|  |  |  |  |
| --- | --- | --- | --- |
| **Guide for Review of Local Government Citizen Participation Plan Performance** | | | |
| **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 program participant’s citizen participation performance to ascertain whether the unit of local government is following its Citizen Participation Plan as required at 24 CFR 91.105(k) of the Consolidated Plan regulations. The Exhibit is divided into two sections: Development of the Citizen Participation Plan and Any Amendments; and Development the Consolidated Plan;

**AFH Note:**  This Exhibit has not been modified to reflect HUD’s Affirmatively Furthering Fair Housing Final Rule, 24 CFR 5.150 et seq.  Please note that FHEO is responsible for making findings regarding fair housing and civil rights related requirements.

a. DEVELOPMENT of the citizen participation plan FOR [NEW GRANTEES] AND ANY AMENDMENTS FOR [ALL GRANTEES]

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| New Grantees Only: Did citizens have an opportunity to comment on the original Citizen Participation Plan or on any substantial amendment(s) to it?  [24 CFR 91.105(a)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did the local government take appropriate actions as identified in the Citizen Participation Plan to encourage participation by minorities, non-English speaking persons and persons with disabilities?  [24 CFR 91.105(a)(2); 24 CFR 91.105(k)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
| b. Did the local government provide the Citizen Participation Plan in a format accessible to persons with disabilities, upon request (e.g., providing an oral, Braille, electronic, or large print copy for the visually impaired)?  **NOTE:** If the Plan is available online, its format must be compatible with web readers for the visually impaired, as required by 24 CFR Part 8.  [24 CFR 91.105(a)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| New Grantees Only: Was the opportunity provided to comment on the original Citizen Participation Plan or on a substantial amendment to this Plan not clearly unreasonable? (A “no” conclusion would be the basis of a Finding that the local government did not provide a reasonable opportunity to comment.)  [24 CFR 91.105(a)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was the Citizen Participation Plan made available to the public?  [24 CFR 91.105(a)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

B. DeVELOPMENT THE CONSOLIDATED PLAN

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government take the actions described in the Citizen Participation Plan to provide for and encourage citizens to participate in the development of the Consolidated Plan and any substantial amendments to the Consolidated Plan, and the performance report?  [24 CFR 91.105(a)(2)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government take the actions described in the Citizen Participation Plan to encourage the participation of local and regional institutions, Continuums of Care and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations and community and faith-based organizations) in the process of developing and implementing the Consolidated Plan?  [24 CFR 91.105(a)(2)(ii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did the local government take the actions described in the Citizen Participation Plan to encourage participation by 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 in developing and implementing the Consolidated Plan?  [24 CFR 91.105(a)(2)(iii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Did the local government provide information to the PHA about the Consolidated Plan activities related to its development and surrounding communities so that the PHA could make this information available at the annual public hearing(s) required for the PHA Plan?  [24 CFR 91.105(a)(2)(iii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| New Grantees Only: Before the local government adopted its Consolidated Plan, did the local government make available (in accordance with its Citizen Participation Plan) to citizens, public agencies, and other interested parties information that included:   * the amount of assistance the local government expected to receive (including grant funds and program income); * the range of activities that may be undertaken; * the estimated amount of funding that will benefit persons of low- and moderate-income; * the local government's plans to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance the local government will make available (or require others to make available) to persons displaced, even if the local government expects no displacement to occur; and * when and how the local government will make this information available?   [24 CFR 91.105(b)(1)(ii)- (iii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government publish the proposed Consolidated Plan in accordance with the Citizen Participation Plan and in a manner that afforded residents, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments?  [24 CFR 91.105(b)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. If Citizen Participation Plan states the local government will publish a summary of the proposed Consolidated Plan, does the summary include:   * a description of the contents the Consolidated Plan; and * a list of the locations where copies of the entire proposed Consolidated Plan may be examined?   [24 CFR 91.105(b)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Did the local government publish the proposed Consolidated Plan?  **NOTE:** This requirement may be met by publishing a summary of each document in one or more newspapers of general circulation 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 91.105(b)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government provide a reasonable number of free copies of the Consolidated Plan to citizens and groups that requested it?  [24 CFR 91.105(b)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government hold at least one public hearing (as set forth in its Citizen Participation Plan) during the development the Consolidated Plan, as applicable?  [24 CFR 91.105(b)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government provide the period specified in its Citizen Participation Plan (of not less than 30 calendar days) to receive comments from residents of the community on the Consolidated Plan?  [24 CFR 91.105(b)(4)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the final Consolidated Plan, as applicable?  [24 CFR 91.105(b)(5)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government take the actions described in the Citizen Participation Plan to provide for and encourage citizens to participate in the development of any substantial amendments to the Consolidated Plan?  [24 CFR 91.105(a)(2)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For each Consolidated Plan amendment, did the local government apply the criteria described in the Citizen Participation Plan to determine what changes in the local government's planned or actual activities constitute a substantial amendment to the Consolidated Plan?  [24 CFR 91.105(c)(1)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Were citizens given notice and an opportunity to comment on substantial amendments to the Consolidated Plan in accordance with the Citizen Participation Plan?  [24 CFR 91.105(c)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Did the local government provide the period specified in its Citizen Participation Plan (of not less than 30 calendar days) to receive comments on any substantial amendments to the Consolidated Plan before such amendments were implemented or revisions were submitted to HUD for review?  [24 CFR 91.105(c)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did the local government consider any comments or views of residents of the community received in writing, or orally at the public hearings, in preparing substantial amendments to the Consolidated Plan?  [24 CFR 91.105(c)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Did the local government attach a summary of any comments or views and a summary of any comments or views not accepted and the reasons why to the Consolidated Plan substantial amendment?  [24 CFR 91.105(c)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government take the actions described in the Citizen Participation Plan to provide for and encourage citizens to participate in the development of the Consolidated Annual Performance and Evaluation Report?  [24 CFR 91.105(a)(2)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government take the actions described in the Citizen Participation Plan to give citizens notice and an opportunity to comment on performance reports?  [24 CFR 91.105(d)(1)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government provide a period of not less than 15 days to receive comments on performance reports before the reports were submitted to HUD?  [24 CFR 91.105(d)(1)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the performance report?  [24 CFR 91.105(d)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government hold two or more public hearings per year (as set forth in its Citizen Participation Plan) to obtain citizens' views and to respond to proposals and questions?  [24 CFR 91.105(e)(1)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Were the public hearings conducted at a minimum of two different stages of the program year?  [24 CFR 91.105(e)(1)(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Was at least one of these hearings held before Consolidated Plan was published for comment?  [24 CFR 91.105(e)(1)(ii) – (iii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the public hearings, together, address:   1. housing and community development needs, 2. development of proposed activities, and 3. proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH or analysis of impediments, and 4. review of program performance?   [24 CFR 91.105(e)(1)(ii)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

26.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government take the actions described in the Citizen Participation Plan to provide adequate notice to citizens of each public hearing?  [24 CFR 91.105(e)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government publish sufficient information about the subject of each public hearing to permit informed comment?  **NOTE:** Publishing small print notices in the newspaper a few days before the hearing does not constitute adequate notice. Although HUD does not specify the length of notice required, two weeks is considered adequate.  [24 CFR 91.105(e)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Were public hearings held at times and locations convenient to potential and actual beneficiaries?  [24 CFR 91.105(e)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Were hearings held with accommodation for persons with disabilities?  [24 CFR 91.105(e)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

29.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government meet the needs of non-English speaking residents in the case of public hearings where a significant number of non-English speaking residents were expected to participate?  [24 CFR 91.105(a)(4)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

30.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government provide (as set forth in its Citizen Participation Plan) citizens with reasonable and timely access to local meetings? Is this access consistent with accessibility and reasonable accommodation requirements?  [24 CFR 91.105(f)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

31.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government (as set for the in its Citizen Participation Plan) make the Consolidated Plan as adopted, substantial amendments, and the performance report available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request?  [24 CFR 91.105(g)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

32.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government provide (as set forth in its Citizen Participation Plan) residents of the community, public agencies, and other interested parties with reasonable and timely access to information and records relating to the local government's Consolidated Plan and the local government's use of assistance under the programs covered in the Consolidated Plan during the preceding five years?  [24 CFR 91.105(h)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

33.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government provide (as set forth in its Citizen Participation Plan) technical assistance to groups representative of persons of low- and moderate-income that requested help in commenting on and in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan?  **NOTE:** The assistance need not include the provision of funds to the groups.  [24 CFR 91.105(i)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

34.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the local government follow the procedures described in the Citizen Participation Plan to handle complaints from citizens related to the Consolidated Plan, amendments, and the performance report?  [24 CFR 91.105(j)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

35.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For the CDBG program only: Did the local government respond to written citizen complaints “within 15 working days, where practicable?”  [24 CFR 91.105(j)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

36.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Based on the review documented above, did the local government follow its Citizen Participation Plan?  [24 CFR 91.105(k)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | | |
|  | | |