

CITY OF NEW HAVEN
CITIZEN PARTICIPATION PLAN
Adopted: March 1995
Updated: May 2020

INTRODUCTION

In order to receive Entitlement Funds and other funding resources from the U.S. Department of Housing and Urban Development (HUD) each jurisdiction is required to adopt a Citizen Participation Plan that sets forth its policies and procedures for citizen participation. To respond to Citizen Participation requirements set forth in 24CFR Part 91 (Consolidated Planning Regulations) and 24CFR Subsection 5.154 and 5.158 (Affirmatively Furthering Fair Housing Requirements) the City of New Haven has prepared its Citizen Participation Plan to promote and provide for citizen participation and input as part of its Plan development processes.

Entitlement fund programs made available to New Haven on an annual basis include the Community Development Block Grant (CDBG) program, the HOME program, the Emergency Solutions Grant (ESG) program and the Housing Opportunities for Persons with AIDS (HOPWA) program. The Citizen Participation Plan must provide for and encourage citizens and interested stakeholders to participate in the development of its Consolidated Plan, any substantial amendments to the Consolidated Plan, and the Annual Action Plan and allow for review and comment on the Consolidated Annual Performance and Evaluation Report (CAPER). HUD requirements are specifically designed to encourage participation by low- and moderate-income persons and by residents in areas where Community Development funds are proposed to be used.

Each community is expected to take appropriate actions to encourage the participation of all its citizens including minorities and non-English speaking persons, as well as persons with disabilities and other special needs. To reflect the needs of the homeless, near homeless and special needs populations, consolidated plan regulations also require coordination and collaboration between the City as an ESG entitlement community, local Continuum of Care (CoC) or Coordinated Access Network (CAN) participants and other key stakeholders in order to foster a comprehensive, community-wide planning process that ensures the seamless coordination of services and funding.

APPLICABILITY

In 1995, upon notification from HUD that the City's major entitlement funding programs required a consolidated submission, then Mayor John DeStefano, Jr. convened an inter-agency task force to work with all segments of the New Haven community and develop a process by which the City would meet its annual submission deadlines and other programmatic requirements. The task force was comprised of representatives from city departments having an integral role in implementing federally-funded programs including the Office of Housing and Neighborhood Development (now the Livable City Initiative -- LCI), the Office of Business Development, the City Plan Department, the Office of Legislative Services, the Welfare Department (now under the auspices of the Community Services Administration), the Health Department, the Human Resources Administration and the Office of Management and Budget. In addition, representatives of the Housing Authority of New Haven and the Vision for a Greater New Haven were participants in this effort. The process, developed by the task force in 1995, continues to be the core of the City's Citizen Participation Plan. However, the establishment of the Livable City Initiative and its neighborhood-based outreach approach necessitated revisions to the initial plan in 1998 and improved methods for the dissemination of information have been reflected in the updated 2006 and 2008 versions. In 2015, the Citizen Participation Plan was again updated to reflect changes in the homeless and special need outreach and participation component of the housing and community development process and requirements to Affirmatively Further Fair Housing (AFFH). Now, in 2020, the City is faced with new outreach and citizen participation challenges in response to the global pandemic, COVID19, a widespread coronavirus that has resulted in quarantines, social distancing and other measures to stop the spread of this virulent and deadly disease.

HUD regulations require that the City prepare a full Consolidated Plan that updates its housing and community development needs, outlines its goals and priorities and develops a strategic plan at least every five years. The Consolidated Plan document is supplemented on an annual basis with an Annual Action Plan that describes the community development resources available to the City and a proposed use of funds by project and/or activity. The City is also required to plan for and provide a structure for Affirmatively Furthering Fair Housing. The City currently has an Analysis of Impediments to Fair Housing Choice (AI) that addresses this requirement. HUD

requirements for the preparation of an Assessment of Fair Housing (AFH) have been suspended until further notice but will, when required for submission, incorporate citizen participation and public input.

ENCOURAGEMENT OF CITIZEN PARTICIPATION

- **Consultation with Elected Officials:** In order to create an effective method of understanding the needs and priorities of the residents of New Haven, the elected officials (Alders) of each targeted neighborhood will receive background information about the federal regulations governing Consolidated Plan Resources (CDBG, HOME, ESG, HOPWA) and the City's housing and community development goals and objectives. At the start of the Consolidated Plan and/or Annual Action Plan Development process local officials will be provided with an information packet describing the resources available, local goals and priorities, program eligibility and past performance information to assist in community outreach. Elected officials will be encouraged to work with their constituents to develop and represent existing neighborhood and city-wide needs, assist with the establishment of programmatic goals, objectives and strategies and help develop targeted investment criteria. As appropriate throughout the process, elected officials will be asked to facilitate neighborhood meetings as well as help identify community-based agencies, neighborhood institutions and other appropriate groups to participate in city programs.

- **Neighborhood Consultations:** Neighborhood residents are given numerous opportunities to comment on and make suggestions to the City's community development plans and activities. With the creation of the Livable City Initiative (LCI) the City has developed a structured system of neighborhood outreach. Each neighborhood has a designated Neighborhood Specialist from LCI staff. The Neighborhood Specialists serve as the liaison between neighborhood residents and City administration. Neighborhood Specialists work with community residents, police substation personnel and Community Management Teams/Neighborhood Improvement Committees to develop long-range plans and solutions to community needs. As part of the collaborative outreach process Neighborhood Specialists will also be utilized to facilitate the Citizen Participation process at the

neighborhood level.

- **Homeless Consultation:** To meet homeless participation requirements, the City will collaborate with the local Continuum of Care (CoC) network of providers, now operating as a Coordinated Access Network, and the ESG Citizen Review Board in reaching out to and consulting with homeless or formerly homeless individuals when considering and making policies and decisions regarding any facilities or services that receive funding under the Emergency Solutions Grants (ESG) program.

- **Special Needs Consultation:** To ensure the needs of the special needs and disability communities are represented as part of the citizen participation process, the City will collaborate with local Continuum of Care (CoC)/Coordinated Access Network (CAN) providers, the City Office of Disability Services, Community Services Administration representatives, and housing and social service providers throughout the region serving special needs populations.

- **Additional Citizen Input** – The Mayor holds numerous events in City Hall and at schools, senior centers, local restaurants and coffee shops and various other locations giving citizens the opportunity to comment. City staff are also available for meetings in person, virtually or by phone. Agencies that are applying for funding within a particular neighborhood will be requested by the City to present their activities before the appropriate neighborhood Community Management Team. These neighborhood committees forward recommendations and comments to the City in reference to these activities.

- **Consultations with Other Collaborators and Service Providers:** To ensure community development activities represent the needs of the community, the City will schedule informational opportunities for potential funding recipient agencies. At least one (1) informational meeting will be held to inform and educate representatives of potential recipient agencies and seek community input on needs and comments on past performance. Information will be made available which describes expected funding levels, past funding

investments, meeting schedules, and the legislative review process. The application for funding and approval criteria will also be reviewed. Eligible activities and beneficiaries will be detailed. It is not expected that individual citizens will be involved in the development of agency applications. Most individual citizen requests for funding will be originated through agencies or city departments that accept individual requests for assistance, such as LCI. LCI will accept applications for CDBG and HOME funds for homeowner rehabilitation and homebuyer assistance on an on-going basis throughout the program year. In addition, LCI will review applications for assistance for larger projects from not-for-profits through both the advertised process and on a continuing basis while funds are available.

- **Regional Outreach** - In addition to local activities, City representatives participate in regional discussions of housing and community development issues through meetings with the South Central Regional Council of Governments, the Connecticut Council on Municipalities, the Regional Growth Connection, the Connecticut Coalition to End Homelessness, the Greater New Haven Coordinated Access Network (CAN), the Regional Growth Partnership, the Affordable Housing Roundtable and other such entities. Through these venues, discussions of housing, community development, special needs, economic development, employment needs, job training needs and transportation needs of the region are possible.

- **Notices of Availability** - Letters and/or emails announcing the availability of funds and the location(s) of the information meetings will be sent to local agencies that provide public service, housing rehabilitation, community development and economic development assistance and other groups that provide service to citizens who are presumed to be income eligible. A list of over 150 agencies has been identified by City departments as past or potential recipients. A notice of availability of funds, which includes the announcement of the application process, funding availability, and any dates for deadlines and/or informational meetings or technical assistance, is posted on the City website and also

published in the New Haven Register and regional publications of general circulation.

- **Meetings** - Public Meetings and Hearings will be held at times and locations accessible to community residents. In addition to the presentation of background material to initiate discussion, an outline of the Consolidated Plan or Action Plan process will also be available. Neighborhood maps and information on past spending patterns will be available as appropriate. The proposed timeframe for the process including deadlines, meeting dates and the availability of draft documents for comment and review will also be presented. Spanish-speaking translators will be present as appropriate through advance notice. For Accessibility Related accommodations please contact (203) 946-7833 (voice) or (203) 946-8582 (TTY/TTD). through advance notice that such assistance will be needed.
- In times of a declared emergency, virtual meetings will be held with times, dates and access methods widely available to community residents and stakeholders. Virtual meeting times and methods will be publicized on the city website, emailed to the city's Consolidated Planning mailing list of past and potential participants, and communicated to vested community stakeholders (dependent upon the emergency) with contacts provided by the City's Emergency Operations Center (EOC).
- **Availability of Documents** - Copies of draft documents and informational materials will be made available for review on the City website, within designated municipal offices in City Hall, in the Main Branch of the Public Library and at each neighborhood police substation as appropriate for community notification. In times of a declared emergency or social distancing, these documents will only be made available on the City's website or by email request. Meeting notices and other public notices relative to the Consolidated Plan are also posted on the City website, in the local newspaper and at each sub-station by the Neighborhood Specialists.

INFORMATION TO BE PROVIDED

In order to ensure access to information, the public will have access to reports, information and records during normal working hours (9am to 5pm) throughout the year. Copies of draft materials will be placed in the Office of the City/Town Clerk, LCI, Office of the Development Administrator, and the Main Branch of the Public Library until a Plan is adopted. In addition, copies will be placed at all Police Substations and the Office of Management and Budget. Copies of draft documents, final plans and reports and supporting documentation are also posted on the City's website for review and comment. In times of a declared emergency or social distancing, these documents will only made be available on the City's website or by email request.

If the information requested should be about items not covered in the current Consolidated Plan every effort will be made to ensure that the request is referred to the proper agency responsible for the item in question.

TYPES OF INFORMATION TO BE MADE AVAILABLE

- Consolidated Plan overview
- Five Year Consolidated PlanConsolidated Annual Action Plans
- Proposed Amendments to the Consolidated Plan or Annual Action Plans
- Consolidated Annual Performance and Evaluation Reports (CAPER)
- Citizen Participation Plan
- Maps of the City (Census Tracts, Wards, Neighborhoods)
- Schedule for Legislative Review of Consolidated Plan
- Dates of opportunities for public participation and comment
- Previous Spending Patterns
- Resources available for the next fiscal year
- Notifications of new resources made available through HUD
- Eligible activities which benefit low, very low, and extremely low income persons
- Anti-Displacement and Relocation Assistance Plan
- Analysis of Impediments to Fair Housing and Fair Housing Documents and Information
- Regulatory Requirements for the HUD Funding Sources (CDBG, HOME, HOPWA ESG)

NOTIFICATION OF CITIZENS

- A Notice describing the availability of federal funding and date(s) for the informational workshop(s) will appear in the New Haven Register in late September or October.
- It is estimated that the Draft Plans or Annual Action Plans will be available between March 1st and April 30th prior to the new fiscal year. A Notice will appear on the City website and in appropriate publications announcing the availability of the Draft Plan for review and comment. Draft Plans will be available for review online at the City's website, the Main Branch of the Public Library, the City/Town Clerk 's Office, Police Substations, Office of the Economic Development Administrator and other accessible locations.
- A Summary of the Draft Plan or Annual Action Plan will be published and made available both online and in the public depositories listed above.
- A schedule of neighborhood meetings and Aldermanic hearings will be published and made available in City Hall and online.
- Spanish translation of public notices will be provided on the City website.
- Spanish translation of documents will be provided upon request.
- Notification of the Consolidated Plan process will also be provided through publication via other online news resources as appropriate.
- At the end of each program year, the City will publish a notice of the availability of its Consolidated Annual Performance and Evaluation Report (CAPER) for review and comment both online on the City's website and in the New Haven Register.
- The City will publish notices of other plans and assessments for citizen comment and review, as required by HUD, in the same manner it advertises its entitlement program documents.
- The City will advertise meeting dates on the city website, via mail and/or email, and in newspapers of general circulation to invite citizen and stakeholder input at planning and needs assessment meetings required to support housing and community development processes.
- Any plans or assessments, required by HUD for adoption and approval, will be provided to the public for their review and comment prior to adoption.

- In instances when the City receives allocations for supplemental funding through HUD that complements the Consolidated Plan, notification of funding availability, dates for application submission, proposed use of funding, and citizen comment procedures will be publicized on the city's website, emailed to past and potential recipients, and posted in the New Haven Register. Notices will include dates for comment, review and approval.

PUBLICATION OF A DRAFT CONSOLIDATED PLAN OR ANNUAL ACTION PLAN

- The City of New Haven will publish an open letter to the residents of the City inviting participation in the development of a Consolidated Plan or Annual Action Plan and advertising the availability of community development funding.
- The City of New Haven will publish a summary of the Consolidated Plan or Annual Action Plan when available online and in at least one general circulation newspaper. Notice of plan availability will also be posted on the city website. The summary will include:
 - * A description of the plan contents
 - * Amount and type of funding available
 - * The locations where the Consolidated Plan is available for review
 - * An Annual Action Plan and Budget
 - * A schedule of neighborhood meetings and Aldermanic hearings
- The City will make efforts to provide Spanish language equivalents of plan and funding availability notices.
- The City will provide alternate methods of communication upon request for those with special needs.
- Copies of Draft Plans will be posted on the City's website for public review and comment as a means to increase convenience and availability to the public.
- Copies of the draft Five Year Consolidated Plan will be sent to the Regional Council of Governments and neighboring municipalities.

COMMENT PERIOD

Citizens will be encouraged to comment upon the Draft Consolidated Plan and/or Annual Action Plan. They will be asked to submit comments during public hearings and other public meetings, neighborhood meetings and in writing. The comment period will extend for at least thirty (30) days. All comments will be considered and a written response from the appropriate City Department will be issued within fifteen (15) days of receipt as appropriate.

Written comments should be sent to:

Office of Management and Budget
Attn: Consolidated Plan Comments
165 Church Street
New Haven, CT 06510

or email to:

conplanapp@newhavenct.gov, achamplin@newhavenct.gov or rgizzi@newhavenct.gov

- Schedule of public meetings for comments will be published at least one week prior to the beginning of the public comment period.
- Responses in Spanish will be available upon request.
- In instances when the City receives allocations for supplemental funding through HUD that complements the Consolidated Plan, notification of funding availability, dates for application submission, proposed use of funding, and citizen comment procedures will be publicized on the city's website, emailed to past and potential recipients, and posted in the New Haven Register. Notices will include dates for comment, review and approval.
- In times of declared disasters, the City may opt to utilize waivers made available to expedite the citizen participation and application process including the reduction of public comment periods, usage of virtual meetings and changes in application processes.
 - In 2020, in response to the COVID19 pandemic, HUD has in effect several waivers that pertain to citizen participation and the application process. The City will utilize these waivers to effectively and efficiently make funds available to address emergency community needs. These include the utilization of a 5 day comment period, virtual meetings and electronic postings of documents and signatures.
 - The City will employ such measures now, as they address COVID19 concerns, and in the future under any "Emergency Declarations".

PERFORMANCE REPORTS

The annual performance report, as required by HUD shall be made available in the same locations as the Consolidated Plan documents to afford all citizens sufficient opportunity to comment before submission to HUD. Notification of the availability of such report shall be published in a newspaper of general circulation. An Executive Summary and notification of availability will also be posted on the City's website. Citizens will be afforded a period of fifteen (15) days in which to examine and submit comments on the performance report.

The City shall consider any comments or views of citizens received in writing or orally in preparing the performance report and will attach a summary of comments or views to the final performance report.

Upon submission of the final annual performance and evaluation report to HUD, the Office of Management and Budget shall make it available to the public.

ACCESS TO RECORDS

Access to federal regulations, previous applications and correspondence, agreements, amendments to previous grants and applications, minutes or summaries of all public hearings or meetings, Performance Reports, and other federal and local procedures and policies regarding contracting, rehabilitation, environmental reviews, fair housing, equal opportunity, relocation or other related and relevant documentation will be available through the Management and Budget Office of the City during normal working hours. Translation services will be available upon request.

TECHNICAL ASSISTANCE

In order to ensure that the public has an understanding of the schedule and application process, at least one technical assistance workshop/informational meeting will be scheduled prior to the application submission period. Staff of the appropriate city departments will be available at the workshop(s) and for individual consultation up to the application deadline. Staff will be available to review with the applicant the scope of the work to ensure their submission meets eligibility

requirements. Assistance to Spanish speakers and persons with disabilities will be available upon request.

In times of Declared Disaster/Emergency, the City will employ the provision of technical assistance through virtual meetings, email and online posting to keep citizens and community stakeholders knowledgeable of resources and opportunities.

PUBLIC HEARINGS

There will be a minimum of two periods during the program year when public hearings/meetings will allow citizens to comment on housing and community development needs. Priorities for non-housing needs will also be sought. The first will occur at the beginning of the application period. These opportunities will allow citizens to comment upon past and current spending patterns and to testify about community need. This process will guide staff during the preparation of Draft Plans. During the period from mid-February through the month of May, public meeting(s), accessible to potential and actual beneficiaries, will be held to review the Draft Consolidated Plan or Action Plan and to solicit public comment. Spanish translation will be available. In addition, the legislative review process contains additional opportunity for citizen comment. The schedule of meetings will be published in the Notice advertising the availability of the Draft Plan for review and comment. Such notices will be published to give citizens adequate advance notice of the scheduled meeting dates.

In times of Declared Disaster/Emergency, the City will employ the use of virtual meetings, phone conferences, email and online postings to keep citizens and community stakeholders knowledgeable of resources and opportunities available to them.

COMMENTS AND COMPLAINTS

Citizen comments and complaints will be taken at public hearings, neighborhood meetings, and in writing. Additionally, citizens are encouraged to comment during any public hearing or neighborhood meeting. All comments and complaints will be acknowledged and answered in writing by the appropriate City department within 15 working days of receipt. All written comments and complaints should be sent to:

Office of Management and Budget
Attn: Consolidated Plan Comments
165 Church Street
New Haven, CT 06510

or emailed to:

conplanapp@newhavenct.gov, achamplin@newhavenct.gov or rgizzi@newhavenct.gov

A summary of all such comments will accompany final Plan submissions to HUD.

PLAN AMENDMENTS

Any substantial change in the activities adopted in the Strategies and Goals or the One Year Action Plan will require an amendment to be submitted to HUD. A substantial change will mean any new allocation or use of funds, major reprogramming of funds (a reprogramming of more than 15% of the grant allocation for a given program year or \$100,000 whichever is greater), or a change in the method of distributing funds not previously contemplated in the original submission. Such changes must be approved by the City's legislative body. In order to advise residents of such changes the City will publish notice of the public hearing wherein changes will be discussed. A copy of the Plan amendment narrative will be posted on the City's website and made available in printed format at City Hall. Citizens will be given thirty (30) days to comment on the proposed amendment in accordance with federal regulations. Every effort will be made to inform those affected by major changes by posting notices in affected neighborhoods and City offices, libraries, the City/Town Clerk's office and other appropriate locations. At least one (1) public hearing will be held during the public comment period at which citizen comment will be solicited. All comments will be considered before final adoption of an amendment. The final amendment will then be available to the public.

- In times of Declared Disaster/Emergency, the City will employ the use of virtual meetings, phone conferences, email and online postings to keep citizens and community stakeholders knowledgeable of resources and opportunities available to them.
- In 2020, in response to the COVID19 pandemic, HUD has in effect several waivers that pertain to citizen participation and the application process. The City will utilize these waivers to effectively and efficiently make funds available to address emergency community needs. These include the utilization of a 5 day comment period, virtual meetings and electronic postings of documents and signatures.
- The City will employ such measures now, as they address COVID19 concerns, and in the future under any similar “Emergency Declarations”.

COMMUNITY PARTICIPATION and the AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH) RULE

Community Participation, consultation, and coordination is also required under the Affirmatively Further Fair Housing (AFFH) rule (24 CFR § 5.158). The requirements for community participation under the AFFH rule are the same as the “Citizen Participation” requirements in HUD’s Community Planning and Development regulations, but are two separate processes.

For the purposes of the AFFH rule, community participation, as required in 24 CFR § 5.158, “means a solicitation of views and recommendations from members of the community and other interested parties, a consideration of the views and recommendations received, and a process for incorporating such views and recommendations into decisions and outcomes.”

The City of New Haven, as a Consolidated Plan program participant, must ensure that plans and assessments prepared in response to the AFFH rule, are informed by meaningful community participation in the process of assembling and analyzing data; identifying fair housing issues and In conducting the community participation process, the City conduct outreach residents, community stakeholders and impacted individuals as well as to populations who have historically experienced exclusion, including racial and ethnic minorities, limited English proficient (LEP) persons, and persons with disabilities.

All program participants are required to ensure that community participation is conducted in accordance with fair housing and civil rights laws, including title VI of the Civil Rights Act of 1964 and the regulations at 24 CFR part 1; section 504 of the Rehabilitation Act of 1973 and the regulations at 24 CFR part 8; and the Americans with Disabilities Act and the regulations at 28 CFR parts 35 and 36, as applicable.

For plans and assessments prepared for AFFH purposes, citizen participation; community outreach; notification; public review; comment opportunities; and plan approval and adoption methods will be conducted in the same manner as those established for the City's Consolidated Planning process.

Residential Anti-Displacement

The City of New Haven has adopted a Residential Anti-Displacement and Relocation Assistance Plan in order to minimize the displacement of persons from their homes to the maximum extent possible. The City will replace all occupied and vacant occupiable low and moderate income dwelling units that are demolished or converted as a direct result of the activities assisted with CDBG or other federal funding.

In the event that an occupied dwelling must be acquired and demolished, the City will comply with the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, as well as any other relocation regulations imposed by HUD.