



City of Springfield, Missouri

Citizen Participation Plan

Originally Adopted on July 30, 2018 Pursuant to
City Council Special Ordinance 27087

Amended for Disaster / Emergency Response
on June 1, 2020 Pursuant to City Council
Special Ordinance 27326

CITIZEN PARTICIPATION PLAN - COVID-19 AMENDMENTS

- Include virtual hearings as an allowed method for citizen participation;
- Update section on a disaster / emergency response would not require a substantial amendment;
- Provide details on possible actions, including reprogramming of funding and types of possible activities that may be undertaken in response to the COVID-19 pandemic;
- Includes provisions relative to Consolidated Plan citizen participation, Community Development Block Grant and HOME Investment Partnership funds
- Grant waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;
- 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.

OVERVIEW

The Citizen Participation Plan (CPP) is the process by which the City of Springfield identifies the policies and procedures to be used to encourage citizen participation and involvement in programs and activities under the U.S. Department of Housing and Urban Development (HUD) Five-year Consolidated Plan. The Five-year Consolidated Plan identifies the City's housing, homeless, community and economic development needs and establishes goals and strategies for addressing those needs, including the use of Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds. The Citizen Participation Plan sets forth the mutual rights, duties and responsibilities of both the City and participating citizens and citizens' groups.

HUD PROGRAMS

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

1. **Community Development Block Grant Program (CDBG)**

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

2. **HOME Investment Partnerships Program (HOME)**

HOME was introduced in the Cranston-Gonzalez National Affordable Housing Act of 1990 and provides funding for housing rehabilitation, new housing construction, acquisition of affordable housing, and tenant-based rental assistance.

LEAD AGENCY

The Planning & Development Department is designated by the Springfield City Council as the lead agency for the administration of the CDBG and HOME grant programs. Through the U.S. Department of Housing and Urban Development (HUD) the Planning & Development Department administers the CDBG and HOME programs. As the lead agency for HUD, the Planning & Development Department is responsible for developing the 5-Year Consolidated, Annual Action Plans, the Consolidated Annual Performance Evaluation Report (CAPER) and amendments to the Citizen Participation Plan.

Copies of this Citizen Participation Plan (CPP) can be obtained at any Springfield Branch of the Springfield-Greene County Library or on the City's website at <https://www.springfieldmo.gov/850/Document-Library>.

ENCOURAGING PUBLIC PARTICIPATION

The City of Springfield encourages all citizens to participate in the development and review of the:

- HUD Five-Year Consolidated Plan
- Annual One-Year Action Plan (AAP)
- Substantial Amendments to the Consolidated Plan and/or the Annual Action Plan
- Consolidated Annual Performance and Evaluation Report (CAPER)
- Assessment of Fair Housing Plan (AFH)
- Amendments to the Citizen Participation Plan (CPP)

Citizens will be given reasonable notice and an opportunity to participate in the development of all Consolidated Plans, Annual Action Plans, Substantial Amendments, CAPERs and Amendments to Citizen Participation Plans.

Although the City encourages the participation of all of its citizens, the emphasis of this Plan is on encouraging and ensuring the participation of low- and moderate-income persons, particularly those living in slum and blighted areas, residents of predominantly low- and moderate-income neighborhoods, minorities, non-English speaking persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons/agencies and residents of public and assisted housing developments. The City also encourages the participation of local and regional institutions, the local Continuum of Care (i.e. Ozarks Alliance to End Homelessness), other organizations (including business, developers, non-profit organizations, philanthropic organizations, and community and faith-based organizations), residents of public and assisted housing (including any resident advisory boards, resident councils, and resident management corporations) and by other low- income residents of targeted revitalization areas in which public and assisted housing is located. Persons needing special accommodations when attending any City meeting will be required to notify the City Clerk's office at (417) 846-1443 at least three (3) days prior to a scheduled meeting.

In preparing the components of the Consolidated Plan, the AFH and any amendments to the CPP the City of Springfield shall consult with other public and private agencies that provide housing, health services, and social services, community-based and regionally-based organizations that represent protected class members, organizations that enforce fair housing laws, broadband internet service providers including organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include management of flood prone areas, public land or water resources, emergency management agencies, local health and child welfare agencies, business and civic leaders, adjacent units of general local government, regional government organizations local and regional institutions, the local Continuum of Care (i.e. Ozarks Alliance to End Homelessness), residents of public and assisted housing and by other low- income residents of targeted revitalization areas in which public and assisted housing is located. Direct and email consultations shall be held by City Staff with various groups and organizations as enumerated within the Notification and Consultation Lists chapter that follows.

CITIZEN INVOLVEMENT

The City of Springfield shall provide for citizens' comment, input and participation throughout the process by various means:

1. The City shall make CDBG & HOME funding information available to citizens, public agencies and other interested parties, as outlined in the Notifications & Consultations List.
2. Consultation with several specific groups and agencies as enumerated within the Notification and Consultation List Chapter as follows.
3. Published Comment Periods
4. Citizens' Advisory Committee for Community Development (CACCD) Public Hearings
5. Springfield City Council Public Hearings

NOTIFICATION OF INPUT OPPORTUNITIES

The City of Springfield will provide a variety of notifications highlighting citizen input opportunities, including the use of social media, direct communications to organizations and meetings with agencies serving target populations.

CITIZEN REPRESENTATION

CITIZEN ADVISORY COMMITTEE FOR COMMUNITY DEVELOPMENT (CACCD)

The Citizens' Advisory Committee for Community Development (CACCD) is an appointed body. The Committee reviews City staff assessments and recommendations on the CDBG program with the staff and submits comments to the City Council. The CACCD shall base its comments to the City Council solely on an objective basis and in conformance with adopted policies, procedures and priorities of the City Council and federal Community Development Block Grant (CDBG) requirements. The Committee shall avoid ex parte communications with applicants regarding the application or CDBG program during the process of deliberation, to avoid a conflict of interest or an appearance of impropriety.

It shall be the charge of the CACCD to avoid any individual or collective conflict of interest or any appearance of impropriety or conflict of interest. A Committee member shall not be affiliated with any organization at the time an application for CDBG funds is made, or within a twelve (12) month period preceding application. Affiliation is defined to mean serving as a board, committee or general member, a member of staff or involved in fund raising activities. If such a conflict exists, the Committee member shall no longer serve on the Committee.

The membership of the CACCD shall consist of nine (9) members, each with three (3) year terms, who shall be appointed by the City Council. Appointments shall be staggered so that there will be three terms which expire each year. All members of the CACCD shall be legal residents of the City of Springfield, Missouri.

MAYOR'S COMMISSION ON HUMAN RIGHTS AND COMMUNITY RELATIONS (MCHRCR)

The Mayor's Commission on Human Rights and Community Relations (MCHRCR) is an appointed body which works to promote understanding and respect among all citizens and provides the community recourse for discriminatory acts. The chief responsibility of the MCHRCR is to investigate alleged incidents of discrimination and mediate settlements between affected parties. The MCHRCR acts as a clearing house for information regarding human rights and offers its services to help educate interested citizens and community groups. The MCHRCR will be consulted concerning issues that fall within their purview.

NEIGHBORHOOD ADVISORY COUNCIL (NAC)

The Neighborhood Advisory Council (NAC) is an advisory board, created to increase communication between organized neighborhood associations, City Council and City staff. Although the NAC is not tasked specifically with the review of the City's HUD funded programs, the City shall provide a copy of the HUD plans and reports to the membership via direct email solicitation, to allow the organization an opportunity to review and comment and to provide representatives the opportunity to share this information with their many neighborhood association members. NAC represents all neighborhood associations within the City, including low- and moderate-income neighborhoods and slum and blighted areas.

NOTIFICATION and CONSULTATION LISTS

The City of Springfield has an ongoing listing of groups and organizations that are sent direct emails regarding affordable housing openings and other notifications. The City staff shall work in conjunction with the CACCD and the MCHRCR to consult directly with these groups and organizations, in preparing the components of the Consolidated Plan, the AFH and any amendments to the CPP. Where possible, the City staff shall meet in person with a number of groups and organizations on an annual basis. The City shall also provide a copy of the HUD plans and reports to the notification lists via a direct email solicitation. These lists include people and organizations that represent low- and moderate-income persons, persons living in slum and blighted areas, residents of predominantly low- and moderate-income neighborhoods, minorities, non-English speaking persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons/agencies, residents of public and assisted housing developments, local and regional institutions, and other organizations. Groups and organizations wishing to be added to the HUD Program Notification and Consultation list, may contact the City's Planning & Development Department, at any time, to be added to the listing. Examples of specific groups and agencies have been enumerated below:

HUD PROGRAM NOTIFICATION AND CONSULTATION LIST

- Abilities First (Development Disabilities Organization)
- Affordable Housing Action Board (AHAB)
- AIDS Project of the Ozarks
- Boys & Girls Town of Missouri
- Burrell Mental Health Center
- Community Partnership of the Ozarks
- Cox Health Center (Hospital)
- Easy Living, Inc. (Development Disabilities Organization)
- Family Violence Center
- Good Samaritan Boys Ranch
- Greene County Children's Division
- Grupo Latinoamericano
- Habitat for Humanity
- Hand-in-Hand Multicultural Center
- Housing Authority of Springfield (HAS)
- Jordan Valley Community Health Center
- Legacy Counseling, LLC
- Missouri Career Center
- Missouri Department of Health and Senior Services
- NAACP
- Numerous Local Churches
- Ozarks Alliance to End Homelessness (Continuum of Care)
- Recovery Outreach Services
- Southwest MO Center for Independent Living
- Springfield Community Center
- Springfield Community Land Trust (SCLT)
- Springfield Public Schools
- The African American Agenda Collaborative
- The Arc of the Ozarks (Development Disabilities Organization)
- The Salvation Army
- Veteran's VASH Program
- Veterans Coming Home
- Women Infants & Children (WIC)

*Please note that this is not a comprehensive list.

LOCAL AND REGIONAL INSTITUTIONS

- Chamber of Commerce
- Community Collaboratives
- Community Foundation of the Ozarks
- Council of Churches
- Missouri Job Center
- Ozarks Transportation Organization
- The Fairbanks
- United Way of the Ozarks

*Please note that this is not a comprehensive list.

Who are residents of predominantly low- and moderate-income neighborhoods in Springfield?

People who live in continuous areas bound by roads or natural features (creeks, etc.) where more than half of the area's residents fall below HUD's "moderate income" guidelines are considered residents of predominantly low- and moderate-income neighborhoods for the purposes of this plan.

CONSOLIDATED PLAN

A Consolidated Plan with a housing and non-housing component shall be adopted by the City Council to survey needs, establish priorities and govern in the selection of projects. This plan shall cover a period of five (5) years. It shall identify the City's housing, homeless, community and economic development needs and specify short-term and long-term objectives for CDBG funding, HOME funding, as well as funding for programs and projects from other resources.

There are several requirements included as a part of this plan to encourage citizen participation in the development of the Consolidated Plan. Initially, the City shall make available to citizens, public agencies, and other interested party's information that includes the amount of assistance the jurisdiction expects to receive including grant funds and program income and the range of activities that will be undertaken. This shall also include the estimated amount that will benefit persons of low-and-moderate income households. Even though the City expects no displacement to occur, the City will make every effort to minimize displacement of persons and to assist any persons displaced. The City's Consolidated Plan shall state the types and levels of assistance the City will make available (or require others to make available) to persons displaced. This information shall be disclosed via an advertisement in the local newspaper, on the City's website and pushed out via social media. The Consolidated Plan shall be adopted prior to the allocation process for the initial year covered under the identified program period, at the discretion of the City Council. There shall be an annual Action Plan for each incremental year of the Consolidated Plan. To reach this goal, the City shall complete the following items:

1. In developing the Consolidated Plan, the City staff shall consult with other public and private agencies representing community development and housing needs within the City of Springfield, wherever possible.
2. Publish a statement of intent and notice of public hearing in the local newspaper of greatest circulation at least fifteen (15) days prior to the public hearing of the Citizens' Advisory Committee for Community Development. The statement of intent shall reference the method of access to HUD related data.
 - a. Further notification shall be provided via the City's website and social media.
3. Hold a public hearing of the Citizens' Advisory Committee for Community Development; inviting input on the Needs Assessment, Proposed Activities, and Strategy portions of the Consolidated Plan.

There are several areas that will specifically be included in the citizen participation aspect of the process as follows:

- a. Lead-based Paint -- When preparing the portion of the Consolidated Plan, the City shall 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.
 - b. Priority Non-Housing Needs -- When preparing the description of the non-housing priority needs, the City shall consult with adjacent local governments when possible or applicable for needs and services that involve multiple jurisdictions.
 - c. Public Housing -- When preparing the housing section of the Consolidated Plan, the City shall consult with the local public housing authority to identify needs and strategies to address those needs.
4. Provide information to social service agencies, churches, housing agencies, and other not-for-profit organizations regarding the program and invite input. Once the draft Consolidated Plan is completed, the City shall make the document available to the general public and provide reasonable opportunity for organizations to examine the content and provide comment on the Plan. To reach this goal, the City shall complete the following steps:
- a. Publish a summary of the draft Consolidated Plan in the local newspaper of greatest circulation inviting public comment for a period no less than thirty (30) calendar days.
- This summary shall include, at minimum, the purpose and contents of the draft Consolidated Plan and shall include a list of the locations where copies of the entire proposed Consolidated Plan may be examined. Additionally, the Plan shall be made available electronically to citizens or organizations requesting copies. A reasonable number of hard copies shall be provided, at no cost, to citizens or agencies that do not have electronic viewing capabilities.
- b. A copy of the Consolidated Plan will be made available on the City of Springfield's website. Notification of this placement shall be provided via social media outlets.
 - c. Make copies of the proposed Consolidated Plan available at public libraries, government offices, and other public places.

The City's Planning & Development Department shall consider all comments which are received in writing or orally at the public hearing in preparing the final Consolidated Plan. To accomplish this goal, the City shall prepare a summary of public comments received and a summary of any comments not accepted into the plan and the reasons therefore, which shall be incorporated as a part of the final Consolidated Plan.

- 5. To involve the affected public in the citizen participation process, one public hearing shall be held before the City Council with notice published in a newspaper of general circulation.

ANNUAL ACTION PLAN

The Annual Action Plan is a one (1) year plan that implements initial elements of the Consolidated Plan. The Annual Action Plan includes funding priorities and anticipated accomplishments from each project. There are several requirements included as a part of this plan to encourage citizen participation in the development of the Annual Action Plan. The City initially shall make available to citizens, public agencies, and other interested parties information that includes the amount of assistance the jurisdiction expects to receive including grant funds and program income and the range of activities that will be undertaken. This shall also include the estimated amount that will benefit persons of low-and-moderate income households. All parties or organizations known to have an interest in submitting potential projects for funding shall be contacted in writing and provided access to appropriate materials for making application for the funds available. The City shall complete the following steps:

1. Publish a Public Announcement and Proposal Solicitation on an annual basis in the local newspaper of greatest circulation, seeking proposals for Discretionary CDBG funding at least fifteen (15) days prior to the public hearing.
 - a. Further notification shall be provided via the City's website and social media.
2. Following the receipt of proposals, a joint, public hearing shall be held before the City Council and the Citizens' Advisory Committee for Community Development. This hearing shall be held for reviewing proposals and public review and comment on Proposed Activities.
3. The CACCD shall hold a public hearing to allow the Committee to review the City staff assessment and recommendations on the CDBG program with the staff and submit comments to the City Council.
4. Once the draft Annual Action Plan is completed, the City shall make the document available to the general public and provide reasonable opportunity for organizations to examine the content and provide comment on the Plan. To reach this goal, the City shall complete the following items:
 - a. Publish a summary of the Annual Action Plan in the local newspaper of greatest circulation inviting public comment for a period no less than thirty (30) calendar days. Further notification shall be provided via the City's website and social media.
 - b. Make copies of the proposed Annual Action Plan available at public libraries, government offices, and other public places. This summary shall include, at minimum, the purpose and contents of the Annual Action Plan and shall include a list of the locations where copies of the entire proposed Annual Action Plan may be examined. Additionally, the Plan shall be made available electronically to individuals or organizations requesting copies. A reasonable number of hard copies shall be provided to citizens or agencies that do not have electronic viewing capabilities.

5. The City shall consider all comments which are received in writing or orally at the public hearings in preparing the final Annual Action Plan. To accomplish this goal, the City shall prepare a summary of public comments received and a summary of any comments not accepted into the plan and the reasons therefore, which shall be incorporated as a part of the final Annual Action Plan.
6. The City Council shall hold a public hearing prior to the submission of the Annual Action Plan to HUD. The purpose of this public hearing shall be to offer an additional opportunity for citizen comment and participation.

Once the citizen participation and public comment period has been completed, the City will submit the final Annual Action Plan at least forty-five (45) days before the start of the program year.

CONSOLIDATED PLAN AND ANNUAL ACTION PLAN AMENDMENTS

SUBSTANTIAL CHANGE

It shall be considered a substantial change in objectives and projected use of funds described in the Action Year Plan whenever the City adds a new activity; materially changes the scope, purpose, location or beneficiaries of an activity; or, adjusts the CDBG budget by an amount exceeding 10% of the total amount of available funds for the program year.

PROCESS FOR AMENDMENT

Once a need for a substantial change has been determined, the City will adhere to the following procedure:

1. Publish a statement of intent and notice of public hearing in the local newspaper of greatest circulation at least fifteen (15) calendar days prior to the date of the public hearing.
 - a. Further notification shall be provided via the City's website and social media.
2. The Citizens' Advisory Committee for Community Development shall hold a public hearing inviting input regarding the proposed amendment.
3. Accept public comments for a period not less than thirty (30) calendar days on the substantial amendment following the public hearing. Any comments received either written or orally at the public hearing and during the thirty-day (30) comment period shall be considered in preparing the substantial amendment. A summary of these comments or views and a summary of the views not accepted and the reasons therefore shall be attached to the final amendment.
4. The draft amendment shall be presented to the City Council for adoption by ordinance.

NON-SUBSTANTIAL CHANGE

A non-substantial change is defined as any change or alteration that will not constitute a substantial change as defined above under SUBSTANTIAL CHANGE. Examples of non-substantial change may include cancellation of a previously approved activity due to unforeseen circumstances that have caused significant delays or unreasonable cost burdens, removal and reallocation of funds remaining after an activity is completed as approved and increase of activity budget to make up the shortage to secure a contract. The City (Grantee) Staff responsible for overseeing and managing the CDBG Program will have authority to approve and implement non-substantial changes on an as-needed basis as part of the CDBG program administration.

DISASTER/EMERGENCY RESPONSE WOULD NOT REQUIRE A SUBSTANTIAL AMENDMENT

There have been situations that occur where the City experiences a natural disaster or emergency. Examples of these include the 1993 Ferguson Sinkhole Flood, the Ice Storm of 2007 and the 2020 COVID-19 virus pandemic. In these situations, either the Director of the Springfield-Greene County Health Department, the Mayor of Springfield, Greene County Presiding Commissioner, the Governor of the State of Missouri, and/or the President of the United States declared that emergency conditions existed. These events are not predictable as to when they will occur or what will be their impact on Springfield's residents, businesses, and/or the community resources.

Events that qualify as a type of disaster or emergency would *not* constitute a substantial change, and thereby waive requirements for formal adoption of an amendment to the associated Consolidated Plan/Annual Action Plan. In the event of a local, state, or federal disaster or emergency declaration for Springfield, the City may fund new activities and/or the reprogram funds, including canceling activities, to meet needs resulting from said disaster or emergency.

Therefore, the City of Springfield may utilize CDBG or HOME funds to meet these needs with a five (5) day public notice and comment period instead of a thirty (30) day public comment period, which is otherwise required for substantial amendments. For CDBG funding under FY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), the City of Springfield may provide a five (5) day notice of a proposed off-cycle change beginning April 8, 2020 as allowed under a HUD waiver.

With respect to a declared disaster, the City may elect to use CDBG or HOME funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal or local sources unless allowed by the federal government. Potential eligible uses of funds are those that are included in this Citizen Participation Plan, the Consolidated Plan, or any other CDBG or HOME eligible use. HUD may provide new guidance on eligible uses in which the City will comply with and may utilize as well.

WAIVER PROCESS

Upon determination of good cause, HUD has the authority to waive certain regulatory provisions of the CDBG, HOME, ESG and HOPWA programs subject to statutory limitations.

Examples of good cause for such waivers:

1. Presidential disaster declarations under Title IV of the Stafford Act.
2. The City of Springfield may seek a waiver to its Citizen Participation Process, in emergency situations when expedited assistance offered through Consolidated Plan/Annual Action Plan covered programs is deemed necessary by the Mayor.
3. HUD issues notices to waive deadlines for submission and reduction of public comment periods

Following HUD issuance of waiver notices or approval of a waiver requests, the City reserves the right to amend the Citizen Participation Plan comment period as follows:

1. A reduction in the public comment period for Consolidated Plan/Annual Action Plan substantial amendments from thirty (30) calendar days to five (5) calendar days.
2. A reduction in the public comment period from thirty (30) calendar days to five (5) calendar days in the event of a local “urgent needs” emergency or state/federally declared disaster.
3. Flexibility in determining what constitutes reasonable notice and opportunity to comment.
4. Forego public hearings when the emergency conditions dictate caution; however, the City, at its option, may hold virtual public hearings if determined to be necessary.

AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH) & ASSESSMENT OF FAIR HOUSING (AFH) PLAN

On March 14, 2016, the U.S. Department of Housing and Urban Development (HUD) issued a notice providing guidance to cities incorporating the 24 CFR Part 5 Affirmatively Furthering Fair Housing (AFFH) rule into the requirements of 24 CFR 91.10 – Consolidated Program Year and 24 CFR 91.115 – for the Citizen Participation Plan. The new AFFH rule requires cities to set forth a meaningful and transparent process to identify and understand local and regional fair housing issues and set goals for improving fair housing choice and access to opportunity.

On January 5, 2018 a Federal Register Notice was published by HUD (83 Fed. Reg. 683) extending the deadline for submission of the Assessment of Fair Housing for Consolidated Plan Participants to their next AFH submission date that falls after October 30, 2020.

As soon as feasible, the City shall make available to citizens, public agencies, and other interested party's HUD-provided data and any other supplemental information the local government plans to incorporate into the AFH.

To allow for the sharing of resources and addressing fair housing issues from a broader perspective, the City of Springfield may collaborate with the Housing Authority of the City of Springfield (HAS) in conducting and submitting a single, joint AFH. If possible, the City will continue to collaborate with HAS and any other Public Housing Authority that may exist in the future.

The goal of the AFFH rule is to utilize local and regional data to better understand fair housing issues and to establish fair housing priorities and goals. Such data is intended to make participants better able to evaluate fair housing issues, including: segregation, conditions that restrict fair housing choice, and disparities in access to housing and opportunity. To reach this goal, the City, shall complete the following steps:

1. The City staff shall consult with the Mayor's Commission on Human Rights and Community Relations (MCHRRCR) concerning items that would fall within their purview.
2. The City Staff will consult directly with a wide array of public and private agencies. Examples of agencies that will be consulted are enumerated within the *Notification and Consultation Lists* Section. These consultations shall take place throughout the AFH process.
3. Publish a statement of intent and notice of public hearing in the local newspaper of greatest circulation at least fifteen (15) days prior to the public hearing.
 - a. Further notification shall be provided via the City's website and social media.
4. Hold a public hearing by the Citizen's Advisory Committee for Community Development inviting input on fair housing issues and needs.
5. Provide information to social service agencies, churches, housing agencies, and other not-for-profit organizations regarding the AFFH rule and the AFH plan and invite input.

- a. Publish a summary of the draft Assessment of Fair Housing Plan in the local newspaper of greatest circulation inviting public review and comment for a period no less than thirty (30) calendar days. This summary shall include, at minimum, the purpose and contents of the draft AFH Plan and shall include a list of the locations where copies of the entire proposed AFH Plan may be examined. Additionally, the Plan shall be made available electronically to citizens or organizations requesting copies. A reasonable number of hard copies shall be provided, at no cost, to citizens or agencies that do not have electronic viewing capabilities.
 - b. A copy of the AFH Plan will be made available on the City of Springfield's website. Notification of this placement shall be provided via social media outlets.
 - c. Make copies of the proposed AFH Plan available at public libraries, government offices, and other public places.
6. To involve the affected public in the citizen participation process, one public hearing shall be held before the City Council with notice published in a newspaper of general circulation.
 7. Any comments received either written or orally at the public hearing and during the thirty-day (30) comment period shall be considered in preparing the AFH Plan. A summary of these comments or views and a summary of the views not accepted and the reasons therefore shall be attached to the final amendment.

Once the citizen participation and public comment period have been completed, the City of Springfield will submit the final City council-approved Assessment of Fair Housing Plan to the U.S. Department of Housing and Urban Development (HUD).

REVISIONS TO AFH PLAN

A HUD accepted AFH must be revised and re-submitted to HUD for review when:

1. A material change occurs. A material change is one that both a) impacts the circumstances in the City which may include natural disasters, significant demographic changes, new significant contributing factors, and civil rights findings and b) causes alterations to the AFH's analyses, contributing factors, priorities, and/or goals.
2. The City receives a written notification from HUD specifying a material change to the regulations.

PROCESS FOR REVISION OF AFH PLAN

Once a need for a revision of the AFH Plan has been determined, the City will adhere to the following procedure:

1. Publish a statement of intent and notice of public hearing in the local newspaper of greatest circulation at least fifteen (15) calendar days prior to the date of the public hearing.
 - b. Further notification shall be provided via the City's website and social media.
2. The Citizens' Advisory Committee for Community Development shall hold a public hearing inviting input regarding the proposed revision.
3. Accept public comments for a period not less than thirty (30) calendar days on the revision following the public hearing. Any comments received either written or orally at the public hearing and during the thirty-day (30) comment period shall be considered in preparing the revision of the AFH Plan. A summary of these comments or views and a summary of the views not accepted and the reasons therefore shall be attached to the revision. The draft revision shall be presented to the City Council for adoption by ordinance.
4. The draft revision shall be presented to the City Council for adoption by ordinance.

PERFORMANCE REPORTS

The final aspect of citizen participation is regarding the performance of the program. The City will adhere to the following process:

1. Publish a public notice regarding the availability of the CAPER and public hearing in the local newspaper of greatest circulation at least fifteen (15) calendar days prior to the public hearing.
 - a. Further notification shall be provided via the City's website and social media.
2. The Citizens' Advisory Committee for Community Development shall hold a public hearing inviting input regarding the final performance report, officially titled Consolidated Annual Performance and Evaluation Report (CAPER), for the previous program year. This public hearing shall be held annually not more than ninety (90) calendar days after the completion of the most recent program year, which shall outline the status of all activities as of the end of the Program Year.
 - a. Any comments received either written or orally at the public hearing shall be considered in preparing the final performance report. A summary of these comments or views and a summary of the views not accepted and the reasons therefore shall be attached to the final report.

DISPLACEMENT

The City of Springfield does not intend to undertake any activities funded by the U.S. Department of Housing and Urban Development (HUD) that would cause either temporary or permanent displacement of an individual or family. However, the City is required to have a Plan in place should such an event occur.

The Plan contains three major components.

1. One-For-One Replacement of Low and Moderate-Income Dwelling Units

All occupied and vacant low- and moderate-income dwelling units that are demolished or converted to a use other than as low-and-moderate-income housing as a direct result of any activity assisted under the Section 104(d) of the Housing and Community Development Act of 1974, as amended, will be replaced with low and moderate-income dwelling units within three years of commencement of the activity.

2. Relocation Assistance

The City of Springfield will ensure that relocation assistance is provided as described in 24 CFR 507.606 to each low to moderate-income person who is displaced by the demolition or by the conversion of a low/moderate income dwelling unit to another use as a direct result of a CDBG assisted activity. When needed, relocation notices will be distributed to the affected persons in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

3. Steps to Minimize Displacement

City of Springfield will take the following steps to minimize the involuntary displacement of low-and moderate-income persons when CDBG funds are involved:

- a. All CDBG applications will be reviewed to determine whether involuntary displacement is likely to occur. Those applications involving displacement will receive a lower priority recommendation for funding unless it can be shown that alternatives are not available.
- b. Applicants who utilize CDBG funds to rehabilitate or convert a lower-income unit to a non-residential use will be required to supply replacement housing as well as relocation assistance.
- c. The cost of any required relocation assistance and the provision of replacement housing will be borne by the applicant.

The City will also use the applicable HUD Brochures to inform residents/ businesses of their rights.

GENERAL PROCESS

PUBLIC HEARINGS

The following procedures shall be followed regarding public hearings:

1. No less than fifteen (15) calendar days' notice will be provided to the public for a public hearing.
2. Public hearings shall be advertised in the local newspaper of greatest circulation. The notice will include adequate information regarding the subject of the hearing to encourage informed comment.
 - a. Further notification shall be provided via the City's website and social media.
3. All public hearings shall be held at times and locations convenient to potential attendees. Meeting times will generally avoid normal business hours (8-5 M-F) and be accessible to persons with disabilities including access to public transit. The following policy statement is printed near the bottom of every appointed board, committee and City Council meeting agenda, "In accordance with ADA and LEP guidelines, persons needing special accommodations when attending any City meeting will be required to notify the City Clerk's office at (417) 864-1443 at least three (3) days prior to the scheduled meeting."
 - a. Together the hearings shall address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH, and a review of program performance.
4. If a public hearing is planned and it can be reasonably anticipated that a significant number of non-English speaking participants will be in attendance, the City will provide a translator for the meeting.
5. A copy of the Consolidated Plan, the Annual Action Plan, any Substantial Amendments to the Consolidated Plan and the Annual Action Plan, the CAPER, and Amendments to the Citizen Participation Plan will be provided to the City's Notification List and to the full membership of the Neighborhood Advisory Council (NAC) or other similar group via a direct email solicitation; seeking additional public review and comment.

LANGUAGE ASSISTANCE PLAN

Pursuant to CFR 24 §91.105 the City of Springfield is required to take appropriate actions to encourage the participation of all its citizens, including minorities, non-English speaking persons, and persons with disabilities. This section refers specifically to non-English speaking persons, defined in The Fair Housing Act as Limited English Proficiency (LEP) persons. LEP refers to a person's limited ability to read, write, speak or understand English. Per an analysis performed by the Ozarks Transportation Organization (OTO) as a part of the August 17, 2017 *OTO Limited English Proficiency Plan* (LEPP) 1.89% of Greene County's total population (5+ years of age) speak English less than "Very Well". The report also concludes that 5.23% of the County's population (5+ years of age) speak a language other than English at home. The staff of the City of Springfield understands the need to continually consult with the community regarding its changing language assistance needs.

IDENTIFYING LEP PERSONS NEEDING LANGUAGE ASSISTANCE

1. City staff will have on hand the "I speak" cards printed from the following website <http://www.lep.gov/ISpeakCards2004.pdf>.
2. Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings
3. A notice shall be posted on CACCD, Mayor's Commission and City Council agendas indicating that language assistance is available.

LANGUAGE ASSISTANCE MEASURES

1. The City of Springfield has a contract with a local interpretation services company that can provide on demand translation services as needed for a fee. Relay Missouri offers Spanish Relay service. Relay users can type in Spanish and the conversations will be relayed in Spanish. Voice users can speak Spanish to the relay user. Spanish to English Translation is offered. Users must dial 1-800-548-8317 (TTY/ASCII/Voice).
2. There are several Universities and Colleges in Springfield, Missouri that have foreign language departments. These could also be used as a resource if need be. Currently, none of the City of Springfield's documents are available in a language other than English. However, the City's website may be translated into many different languages using Google Translate.

ACCESS TO RECORDS

The City shall ensure that citizens, public agencies, and other interested parties have reasonable and timely access to information and records pertaining to the City's Consolidated Plan and projects for a minimum of the preceding five (5) years.

Copies of the City's Consolidated Plan, Annual Action Plan, Performance Reports (CAPER), Assessment of Fair Housing (AFH) Plan, Citizen Participation Plan (CPP) and any substantial amendment of said documents will be available at any Springfield Branch of the Springfield-Greene County Library or on the City's website at <https://www.springfieldmo.gov/850/Document-Library>.

Information and records will be available to the public in a form accessible to persons with disabilities, upon request. Braille and/or large print copies will be available, depending upon the needs of the requestor.

TECHNICAL ASSISTANCE

The City shall provide two (2) technical assistance sessions per program year to provide guidance to groups representative of low- and moderate-income persons in developing proposals and completing necessary proposal forms for assistance under the formal CDBG allocation process. The initial technical assistance meeting is held immediately after the solicitation for discretionary public service projects. The second technical meeting is held with the sub grantees that have been selected for CDBG funding for public service projects. A direct email solicitation is sent out for both technical meetings.

COMPLAINTS

Should a citizen complaint be received regarding the Consolidated Plan, Annual Action Plan, Plan Amendments, Performance Reports, or the Citizen Participation Plan, the City will adhere to the following process:

1. Complaints must be submitted in writing to the Planning & Development Department of the City of Springfield.
2. Where practicable, all complaints will be initially responded to in writing within fifteen (15) working days from the date of receipt of the complaint.