

Module 5

State Consolidated Plans



STATE CONSOLIDATED PLAN

Goal: To provide participants with an understanding of how to review the CDBG portion of the State Consolidated Plan.

Objectives: Participants will be able to understand:

1. Where to find materials to help review the State Consolidated Plan.
2. Headquarters thinking behind changes that were made to the State Consolidated Plan in 2006.
3. How to handle difficulties that arise during the review of the Consolidated Plan.
4. Techniques to improve the Citizen Participation performance of their assigned States.

Time: 1 hour and 15 minutes

Training and Presentation Style: Steve Rhodside will moderate a panel of 3 field office representatives that will cover how to review Consolidated Plans, how to improve Consolidated Plan submissions and how to improve the Citizen Participation of States. Steve will also highlight some headquarters concerns regarding the Consolidated Plan.

State Consolidated Plan

I. Review Time Frames

- A. HUD has 45 days from receipt of the plan to review and approve/disapprove the plan. After this time it will be considered automatically approved.
- B. Partial approval – HUD can approve some portions of the plan and not approve others (e.g. approving CDBG, ESG and HOPWA and disapproving HOME). HUD must meet the timetable in paragraph D below for the portion of the conplan that is disapproved.
- C. Grounds for Disapproval (24 CFR 91.500(b))
 - 1. Inconsistent with purposes of NAHA
 - 2. Substantially incomplete (no citizen participation, does not meet regulatory requirements, certifications rejected, no description of how assistance will be provided to troubled PHA's.
 - 3. Certifications not acceptable to the Secretary.
- D. If Consolidated Plan is not approved, HUD must notify grantee before 45 days review period expires and within 15 days after notification, HUD must provide in writing the reasons for disapproval.
 - 1. Grantee has 45 days from 1st notification (not the written notice) to revise or resubmit Consolidated Plan.
 - 2. HUD must respond with approval/disapproval within 30 days of receiving revisions/resubmissions.

II. Citizen Participation Plan

- A. Grantees are required to adopt a citizen participation plan (CP) in accordance with 24 CFR 91.115.
- B. States are required to hold one public hearing on housing and community development needs and the expected amount of assistance to the jurisdiction, the range of activities that will be undertaken, the amount that will benefit persons of very low- and low-income and the plans to minimize the displacement of persons and to assist any persons displaced before the proposed Consolidated Plan

is published. Section 104(a)(3)(D) of the HCDA indicates that the State must hold at least 2 public hearings per year at two different stages of the program year.

1. A summary of the public hearing comments and other citizen written comments are required by HUD to be attached to the final Consolidated Plan, amendment to the plan or performance report. (24 CFR 91.115(e)).

C. Section 24 CFR 570.486 describes the citizen participation compliance requirements for UGLGs receiving funds from the state.

III. Con Plan Rule dated February 9, 2006.

A. Action Plans must include outcome measures for activities in accordance with the Federal Register Notice dated March 7, 2006. (general objective category, decent housing, suitable living environment, economic opportunity, and general outcome category, availability/ accessibility, affordability, sustainability) (91.320(e))

B. Changes were made to the MOD requirements at 91.320(k) that were talked about yesterday.

IV. Guidelines for Preparing a State Con Plan Submission

A. It is on the web at the following: http://www.hud.gov/utilities/intercept.cfm?/offices/cpd/about/conplan/toolsandguidance/guidance/state_guidelines.pdf

B. It is **not** required. It takes the State through a logical thought process on how to prepare the conplan. It is 25 pages long.

C. The guidelines **clearly** indicate what is required and what is helpful to include in a conplan.

D. The only required tables are Table 1, Housing, Homeless and Special Needs, and Table 2A, Priority Housing Needs and Activities. The other Tables are optional.

E. Tables 3A, B, and C are Summary of Specific Annual Objectives, Annual Affordable Housing Goals, and Annual Action Plan Planned Project Results. Tables 3A and 3C use the outcomes (availability/ accessibility, affordability, sustainability) and objectives (decent housing, suitable living environment, economic opportunity) in the March 7, 2006 Federal Register Notice.

F. We encourage States to use existing data in preparing the con plan. CHAS data is available at <http://socds.huduser.org/scripts/odbc.exe/chas/index.htm>

V. Introduce the Panel