

**City of Columbia
FY 2020-2024 Consolidated Plan
Citizen Participation Plan**

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1. PURPOSE

Participating Jurisdictions (PJs) receiving U.S. Department of Housing and Urban Development (HUD) entitlement grant funds must develop a Citizen Participation Plan (CPP) in accordance with Title 24 CFR 91.105 of the Housing and Community Development Act of 1974, as amended. The CPP describes efforts undertaken to encourage citizen participation in the development of the City of Columbia's federal reports: 5-year Consolidated Plan, the annual Action Plan, and the Consolidated Annual Performance and Evaluation Report (CAPER).

The CPP is designed to encourage the participation of City residents in the development of the federal reports listed above, particularly low to moderate income residents. The CPP also encourages local and regional institutions and other organizations (including businesses, developers, and community and faith-based organizations) to participate in developing and implementing the 5-year Consolidated Plan and related reports. The City shall take appropriate actions to encourage the participation of persons of minority backgrounds, persons with limited-English proficiency, and persons with disabilities. The City shall also encourage participation from residents of public and assisted housing facilities in the development and implementation of the consolidated plan.

The City of Columbia is committed to compliance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973, as amended. Reasonable modifications and equal access to communications will be provided upon request. The City of Columbia does not discriminate on the basis of disability in the admission or access to, or treatment or employment in, its programs and activities.

The CPP applies to five areas of planning for the use of affordable housing, community and economic development made possible through HUD funding:

- A. The 5-year Consolidated Plan;
- B. The Annual Action Plan;
- C. The Consolidated Annual Performance and Evaluation Report (CAPER);
- D. Substantial amendments to a 5-Year Consolidated Plan and/or annual Action Plan; and
- E. Amendments to the Citizen Participation Plan.

The City of Columbia's CDBG and HOME program/fiscal year begins January 1 and ends December 31st. In order to receive entitlement grant funding, the U. S. Department of Housing and Urban Development (HUD) requires jurisdictions to submit a Consolidated Plan every five years. This plan is a comprehensive strategic plan for community planning and development activities. The annual Action Plan serves as the City's application for these HUD grant programs. Federal law also requires citizens have opportunities to review and comment on the local jurisdiction's plans to allocate these funds.

The purpose of programs covered by this CPP is to improve the Columbia community by providing: decent housing, a suitable living environment, and economic opportunities for low and moderate income households.

This document outlines how members of the Columbia community may participate in the five planning areas previously listed (A-E). General requirements for all or most activities are described in detail in Section 5 of the Citizen Participation Plan (CPP).

2. HUD PROGRAMS

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

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

- B. **HOME Investment Partnerships Program (HOME):** HOME was introduced in the Cranston-Gonzalez National Affordable Housing Act of 1990 and provides funding for housing rehabilitation, new housing construction, acquisition of affordable housing, and tenant-based rental assistance. A portion of the funds (15 percent) must be set aside for community housing development organizations (CHDOs) certified by the City of Columbia.

3. LEAD AGENCY

The Community Development Department (CDD) is designated by the Columbia City Council as the lead agency for the administration of the CDBG and HOME grant programs. Through the U.S. Department of Housing and Urban Development (HUD) the CD Department administers the CDBG and HOME programs. As the lead agency for HUD, the CD department is responsible for developing the 5-Year Consolidated, Annual Action Plans, and the Consolidated Annual Performance and Evaluation Report (CAPER).

The CD Department coordinates with the Columbia Housing Authority, other City Departments and local service providers to develop these documents.

4. PLANNING ACTIVITIES SUBJECT TO CITIZEN PARTICIPATION PLAN

- A. **THE FIVE-YEAR CONSOLIDATED PLAN.** The City of Columbia's 5-year Consolidated Plan is developed through a collaborative process whereby the community

identifies needs, goals and funding priorities for Columbia's affordable housing, and community and economic development activities.

Citizen participation is an essential component in developing the 5-Year Consolidated Plan; amending the plan and reporting on program performance. Focus groups, public hearings, community meetings, citizen surveys and opportunities to provide written comment are all a part of the strategy to obtain citizen input. The City will make special efforts to solicit the views of low to moderate income citizens, and to encourage the participation of all citizens including minorities, the non-English speaking population, and persons with disabilities. Actions for public participation in the 5-Year Consolidated Plan are as follows:

- i. **Analysis of Impediments to Fair Housing Choice:** The Fair Housing Task Force report will include most current HUD regulatory requirements for Affirmatively Furthering Fair Housing. At the time of this writing, HUD Field Office staff have directed City staff to proceed with conducting an Analysis of Impediments to Fair Housing Choice due to the delay in implementation of conducting the new Assessment of Fair Housing Tool referenced in HUD's Final Rule on Affirmatively Furthering Fair Housing. City staff is working with the Fair Housing Task Force to complete a more robust process in accordance with the new rule, in the event a change in policy occurs, and will be providing a report of Council consideration in April of 2019.
- ii. **Fair Housing Task Force:** CD Department staff will work with the City's Fair Housing Task Force (FHTF) to develop a report to meet HUD requirements for Affirmatively Furthering Fair Housing. Fair Housing Task Force meeting and dates and topics are as seen below:

July 7, 2018: Kick-off Meeting: Introductions, review FHTF purpose and authorizing resolution, review Sunshine Law requirements. Review staff report on previous fair housing actions and demographic overview. Review fair housing survey draft.

August 27, 2018: Review maps containing data on segregation/integration and racially or ethnically concentrated areas of poverty. Presentation from Mayor Treece on Fair Housing.

September 24, 2018: Review and analyze maps on disparities in access to opportunity, and disproportionate housing needs.

October 22, 2018: Review staff report and Columbia Housing Authority CEO Presentation on publicly supported housing analysis. Presentation from Columbia Public Schools, Steve Godier, Home School Communicator regarding the impact of insecure housing and trauma on children.

November 26, 2018: Disability and Access Analysis and presentation from Wayne Crawford, Executive Director, Missouri Inclusive Housing Development. Presentation on homeless population needs and social service needs from Steve Hollis, Division of Human Services and Katie Wilkens, Homeless Veteran Program, Harry S. Truman Memorial Veterans Hospital.

November 29, 2018: Public Engagement Event: “Fostering Equitable and Inclusive Neighborhoods,” Tiffany Manuel. Small group discussions on improving equity and inclusivity in neighborhoods.

December 15, 2018: Review of data analyzed thus far and comprehensive affordable housing strategy subcommittee meeting.

Jan 28, 2019: Fair Housing Enforcement and counseling presentation from MU Law School Professor, Rigel Oliveri and Rose Wibbenmeyer of the City of Columbia Legal Department.

Feb 25, 2019: Formulating Fair Housing Goals and Priorities.

March 25, 2019: Consideration of Report and Recommended Goals and Priorities.

April 15, 2019: Council consideration of Fair Housing Task Force Report.

- iii. **Fair Housing Needs Survey, October through November 2018:** CD Department staff will work with the City’s Fair Housing Task Force (FHTF) to develop a Fair Housing Needs Survey. CD staff will work with the FHTF to distribute the survey and collect responses from a broad range of citizens reflective of all the City’s populations, including populations impacted by the issue of fair housing. Survey data will complement the broader data review, analysis and public engagement activities of the FHTF.
- iv. **Community Development Needs Survey, January through May 2019:** CD Department staff will coordinate the development of a survey detailing community needs and funding priorities for the City of Columbia. Staff will coordinate with the Community Development Commission in developing the survey and obtaining survey data. Survey data and analysis will be used by staff in developing priority community development needs for the consolidated plan.
- v. **2020-2024 Consolidated Plan Focus Groups:** In developing the Consolidated Plan, the City will consult with other public and private agencies, both for-profit and non-profit entities providing or having direct impact on the broad range of housing, health, and social services needed by Columbia residents. The purpose of these meetings is to gather information and data on community development needs. The City will seek specific input to identify the needs of persons experiencing homelessness, persons living with HIV/AIDS and their families, persons with disabilities and other special populations. A list, dates and descriptions of the 8 focus group meetings are as follows:

Consolidated Plan Neighborhood Congress, January 9 2019: Educate the public on consolidated plan process, HUD funding, previous uses, and unutilized tools. Obtain public input on City of Columbia community development needs.

Affordable Housing Focus Group, January 24, 2019: Define and educate stakeholders on affordable housing needs (owner, renter, and homelessness) in the City of Columbia and obtain input from lenders, developers, builders, Realtors, housing providers, service providers and the general public.

Community Housing Development Organizations (CHDOs), January 30, 2019: Educate CHDOs on HUD requirements and gain input on how to most effectively utilize HOME CHDO funding.

Economic Development REDI Board, February 13, 2019: Explain and educate the public, business leaders and key stakeholders on eligible economic development uses of CDBG funds and requirements. Gain input from REDI BOARD s on economic development needs.

Neighborhood Infrastructure Focus Group, February 7, 2019: Define and educate the public and neighborhood groups/organizations on eligible and past uses of CDBG for public improvements. Obtain input on neighborhood and public improvement needs (streets, sewers, sidewalks, roads, parks).

Homelessness Engagement Meeting, February 19, 2019: Convene key stakeholders, community partners and the public to determine priorities needs and actions to support efforts to address homelessness.

- vi. **Utilize Quantitative and Qualitative Data on Community Needs.** City staff shall review relevant data and conduct necessary evaluation and analysis to help inform stakeholders on an accurate assessment of community needs and priorities on which the City should base strategic recommendations.
- vii. **Public Hearings.** HUD guidelines require citizen participation plans provide for at least one public hearing during the development of the consolidated plan in accordance with 24 CFR 91.105(b)(3). This citizen participation plan plans for 6 public hearings to obtain public input during the consolidated planning process. Public hearing topics will consist of the following:

Public Hearing 1, November 19, 2018: **City Council**, consideration of the Citizen Participation Plan.

Public Hearing 2, January 16, 2019: Housing and **Community Development Commission (HCDC)**, Community Development Needs.

Public Hearing 3, February 13, 2019: **HCDC**, public presentation of draft 2020-2024 Consolidated Plan priority needs and budget categories.

Public Hearing 4, March 13, 2019: **HCDC**, consideration of 2020-2024 Consolidated Plan Council Policy Funding Resolution incorporating priority needs and budget categories.

Public Hearing 5, April 15, 2019: City Council, consideration of 2020-2024 Consolidated Plan Council Policy Funding Resolution incorporating priority needs and budget categories.

- viii. **Draft Consolidated Plan.** Based on survey data, focus group feedback, quantitative analysis, and staff recommendations, CD staff will prepare a draft 5-Year Consolidated Plan, which also includes proposed allocation of first-year funding. The Consolidated Plan shall include the amount of assistance the jurisdiction expects to receive (including grant funds and program income) and the range of activities that may be undertaken.

Comment Period and Public Hearing. A period of 30 calendar days will be provided to receive written comments on the draft 5-Year Consolidated Plan leading up to public hearing 6, and the date of hearing 6 is to be determined due to the federal appropriations process. The draft plan will be made available at City Hall and the City website. In addition, upon request, federal reports will be provided in a form accessible to persons with disabilities. No specific date for hearing 6 can be identified at this time, due to on-going delays in the federal appropriations process. Staff anticipates this hearing to be held sometime between April and September of 2020.

- ix. **Final Action on the Consolidated Plan.** All written or oral testimony provided will be considered in preparing the final 5-Year Consolidated Plan. A summary of testimony received and the City's reasons for accepting or not accepting the comments must be included in the final document. The City Council will consider these comments, HCDC recommendations, and the recommendations of the City Manager before taking final action on the 5-Year Consolidated Plan. Final action by the City Council will occur sometime between April and July of 2020, depending on the federal appropriations process. Once approved by City Council, the 5-Year Consolidated Plan will be submitted to HUD, and guide the expenditure of federal resources from January 1, 2020 through December 31, 2024.

B. **ONE-YEAR ACTION PLAN.** Each year the City must submit an annual Action Plan to HUD, reporting on how that year's funding allocation for CDBG and HOME entitlement grants will be used to achieve the goals outlined in the 5-Year Consolidated Plan.

- i. CD staff will gather input from citizens and consultation of local service providers to prepare the draft Action Plan. The annual CDBG and HOME application process will guide how funds are allocated on annual activities. The HCDC shall hold three public hearings for the development of each of the 5 funding year's draft Annual Action Plan and funding recommendations to City Council as follows:

Public Hearing 1, January: HCDC, Community Development Needs.

Public Hearing 2, June: HCDC, Public Projects (Streets, sewers, sidewalks, roads, internal housing programs).

Public Hearing 3, June: HCDC, Agency Projects (community facilities, housing, economic development).

- ii. The HCDC will be given the opportunity to make recommendations to the City Council prior to its final action on CDBG and HOME funding allocations for each year's Annual Action Plan.
- iii. CDD staff will gather public input and statistical data to prepare the draft Action Plan. A draft Action Plan will be available for 30 days for public comment.
- iv. The City Council shall conduct two public hearings to receive public comments on CDBG and HOME budget allocations and the draft Annual Action Plan. Final action by the City Council on the next year's Annual Action Plan will occur within 60 days of HUD notification of final annual funding allocations for each program year.
- v. When approved by City Council, the Action Plan will be submitted to HUD in accordance with federal requirements and direction of the St. Louis HUD Field Office.

C. SUBSTANTIAL AMENDMENTS TO CONSOLIDATED/ACTION PLAN.

Changes may be necessary to the 5-year Consolidated Plan and annual Action Plan after approval, the Citizen Participation Plan allows for "substantial amendments" to plans. These "substantial amendments" apply to changes in CDBG and HOME funding allocations. Substantial amendments are defined as:

- i. A project included in the plan is proposed to be deleted;
- ii. A new project is proposed to be added to the plan;
- iii. The City Council makes a change to allocation priorities, or in the method of distributing funds;
- iv. A cumulative change in the use of CDBG funds from an eligible activity to another eligible activity that decreases an activity's funding by 10% or more OR increases an activity's funding by 10% or more during the fiscal year.

In the event that there are substantial amendments to the 5-Year Consolidated Plan or annual Action Plan:

- i. The HCDC will be informed of the amendment and provided the opportunity to make recommendations to City Council;

- ii. CDD staff will draft a summary of the amendment and publish a brief summary of the proposed substantial amendment(s) after City Council approves the scheduling of a public hearing. Amendments to the Consolidated Plan or Annual Action Plan will include a 30-day public comment period
- iii. During the 30-day comment period, the City Council shall receive oral comments in public hearings;
- iv. Final action by the City Council will occur no sooner than fifteen calendar days following City Council approval of scheduling the public hearing for amendment.

D. CDBG COVID-19 Disaster Recovery Response Citizen Participation Procedures: Pursuant to U.S. Department of Housing and Urban Development Memorandum dated March 31, 2020 with the subject, “Availability of Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19, the City of Columbia allows for the following waivers of the 2020-2024 Citizen Participation Plan from May 4, 2020 through December 31, 2020, as it relates to Substantial Amendments to the Consolidated Plan and Annual Action Plan conducted in order to address the impacts of COVID-19:

- a. For substantial amendments formulated in response to address the health and economic impacts of COVID-19, the City will conduct the following notice procedures to allow for public comment and reasonable notice of amendments to an Annual Action Plan:
 - i. Any substantial amendment shall allow for at least a 5-day public comment period on any proposed amendment.
 - ii. The 5-day public comment period shall run concurrent with a scheduled Housing and Community Development Commission hearing.

E. **CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER).** The City is required to submit annually by March 31st a CAPER to HUD describing the City’s progress in meeting the goals in the 5-Year Consolidated Plan. The process for submitting the CAPER is as follows:

- i. CD Department staff prepares the draft CAPER.
- ii. After reasonable notice is provided, the CAPER is available for 15 days for written public comment.
- iii. The CAPER will be presented at a HCDC meeting.
- iv. The City Council will review and approve the CAPER by the second Council meeting in March through a public hearing.
- v. The final CAPER and public comments will be submitted to HUD within 90 days following the end of the previous CDBG and HOME program year.

F. **AMENDMENTS TO CITIZEN PARTICIPATION PLAN.** In the event that changes to this Citizen Participation Plan (CPP) are necessary, CDD staff shall draft proposed changes.

- i. After reasonable notice, these will be available to the public for 15 days for written comment.
- ii. The HCDC and City Council shall each hold a public hearing to receive oral public comments on the proposed change.
- iii. The HCDC will be given the opportunity to make recommendations to City Council prior to its final action.
- iv. Upon approval by City Council, the substantial amendment will be posted in the official City Council minutes and available online and in the City Clerk's office.

The City will review the CPP at a minimum of every 5 years for potential enhancement or modification; this review will occur as a component of the Consolidated Planning process.

5. GENERAL REQUIREMENTS

The City of Columbia is committed to compliance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973, as amended. Reasonable modifications and equal access to communications will be provided upon request. The City of Columbia does not discriminate on the basis of disability in the admission or access to, or treatment or employment in, its programs and activities.

- A. **Public Hearings.** Public hearings before the City Council, HCDC, and other appropriate community organizations will be advertised in accordance with the guidelines outlined in the notification section below. The purpose of public hearings is to provide an opportunity for citizens, public agencies, and other interested parties to provide input on the City's affordable housing, community and economic development needs. Public hearings will be held in locations accessible to low to moderate income residents and persons with disabilities. Spanish translation and translation for individuals with hearing impairments will be provided upon request.
- B. **Public Meetings.** Public meetings of the City Council and HCDC provide opportunities for citizen participation and comment on a continuous basis. Public meeting notices shall be posted in accordance with Missouri Sunshine Law and City of Columbia policies and procedures. Public meetings are held in locations accessible to persons with disabilities. Spanish translation and translation for individuals with hearing impairments will be provided upon request.

Notification. The CDD will provide the community advance notice of public hearings and/or public comment periods. The notice will be provided at least two weeks prior to

the public hearing date and the start date of comment periods. Related to the CPP specified federal documents, CDD will provide public notifications by utilizing City publications and media (television, print, electronic) that will maximize use of City resources and reach an increased number of Columbia residents. Related to federal publications referenced above, CD will notify the public about public hearings, comment periods, public meetings, and additional opportunities for public feedback through communications outlets that are designed to increase public participation and generate quantifiable feedback/results. CD will utilize the following notifications mechanisms as available: City-channel, print, electronic, television, CDD list-serve, and City website.

- C. **Document Access.** Copies of all planning documents, including the following federal reports: Citizen Participation Plan (CPP), 5-year Consolidated Plan, annual Action Plan, and the CAPER, will be available to the public upon request. Citizens will have the opportunity to review and comment on applicable federal reports in draft form prior to final adoption by the City Council. These documents will be made available at Community Development Department, and on the City’s website. In addition, upon request, federal reports will be provided in a form accessible to persons with disabilities.
- D. **Access to Records.** The City will provide citizens, public agencies, and other interested parties reasonable and timely access to information and records relating to the Citizen Participation Plan (CPP), 5-year Consolidated Plan, annual Action Plan, CAPER, and the City’s use of assistance under the two entitlement grant programs
- E. **Technical Assistance.** An annual application training session open to the general public will be held to assist new and returning applicants in submitting eligible proposals. City staff will provide technical assistance upon request and to the extent resources are available to groups or individuals needing assistance in preparing funding proposals, provided the level of technical assistance does not constitute a violation of federal or local rules or regulations. Assistance from City staff shall consist of communicating eligibility requirements, instructions for the application, estimated funding available, available data sources, and City priority needs.
- F. **CDBG COVID-19 Disaster Recovery Response Citizen Participation Procedures:**
Pursuant to U.S. Department of Housing and Urban Development Memorandum dated March 31, 2020 with the subject, “Availability of Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19, the City of Columbia allows for the following waivers of the 2020-2024 Citizen Participation Plan from May 4, 2020 through December 31, 2020, as it relates to Section 5 A-E:
Virtual hearing or meeting access to the public meetings by both staff and members of the public will be conducted in accordance with Missouri Sunshine law and approval of the City of Columbia Legal Department.

The provision of technical assistance does not involve re-assignment of City staff to the proposed project or group, or the use of City equipment, nor does technical assistance guarantee an award of funds.

6. COMPLAINTS

Written complaints related to CDD programs and activities funded through entitlement grant funding may be directed to the CDD and should follow the grievance procedures outlined in the City's CDBG and HOME Administrative Guidelines.

Complaints regarding the development of the Consolidated Plan, Annual Action Plan or CAPER shall be submitted to CD Department staff. A timely, written, and substantive response to the complainant will be prepared within 15 working days of receipt of the complaint by CD Department staff. If a response cannot be prepared within the 15-day period, the complainant will be notified of the approximate date a response will be provided. Written complaints must include complainant's name, address, and zip code. A daytime telephone number should also be included in the event further information or clarification is needed. Complaints should be addressed as follows:

City of Columbia
Community Development Department
Attn: Director
City of Columbia
701 E. Broadway
P.O. Box 6015
Columbia, MO 65205

If the response is not sufficient, an appeal may be directed to the City Manager, and a written response will be provided within 30 days. An appeal should be addressed as follows:

City Manager's Office
Attn: City Manager
701 E. Broadway
P.O. Box 6015
Columbia, MO 65205-6015

7. CITY OF COLUMBIA'S RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE PLAN

The City of Columbia does not anticipate any displacement to occur as a result of any HUD funded activities. All programs will be carried out in such a manner as to safeguard that no displacement occurs. However, in the event that a project involving displacement is mandated in order to address a concern for the general public's health and welfare, the City of Columbia will take the following steps:

- A. A public hearing will be held to allow interested citizens an opportunity to comment on the proposed project and voice any concerns regarding possible relocation. Notice of the public hearing/meeting will be made as per the procedure noted in Section 5 - General Requirements section of the Citizen Participation Plan.
- B. In the event that a project involving displacement is pursued, the City of Columbia will contact each person/household/business in the project area and/or hold public meetings, depending on the project size; inform persons of the project and their rights under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and respond to any questions or concerns.
- C. Relocation assistance will be provided in adherence with the City's Project Relocation Plan and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

The City's Anti-Displacement and Relocation Assistance Plan may be viewed in CD Department's Annual Action Plan submitted to HUD. The document is available on the City's website and 701 E Broadway, P.O. Box 6015, Columbia, MO 65205.

The City of Columbia is committed to compliance with the Americans with Disabilities Act. Reasonable modifications and equal access to communications will be provided upon request. For assistance please call (573) 874-7239. Telecommunications for the deaf is available at 1-800-MOR-ELAY. The City of Columbia does not discriminate on the basis of race, color, religion, sex, national origin, ancestry, marital status, familial status, disability status or sexual orientation.