto:healthhumanservices@stpgov.org).



- c) St. Tammany Parish will provide a timely, substantive written response to every written citizen complaint, within 15 working days, where possible.

**(J) Jurisdiction Responsibility**

The requirements for citizen participation do not restrict the responsibility or authority of St. Tammany Parish for the development and execution of its consolidated plan.

**QUESTIONS REGARDING THE CITIZEN PARTICIPATION PLAN SHOULD BE DIRECTED TO:**

**St. Tammany Parish Government**  
**Department of Health & Human Services**  
**Attn: CDBG Staff**  
**P.O. Box 628**  
**Covington, LA 70434**  
**(985) 898-3074**  
[healthhumanservices@stpgov.org](mailto:healthhumanservices@stpgov.org)

**PARISH OF ST. TAMMANY**  
**CITIZEN COMPLAINT PROCEDURES**

**(K) Complaint Procedures**

The Parish of St. Tammany shall maintain a written citizen and administrative complaint procedure. All written citizen complaints which identify deficiencies relative to the implementation of the Parish of St. Tammany's Consolidated Plan will merit careful and prompt consideration, and will be handled according to the procedures set forth herein. Questions and comments should be directed to Department of Health and Human Services, P. O. Box 628, Covington, Louisiana 70434, or call 985-898-3074, or via E-Mail: healthhumanservices@stpgov.org.

- 1) Any individual who wishes to object to any aspect of the Consolidated Plan, the Annual use of Funds Report, and/or any other required report may file an official complaint on the forms furnished by the Director of Health and Human Services, for the Parish of St. Tammany.
- 2) Within three (3) days of the date on which the complaint is received by the Department of Health and Human Services, the Director shall forward the complaint along with his/her comments, to the Mayor (see Exhibit A, "Citizen Complaint Form").
- 3) A copy of the written complaint shall be forwarded to the U.S. Department of Housing and Urban Development, 500 Poydras Street, New Orleans, Louisiana 70130, within three (3) days of the date on which the complaint is filed with the Department of the Health and Human Services, for the Parish of St. Tammany.
- 4) All good faith attempts will be made to satisfactorily resolve any complaints at the local level.
- 5) A written response from the Parish of St. Tammany to the complaint will be made within fifteen (15) days, where practical, from the date on which the complaint is filed with the Director of Health and Human Services, for the Parish of St. Tammany.
- 6) A copy of the response from the Parish of St. Tammany, and any other correspondence relating to the same, shall be forwarded to the U.S. Department of Housing and Urban Development, 500 Poydras Street, New Orleans, Louisiana 70130.
- 7) The complainant shall be made aware that, if he or she is not satisfied with the response, a written complaint may be filed with the U.S. Department of Housing and Urban Development, 500 Poydras Street, New Orleans, Louisiana 70130.
- 8) Persons wishing to object to the approval of the Consolidated Plan, substantial amendments, and/or an Annual Action Plan, filed by the Parish of St. Tammany may make such objection known to the U.S. Department of Housing and Urban Development. The U.S. Department of Housing and Urban Development will consider objections made only on the following grounds:

i. The Parish's description of needs and objectives are plainly inconsistent with the available facts and data;

ii. The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the Parish, and;

iii. The Consolidated Plan, substantial amendments, and/or Annual Action Plan do not comply with the requirements set forth in the Final Statement or other applicable laws and regulations.

**a) Objections.**

Such objections should include both an identification of the requirements not met and, in the case of objections relative to sub-paragraph (i) above, the complainant must supply the data upon which he or she relied to support the objection.

**EXHIBIT A**

**PARISH OF ST. TAMMANY  
CITIZEN COMPLAINT FORM**

DATE:

NAME:

ADDRESS:

PHONE:

NATURE OF COMPLAINT:

ACTION REQUESTED:

X \_\_\_\_\_

Signature of Complainant