



Citizen Participation Plan

Last Amended: November 24, 2015

Re-Amended: September 27, 2016

Re-Amended: April 28, 2020



Citizen Participation Plan for the City of Tuscaloosa

Revised on April 29, 2020 to:

- Include virtual hearings as an allowed method for citizen participation;
- Update the types of declared disasters or emergency events to include terrorism and infectious diseases, such as the recent coronavirus 19 (COVID 19) pandemic, that may necessitate expedited substantial amendments;
- Provide details on possible actions, including reprogramming of funding and types of possible activities, that may be undertaken in response to the COVID 19 pandemic;
- Includes provisions relative to Consolidated Plan citizen participation, Community Development Block Grant, and Emergency Solutions Grant waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;
- Make minor edits that do not change current citizen participation policies. Please be advised that if virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.

Please visit this webpage for future revisions to this plan.

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INTRODUCTION

The City of Tuscaloosa adopted its first Citizen Participation Plan in 1974 to formalize procedures for the involvement of city residents in the CDBG Program. The Plan has been revised several times as circumstances and regulations have changed.

The U.S. Department of Housing and Urban Development (HUD) previously consolidated the planning and application aspects of the CDBG, HOME, HMIS, and ESG programs and the requirements for the Comprehensive Housing Affordability Strategy.

Most recently, HUD completed its planning and reporting standards for the Assessment of Fair Housing. Since it is an entitlement city under the CDBG, HOME, HMIS, and ESG programs, the City of Tuscaloosa has now revised the Citizen Participation Plan to address the requirements for the Consolidated Plan, Action Plans, and the Assessment of Fair Housing (AFH).

This Citizen Participation Plan will outline the interventions the City of Tuscaloosa will use to overcome traditional barriers to participation to fully engage all populations during the planning and implementation of programs, projects, and activities of the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), Homeless Management Information System (HMIS), and Emergency Solutions Grant (ESG) programs.

APPLICABILITY

The City of Tuscaloosa Citizen Participation Plan is applicable to all activities, projects and programs funded wholly or in part by grants and loans administered by the U.S. Department of Housing and Urban Development, including but not limited to: The Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), Homeless Information System (HMIS) and the Emergency Solutions Grant (ESG). It is also applicable to the Assessment of Fair Housing (AFH) and the Consolidated Plan, which occurs every five years.

ADOPTION

Prior to the implementation of any portion of the Citizen Participation Plan, the original plan and any revisions and/or amendments must receive initial approval from the Community Development Committee of the City of Tuscaloosa. After the approval of the Community Development Committee, the City Council of the City of Tuscaloosa must provide final approval of the plan, revisions, and/or amendments. After the close of the requisite citizen comment period and the appropriate response of the City of Tuscaloosa, the Citizen Participation Plan as amended/revised shall be adopted for implementation.

ADMINISTRATION AND MANAGEMENT OF THE CITIZEN PARTICIPATION PLAN

The Office of Federal Programs (OFP) shall be responsible for the administrative oversight of the execution of procedures described within the Citizen Participation Plan. The Office of Federal Programs is responsible for ensuring that all HUD funded projects sponsored by the City of Tuscaloosa adheres to the Citizen Participation Plan. The Office of Federal will oversee any revisions and/amendments to the Citizen Participation Plan.

CITY OF TUSCALOOSA CITIZEN PARTICIPATION PLAN PURPOSE

The purpose of the Citizen Participation Plan is to formalize policy and procedure and articulate the city's commitment to the involvement of all city residents in all phases of implementation of Community Planning and Development Programs.

The Plan is intended to be responsive to changing community factors, federal regulations and to be utilized by program staff to help ensure City-wide program and project compliance.

The primary goal of the City's Citizen Participation Plan is to empower historically disadvantaged citizens (especially very low, low and moderate- income persons, minorities, persons with disabilities, senior, and non-English speaking persons) to actively participate in the development of their neighborhoods and community at large.

CITIZEN COMMENT PERIOD ON THE CITIZEN PARTICIPATION PLAN AND AMENDMENTS

The City of Tuscaloosa will provide 30 consecutive calendar days to receive comments from residents of the Tuscaloosa community on the Citizen Participation Plan and any subsequent amendments and/or revisions. **For CDBG Funding under FY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, the City of Tuscaloosa may provide a 5-day notice/comment period of a proposed substantial amendment beginning April 9, 2020 as allowed under a HUD waiver.**

The City of Tuscaloosa will consider all comments received in writing via email, fax, and mail or received orally (as transcribed by an OFP staff person) in preparation of the final Citizen Participation Plan.

Any comments and/or view received during the 30-day citizen comment period shall be attached to the Citizen Participation Plan prior to its submission to HUD.

The City of Tuscaloosa shall also attach a summary of any comments or views not accepted and the reasons why to the final Citizen Participation Plan.

CRITERIA FOR SUBSTANTIAL AMENDMENTS/REVISIONS TO THE CITIZEN PARTICIPATION PLAN

The following criteria will be deemed to constitute a substantial change and will require an amendment to the Citizen Participation Plan:

1. Changes in the length of citizen comment period
2. Inclusion of additional grants, reports, plans in subsequent Federal regulations and guidelines
3. **Disaster/Emergency events that may require expedited substantial amendments**

It may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared disaster or emergency. There are three types of disasters/emergency events that may necessitate an expedited substantial amendment including (1) Man-Made-disasters, (2) Natural disasters, and (3) Terrorism. Man-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc. Natural disasters can include earthquakes, tsunamis, hurricanes, tornadoes, wild fires,

flooding and public health issues such as wide-spread disease such as the recent coronavirus disease 2019 (COVID-19). Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc.

These expedited substantial amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet needs resulting from a declared disaster or emergency. Therefore, the City of Tuscaloosa may utilize CDBG, HOME, or ESG funds to meet these needs with a 5-day public comment period instead of a 30-day public comment period, which is otherwise required for substantial amendments. **For CDBG funding under FY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, the City of Tuscaloosa may provide a 5-day notice of a proposed substantial amendment beginning April 9, 2020 as allowed under a HUD waiver. Special ESG funding under the CARES Act referred to as ESG-CV to address the COVID-19 pandemic do not apply to citizen participation requirements that would otherwise apply to ESG funds; however, the City will publish how the ESG-CV funding has or will be used.**

With respect to a declared disaster, the City of Tuscaloosa may elect to use CDBG, HOME, or ESG funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal or local sources unless allowed by the federal government. Potential eligible uses of funds are those that are included in this Citizen Participation Plan, the Consolidated Plan, or any other CDBG, HOME, or ESG eligible use. HUD may provide new guidance on eligible uses in which the City will comply with and may utilize as well.

All eligible CDBG activities, including those to address declared disasters or emergencies, must meet one of three national objectives which are: (1) Benefit to low- and moderate-income (LMI) persons; (2) Aid in the prevention of slums or blight; and (3) Meet a need having a particular urgency (referred to urgent need). The City may carryout eligible CDBG activities to meet needs resulting from declared disasters or emergencies under any one of the three national objectives.

Responding to the COVID-19 Pandemic

The City may reprogram a percentage of FY 2019-2020 funding and utilize some of FY 2020-2021 and future CDBG, HOME, and ESG funding to respond to the COVID-19 pandemic.

Funding for activities that have required in-person interaction including, but not limited to, housing rehabilitation, handy worker programs, and a variety of community services may be reprogrammed into activities that allow for social distancing such as grab and go or home- delivered meal services, online programming for a variety of clientele including, but not limited to, youth and senior citizens, and various business and microenterprise assistance identified below to respond to or recover from the effects of the COVID-19 pandemic. Please see below for other possible activities that may be funded. Any other possible eligible activity not included below may also be considered. The City will coordinate with the local department of public health and local health clinics before undertaking any activity to respond to the COVID-19 pandemic.

Potential eligible CDBG Activities that may be undertaken to support the COVID-19 response include, but are not limited to:

- Building and Improvements, including Public Facilities such as constructing testing and diagnosis, or treatment facility; rehabilitation of a community facility to establish an infectious disease treatment clinic; acquisition and rehabilitation, or construction of a group living facility that may be used to centralize patients undergoing treatment; rehabilitation of a commercial building or closed school building to establish an infectious disease treatment clinic, e.g. by replacing the HVAC system; acquisition and rehabilitation of a

motel or hotel building to expand the capacity of hospitals to accommodate isolation of patients during recovery; or to make interim improvements to private properties to enable an individual patient to remain quarantined on a temporary basis;

- Assistance to Businesses, including Special Economic Development Activities such as providing grants or loans to support new business expansion to create jobs and manufacture medical supplies necessary to respond to infectious disease; avoid job loss caused by business closures related to social distancing by providing short-term working capital assistance to small businesses to enable retention of jobs held by low- and moderate-income persons; or to provide technical assistance, grants, loans, and other financial assistance to establish, stabilize, and expand microenterprises that provide medical, food delivery, cleaning, and other services to support home health and quarantine;
- Public Services such as job training to expand the pool of health care workers and technicians that are available to treat a disease within a community; provide testing, diagnosis or other services at a fixed or mobile location; increase the capacity and availability of targeted health services for infectious disease response within existing facilities; provide equipment, supplies, and materials necessary to carry out a public service; deliver meals on wheels to quarantined individuals that need to maintain social distancing due to medical vulnerabilities;
- Planning, Capacity Building, and Technical Assistance such as gathering data and developing non-project specific emergency infectious disease response plans; and
- Any other activity allowed under current CDBG regulations.

Urgent Need National Objective: To comply with the national objective of meeting community development needs having particular urgency, an activity will alleviate existing conditions that the City of Tuscaloosa 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 is unable to finance the activity on its 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 18 months preceding the City'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 City 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.

CITY OF TUSCALOOSA CITIZEN PARTICIPATION PLAN PROCEDURES

Strategies for Encouraging Citizen Participation

It is the intent of the City of Tuscaloosa to encourage and facilitate the participation of residents in the formulation of priorities, strategies, and funding allocations related to the development of the Consolidated Plan, AFH, Annual Action Plan, Consolidated Annual Performance and Evaluation Report (CAPER) and any revisions and/or amendments to these plans and reports.

The Citizen Participation Plan emphasizes the involvement of very low-to- moderate- income persons, especially those living in very low-to- moderate- income neighborhoods, public and assisted housing, or residing in areas where prospective programs and projects are slated for implementation. The City also encourages the participation of minority populations, including people who do not speak English and persons with disabilities.

The City affirms its commitment to encouraging citizen participation in the development of the aforementioned plans and reports in the following ways:

1. Consultation with local and regional institutions, Continuums of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community based and faith based organizations)
2. Consultation with Tuscaloosa Housing Authority and the residents of public and assisted housing developments (including resident advisory boards, resident councils, and resident management corporation)
3. Public Hearings on the Consolidated Plan, Annual Action Plan, AFH, and CAPER for Community Planning and Development Programs
4. Citizen Comment Periods for each plan, report and subsequent revisions and/or amendments under Community Planning and Development Programs
5. Exploration of alternative public involvement techniques and the quantitative measurement of involvement efforts

CONSULTATION

Consultation with Local and Regional Organizations

The City of Tuscaloosa recognizes that the involvement of local and regional institutions, Continuums of Care and other private, public and faith based organizations with expertise in certain areas of community development is crucial to identifying and prioritizing needs and developing a responsive and strategic plan of action. The following entities and persons will be consulted during the preparation of the City's Consolidated Plan, Annual Action Plan, Assessment of Fair Housing and other plans/reports:

1. The City will consult with public and private agencies that provide social services. These agencies include assisted housing, health services, and social services. Those agencies include, but are not limited to, Community Services Programs of West Alabama, Inc.; Turning Point, Inc., the Salvation Army, FOCUS on Senior Citizens of Tuscaloosa County, Inc., Agency on Aging and Temporary Emergency Services, Inc., Catholic Family Services and Alabama Department of Human Resources.

2. The City will consult the Tuscaloosa County Health Department as well as the University of Alabama's Safe State program when preparing the portion of the plan concerning lead-based paint hazards
3. The City will consult with representatives of the City of Northport and Tuscaloosa County concerning non-housing community development issues that also affects those jurisdictions.
4. The City will consult with the internal Transportation, Water and Sewer, Police, Fire, Inspection and Engineering Departments concerning community development needs in their individual areas of expertise.
5. The City will consult residents of Residents of low-income neighborhoods concerning development of their neighborhoods. Meetings will be held at neighborhood-based community facilities that are convenient to those residents.
6. The City will consult Community Affairs representatives of the University of Alabama, Stillman College and Shelton State Community College to determine opportunities for partnerships, economic and workforce development.
7. The City will consult the Tuscaloosa City Board of Education, Arts n' Autism, Tuscaloosa Children's Center, Boys and Girls Club, Big Brothers and Big Sisters in regard to holistic approaches to children's well-being.
8. The City will consult with the Tuscaloosa Police Department, Alabama Department of Corrections, Alabama Department of Juvenile Corrections, Alabama Probation and Parole-Tuscaloosa Office for input on proactive crime reduction solutions and strategies to achieve social justice through community development.
9. The City will consult with the YMCA of Tuscaloosa and Tuscaloosa Parks and Recreation Authority to develop solutions for recreational/lifestyle initiatives in the community at large.

Consultation with Tuscaloosa Housing Authority and Other Housing Assistance Organizations

1. The City will consult The Tuscaloosa Housing Authority (THA) concerning public housing needs. The City will also provide information to THA about housing and community development plan activities so that THA can make this information available at its annual public hearing required under the Comprehensive Grant Program.
2. The City will consult with other affordable housing organizations through Tuscaloosa City metro area to collaborate on long-range housing, rehabilitation and development. These agencies will include: Community Service Programs of West Alabama, Habitat for Humanity, Community Works, Project Blessings and independent developers.

PUBLIC HEARINGS

The following public hearings will be held to allow city residents, especially those of very low and low-income, to participate in the development of the Consolidated Plan and Annual Action Plan. Two public hearings will be held to allow citizens to identify housing and community development needs and to propose projects and programs for funding.

To ensure that the AFH is informed by meaningful community participation, the City will give reasonable opportunities for involvement in the development of the AFH and in the incorporation of the AFH into the Consolidated Plan. For the AFH, two public hearings and a community conversation meeting will be held.

All public hearings will be advertised a minimum of thirty (30) consecutive calendar days prior to the scheduled hearing date.

The advertisements will be made in the Tuscaloosa News, as an announcement on the OFP page of the City of Tuscaloosa website, and via postings throughout City Hall, and other public buildings throughout the community including but not limited to: the Tuscaloosa Public Library, The Weaver Bolden Branch of the Tuscaloosa Public Library, The Gateway: Alberta's Center for Technology, Tuscaloosa Parks and Recreation Building, Benjamin Barnes Branch YMCA and the Downtown Branch YMCA.

The publications will include a description of the respective plans to permit informed comment.

The hearings will be held in the City Council Chambers, the Narashino Conference Room, or the Daugherty Conference Room of City Hall, which are accessible to persons with disabilities.

During the public hearing, a staff member of the Office of Federal Programs will be available to address Tuscaloosa's housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH and a review of program performance.

1. The City of Tuscaloosa will hold two public hearings during the development of each plan- Consolidated Plan, Annual Action Plan, and AFH. One hearing will occur during regular working hours (8am-5pm) and the other hearing will be held after 5:00 p.m.
2. Each public hearing will be scheduled for 2 hours.
3. At each of these hearings, the City will provide information about its performance in the CDBG, HOME, HMIS, and ESG programs, the range of eligible activities, and the estimated amount of funds available for programs and projects undertaken.
4. Both public hearings will be held prior to the publication of the Consolidated Plan, Annual Action Plan, and AFH for the requisite 30-day citizen comment period.
5. A public hearing will be held prior to the submission of the City's Grantee CAPER for the Consolidated Plan to inform citizens concerning progress during the past program year and to solicit their concerns.

CITIZEN COMMENT PERIOD ON THE CONSOLIDATED PLAN, ANNUAL ACTION PLAN AND AFH

The City of Tuscaloosa will provide 30 consecutive calendar days for to receive comments from residents of the Tuscaloosa community on the Consolidated Plan, Annual Action Plan, AFH, and substantial amendments and revisions to the Consolidated Plan, Annual Action Plan and AFH.

The city of Tuscaloosa will consider all comments received in writing via email, fax, mail, and/or orally (as transcribed by an OFP staff person) at the public hearings, in preparation of the final Consolidated Plan, Annual Action Plan and AFH. Any comments received during the 30-day citizen comment period shall be attached to the Consolidated Plan, Annual Action Plan, and/or AFH prior to its submission to HUD.

The City of Tuscaloosa shall also attach a summary of any comments or views not accepted and the reasons why to the final AFH, Consolidated Plan and/or Annual Action Plan.

CITIZEN COMMENT PERIOD ON CAPER

The City of Tuscaloosa will provide 15 consecutive calendar days for the receipt of comments from residents of the Tuscaloosa community on the CAPER.

The City of Tuscaloosa will consider all comments received in writing via email, fax, mail and/or orally (as transcribed by an OFP staff person) at the public hearings, in preparation of the final CAPER.

Any comments received during the 15-day citizen comment period shall be attached to the CAPER prior to its submission to HUD.

The City of Tuscaloosa shall also attach a summary of any comments or views not accepted and the reasons why to the final CAPER.

ALTERNATIVE PUBLIC INVOLVEMENT METHODOLOGIES

Assessment of Needs and Provisions for Persons with Disabilities

The City of Tuscaloosa shall host all physical meetings and hearings in City owned buildings that are accessible to persons with physical disabilities. If a person requires additional accommodations, the person is encouraged to contact the Office of Federal Programs. For persons with hearing disabilities, The Office of Federal Programs will contact the University of Alabama to attempt to secure the services of an American Sign Language interpreter.

Assessing needs of Non-English Speaking Residents

The City of Tuscaloosa shall utilize the most recent U.S Census data, HUD-provided data, and community organization consultations to ascertain the need for the translation of notices and other vital documents.

Provisions for Non-English Speaking Residents

According to 2010 U.S. Census data, approximately 3% of the City's population is of Hispanic/ Latino descent and 1.8% is of Asian descent. Although the City has not received request for translation services, if such a case does arise, the City will make every possible effort to provide the requesting party with translation services such as a language interpreter and/or written materials in their preferred language.

Development of Consolidated Plan, Annual Action Plan, AFH and CAPER

The City of Tuscaloosa shall meet these minimum requirements for the development of the Consolidated Plan, Annual Action Plan, AFH, and CAPER:

1. The City of Tuscaloosa will make all HUD-provided data and any supplemental information that is incorporated in the Consolidated Plan, AFH, Annual Action Plan, and CAPER available to all interested parties.

This will be done in one of the following ways: via a cross-reference to the data on HUD’s website, listing of resources in the appendices of a plan/report or listing the resources in the executive summary on the Office of Federal Programs’ webpage.

2. Before the adoption of a Consolidated Plan, The City of Tuscaloosa shall advertise an Annual Program Year Community Planning and Development Summary that describes the anticipated funding amount (including grant funds and program income), range of activities that may be undertaken and the estimated level of funding for activities that will benefit low-to moderate income persons.
3. The City shall make every effort to minimize the displacement of persons and to assist any persons displaced by following the City of Tuscaloosa’s Displacement and Relocation Policy.

To this end, the City will also publish an Annual Displacement and Relocation Summary which will specify the types and levels of assistance available or will require sub recipients and/or contractors to make available to displaced persons, even if there is no expectation of displacement.

4. The information will be made available 15 consecutive calendar days prior to the 30 citizen comment period for the Consolidated Plan, Annual Action Plan, and AFH. It shall be available on the Office of Federal Programs webpage on the City of Tuscaloosa website, www.tuscaloosa.com. It will also be posted on Community News Bulletin located in the Office of Federal Programs, Tuscaloosa City Hall. For persons with disabilities or non-English speaking residents, the Office of Federal Programs will make reasonable and timely accommodations to ensure access to this information.

CONSOLIDATED PLAN AMENDMENTS AND AFH REVISIONS

Criteria for Substantial Amendments to the Consolidated Plan

The following criteria will be deemed to constitute a substantial change and will require an amendment to the Consolidated Plan and/or an Annual Action Plan:

1. Allocation priorities or the method of the distribution of funds are “significantly” different from those identified in the Consolidation Plan/Annual Action Plan. “Significantly” being defined as:
 - a. An increase or decrease of 21% or more of the total Grant Amount for a specific program year
 - b. Amounts 20% or less of the Grant Amount, only approval through City Council resolution is required
2. An activity not previously identified in an Annual Action Plan of the Consolidated Plan will be carried out
3. An activity described in an Annual Action plan will not be undertaken
4. The purpose, scope, location, or beneficiaries of an activity identified in an Annual Action Plan will be substantially changed

Criteria for AFH Revisions

The following criteria will be deemed to constitute a material change and will require a revision to the Assessment of Fair Housing (AFH):

1. A material change is defined as:

A material change is a change in circumstances in the jurisdiction of a program participant that affects the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances. Examples include:

- a. Presidentially declared disasters, under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 *et seq.*), in the program participant's area that are of such a nature as to significantly impact the steps a program participant may need to take to affirmatively further fair housing;
- b. Significant demographic changes;
- c. New significant contributing factors in the participant's jurisdiction;
- d. Civil rights findings, determinations, settlements (including Voluntary Compliance Agreements),
- e. Court orders;
- f. Upon HUD's written notification specifying a material change that requires the revision

A revision consists of preparing and submitting amended analyses, assessments, priorities, and goals that take into account the material change, including any new fair housing issues and contributing factors that may arise as a result of the material change. A revision may not necessarily require the submission of an entirely new AFH. The revision need only focus on the material change and appropriate adjustments to the analyses, assessments, priorities, or goals.

AVAILABILITY TO THE PUBLIC

Information to be Provided to the Public

1. Before adopting its Consolidated Plan, Annual Action Plan, AFH and CAPER, the City will publish a summary of the proposed plans and/or report in the Tuscaloosa News.

The advertisements will be made in the Tuscaloosa News, as an announcement on the OFP page of the City of Tuscaloosa website, and via postings throughout City Hall, and other public buildings throughout the community including but not limited to: the Tuscaloosa Public Library, The Weaver Bolden Branch of the Tuscaloosa Public Library, The Gateway: Alberta's Center for Technology, Tuscaloosa Parks and Recreation Building, Benjamin Barnes Branch YMCA and the Downtown Branch YMCA. The publications will include a description of the respective plans (subject) to permit informed comment.

2. Program documents that will be available for public inspection include the following: all grant agreements, records of hearings, letters of grant approval, prior year and current year applications, "Final Statements of Community Development Objectives and Projected Use of CDBG Funds," Annual Action Plans, the Consolidated Plan, the Citizen Participation Plan, project activity files, CAPERs, evaluation and monitoring letters from the U.S. Department of Housing and Urban Development, copies of program regulations and issuances, and documents regarding other program requirements, such as contracting procedures, fair housing and equal opportunity provisions, acquisition and relocation requirements and environmental policies.

The documents will be available for review at the Office of Federal Programs, 2nd floor of Tuscaloosa City Hall, 2201 University Boulevard, Tuscaloosa, AL 35401.

3. Upon request the City of Tuscaloosa will make available the Final Consolidated Plan, Final Annual Action Plan, Final AFH and CAPER as adopted, any substantial amendments, and any associated CAPER s in a form accessible to persons with disabilities.

Access to Records

The City of Tuscaloosa will provide all residents, public agencies, and other interested parties access to information and records related to the City of Tuscaloosa's AFH, Consolidated Plan, Annual Action Plan and CAPER and use of assistance under the programs covered under this Citizen Participation Plan during the preceding 5 years.

To access records, the interested party must complete and submit a formal public record request. The public document request must include: the name and contact information of the person making the request, the documents requested and the date of the request. The Office of Federal Programs has 5 calendar days to respond to the request for public document/record. Requests for Public Documents for Documents over 5 years old may be granted on a case-by case basis.

Requests for public documents shall be granted at no cost to the interested party. Information about the interested party shall not be shared with or sold to any third-party. Requests may be submitted in person, via phone, or in writing to the Office of Federal Programs.

TECHNICAL ASSISTANCE

The City of Tuscaloosa will provide technical assistance administered through the Office of Federal Programs to any groups and/or individuals representing persons of very low, low and moderate incomes. The technical assistance will be restricted to providing assistance in commenting on the Consolidated Plan, Annual Action Plan, and AFH and CAPER and in developing proposals for funding assistance under any of the Community Planning and Development programs. The level of technical assistance will be determined on a case by case basis, at the recommendation of appropriate Office of Federal Programs staff. Generally, technical assistance will consist of transcribing comments about Community Planning and Development plans, answering questions about program/project/activity eligibility, assistance in developing program/project/activity application and proposals.

Interested parties can request a Technical Assistance appointment via telephone, mail, email, or in-person. Contact Information for Technical Assistance: Telephone: (205) 248-5080 Email: mjones@tuscaloosa.com Mailing address: 2201 University Boulevard Tuscaloosa, AL 35401 Physical location: Tuscaloosa City Hall. 2nd Floor

No Technical Assistance will be given without a formal appointment.

Technical Assistance appointments are available Monday through Friday between 8am and 5pm CST.

The receipt of technical assistance is not a guarantee of acceptance of proposals or program/project/activity funding.

The City of Tuscaloosa will provide technical assistance to individuals and groups, especially persons of very low and low-income status, through the following methods:

1. The staff of the City's Office of Federal Programs will work with citizens who need assistance in articulating their ideas and in developing proposals for CDBG, HOME, HMIS, and ESG activities.
2. Copies of program regulations and other pertinent information will be provided to persons and groups at no cost.

CONFLICTS OF INTEREST/ETHICAL CONCERNS

The conflict of interest policies for the Citizen Participation Plan are as follows: No employee, officer, or agent of the City of Tuscaloosa may participate in the selection, award, or administration of a contract or proposal supported by Federal

funds if a real or apparent conflict is involved. Such a conflict would arise when any of the following parties has a financial or other interest in the firm selected for an award:

1. An employee, officer, or agent of the City of Tuscaloosa;
2. Any member of a City of Tuscaloosa employee's, officer's, or agent's immediate family;
3. A City of Tuscaloosa employee's, agent's, or officer's partner; or
4. An organization which employs or is about to employ any of the persons identified in in the preceding section.

No employees, agents, and officers of the City of Tuscaloosa can neither solicit nor accept gratuities, favors, or anything of value from contractors, or parties to sub-agreements.

No staff member or elected official shall make any promises for assistance or obligate the City in any way to financially supporting any proposal, program or activity prior approval from the City Council of Tuscaloosa and verification of program and project eligibility.

No staff member shall enter into a contractual obligation with prospective participants to receive monies or in kind compensation for the selection of his/her proposal and/or comments.

All allegations of unethical behavior are to be reported to the Director of Federal Programs and shall be investigated by an independent third party.

Any conflicts of interest, perceived or real, arising from a potential candidate for program/ project acceptance, or prospective contractor shall be disclosed immediately to the Director of Federal Programs.

GIFT POLICY

The Office of Federal Programs recognizes that some citizens express their gratitude for services rendered by providing gifts. The Office of Federal Programs does not encourage the practice. However, a gift may be accepted after meeting three requirements:

1. Gift cannot be a check, cash, credit card, money order or any other form of legal tender. City of Tuscaloosa employees, agents or officers are not to accept financial "gifts" of any value.
2. Gift must be unsolicited
3. Gift cannot be valued at more than \$20.00 USD

Procedure for Gift Approval

1. Office of Federal Program employee provides a written disclosure to the Director of Federal Programs. The disclosure shall include a description of the item, its approximate value and the name, address, and telephone number of the person making the gift.
2. The Director contacts the person making the gift to ascertain the circumstances prompting the gift.

3. The Director of Federal Programs provides written or verbal approval of the gift received.

Approvals of gifts are determined on a case by case basis and are at the complete discretion of the Director.

Procedure for Non-Compliant Gifts

1. Gifts valued at more than \$20.00 must be declined and returned to the giver.
2. In instances where the item is valued at more than \$20.00 and the item cannot be returned to original owner, the gift must be donated to a non-profit.

Members of OFP that violate the gift policy will be subject to disciplinary action, up to and including termination of employment.

COMPLAINTS/GRIEVANCE POLICY

Grievance Policy

The Office of Federal Programs affirms the City of Tuscaloosa's mission to foster a customer friendly environment. To further this mission, the Office of Federal Programs shall establish procedures to promote critical feedback and address the following citizen and participant concerns:

1. Concern about the planning and implementation of any parts of the Citizen Participation Plan (including performance and efficiency of staff, etc.)

Every person submitting a comment or proposal to City of Tuscaloosa in regard to the Consolidated Plan, the Annual Action Plan, AFH and/or CAPER must be informed of the grievance policy, complaint procedure and appeal procedure at the time of submission. A copy of the grievance policy must be provided upon request.

No staff person of the Office of Federal Programs or the City of Tuscaloosa can in any way prevent a citizen, prospective sub recipient or program participant from filing a grievance.

Examples of coercion/sabotage include: delaying a citizen with unrequired steps or documentation, intentionally misrepresenting information, not responding to attempts at communication, bullying, physical intimidation, etc.

Tampering includes but is not limited to destroying submitted documentation, editing documentation, etc. Any instances of sabotage, coercion or tampering must be reported to the Director of Federal Programs. Any instances of coercion, tampering, sabotage can result in disciplinary action, up to and including termination.

Complaint Guideline Procedures

The City encourages feedback on the implementation of the Citizen Participation Plan and its efforts to promote inclusion and public involvement for all Tuscaloosa residents.

To that end, citizens who wish to object to any phase of planning, development or approval of the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, AFH, CAPER or any revisions or amendments to the plans are encouraged to inform the City's Office of Federal Programs.

The City differentiates between comments and complaints. A comment may be in favor or against a proposed activity, recommendation, research methodology, and/or conclusions described in the Consolidated Plan, Annual Action Plan, AFH, or the CAPER. A complaint is defined as a negative thought or experience arising from the logistics of the planning and implementation of any of the Community Planning and Development programs.

A complaint can address the following areas:

1. Failure to implement the Citizen Participation Plan and the Consolidated Plan, Annual Action Plan, AFH, and CAPER as described in this document.
2. No reasonable accommodations for persons with disabilities
3. No reasonable accommodations for Non-English speaking persons
4. Failure to adequately inform public of prospective plans and reports for any of the Community Planning and Development programs.

Complaint Requirements

To file an official complaint, the citizen must adhere to following procedure:

1. The complaint must be written.
 - a. There must be a description of the OFP action and an adequate description of the circumstances that warrant the complaint
 - b. It should include the citizen's name, address, telephone number and email address, if available.
 - c. The complaint must be signed and dated
 - d. The complaint must be in a sealed envelope

The Office of Federal Programs is required to respond to every written complaint received. OFP has 15 business days from the date of receipt of the letter to respond, in writing, to the citizen or organization. Additionally, The Office of Federal Programs staff will inform the Mayor and Community Development Committee of any complaints in a monthly report.

USE OF CITIZEN PARTICIPATION PLAN

The City of Tuscaloosa must adhere to the policies and procedures outlined in this Citizen Participation Plan during the planning and implementation of any Community Planning and Development programs and projects funded in whole or in part by any U.S. Department of Housing and Urban Development grant or loan program including but not limited to: Community Development Block Grant, Home Investment Partnerships (HOME), Homeless Management Information Systems (HMIS), and Emergency Solutions Grant (ESG).

JURISDICTION RESPONSIBILITY

The requirements for the City of Tuscaloosa's Citizen Participation Plan does not restrict the City of Tuscaloosa's responsibility or authority of the jurisdiction for the development and execution of its Consolidated Plan, Annual Action Plan, AFH or CAPER.

HUD'S DEFINITION OF VERY-LOW, LOW, AND MODERATE INCOME

1. *Very Low Income*: Households whose incomes do not exceed 50 percent of the median area income for the area, as determined by HUD, with adjustments for smaller and larger families and for areas with unusually high or low incomes or where needed because of facility, college, or other training facility; prevailing levels of construction costs; or fair market rents.
2. *Low Income*: A household whose income does not exceed 80 percent of the median income for the area, as determined by HUD, with adjustments for smaller or larger families. HUD may establish income ceilings higher or lower than 80 percent of the median for the area median on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.
3. *Moderate Income*: Households whose incomes are between 81 percent and 95 percent of the median income for the area, as determined by HUD, with adjustments for smaller or larger families. HUD may establish income ceilings higher or lower than 95 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs, fair market rents, or unusually high or low family incomes