



CITY OF  
**SANFORD**  
FLORIDA

**CITY OF SANFORD  
COMMUNITY DEVELOPMENT BLOCK GRANT  
CITIZENS PARTICIPATION  
PLAN**



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## Citizen Participation Plan

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### **INTRODUCTION**

The City of Sanford Citizen Participation Plan (CPP) outlines ways in which the citizens of the City can participate in planning, development and implementation of its Community Development Block Grant (CDBG) program. Pursuant to 24 Code of Federal Regulations (CFR), Part 91, Subpart B, all participants in the CDBG and the Neighborhood Stabilization Program (NSP) are required to have a CPP in place that clearly states the opportunity for citizens input in the process. The CPP sets forth the policies, procedures, and implementation strategies that the City of Sanford will employ to support the involvement of the citizens of Sanford in the planning and development stages of the CDBG programs authorized by the U.S. Department of Housing and Urban Development (HUD). Citizens fulfill an essential role in outlining the needs of the community given their first-hand knowledge of the affordable housing, redevelopment, economic development and opportunity needs, as well as the human services needs of the homeless and those at risk of becoming homeless in our community. Also, the community is aware of the needs of the elderly and disable. The success of the CDBG programs will be maximized by partnering with those persons that receive the greatest benefits from these programs in determining the priority needs of our community, developing the goals and objectives to fulfilling those needs, and formulating the strategies to achieve these goals. The final decision-making authority of the CDBG programs rests with the City Commission, for they are ultimately responsible to both the citizens of the City of Sanford and to the Federal Government.

On August 10, 2010, City Commission approved the original CPP. At the March 25, 2013 City Commission meeting, the Commission approved the creation of a City of Sanford Community Development Block Grant Advisory Board to further enhance the role of citizen participation in

identifying and recommending programs and activities to address the needs of the low income, elderly, homeless, and disabled. With the participation of public, private, and minority individuals, not for-profit organizations, and faith based organizations, the City of Sanford Commission approved an update to the CPP. The CPP which incorporated the goals, policies, and implementation strategies that the City would encourage and ensure adequate citizen participation in the development of the Consolidated Plan, the One Year Action Plan, any substantial amendments to the Consolidated Plan, and the required performance reports.

At the August 10, 2015 City Commission Meeting, the Commission adopted the revised and updated CCP to be compliant with the City's 2015-2020 Five Year Consolidated Plan.

### **CARES ACT**

*March 27, 2020, the Coronavirus Aid, Relief and Economic Security Act (CARES Act) Public Law 116-136 was signed providing \$5 Billion for Community Development Block Grant programs to rapidly respond to COVID-19 and the economic and housing impact caused by this unprecedented crisis. Under the CARES Act, CDBG grantees may amend their Citizen's Participation Plan and Consolidated Plan concurrently in order to establish and implement expedited procedures with a comment period of no less than 5-days.*

*On May 18, 2020, the City of Sanford Commission approved a Substantial Amendment to the CPP to be compliant with the Coronavirus Aid, Relief and Economic Security Act (CARES Act), Public Law 116-136. The Amendment revised the CPP as follows:*

- *Include virtual hearings as an allowed method for citizen participation when necessary for public health reasons.*
- *Provide a 5-day notice/comment period for proposed amendments necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.*
- *Make minor edits that do not change current citizen participation policies. Please be advised that if virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.*
- *Include provisions relative to the Consolidated Planning process and participation waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act.*
- *Include provisions relative to the Community Development Block Grant (CDBG) and other applicable U.S. Department of Housing and Urban Development funding made available under the Coronavirus Aid Relief, and Security (CARES Act).*
- *Extend the Citizen Participation Plan for one year making the effective period of the Plan 2015-2021.*

## **PURPOSE**

The purpose of the CPP is to encourage maximum public participation from a broad cross section of the community to include minorities, non-English speaking persons and persons with disabilities in the planning process. Also, to meet the requirements of the U.S. Department of Housing and Urban Development for citizens involvement in identifying and addressing the needs in distressed areas of the City. It is of the utmost importance to the City that citizens know what is being planned and are given an opportunity to present their views. The following objectives will be employed to encourage maximum citizen participation.

## **CDBG ADVISORY BOARD**

The City uses CDBG grant funds for a wide range of housing and community development activities directed toward neighborhood revitalization, economic development and improved community facilities and services. The funding gives 'maximum feasible priority' to activities that will benefit low and moderate income persons or aid in the prevention or elimination of slums or blight. Although, the funding may also be used to meet other community development needs that present a serious and immediate threat to the health or welfare of the Sanford community. In order to achieve this desired goal and mandate of maximum citizen's participation the City Commission of the City of Sanford has determined that it is wise to create and appoint a "CDBG Advisory Board".

The purpose of the CDBG Advisory Board is to oversee the annual community needs and determine funding priorities relative to the City's CDBG program. The Board evaluates funding proposals for the use of the CDBG funds; makes funding recommendations to the City Commission and review performance and program revisions by CBDG funded agencies. The Board shall develop recommendations for the use of CDBG funds (a Federal entitlement program benefiting low and moderate income households). The City receives Federal CDBG funding on an annual basis which can be used to:

- 1) Benefit low and moderate-income persons
- 2) Eliminate slums or blight
- 3) Meet urgent needs

The CDBG Advisory Board will be composed of six (6) members appointed by the City Commission as follows:

- 1) The Mayor shall appoint 2 members to the Board.
- 2) Each District City Commissioner shall appoint 1 member to the Board.

\*Board members shall serve a two (2) year term.

When appointing members to the CDBG Advisory Board Commissioners will take into consideration the following:

- 1) All members of the CDBG Advisory Board must be City Residents.
- 2) All members of the Advisory Board shall be selected based on their qualifications and willingness to serve.
- 3) All members should, through education or experience, possess a basic understanding of government operations and funding; provided, that members shall whenever possible, include low and moderate income persons, members of minority groups, the elderly, the handicapped, the business community and civic groups who are concerned about the program. In any event, the Board shall actively encourage the participation and involvement of all persons of or from the listed groups as it formulates and makes its recommendation.

The CDBG Advisory Board shall meet as often as necessary in order to adequately accomplish its duties. The CDBG Board meetings are noticed and open to the public. The City Manager, or designee, is assigned the responsibility to take any and all necessary administrative actions that may be desirable or necessary to implement the actions of the CDBG Advisory Board necessary to be taken pursuant to the provisions of Resolution No. 2419.

*The Advisory Board, except as may be set forth herein or controlling law shall operate in a manner consistent with the provisions of Section 2-122 of the City Code. The CARES Act provided for the use of virtual board meetings and public hearings when necessary for public health reasons.*

## **CITIZEN'S PARTICIPATION**

The citizen's participation process is designed to ensure early, consistent and effective citizen's participation in the planning, development and implementation of proposed CDBG programs. Also the Plan is intended to encourage participation by low and moderate income persons, 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. The process will include but are not limited to:

- 1) Actively seek citizens of all income areas to participate and comment in the development and implementation of the Consolidated Plan/Annual Action Plan/Any Amendments/ CAPER/CDBG Programs.
- 2) Particular emphasis will be placed on encouraging persons of low and moderate-income, persons that reside in areas of slum and blight, residents of neighborhoods that are currently designated as target areas, and residents located in areas where CDBG funds are proposed to be used, and clients of human service agencies.
  - a) The definition of low and moderate income persons will be consistent with HUD current guidelines. (Person whose income is 80% or less of area median income)
  - b) The definition of low and moderate income neighborhoods will be consistent with HUD current guidelines (51% of residents are LMI)
- 3) City shall encourage the participation of local and regional institutions and other organizations (including businesses, developers, and community/faith-based organizations) in the process of developing and implementing the Consolidated Plan, Annual Action Plan, and Substantial Amendment, Consolidated Annual Performance and Evaluation Plan and CDBG Program.
- 4) Public meetings will be held to obtain citizen comments. A public comment period will be allotted to allow citizens adequate time to provide comments, and responses.
- 5) Public notification of meetings will be provided to human service agencies and faith based organizations to encourage the participation of minorities, non-English speaking persons, and persons with disabilities.
- 6) In addition to notices in newspapers, the City will notify the public of proposed Community Development activities and projects in City designated “impact areas” (target areas) through neighborhood-based methods. These methods may include direct contact with local neighborhood leaders; posting and/or distribution of notices in target area.
- 7) Public notification will be provided to the Public Housing Authority to encourage the participation of residents of public and assisted housing developments.
- 8) Reasonable and timely access to records and information relating to the CDBG programs and the use of assistance under the programs covered by CPP will be provided.
- 9) Technical assistance to eligible groups requesting funding assistance under the CDBG program will be provided.
- 10) Procedures for handling complaints have been developed and stated in the Management Procedure manual.

## **DEVELOPMENT OF THE CITIZEN’S PARTICIPATION PLAN**

Pursuant to the requirements of 24 CFR Part 91, Subpart B, in development of CPP, and in substantially amending the CPP, the following criteria shall be followed:

- 1) In the development of the CPP two Public Hearings will be held, one to solicit input into the development of the plan and one Public Hearing prior to the City Commission's approval of the Plan.
- 2) Substantial Amendment: One public hearing will be held prior to, or in conjunction with, the City Commission meeting approving the substantial amendment to the CPP. The nature of the substantial amendment will be taken into consideration when determining the time and location of the public hearing.
  - a. The Community Development program will advertise the proposed substantial amendment in a newspaper of general circulation within the City. The advertisement will describe the purpose of the amendment and where additional information may be examined. Public advertisement of the hearing will appear in the newspaper a minimum of 30 days prior to the hearing, published in legible print, and not in the legal section, to afford citizens a 30-day comment period.
  - b. *Under the CARES Act, CDBG grantees may amend Citizens Participation and Con Plans concurrently in order to establish and implement expedited procedures with a comment period of no less than 5-days during a declared disaster or emergency.*

**ACCESSIBILITY OF THE CITIZENS PARTICIPATION PLAN, CONSOLIDATED PLAN, ANNUAL ACTION PLAN, SUBSTANTIAL AMENDMENTS, AND CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT**

Any person who requires assistance in reading or understanding the Citizen Participation Plan/Consolidated Plan/Annual Action Plan/Any Amendments and CAPER due to disability or difficulty with the language will be provided assistance sufficient to enable them to understand its provisions.

1. The Citizen Participation Plan/Consolidated Plan/Annual Action Plan/Any Amendments and CAPER are available on the City website that is ADA compliant and accommodates the visually impaired.
2. The Citizen Participation Plan/Consolidated Plan/Annual Action Plan/Any Amendments and CAPER is available in the City Manager's Office at City Hall;
3. Upon request copies of the Citizen Participation Plan/Consolidated Plan/Annual Action Plan/Any Amendments and CAPER can be made available orally, Braille, electronic, or large print copies for the visually impaired; and/or delivering copies to the homebound.
4. A summary of the Consolidated Plan will be published through a public notice in a local newspaper for general circulation as a display ad in an appropriate section of the newspaper describing the contents and purpose and list of locations where



copies of the entire Consolidated Plan will be available for examination.

### **THE CONSOLIDATED PLAN PROCESS**

The policies and procedures in this CPP relate to several stages of action mentioned in law or regulation. These stages or events include:

- 1) Identification of housing, public services and community development needs.
- 2) Preparation of a proposed use of funds for the upcoming year called the Annual Action Plan. There might also be the development of a proposed new five-year strategic plan, the Consolidated Plan.
- 3) Formal approval by elected officials of a final five-year Consolidated Plan and/or Annual Action Plan.
- 4) Occasionally, during the year, it might be necessary to change the use of the funds already allocated in an Annual Action Plan, or to change priorities established in the five-year Consolidated Plan. In that case, a formal substantial Amendment will be proposed, considered, and acted upon.
- 5) The substantial Amendment will also need to be approved by elected officials.
- 6) After a "program year" is complete, a Consolidated Annual Performance and Evaluation Report (CAPER) will be drafted for public review and comment. The CAPER as well as any comments received is forwarded to HUD for review.
- 7) The City of Sanford "CDBG program year" and the City's fiscal year is October 1<sup>st</sup> through September 30<sup>th</sup>.

### **CITIZENS PARTICIPATION**

1. The City will encourage participation by low and moderate income persons, 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 in the development of the Plan.
2. City shall encourage the participation of local and regional institutions and other organizations (including businesses, developers, and community/faith-based organizations) in the process of developing and implementing the Consolidated Plan.
3. The City will encourage participation by residents of public and assisted housing and by other low-income residents of targeted revitalization areas in which public and assisted housing is located in developing and implementing the Consolidated Plan.

### **PUBLIC NOTICES**

Items Covered by the Public Notice Requirement

1. Advanced public notice will be given whenever a federally required document is available, such as the proposed Five Year Consolidated Plan and/or Annual Action Plan, any proposed Substantial Amendment to the Action Plan or Consolidated Plan, the and CAPER.
2. Advanced public notice will be given for all public hearings relating to the funds or planning process covered by the CPP.
3. All public notices will have language to the effect: “In accordance with the Americans with Disabilities Act, persons with disabilities needing assistance to participate in any of these proceedings should contact the City Clerk at 407.688.5010 at least 48 hours in advance of the meeting.”

- "Adequate" Public Notice

Enough lead-time will be given for the public to take informed action. The amount of lead-time can vary depending on the event. Specific amounts of times are outline later in the CPP for different events. The content of notices will give residents a clear understanding of the event being announced.

- Forms of Public Notice

1. Public notices will be published in a newspaper of general circulation within the City of Sanford.
2. The advertisements will be published in legible print, and not in the legal section. The advertisement will describe the nature of the proposal, list the location(s) where information may be examined, and provide for a public-comment period.
3. Notice may also be given through announcements to neighborhood organizations and agencies providing services to lower-income people or special needs clientele.
4. Notice will be sent to any person or organization requesting to be on a mailing list.
5. The public notice goes out to all local radio and television stations through the City Clerk’s Office or the Community Development Block Grant staff person.
6. Notice will be posted on the City Hall bulletin board.

## **PUBLIC HEARINGS**

1. Sufficient information will be published about the subject of the hearing to permit informed comments.
2. City of Sanford will consider any comments or views of citizens received in writing or orally at the public hearings. A summary of these comments or views, to include a summary of any comments or views not accepted, and the reasons therefor shall be made available and appended to the Plan.

3. The City's public hearings will be held in a location, which can be accessed by all citizens. The common locations are the City Commission Chamber and the Sanford Westside Center. These locations are well known to City citizens and are handicapped accessible. Times of hearings may vary from day to evening, affording more citizens the opportunity to attend. On occasions a public hearing may be held in a church or the community room at the Sanford Police Department.
4. The needs of non-English speaking citizens will be met in the case of public hearings where a significant number of non-English speaking citizens can be reasonably expected to participate. A City employee who is bilingual in Spanish and English will attend to translate for staff and the citizens.
5. Hearing will be held at convenient locations that provide for accommodations for the disabled.
  - Significant number is defined as 10% or more
6. *Under the CARES Act, CDBG grantees may amend Citizens Participation and Con Plans concurrently in order to establish and implement expedited procedures with a comment period of no less than 5-days during a declared disaster or emergency.*
7. *The CARES Act provided for the use of virtual board meetings and public hearings when necessary for public health reasons.*

## **MEETINGS**

1. The City of Sanford will provide citizens with reasonable and timely access to local meetings. A minimum 15-day notice will be afforded to citizens before the actual meeting is held.
2. Meetings will be held in a location, which can be accessed by all citizens. The common locations are the City Commission Chamber and the Sanford Westside Center. These locations are well known to City citizens and are handicapped accessible. Times of hearings may vary from day to evening, affording more citizens the opportunity to attend. On occasions a public hearing may be held in a church or the community room at the Sanford Police Department.
3. If it is determined that a significant number of non-English speaking citizens or hearing or visually impaired citizens are expected at a public hearing or meeting, the City Clerk's Office will be notified, and an interpreter will be provided.
4. *The CARES Act provided for the use of virtual board meetings and public hearings when necessary for public health reasons.*

## **PUBLIC ACCESS TO CONSOLIDATED PLAN**

As required by law, the City of Sanford will provide the public with reasonable and timely access to information and records relating to the data or content of the Consolidated Plan and actual use of funds as well as the proposed, actual, and past use of funds. Regarding the past use of funds, the law requires reasonable public access to records about any uses of these funds during the previous five years. All CDBG records will be retained for 5 fiscal years after completion of grant cycle.

1. The Consolidated Plan as proposed and/or as adopted, Annual Action Plans, Substantial Amendments, the CAPER, and CPP will be made available at no cost to the public by the Community Development Block Grant staff person or the City Clerk's Office.
2. Free copies of the Consolidated Plan will be available at the Downtown Library.
3. If requested, information and materials will be made available in a form accessible to persons with disabilities.
4. All information relative to the CDBG programs will be available at City Hall and may be obtained by contacting the City of Sanford Community Development Block Grant Manager - Olatunji Oyewale, by calling 407.562.2779 during business hours of 7:30AM to 5:30PM Monday through Thursday.
5. The Plan is available on the City website that is ADA compliant and accommodates the visually impaired.
6. A summary of the Consolidated Plan will be published in a local newspaper for general circulation as a display ad in an appropriate section of the newspaper. The summary will include:
  - a. A description of the content and purpose of the Consolidated Plan; and
  - b. A list of locations where copies of the entire proposed Consolidated Plan may be obtained.

## **ACCESS TO RECORDS**

The City of Sanford will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and the use of assistance under the programs covered by this CPP during the preceding five years. The City of Sanford may charge reasonable fees for the duplication and provision of materials. Confidential information normally protected under state and federal freedom of information laws will not be available for public review.

## **TECHNICAL ASSISTANCE**

The CDBG program coordinator will provide technical assistance to group's representative of persons of low and moderate-income that requests such assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. The level and type of assistance will be determined as needed on a case-by-case basis. Technical assistance does not guarantee the provision of funds to any group.

## **DEVELOPMENT OF THE CONSOLIDATED PLAN**

Pursuant to the requirements of 24 CFR Part 91, Consolidated Submissions for CDBG programs, the Consolidated Plan serves as the City of Sanford planning document, application for Federal funds, strategic plan in carrying out HUD programs, and an action plan that provides the basis for assessing performance. In the development of the Plan the will encourage participation by low and moderate income persons, 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.

Prior to the City Commission adopting the Consolidated Plan, the program coordinator will make available to citizens, public agencies, adjacent local governments, the State of Florida, and other interested parties information that includes the amount of assistance the City of Sanford expects to receive from grant funds and program income. The City of Sanford plan to minimize displacement of persons and to assist any persons displaced as set forth within the City's Anti-displacement and Relocation Assistance Plan. The information will also include the range of activities that may be undertaken and the estimated amount that will benefit persons of low and moderate-income including activities to be undertaken with Section 108 guaranteed loan funds. The following participation policies are established for the development of the Consolidated Plan.

- **Consultation Requirements**

- 1) During preparation of the Consolidated Plan, the City of Sanford will consult with other public and private agencies that provide assisted housing, health services, and social services and fair housing services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.
- 2) When preparing the portion of the Consolidated Plan relating to the homeless strategy, the City of Sanford shall consult with public and private agencies that provide assisted housing, health services, and social services to determine what resources are available to address the needs of any persons that are chronically homeless.
- 3) When preparing the portion of the Consolidated Plan concerned with lead-based paint hazards, the City of Sanford will consult with State or local health and child-welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead poisoned.

- 4) Preparing the description of priority non-housing community development needs, the City of Sanford will notify adjacent units of general local government, to the extent practicable, and provide a copy to the Florida State Clearinghouse, Department of Community Affairs, 2555 Shumard Oak Boulevard, Tallahassee, Florida 32399-2100.
- 5) The City of Sanford will consult with Seminole County government, particularly for problems and solutions that go beyond the City's jurisdiction.
- 6) The City of Sanford will consult with the Public Housing Authority (PHA) concerning consideration of public housing needs and planned programs and activities. This consultation will help provide a better basis for the certification by the authorized official that the PHA Plan is consistent with the Consolidated Plan and the City's description of the manner in which it will address the needs of public housing and, where necessary, the manner in which it will provide financial or other assistance to a troubled PHA to improve its operations and remove such designation. It will also help ensure that activities with regard to local drug elimination, neighborhood improvement programs, and resident programs and services, funded under the PHA's program and those funded under a program covered by the Consolidated Plan, are fully coordinated to achieve comprehensive community development goals. If the PHA is required to implement remedies under a Section 504 Voluntary Compliance Agreement to provide accessible units for persons with disabilities, the City will consult with the PHA and identify actions it may take, if any, to assist the PHA in implementing the required remedies. CDBG funds may be used for eligible activities, or other funds may be used to implement remedies required under a Section 504 Voluntary Compliance Agreement.

- Public Hearings/Notification

- 1) Two public hearings will be held during the development of the Consolidated Plan. In order to establish a unified vision for future community development needs, the first hearing will occur prior to publishing a summary of the proposed activities and Consolidated Plan. Public advertisement of the first public hearing will appear in the newspaper a minimum of 15 days prior to the hearing. The second hearing will occur after the draft Consolidated Plan is written and the summary is published for comment. The published summary will describe the contents and purpose of the Consolidated Plan and list the locations where copies of the Consolidated Plan may be examined. Advertisement of the second public hearing will appear in the newspaper a minimum of 30 days prior to the hearing and prior to submission to HUD in order to allow for a 30 day public comment period.
- 2) Public hearings will be held in a location, which can be accessed by all citizens and accommodated.

- 3) *Under the CARES Act, CDBG grantees may amend Citizens Participation and Con Plans and Annual Action Plans concurrently in order to establish and implement expedited procedures with a comment period of no less than 5-days during a declared disaster or emergency.*
  - 4) *The CARES Act provided for the use of virtual board meetings and public hearings when necessary for public health reasons.*
  - 5) Advertisements will be published in legible print and not in the legal section. Copies will be available at City Hall in the Community Development Office and on the City's website at [www.sanfordfl.gov](http://www.sanfordfl.gov). The Community Development program office, upon request, will make free copies available.
- Citizen-Comment Requirements
    - 1) In preparing the final Consolidated Plan, the City of Sanford will consider any comments or views of citizens received in writing or orally at the public hearings. A summary of these comments or views, a summary of any comments or views not accepted, and the reasons therefor shall be incorporated into the Consolidated Plan.
    - 2) During the development the City of Sanford will provide a minimum 30 day public comment period when publishing a summary of the Consolidated Plan.

## **ANNUAL ACTION PLAN**

Pursuant to the requirements of 24 CFR Part 91, Consolidated Submissions for CDBG Programs, the Annual Action Plan, provides the public with an estimate of the amount of CDBG funds it expects to receive in the upcoming year. The plan also provides a description of the range of types of activities that are to be funded with these resources and how these funds will be used in ways that will benefit low and moderate-income people.

- Citizens Participation
  - 1) The City will encourage participation by low and moderate income persons, 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.
  - 2) City shall encourage the participation of local and regional institutions and other organizations (including businesses, developers, and community/faith-based organizations) in the process of developing and implementing the Consolidated Plan.
- Public Hearings/Notification

- 1) Public hearings will be held in a location, which can be accessed by all citizens. Also, the hearings will be held at a time that is convenient and accommodates the public and persons with disabilities.
  - 2) During the development of the Annual Action Plan two public hearings will be held. Public advertisement of the first public hearing will appear in the newspaper a minimum of 15 days prior to the hearing. The first hearing will occur at the kickoff meeting announcing the availability of funds and explaining the process to those interested in applying for funding.
  - 3) Notice of the second public hearing will be advertised along with the summary of the proposed Annual Action Plan. The summary will describe an estimate of the amount of CDBG funds the City expects to receive in the upcoming year; provide a description of the range of types of activities that are to be funded with these resources; and explain how these funds will be used in ways that will benefit low- and moderate-income people. The summary will list the locations where copies of the Annual Action Plan may be examined. This notice will appear in a newspaper a minimum of 30 days prior to the second hearing and prior to submission to HUD in order to allow for a 30 day public-comment period.
  - 4) Advertisement will be published in legible print and not in the legal section. Copies will be forwarded to adjacent units of general local government and the County libraries. The City of Sanford Community Development program Coordinator, upon request, will make free copies available.
  - 5) *The CARES Act provided for the use of virtual board meetings and public hearings when necessary for public health reasons.*
  - 6) *Under the CARES Act, CDBG grantees may amend Citizens Participation and Con Plans and Annual Action Plans concurrently in order to establish and implement expedited procedures with a comment period of no less than 5-days during a declared disaster or emergency.*
- Citizen Comment Requirements
    - 1) In preparing the final Annual Action Plan, the City of Sanford will consider any comments or views of citizens received in writing or orally at the public hearings. A summary of these comments or views, a summary of any comments or views not accepted, and the reasons therefor shall be incorporated into the Annual Action Plan.
    - 2) The City of Sanford will provide a minimum 30-day public-comment period when publishing a summary of the Annual Action Plan.
    - 3) *Under the CARES Act, CDBG grantees may amend Citizens Participation and Con Plans and Annual Action Plans concurrently in order to establish and implement*



*expedited procedures with a comment period of no less than 5-days during a declared disaster or emergency.*

## **SUBSTANTIAL AMENDMENTS**

Pursuant to the requirements of 24 CFR 91.505, The City of Sanford will use the following criteria for determining what changes in the planned or actual CDBG activities constitute a substantial amendment to the Consolidated Plan:

1. The use of funds changes from one eligible activity to another. Movement of funds from cancelled activities to eligible alternate activities, or funding alternate activities with excess program income are not considered amendments.
2. A decision is made to make a change in the allocation priorities or a change in the method of distribution of funds.
3. A decision is made to carry out an activity, using funds from any program covered by the Consolidated Plan including program income, not previously described in the Action Plan.
4. A decision is made not to carry out an activity described in the Action Plan. This does not include activities which must be dropped due to circumstances beyond the control of the City of Sanford, e.g., a subgrantee elects not to do an activity; the activity fails because a property owner refuses to sell; etc. In this instance, funds may be reprogrammed to an alternate activity without amending the Action Plan. However, reallocation of funds to a new activity not previously described in the Action Plan will be a substantial amendment.
5. The purpose, scope, location or beneficiaries of an activity are substantially changed. An activity will be considered substantially changed when any one of the following criteria applies:
  - a. The activity will no longer principally benefit the targeted population as identified in the Action Plan (e.g., senior citizens in certain areas, low- and moderate-income homeowners, homeless men, residents of x neighborhood instead of y neighborhood, pregnant teenagers).
  - b. The activity will no longer address the low- and moderate-income need identified in the Action Plan (e.g., shelter for homeless, center for senior citizens, housing for low- and moderate-income households, training as daycare providers) or the activity ceases to address the elimination of slums and blight as identified in the Action Plan.
  - c. The activity location of an area-benefiting activity changes so that the completed activity will principally serve beneficiaries other than those originally intended.
  - d. The scope of the activity has increased to the point where its completion with project funds would result in the inability to carry out another approved activity, or would necessitate reducing the scope of another activity to a point where it would not

accomplish its intended purpose.

- Citizens Participation

- 1) The City will encourage participation by low and moderate income persons, 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.
- 2) City shall encourage the participation of local and regional institutions and other organizations (including businesses, developers, and community/faith-based organizations) in the process of developing and implementing the Consolidated Plan.

- Public Hearing/Notification

- 1) One public hearing will be held prior to, or in conjunction with, the City Commission approving substantial amendment. The nature of the substantial amendment will be taken into consideration when determining the time and location of the public hearing.
- 2) The Community Development Program will advertise the proposed substantial amendment in a newspaper of general circulation within the City. The advertisement will provide sufficient information about the amendment to permit informed comment. Public advertisement of the hearing will appear in the newspaper a minimum of 30 days prior to the hearing, published in legible print, and not in the legal section.
- 3) *Under the CARES Act, CDBG grantees may amend Citizens Participation and Con Plans and Annual Action Plans concurrently in order to establish and implement expedited procedures with a comment period of no less than 5-days during a declared disaster or emergency.*
- 4) *The CARES Act provided for the use of virtual board meetings and public hearings when necessary for public health reasons*

- Citizen Comment Requirements

- 1) The City of Sanford will provide at least 30 days to receive comments on the substantial amendment before the amendment is approved by the City Commission and submitted to HUD.
- 2) The City of Sanford will consider any comments or views of citizens received in writing or orally at the public hearing in preparing the Substantial Amendment. A

summary of these comments or views, a summary of any comments or views not accepted, and the reasons therefor shall be attached to the substantial amendment.

- 3) *Under the CARES Act, CDBG grantees may amend Citizens Participation and Con Plans and Annual Action Plans concurrently in order to establish and implement expedited procedures with a comment period of no less than 5-days during a declared disaster or emergency.*

## **CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORTS**

The Annual Performance Report will describe how funds were actually used and the extent to which these funds were used to benefit low and moderate income people. Provide reasonable notice that an Annual Performance Report is available so that residents can review and comment on it.

- 1) A notice of the Annual Performance Report will be placed in a newspaper of general circulation a minimum of 15 days prior to submission to HUD. The notice will state that comments must be received by the Community Development program within 15 days of the date of advertisement and the location where the performance report will be made available for examination.
- 2) In the preparation of the CAPER City of Sanford will consider any comments or views of citizens received during the public comment period. A summary of these comments or views shall be attached to the performance report.
- 3) A complete copy of the CAPER will be available to the public at no cost within two business days of a request. Also, copies will be available for review to the public at City Hall and the Downtown library.
- 4) There will be a public hearing regarding the CAPER to receive public input during the 15 day comment period.
- 7) Public hearings will be held in a location, which can be accessed by all citizens. Also, the hearings will be held at a time that is convenient and accommodates the public and persons with disabilities.
- 8) The City will encourage participation by low and moderate income persons, 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.
- 9) City shall encourage the participation of local and regional institutions and other organizations (including businesses, developers, and community/faith-based organizations) in the process of developing and implementing the Consolidated Plan.

10) *Under the CARES Act, CDBG grantees may amend Citizens Participation and Con Plans and Annual Action Plans concurrently in order to establish and implement expedited procedures with a comment period of no less than 5-days during a declared disaster or emergency.*

11) *The CARES Act provided for the use of virtual board meetings and public hearings when necessary for public health reasons*

#### Citizens Participation of CAPER Development

- 1) The City will encourage participation by low and moderate income persons, 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.
- 2) City shall encourage the participation of local and regional institutions and other organizations (including businesses, developers, and community/faith-based organizations) in the process of developing and implementing the Consolidated Plan

#### **ANTIDISPLACEMENT AND RELOCATION ASSISTANCE PLAN**

The City of Sanford will take all reasonable steps to prevent and minimize the displacement of families, individuals, businesses, non-profits organizations and farms as a result of activities assisted under the CDBG Program. In the event that a project requires relocation of persons, the City of Sanford has an Anti-displacement and Relocation Assistance Plan in place to address relocation needs. This plan was adopted in 2010.

#### **COMPLAINTS**

The City of Sanford will provide a substantive, written response to every written, citizen complaint related to the Consolidated Plan, amendments and the performance report within 15 working days of receipt.

#### **CHANGES TO THE CITIZENS PARTICIAPTION PLAN**

The CPP can be changed only after the public has been notified of intent to modify it, and only after the public has had a reasonable chance to review and comment on proposed change

- 1) The requirement for citizen participation does not restrict the responsibility or authority of the City of Sanford for the development and execution of its Consolidated Plan.

- 2) *Under the CARES Act, CDBG grantees may amend Citizens Participation and Con Plans and Annual Action Plans concurrently in order to establish and implement expedited procedures with a comment period of no less than 5-days during a declared disaster or emergency.*

**ADOPTION OF PLAN**

Original Plan	August 2010
First Amendment	June 2015
Second Amendment COVID-19	May 2020