



City of Little Rock

Consolidated Plan Citizen Participation Plan

Introduction

The Citizen Participation Plan (CPP) sets forth the City of Little Rock's policies and procedures for citizen participation, per federal U.S. Department of Housing and Urban Development (HUD) regulations at 24 CFR 91.105, related to the Assessment of Fair Housing and Consolidated Planning Process for the Community Planning and Development Programs. The four (4) formula grant programs are Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons With AIDS (HOPWA).

The City of Little Rock will develop their Consolidated Plan with the following grant programs: Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Housing Opportunities for Persons With AIDS (HOPWA) and in 2020, a supplemental allocation of CDBG and HOPWA funds which will be available under the Coronavirus Aid, Relief, and Economic Security (CARES Act).

The CPP encourages citizen participation in the Consolidated Planning process from its initiation. The process outlines the procedures for community approval of the Consolidated Plan, for addressing concerns, complaints, and for making amendments to the plan after approval. The development of the Assessment of Fair Housing (AFH), any revisions to the AFH, and the Consolidated Annual Performance and Evaluation Report (CAPER) also adhere to the procedures for citizen involvement.

The Citizen Participation process is designed to encourage all citizens including persons of low to moderate income, minorities, non-English speaking persons, persons with disabilities, residents of low to moderate income areas where housing and community development funds may be spent, and residents of public and assisted housing to participate in determining housing and community development needs within their communities.

Participation by low and moderate-income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and residents of predominantly low and moderate-income neighborhoods, as defined by the City is encouraged. The City defines low-income areas as those where 51% or more of the persons living in the area (i.e., census tract) whose incomes at or below 80% of the area median income. The City uses the most current tract data to determine the LMI areas.

Note: The City of Little Rock makes available maps with the locations of the low to moderate income areas in the City.



Encouraging Citizen Participation

The Consolidated Plan is designed to summarize the City's overall strategy for coordinating federal and other housing and community development resources to provide decent housing, establish and maintain a suitable living environment, and expand economic opportunities, particularly for low-and moderate-income persons.

Individuals and interested groups such as local and regional institutions, CoC, nonprofits, other organizations, public housing agencies and residents are encouraged to provide input into all aspects of the City's Consolidated Planning activities. This consists of assessing needs to setting priorities through performance evaluation. By following the CPP, there are numerous opportunities for citizens to contribute information, ideas and opinions about ways to improve our neighborhoods, promote housing affordability and enhance the delivery of public services to local residents will occur.

The City of Little Rock is committed to keeping all interested groups and individuals informed of each phase of the Consolidated Planning process and of activities being proposed or undertaken under HUD formula grant programs. Opportunities to comment on or participate in planning community development and affordable housing activities and projects will be publicized and disseminated throughout the City of Little Rock

Public Hearings and Meetings

Official notice of public hearings and meetings will be published in the Arkansas Democrat Gazette, posted on the City's website, posted at the public meeting locations and also distributed through regular mail to over 500 person from the City's contact list.

The City will conduct at least two (2) public hearings to obtain citizens' views and to respond to proposals and questions. The hearings will take place at different stages of the Consolidated Planning process. At least one will occur prior to development of the Draft Plan and will be intended to solicit public input regarding distinct issues, thereby aiding policy formation. At least one more will occur after the Draft Plan has been released for public review, allowing interested parties an opportunity to review the strategies and how they were developed, designed and presented. Other public meetings may be held as necessary.

Information about the time, location and subject of each hearing will be provided to citizens at least seven (7) calendar days prior to the meeting. Every effort will be made to ensure the public hearings and meetings are inclusive. Hearings and meetings will be held at convenient times and locations and in places where people most affected by proposed activities can attend. These sites are wheel chair accessible and reasonable accommodation for persons with mobility impairments will be provided. At least two business days advance notice is required to make accommodations.



It is the policy of the City of Little Rock to take reasonable steps to assist the participation of non-English speaking persons and persons with visual and / or hearing impairments. Interpreters will be provided at public hearings where a significant number of non-English speaking residents can be reasonably expected to participate. All public hearings and public meetings associated with the Consolidated Planning process will conform to applicable Arkansas public meeting laws.

If virtual hearings are used, real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Also the virtual hearing method will only be used in lieu of in-person hearing if national or local health authorities recommend social distancing and limited public gatherings for public health reasons.

Publication of Consolidated Plan Documents

The Draft Consolidated Plan will be published for public review in a manner that affords citizens, public agencies and other interested parties a reasonable opportunity to examine its contents and submit comments. The Draft Plan will be a complete document and shall include:

- The amount of assistance (grant and program income) expected to receive.
- The range of activities that may be undertaken and estimated amount of assistance proposed to be used for activities that will benefit low and moderate-income persons.
- Any proposed activities likely to result in displacement and the City of Little Rock's plan for minimizing displacement.

A concise summary of the Draft Plan will be published in Arkansas Democrat Gazette at the beginning of the public comment period. The summary will describe the contents and purpose of the Consolidated Plan (including a summary of specific objectives and proposed usage) and include a list of the locations where copies of the entire proposed Consolidated Plan may be obtained or examined. The following are the locations where copies of the Draft Plan will be made available for review:

- Housing & Neighborhood Programs, 500 W. Markham, Suite 120W
- Capitol View/Stift Station Neighborhood Resource Center, 2715 W. 7th Street
- East of Broadway Neighborhood Resource Center, 500 East 21st Street
- South End Neighborhood Resource Center, 1100 West 33rd Street
- Valley Drive Neighborhood Resource Center, 5621 Valley Drive
- Willie Hinton Neighborhood Resource Center, 3805 West 12th Street
- Oak Forest Neighborhood Resource Center, 2823 Tyler Street
- Wakefield Neighborhood Resource Center, 7414 Doyle Springs Road
- West Baseline Neighborhood Resource Center, 9209 Mann Road
- West Central Neighborhood Resource Center, 4200 Barrow Road, Suite C
- Wright Avenue Neighborhood Resource Center, 1813 Wright Avenue
- Baseline Neighborhood Resource Center, 4600 Baseline Road



- Central AR Library System, Main Library, 100 Rock Street
- Terry Library, 2015 Napa Valley Drive
- Williams Library, 1800 S. Chester Street
- Fletcher Library, 823 N. Buchanan Street
- Dee Brown Library, 6325 Baseline Road
- McMath Library, 2100 John Barrow Road
- Thompson Library, 38 Rahling Circle
- Rooker Library, 11 Otter Creek Court

Citizens and groups may obtain a reasonable number of free copies of the proposed Consolidated Plan by contacting the Community Development Manager or Community Development Planner at (501) 371-6825 or the document may be downloaded from the City's website at <https://www.littlerock.gov/city-administration/city-departments/housing-and-neighborhood/>.

Public Comments on the Draft Consolidated Plan and Annual Action Plans

The City of Little Rock's Community Development Division will receive comments from citizens on its Draft Plan for a period not less than thirty (30) days prior to submission of the Consolidated Plan, Annual Action Plans, or any substantial amendments to HUD.

All comments or views of citizens received in writing and/ or orally during the thirty (30) day comment period will be considered in preparing the final Consolidated Plan. A summary of these comments or views and a summary of any comments or views not accepted and the reasons therefore shall be attached to the final Consolidated Plan or Annual Action Plan.

For CDBG, HOME, and HOPWA funding under FY 2019, FY 2020, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, City may provide a 5-day notice/comment period of proposed changes beginning April 9, 2020 as allowed under a HUD waiver. This includes any new activities proposed. A public hearing is not required but documentation relative to substantial amendment activity planning applies.

Public Notice and Outreach

An informed community is critical to effective and responsive housing and community development programs. Efforts to educate residents and empower their participation are an ongoing element of the Consolidated Planning process.

As the fundamental means of notifying interested citizens about the Consolidated Plan and related activities, such as the Annual Action Plan or the Consolidated Annual Performance and Evaluation Report, the Community Development Division will utilize advertisement notices in the Arkansas Democrat Gazette. Such notices will be published at least seven (7) calendar days prior to public hearings. All notices will be written in plain,



simple language and direct efforts will be undertaken to publish and / or post information at locations that will elicit maximum low-and moderate-income and minority participation.

Public education and outreach will be facilitated through the use of Public Advertisements that describe the Consolidated Planning process, opportunities for citizen participation and available funding through the CDBG, HOME, and HOPWA programs; The City's Consolidated Plan mailing list will likely include social service organizations, local jurisdictions, low-income housing consumers, neighborhood groups, previous participants and commentators, and others expected to desire input on the Plan. This list is updated periodically and is available for inspection at the Community Development Division office.

Technical Assistance

Groups or individuals especially representing low to moderate income persons interested in obtaining technical assistance in commenting on the AFH, developing and applying proposals for funding assistance through HUD formula grant programs covered by the Consolidated Plan may contact the Community Development Manager at 501-371-6825 or at City of Little Rock, Department of Housing and Neighborhood Programs, Suite 120W, Little Rock, AR 72201.

An assessment of the type and extent of technical assistance needed by the groups or individuals will be made by City's staff upon request and in a timely manner. The City will make a good faith effort to see that reasonable requests for technical assistance are responded to in a timely manner.

Amendments to the Consolidated Plan

Pursuant to HUD regulations, an amendment to the Consolidated Plan is required whenever the Jurisdiction determines to:

- Substantially change the allocation priorities or its method of distributing HUD formula grant funds;
- Utilize formula grant funds (including program income) to carry out activities not previously described in the Action Plan; and,
- Change the purpose, scope, location or beneficiaries of an activity.

Such changes, prior to their implementation, are reviewed under various federal or local requirements, particularly rules on procurement and / or policies on the allocation of public resources. Substantial amendments to the Consolidated Plan are, in addition, subject to a formal citizen participation process.

Reasonable advance notice and the opportunity to comment will be given to citizens through public notices in the Arkansas Democrat Gazette newspaper and other appropriate means, such as direct mail, posting to our website, and public hearing. A public comment period not less than thirty (30) days will be provided prior to implementing



any substantial amendment to the Consolidated Plan. Community Development Division will prepare a summary of all comments received in writing and, in cases where any citizens' views are not accepted, provide reasons for the decision. This documentation will be attached to the substantial amendment, which will be available to the public and submitted to HUD.

For CDBG, HOME, and HOPWA funding under FY 2019, FY 2020, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, City may provide a 5-day notice/comment period of proposed changes beginning April 9, 2020 as allowed under a HUD waiver. This includes any new activities proposed. A public hearing is not required but documentation relative to substantial amendment activity planning applies.

Substantial Amendments

Occasionally, public comments warrant an amendment to the Consolidated Plan. Substantial Change” is defined by the City of Little Rock to be:

- A proposed new activity which cannot reasonably be construed to have been included within the programmatic intent of the adopted application or in the commitment of funds to a specific project;
- An activity that was identified in the adopted application, but which subsequently is proposed to be deleted;
- An activity that is proposed to be altered in terms of its purpose, scope, location, or beneficiaries to such an extent that it can no longer reasonably be construed as the activity reviewed by the public and approved by the Consolidated Plan Advisory Committee.
- The criteria to be used in determining if an activity is at risk of becoming substantially changed from its originally intended purpose will be based upon further Consolidated Plan Advisory Committee actions to modify/amend the Consolidated Plan proposed activities.
- City staff shall proactively monitor each funded project for compliance with its respective performance criteria and provide periodic progress reports to the Consolidated Plan Advisory Committee.
- Any activity that is judged to be at risk of substantially changing from its originally intended purpose, scope, location, or beneficiaries will be reviewed in a public hearing forum prior to a decision by the Consolidated Advisory Plan Committee as to whether the performance objectives of the project shall be amended.
- An application for a CDBG Section 108 Loan Guarantee.



Citizen Participation in the Event of a Substantial Amendment

In the event of a substantial amendment to the Consolidated Plan, the Community Development Division, depending on the nature of the amendment, will conduct at least one additional public hearing. This hearing will follow a comment period of no less than thirty (30) days, where the proposed substantially amended Consolidated Plan will be made available to interested parties. Citizens will be informed of the public hearing through newspaper notification prior to the hearing, and the notice will appear in at least one newspaper which is circulated city-wide.

For CDBG, HOME, and HOPWA funding under FY 2019, FY 2020, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, City may provide a 5-day notice/comment period of proposed changes beginning April 9, 2020 as allowed under a HUD waiver. This includes any new activities proposed. A public hearing is not required but documentation relative to substantial amendment activity planning applies.

Performance Reports

Current regulations require that the City prepare and submit to HUD a Consolidated Annual Performance and Evaluation Report (CAPER) 90 days after the end of the program year. The CAPER allows HUD, local officials, and the public to evaluate the City's overall performance, including whether activities and strategies are undertaken during the preceding year actually made an impact on the goals and needs identified in the five-year Consolidated Plan and Annual Action Plan.

The citizen participation plan must provide a period, not less than 15 days, to receive comments on the annual performance report that is to be submitted to HUD before its submission. The CPP shall require the jurisdiction to consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report. A summary of these comments or views shall be attached to the performance report

Complaints and Grievances

Citizens, administering agencies and other interested parties may submit complaints and grievances regarding the Consolidated Plan. Any formal complaint should be in writing, specific in their subject matter, and include facts to support allegations. The following are considered to constitute complaints to which a response letter is due:

- The administering agency has purportedly violated a provision of this Citizen Participation Plan.
- The administering agency has purportedly violated a provision of the CDBG, HOME,



HOPWA program regulations.

- The administering agency, or any of its contractors, has purportedly engaged in questionable practices resulting in waste, fraud or mismanagement of any program funds.

Residents may also present complaints and grievances orally or in writing at the community meetings and / or public hearings. All public comments, including complaints and grievances, made either orally or in writing with the thirty (30) day public comment period, will be included in the final Consolidated Plan. Such complaints or grievances shall be directed to the City's Community Development Manager.

Timely Response to Complaints or Grievances

Citizens are urged to bring any concerns they may have regarding the Consolidated Plan to the attention of the City of the Little Rock, Department of Housing and Neighborhood Programs by calling 501-371-6825. It is anticipated that most concerns can be quickly and successfully addressed through direct conversation. Unresolved issues, complaints, or grievances may be formally submitted to the following address:

City of Little Rock
Department of Housing and Neighborhood Programs
Attn: Community Development Division
500 W. Markham, Suite 120W
Little Rock, AR 72201

Upon receipt of a written complaint, the Community Development Manager shall respond to the complainant. The time required to respond may vary depending upon the nature and complexity of the specific complaint. Where practicable, written response will be provided within fifteen (15) working days and maintain a copy of all related correspondence. If, due to unusual circumstances, and not able to respond within prescribed time limit, the limit may be extended by written notice to the complainant. The Community Development Manager's notice must include the reason for the extension and the date on which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

Public review materials and performance reports will include data, as appropriate under confidentiality regulations, on any written complaints received and how each was resolved.

Activities Exempt from Substantial Amendment Citizen Participation Requirement--Disaster/Emergency

It may be necessary to amend the Consolidated Plan in the event of an emergency such as a man-made disaster, natural disaster, terrorism, or COVID-19. These amendments may include funding new activities and / or the reprogramming of funds including



canceling activities to meet community development needs that have a particular urgency. Therefore, the City of Little Rock, acting through the Community Development Division may utilize its CDBG, HOME, or HOPWA funds to meet need resulting from a declared disaster or emergency without the normal public comment period, which is otherwise required for substantial amendments.

For CDBG, HOME, and HOPWA funding under FY 2019, FY 2020, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, City may provide a 5-day notice/comment period of proposed changes beginning April 9, 2020 as allowed under a HUD waiver. This includes any new activities proposed. A public hearing is not required but documentation relative to substantial amendment activity planning applies.

Activities Exempt from Substantial Amendment Citizen Participation Requirement--Urgent Needs

It may be necessary to amend the Consolidated Plan in the event of an emergency such as a natural disaster. These amendments may include funding new activities and / or the reprogramming of funds including canceling activities to meet community development needs that have a particular urgency. Therefore, the City of Little Rock, acting through the Community Development Division may utilize its CDBG, HOME, or HOPWA funds to meet an urgent need without the normal public comment period, which is otherwise required for substantial amendments.

To comply with the national objective of meeting community development needs having a particular urgency, an activity will alleviate existing conditions that the City of Little Rock certifies:

- Pose a serious and immediate threat to the health and welfare of the community;
- Are of recent origin or recently became urgent;
- The City and the Community Development Division are unable to finance the activity on their own; and,
- Other resources of funding are not available to carry out the activity.

A condition will generally be considered to be of recent origin if it is developed or became critical within eighteen (18) months preceding the Community Development Division's certification;

If HUD allows, such as through a waiver, activities under the urgent need national objective to be funded without the requirement that the City is unable to finance the activity on its own and other resources of funding are not available to carry out the activity, the Community Development Division will only certify that the activity poses a serious and immediate threat to the health and welfare of the community and is of recent origin or recently became urgent.



Urgent need activities may include, but not limited to, the following:

- Clearance of debris;
- Provision of extra security patrols;
- Demolition, clearance and/or reconstruction of damaged property posing an immediate threat to public safety;
- Emergency reconstruction of essential water, sewer, electrical, medical, and telephone facilities;
- Emergency repair of streets and sidewalks; and,
- Providing a variety of relief services to individuals.

Assessment of Fair Housing

The City of Little Rock is required to complete an Assessment of Fair Housing/Analysis of Impediments (AI). The City will hold two (2) focus groups for city departments, bankers, public housing authority, nonprofits and other organization to receive input. The community meetings for the general public will be conducted in conjunction with the meeting for the Consolidated Plan to receive input on fair housing issues. The same method for public notice, outreach, and meeting the needs on non-English speaking residents for the Consolidated Plan Process will be conducted for the AI. The AI will be available for 30 days for comments. The AI goals and strategies will be included in the Consolidated Plan. Each year, the City will be required to report on the Fair Housing in the Consolidated Annual Performance and Evaluation Report (CAPER).

The Consolidated Planning Committee (CPC)

CPC members shall include representatives from the public, private and nonprofit sector that provide assisted housing, health services, social and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons), public housing, and metropolitan planning agencies (24 CFR 91.10)

CPC members shall also be representative of areas throughout the City. The members shall be appointed by the City Manager to staggered terms not exceeding three (3) years. The CPC shall elect a chairperson and vice chairperson.



Availability of the Citizen Participation Plan

Copies of the Citizen Participation Plan may be obtained by contacting the Community Development Manager at (501) 371-6825 or on the City's website at <https://www.littlerock.gov/city-administration/city-departments/housing-and-neighborhood/>.

Upon request, the Community Development Manager will make the Citizen Participation Plan available in an alternative format accessible to persons with disabilities.

Administrative Updates

Changes to the Consolidated Plan that do not meet the criteria for standard or substantial amendments and do not require citizen participation are defined as administrative updates. Examples of administrative updates include grammatical or structural edits that do not substantially change the scope or meaning of activity; and changes in the coding or eligibility determination of a project that does not change the scope, location, or beneficiaries.