



CITY OF BRISTOL CDBG PROGRAM CITIZEN PARTICIPATION PLAN FOR CONSOLIDATED PLANS, ANNUAL PLANS, COMPREHENSIVE ANNUAL PERFORMANCE & EVALUATION REPORTS, and ASSESSMENTS OF FAIR HOUSING

The City of Bristol, through the Economic and Community Development Department, will provide access for the greatest possible public participation in developing its Community Development Block Grant program (CDBG) planning, assessment, and funding process and documents.

The City encourages year-round public participation through monthly meetings of the Economic and Community Development Board. News articles concerning CDBG projects are frequently published in the Bristol Press, a publication with a wide circulation in town. The ECD regularly updates its pages on the City website: www.bristolct.gov.

This plan specifically addresses the requirements of federal regulations as described in CFR 24 Part 91 for a Citizen Participation Plan, and as of 2020, includes amendments to that section referring to the Assessment of Fair Housing (AFH) at CFR 24 Section 5.154.

(1) Encouragement of citizen participation.

The public is encouraged to attend and speak at all meetings. When appropriate and feasible, neighborhood meetings have been and can be arranged. The ECD will conduct outreach to those populations who have historically experienced exclusion, including racial and ethnic minorities, limited English proficient (LEP) persons, and persons with disabilities. The ECD will consult with the Bristol Housing Authority and other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, individuals with disabilities, elderly persons, persons with HIV/AIDS and their families, and homeless persons. The ECD will consult with the Naugatuck Valley Council of Governments, its regional government agency, and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws when preparing both the AFH and the Con Plan.

Bristol commences its annual planning with solicitation of proposals by email, announcements at public meetings such as Bristol Cares (a monthly gathering of social service agencies), and two public advertisements. Legal notices are run in local newspapers, posted to the City's website (www.bristolct.gov), and displayed at various

locations throughout the City requesting proposals, listing eligible activities, offering assistance in formulating a proposal, and announcing the dates of Public Hearings. The email list includes past applicants and recipients, local community agencies, social service agencies, homeless shelters, city departments, public housing officials, and any interested persons or parties who during the prior year have expressed interest.

Public meetings are generally held in the Council Chambers of City Hall (an accessible building and meeting area) in the evening. Following long-standing local procedure and State of Connecticut laws, these hearings and meetings are scheduled in advance, posted, recorded, and open to the public with minutes prepared and available to any interested party. The meetings receive advance publicity and are covered by the local media. When available, written materials are provided at these events.

In the event of a health crisis, such as the Covid-19 pandemic experienced in 2020, technology including videoconferencing (Zoom and Webex) may be utilized to enable Public Hearings and Public Meetings to proceed on schedule and continue to be open for public participation.

If there is a need for an interpreter, the City will make every effort to secure one.

(2) Information to be provided.

a. The consultation process for the Assessment of Fair Housing (AFH) will be completed every 10 years, and submitted for HUD approval in the year prior to the planning year for an updated five-year Consolidated Plan (Con Plan). Proposed analysis and relevant documents including HUD-provided data will be made available to the public prior to a Public Hearing. A 30-day public comment period will be open prior to submission of the AFH to HUD.

b. For 5-Year Con Plans and Annual Plans, Public Hearings are conducted to solicit comments on community needs and proposals submitted to meet these needs. The remainder of the planning timeline is estimated but somewhat dependent upon the schedule of the U. S. Congress. HUD informs the City as to its options if the federal budget schedule is delayed. The Public Hearing announcement is advertised twice and posted at various places in the City.

After the first annual Public Hearing there is a public meeting of the CDBG Policy Committee of the ECD. The CDBG Policy Committee is responsible for the allocation of CDBG funds to subrecipients according to priorities established in the Con Plan and within limitations set by HUD for specified types of grants (public service, facilities, etc.). The CDBG Policy Committee gives serious consideration to all comments made at the hearings in developing the annual Proposed Use of Funds document.

When the CDBG Policy Committee has established the Proposed Use of Funds, the City holds a second Public Hearing. This hearing is advertised twice, with a list of the programs and dollar amounts that are recommended for funding, requesting public comment and inviting public participation. Contact numbers and emails of staff are included in the ads to facilitate public comment before and after the actual hearing date. The Proposed Use of Funds is also referred to the Bristol Planning Commission for comment. The official 30-day comment period begins after public notice of the Proposed Use of Funds, continuing up to its approval by the Economic and Community Development Board.

The CDBG Policy Committee considers comments from the Planning Commission and public comments in their Proposed Use of Funds. The final recommendations of the CDBG Policy Committee are then presented to the full Economic and Community Development Board for approval and/or modification. The ECD forwards its recommendations to the City Council for approval before submission of the Annual Plan to HUD. Once HUD approval has been received, the Board of Finance is requested to appropriate the funds.

Every meeting is public, covered by the local news media, and preserved in minutes available to the public. Comments and corrections may be made at any time prior to submission to HUD.

(3) Access to records.

ECD staff will make available information and records relating to its Consolidated Plan and any programs assisted with CDBG funds to any interested citizens.

(4) Technical assistance.

Technical assistance has always been and will be offered at whatever level of needs of the applicant or organization. When funds are not sufficient or a program is not eligible, the ECD office makes every effort to refer an applicant to another source of funds.

(5) Public hearings.

The ECD Policy Committee holds Public Hearings to obtain citizen views. See Items (1) and (2) above. Public comment is also accepted at all ECD Board meetings.

Drafts of the Consolidated Plan, Annual Action Plan, CAPER, and Assessment of Fair Housing are posted on the City website with a notation that these plans are not final without HUD approval. Final reports are also available online once approved by HUD.

(6) Comprehensive Annual Performance and Evaluation Report (CAPER)

The City annually publishes a legal notice and invites comments on the use of funds for the past program year prior to submitting the Comprehensive Annual Performance and

Evaluation Report (CAPER) to HUD. There is a 15-day public comment period prior to submission of the CAPER, which is due to HUD 90 days after the end of the Program Year. Public Notice is placed in a local newspaper and on the City's website announcing the availability of the CAPER for review and comment. Formal approval of the CAPER by the ECD Board or City Council is not required by HUD, but ECD Board members (including the City Council liaison) will be notified of its availability for review and comment.

(7) Comments and complaints.

The Economic and Community Development Department holds Public Hearings to obtain citizen views. See Items (1) and (2) above.

Economic and Community Development staff and members of the CDBG Policy Committee consider all comments or complaints made by a citizen. A summary of any comments, including those not accepted and the reasons therefore, will be included in the Consolidated/Annual Plan. The ECD has always responded to written (and oral) complaints and will continue to do so.

(8) Criteria for amendment to plan.

HUD regulations require an amendment to a Consolidated Plan when the jurisdiction makes one of the following decisions.

- i. to make a change in its allocation priorities or a change in the method of distribution of funds;
- ii. to carry out an activity, using funds from any program covered by the Con Plan (including Program Income), not previously described in the Annual Plan; or
- iii. to change the purpose, scope, location, or beneficiaries of an activity.

Within this range of amendments, there are amendments that are defined as *Substantial Amendments*. For purposes of the Bristol Con Plan process, a Substantial Amendment shall be defined as one where the change in the distribution of funds for a revised or new activity exceeds 20 percent of the annual entitlement under the CDBG program.

For such Substantial Amendments, the ECD shall prepare a report on the nature of the amendment which shall be made available by public notice for 30-day public comment period. The amendment shall be approved by the Economic and Community Development Board and referred to the Bristol City Council for approval. Substantial Amendments shall be submitted to the U.S. Department of Housing and Urban Development (HUD) within 15 days of local approval.

For those amendments not defined as Substantial, the Economic and Community Development Board shall approve such amendments at a regularly scheduled meeting and make the amendments public.