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| --- | --- | --- | --- |
| **Guide for Completeness Review of State Citizen Participation Plan** | | | |
| **Name of Program Participant:** | | | |
| **Staff Consulted:** | | | |
| **Date Plan Was Adopted or Last Amended:** | | | |
| **Name(s) of Reviewer(s):** |  | **Date:** |  |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding**."

**Instructions:** This Exhibit is designed to review the State’s compliance with the Citizen Participation Plan requirements under the Consolidated Plan regulations at 24 CFR Part 91, Subpart B. The Exhibit is divided into nine sections: General Aspects of the Citizen Participation Plan; Development of the Citizen Participation Plan and Any Amendments; Development of the Consolidated Plan and the AFH; Consolidated Plan Amendments and AFH Revisions; Performance Reports; Citizen Participation Requirements for State Governments; Availability to the Public; Access to Records; and Complaints.

**AFH Note**: The requirements for affirmatively furthering fair housing in 24 CFR Part 5 are not covered by this Exhibit. Before conducting community participation for its first AFH, the State must amend the citizen participation plan but there is no specific date by which this amendment must occur. The new requirements are bracketed in the questions.

**Questions:**

a. General Aspects of the Citizen Participation Plan

1.

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| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the State have a Citizen Participation Plan?  [24 CFR 91.115(a)(1)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| [AFFH Requirement, as applicable: If the Plan was adopted prior to August 17, 2015, has it been amended to comply with the citizen participation requirements related to the Assessment of Fair Housing (AFH) added by the July 16, 2015 final rule?]  **NOTE:** Before conducting community participation for its first AFH, the State must amend the Citizen Participation Plan but there is no specific date by which this amendment must occur.  [24 CFR 91.115(a)(1)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

B. Development of the citizen participation plan and any amendments

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Are specific actions described in the Citizen Participation Plan to encourage participation by minorities, non-English speaking persons, and persons with disabilities?  [24 CFR 91.115(a)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Is the State government prepared to provide the Citizen Participation Plan in a format accessible to persons with disabilities upon request (e.g., providing oral Braille, electronic, or large print copies for the visually impaired)?  [24 CFR 91.115(a)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| c. Does the Citizen Participation Plan describe the state government’s procedures for assessing its language needs and identify any need for translation of notices and other vital documents?  [24 CFR 91.115(a)(4)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
| d. Does the Citizen Participation Plan require that the state government take reasonable steps to provide language assistance to ensure meaningful access to participation by non-English –speaking residents of the community?  [24 CFR 91.115(a)(4)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Does the Citizen Participation Plan encourage the participation of Statewide and regional institutions, Continuums of Care and other organizations (including businesses, developers, non-profit organizations, philanthropic organizations, and community and faith-based organizations) that are involved with or affected by programs and activities covered by the Consolidated Plan in the process of developing and implementing the Consolidated Plan [and AFH, as applicable]?  [24 CFR 91.115(a)(2)(ii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Does the Citizen Participation Plan consider alternative public involvement techniques that encourage a shared vision of change for the community and the review of program performance (such as focus groups and the use of the Internet)?  **NOTE:** The regulation suggests exploring alternative techniques but does not require it. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Does the Citizen Participation Plan provide for and encourage citizens to participate in the development of the Consolidated Plan, any substantial amendment to the Consolidated Plan and the performance report [and the AFH, any revisions to the AFH, as applicable]?  [24 CFR 91.115(a)(2)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
| b. Is the Citizen Participation Plan designed to encourage participation from citizens, especially low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and residents of predominantly low- and moderate-income neighborhoods? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

C. Development of THE consolidated plan [AND THE AFH]

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. [AFFH Requirement, as applicable: Does the Citizen Participation Plan require that at, or as soon as feasible after, the start of the public participation process, the State will make HUD-provided data and any other supplemental information the State intends to incorporate into the AFH available to the public, public agencies, and other interested parties?  **NOTE:** The State may make the HUD-provided data available to the public by cross-referencing to the data on HUD’s Website. ]  [24 CFR 91.115(b)(1)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
| b. Does the Citizen Participation Plan require that, before the State adopts [an AFH or] a Consolidated Plan, the State will make available to citizens, public agencies, and other interested parties, information that includes:  i. the amount of assistance the State expects to receive;  ii. the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income,  iii. the plans to minimize displacement of persons and to assist any persons displaced; and,  iv. when and how the State will make this information available?  [24 CFR 91.115(b)(1)(ii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| a. Does the Citizen Participation Plan require the State to publish the proposed Consolidated Plan [and the proposed AFH, as applicable] in a manner that affords residents, units of general local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments?  [24 CFR 91.115(b)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| b. Does the Citizen Participation Plan set forth:  i. how the State will make public the proposed Consolidated Plan [and the proposed AFH, as applicable]; and  ii. how the State will give reasonable opportunity to examine the contents of each document?  [24 CFR 91.115(b)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| c. Does the Citizen Participation Plan require the State to publish the proposed Consolidated Plan [and the proposed AFH, as applicable]?  **NOTE:** This requirement may be met by publishing a summary of each document in one or more newspapers of general circulation [AFH specific: and by making copies of each document available on the Internet, on the local government’s official government Website, as well as at libraries, government offices, and public places.]  [24 CFR 91.115(b)(2)] | | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | | |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the Citizen Participation Plan says the State will publish a summary of the proposed Consolidated Plan [proposed AFH, as applicable], does the Citizen Participation Plan require the summary to:   * describe the contents and purpose of Consolidated Plan, [or the AFH as applicable]; and * include a list of the locations where copies of the entire proposed Consolidated Plan may be examined?   [24 CFR 91.115(b)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Citizen Participation Plan state that the State will provide a reasonable number of free copies of the proposed Consolidated Plan [or the proposed AFH, as applicable,] to citizens and groups that request it?  [24 CFR 91.115(b)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Does the Citizen Participation Plan provide for at least one public hearing on housing and community development needs and proposed strategies [and actions for affirmatively furthering fair housing consistent with the AFH, as applicable,] before the proposed Consolidated Plan is published for comment?  [24 CFR 91.115(b)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. [AFFH Requirement as applicable: Does the Citizen Participation Plan provide for at least one public hearing on AFH-related data and affirmatively furthering fair housing in the State’s housing and community development programs before the proposed AFH is published for comment]?  [24 CFR 91.115(b)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Citizen Participation Plan state how and when “adequate advance notice” of the hearing will be given to residents, with sufficient information published about the subject of the hearing to permit informed comment?  **NOTE:** Publishing small print notices in the newspaper a few days before the hearing does not constitute adequate notice. HUD does not specify the length of notice required, but would consider two weeks adequate.  [24 CFR 91.115(b)(3)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Citizen Participation Plan:   1. provide that the public hearing be held at a time and location convenient to potential and actual beneficiaries; 2. provide that the hearing will include accommodation for persons with disabilities, and 3. specify how the hearing will meet these requirements?   [24 CFR 91.115(b)(3)(ii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Citizen Participation Plan identify how the needs of non-English speaking residents will be met in the case of a public hearing where a significant number of non-English speaking residents can be reasonably expected to participate?  [24 CFR 91.115(b)(3)(iii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Citizen Participation Plan provide a period of not less than 30 days to receive comments from residents and units of general local government on the Consolidated Plan, [or the AFH as applicable]?  [24 CFR 91.115(b)(4)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Does the Citizen Participation Plan specify that the State consider any comments or views of residents and units of general local government received in writing, or orally at the public hearings, in preparing the final Consolidated Plan [or the final AFH, as applicable]?  [24 CFR 91.115(b)(5)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Does the Citizen Participation Plan specify that the State will attach to the final Consolidated Plan [or final AFH, as applicable,] a summary of any comments or views, and a summary of any comments or views not accepted and the reasons why?  [24 CFR 91.115(b)(5)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

d. consolidated plan Amendments AND [AFH REVISIONS]

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Does the Citizen Participation Plan specify the criteria the State will use for determining what changes in the State's planned or actual activities constitute a substantial amendment to the Consolidated Plan?  [24 CFR 91.115(c)(1)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. For the CDBG program only: Does the Citizen Participation Plan include, among the criteria for a substantial amendment to the Consolidated Plan, changes in the method of distribution of such funds?  [24 CFR 91.115(c)(1)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| c. [AFFH-specific, as applicable: Does the Citizen Participation Plan specify the criteria the local government will use for determining when revisions to the AFH will be required?  **NOTE:** At a minimum, the specified criteria must include the situations described in 24 CFR 5.164.]  [24 CFR 91.115(c)(1)(ii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Citizen Participation Plan:   1. provide residents and units of general local government with reasonable notice and an opportunity to comment on substantial amendments to the Consolidated Plan [and any revisions to the AFH, as applicable], 2. state how reasonable notice and an opportunity to comment will be given, and 3. provide a period, not less than 30 days, to receive comments on the substantial amendment [or revision to the AFH, as applicable,] before the Consolidated Plan substantial amendments are implemented [or the revised AFH, as applicable,] is submitted to HUD?   [24 CFR 91.115(c)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Does the Citizen Participation Plan require the State to consider any comments or views of its residents and units of general local government received in writing, or orally at public hearings, if any, in preparing substantial amendments to the Consolidated Plan [or revision to the AFH, as applicable]?  [24 CFR 91.115(c)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Does the Citizen Participation Plan specify that the State will attach to the substantial amendment of the Consolidated Plan [or revision to the AFH, as applicable,] a summary of any comments or views, and a summary of any comments or views not accepted and the reasons why?  [24 CFR 91.115(c)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

e. Performance reports

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Citizen Participation Plan:   1. provide citizens with reasonable notice and an opportunity to comment on performance reports, 2. state how reasonable notice and an opportunity to comment will be given, and 3. provide a period, not less than 15 days, to receive comments on the performance report before its submission to HUD?   [24 CFR 91.115(d)(1)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Citizen Participation Plan require the State to consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report?  [24 CFR 91.115(d)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

F. Citizen participation requirements for local governments

21.

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| --- | --- | --- | --- | --- | --- | --- | --- |
| For the CDBG program only: Does the Citizen Participation Plan describe the citizen participation requirements for units of general local government receiving CDBG funds from the State in 24 CFR 570.486, and explain how the requirements will be met?  [24 CFR 91.115(e)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

G. Availability to the public

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Citizen Participation Plan:  a. provide that the Consolidated Plan as adopted, substantial amendments, and the performance report [and the HUD-accepted AFH and any revisions to the AFH, as applicable,] will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request; and  b. state how these documents will be available to the public?  [24 CFR 91.115(f)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

H. Access to records

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Citizen Participation Plan require the State to provide its residents, public agencies, and other interested parties with reasonable and timely access to information and records relating to the State's Consolidated Plan [and AFH, as applicable,] and the State's use of assistance under the programs covered in the Consolidated Plan during the preceding five years?  [24 CFR 91.115(g) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

I. Complaints

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Citizen Participation Plan describe the State's appropriate and practicable procedures to handle complaints from its residents related to the Consolidated Plan, amendments, performance reports [the AFH and any revision to the AFH, as applicable,] which, at minimum, require a timely, substantive written response to every citizen complaint within an established period of time?  [24 CFR 91.115(h)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For the CDBG program only: Is the specified time period for providing a substantive written response to a citizen complaint “within 15 working days, where practicable?”  [24 CFR 91.115(h)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |