

I. CITIZEN PARTICIPATION

Regulatory/Statutory Citations: 24 CFR 91.105.

A. Overview

The City encourages all citizens to participate in the development of the City's Consolidated Plan and action plans. The Citizen Participation Plan (CPP) also applies to any substantial amendments to the Consolidated Plan.

B. Goals

The goals for the City's CPP are as follows:

- Increase ongoing citizen participation, feedback, and involvement in activities of the Consolidated Plan, the action plan, substantial amendments, the use of CDBG-DR funds.
- Establish a Citizen Advisory Board (CAB) to assist in generating citizen participation, feedback, and involvement
- Actively seek involvement and engagement from the following, hereinafter referred to as Target Groups:
 - Extremely low, low and moderate-income people (LMI);
 - People living in areas where CDBG-DR funds are proposed to be used;
 - Residents of publicly assisted housing (PHA);
 - Low-income residents of target neighborhoods;
 - Minorities;
 - Non-English-speaking and limited English-speaking people;
 - People with disabilities;
 - People who are homeless; and
 - Agencies and organizations serving those listed above.
- Extend and strengthen partnerships among all levels of government and the private sector, including for-profit and nonprofit organizations.
- Implement qualitative and quantitative data collection methods to supplement existing information, provide ongoing planning data, and evaluate the impact of citizen engagement.

C. Policy: Public Hearings

The City will conduct at least two public hearings each program year to obtain citizens' views to respond to proposals and address any questions. The hearings will usually be conducted at Moore City Hall during a City Council meeting. The Council meeting is recessed, and the Public Hearing is convened

D. Policy: Consolidated Plan

The City will engage citizens during all phases of the five-year Consolidated Plan including:

- The Affirmative Fair Housing Assessment or Analysis to the Impediments of Fair Housing; and the Affirmative
- The development, implementation, review, and evaluation of the Consolidated Plan; and the annual action plan.
- While the CPP aims to ensure the participation of all residents, special assurances will be made to ensure the ongoing participation of the Target Groups.

E. Policy: Resource Allocation

Citizens will be encouraged to submit their views and proposals regarding the Consolidated Plan, the action plan, substantial amendments, the use of CDBG-DR funds.

Appropriate resources will be allocated to ensure the success of the CPP.

F. Policy: Accessibility

All public meetings will address the accessibility needs of all citizens by removing, to the extent possible, the physical, informational, social, and psychological barriers to participation.

To demonstrate a commitment to diversity and inclusion, City public meeting notices will specifically invite persons with physical, informational, social, and psychological barriers to participate and shall provide a contact and timeframe for obtaining assistance.

G. Policy: Diversity and Low-to-Moderate Income

Meetings will address the accessibility needs of very low, low, and moderate-income citizens, and people of color by removing, to the extent possible, the physical, informational, social, and psychological barriers to participation.

H. Policy: Homeless Persons

Meetings will address the accessibility needs of people who are homeless by removing, to the extent possible, the physical, informational, social, and psychological barriers to participation.

I. Policy: Cultural Appropriateness

Ongoing, regular, timely, adequate, and culturally and linguistically appropriate information will be provided to citizens in multiple formats, especially those in Target Groups.

Meeting notices and information will be published in a variety of formats (Spanish, large print, audio), venues (neighborhoods, organizations, places of worship, utility bills) and mainstream and targeted media (print, online, radio, television, community calendars, and social media—Facebook, Twitter, Snapchat) to reach the broadest audience. Examples: Black Chronicle; El Latino American; El Nacional de Oklahoma; Nuestra Comunidad; Oklahoma City Herald; Native American Times.)

J. Complaint Procedures

Written complaints from the public will receive a written reply within 15 working days. Comments and questions should be directed to:

City of Moore
 Attention: Project – Grants Manager
 Capital Planning and Resiliency Department
 301 N. Broadway Ave.
 Moore, OK 73160
 Phone: 405-793-4571

Website location: <https://www.cityofmoore.com/departments/grants-programs/complaints>

NOTE: It is HUD’s policy to encourage informal resolutions to matters and solicit voluntary compliance and corrective action. Noncompliance may result ultimately in the termination of or refusal to grant federal assistance.

K. Policy: CDBG-DR Substantial Amendment

Regulatory/Statutory Citations:

- A substantial amendment to the action plan for CDBG-DR shall be defined as:
- Addition of a new activity or project not previously described in the Consolidated or Action Plan;
- Deletion of an activity or project previously described in its Consolidated or Action Plan;
- Change in the purpose, scope, location or beneficiaries of an activity or project previously described in its Consolidated or Action Plan;
- Change in the use of CDBG-DR funds from one eligible activity or project to another previously described in its Consolidated or Action Plan;
- Change in an activity or project (previously described in its Consolidated or Action Plan)
- Change in the total dollar amount allocated or budgeted by more than \$1 million.

L. Citizen Participation Procedures

Regulatory/Statutory Citations: 24 CFR 507.441

1. General Procedures

Overview of Citizen Participation Procedures	
Responsible Party	Task
Project-Grants Manager (P-GM)	Allocates Resources; Maintains or caused to be maintained, all manuals, guides, and records
Administrative Assistant (CDBG-A)	Manages all aspects of public comment periods

Administrative Assistant (CDBG-A)	Posts all required documents to the <i>Grants, Programs and Disaster Recovery</i> page on the City's website
Project-Grants Manager (P-GM)	Provides, or causes to be provided, training and technical assistance to applicants

- The P-GM will take the following actions to allocate resources to the CPP:
 - Develop a budget;
 - Allocate personnel;
 - Allocate facilities and equipment;
 - Allocate funds for training and technical assistance for staff and community volunteers;
 - Allocate access to networks, organizations, and leadership; and
 - Seek community support for needed resources;
- Allocated CP&R staff will complete the tasks assigned.
- The P-GM is responsible for maintaining policies and procedures, operating guides/manuals, standards, and records as required by HUD;
 - The P-GM may assign staff or consultants to complete specific activities related to the tasks;
- The CDBG-A is responsible for posting all HUD required documents and/or documentation on the City's website (*Grants, Programs and Disaster Recovery*) and on community bulletin boards
- The CDBG-A is responsible for maintaining a 30-day comment period for all affected CPP activities; including:
 - Logging comments when received;
 - Preparing comments for responses by the P-GM;
 - Posting comments and responses in accordance with HUD requirements;
- The P-GM is responsible for providing training and technical assistance on policies and procedures for City staff and elected officials, contractors, subcontractors, the Citizen Advisory Board, and other interested parties.
 - The P-GM may assign staff or consultants to complete specific activities related to these tasks;

2. Scheduling and Access to Public Hearings Procedure

Overview of Public Hearing Procedures	
Responsible Party	Task
Project Grants Manager (P-GM)	Schedules hearings; Outreach to targeted parties

Administrative Assistant	Notices; Responds to questions; Directs questions to appropriate staff; Responds to and arranges accommodation requests; maintains records
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- The P-GM is responsible for the scheduling of public hearings;
- The P-GM is responsible for ensuring that public hearings are inclusive of target populations and meet the requirements of the City’s Citizen Participation policies;
- At the direction of the P-GM, the CDBG-A prepares the public notice which contains:
 - The date, time and location of the public hearing;
 - The substance of the public hearing;
 - A statement that the location is accessible and that provision will be made for people with disabilities when requests are made at 48 hours prior to a hearing.
 - A statement that translators will be provided for people who do not speak English when requests are made at least 48 hours prior to a hearing.
 - Contact information for the City Clerk;
- The CDBG-A publishes the public notice at least 14 days in advance of the public hearing;
 - Publication includes at a minimum: a general circulation newspaper, the City’s *Grants, Programs and Disaster Recovery* page on the City’s website, and all Community Bulletin Boards.
- The City Clerk answers inquiries regarding disability requests or translator requests and makes arrangements as necessary;
- The CDBG-A directs questions regarding the public hearing to the appropriate City staff

3. Public Hearings Procedure

Overview: Public Hearings	
Responsible Party	Task
Project Grants Manager (P-GM)	Respond to Comments
CDBG Administrative Assistant (CDBG-A)	Manage Public Comments

- Public hearings will be conducted in the presence of City staff or in the presence of the Mayor and City Council.
- Each citizen choosing to speak will be allowed a minimum amount of time to make a verbal presentation.
- A record of public comments will be compiled or obtained by the CDBG-A, who will provide the records to the P-GM;
- The P-GM shall provide responses to public comments (if applicable) to the CDBG-A;
- The CDBG-A will assemble the public comments and responses and attach the comments and responses to the required document

4. Citizen Advisory Board Procedures

Overview: Citizen Advisory Board	
Responsible Party	Task
Project Grants Manager (P-GM)	Citizen Advisory Board
CDBG Administrative Assistant (CDBG-A)	Engagement activities and records

- The P-GM shall establish and maintain a diverse Citizen Advisory Board (CAB) composed of citizens and organizations representing the target groups;
- The CAB shall meet on a regular basis, to be determined by the P-GM;
- The P-GM will manage the CAB with the assistance of the CDBG-A;
- The CAB, P-GM and the CDBG-A will identify local and regional agencies and organizations and other stakeholders for outreach and dissemination;
- The CAB, P-GM and the CDBG-A will recruit community volunteers from target groups and service providers to disseminate messages;
- The CDBG-A will use a variety of ongoing engagement activities in addition to meetings (e.g., social media, online and print media, and public service announcements) to encourage participation;
- All citizen participation will be conducted openly and documented via agenda, attendance records, meeting minutes, and documentation of communication(s);
 - The CDBG-A will maintain agenda, attendance records, and records of activities.

5. Accessibility Procedures

Overview: Accessibility Procedures	
Responsible Party	Task
CDBG Administrative Assistant (CDBG-A)	All

- Individuals who require physical, informational, social, or psychological accommodations will be asked to contact the City Clerk 48 hours in advance of the event;
- The CDBG-A shall manage the accommodation as appropriate to the situation;
- Accessibility considerations will include, but are not limited to:
 - Convenient meeting locations, centrally located or near public transportation.
 - Convenient meeting dates and times (e.g., evenings, weekends).
 - Ramps, elevators, parking, wheelchair/walker/scooter access;
 - Aisles and seating that allow for wheelchairs and scooters;
 - Adequate lighting in entrances and meeting spaces;
 - Appropriate signage (e.g., temporary Braille or tactile signs);
 - Accessible restrooms;
 - Walking/toileting area for service animals;

- Emergency procedures for people with disabilities;
- Assistive listening devices and/or interpreters for the hearing impaired; and
- Materials in alternate formats;
- The CDBG-A will make materials available in advance of the meeting to allow persons with learning and other cognitive impairments, as well as interpreters and other support personnel, to familiarize themselves with the materials;
- The CDBG-A shall maintain a record of accommodations made.

6. Target Population Procedures

Overview of Target Population Procedures	
Responsible Party	Task
City Clerk	All

- To demonstrate a commitment to diversity and inclusion, meeting notices will invite citizens with very low and low income, and persons of color using preferred communication modalities (e.g. radio, posters, social media, and online and/or print media).
- Individuals who require physical, informational, social, or psychological accommodations will be asked to contact the in advance of the event;
- The City Clerk shall manage the accommodation as appropriate to the situation;
- Accessibility considerations will include, but are not limited to:
 - Translators for citizens with limited English proficiency.
 - Culturally and linguistically appropriate materials in alternate formats.
 - Appropriate signage (e.g., in Spanish).
 - Convenient meeting locations, centrally located or near public transportation.
 - Convenient meeting dates and times (e.g., evenings, weekends).
 - Working with community organizations to provide transportation when public transportation is not available.
 - Working with community stakeholders to host virtual meetings.
- The City Clerk shall maintain a record of accommodations made.

7. Homeless Persons Procedures

Overview of Homeless Persons Participation Procedures	
Responsible Party	Task
Administrative Assistant (CDBG-A)	All

- To demonstrate a commitment to diversity and inclusion, meeting notices will invite citizens who are homeless using preferred communication modalities (e.g., word of mouth, radio, posters, social media, online and/or print media).

- Activities will be coordinated with the Continuum of Care.
- Individuals who require physical, informational, social, or psychological accommodations will be asked to contact CP&R three (3) days in advance of the event;
- The CDBG-A shall manage the accommodation as appropriate to the situation;
- Accessibility considerations will include, but are not limited to:
 - Translators for citizens with limited English proficiency;
 - Culturally and linguistically appropriate materials in alternate formats;
 - Convenient meeting locations; and
 - Working with community organizations to provide transportation when public transportation is not available.
- The CDBG-A shall maintain a record of accommodations made.

8. Cultural Appropriateness Procedures

• Overview of Cultural Appropriateness Procedures	
Responsible Party	Task
Administrative Assistant (CDBG-A)	All

- The CDBG-A shall develop a dissemination schedule in consultation with Citizen Advisory Board;
- The CDBG-A shall develop key messages by:
 - Working with subject matter experts to target message content in plain, understandable language.
 - Working with cultural and linguistic subject matter experts to translate content into the appropriate format.
 - Tying messages to existing activities/events/celebrations. (For example, November is Native American Heritage Month)
 - Disseminating messages via organizations, media, and the Citizen Advisory Board.
- Post public meeting the CDBG-A will evaluate the reach and impact of messages;
- The CDBG-A shall maintain a record of efforts made.