

THE CITY OF ATLANTA, GEORGIA



CITIZENS PARTICIPATION PLAN 2020-2024 CONSOLIDATED PLAN YEARS

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Prepared by:

City of Atlanta-Department of Grants and Community Development
55 Trinity Avenue, Ste. 3500 Atlanta, GA 30303

Website: <https://www.atlantaga.gov/government/departments/grants-and-community-development>

**Citizen Participation Plan for the City of Atlanta
Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG),
Home Investment Partnership Program (HOME), and Housing Opportunities for
Persons with AIDS (HOPWA)**

City of Atlanta Department of Grants and Community Development 404-330-6390
Georgia Relay (Deaf/Hard of Hearing) Dial 711 to connect to City of Atlanta 404-330-6763

Overview

The City of Atlanta (City) is identified as an Entitlement City by the U. S. Department of Housing and Urban Development (HUD) and receives annual funding through four grant programs: Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), HOME Investment Partnership program, and Housing Opportunities for Persons With AIDS (HOPWA) program. Each entitlement program’s funding is determined by statutory formulas. Title I of the National Affordable Housing Act mandates that grantees receiving these funds prepare the following:

- a five-year Consolidated Plan (Con Plan), which identifies housing and non-housing funding priorities of the community and the specific activities to be carried out with CDBG, HOME, HOPWA, and ESG funds. The plan must contain community goals and objectives to be achieved with HUD funds.
- an Annual Action Plan (AAP) that identifies local community needs connecting to the overarching goals and objectives outlined in the five-year Con plan;
- a Consolidated Annual Performance Evaluation Report (CAPER) assessing the jurisdiction’s annual achievements relative to the goals described in the Con Plan.

Per federal regulations, the City develops projects and funding recommendations for use of these grants by way of the Notice of Funding Availability (NOFA). Through the NOFA process, the City assesses applications submitted by subrecipients, project sponsors, and developers.

The Citizen Participation Plan (CPP) sets forth policies and procedures to provide for and encourage participation by the residents of Atlanta in the development of the City’s Con Plan and the associated AAP. The CPP also applies to any substantial amendments to the Con Plan or an AAP, the preparation of the CAPER which evaluates progress toward the Con Plan objectives, and the Fair Housing Study known as an Analysis of Impediments to Fair Housing Choice (AI) or any other successor study or report for the purpose of evaluating the City’s affirmative commitment to fair housing.

The City submits its adopted Con Plan and AI to HUD every five years. The AAP is adopted annually as an amendment to the City’s Comprehensive Development Plan and is submitted to HUD every year. The CAPER for the previous program year is submitted to HUD 90 days after the end of the previous program year. The CPP is updated periodically, as necessary.

I. Encouragement of Citizen Participation

The City encourages and desires the participation of all the residents of the City, particularly low and moderate-income residents of slum and blighted areas, low and moderate-income residents of areas in which federal and HUD funds apply, including, but not limited to, CDBG, ESG, HOPWA, and HOME funds, are proposed to be used. The City designates its eligible low and moderate-income areas as the Community Development Impact Area, based on income data from the U. S. Census documenting block groups where at least 51% of households have income at or below 80% of Atlanta median income. The City shall take appropriate actions to encourage the participation of the following persons and organizations:

- Minorities;
- Persons with Limited English Proficiency (LEP);
- Persons with disabilities; and,
- Local and regional institutions, the Atlanta Continuum of Care (CoC), the HOPWA Advisory Committee, and other organizations including businesses, developers, nonprofit & philanthropic organizations, and community and faith-based organizations.

Efforts will be made to ensure that non-English speaking residents have an opportunity to participate in the Con Plan, AI, AAP, CAPER, and CPP process, through the following actions:

- Inform the Hispanic community of CDBG, ESG, HOME, and HOPWA funding opportunities through a recognized Spanish language newspaper and/or Spanish language radio.
- Provide documents to the public in Spanish, as needed and upon advanced notice, at NPU meetings, neighborhood organization meetings, and other organizations that serve the Hispanic community.
- Using the City's website, [Grants and Community Development | Atlanta, GA \(atlantaga.gov\)](https://atlantaga.gov/grants-and-community-development), non-English speaking persons can obtain additional information about CDBG, ESG, HOME, and HOPWA programs by viewing the translator link.

(See Section XII, Public Accommodations, for a description of access for disabled persons.)

The City, in conjunction with the Atlanta Housing Authority (AHA), encourages the participation of residents of public housing and residents of low and moderate-income areas where assisted housing developments are located, in the process of developing and implementing the Con Plan, AI, AAP, and Substantial Amendments. The City provides information to the AHA about Con Plan activities related to its developments and surrounding communities so that the housing agency can make this information available at any of its annually required public hearings and/or in its plans for grant program funding.

The City will ensure the Con Plan, AI, AAP, and CAPER are accessible to the public via the City's website and that opportunities for engagement in the development of these planning documents are announced through the website.

The City shall provide citizens with a reasonable opportunity to comment on the CPP and on substantial amendments to the CPP and will make the CPP public. The CPP will be provided to persons with disabilities in an accessible format as needed or requested.

II. Participation of Citizens through the Neighborhood Planning Unit Process

The City is divided into twenty-five Neighborhood Planning Units or NPUs, which are citizen advisory councils that make recommendations to the Mayor and City Council on zoning, land use, and other planning issues. The NPU system was established in 1974 to provide an opportunity for citizens to participate actively in the Comprehensive Development Plan. The system enables citizens to express ideas and share comments on City plans and proposals, including the City's use of the HUD entitlement grants. The City will encourage NPU feedback on funding recommendations for CDBG, ESG, HOME, and HOPWA funding.

III. Public Hearing Protocols

A. Public Hearing Schedule, Notice, and Location

Residents must be provided with reasonable and timely access to local meetings, information, and records related to the Con Plan, AAP, CPP, and Caper. The City will hold public hearings at convenient times and locations (usually City Hall) and if needed virtually in efforts to reach residents most affected by the proposed activities. The goal is to ensure the most affected residents can attend, and the City will make accommodation for persons with disabilities.

Notices are published in one or more newspapers of general circulation, via the City's website (www.atlantaga.gov/government/departments/grants-and-community-development), and are posted in the City's government facilities. The Department of Grants and Community Development(DGCD) will share published information with existing program partners, advisory committees, and interested citizens. Notices are communicated to Spanish-speakers through publication in a recognized Spanish language newspaper and/or advertisement on Spanish-language radio.

If a hearing is scheduled as part of a City Council Committee meeting, the public hearing is noted on the City Council Committee meeting agenda next to the item in question, indicating the time and date of the hearing.

B. Assistance for Non-English-Speaking Residents

The City will provide translation assistance/interpreters and printed materials upon request to non-English speaking residents provided written notice is received by the City at least forty-eight hours prior to public hearings. Contact the DGCD at 404-330-6390, or the Office of Enterprise Assets Management at 404-330-6225. Persons that are Deaf/Hard of Hearing can dial 711 to connect to City of Atlanta 404-330-6763.

C. Accommodations for Persons with Disabilities

The City will provide reasonable accommodations for disabled persons upon request provided written notice is received by the City at least 48 hours prior to public hearings. Contact the Office of Enterprise

Assets Management at 404-330-6225. Persons that are deaf/hard of hearing should dial 711 to connect to the City of Atlanta 404-330-6763.

IV. Public Comments on Proposed ConPlan, AAP, CAPER, CPP, and AFH (as applicable)

Public comments will be solicited prior to and at the public hearings. Citizens will be advised when comments are due and where to submit their comments. The City will receive comments from citizens on its proposed Con Plan, AAP, CAPER, and CPP for a period of time outlined in federal regulation. The Con Plan and AAP will receive comments from residents for 30-days prior to submission of the documents to HUD, unless a waiver is granted to reduce the time period due to a designated federal, state, or local emergency. The CAPER and CPP will receive comments from residents for a 15-days prior to submission of the document to HUD. All resident comments received in writing or orally at public hearings will be considered in preparing the final Con Plan, AAP, CAPER, and CPP. A summary of comments, including a summary of those not accepted and why, will be attached to the final Con Plan, AAP, CAPER, and/or CPP and will be submitted to HUD.

QUICK GUIDE TO PUBLIC REVIEW & HEARING NOTICES

Document Review

- Five Year Consolidated Plan – 30-day review
- Annual Action Plan – 30-day review
- CAPER – 15-day review
- CPP – 15-day review
- Substantial Amendments to Con Plan/Annual Action Plan – 10-day review
- Emergency Substantial Amendments to Consolidated Plan/Annual Action Plan--- 5-day review

Public Hearing Notices

- Public Hearing Notices – 15 days

V. Development of the Con Plan, AAP, and CPP

A. Introductory Public Hearing and NOFA for Con Plan/AAP

The City uses a formal application process for HUD entitlement funding. A public hearing, generally held during the Spring at City Hall, provides the following for citizens and other interested parties:

- Explanation of the ConPlan contents, purpose, and the entitlement grants covered;
- The amount of funds expected to be available for the coming year under each grant;
- Set-aside amounts and “caps” under each grant, including the estimated amount of funds which will be used to benefit low- and moderate-income persons;
- The range of activities that may be undertaken under each grant;
- Solicitation of citizen input on grant priorities and on housing and community development needs, including priority non-housing community development needs;
- Explanation of the pending CAPER’s review of prior program performance;
- Technical assistance session for potential applicants seeking grant funding, including presentations on related City requirements such as insurance, historic preservation, and homeless assistance

under the Continuum of Care process;

- Availability of the CDBG, ESG, HOME and HOPWA application forms to submit proposals requesting funding in the upcoming program year, and the submission deadline.

NOFA information will be made available on the City's website.

Information will also be made available to SR/PS receiving existing funding, NPU's, the HOPWA Advisory Committee, CoC, City agencies, AHA, and interested parties.

B. Technical Assistance during Proposal Development

DGCD will make applications available for organizations, primarily through the DGCD software program portal, during the open solicitation/application period. DGCD will provide technical assistance sessions and release Q&A documents to answer applicant questions. Questions outside of TA sessions should be emailed to DGCD_Planning@CityOfAtlanta.onmicrosoft.com.

C. Proposal Review

Once the solicitation period closes, evaluators will review and score the applications. The funding recommendations are determined based upon the amount of funding available, which applications qualify, and the evaluation scores. Upon DGCD evaluators completion a review and analysis are completed. The HOPWA Advisory Committee and CoC must review the recommendations prior to DGCD's recommendations to the Mayor's office. DGCD will collect and analyze the feedback received from both the HOPWA Advisory Committee and the CoC. Any comments will be collected via email, phone, and/or survey for consideration during the evaluation process.

D. Publication of the Proposed Con Plan and AAP

At the completion of the proposal evaluation process, funding recommendations are formulated by the DGCD for the upcoming program year. These recommendations are transmitted by the Mayor to the CDHS Committee of City Council, for scheduling of a public hearing and for subsequent Council action on the proposed AAP. When a new five-year Con Plan is due to HUD, the public hearing and Council action must also include the proposed Con Plan.

The City will publish the proposed Con plan and AAP in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments. The proposed Con Plan and/or AAP will include the City's goals and priorities governing the allocation of entitlement resources, the amount of assistance the City expects to receive, and activities proposed for funding under each entitlement grant.

A summary of the proposed activities under the Con Plan/AAP, as well as notice of the CDHS public hearing, will be published in one or more newspapers of general circulation, via the City's website (www.atlantaga.gov/government/departments/grants-and-community-development). Notices are communicated to Spanish-speakers through publication in a recognized Spanish language newspaper and/or advertisement on Spanish-language radio at least 30 days prior to submission of the plan(s) to HUD, unless a waiver is granted to reduce the time period due to a designated federal, state, or local emergency. The summary will include the anticipated funding for the upcoming year and the goals and priorities recommended in the Five-Year Con Plan (when a new five-year Con Plan is proposed) and the yearly AAP funding recommendations. The notice will include the locations where copies of the documents may be obtained or accessed.

VI. Development of the Fair Housing Study (AI or successor study)

In developing the Fair Housing Study, the City will consult with community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws, including the Georgia Commission on Equal Opportunity, the Atlanta Human Relations Commission, Metro Fair Housing Services, Atlanta Legal Aid, and other nonprofit organizations that may receive funding under HUD's Fair Housing Initiative Program (FHIP) or that may have other specialized knowledge of fair housing within the city.

Introductory Public Hearing:

- A. During the preparation of the Fair Housing Study, a hearing will be held to obtain the views of the public on fair housing-related data and affirmatively furthering fair housing in the City's housing and community development programs. The public hearing will solicit input on fair housing issues in the city and shall be held during development of the Study before the draft is published for comment.
- B. Availability no later than the date of the public hearing on the Fair Housing Study, the HUD-provided data and other supplemental data will be made available to the public. This may include a link to HUD's website where the data can be readily accessed
- C. Publication of the proposed AI when complete, the City will make available the draft Fair Housing Study for a period of no less than 30 days in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments. Notice of the public comment period on the draft Study will be published in one or more newspapers of general circulation, via the City's website (www.atlantaga.gov/government/departments/grants-and-community-development), the Department of Grants and Community Development mailing list that includes existing programs, advisory committees, and interested citizens. Notices are communicated to Spanish-speakers through publication in a recognized Spanish language newspaper and/or advertisement on Spanish-language radio. In addition, if another population is identified as having a high population number, then the department would consider using another media outlet. The public notice shall include a summary of the content and purpose of the draft Fair Housing Plan, the dates of the public display and comment period, the locations where copies of the draft document can be examined, and how comments will be accepted.

A second public hearing will be conducted during or after the 30-day public comment period on the Fair Housing Study during which the City will address identified factors contributing to fair housing issues and proposed fair housing goals and priorities for affirmatively furthering fair housing. Any comments or views of residents of the community received in writing, or orally at the public hearing, will be considered by the City in preparing the final Fair Housing Study and a summary of these comments or views shall be attached to the final AFH.

- D. Revision to the Fair Housing Study, the City may revise its Fair Housing Study under the following circumstances:
 - A material change occurs. A material change is a change in circumstances in the City that affects the information on which the Fair Housing Study is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the Study no longer reflect actual circumstances. Examples include, but are not limited to:
 - Presidentially declared disasters, under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.), affecting Fulton and/or DeKalb Counties that are of such a nature as to significantly impact the steps the City may need to take to affirmatively further fair housing
 - Significant demographic changes
 - New significant contributing factors in the city, and
 - Civil rights findings, determinations, settlements (including voluntary compliance agreements), or court orders
 - Upon HUD's written notification specifying a material change that requires the revision.

VII. CAPER Performance Report

Citizens will be given 15 days to review and provide comments on the draft CAPER when it is available for review. Notice will be published in one or more newspapers of general circulation, via the City's website (www.atlantaga.gov/government/departments/grants-and-community-development), The DGCD will make CAPER copies available to interested residents by posting in government facilities. Notices are communicated to Spanish-speakers through publication in a recognized Spanish language newspaper and/or advertisement on Spanish-language radio. All public comments received orally at public hearings, virtually or submitted in writing regarding the CAPER will be considered, and a summary of these comments and DGCD responses will be attached to the document. The final CAPER for the previous program year is due to HUD 90 days after the end of the program year.

Citizens, public agencies, organizations and other interested parties may obtain a copy of the proposed/final CAPER by contacting the Department of Grants and Community Development at 404-330-6112, via email, or via the website at www.atlantaga.gov/government/departments/grants-and-community-development.

VIII. Substantial Amendments to the Consolidated Plan/Annual Action Plan

When necessary for the City to adopt a "substantial amendment" to the Con Plan or AAP to allow for new CDBG, HOME, ESG, or HOPWA-funded activities; modification of existing activities; or other program administrative actions, the City shall provide residents with reasonable notice of the opportunity to comment on any proposed substantial change in the use of entitlement funds from one activity to another. Residents will be given ten (10) days to comment on the proposed amendment prior to the implementation of the amendment.

The City is required by HUD to identify the criteria to be used in determining if a proposed action will be considered a Substantial Amendment. The following criteria will be used by the City:

- A change to a previously adopted five-year Con Plan or AAP activity in which the funding allocation for any category of activities is either increased or decreased by an amount of 50% or greater of the amount allocated for that category. In addition, the elimination of any approved activity, addition of a new activity or a significant change to an activity's proposed beneficiaries shall be considered a substantial change.
- The amendment will be available for 10 days for public review and comment followed by a public hearing before the Mayor and CDHS. The City shall consider citizen comments, make the modified AAP available to the public, and submit a copy of the amended APP HUD.

To efficiently utilize grant funds, the City will consider the reprogramming of unspent CDBG, HOME, ESG, and HOPWA balances from completed and cancelled CDBG, HOME, ESG, and HOPWA-funded activities to other eligible activities. Activities under the stated thresholds may be cancelled for cause and funds reprogrammed without resulting in a substantial change. Examples of cause are:

- Cancellation requested by the subrecipient or project sponsor.
- Determination of DGCD that insufficient funding prevents accomplishment of the activity.
- Determination by DGCD that the project cannot be carried out in a timely or eligible manner.

In the event that any of the above “administrative” reprogramming actions are over the threshold limits, and come under the “substantial amendment” criteria, the proposed actions are subject to the Citizen Participation process and will require formal action by the City Council, and notification to HUD.

If an amendment is considered substantial based on the guidelines above, the City’s Con Plan/AAP must be revised, and public notification must be provided before the activity may be carried out. Specifically, for 10 days prior to City Council action on a proposed substantial amendment, the City shall make the substantial amendment public and submit it to affected NPU, public agencies, low/moderate income persons, non-English speaking persons, minorities and persons with disabilities, and other interested citizens. A public comment period must occur, and will follow the same process previously mentioned for posting of the draft Con Plan/AAP amendment, public hearing notification, etc. All comments or views of citizens received in writing or orally will be considered in preparing the final Substantial Amendment to the Plan. A summary of comments including a summary of those not accepted, with rationale, will be attached to the final Con Plan and/or AAP submitted to HUD.

IX. Emergency Plan Amendments

In the event of a local, state, or federally declared emergency or disaster, it may be necessary for the City to reprogram funds to meet urgent community needs. Where program funds covered by the City’s ConPlan and/or AAP may be expended to carry out eligible activities to address the City’s emergency response, the citizen participation requirements under this plan will be streamlined as follows to expedite the availability of funds for disaster-related activities:

1. A minimum of one public hearing shall be held to receive comments on the Emergency Plan amendment
2. The City will publish in one or more newspapers of general circulation, via the City’s website (www.atlantaga.gov/government/departments/grants-and-community-development), the Department of Grants and Community Development mailing list that includes existing programs, advisory committees, and interested citizens, and in government facilities that describes the activities funds are proposed to be reprogrammed from and the activities they are proposed to be reprogrammed to. The notice must also include the date, time, place and purpose(s) of a public hearing on the Emergency Plan Amendment and shall be published at least five (5) days in advance of the hearing.
3. A public comment period of at least 5 days shall commence on or after the date of publication of the public notice. During the public comment period, the City shall receive comments by mail, email, and orally at the public hearing.
4. Following the public hearing, the Emergency Plan Amendment will be presented to the City Council for consideration and formal action.

5. The Emergency Plan Amendment will be submitted to HUD upon approval by the Atlanta City Council.

X. Access to Records and Availability of Documents to the Public

Citizens, public agencies, and other interested parties will be provided with reasonable and timely access to information and records related to the Con Plan, AI, AAP, CPP, and CAPER, and the use of assistance under programs covered by these documents. The City will comply with all provisions of the Georgia Open Records Act to provide public access to information and records related to the Consolidated Plan and the City's use of assistance under HUD entitlement. To facilitate this process, citizens should put their request in writing to DGCD, which will coordinate the review of requested information. Records will be available for five years.

The ConPlan, AI, AAP, CCP, CAPER, and substantial amendments, will be available to the public during normal working hours at the Department of Grants and Community Development 55 Trinity Avenue SW, Ste. 3500, Atlanta, Georgia 30303. Upon request, documents in accessible formats will be made available to persons with disabilities by contacting DGCD at 404-330-6390, by email, or website at www.atlantaga.gov/government/departments/grants-and-community-development.

XI. Complaints

The City of Atlanta will accept written and verbal complaints from citizens related to its HUD-funded projects and to the ConPlan, AI, AAP, Substantial Amendments, the CAPER, and the CPP. The City will provide a timely written response to complaints, generally within 15 working days. Complaints should be directed to:

Commissioner, Department of Grants and Community Development
55 Trinity Avenue, Ste. 3500, Atlanta, Georgia 30303
Phone: 404-330-6390
Email: DGCD_Planning@CityOfAtlanta.onmicrosoft.com
www.atlantaga.gov/government/departments/grants-and-community-development.

The City has designated the Mayor's Office of Constituent Services (OCS) as its entry point for fair housing complaints. OCS refers callers to the Human Relations Commission (HRC), AHA, or HUD, depending upon the nature of the complaint. The HRC has statutory authority to make recommendations on the resolution of fair housing complaints in the City. OCS is reachable at:

55 Trinity Avenue, Ste. 192, Atlanta, Georgia 30303; Phone 404-330-6023

XII. Public Accommodations

Pursuant to Section 94-68(a)(1) and (2), Unlawful Discrimination, in Article III, Non-discrimination in Public Accommodations of Part II of the Code of Ordinances for the City of Atlanta, Georgia, the City does not deny, refuse, or reject the use of any public facility based on race, color, creed, religion, sex, domestic relationship status, parental status, sexual orientation, national origin, gender identity, age, disability, or the use of trained dog guide by a blind, deaf or otherwise physically disabled person.

The City does not discriminate on the basis of disability in admission to, access to, or operations of its programs, services, or activities and the City Hall complex provides reasonable accommodations for prospective grant applicants with disabilities. Individuals who need assistance should contact the Office of Enterprise Assets Management at 404-330-6225, or dial 711 to connect to the City 404-330-

The City has adopted a Section 504 Effective Communication Policy as a requirement per a former Voluntary Compliance Agreement with HUD. The adopted policy addresses the methods by which the City will communicate with persons with disabilities and accommodate persons needing assistance, as well as the City's notice of non-discrimination. The City's Section 504 Effective Communication Policy/ADA compliance can be located at www.atlantaga.gov, or by contacting the Office of Enterprise Assets Management at 404-330-6225.

XIII. Anti-Displacement

As part of the implementation steps of the Con Plan, the City will comply with all requirements of the Uniform Relocation Assistance Act (URA), passed by Congress in 1970. The URA is a federal law that establishes minimum standards for federally funded programs and projects that require acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The URA protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects.

The City will take the needed steps to assure that the objectives of the URA are achieved where displacement activities are required. The URA objectives are:

- To provide uniform, fair and equitable treatment of persons whose real property is acquired or who are displaced in connection with federally funded projects;
- To ensure relocation assistance is provided to displaced persons to lessen the emotional and financial impact of displacement;
- To ensure that no individual or family is displaced unless decent, safe, and sanitary (DSS) housing is available within the displaced person's financial means; and,
- To encourage and expedite acquisition by agreement and without coercion.