

## Appendix A: Citizen Participation Plan

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### *Montana Citizen Participation Plan 2015 – 2019 Consolidated Plan*

#### *Introduction*

In 1994, the U.S. Department of Housing and Urban Development issued new rules consolidating the planning, application, reporting, and citizen participation processes of three formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships (HOME), and Emergency Shelter Grants (ESG). The new single-planning process was intended to more comprehensively fulfill three basic goals: to provide decent housing, to provide a suitable living environment and to expand economic opportunities.

Provision of decent housing may involve assisting homeless persons in obtaining appropriate housing, retaining and improving the affordable housing stock, increasing the availability of permanent or transitional affordable housing for low-income households without discrimination or increasing supportive housing to assist persons with special needs. Providing a suitable living environment might entail improving the safety and livability of neighborhoods, including the provision of adequate public or community facilities; de-concentrating housing opportunities and revitalizing neighborhoods; restoring and preserving natural and physical features with historic, architectural, and aesthetic value; and conserving energy resources by promoting planning and thoughtful design. Expanding economic opportunities can involve creation of accessible jobs, providing access to resources for community development, assisting low-income persons in achieving self-sufficiency, and fostering a competitive workforce.

The Consolidated Plan is actually a three-part planning process required by HUD. It comprises developing a five-year strategic plan, preparing annual action plans and submitting annual performance reports to construct the framework whereby Montana can identify its housing, homeless, community, and economic development needs. This process helps identify resources that will be employed and actions to be taken that will address the needs, as well as review and evaluate the State's progress toward achieving its strategic goals. Completing these documents on time and in a manner that is acceptable to HUD ensures program funding.

The precursor to the Consolidated Plan is the Citizen Participation Plan (CPP). The objectives of the CPP are to ensure that the citizens of Montana, particularly persons of low and moderate income, persons living in slum and blight areas, units of local government, housing agencies and other interested parties, are provided the opportunity to participate in the planning and preparation of the Consolidated Plan, including amendments to the Consolidated Plan and the Annual Performance Report. In doing so, the CPP sets forth general policies and procedures for implementing and carrying out the Consolidated Planning Process, such as how the Consolidated Plan will be developed, dates and milestones along which the process will proceed, and methods for citizens to offer the State assistance and guidance in the formulation of the Plan. Furthermore, the provisions of the CPP fulfill statutory and regulatory requirements for citizen participation specified in the U.S. Department of Housing and Urban Development's rules for the Consolidated Plan, the HOME, CDBG, and ESG programs. In Montana, the participation process will be developed and monitored by a Consolidated Plan Coordinating Committee consisting of representatives from the Montana Department of Commerce (Commerce) and the Montana Department of Public Health and Human Services (MDPHHS)

#### *Purpose of the Citizen Participation Plan*

In order to ensure maximum participation in the Consolidated Plan process among all populations and needs groups, and in order to ensure that their issues and concerns are adequately addressed, the State of Montana followed the standards set forth in this Citizen Participation Plan during development of its Consolidated Plan

documents including: 5-Year Consolidated Plan, Annual Action Plans prepared during the five year period and Consolidated Annual Performance, Evaluation Report (CAPER) documenting the State's performance during the five year period of the Consolidated Plan, and the Citizen Participation Plan.

The Citizen Participation Plan also provides citizens an opportunity to evaluate and comment on the State's Consolidated Plan documents, including this Citizen Participation Plan. Alternative formats of the Consolidated Plan documents are available upon request.

Citizens were invited to provide comments on all documents required under the Consolidated Plan electronically at [DOCCP@mt.gov](mailto:DOCCP@mt.gov) or by mail to the Community Development Division in the Montana Department of Commerce <http://comdev.mt.gov>.

### ***Relevant Areas***

The term "entitlement areas" refers to cities and counties that qualify to receive one or more formula grants. These areas must complete a Consolidated Plan separately from the State's to receive funding and include Billings, Great Falls, and Missoula. For purposes of this Citizen Participation Plan, "non-entitlement" refers to cities and towns that do not file Consolidated Plans individually or as part of a consortium and are not eligible to receive formula funding from HUD directly. Individuals wishing to contribute to the Consolidated Planning process in these areas should contact housing and community development specialists in these cities.

### **Encouraging Citizen Involvement**

#### ***Public Notice and Outreach***

An informed citizenry is critical to effective and responsive housing and community development programs. Efforts to educate residents and empower participation are an ongoing element of the Consolidated Planning process.

The CPP is the fundamental means of notifying interested citizens about the Consolidated Plan and related activities, such as the Annual Action Plan or the Consolidated Annual Performance and Evaluation Report. The State utilized display advertisement notices in newspapers of general circulation and through Commerce or MDPHHS websites and list serves. Such notices were published at least 10 days prior to public hearings. All notices were written in plain, simple language and direct efforts were taken to publish and/or post information at locations that would elicit maximum low- and moderate-income and minority participation.

Public education and outreach were facilitated through the use of public advertisements that describe the Consolidated Planning process, opportunities for citizen participation and available funding through the CDBG, ESG, and HOME programs. The State's Consolidated Plan mailing list included social service organizations, local jurisdictions, low-income housing consumers, neighborhood groups, previous participants and commentators, businesses, developers, and other interested parties.

The Consolidated Plan offered many other opportunities for citizen participation. The State used surveys, general feedback or listening meetings for specific programs, and other means to solicit input in the development of the consolidated plan documents. The State particularly encouraged participation of persons with special needs and/or persons who are often underrepresented in public process (low-income, persons of color, non-English speaking persons, persons with disabilities, persons who are homeless). The State also encouraged the participation of statewide and regional institutions and organizations that are involved or affected by the formula grants in the process of developing and implementing the Consolidated Plan. Participation was solicited and encouraged through the following activities:

#### ***Public Hearings and Input Meetings***

Two public input meetings were held before the publication of the final Consolidated Plan. The primary purpose of the first public hearing was to gather citizen input on housing and community development needs and the proposed Consolidated Plan before it was published for comment. The second public hearing was held during the Consolidated Plan 30-day public comment period and was for review and comment on the Consolidated Plan draft. The public hearings were announced at least 10 days prior to being held. Announcements were made through Commerce or MDPHHS websites, listserves, and at least one newspaper of statewide circulation.

The public hearings took place in locations identified in the announcement of the public hearings that are accessible to persons with disabilities. The dates, times and locations for public hearings were convenient to potential and actual beneficiaries. Non-English speaking persons and those with disabilities will be encouraged to attend. Where a significant number of non-English speaking residents were expected to participate, the State would provide translators when notified of this need prior to the public meetings. Contact information was provided in all public announcements.

### ***Regional, Interest Area Hearings, Focus Groups, and Other Meetings***

In addition to the public hearings, Commerce and the MDPHHS solicited input on housing and community development issues and needs of the homeless population at regional or interest area forums or focus groups. Agencies, advocates, statewide and regional institutions and organizations, and community residents were informed of the meetings through state agency websites, personal contact, media releases, and other methods that the State believes were productive. All sites selected for the forums or focus groups were accessible to disable persons. The State worked with advocacy groups to accommodate special needs groups and non-English speaking attendees.

The forums were conducted with the intention of providing Montana residents the opportunity to voice their opinions and provide insight into the issues prevalent in their communities. The forums provided an opportunity for citizens and interested parties to obtain information about state housing and community development programs, the administering agencies, and funding requirements.

### ***Publication of Consolidated Plan Documents***

The State published its draft Consolidated Plan documents for public review in a manner that affords citizens, public agencies and other interested parties a reasonable opportunity to examine its contents and submit comments.

The draft Consolidated Plan documents were available at selected repositories for the full public comment period. A list of the repositories appears at the end of this Citizen Participation Plan. The draft Consolidated Plan documents was also available for viewing on the Montana Department of Commerce website, located at <http://comdev.mt.gov>. Although interested parties were encouraged to use the repositories' copies or view the Consolidated Plan on the Internet, a reasonable number of hard copies of the proposed Consolidated Plan were available from Commerce during the public comment period.

Citizens or groups that attended any of the forums or public hearings were notified by mail or e-mail of the Consolidated Plan's availability for comment.

The draft Consolidated Plan described the amount of assistance the State expects to receive and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income and the plans to minimize displacement of persons and to assist any persons displaced.

The State openly considered any comments of individuals or groups received verbally or in writing, including e-mail, during the Consolidated Planning process or at public hearings. A summary of the written and public hearing comments are included in the final Consolidated Plan, along with the State's response to the comments.

### ***Public Comment on the Consolidated Plan Documents***

Prior to the adoption of the Consolidated Plan, the State made available to interested parties the draft Consolidated Plan and Executive Summary for a comment period of no less than 30 days. Notification of the availability of the proposed Consolidated Plan appeared in at least one newspaper that is circulated throughout the state.

Before the State submitted a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD, the State made available to interested parties the proposed CAPER for a comment period of no less than 15 days. Citizens were notified of the CAPER's availability through newspaper and email notification informing citizens of the day the CAPER was available to view on the Department of Commerce Community Development Division's website and the specific time period available for comments and the contact information to submit comments.

The CAPER was available on Commerce's website for the full public comment period. Hard copies of the CAPER were available upon request from Commerce during the public comment period. The State considered any comments of individuals or groups received verbally or in writing, including e-mails, or at public hearings. A summary of the written and public hearing comments and the State's responses are included in the final CAPER.

### ***Public Access to Records***

The State will provide all interested parties with access to information and records related to the State's Consolidated Plan and the State's use of assistance under all programs covered by the Consolidated Plan during the preceding five years. The public will be provided with reasonable access to housing assistance records, subject to laws regarding privacy and obligations of confidentiality.

### ***Consultation with Organizations and State Agencies***

When preparing the Consolidated Plan, the State actively consulted with public and private agencies that provide housing, health and social services in order to ensure that the interests and needs of all groups are adequately addressed. This consultation occur through regional and interest area forums, interviews conducted with such organizations (especially those that provide services to special needs populations), and incorporation of data and reports produced by such organizations into the Consolidated Plan.

### ***Amendments to the Consolidated Plan***

There are two types of amendments to the Consolidated Plan: administrative amendments and substantial amendments. Pursuant to HUD regulations, a substantial amendment to the Consolidated Plan occurs whenever the jurisdiction determines on or more of the following criteria have been met:

- Substantially (15% or less) change the allocation priorities or its method of distributing HUD formula grant funds;
- Utilize formula grant funds (including program income) to carry out an activity not previously described in the action plan; or
- Change the purpose, scope, location or beneficiaries of an activity.

Such changes, prior to their implementation, are reviewed under various federal or local requirements, particularly rules on procurement and/or policies on the allocation of public resources. Substantial amendments to the

Consolidated Plan are subject to a formal citizen participation process. Notice and the opportunity to comment will be given to citizens through public notices in local newspapers and other appropriate means. A public comment period of not less than 30 days will be provided prior to implementing any substantial amendment to the Consolidated Plan. State staff will prepare a summary of all comments received in writing and, in cases where any citizens' views are not accepted, provide reasons for the decision. This documentation will be attached to the Substantial Amendment, which will be available to the public and submitted to HUD. After the program year has elapsed by 6 months, the Commerce Director, at his/her discretion, may reallocate up to 15% of the annual HUD CDBG or HOME award that has not been expended or awarded to state grantees, in between normal grant application cycles, to expedite necessary projects and meet the expenditure of funds consistent with HUD regulation and the objectives of the programs.

Occasionally, public comments or events warrant an amendment to the Consolidated Plan. Montana uses Substantial Amendment Criteria to determine the need to amend the Consolidated Plan. The State's Substantial Amendment Criteria includes a change in the described method of distributing funds to local governments or nonprofit organization subrecipients to carry out activities. Application process for subrecipients and criteria for selecting subrecipients are elements of the "method of distribution."

"Standard amendments" are those that are not considered substantial in nature and chiefly pertain to minor administrative modifications of the programs. Thus they do not require in-depth citizen participation.

### ***Citizen Participation in the Event of a Substantial Amendment***

In the event of a substantial amendment to the Consolidated Plan, the State will comply with the following citizen participation process:

1. The State will notify citizens of the availability of the draft substantial amendments, a minimum 30-day comment period, and, if in the State's judgment a public hearing is warranted, the time and location of the public hearing through a newspaper of statewide circulation.
2. Depending on which of the formula grant programs is affected, the substantially amended sections of the Consolidated Plan will be made available on the Commerce website, <http://comdev.mt.gov>. Hard copies will also be available from Commerce and MDPHHS for the full duration of the public comment period.

### ***Consideration of Public Comments on the Substantially Amended Plan***

In the event of substantial amendments to the Consolidated Plan, the State will openly consider any comments on the substantially amended Consolidated Plan from individuals or groups. Comments must be received in writing, including e-mail, or at public hearings if hearings are conducted. A summary of the comments received on the substantial amendments will be included in the final substantially amended Consolidated Plan. A summary of all comments not accepted and reasons for their dismissal will be included in the final substantially amended Consolidated Plan.

### ***Changes in Federal Funding Level***

Any changes in federal funding level after the Consolidated Plan's draft comment period has expired and the resulting effect on the distribution of funds will not be considered an administrative amendment or a substantial amendment.

### ***Complaints and Grievances***

Citizens, administering agencies, local governments and other interested parties may submit complaints regarding violations of this Citizen Participation Plan or federal regulations regarding the preparation of the consolidated plan, amendments to the consolidated plan, or performance reports.

Citizens may also present complaints and grievances orally or in writing at the community meetings, and/or public hearings. All public comments, including complaints and grievances, made either orally or in writing within the 30-day public comment period, will be included in the final Consolidated Plan. Such complaints or grievances shall be directed to the Consolidated Plan representative, Jennifer Olson, Community Grants Bureau Chief, Community Development Division (or successor) at 301 S Park Ave, Helena MT 59602; 406-841-2770; or DOCConPlan@mt.gov.

### ***Timely Response to Complaints or Grievances***

Within 15 calendar days of receiving the complaint, the individual receiving the complaint shall forward the complaint to the individual listed above to respond to the complainant in writing. A copy of the State's response from the Consolidated Plan representative will be transmitted, concurrently, to the complainant and to the Commerce Director or MDPHHS Director, as programmatically applicable. If, due to unusual circumstances, the Consolidated Plan representative finds that it is unable to meet the prescribed time limit, the limit may be extended by written notice to the complainant. The Consolidated Plan representative's notice must include the reason for the extension and the date on which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

Public review materials and performance reports will include data, as appropriate under confidentiality policy and regulations, on any written complaints received and how each was resolved.

### ***Citizen Participation Requirements for Local Governments Receiving CDBG (Small Cities Development Program) Funds from the State***

Units of general local government must provide for and encourage citizen participation as prescribed at 24 CFR 570.486. All Small Cities Program applicants for CDBG funds are required to provide citizen notification and involvement in planning and implementation of the proposed projects through one or more public hearings and other informational efforts. Public hearings must be held at times and in places that are convenient to all stakeholders. The needs of persons with disabilities and non-English speaking persons should be considered for the dissemination of information and the location of public hearings and meetings must be accessible to persons with disabilities. In addition, applicants are required to conduct a community development survey to allow for citizen input on the housing and community needs of the jurisdiction.

### ***Availability of the Citizen Participation Plan***

Copies of the CPP may be obtained by contacting Commerce's website, <http://comdev.mt.gov>. Upon request, the State will make the Plan available in an alternative format accessible to persons with disabilities.

### ***Repositories***

Copies of the draft Consolidated Plan documents can be reviewed at the following list of repositories across the state. Repositories will have hard copies of the documents available for review during the public comment periods only. Repositories will not be receiving public comment on the draft documents, as those must be submitted to Commerce as described earlier.

<b><i>Entity</i></b>	<b><i>Address</i></b>	<b><i>City, State</i></b>
Montana Department of Commerce	301 South Park Ave	Helena, MT
Montana Department of Public Health and Human Services	1400 Carter Drive	Helena, MT

Montana Human Rights Bureau	1625 11 <sup>th</sup> Ave	Helena, MT
Montana State Library	1515 E 6 <sup>th</sup> Ave	Helena, MT
Rocky Mountain Development Council	200 South Cruse	Helena, MT
Mountain Plains Equity Group	2825 3 <sup>rd</sup> Ave North	Billings, MT
District IX HRDC	32 South Tracy Ave	Bozeman, MT
Montana Fair Housing	519 E Front St	Butte, MT
Action for Eastern Montana	2030 North Merrill	Glendive, MT
NeighborWorks Montana	509 1 <sup>st</sup> Ave South	Great Falls, MT
Opportunities, Inc.	905 First Ave North	Great Falls, MT
District IV HRDC	2229 Fifth Ave	Havre, MT
Community Action Partnership of NW Montana	214 Main St	Kalispell, MT
District VI HRDC	300 First Ave North	Lewistown, MT
District XI HRC	1801 South Higgins	Missoula, MT
Homeward	1535 Liberty Ln Ste 116A	Missoula, MT
Montana Community Development Corporation	229 E Main St	Missoula, MT
Great Northern Development Corporation	233 Cascade St	Wolf Point, MT