

# Franklin County

# Citizen Participation Plan

Adoption Date:	
•	
Resolution #:	

# Applicability and Adoption of the Citizen Participation Plan

The Franklin County Economic Development and Planning Department (FCEDP) on behalf of the Franklin County Board of Commissioners (FCC) has designed this community-wide Citizen Participation Plan (CPP) to provide for and encourage citizen participation in the Community Development Block Grant (CDBG) program through the Consolidated Planning process, which includes:

- 5-Year Consolidated Plan (includes Program Year 1 Annual Action Plan),
- Subsequent Annual Action Plans (Program Years 2-5),
- Substantial amendments to a Consolidated Plan/Action Plan,
- Consolidated Annual Performance and Evaluation Report (CAPER).

This CPP is an essential element of Franklin County's present and future community development process and has been developed to comply with the regulations and requirements of the CDBG program as administered by FCEDP and the U.S. Department of Housing and Urban Development (HUD). This CPP was formally adopted by the FCC on the specified date and under the resolution number indicated at the top of this page. This CPP supersedes all other CPP's which may have been previously adopted by Franklin County.

The primary goal of this CPP is to provide all citizens of the community with adequate opportunity to participate (in an advisory role) in the planning, implementation, and assessment of Franklin County's CDBG programs. The CPP establishes policies and procedures for citizen participation, which are designed to maximize the opportunity for citizen participation in the community development process. Special emphasis has been placed on encouraging participation by persons of low and moderate incomes, residents of blighted neighborhoods, and residents of areas where community development funds are utilized.



Citizens are encouraged to participate in all phases of the CDBG programs and will be provided full access to program information. However, final responsibility and authority for the development and implementation of CDBG programs will lie with the FCEDP and FCC. Although this CPP has been developed in accordance with the CDBG regulation 24 CFR 91.105, Franklin County's Home Investment Partnership Program (HOME), the Emergency Solutions Grant (ESG) program, and the Assessment of Fair Housing (AFH) (all funded by HUD) may also be reviewed through this CPP process.

# **Encouragement of Citizen Participation**

The CPP actively encourages citizens, particularly low- and moderate-income individuals residing in designated revitalization areas, slum and blighted areas, and areas where Community Development Block Grant funds are proposed to be utilized, to participate in the development of the Consolidated Plan (including subsequent Annual Action Plans), substantial amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER, or "performance report").

The FCEDP will provide residents with reasonable and timely notice and access to all citizen participation activities. The FCEDP will notify the public at least about two weeks in advance of hearings, meetings, and comment periods via local newspapers and additionally, where possible, via its website, social media, and email listservs. Efforts shall be made to include minorities, non-English speakers, individuals with disabilities. The FCEDP will honor accommodations, upon request. All meetings will be conducted in accordable with accessibility and reasonable accommodation requirements as mandated by Section 504 of the Rehabilitation act of 1973 and the regulations at 24 CFR part 8, as well as the Americans with Disabilities Act and the regulations at 28 CFR parts 35 and 36, as applicable.

The FCEDP will make reasonable efforts to involve citizens in all phases of the development, implementation, and assessment of community development programs including, but not limited to, the following:

- Amount of available funds, including program income;
- Identification and assessment of housing and community development needs;
- Affirmatively furthering fair housing;
- Determination of projects;
- Amendments to approved projects; and
- Assessment of CDBG CAPER.



The FCEDP will adopt and explore a range of public involvement and outreach techniques to maximize community input, which may include, but is not limited to, the following:

- Developing a dedicated website to maintain current and prior Consolidated Plans, Action Plans, CAPERs, and other documents.
- Creating public timelines, with mailing lists to opt-in to regular updates.
- Holding in-person and virtual meetings, with recordings and meeting minutes for those unable to attend.

The FCEDP will track and evaluate its citizen participation activities and associated outcomes. The FCEDP will assess the effectiveness of its engagement activities to identify opportunities for improvement. Data may be collected through a variety of means including, but not limited to, participant sign-in sheets, participant surveys, and internal assessments of quality of information received. Results of community engagement events and comments received through public comment periods will be communicated to the public and included in relevant plans and reports.

The FCEDP will periodically assess the language needs of the community by reviewing demographic data from the U.S. Census Bureau, local school districts, and other relevant sources to identify the primary languages spoken by residents with limited English proficiency (LEP). Based on the assessment, the FCEDP will identify the need for translation of notices and other vital documents to ensure that LEP residents have meaningful access to information and can fully participate. The FCEDP will provide translation of vital documents, including public notices, meeting agendas, and key program documents, into the primary languages identified through the assessment. This will include Spanish and other languages spoken by a significant number of LEP residents. All public notices will include information on how non-English speaking residents can request translation services.

All phases of the community development process will be conducted by the FCEDP in an open forum. Citizens of Franklin County are encouraged to participate and will be given access to program information during each phase of any CDBG program as outlined herein. Information will be made available on the FCEDP and Franklin County's webpages. This information will include the recommendations of the Community Development Advisory Group described below.



# **Community Development Advisory Group**

The FCEDP with the approval of the County Administrator will aim to establish a Community Development Advisory Group (CDAG) in which the list of participants will be revisited annually, prior to starting the new program year planning process. Relevancy and previous involvement in the CDAG will be considered in creating the list of participants for the upcoming program year. The fundamental community development, affordable housing, and homeless providers serving Franklin County will remain the standard foundation of the CDAG and will serve in an advisory capacity to the FCEDP/FCC. This group is a staff created entity and shall not be considered a public body.

The CDAG will aim to be composed of, but not limited to, the following participants that represent local community development, affordable housing, and supportive housing initiatives:

- Local and regional community development institutions, All public notices will include information on how non-English speaking residents can request translation services. All public notices will include information on how non-English speaking residents can request translation services.
- Previous Franklin County CDBG, HOME, and ESG recipients
- Fair housing advocates.
- Continuums of Care.
- Affordable housing institutions and developers.\*
- Nonprofit organizations.
- Philanthropic organizations.
- Organizations that support individuals with disabilities.
- Organizations that support non-English speaking individuals.
- Community-based organizations.
- Faith-based organizations.

\*Public housing agencies, state housing finance agencies, other relevant housing organizations or trusts. These affordable housing agencies will be provided access to Franklin County's plans and will be directed to encourage participation by residents of public housing and other low-income residents in relevant areas.

#### Coordination with Public Housing Agencies:

All information regarding strategies to affirmatively further fair housing and activities relating to the development of the Consolidated Plan/Action Plan will be shared with public housing authorities (PHA) and surrounding communities. This



information will be made available to PHAs for their annual public hearings required for the PHA Plan.

# Minimizing Displacement and Assisting Displaced Persons:

The FCC is committed to minimizing displacement and will coordinate with other agencies, such as those included in the CDAG, to ensure comprehensive support. Strategies may include careful planning, community involvement, and early notifications to residents in the event of imminent procurement of property, extreme weather emergencies, or any other foreseeable occurrence which could result in displacement. Assistance for displaced persons may include relation assistance, financial aid for moving costs, advisory services, and special needs support. Types and levels of assistance may include rental assistance, homebuyer assistance, and local aid.

The CDAG is involved in the development of the Consolidated Plan, the Annual Action Plan, and the CDBG planning process. This involvement includes, but is not limited to the following:

- Annual updates;
- The identification of housing and community development needs and the setting of priorities;
- The review of proposed uses of funds; providing funding recommendations to the FCEDP; and
- The review of the CAPER.

The CDAG involvement can be implemented via in-person meetings, virtual meetings, or collecting surveys. The FCEDP will initiate the involvement activities at relevant stages of the program years. Housing-focused participants of the CDAG should engage residents of public and assisted housing developments, ensuring their involvement in the planning process.

#### Publication of the Consolidated Plan/Action Plan

In accordance with 24 CFR §91.105(e), FCEDP will ensure that during the development of the Consolidated Plan/Action Plan, prior to the publication of the proposed Consolidated Plan/Action Plan, at least one public hearing is held to obtain the views of residents of the community on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing, and to respond to proposals and questions (see Consolidated Plan/Annual Action Plan Public Hearings).



The FCEDP will ensure that the proposed Consolidated Plan/Action Plan is published in a manner that affords residents, public agencies, and other interested parties a reasonable opportunity to examine its content and to submit comments. The proposed plan will be published by:

- Providing a summary of the Consolidated Plan/Action Plan in one or more newspapers of general circulation. The summary will describe the content and purpose of the plan and include a list of locations where the full document can be reviewed, in compliance with 24 CFR §91.105(b).
- Making the full Consolidated Plan/Action Plan available on the FCEDP website.
- Making physical copies of the plan available at libraries and the FCEDP office.
- providing a reasonable number of free copies of the plan to residents and groups, upon request.
- Providing a minimum 30-day public comment period on the proposed Consolidated/Action plan. The 30-day comment period will commence after appropriate public notice of the comment period is given, the summary has been published, and after the draft plan is made available on the FCEDP website. The County must allow public comment to be received in writing and orally.

A summary of all comments or views of residents of the community received orally a public hearing or in writing during the preparation of the Consolidated/Action Plan, including during the public comment period, and a summary of any comments or views not accepted and the reasons why, must be attached to the final Consolidated Plan/Action Plan.

#### Amendments to the Consolidated Plan/Action Plan

During the program year, after the Consolidated Plan/Action Plan has been approved, it may be necessary to change one or more program activities; and add or remove activities. Some of these changes will be considered non-substantial and will require no formal action, other than the required documentation by the FCEDP. Other changes may be considered substantial and will require formal citizen participation and the FCC approval. Citizens will also have a reasonable opportunity to comment on both the original Consolidated Plan/Action Plan and subsequent substantial amendments. The following criteria set forth below defines a substantial change and a non-substantial change to the Consolidated



Plan/Action Plan and the appropriate action to be taken in either case. In the case of a substantial change, the requirements set forth below for a public hearing will be followed. The County must consider any comments or views of residents of the community received in writing, or orally at public hearings, if any, in preparing the substantial amendment of the Consolidated Plan/Action Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the substantial amendment of the Consolidated Plan/Action Plan.

#### <u>Criteria for Non-substantial Amendments:</u>

#### **Definition:**

Changes that are less than \$50,000 per project and do not add or delete a project. Once the cumulative changes over the course of the fiscal year total more than \$100,000, each future change (even those individual changes less than \$50,000) will require full citizen participation (as outlined under substantial changes); and a retroactive public notice detailing previously enacted changes.

#### Action:

- (1) A Summary of each change must be inserted in the Consolidated Plan/Action Plan file.
- (2) Changes to a particular project that alters only the beneficiaries or the activity to be undertaken (as long as the eligibility and national objective citations remain unchanged) <u>and</u> does not change the funded amount by more than \$50,000

#### Criteria for **Substantial** Amendments:

#### **Definition:**

The following changes shall be considered a "substantial-amendment" to the Consolidated Plan/Action Plan: 1) changes that are more than \$50,000 per project, but do not add or delete a project; 2) the addition of any project not previously approved; 3) the deletion of any previously-approved project; or 4) changes to a particular project that alter the beneficiaries or the activity to be undertaken, or that necessitates a change to the eligibility or national objective citation, or that change the location.



#### Action:

- (1) The County must hold a public hearing to solicit public comment regarding the proposed changes. About two weeks prior to the public hearing date, the County must issue formal public notice in newspaper of general circulation that outlines the proposed changes and provides notice for the public hearing. The County must provide the public at least 30 days to comment on the Consolidated Plan/Action Plan substantial amendment, and the publication notice must also inform the public of the comment period.
- (2) FCC approval of formal amendment to the Consolidated Plan/Action Plan, pending HUD approval.
- (3) Submission to HUD.

#### **Public Hearing Information**

In accordance with Federal regulations, Franklin County will conduct a minimum of two (2) annual public hearings to obtain residents' views and to respond to proposals and questions, at different stages of the program year. Some public hearings may be held at multiple geographic locations within Franklin County for the convenience of the public. Together, both hearings will address and allow for discussion of proposed strategies and actions for affirmatively furthering fair housing. At least one of these annual public hearings must occur during the development of the proposed Consolidated Plan/Action Plan, which also must occur prior to the proposed Consolidated Plan/Action Plan being published for public comment.

# Public Hearing Times, Locations, Notifications & Accessibility:

All public hearings will be held at times and locations which will be accessible to all citizens, especially persons of low and moderate incomes, residents of blighted neighborhoods and potential CDBG project areas. All public hearings will be held at times and locations convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities. All meetings will be conducted in accordable with accessibility and reasonable accommodation requirements as mandated by Section 504 of the Rehabilitation act of 1973 and the regulations at 24 CFR part 8, as well as the Americans with Disabilities Act and the regulations at 28 CFR parts 35 and 36, as applicable.

Public hearings will be scheduled at convenient times as determined by the FCEDP based on the projects proposed. Public hearings may be held at any site which, in



the opinion of the FCEDP, provides adequate access for citizen participation; meetings must be held within Franklin County to encourage meeting accessibility for residents and potential and actual beneficiaries and with accommodations for those with disabilities. Hearings will be held at sites that are centrally located and/or at locations taking proposed project sites into consideration for citizen convenience. The selected public hearing sites must be specified in the public hearing notices.

Notifications of public hearings will be published in the Columbus Dispatch or a comparable publication of general circulation and may be published in selected communities' local newspapers as applicable. All notices concerning the hearings shall be published, delivered or posted at least 12 calendar days prior to the date of the public hearing. Notices for public hearings may be run or posted, separately or together, as may be deemed necessary by Franklin County and as permissible by federal regulations. Additionally, notices should be available on the FCC and FCEDP internet sites, social media, and email listservs.

The locations of all public hearings as described herein shall be made accessible to persons with disabilities. The FCEDP shall provide a sign language interpreter or accommodations for blind persons whenever, if notified in advance, that one or more deaf or blind persons will be in attendance. The County will also undertake all reasonable actions necessary to allow non-English speaking citizens the ability to participate in public hearings. Such actions may include the provision of an interpreter for non-English speaking persons and/or the provision of information regarding the CDBG program in a format that such persons can comprehend, in the case of a public hearing where a significant number of non-English speaking residents can be reasonably expected to participate.

#### Needs Assessment & CAPER Review Public Hearing:

At least one public hearing shall be held prior to the FCEDP's CDBG program planning process. The primary purposes of this public hearing shall be to (1) obtain views of citizens, public agencies, and other interested parties on identifying housing and community development needs; (2) to notify the public of the upcoming CDBG planning process; and (3) to present the proposed CAPER for public comment and review.

In addition to following the notification requirements outlined above, notices and flyers concerning the meetings may be delivered to the targeted revitalization areas and known assisted housing residents in the jurisdictions.



Citizens will be provided with information concerning the CDBG program at this public hearing. Such information shall include, but not limited to:

- An overview of the CDBG Programs;
- A summary of the current Consolidated Plan/Action Plan;
- The amount of grant funds and program income the County projects to receive over the next program year;
- The range of activities which may be undertaken;
- The process to be followed in developing project funding requests;
- The project funding request timeframes and rating;
- The schedule of meetings and hearings; and
- A copy of the County's Displacement Plan.

Copies of the draft CAPER must also be available for review.

Citizens attending the Needs Assessment and CAPER Review Public Hearing will have the opportunity to comment both orally and in writing on the draft CAPER, past performance and on housing and community development needs. Publication for this hearing must specify that the County will receive public comment on the CAPER at this hearing and in writing for at least fifteen days. FCEDP will summarize all comments and views received regarding the CAPER, and must attach this to the final CAPER.

# Consolidated Plan/Annual Action Plan Public Hearings:

The Consolidated Plan is submitted once every 5 years, with an Annual Action Plan submitted every year. The Annual Action Plan outlines Franklin County's CDBG, HOME, ESG, and fair housing program activities for the upcoming year.

Prior to the beginning of the program year, prior to the publication of the draft Consolidated Plan/Action Plan, at least one public hearing will be held to obtain comments from citizens regarding:

- Any community development and housing needs that were not included in the Consolidated Plan/Action Plan;
- The development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing;
- Proposals and questions;
- The one Year Action Plan submitted as an annual update to the Consolidated Plan; and
- Program performance for the previous year.



Locations and notifications of these hearings must follow the requirements outlined above. Citizens of Franklin County will have the opportunity to comment on the performance of FCEDP staff, consultants, engineers, and contractors; and the actual use of HUD funds during the implementation of HUD programs. Citizens should also be requested to assess the performance of the FCEDP in resolving identified community development and housing needs, and in achieving its community development goals and objectives.

Before a Consolidated Plan/ Action Plan is adopted, the amount of assistance the County expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income, must be made available to residents, public agencies, and other interested parties through this public hearing, and in any other method deemed appropriate.

#### Additional Hearings:

Other public hearings may be held as deemed necessary by the Franklin County Board of Commissioners to inform citizens of community development activities, amendments, and to solicit citizen opinions and comments. All additional hearings shall comply with the public hearing requirements set forth in this Plan.

The exact dates and times of the hearings will be provided in the publications.

#### **Public Comment Periods**

The FCEDP will seek public comment on proposed Consolidated Plans, Action Plans, substantial amendments to Consolidated Plans/Action Plans, and draft CAPERs. Comment periods will be announced publicly on the FCEDP website and in newsprint through notices of related public hearings. A minimum 30-day public comment period will be provided to gather input on proposed Consolidated Plans/Action Plans and substantial amendments. A minimum 15-day public comment period will be provided to gather input on the draft CAPER. Public comment periods will commence on the date that the associated document is published on the FCEDP website, so long as proper public notice has been given as to the comment period and surrounding how the public can access the document to be reviewed.

#### Approval of Franklin County Board of Commissioners

After public comment and prior to submission to HUD, the FCEDP will provide final Consolidated Plans, Annual Action Plans, substantial amendments to Consolidated Plans/Action Plans, and CAPERs to the Franklin County Board of



Commissioners for review and approval, in any manner approved and adopted by the Franklin County Board of Commissioners.

## <u>Planning Process Timeline and Actions</u>

The FCEDP will aim to implement the following annual planning schedule for a typical year of HUD funding:

# **Planning Process Timeline and Actions**

• Engage in public consultation with stakeholders • Hold 1st public hearing to gather input on community needs and priorities • After this hearing, draft the Consolidated Plan/Annual Action Plan Sep-Nov • Publish the proposed Consolidated Plan/Annual Action Plan and issue notice for 30-day public comment period • Hold 2nd public hearing to gather feedback on the proposed Consolidated/Action Plan • Conclude the 30-day comment period and incorporate public comments into the Dec-Jan final Plan Obtain approval from the Franklin County Board of Commissioners • Aim to submit the final Consolidated Plan/Annual Action Plan to HUD by February 14th Feb Draft the CAPER Mar-Apr Publish the draft CAPER and issue public notice for 15-day public comment period • Hold public hearing to gather feedback on and review the draft CAPER • Conclude the public comment period and incorporate public comments into the May final CAPER Obtain approval from the Franklin County Board of Commissioners

Aim to submit the finalized CAPER to HUD by June 29th

June



# **Program Information and Access to Records**

The FCEDP shall make reasonable efforts to assure that all HUD program information is available to all citizens, especially those of low and moderate incomes and those residing in blighted neighborhoods and/or CDBG project areas.

At or as soon as feasible after the start of the public participation process, the FCEDP will make the HUD-provided data and any other supplemental information the jurisdiction plans to incorporate into its Consolidated Plan/Action Plan available to residents, public agencies, and other interested parties. This information may be made available by cross-referencing to the data on HUD's website.

To facilitate citizen access to program information, FCEDP Community Development staff will keep all documents related to the programs on file at the FCEDP office located at 150 South Front Street, FSL Suite 10, Columbus, Ohio, 43230. Information from the project files shall be made available for examination and duplication, on request, during regular business hours. Program information and materials, concerning specific projects will be available and distributed to the public at the regularly scheduled public hearings as outlined in this Plan. Furthermore, information concerning any project, including status, description allocation, expenditure, and outputs, should be available at regularly scheduled public meetings where the program is discussed.

Materials to be made available at the FCEDP office shall include, but will not be limited to: the CPP; records of public hearings; mailings and promotional materials; prior program requests for funding; letters of approval; grant agreements; environmental review records; financial and procurement records; project design and construction specifications; labor standards materials; performance and evaluation reports; other reports required by the HUD; proposed and approved program requests for funding for the current year or project; written comments or complaints received concerning the community development program, and written responses from the FCEDP; and copies of applicable Federal and State rules, regulations, policies, requirements, and procedures governing the HUD programs. The FCEDP will provide all documents, including the CPP, Consolidated Plan, as adopted, the Action Plan, as adopted, consolidated plan substantial amendments, and performance report, in a format accessible to persons with disabilities, upon request.

In no case shall the FCEDP disclose any information concerning the financial status of any program participant(s) which may be required to document



program eligibility or benefit. Furthermore, the FCEDP shall not disclose any information which may, in the opinion of the FCC or legal counsel, be deemed of a confidential nature.

The FCEDP will provide residents of the community, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan/Action Plan and use of assistance under the programs covered by this part during the preceding 5 years. These materials should be made available to the public online and at minimum, will be on file at the FCEDP office.

#### **Technical Assistance**

The FCEDP staff shall provide technical assistance to individual citizens and citizen groups, especially those groups representing persons of low or moderate income, as may be required to adequately provide for citizen participation in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan or Action Plan, and the planning, implementation, and assessment of HUD programs. The FCEDP will determine the level and type of technical assistance based on the needs of the citizens or groups requesting technical assistance.

Such technical assistance is intended to increase citizen participation in the community development decision making process and to ensure that such participation is meaningful. Technical assistance shall also be utilized to foster public understanding of HUD program requirements.

Technical assistance shall be provided upon request and may include, but not limited to: interpreting HUD program rules, regulations, procedures and/or requirements; providing information and/or materials concerning the HUD programs; and, assisting low and moderate income citizens, and residents of blighted neighborhoods to develop statements of views, identify their needs, and to develop activities and requests for project funding which, when implemented, will resolve those needs.

Technical assistance may be obtained by contacting the FCEDP during regular business hours at 614-525-3095.

#### <u>Procedures for Comments, Objections and Concerns</u>

Citizens are encouraged to submit their views on all aspects of Franklin County's HUD-funded programs at the scheduled public hearings. However, citizens may, at any time, submit written comments or concerns to the FCEDP.



Any citizen or citizens' group desiring to comment on any phase of the planning or the implementation of the programs, should submit such comments or concerns in writing to:

Franklin County Economic Development and Planning Dept. 150 South Front Street FSL Suite 10 Columbus, OH 43215-7104 communitydevelopment@franklincountyohio.gov 614-525-4874

The FCEDP is committed to providing a timely, substantive written response to all written resident complaints related to the Consolidated Plan, substantial amendments, revisions, and the performance report. The following procedures will be followed:

- Upon receipt of a written complaint, the FCEDP will strive to acknowledge receipt within 5 working days.
- The compliant will be reviewed and investigated by FCEDP staff. This may include gathering additional information from the complainant or other relevant sources.
- The FCEDP shall make every effort to provide timely, substantive written responses to citizen comments or concerns within 15 working days of the receipt where practicable. If a response cannot be provided within 15 working days, the complainant will be notified of the delay and given an estimated date by which a response will be provided.
- All complaints and responses will be documented and retained in the FCEDP records. This documentation will include the original complaint, any communications related to the complaint, and the final response.

The FCEDP will consider all comments and views of residents of the community received in writing, or orally at the public hearings, in preparing a Consolidated Plan, Action Plan, substantial amendment to a Consolidated Plan or Action Plan, and the performance report (CAPER). A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final documents.

Citizens wishing to object to the approval of the Consolidated Plan by HUD may make such objections to the HUD Columbus Field Office serving Franklin County:

U.S. Department of Housing and Urban Development Columbus Field Office



Community Planning and Development 200 North High Street Columbus, Ohio 43215

Although HUD will consider objections submitted anytime, such objections should be submitted within 30 days of the publication of the notice that the Consolidated Plan has been submitted to HUD.

#### **Use of CPP**

Franklin County shall adhere to the provisions outlined in this CPP.

#### **Implementation**

This CPP shall be implemented immediately upon adoption and shall remain in effect until amended or revised by EDP and the Franklin County Commissioners in accordance with applicable regulations and requirements and in a manner approved by FCC.

## **Review and Amendments of the CPP**

This CPP should be subject to an annual review by the FCEDP prior to starting a new program year planning process to ensure compliance with HUD regulations and to incorporate any necessary amendments to improve citizen engagement and participation processes. If changes are made, the original and proposed amended CPP will be made available for public information and comments through the FCEDP website. Amendments to the plan shall be adopted following the same procedures outlined herein.

# <u>Public Comment on the Original CPP and Substantial Amendments</u>

Citizens will be provided with a reasonable opportunity to comment on the original CPP and on any substantial amendments to the CPP. A public notice will be issued through publication in a local newspaper, and a public comment of at least 15 days will be provided for citizens to review and comment on the proposed changes. The FCEDP will make the original CPP and any substantial amendments to the CPP publicly available on the FCEDP website during the public comment period. The FCEDP will also make the CPP and any substantial amendments to it available in a format accessible to persons with disabilities, upon request.