



**CITY OF JOPLIN, MISSOURI CITIZEN  
PARTICIPATION PLAN 2017**

## OVERVIEW

The City of Joplin, Missouri is required to adopt a citizen participation plan that sets forth the jurisdiction's policies and procedures for citizen participation per Development Act of 1974 (42 U.S.C. 5340(A)(3)). The City of Joplin is required to follow the citizen participation requirements per 24 CFR Parts 91.100 and 91.105. The following plan incorporates all requirements set forth in 42 U.S.C. 5340(A)(3), Missouri Statute Chapter 610, and City of Joplin Council Resolution NO. 2004-038.

This citizen participation plan encourages citizens to participate in the development of the Consolidated Plan, any substantial amendments to the Consolidated Plan, the Annual Action Plan, any substantial amendments to the Annual Action Plan, the Affirmatively Furthering Fair Housing (AFFH) and Assessment of Fair Housing (AFH) Plan, and annual performance reports (CAPER).

There are numerous groups particularly targeted for participation including low- and moderate-income persons, minorities, non-English speaking persons, and persons with disabilities.

The citizen participation plan is broken down into the following sections:

- **Consolidated Plan**
- **Annual Action Plan**
- **Amendments to the Consolidated Plan and/or Annual Action Plan**
- **Affirmatively Furthering Fair Housing (AFFH) & Assessment of Fair Housing (AFH) Plan**
- **Performance Reports**
- **Displacement**
- **General Process**

## CONSOLIDATED PLAN

There are several requirements included as a part of this plan to encourage citizen participation in the development of the Consolidated Plan. The City initially shall make available to citizens, public agencies, and other interested parties information that includes the amount of assistance the jurisdiction expects to receive including grant funds and program income and the range of activities that will be undertaken. This shall also include the estimated amount that will benefit persons of low-to-moderate income households. To attain this goal, the City shall complete the following items:

- Publish a statement of intent and notice of public hearing on an annual basis in the local newspaper of greatest circulation at least fifteen (15) days prior to the public hearing.
- Hold a public hearing inviting input on the Needs Assessment, Proposed Activities, and Strategy portions of the Consolidated Plan.
- Provide information to social service agencies, churches, housing agencies, and other not-for-profit organizations regarding the program and invite input.

Once the Consolidated Plan is completed, the City shall make the document available to the public and provide reasonable opportunity for organizations to examine the content and provide comment on the Plan. To reach this goal, the City shall complete the following items:

- Publish a summary of the Consolidated Plan in the local newspaper of greatest circulation inviting public comment for a period no less than thirty (30) calendar days.
- Make copies of the proposed Consolidated Plan available at public libraries, government offices, and other public places.

The City shall prepare a summary of public comments received and a summary of any comments not accepted into the plan and the reasons therefore, which shall be incorporated as a part of the final Consolidated Plan.

This summary shall include, at minimum, the purpose and contents of the Consolidated Plan and shall include a list of the locations where copies of the entire proposed Consolidated Plan may be examined. Additionally, the Plan shall be made available electronically at no cost as the first option to organizations requesting copies (one copy per organization). The hard copies may be provided upon request at no cost to agencies or citizens that do not have electronic viewing capabilities.

There are several groups<sup>1</sup> that will specifically be included in the citizen participation process as follows:

- Homelessness Strategy and Resources: When developing this portion of the Consolidated Plan, the City shall consult with the Homeless Coalition of Southwest Missouri (CoC), area health-care facilities, and area business and civic leaders.
- Lead-based Paint: When preparing the portion of the Consolidated Plan, the City shall consult with state or local health and child welfare agencies and examine existing data related to lead based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead poisoned.
- Priority Non-Housing Needs: When preparing the description of the non-housing priority needs, the City shall consult with adjacent local governments when possible or applicable for needs and services that involve multiple jurisdictions.
- Public Housing: When preparing the public housing section of the Consolidated Plan, the City shall consult with the local public housing agency to identify needs and strategies to address those needs.
- Other Topics/Issues: In developing the plan, the City will also consult with the Joplin Area Transportation Study Organization (MPO) to determine transportation, accessibility, and other region-wide issues.

Once the citizen participation and public comment period have been completed, the City will submit the final Consolidated Plan at least forty-five (45) days before the start of the program year.

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<sup>1</sup> See 24 CFR 91.100 (a)(1)

## ANNUAL ACTION PLAN

The Annual Action Plan is a one-year plan that implements the Consolidated Plan. The Annual Action Plan includes funding priorities and expected accomplishments from each project. There are several requirements included as a part of this plan to encourage citizen participation in the development of the Annual Action Plan. The City initially shall make available to citizens, public agencies, and other interested parties information that includes the amount of assistance the jurisdiction expects to receive including grant funds and program income and the range of activities that will be undertaken. This shall also include the estimated amount that will benefit persons of low-to-moderate income households. To attain this goal, the City shall complete the following items:

- Publish a statement of intent and notice of public hearing on an annual basis in the local newspaper of greatest circulation at least fifteen (15) days prior to the public hearing.
- Hold a public hearing inviting input on the Expected Resources, Annual Goals and Objectives, and Projects portions of the Annual Action Plan.
- Provide information to social service agencies, churches, housing agencies, and other not-for-profit organizations regarding the program and invite input.

Once the Annual Action Plan is completed, the City shall make the document available to the public and provide reasonable opportunity for organizations to examine the content and provide comment on the Plan. To reach this goal, the City shall complete the following items:

- Publish a summary of the Annual Action Plan in the local newspaper of greatest circulation inviting public comment for a period no less than thirty (30) calendar days.
- Make copies of the proposed Annual Action Plan available at public libraries, government offices, and other public places.

This summary shall include, at minimum, the purpose and contents of the Annual Action Plan and shall include a list of the locations where copies of the entire proposed Annual

Action Plan may be examined. Additionally, the Plan shall be made available electronically at no cost as the first option to organizations requesting copies (one copy per organization). The hard copies may be provided upon request at no cost to agencies that do not have electronic viewing capabilities.

The City shall consider all comments which are received in writing or orally at the public hearing in preparing the final Annual Action Plan. To accomplish this goal, the City shall prepare a summary of public comments received, and a summary of any comments not accepted into the plan and the reasons therefore, which shall be incorporated as a part of the final Annual Action Plan.

Once the citizen participation and public comment period have been completed, the City will submit the final Annual Action Plan at least forty-five (45) days before the start of the program year.

## **CONSOLIDATED PLAN AND ANNUAL ACTION PLAN AMENDMENTS**

### **SUBSTANTIAL CHANGE**

Per 24 CFR §91.505, the Consolidated Plan and/or Annual Action Plan must be amended when one (1) or more of the following three (3) criteria are met:

1. Substantial change in the Grantee's fund allocation priorities or a substantial change in the method of distribution of funds;
2. To carry out an activity not previously included in the Annual Action Plan, using funds from any program or activity covered by the Consolidated Plan; or
3. To substantially change the purpose, scope, location, or beneficiaries of an activity approved as part of the Annual Action Plan.

The criteria to determine what actions constitute a substantial change shall be as follows:

- A substantial change in regard to criteria #1 will occur in the event that the process of citizen input or decision making is significantly altered such as revision of program year dates.
- A substantial change in regard to criteria #2 will occur in the event that a proposed new activity exceeds 10% of program funds.
- A substantial change in regard to criteria #3 will occur in the event that:
  - An approved activity is significantly altered in scope and changes the overall purpose of the approved activity or results in an expansion of the activity's original budget by more than 50%.
  - An approved activity is significantly altered to include new project elements not previously approved constituting more than 50% of the project.
  - The beneficiaries are significantly altered by excluding a group previously considered to be a beneficiary group of the approved activity.

## **PROCESS FOR AMENDMENT**

Once a substantial change has been determined, the City will adhere to the following procedure:

- Publish a statement of intent and notice of public hearing in the local newspaper of greatest circulation at least fifteen (15) calendar days prior to the date of the public hearing.
- Hold a public hearing inviting input regarding the proposed amendment.
- Accept public comments for a period not less than thirty (30) calendar days on the substantial amendment following the public hearing. Any comments received either written or orally at the public hearing and during the thirty-day (30) comment period shall be considered in preparing the substantial amendment. A

summary of these comments or views and a summary of the views not accepted and the reasons therefore shall be attached to the final amendment.

- The draft amendment shall be presented to the City’s governing body for adoption by ordinance.
- The draft substantial amendment will be submitted through IDIS, and a physical copy of the amended plan and ordinance will be sent to HUD for approval.

The Consolidated Plan and/ or Annual Action Plan Amendment will be deemed approved sixty (60) calendar days after it is submitted to HUD unless the City is notified of disapproval prior to that time. However, implementation of a Consolidated Plan and/or Annual Action Plan Amendment by the Grantee can occur more quickly with express permission from HUD on acceptance of the Amendment.

### **SUBSTANTIAL CHANGE DISASTER RESPONSE - PROCESS OF AMENDMENT**

For all amendments as a result of a declared disaster or emergency that meet the criteria for substantial change to the Consolidated Plan or Annual Action Plan the City will adhere to the nominal requirements for substantial amendment under 24 CFR 91.105 of one 30 day public comment period prior to approval by City Council. Reasonable notice of opportunity to comment will be reduced to posting comment period dates and time a minimum of 24 hours prior to comment period on the City of Joplin website.

Any further reductions in citizen participation will be authorized by waiver issued, or approved upon request by an authorized City Official, by the U.S. Department of Housing and Urban Development.

### **NON-SUBSTANTIAL CHANGE**

A non-substantial change is defined as any change or alteration that will not constitute a substantial change as defined above under SUBSTANTIAL CHANGE. Examples of non-substantial change may include cancellation of a previously approved activity due to unforeseen circumstances that have caused significant delays or unreasonable cost burdens, removal and reallocation of funds remaining after an activity is completed as approved, and increase of activity budget to make up the shortage to secure a contract. The City (Grantee) Staff responsible for overseeing and managing the CDBG Program will



have authority to approve and implement non-substantial changes on an as- needed basis as part of the CDBG program administration.

## **AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH) & ASSESSMENT OF FAIR HOUSING (AFH) PLAN**

On March 14, 2016, the Department of Housing and Urban Development (HUD) issued a notice providing guidance to cities incorporating the 24 CFR Part 5 Affirmatively Furthering Fair Housing rule into the requirements of 24 CFR 91.10 – Consolidated Program Year and 24 CFR 91.115 – for the Citizen Participation Plan. The new AFFH rule requires cities to set forth a meaningful and transparent process to identify and understand local and regional fair housing issues and set goals for improving fair housing choice and access to opportunity. The City of Joplin will partner with the Joplin Public Housing Authority to complete the Assessment of Fair Housing (AFH).

The goal of the AFFH rule is to utilize local and regional data to better understand fair housing issues and to establish fair housing priorities and goals. Such data is intended to make participants better able to evaluate fair housing issues, including: segregation, conditions that restrict fair housing choice, and disparities in access to housing and opportunity. To reach this goal, the City shall complete the following items:

1. Publish a statement of intent and notice of public hearing in the local newspaper of greatest circulation at least fifteen (15) days prior to the public hearing.
2. Hold a public hearing inviting input on fair housing issues and needs.
3. Provide information to social service agencies, churches, housing agencies, and other not-for-profit organizations regarding the AFFH rule and the AFH plan and invite input.

4. Publish a summary of the Assessment of Fair Housing in the local newspaper of greatest circulation inviting public comment for a period no less than thirty (30) calendar days.

Once the citizen participation and public comment period have been completed, the City of Joplin, Missouri will submit the final Assessment of Fair Housing plan to the Department of Housing and Urban Development.

## PERFORMANCE REPORTS

The final aspect of citizen participation relates to the performance of the program. The City will adhere to the following process:

- Publish a statement of intent and notice of public hearing in the local newspaper of greatest circulation at least fifteen (15) calendar days prior to the public hearing.
- Hold public hearing inviting input regarding the final performance report, officially titled Consolidated Annual Performance and Evaluation Report (CAPER), for the previous program year.

Public comments will be accepted for a period not less than fifteen (15) calendar days to receive comments on the draft CAPER. Any comments received either written or orally at the public hearing shall be considered in preparing the final performance report. A summary of these comments or views and a summary of the views not accepted and the reasons therefore shall be attached to the final report.

This public hearing shall be held annually not more than ninety (90) calendar days after the completion of the most recent program year, which shall outline the status of all activities as of the end of the § 570.507.

In addition to the performance report, the City shall submit the following reports, as part of the requirement for the CDBG program. These reports are not subject to citizen review:

- Equal Employment Opportunity Reports (HUD/EEO-4) as of June 30.
- Semi-Annual Labor Standards Enforcement Reports April 1<sup>st</sup> and October 1<sup>st</sup> of each program year.
- Minority Business Enterprise Reports on April 30 and October 31 of each program year.

## **DISPLACEMENT**

The City of Joplin does not intend to undertake any activities funded by the U.S. Department of Housing and Urban Development (HUD) that would cause either temporary or permanent displacement of an individual or family. However, the City is required to have a Plan in place should such an event occur.

The Plan contains of three major components.

### **ONE-FOR-ONE REPLACEMENT OF LOW AND MODERATE-INCOME DWELLING UNITS**

All occupied and vacant occupiable low and moderate-income dwelling units that are demolished or converted to a use other than as low/moderate-income housing as a direct result of any activity assisted under the Section 104(d) of the Housing and Community Development Act of 1974, as amended, will be replaced with low and moderate-income dwelling units within three years of commencement of the activity.

### **RELOCATION ASSISTANCE**

The City of Joplin will ensure that relocation assistance is provided as described in 24 CFR 507.606 to each low to moderate-income person who is displaced by the demolition or by the conversion of a low/moderate income dwelling unit to another use as a direct result of a CDBG assisted activity. When needed, relocation notices will be distributed to the affected persons in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

## **STEPS TO MINIMIZE DISPLACEMENT**

The City of Joplin will take the following steps to minimize the involuntary displacement of lower-income persons when CDBG funds are involved:

- All CDBG or HOME applications will be reviewed to determine whether involuntary displacement is likely to occur. Those applications involving displacement will receive a lower priority recommendation for funding unless it can be shown that alternatives are not available.
- Applicants who utilize CDBG or HOME funds to rehabilitate or convert a lower-income unit to a non-residential use will be required to supply replacement housing as well as relocation assistance.
- The cost of any required relocation assistance and the provision of replacement housing will be borne by the applicant.

The City will also use the applicable HUD Brochures to inform residents/ businesses of their rights

## **GENERAL PROCESSES**

### **PUBLIC HEARING**

The following procedures shall be followed regarding public hearings:

- No less than fifteen (15) calendar days' notice will be provided to the public for a public hearing.
- Public hearings shall be advertised in the local newspaper of greatest circulation. The notice will include adequate information regarding the subject of the hearing to encourage informed comment.

- All public hearings shall be held at times and locations convenient to potential attendees. If you are in need of disability related auxiliary aids or services, contact our ADA Coordinator at 624-0820, Ext. 210, or the City Clerk's Office at 624-0820, Ext. 220. Kindly give us forty-eight (48) hours' notice to arrange for the aids or services. TTD Number: 417-625-4774.
- If a public hearing is planned and it can be reasonably anticipated that a significant number of non-English speaking participants will be in attendance, the City requests that the neighborhood designate a translator. If the neighborhood is unable to or prefers not to provide their own translator, and the City is given five (5) work days prior to the hearing, the City will provide reasonable accommodation.

## **ACCESS TO RECORDS**

The City shall provide that citizens, public agencies, and other interested parties have reasonable and timely access to information and records pertaining to the City's Consolidated Plan and projects for a minimum of the preceding five (5) years.

Requests for access to records shall adhere to the following process:

- An open records request for access shall be required and shall be submitted to the City of Joplin City Clerk's Office or the Community Development Office, depending on the nature of the information requested.
- Legal staff shall review the written request for legality under the Sunshine Law.
- When possible, the City shall provide access to the information within two (2) weeks. Files will not be permitted to be taken off site; however, copies will be made available based on the current nominal fee per page in accordance with City of Joplin Resolution 2004-038 and Missouri State Statute 610.

## **TECHNICAL ASSISTANCE**

The Community Development Department is available to work with organizations and individuals representing low and moderate-income people who are interested in applying to obtain funding for a project. Technical assistance will also be provided on the requirements of the CDBG and HOME programs, such as Davis- Bacon Fair Labor Standards, environmental policies, fair housing and equal opportunity requirements, and income documentation. All potential applicants for funding are encouraged to contact the Community Development Department for guidance and feedback on potential or proposed projects.

The Community Development Department is located at:

City of Joplin  
602 S Main St.  
Joplin, MO 64801

## **COMPLAINTS**

If a citizen complaint is received regarding the Consolidated Plan, Annual Action Plan, Plan Amendments, Performance Reports, or the Citizen Participation Plan, the City will adhere to the following process:

Complaints must be submitted in writing to the City. The letter can be submitted in person or mailed to the Community Development Office.

All complaints will be initially responded to in writing within fifteen (15) calendar days and resolved, if possible, within thirty (30) calendar days.