

CITY OF ALTOONA, PENNSYLVANIA

CITIZEN PARTICIPATION PLAN

for Housing and Community Development Programs

funded by the U.S. Department of

Housing & Urban Development

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I. Purpose

The purpose of this Citizen Participation Plan is to provide a process by which citizens and citizen organizations of the community can become informed and take an active part in the development, implementation, and review of activities carried out by the City of Altoona under its Consolidated Plan, which is described below. The Citizen Participation Plan also sets guidelines for citizen participation in a Section 108 Guaranteed Loan and any other housing and community development programs funded by the U.S. Department of Housing and Urban Development (HUD) in which the City participates.

All of the HUD Programs referred to in this Plan are described in brief in Appendix B with directions for obtaining more detailed information about the programs.

II. Applicability

This Citizen Participation Plan will apply to City housing and community development programs funded by HUD until all activities assisted by these Programs are completed, or until this Plan is superseded by a new one, or until such time as this Plan is abolished by an action of the City Council.

III. Historical Background

Since the City began participating in the Community Development Block Grant (CDBG) Program in 1974, the City has followed a citizen participation plan patterned along HUD guidelines and requirements. The initial plan explained how and when citizen participation was to be encouraged and included in the various stages of the City's CDBG Program. With the 1977 creation of HUD's Urban Development Action Grant (UDAG) Program, a special project-specific grant program to assist economically distressed communities, the plan was expanded to cover that program, too. (Note: The UDAG Program was terminated in 1989.)

Congress abolished the requirement for a citizen participation plan in 1981. Nevertheless, the City continued to follow the practices of its adopted plan in order to promote citizen participation in the CDBG and UDAG Programs, as well as the 1983 HUD Jobs Bill, a one-time emergency job creation program.

In 1987, HUD restored its requirement for a citizen participation plan based on new legislation and guidelines. The City adopted a new citizen participation plan on January 26, 1988, to conform to the new guidelines. Several amendments to the plan were made since that time.

In 1994, new legislation was introduced that made important changes in the way four HUD-funded programs and a major HUD planning document operate. Communities that carry out housing and community development programs that are funded by HUD were directed to prepare a "Consolidated Plan", also called a consolidated strategy or application, beginning in 1995, that included:

- Community Development Block Grant Program
- Emergency Shelter Grant Program
- HOME Investment Partnerships Program
- Housing Opportunities for Persons with AIDS Program
- Comprehensive Housing Affordability Strategy

The purpose of the consolidation was to provide for uniform planning for HUD assistance and to reduce the time and money involved in preparing, carrying out and reporting on individual HUD programs that had been following separate time frames, separate planning processes, separate applications and

separate reporting procedures. The requirements for a consolidated plan affect Altoona in the following ways:

Before the Consolidated Plan	With the Consolidated Plan
The City prepared an annual plan for each HUD program and applied annually for funding for each HUD program.	The City prepares a three to five year plan * for all the programs. The City applies annually for funding for each program under the plan after preparing a one-year Action Plan conducting the full citizen participation process. * The City has chosen: 5 year plan period
The City operated each program on a different 12-month period: CHAS October 1 - September 30 CDBG April 1 - March 31 ESG July 1 - June 30 HOME	The City selects the particular 12-month period * over which it will operate all the programs: * The City has selected: July 1 - June 30
The City held separate public hearings and meetings for each program.	The City holds public hearings and meetings that cover all the programs.
The City prepared separate annual performance reports at the close of the CHAS, CDBG, ESG and HOME program periods.	The City prepares one consolidated performance evaluation report, known as the "CAPER" at the close of the 12-month program period. (Note: The report will <u>not</u> mingle the CDBG and HOME funds, projects or accomplishments. It will contain separate reports on each program.)

IV. General Information

HUD regulations require a community receiving assistance from HUD to follow a detailed citizen participation plan in order to receive assistance. The plan must:

(A) provide for and encourage citizen participation with particular emphasis on participation by persons of low income, very low income and extremely low income and persons who are residents of slum and blight areas and of areas in which HUD funds are proposed to be used and persons who are residents of designated revitalization or enterprise community areas, as defined by the local jurisdiction;

(B) provide citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, as required by regulations of the Secretary, and relating to the actual use of funds;

(C) provide for technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;

(D) provide for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the consolidated planning and community development and housing programs, including at least the development of needs, the review of proposed activities and review of program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for persons with disabilities;

(E) provide for a timely written answer to written complaints and grievances, within 15 working days where practicable; and

(F) identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

None of the above requirements are to be interpreted as restricting the responsibility or authority of the community for the development and execution of its Consolidated Plan and the HUD-funded programs covered by the Plan.

The City of Altoona will post public notices at a minimum of the following locations: City Hall, the Public Library, the Altoona Housing Authority Office, and the City Department of Planning and Community Development prior to holding a public meeting or hearing on the consolidated planning process and housing and community development programs funded by HUD. Additional notices will air on the local access channel. As appropriate, the City will disseminate public notices for HUD Programs using its Public Mailing List, City of Altoona's Web Page and may place advertisements in the *Altoona Mirror* and other widely circulated publications.

It will follow this process for the five year Consolidated Plan, including the one year Action Plan, and the Consolidated Performance and Evaluation Report to HUD, and for a substantial amendment to the Consolidated Plan, as defined in the section of this Citizen Participation Plan entitled "Substantial Amendment of a Project". HUD regulations mandate a 30-day comment period prior to adoption or amendment of the Consolidated Plan (this does not include individual project amendments), and a 30-day comment period prior to adoption of a substantial amendment (defined in Part VII) of an individual project. HUD regulations mandate a 15-day comment period prior to submitting the Consolidated Performance and Evaluation Report to HUD.

The City will consider any comments or views of citizens received in writing, or orally at the public hearing(s), in preparing the five year Consolidated Plan, the annual one year Action Plan, the annual Consolidated Performance and Evaluation Report, and substantial amendment(s) to the Consolidated Plan and/or Action Plan.

In order to emphasize the need for participation by very low-income, low-income and moderate-income persons, the City will include language in its advertised Public Notices that calls attention to the need for participation by these groups, it will provide explanations and information at meetings and hearings concerning which residents fit into these categories and where practicable it will take special steps to encourage involvement by these groups in program activities.

V. Public Hearings and Meetings

In order to obtain the views of citizens and citizen organizations and to respond to proposals and questions at all stages of the consolidated planning process and the HUD-funded programs covered by the planning process, the City will, at a minimum, conduct:

- An annual public hearing to accept citizen input on the needs of the community. At this hearing the City will provide information concerning the amount of funding expected to be available for community development and housing activities through

the HUD-funded programs as well as other identifiable sources and the range of activities that may be undertaken with those funds.

- An annual public hearing to accept citizen input on the proposed five year Consolidated Plan and one year Action Plan.
- A special public hearing in the event that additional information becomes available to the City or an increase or decrease in available funding is anticipated (e.g. a 108 Loan or a HUD recision) after the annual public hearing to accept input and provide information, which substantially affects the adopted five year Consolidated Plan and one year Action Plan.
- A public hearing to accept citizen input on the City's performance under the Consolidated Plan and the HUD-funded programs covered by the plan. This hearing will be held after the City completes its Annual Consolidated Performance and Evaluation Report, but before it submits this Report to HUD for review.
- Public meetings for the community and for neighborhoods will be conducted as needed.

VI. Reasonable and Timely Access

In order to provide citizens with reasonable and timely access to local meetings, information, and records relating to both the City's proposed and actual use of HUD funds, the City will use the following practices:

(A) To post Public Notices of meetings and public hearings at a minimum of the following locations: City Hall, the Public Library, the Altoona Housing Authority Office, City of Altoona or an advertisement in the *Altoona Mirror*. The City will also put the notice on the City of Altoona's Web Page and the City Department of Planning and Community Development at least ten (10) days prior to the date. As stated above, HUD regulations mandate a 30-day comment period prior to adoption or amendment of the Consolidated Plan and the one year Action Plan and any substantial amendment of an individual project or program and HUD regulations mandate a 15-day comment period prior to submitting the Consolidated Performance and Evaluation Report to HUD.

(B) To hold public meetings and hearings at accessible locations in the community.

(C) To provide an alternative means for input and for obtaining information if a person is unable to attend or participate in a public meeting or hearing.

(D) To post the proposed use of HUD funds for the five year Consolidated Plan, the one year Action Plan, or substantial amendment(s) at a minimum of the following locations: City Hall, the Public Library, the Altoona Housing Authority Office, and the City Department of Planning and Community Development prior to the City Council's action to approve such use or the City may choose to place an advertisement in the *Altoona Mirror*. The City will also put the notice on the City of Altoona's Web Page.

(E) To post Public Notice of the availability of the Consolidated Performance and Evaluation Report prior to its submission to HUD at a minimum of the following locations: City Hall, the Public Library, the Altoona Housing Authority Office, the City Department of Planning and Community Development or may place advertisements in the *Altoona Mirror*. The City will also put the notice on the City of Altoona's Web Page.

(F) To make available, at the Altoona City Department of Community Development, during normal working hours, for citizen review upon request, the following documents:

- All program information materials;
- Record of meetings and hearings;
- All key documents, including all prior applications, letters of approval, grant agreements, the citizen participation plan, performance reports, evaluation reports, and other reports required by HUD, and the proposed and approved Consolidated Plan and Action Plan;
- Copies of the regulations and information about the Consolidated Plan and HUD-funded programs covered by the Plan;
- Documents regarding other important program requirements such as contracting procedures, environmental policies, fair housing and other equal opportunity requirements, and relocation provisions;
- A copy of each written citizen comment or complaint about the City's performance, the City's record of actions taken and written response made to the comment or complaint.

VII. Anti-Displacement

The City will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 2; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME Programs

VIII. Amendments to the Consolidated Plan

The City shall amend its approved plan whenever it makes one of the following decisions:

- 1) Change its allocation priorities or a change in the method of distribution of funds
- 2) 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
- 3) Change the purpose, scope, location, or beneficiaries of an activity.

IX. Substantial Amendment of a Project

Prior to:

- amending the budget of a project by more than 50 percent, plus or minus;
- changing the location of a project from what was described;
- carrying out an activity not described;
- change of beneficiaries
- deletion or addition of a project

that is included in a HUD-funded program covered by the Consolidated Plan, the City will first provide citizens with a 30-day comment period on the proposed amendment. The City will consider any comments received and, if the City deems appropriate, modify or reject the amendment. The City will

make available to the public and will submit to HUD a description of any substantial amendment adopted.

X. Technical Assistance

To maximize citizen participation in the consolidated planning process and in the HUD-funded programs and projects covered by the plan, the City will, upon request, provide technical assistance to citizens and citizen organizations that represent persons of low and moderate income. Assistance may include special information meetings, meetings with technical advisors, provision of requested information, or any such assistance deemed necessary to aid in understanding and involvement. To obtain such assistance, the following office should be contacted:

City of Altoona
Department of Planning and Community Development
1301 12th Street, Suite 400
Altoona, PA 16601
Phone: 949-2470, TDD 711, FAX 949-0372

XI. Written Complaints, Grievances and Objections

At any time during the preparation or implementation of the Consolidated Plan and the HUD-funded programs covered by the Plan, citizens and citizen organizations may submit to the City written complaints, grievances or objections on any aspect of the Plan or programs. Every reasonable effort will be made to respond in writing to citizen written complaints within fifteen (15) working days. Complaints and grievances should be submitted to:

Community Development Director
Department of Planning and Community Development
1301 12th Street, Suite 400
Altoona, PA 16601
Phone: (814) 949-2470, TDD 711, FAX 949-0372

Citizen and citizen organizations may also submit to HUD written complaints, grievances or objections on any aspect of the Plan or programs. Complaints, grievances or objections should be submitted to:

Director, CPD Division
U.S. Department of Housing and Urban Development
Moorhead Federal Building
1000 Liberty Avenue
Pittsburgh, PA 15222
Phone: (412) 644-5493

XII. Accommodation

Individuals who require auxiliary aids and individuals who are non-English speaking residents and require assistance for effective participation and communication in programs and services of the City are invited to make their needs and preferences known to:

Department of Planning and Community Development
1301 12th Street, Suite 400
Altoona, PA 16601
Phone: (814) 949-2470, TDD 711, FAX 949-0372

XIII. Discrimination Prohibited

No otherwise qualified individual with a disability shall, by reason of their disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under the City's Consolidated Plan or any HUD-funded program covered by the Plan. The City will not discriminate against any individual or group because of religious creed, race, color, sex, age, ancestry, national origin, disability, or familial status in the planning, development, operation, and evaluation of the Consolidated Plan or any HUD-funded program covered by the Plan.

XIV. Changes to the Citizen Participation Plan

The City has chosen to include its Citizen Participation Plan in the Consolidated Plan document to ensure full access and accountability. Since it is part of the Consolidated Plan, it falls under the 30-day public comment period required prior to any changes, as described in Section VIII and IX.

XV. Declaration of an Emergency

When a Declaration of an Emergency has been ordered by the President of the United States, or the Governor of Pennsylvania, the City of Altoona will follow the following process concerning public hearings and public display of plans.

- If the City is unable to hold open public hearings in person, the City will be allowed to instead hold virtual public hearings through conference calls or an online video conference call platforms as long as the public is able to provide public comments during the virtual public hearing.
- If the City is not able to publicly place the plans on public display at the locations referenced in the Citizen Participation Plan, the City will put the plans on the City's website (<http://www.altoonapa.gov/>) and will also email copies of the plans to any person who will request a copy of the plans via email upon request.
- If the City Council is unable to conduct an open public forum type meeting, the City then can approve the plans at a City Council meeting through an on-line virtual City Council meeting, if an in person Council meetings are not happening because of the Emergency.

APPENDIX A

City of Altoona's Application Process

Publication of Application Schedule	City of Altoona announces annual schedule for preparation of the application for Community Development Block Grant (CDBG) and HOME Investment Partnerships Grant funds from the U.S. Department of Housing and Urban Development.
1st Community Public Hearing	City provides information on anticipated funding, eligible activities, each step in the annual application process along with dates, times and locations of meetings and actions, and accepts comments on identified community needs, programs and projects.
Neighborhood Meetings (as needed)	City provides same information as presented at 1st Community Hearing at various locations throughout the City with emphasis on presenting neighborhood-level planning and activities and gathering neighborhood views and comments on neighborhood and city needs, programs and projects and with particular emphasis on participation by persons of low income, very low income and extremely low income and persons who are residents of slum and blight and of areas in which HUD funds are proposed to be used and persons who are residents of designated revitalization or enterprise community areas, as defined by the local jurisdiction.
(Local) Application Deadline	Deadline established by the City for project requests by City residents, citizen groups, organizations, agencies, City authorities and City departments. (Application form available from the City.)
Project Selection	Planning and Community Development Staff provides City Council with a summary of all projects submitted and recommendations to select projects and assign funding allocations for the draft of the annual CDBG and HOME Programs.
Publication of Draft	City advertises a draft of the projects and funding of allocations selected by the City Council and a summary of its five year Consolidated Plan and/or one year Action Plan for a minimum 30-day comment period.
2nd Community Public Hearing	City presents the draft budget for annual funding, as advertised, and presents the five year Consolidated Plan and/or one year Action Plan application package and then accepts public comment (1) to be considered by the City Council before adoption of the final application package and (2) to be included in the final application package.
Formal Adoption	City Council Meeting to finalize the projects, budgets and application package and to vote on the resolution to adopt five year Consolidated Plan and/or one year Action Plan application.
Application to HUD	City submits its application to the U.S. Department of Housing and Urban Development, Director, CPD Division, Moorhead Federal Building 1000 Liberty Avenue, Pittsburgh, PA 15222.

APPENDIX B

CDBG

The Community Development Block Grant (CDBG) Program, was created by the Housing and Community Development Act of 1974 to provide funding to communities on a yearly basis to help meet a wide variety of needs for housing, public improvements, public services, economic development and planning. The major features of the Program are that it permits local-level decisions on how the funds will be used. That the funds must be used primarily to benefit persons of low and moderate income, and that importance is placed on citizen participation in planning, executing and judging the outcome of all projects funded by the Program.

The new Consolidated Plan requires that the community describe actions, projects and programs it intends to begin and/or complete over the next three to five years and how they may be coordinated to increase benefit to low-income, very low-income and extremely low-income residents.

The City of Altoona has participated in the Community Development Block Grant, or CDBG, Program since 1974. Before preparing its CDBG application to HUD each year the City has gathered information from the public, local government departments, authorities and for-profit and nonprofit organizations. An application is prepared and public comment is requested and reviewed before the City Council adopts the final application that is submitted to HUD. This process has been expanded to include the additional HUD programs under the Consolidated Plan.

{The HUD regulations for the CDBG Program are identified as 24 CFR Part 570, published in the Federal Register}

HOME

The HOME Investment Partnership Program was created by the National Affordable Housing Act of 1990 to expand the supply of decent, affordable housing, primarily rental housing. It is designed as a partnership among the Federal government, State and local governments and those in the for-profit and non-profit sectors who build, own, manage, finance and support low income housing.

Some of the features of the HOME Program are as follows. It can be used by a community to meet its own specific needs whether they are for new construction, tenant assistance, moderate or substantial rehabilitation or acquisition of standard housing units. It requires partnerships with non-profit developers, sponsors and owners. It requires matching funds since the HOME Program is based on the idea that low-income housing is the responsibility of all levels of government. HOME programs must be consistent with the Consolidated Plan.

(The HUD regulations for the HOME Program are identified as 24 CFR Part, 92, public in the Federal Register)

Section 108 Guaranteed Loan

Section 108 of the Housing and Community Development Act allows communities that receive CDBG funds to borrow against future annual grants. The funds are borrowed from the Federal government in the form of Section 108 Guaranteed Loans. Communities may borrow up to five times their most recent annual grant. For example, in 1994, when the City of Altoona received \$2.677 million in CDBG funds, it could borrow up to \$13.385 million in 108 Loan funds. HUD's guarantee under Section 108 enables communities to receive low interest loans at rates only slightly above the rates on obligations issued by the U.S. Treasury. It must be remembered, however, that future annual grants will be reduced by the loan repayments, possibly by a significant level depending on the size of the loan and the repayment structure.

It must also be understood that 108 Loan funds come under the HUD Certifications requirement placed on a community using CDBG funds – that at least 70% of the funds expended during the 1-,2-, or 3-year period selected by the community must benefit low and moderate income persons.

Using a 108 Loan makes it possible to finance larger, more expensive projects, or carry out a greater number of smaller activities in a shorter time period, or speed up a program or project rather than phasing it over several years. A variety of activities are eligible for 108 Loan financing. The most common is economic development, which usually involves the expansion, retention or creation of for-profit businesses.

The City of Altoona has participated in the 108 Loan Program one time, to date, in order to assist the construction of the 17th Street Expressway that extends southeastward from 12th Avenue to the City limits where it connects to the Route 220 Bypass. The \$1.5 million loan was obtained in 1981 and repaid from CDBG funds over the following seven years.

The Consolidated Plan and the Citizen Participation Plan are an integral part of the 108 Loan process. If the project(s) proposed for financing are not already addressed in the Consolidated Plan, then an amendment to the Plan is required, in accordance with the Citizen Participation Plan. The City must provide information and a public hearing process carried out before loan application is submitted. The information provided by the City must include how the funds will be used, when repayment from CDBG annual grants will begin and end and the amounts of the repayments.

APPENDIX C

ACRONYMS INCLUDED IN OR APPLICABLE TO THE CONSOLIDATED PLAN

ACPC	Altoona City Planning Commission
ADA	Americans with Disabilities Act
AIHP	American's Industrial Heritage Project
BCPC	Blair County Planning Commission
CDBG	Community Development Block Grant
DCED	Department of Community and Economic Development
DOE	Department of Energy
EDLF	Economic Development Loan Fund
EC	Enterprise Community
EZ	Empowerment Zone
CAPER	Consolidated Annual Performance Evaluation Report
HCD	Housing and Community Development
HEARTH	Homeless Emergency Assistance and Rapid Transition to Housing
HOME	-not an acronym; short name for HOME Investment Partnership Program
HOPWA	Housing Opportunities Program for Persons with AIDS
HUD	U.S. Department of Housing and Urban Development
LIHTC	Low Income Housing Tax Credits
NAP	Neighborhood Assistance Program
PHFA	Pennsylvania Housing Finance Agency
PJ	Participating Jurisdiction
SHPO	State Historic Preservation Office
UDAG	Urban Development Action Grant (abolished 1990)

APPENDIX D

CITY OF ALTOONA, PA
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
HOME INVESTMENT PARTNERSHIP PROGRAM (HOME)
FISCAL YEAR 20__ APPLICATION
(JULY 1, 20__ THRU JUNE 30, 20__)

APPLICANT/ORGANIZATION:

Name: _____

Address: _____ City: _____ State: __ Zip: _____

Email Address: _____

Contact Person: _____ Telephone: _____

Tax ID #: _____ DUNS#: _____

Non-Profit Government For-Profit

PROJECT NAME: Specific project or undertaking for which funds are being requested

PROJECT ADDRESS: Exact location, address, or area of the project

PROJECT DESCRIPTION: Summarize concisely the project for which you are requesting funds

FUNDING SOURCE REQUESTED: Check one source and report amount requested

Community Development Block Grant HOME Investment Partnership Grant

Amount Requested:\$ _____ Amount Requested:\$ _____

BUDGET INFORMATION:

List Other Funding Sources:

Funding Source	Amount	% of Total Budget
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
Total Project Funding Anticipated for FY20__	\$	100%

NATIONAL OBJECTIVE: Choose only one of the three national objectives1. **Benefit Low/Moderate Income Persons (select one)**

- Area Benefit
- Limited Clientele (Presumed , Income Eligibility , or Nature/Location)
- Housing Activity (Select one and provide unit information)
Rehabilitation New Construction

Housing Units/Households Only	Total #	# Occupied	# Low/Mod
Units at Start			
Units Expected at Completion			

- Job Creation/Retention

Number of Jobs	# Low/Mod Income Jobs	% Low/Mod Income Jobs
Created:	Created:	Created:
Retained:	Retained:	Retained:

2. **Prevent or Eliminate Slums or Blight (select one)**

- Spot Blight Area Blight

3. **Urgent need (select one)**

- Serious, Immediate Threat Critical within 18 Months
 Limited to Urgent Condition Local/Other Funds Insufficient

OTHER PROJECT INFORMATION: (Project management, critical benchmarks, timeframe)

OUTCOME PERFORMANCE MEASUREMENT: (select one objective and one outcome)

1. **Objective:**

- Suitable Living Environment
- Decent Affordable Housing
- Creating Economic Opportunities

Describe how the project addresses the objective selected above:

2. **Outcome:**

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

Describe how the outcome selected above benefits the community/people served:

3. **Outcome Indicator:**

Enter the outcome indicator that best describes the data that will be collected and reported as project outcomes. Provide a description of the measurement reporting tool or evaluation process that will be utilized to determine project outcome (i.e. client surveys, statistical data from a verifiable source, etc.):

PRIMARY PURPOSE:

Is the Primary Purpose of the activity to...

Help Persons with Disabilities? Yes No

Will the activity generate Program Income? Yes No

SECTION 504 AMERICANS WITH DISABILITY ACT

Is the location of the project or building accessible to persons with disabilities?

Yes No