



**Community Development Block Grant Program
(CDBG)**

CITIZEN PARTICIPATION PLAN

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The Coronavirus Aid, Relief and Economic Security Act (CARES Act) has made available supplemental funding, flexibility and waivers in response to COVID-19. CDBG-CV funds provided by the CARES Act are to prevent, prepare for, or respond to Coronavirus. Additionally the CARES Act provides CDBG grantees with flexibilities to make it easier to use CDBG-CV funds, 2019 and 2020 CDBG funds and authorized HUD to grant waivers and alternative requirements.

To take advantage of the funds and flexibility the Town is required to amend the approved plans affected by these changes including the Citizens Participation Plan, Annual Action Plans for 2019, 2020 and related Consolidated Plans. Below is a list of waivers as they apply to the Citizens Participation plan.

- **Citizen Participation and Public Hearings for Consolidated Plans and Action Plans:** CARES Act provides that grantees may amend citizen participation plans to establish expedited procedures to draft, propose, or amend consolidated plans. Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. The 5-day period may run concurrently for comments on action plan amendment and amended citizen participation plans.
- **In person meetings are not required.** Grantees may meet public hearing requirements with virtual hearing requirements if 1) national/local health authorities recommend social distancing and limit public gatherings for health reasons; and 2) virtual hearings provide reasonable notification and access for citizens in accordance with grantees certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.
- The Town's plans were posted with a 30 day public comment period before the waivers were issued. Draft Consolidated Plan including the 2020 Annual Action Plan and Citizen Participation Plans were posted on March 31, 2020. Press Release providing notice of the 30 day comment period was issued April 1, 2020.
- The public meeting was held on March 11, 2020 before the waiver was issued.
- The Town is utilizing the 5 day comment period for the notices on the amendments to the 2019 and 2020 Action Plans and corresponding Consolidated Plans and this document.
 - Notice of amendments issued **May 5, 2020**. Offices are currently closed to the public to maintain social distancing and help stop the spread of COVID-19 therefore comments may be submitted via email to: kathleen.girouard@town.barnstable.ma.us. Those without access to email may leave a voice message at 508-862-4678 and someone will get back to them. Comments received by 4pm on **May 12, 2020** will be considered and included in submission to HUD.

INTRODUCTION:

The Town of Barnstable is an entitlement recipient of Community Development Block Grant funds (CDBG) under Title 1 of the Housing and Community Development Act of 1974 (as amended). The Town of Barnstable's Citizen Participation Plan (CPP) was prepared in accordance with section 104(a) 3 of the Housing and Community Development Act of 1974 and has been amended as required for the Consolidated Plan in accordance with CFR Part 91, Section 105 and incorporating 24 CFR Part 5 Affirmative Furthering Fair Housing in accordance with HUD memo released 3/14/2016. The purpose of the CPP is to outline the procedures for citizen's participation in the development and implementation of the Town of Barnstable's Five-Year Consolidated Plans, Annual Plans, substantial amendments to five-year or annual plans, the Assessment of Fair Housing (AFH), and Consolidated Annual Performance Reports (CAPER). The Town of Barnstable is a member of the Barnstable County HOME Consortium, which prepares and submits one single AFH to the U.S. Department of Housing and Urban Development (HUD).

The community involvement process has three main objectives:

1. To help determine the housing, community, and economic development needs of our community.
2. To assess how well the Town is meeting these needs.
3. To help determine priorities.

The Town of Barnstable will make reasonable efforts to encourage all citizens, including low and moderate income persons, persons living in slum and blighted areas, minorities, non-English speaking persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons/agencies, and in conjunction with public housing authorities, residents of public and assisted housing developments to participate in the community development process and throughout the planning, implementation and assessment of all CDBG program(s) undertaken by the Town of Barnstable.

DEFINITIONS AND ABBREVIATIONS:

Five Year Consolidated Plan (aka Consolidated Plan or ConPlan): Identifies housing and community development priority needs within the jurisdiction of the Town of Barnstable. It also identifies the funding and activities required to address priority needs over a five-year period.

Annual Action Plan/One-Year Action Plan (AP): Identifies the housing and community development funding and activities that the Town of Barnstable anticipates being available during each of the program years covered by the Five-Year Consolidated Plan. The Annual Plan also serves as the consolidated application for the CDBG federal entitlement program.

Consolidated Annual Performance Evaluation Report (CAPER): Provides the public with the means to gauge the progress of each activity listed in an Annual Action Plan. This document is prepared at the end of each program year covered by a Five-Year Consolidated Plan.

Assessment of Fair Housing (AFH): As of 3/2016, Replaces the Analysis of Impediments to Fair Housing Choice (AI). Assessment is done by the Barnstable County HOME program as the lead entity for the Consortium in which the Town of Barnstable is a participating jurisdiction. Purpose of the AFH is to identify fair housing issues and related contributing factors, and result in prioritizing and setting of goals for the upcoming planning period. The County submits one AFH to HUD to cover the jurisdictions that make up the consortium.

United States Department of Housing and Urban Development – HUD

Town of Barnstable Planning and Development Department - PDD

POLICIES AND PROCEDURES

The Town of Barnstable will provide the opportunity for the public to participate in the following planning evolutions:

1. Developing Consolidated Plans (includes the Five Year Consolidated Plan and One Year Annual Action Plan)
2. Substantially amending consolidated plans
3. Evaluating the Town of Barnstable's performance in implementing consolidated plans, development of the Consolidated Annual Performance Evaluation Report (CAPER).

By providing the opportunity to comment on the above activities, the Town encourages participation by all citizens, including those who live in neighborhoods where CDBG funds are proposed to be used, those who are of a minority population group, those who may not speak English, and those who have disabilities.

DEVELOPING CONSOLIDATED PLANS:

Policies:

The Town of Barnstable is including the following minimum requirements per 24 CFR 91.105 in the development of the Consolidated Plan.

The Citizen participation Plan requires that prior to adopting the Consolidated Plan, the Town of Barnstable will make available to citizens, public agencies, and other interested parties the amount of assistance the jurisdiction expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the amount that will benefit low-moderate income persons.

The following specific information will be made available on an annual basis:

1. The amount of assistance the Town of Barnstable expects to receive,
2. The range of activities that may be undertaken with such funds, and
3. The amount of funds proposed to be used for activities and the estimated benefit to low and moderate income persons.
4. The amount of assistance may be estimated if HUD has not announced the formula allocation at the time of publication. Should the actual allocation exceed the amount estimated the activity budgets for program administration shall be increased to 20% of the actual allocation amount, public service activities may be increased up to 15% of the actual amount received. Other eligible activities may also be increased to match funds available. If the actual falls short of the estimates the program administration and public service budgets will be reduced so as not to exceed 20% and 15% respectively. Other activities will be reduced to match the actual amount received.

The plan will also identify the Town of Barnstable's plans to minimize displacement and what type of assistance will be made available to those persons displaced.

Anti – Displacement: The Town's general practice is not to undertake any proposed activities that involve displacement or relocation. If a project is approved that results in displacement, the Town of Barnstable, in compliance with Uniform Relocation Act under the Federal Regulations, will work with a qualified relocation advisory agency to give relocation assistance to the occupants to be replaced.

Procedures:

- **Public Hearings/Meeting:** The Town of Barnstable will schedule a public hearing to obtain the views of citizens, public agencies, and other interested parties on housing and community needs and the development of consolidated plans.
- Public meeting notices are posted with the Town Clerk’s office and comply with Massachusetts public meeting law requirements.
- **Document Availability:** In addition to public meetings the Town will ensure copies of draft plans are available for public review in the Planning and Development Department, 367 Main Street, 3rd Floor, Hyannis, MA 02601, and on the Town website www.townofbarnstable.us/CDBG.
- **Public Comment Period:** According to 24 CFR 91.105, all citizens, public agencies and other interested parties have 30 days to submit comments on the consolidated plan and annual action plans. Comments should be submitted in writing to Attn: CDBG, Planning and Development Department, 367 Main Street, 3rd Floor, Hyannis, MA 02601.
- **Consultation Meetings:** During the development of the Five-Year Consolidated Plan, the Town of Barnstable consults with local service providers (public and private) to obtain their opinion on the housing and community development needs of “special needs” households in Barnstable. These households include: 1) elderly/frail elderly; 2) persons with HIV/AIDS; 3) substance abusers; 4) persons with developmental disabilities; 5) persons with mental disabilities; 6) persons with physical disabilities; and 7) the homeless. The consultations may include scheduled meetings, phone interviews, invites to public meetings, written communications, and surveys as deemed appropriate.
- **Surveys:** At times, the Town of Barnstable may utilize surveys to collect additional input from residents or agencies providing services in the community that benefit our citizens.

ENCOURAGEMENT OF CITIZEN PARTICIPATION:

Press Releases: The Town will issue press releases to notify the public of Public Meetings, Document Availability, Public Comment Periods, Substantial Amendments and Notices of Fund Availability. Press releases are distributed to local community agencies and press including but not limited to the following:

Cape Cod Chamber of Commerce	Channel 18
Hyannis Area Chamber of Commerce	Barnstable Television & Web
Hyannis Main Street Business Improvement District	E Cape Commerce
Cape Cod Times & Cape Cod Online	Quantum Communications
Barnstable Patriot	WGBH
Cape Cod Broadcasting	Rede A Brasileira de Radio

These organizations help to further distribution by including the CDBG notifications in their own newsletters and websites while local television and radio announcements help to reach populations who may not have access to the internet or email. (The list subject to change and managed by the Town’s Communications Officer)

Town Website: Notices and draft documents are also posted on the Town website at www.townofbarnstable.us/CDBG. Notices may be included on the Town's social media accounts such as FaceBook and Twitter.

Direct Email: The Town maintains an email distribution list of agencies serving low and moderate income persons, residents requesting CDBG information, and other interested parties. The list is used to distribute notification of CDBG activity including but not limited to the following: Meeting Notices, Fund Availability Notices, Document Availability Notices, and Public Comment Periods.

Anyone wishing to receive email notifications can email:

kathleen.girouard@town.barnstable.ma.us with "Add to CDBG List" in the subject field or by calling 508-862-4678. Participants shall provide the email address they wish to receive such notices at and their name(s). If affiliated with an agency please provide the agency name, title, and phone number.

Participants can be removed from the email distribution list by emailing the same address with "Remove from CDBG List" in the subject field or calling the phone number listed above. Again, please provide the email address and name you wish to remove the list. Participants may also submit email address updates if they want to change the email address that receives such notices.

SUBSTANTIAL AMENDMENTS:

Due to changes in local needs during program years, amendments and/or revisions to the Consolidated Plan and/or Action Plan may be necessary. Some changes may be substantial enough that they significantly alter the priorities of the Action Plan and ultimately the Five-year Consolidated Plan.

Policies: As referenced in CFR 24, Part 91.505, the Town will officially amend its approved consolidated plan whenever it decides to pursue any of the following:

- a. To make a change in priorities or change the method of distribution of funds;
- b. To carry out an activity that does not address the goals described in the action plan; or
- c. To change the purpose, scope, location, or beneficiaries of an activity.

Substantial Amendment Criteria: The criteria for substantial change is defined as a fiscal change that is greater than twenty-five (25%) of the total annual CDBG entitlement.

Procedures:

- The Town of Barnstable will provide timely notifications of any substantial amendments to the Five Year Consolidated Plan and Annual Action Plans by posting the announcement at least 30 days prior to adopting any changes. Notices will be issued as a Press Release, emailed to distribution list and posted on the Town website at www.townofbarnstable.us/CDBG.
- Comments shall be submitted in writing to the Planning and Development Department Attn: CDBG, 367 Main Street, 3rd Floor, Hyannis, MA 02601.
- Notification of the substantial amendment and summary of comments received will be submitted to the Department of Housing and Urban Development (HUD) at the end of the program year. Further, the Town will attach a summary of any comments that were not accepted and provide a written justification for not using them.
- The Barnstable County HOME Consortium will provide notifications of any substantial amendments to the Assessment of Fair Housing (AFH). The public will have 30 days to submit written comments on the amendment from the date the public is notified.

EVALUATING THE IMPLEMENTATION OF CONSOLIDATED PLANS:

Policies:

The Town will provide citizens, public agencies, and other interested parties with reasonable notice and an opportunity to comment on performance reports also known as Consolidated Annual Performance Evaluation Report or CAPER.

Procedures:

- **Public Hearing/Meetings:** The Town of Barnstable will hold a public hearing to obtain the views of citizens, public agencies, and other interested parties on the CAPER.
- Public meeting notices are posted with the Town Clerk's office and comply with Massachusetts public meeting law requirements.
- Comments shall be submitted in writing to the Planning and Development Department, Attn: CDBG, 367 Main Street, 3rd Hyannis, MA 02601.
- Comments will be considered and summarized for the final submission to HUD.

DOCUMENTS AND RECORDS AVAILABLE TO THE PUBLIC AND ACCESS TO RECORDS:

All adopted consolidated plans, annual action plans, substantial amendments, and performance reports will be made available to the public. Information and records relating to the Town's consolidated plan and its use of CDBG funds during the preceding five (5) years shall also be made available to the public.

Requests for documents should be made to the PDD during regular office hours. The Town of Barnstable will make every reasonable effort to assure that CDBG program information is available to all citizens, especially those of low and moderate incomes and those residing in blighted neighborhoods and/or CDBG project areas. The Town will also make every reasonable effort to provide translation services for those needing it upon request. The PDD office is accessible.

In no case shall the Town of Barnstable disclose any information concerning the financial status of any program participant(s) which may be required to document program eligibility or benefit. Furthermore, the Town of Barnstable shall not disclose any information which may, in the opinion of the Town Manager, be deemed of a confidential nature.

TECHNICAL ASSISTANCE:

The Town's Planning and Development Department shall provide technical assistance upon request, to all low, very low and poverty income individuals and/or organizations serving low income neighborhoods or persons. The assistance is for the purpose of developing proposals to request funding under its CDBG program and activities. Town staff will also provide technical assistance to grant recipients to ensure compliance with federal rules and regulations. Please contact the Planning and Development Department, 367 Main Street, 3rd Floor, Hyannis, MA 02601, or call 508-862-4678.

COMPLAINTS:

Complaints related to the consolidated plan, amendments, and performance reports should be made to the Planning and Development Department, 367 Main Street, 3rd Floor, Hyannis, MA 02601. The Town will respond to all comments and complaints regarding any phase of the Barnstable Consolidated Plan, or any activities implemented under the plan, in writing within 15 working days of receipt of them, where feasible. Responses will be substantive, where

appropriate. When complaints remain unsatisfied, the staff will bring the complaint to the Town Manager for review and resolution.

ADOPTION OF THE CITIZEN PARTICIPATION PLAN:

Policies: The Citizen Participation Plan will be adopted as amended following the 30 day public comment period, consideration of comments received, and submission to HUD.

Procedures: The Town of Barnstable will follow the citizen participation plan as outlined in this document or as amended.

Notification of document availability and public comment period published on March 30, 2018 in the Barnstable Patriot, Press Release issued April 5, 2018, and emailed directly to CDBG distribution list.

Draft available for public review April 5, 2018, written comments will be accepted through May 7, 2018.

Amended: April 27, 2020

Adopted: **DATE**

Any comments or questions about this plan can be directed to:

Planning and Development Department

367 Main Street, 3rd Floor

Hyannis, MA 02601

Phone: (508) 862-4678

Fax: (508) 862-4782

Email: kathleen.girouard@town.barnstable.ma.us

Office Hours: Monday through Friday 8:30am to 4:30pm