

State of Vermont Citizen Participation Plan for the use of CDBG, CDBG-DR, CDBG-CV, HOME, ESG, HTF, HOPWA and RHP funds

Updated March, 2025

For the inclusion of the Community Development Block Grant – Disaster Recovery program (CDBG-DR)

The Agency of Commerce and Community Development (ACCD), Department of Housing and Community Development (DHCD) on behalf of the State of Vermont (state), hereby adopts the following amendments to its Citizen Participation Plan to include the Community Development Block Grant Disaster Recovery (CDBG-DR) Program in the ACCD Citizen Participation Plan.

The Citizen Participation Plan is amended to include the CDBG-DR program for the Presidentially Declared Disaster DR-4720 for July 2023 flooding. The CDBG-DR program will solicit public comment for a minimum period of 30 days from the date of publication of the draft CDBG-DR Action Plan on its website. The CDBG-DR program will conduct a public hearing either virtually, or in person in the HUD MID area during that 30-day period. The Program shall provide the State of Vermont mandatory notice of 15 days prior to the public hearing on the draft Action Plan and any subsequent Substantial Amendments to the Action Plan. The entire plan will be made available for review and examination on the website at <https://accd.vermont.gov/community-development/funding-incentives/disaster-recovery>.

This Citizen Participation Plan satisfies requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). ACCD will pass down the requirements of 24 CFR 570.486 for citizen participation to subrecipients of CDBG-DR funding.

Previously amended as of April 2021 to add the Recovery Housing Program (RHP) program. Further, previously amended as of April 20, 2020, to include the availability of Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19, dated March 31, 2020, as amended to add paragraph number 7 under Public Hearing to add Waiver #9 of the Available Waivers. In addition, to add paragraph number 6 under Development of the Consolidated Plan, and add paragraph number 5 under Amendments to the Consolidated Plan to add Waiver #8 of the Available Waivers. Further, to add paragraph number 10 under Citizen Participation Requirements for Units of General Local Governments to add Waiver #9.

This plan is developed to encourage citizen participation in the development of the CDBG consolidated plan, any substantial amendments to the consolidated plan and the performance report. It is designed to especially encourage participation by low and moderate income persons, particularly those living in slum and blighted areas and in areas where Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), McKinney Vento Homeless Program for the Emergency Solutions Grant (ESG), the Housing Trust Fund (HTF), and Housing Opportunities for people with AIDS (HOPWA), Recovery Housing Program (RHP), **and Community Development Block Grant – Disaster Recovery (CDBG-DR)** funds are proposed to be used, and by residents of predominantly low and moderate income neighborhoods, as defined by the jurisdiction relevant to the program.

Further this amended plan is developed to encourage citizen participation in the development of the CDBG-DR Action Plan, and any substantial amendments to the Action Plan. It is designed especially to encourage participation by low- and moderate-income people, particularly those living in the identified

HUD MID areas in the Federal Register, and State MID areas identified in the draft CDBD-DR Action Plan.

ACCD provided citizens with a reasonable opportunity to comment on the original citizen participation plan and on substantial amendments to the citizen participation plan and will make the plan available for public review. Upon request, the plan will be made available in an accessible format to persons with disabilities or with limited English proficiency.

ACCD will encourage participation by residents of the public, and assisted housing and infrastructure developments in the process of developing and implementing the consolidated plan and CDBG-DR Action Plan, along with other low-income residents of targeted revitalization areas in which the developments are located.

Public Hearings

1. The ACCD will hold at least two public hearings during the year to obtain citizens' views about housing and community development needs, development of proposed activities and review of program performance. At least one public hearing will be held to obtain the views of citizens on housing and community development needs (including priority, non-housing community development needs) before the Consolidated Plan is published for comment, and a second will be held for the Consolidated Evaluation Performance Report at the end of the Program Year.
2. **ACCD will hold at least one public hearing during development of the CDBG-DR Action Plan to obtain citizens' views about disaster recovery needs, and development of proposed activities. At least one public hearing will be held to obtain citizen views of the draft CDBG-DR Action Plan, including input on identified State MID areas, eligible activities under the CDBG-DR Action Plan, and spending allocations.**
3. The ACCD will ensure adequate public notice before each public hearing, with sufficient information published about the subject of the hearing to permit informed comment. Public hearings will be announced in the newspaper, posted to the ACCD website, and e-mailed to our "All Interested Parties" List. By State law Citizens will be notified of the public hearings at least fifteen (15) days prior to a public hearing being held.
4. Advanced public notice will also be given of all public meetings relating to the Consolidated Plan and performance progress, such as those of the Consolidated Plan Advisory Board.
5. The ACCD will hold all public hearings at times and locations convenient to potential and actual beneficiaries, and accommodations will be made for people with disabilities. All hearings will be held in accessible locations, and sign language interpreters will be made available upon advance request. As far as practicable, hearings will be made available virtually via an online platform such as Microsoft Teams.
6. The ACCD will provide interpretation services for non-English speaking residents at public hearings upon advance request, provided such services are available in the community.
7. In the event of a Disaster, Health Crisis considered a State of Emergency or Pandemic, ACCD will conduct virtual public hearings where the possibility no public attendance is permitted. The public notice will provide the details how to access the virtual hearing, along with providing accommodations for the hearing impaired and non-English speaking Citizens.

8. In the event of a Disaster, Health Crisis considered a State of Emergency or Pandemic, the Notice period for the Virtual Public Hearing(s) need only be for a period of not less than 5 days. **CDBG-DR hearings will always be noticed with the State minimum of 15 days.**

Development of the Consolidated Plan and Other Action Plans

1. The State, through ACCD, will make a concerted effort to notify citizens, agencies and organizations of the development of the consolidated plan and the availability of CDBG, HOME, ESG, HTF, HOPWA, RHP, **and CDBG-DR** funds through mailings, postings and public notices in the newspaper.
2. ACCD will conduct outreach meetings at various and convenient times to inform and educate citizens on the development of the Consolidated Plan, **CDBG-DR Action Plan**, and the availability of funds. ACCD will provide technical assistance to all applicants, with special efforts to assist in the development of applications for funding - particularly predominantly low and moderate-income neighborhoods. Citizens will be encouraged to discuss the various activities funded by CDBG, HOME, ESG, HTF, HOPWA, RHP, **and CDBG-DR** grants, and other Federal HUD programs.
3. Before the ACCD adopts the Consolidated Plan, the ACCD will make available to citizens, public agencies and other interested parties information that includes the amount of assistance that 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.
4. The State will publish its proposed Consolidated Plan for review and comment. The ACCD will publish a newspaper summary describing the contents and purpose of the Consolidated Plan and listing the locations where the entire plan may be examined. The entire plan will be made available for review and examination on the website at <http://accd.vermont.gov>.
5. The ACCD will receive and consider comments on the proposed Consolidated Plan, RHP Action Plan, **or CDBG-DR Action Plan** for 30 days before preparing the final Consolidated Plan, RHP Action Plan, **or CDBG-DR Action Plan** to be submitted to HUD. **DHCD will hold a public hearing on the CDBG-DR Action Plan within the 30-day comment period.**
6. In the event of a Disaster, Health Crisis considered a State of Emergency or Pandemic, the ACCD receive and consider comments on the final Consolidated Plan to be submitted to HUD for a period of not less than 5 days.

Amendments to the Consolidated Plan or Other Action Plans

1. The ACCD will amend its approved Consolidated Plan or Other Action Plans whenever it makes one of the following decisions:
 - a. To make a substantial amendment in allocation priorities or a substantial amendment in the method of distribution of funds;
 - b. To carry out an activity, using funds from any program covered by the Consolidated Plan or Other Action Plans (including program income) not previously described in the action plan; or
 - c. To substantially amend the purpose, scope, location or beneficiaries of an activity.

2. "Substantial amendment" is defined as a change in a planned or actual activity proposed after the official adoption of the Consolidated Plan that affects 10% or more of the State's current annual allocation of CDBG, HOME, ESG, HTF, HOPWA, or RHP funds.
3. **"Substantial amendment" after the adoption of the CDBG-DR Action Plan is defined as a change in a planned or actual activity proposed that affects 20% or more of the State's allocation, or the addition or deletion of an eligible activity.**
4. Substantial amendments to the approved Consolidated Plan or Other Action Plans must be authorized by the Secretary of the Agency of Commerce and Community Development and will be made public by postings and public notices in the newspaper.
5. The ACCD will receive and consider comments on substantial amendments to the Consolidated Plan or Other Action Plans for 15 days before implementing those amendments.
6. **For CDBG-DR, ACCD will receive and consider comments on substantial amendments to the CDBG-DR Action Plan for 30 days.**
7. In the event of a Disaster, Health Crisis considered a State of Emergency or Pandemic, the ACCD will receive and consider comments on substantial amendments to the Consolidated Plan for a period of not less than 5 days.

Performance Reports

1. The ACCD will prepare a performance report each year on the progress of the Consolidated Plan in accordance with the requirements of the U.S. Department of Housing & Urban Development.
2. Citizens will be afforded notice of the performance report through posting and newspapers. The performance report will be available at the ACCD website at <http://acd.vermont.gov> for review, and will be e-mailed to all members of the Consolidated Plan Advisory Board, and to any citizen who may request a copy.
3. The ACCD will receive and consider comments on the performance report 15 days before the report is submitted to HUD.
4. **The ACCD must submit Quarterly performance reports for the CDBG-DR Program through the HUD DRGR System.**
5. **The ACCD will publish a version of each of the HUD-approved Quarterly reports for the life of the Grant on the ACCD website at <http://acd.vermont.gov> within three calendar days of HUD's approval.**
6. **The ACCD will publish a version of any Quarterly reports revised as directed by HUD on the ACCD website at <http://acd.vermont.gov> within three calendar days.**

Citizen Participation Requirements for Units of General Local Governments

The ACCD will ensure that the Units of General Local Government adhere to the citizen participation requirements as stated at §91.115(e), and relevant HUD regulations and guidance, to provide for and encourage to the greatest extent possible participation by low and moderate-income persons located in

areas in which CDBG, HOME, ESG, HTF, HOPWA, RHP, **and CDBG-DR** funds are proposed to be used.

Units of General Local Government shall provide the citizens with the following:

1. The amount of funding expected to be made available, the types of activities that may be undertaken, and the amount of funds to be used to meet the National Objective to benefit low and moderate income individuals as stated in the Consolidated Plan Action Plan, **or program specific action plan, such as the CDBG-DR Action Plan;**
2. The Anti-displacement and Relocation Plans as required under §570.488, and these Plans are required to be filed with the Agency at the time of application of funding requests;
3. Technical assistance to persons of low and moderate income that request assistance in developing proposals in accordance with the application procedures developed by the State;
4. Conduct public hearings in a manner to meet the needs of non-English speaking residents where a significant number of non-English speaking residents are anticipated to participate;
5. Conduct two public hearings: the first hearing shall be held at least 5 days prior to submission of an application to the State for funding, and the second hearing shall be held prior to the Completion Date of a grant agreement/project;
6. With a 15-day advance notice of holding public hearings, and the notice shall provide sufficient information on the proposed project to allow for informed comment and attendance at the hearing;
7. Conduct another hearing in the event there is any substantial change to the proposed purpose, scope of work, location, or designated beneficiaries; and
8. With a formal process to submit complaints and grievances, and timely written responses to written complaints and grievances within 15 working days.
9. In the event of a Disaster, Health Crisis considered a State of Emergency or Pandemic, the Notice period for the Virtual Public Hearing(s) need only be for a period of 24 hours-notice, be published on the municipal website and two other public locations in the municipality. This follows the Secretary of State guidelines.

Access to Information and Records

1. The State, through ACCD, will provide citizens, public agencies and other interested parties with reasonable and timely access to information and records relating to the State's Consolidated Plan and the State's use of funds under the CDBG, HOME, ESG, HTF and HOPWA programs during the preceding five years.
2. The State, through ACCD, will regularly communicate with citizens and applicants for CDBG, HOME, ESG, HTF and HOPWA funds regarding the progress of the Consolidated Plan. Representatives of the Consolidated Plan Advisory Board will be encouraged to communicate with their local constituents on the progress of the Advisory Board.

3. **The State, through ACCD, will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the State's CDBG-DR Action Plan and the State's use of CDBG-DR funds during the active program period.**

Comments and Complaints

1. The ACCD will consider any comments or views of citizens received in writing, or orally at public hearings, in preparing this Citizen Participation Plan, the final Consolidated Plan, RHP Action Plan or substantial amendments to either the Consolidated Plan or the RHP Action Plan, and the annual performance reports. A summary of these comments or views will be attached to the Citizen Participation Plan, the final Consolidated Plan, or RHP Action Plan, substantial amendment or performance report.
2. The State, through ACCD, will respond to written complaints received by ACCD relating to the Consolidated Plan, any amendments to the Plan, and the annual performance reports. Upon request, ACCD will transcribe oral complaints for signature by the complaining person or organization. Where practicable, ACCD will respond to complaints within 15 working days of receiving the written complaint.
3. **For CDBG-DR, ACCD will consider any complaints, comments or views of citizens received in writing, or orally at public hearings. The State, through ACCD, will respond to oral and written complaints related to the Action Plan and any amendments. Upon request, ACCD will transcribe oral complaints for signature by the complaining person or organization. Where practicable, ACCD will respond to complaints within 15 working days of receiving the written complaint.**