

CITY OF FORT LAUDERDALE

Housing & Community Development

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CITY OF FORT LAUDERDALE CITIZEN PARTICIPATION PLAN 2025-2029

Regarding the Use of Grant Funds from the U.S. Department of Housing and Urban Development

As required by the U.S. Department of Housing and Urban Development (HUD) regulations found at 24 CFR 91.105, this Citizen Participation Plan sets forth the City of Fort Lauderdale (City) policies and procedures for providing citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation, and evaluation of the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Housing Opportunities for Persons With AIDS (HOPWA) programs. The purpose of the CDBG program is the provision of decent housing, a suitable living environment, and expanded economic opportunities for low- and moderate-income residents earning less than 80 percent of the Area Median income, or in predominately low-and moderate-income neighborhoods where at least 51 percent of the households are low and moderate-income households. The purpose of the HOME program is to produce new and preserve existing affordable housing opportunities for low- and moderate-income households. The purpose of the HOPWA Program offers a variety of housing solutions and supportive services for low-income persons living with HIV/AIDS.

As a recipient of CDBG, HOME, and HOPWA funds, the City is required to produce the following Planning Documents:

- Citizen Participation Plan the City's policies and procedures for community participation in the planning, implementation, and evaluation of the CDBG, HOME, and HOPWA programs.
- Analysis of Impediments to Fair Housing Choice or Assessment of Fair Housing (AI or AFH) a five-year plan completed by the City individually or as part of a local consortium of other HUD grantees pursuant to HUD guidance for the evaluation of local housing conditions, economics, policies and practices and the extent to which these factors impact the range of housing choices and opportunities available to all residents in an environment free from discrimination.
- Consolidated Plan a five-year plan that documents the City's housing and community development needs, outlines strategies to address those needs and identifies proposed program accomplishments.
- Annual Action Plan an annual plan that describes specific CDBG, HOME, and HOPWA projects and activities that will be undertaken over the course of the program year, which runs from October 1 to September 30.

 Consolidated Annual Performance and Evaluation Report (CAPER) – an annual report that evaluates the City's accomplishments and use of CDBG funds which is Due to HUD by December 30.

The HUD requirements for citizen participation are intended to empower citizens and ensure their voices are heard in the planning and implementation of the Consolidated Plan through the CDBG, HOME, and HOPWA programs, but they do not diminish the authority or responsibility of the City to manage and execute these programs.

In accordance with the regulations, the minimum annual number of public hearings before the City Commission at which citizens may express their views concerning the Consolidated Plan Documents shall be two (2) public hearings. These public hearings shall occur at two different points during the development of the Five-Year Consolidated Plan and/or Annual Action Plan to obtain citizens' views and to respond to proposals and questions.

Additional public hearings and comment periods may be held in the development of the AI and the Consolidated Plan for 2025-2029 and in the event that substantial amendments to City of the Citizen Participation Plan, Consolidated Plan, or Action Plan become necessary as described later in this document. The City, at its discretion, may conduct additional outreach, public meetings or public hearings as necessary to foster citizen access and engagement.

The first public hearing will be held during the development of the Five-Year Consolidated Plan and/or Annual Action Plan before the proposed Plan is published for comment. The second public hearing will be held during the 30-day public comment period and prior to submission to HUD.

Encouraging Citizen Participation

The City encourages citizens to participate in the development of the Citizen Participation Plan, Consolidated Plan, AI or AFH, Action Plan, and CAPER. The City encourages participation by low-and moderate-income persons, particularly those living in slum and blighted areas (if any such areas are formally designated) and in areas where CDBG, HOME, or HOPWA funds are proposed to be used, and by residents of predominantly low-and moderate-income neighborhoods. Low- and moderate-income neighborhoods are defined as those in which 51 percent of the residents have incomes at or below 80 percent of area median income. The City shall also take appropriate actions to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

The City will ensure a concerted effort is made to notify and encourage the participation of citizens, local and regional institutions, the local Continuum of Care organization, and

public and private organizations including businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations, broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, emergency management agencies, state and local health service providers, social service providers, fair housing organizations, state and local governments, public housing agencies, affordable housing developers, and other stakeholders in the amendment of the Citizen Participation Plan or the development of the AI or AFH, Consolidated Plan, or Action Plans through mailings (including electronic mailings), online postings and public notices in the newspaper.

All communication regarding the Citizen Participation Plan and the Consolidated Plan documents should be directed to:

Citizen Participation Plan

City of Fort Lauderdale Housing and Community Development

914 Sistrunk Blvd. Suite 103 Fort Lauderdale, FL 33311 Ph: (954) 828-5391

The Citizen Participation Plan outlines the framework and methodologies for engaging the public in the decision-making processes regarding community projects and initiatives. It includes steps such as identifying stakeholders, conducting public meetings, gathering feedback through surveys and workshops, and ensuring transparency in communication. The plan emphasizes community participation by seeking input from a broad range of residents, outlining clear timelines for engagement opportunities, and establishing processes for continued public dialogue. It also defines the criteria for reviewing public comments and incorporating them into proposed actions, while ensuring compliance with applicable regulations and encouraging civic involvement.

1. Plan Development

The City's Citizen Participation Plan development procedures are outlined below:

a. Plan Considerations

As a part of the Citizen Participation Plan process, and prior to the adoption of the Consolidated Plan, the City shall make available the information required by HUD. This information shall be made available to citizens, public agencies, and other interested parties.

b. Plan Review and Comment

The draft Citizen Participation Plan will be available for public review for 30 days, ensuring accessibility for individuals with disabilities by offering various formats upon request, including oral, Braille, electronic, or large print versions for the visually impaired and delivering copies to homebound individuals. The Citizen Participation Plan shall encourage comment and participation by minorities and non-English speakers. Publication of the availability of the draft plan shall be in accordance with the City's adopted Limited English Proficiency Plan (LEP). Written comments shall be accepted by the Housing & Community Development Manager, or designee, during the public review period. A summary of all written comments and those received during the public hearing as well as the City's responses shall be attached to the Citizen Participation Plan prior to submission to HUD.

c. Public Hearing

The city will hold a public hearing or meeting to gather feedback on the proposed Citizen Participation Plan. The City Commission will then review the plan, potentially approving it as is, rejecting it, or approving it with changes based on the public's input.

d. Consolidated Plan Submission to HUD

The Citizen Participation Plan shall be approved as a stand-alone document. The Citizen Participation Plan will be submitted to HUD at least 45 days before the start of the program year as part of the Consolidated Plan or Annual Action Plan submission and will include the following:

- 1) A copy of the final Citizen Participation Plan;
- 2) Proof of the public notice;
- 3) A summary City of all comments received;
- 4) The City's responses to any comments received; and
- 5) Any explanation for any comments that are not accepted.

2. Consolidated Plan Amendments

The City shall use the following procedure to complete substantial or minor amendments to the Consolidated Plan, as necessary:

a. Amendment Considerations

The City shall substantially amend the Consolidated Plan if a "substantial change" is proposed by City staff or the City Commission. For the purpose of the Consolidated Plan, a "substantial change" is defined as:

- The City adds or deletes a Consolidated Plan Strategic Plan goal.
- To cancel an activity described in the Plan;
- To undertake an activity not described in the Plan; or

 To substantially change the purpose, scope, location or beneficiaries of an activity.

An activity triggers the "substantially change standard" if:

- a. The purpose of the activity addresses a different national objective than previously approved;
- b. The proposed funding of the project is increased or decreased by more than \$60,000 or 45% of the activity budget, whichever is greater; or
- c. The description of the activity (differs) from that which is recorded in the Plan; or
- d. The location of the project is changed to a different census tract; or
- e. The beneficiaries of the activity significantly changes.

The City may make minor changes to the Consolidated Plan, as needed, so long as the changes do not constitute a substantial amendment as described above. Changes to numeric accomplishment goals within an existing Strategic Plan goal shall not constitute a substantial amendment. Such minor changes to the Consolidated Plan do not require a public review and comment period or a public hearing.

b. Public Review and Comment

The City encourages residents and stakeholders to participate in the development of substantial amendments. Substantial Amendments to the Consolidated Plan shall be made available for public review for a 30-day period. Written comments shall be accepted by the City's Housing & Community Development Manager, or designee, during public review period.

A summary of the comments and the City's responses to the comments shall be incorporated into the Consolidated Plan Substantial Amendment. The City shall encourage participation from all residents, especially low- and moderate-income residents, minorities, non-English speakers and those with disabilities. Copies shall be made available in at the City's Housing & Community Development Department.

c. Public Hearing

The City will conduct public hearings to adhere to the regulations set forth by the HUD, ensuring transparency and community engagement. Notices will be published in designated local media outlets and on the City's official website at least 2 weeks prior to the hearing date to provide ample opportunity for public input. The hearing will be held in a venue accessible to all community members, and stakeholders are encouraged to attend to voice their opinions and feedback on the proposed amendment of the Plan.

d. Submittal to HUD

The City will submit to HUD several key documents, which include the final substantial amendment document, proof of public notice, a summary of all comments received, responses to the comments, and an explanation for any comments not accepted; additionally, as well as any minor amendments as needed at least 45 days before the program year pursuant to regulations, or as otherwise allowed or required by HUD.

3. Action Plan

The following describes the process and procedures related to the development of the Action Plan each year:

1. Plan Development

Each year, the City prepares an Action Plan listing the activities to be undertaken with HUD grant funds. The City shall implement the following procedures in the development and adoption of the Action Plan:

a. Plan Considerations

In addition to residents, the City will ensure that public (including City staff) and other agencies that provide the following services will be consulted in the development of the Action Plan:

- Housing Authority of Fort Lauderdale
- Broward County Continuum of Care
- Social Services for: Children, Elderly, Disabled, Homeless, and Persons with AIDS
- State and Local Health Agencies
- City's Urban Design & Planning Department

b. Plan Review and Comment

The draft Action Plan incorporating the City's proposed uses of CDBG, HOME, and HOPWA funds shall be made available for public review for a 30-day period. In a manner similar to that set forth for the Consolidated Plan, the City shall encourage participation from all residents, especially low- and moderate-income residents, minorities, non-English speakers and those with disabilities. The City shall make the plan accessible to all such groups. Copies shall be made available in at the City's Housing & Community Development Department.

Written comments shall be accepted by the City's Housing & Community Development Manager, or designee, during public review period. A summary of the comments and the City's responses to the comments shall be attached to the draft Action Plan.

c. Public Hearing

The City shall conduct a public hearing to accept public comments on the draft Action Plan. The City Commission shall approve, approve with modifications, or reject the Action Plan. The City will conduct public hearings to adhere to the regulations set forth by the HUD, ensuring transparency and community engagement. Notices will be published in designated local media outlets and on the City's official website at least 2 weeks prior to the hearing date to provide ample opportunity for public input. The hearing will be held in a venue accessible to all community members, and stakeholders are encouraged to attend to voice their opinions and feedback on the proposed amendment Action Plan.

d. Submittal to HUD

The City will submit the Action Plan to HUD with several key documents, to include the final substantial amendment document, proof of public notice, a summary of all comments received, responses to the comments, and an explanation for any comments not accepted; additionally, as well as any minor amendments as needed at least 45 days before the program year pursuant to regulations, or as otherwise allowed or required by HUD.

2. Action Plan Amendments

The City shall use the following procedure to complete substantial and minor amendments to the Action Plan, as needed:

a. Amendment Considerations

The City shall substantially amend the Action Plan if a "substantial change" is proposed by City staff or the City Commission. For the purpose of the Action Plan, a "substantial change" is defined as:

- Addition of a new project not previously identified in the Action Plan, without regard to funding source;
- Cancellation of an existing project identified in the Action Plan, without regard to funding source;
- A change in the purpose, scope, location or beneficiaries of a project; or
- An increase or decrease of more than 50% of the original project allocation, or an increase or decrease of more than \$25,000.

The City may make minor changes to the Action Plan, including any change not included in the definition of a "substantial change" above, as needed, so long as the changes do not constitute a substantial amendment as described above. Such minor changes to the Action Plan do not require a public review and comment period or a public hearing. However, City Commission approval of project funding changes may be required based on the amount.

b. Public Review and Comment

The City encourages citizen participation in the development of substantial amendments. Substantial Amendments to the Action Plan shall be made available for public review for a 30-day period. In a manner similar to that set forth for the Consolidated Plan, the City shall encourage participation from all residents, especially low- and moderate-income residents, minorities, non-English speakers and those with disabilities. The City shall make the plan accessible to all such groups. Copies shall be made available in at the City's Housing & Community Development Department.

c. Public Hearing

The City shall conduct a public hearing to accept public comments on the Action Plan Amendment. The City Commission shall approve, approve with modifications, or reject the Action Plan Amendment. The City will conduct public hearings to adhere to the regulations set forth by the HUD, ensuring transparency and community engagement. Notices will be published in designated local media outlets and on the City's official website at least 2 weeks prior to the hearing date to provide ample opportunity for public input. The hearing will be held in a venue accessible to all community members, and stakeholders are encouraged to attend to voice their opinions and feedback on the proposed amendment Action Plan.

d. Submittal to HUD

The City will submit the Action Plan Amendment to HUD with several key documents, to include the final substantial amendment document, proof of public notice, a summary of all comments received, responses to the comments, and an explanation for any comments not accepted. Minor amendments will be submitted to HUD at least once per year. Minor amendments may be aggregated into a single submission. Minor amendments shall be submitted prior to developing the Consolidated Annual Performance and Evaluation Report.

4. Consolidated Annual Performance and Evaluation Report (CAPER)

The City will implement the following procedures in the development of the Consolidated Annual Performance and Evaluation Report.

a. Report Development

The City will develop, approve, and submit a CAPER within 90 days of the conclusion of each grant year, or December 31. City staff will encompass prior year accomplishments for all CDBG, HOME, and HOPWA activities and will provide information on program expenditures and program beneficiaries as required by HUD.

b. Public Review and Comment

The draft CAPER will be made available for public review for a 15-day public comment period and written comments will be accepted during the public review period.

c. Public Hearing

The City will conduct one public hearing after the development of the CAPER to accept public comments on the draft CAPER. Notices will be published in designated local media outlets and on the City's official website at least 2 weeks prior to the hearing date to provide ample opportunity for public input. The hearing will be held in a venue accessible to all community members, and stakeholders are encouraged to attend to voice their opinions and feedback on the proposed Draft CAPER.

d. Submittal to HUD

The City will submit the CAPER to HUD with within in 90 days following the end of the program year. The City will submit the final CAPER, proof of public notice, a summary of all comments received, responses to the comments, and an explanation for any comments not accepted.

5. Analysis of Impediments or Assessment of Fair Housing (AI)

The Analysis of Impediments to Fair Housing Choice (AI) or Assessment of Fair Housing (AFH) is a five-year plan completed by the City individually or as part of the Consolidated Plan and pursuant to HUD guidance the City will evaluate local housing conditions, economics, policies and practices and the extent to which these factors impact the range of housing choices and opportunities available to all residents in an environment free from discrimination. The City will implement the following procedure in the preparation and adoption of the AI.

a. Public Participation

The City will actively reach out to a broad array of stakeholders—including citizens, local and regional institutions, and various organizations—using multiple communication channels like electronic and traditional mail, online postings, public notices, interviews, mail surveys, and consultation workshops to foster participation in the development of the AI.

b. Public Review & Comment

The draft AI will be made available for public review for a 30-day period. Written comments shall be accepted during public review period.

c. Public Hearing

The City will conduct one public hearing after the development of the AI to accept public comments on the draft AI. Notices will be published in designated local media outlets and on the City's official website at least 2 weeks prior to the hearing date to provide ample opportunity for public input. The hearing will be held in a venue accessible to all community members, and stakeholders are encouraged to attend to voice their opinions and feedback on the proposed Draft AI.

d. Adoption of Al

Upon adoption of an AI by City Commission, the City will retain the AI in its records and annually report on the status and disposition of the Fair Housing Plan recommendations. The goals of the AI will be incorporated into the Consolidated Plan prior to submission of the Consolidated Plan to HUD.

6. Public Hearing or Public Meeting, Notifications and Access

The policies and procedures for public hearings and notification regarding the development and substantial amendments to the Citizen Participation Plan, Five Year Consolidated Plan, Action Plan, Consolidated Annual Performance and Evaluation Report (CAPER), and Analysis of Impediments (AI) ensure that community members are informed and can actively participate in the decision-making process. This includes providing adequate notice of public hearings, ensuring accessibility to relevant documents, and allowing for public comments, thereby fostering transparency in the planning and evaluation of housing and community development initiatives.

1. Public Hearings/Meetings

a. Public Hearing Process

The City shall conduct a minimum of two (2) public hearings per year to obtain citizens' views and comments. These meetings shall be conducted at different times of the program year and together will cover the following topics:

- Housing and Community Development Needs
- Development of Proposed Activities
- Review of Program Performance

During a program year when the City develops an AI and Consolidated Plan, at least one public hearing shall be conducted prior to the draft AI and Consolidated Plan being published for comment.

b. Public Hearing Notification

City staff will ensure adequate advanced notice of all public meetings and hearings. Notices shall be printed/posted at least 14 days prior to the meeting date. Adequate noticing shall include:

- Publishing a public notice in a newspaper of general circulation; and
- Posting copies of notices on the City website.

Notices shall include information on the topic of the meeting, including summaries when appropriate, to properly inform the public. Notices shall be published in accordance with the LEP and shall be accessible to those with disabilities.

2. Documents for Public Review

Staff will provide timely announcements regarding public review and comment periods by printing and posting notices before the review begins. These notices will inform residents about the documents available for review, summarize the contents and purpose of each document, and list the locations where the complete draft documents can be accessed. The public comment period for each HUD required Plan is as listed below:

DOCUMENT	PUBLIC COMMENT PERIOD
Citizen Participation Plan	30 days
Consolidated Plan	30 days
Action Plan	30 days
CAPER	15 days
Al	30 days

The City shall ensure that documents are available for disabled, minority and non-English speaking residents.

Adequate noticing shall include:

- Publishing a public notice in a newspaper of general circulation; and
- Posting copies of notices on the City website.

The City shall place an adequate supply of draft copies of each document and substantial amendments to each document subject to public review at the following locations:

City of Fort Lauderdale City Hall 101 NE 3 Avenue, Fort Lauderdale, FL 33301

City of Fort Lauderdale Housing and Community Development 914 Sistrunk Blvd. Suite 103 Fort Lauderdale, FL 33311

Public Notices and draft documents shall also be posted to the City website at: https://www.fortlauderdale.gov/government/departments-a-h/development-services/housing-and-community-development

All printed reports and materials shall be made available in a form accessible to persons with disabilities, upon request.

3. Provisions For Limited-English Proficiency Residents:

a. Limited English Proficiency (LEP) Standards

The City will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and opportunity to participate in services, activities, programs and other benefits.

The City's LEP policy was established to ensure meaningful communication with persons that experience LEP and their authorized representatives. This policy also provides for communication of information contained in vital documents, including but not limited to, waivers of rights and consent forms.

All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served. Language assistance will be provided through use of competent bilingual staff, staff interpreters, contracts or formal arrangements with organizations providing interpretation or translation services, or technology and telephonic interpretation services.

b. Implementation Procedures for Limited English Proficiency Residents
The City will promptly identify the language and communication needs of the LEP population. If necessary, City staff may use a language identification card (or "I speak cards") or posters to determine the language. In addition, when records are kept of past interactions with individuals or their family members, the language used to communicate with the LEP person will be included as part of the record. The City will be responsible for:

- (a) Maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual contacts.
- (b) Contacting the appropriate bilingual staff member to interpret, if an interpreter is needed, if an employee who speaks the needed language is available and is qualified to interpret;
- (c) Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.

LEP persons can refer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and <u>after</u> the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the department or agency. Such an offer and the response will

be documented in the person's file. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person.

Children (e.g., persons under the age of 18) will **not** be used to interpret, to ensure confidentiality of information and accurate communication.

c. Providing Written Translations

When translation of vital documents is needed, the City will submit documents for translation into frequently encountered languages. Original documents being submitted for translation will be in final, approved form.

d. Monitoring Language Needs and Implementation

On an annual basis, the City will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, the City will annually assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, and feedback from the public and community organizations.

e. <u>Provisions for Limited-English Proficiency and Hearing-Impaired Residents</u> LEP or hearing-impaired residents can contact:

Matthew Cobb, AIC, AIS
ADA Coordinator
City of Fort Lauderdale Risk Management
401 SE 21st Street, Fort Lauderdale, FL 33316
E-mail: MCobb@fortlauderdale.gov

Phone: 954-828-6510; Fax: 954-828-5439; TTY: 954-828-5520 Florida Relay (Voice: 800-955-8770; Florida Relay (TTY: 800-955-8771

The ADA Coordinator can facilitate members of the public with the provision of auxiliary aids and services for City meetings, programs and events. Such requests should be made at least five (5 working days prior to the meeting date.

4. Language Access Plan

In compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166, the City, as a recipient of federal funds, is responsible for ensuring meaningful access by persons with Limited English Proficiency (LEP persons).

The City is obligated to reduce language barriers that can preclude meaningful access by LEP persons regarding the City's federal grant programs, which includes the Community Development Block Grant (CDBG) Program, HOME Investment Partnerships Act (HOME) Program, and Housing Opportunities for Persons with AIDS (HOPWA) Program.

This Language Access Plan (LAP) will define the actions to be undertaken by the City to ensure meaningful access to agency services, programs, and activities on the part of persons who have limited English proficiency.

This Language Access Plan represents the City's administrative role in providing meaningful access to services, programs and activities on the part of LEP individuals. This Language Access Plan outlines the tasks the City will undertake to meet this objective.

If the need for access services is identified either by phone, email, or in person, City staff will immediately take appropriate action to ensure meaningful communication through the methods described below:

- Contact interpreters and maintain a listing of identified staff members who are proficient in languages other than English and who are willing to assist in interpretation issues.
- Conduct regular translation of all public notices and planning documents.
- Utilize local community services such as law enforcement agencies, organizations, churches and /or schools that offer translators and interpreters.

The City will maintain notices on its website of the availability of translation and interpretation services. The City will also ensure all grant subrecipients are provided technical assistance regarding their responsibilities to provide Language Access Services in compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166.

5. Access to Consolidated Plan Documents and Records

Approved Consolidated Plan Documents and any approved amendments thereto, shall be kept on file in the Housing and Community Development Department located at 914 Sistrunk Blvd. Suite 103, Fort Lauderdale, FL 33311 and online at:

https://www.fortlauderdale.gov/government/departments-a-h/development-services/housing-and-community-development.

Reasonable efforts will be made to accommodate requests for documents in other languages in accordance with the City's LEP Plan. Reasonable efforts shall be made to accommodate requests for documents in an accessible format for those with disabilities. Such formats may include, but are not limited to providing oral, Braille, electronic or large print versions of the plan to those visually impaired and delivering copies to those who are homebound.

Requests for information and records shall be made to the City in writing. Staff shall respond to such requests within 15 working days or as soon as possible thereafter.

6. Technical Assistance

Technical assistance to applicants for CDBG, HOME, and HOPWA funds is available from the City's Housing and Community Development Department located at 914 Sistrunk Blvd. Suite 103, Fort Lauderdale, FL 33311 as follows:

- If published, any Notice of Funding Availability (NOFA) shall provide selfexplanatory application form(s) to facilitate access to CPD funds.
- Staff shall answer, in writing, all written questions and answer verbally all verbal inquiries received from citizens or representative groups pertaining to the NOFA and application(s).
- Staff shall conduct a project eligibility analysis to determine the eligibility of each project. In cases where only minor adjustments are needed to make proposals eligible or otherwise practical, staff shall advise the applicants on the options available and desired changes to the proposals.
- Staff shall arrange for translation on as-needed basis. To request technical assistance, contact the City's Housing and Community Development Department located at 914 Sistrunk Blvd. Suite 103, Fort Lauderdale, FL 33311 at Ph: (954) 828-5391.

7. Comments, Complaints or Appeals

Citizens or the City government, as well as agencies providing services to the community, are encouraged to state or submit their comments in the development of the Consolidated Plan Documents and any amendments to the Consolidated Plan.

Written and verbal comments received at public hearings or during the comment period, shall be considered and summarized, and included as an attachment to the City's final Consolidated Plan. Written comments should be addressed to: City's Housing and Community Development Manager at radwilliams@fortlauderdale.gov. Written responses to all comments will be addressed within 15 working days.

A complaint regarding the Consolidated Planning process and Consolidated Plan amendments must be submitted in writing to the City's Housing and Community Development Department. A written response shall be made to written complaints within 15 working days, acknowledging the complaint. Written complaints should be addressed to: Housing and Community Development Manager, or designee, Housing and Community Development Department at 914 Sistrunk Blvd. Suite 103, Fort Lauderdale, FL 33311. The City shall accept written complaints provided that the complaint specifies:

- The description of the objection, and supporting facts and data; and
- Provide name, address, telephone number, and the date of complaint.

Appeals concerning the Consolidated Plan Documents, statements, or recommendations of City Staff should be addressed to: Housing and Community Development Manager, or designee, Housing and Community Development Department at 914 Sistrunk Blvd. Suite 103, Fort Lauderdale, FL 33311.

8. Additional HUD Funding - CDBG-DR Allocations

The City of Fort Lauderdale will utilize its Citizen Participation Plan with the following amended requirements for its CDBG-DR program.

A. Overview and Purpose

The City of Fort Lauderdale has developed this Citizen Participation Plan (CPP) to guide public engagement in the planning and implementation of its Community Development Block Grant – Disaster Recovery (CDBG-DR) program. This CPP complies with the U.S. Department of Housing and Urban Development's (HUD) disaster recovery citizen participation requirements, including the Universal Notice (90 FR 1754, January 8, 2025, as amended March 19, 2025) and applicable allocation guidance. These requirements, which supersede certain standard citizen participation regulations (e.g., 24 CFR 91.105(b)-(d)), establish streamlined outreach procedures to expedite disaster recovery. Fort Lauderdale's CPP ensures that residents and stakeholders have meaningful opportunities to be involved in the City's use of \$88,051,000 in CDBG-DR funds appropriated for recovery from the April 2023 Severe Storms, Tornadoes, and Flooding (FEMA DR-4709).

Under HUD's alternative requirements, the City will hold a minimum of two public hearings on the draft CDBG-DR Action Plan and provide at least a 30-day public comment period on the plan. The City will follow this CPP to satisfy all applicable citizen participation requirements - as modified by HUD's waivers and alternative procedures. In addition, Fort Lauderdale commits to:

- Proactively notify the public of opportunities to participate, using a broad range of outreach methods (including but not limited to: website postings, email notices, press releases, social media, and public service announcements). The City will leverage existing outreach mechanisms such as the Neighbor Support Division and the communications framework from the Fast Forward Fort Lauderdale Vision Plan to maximize awareness and engagement.
- Reduce impediments to program access and ensure accessibility by providing accommodations for persons with disabilities and language assistance for residents with limited English proficiency (LEP), so that all affected residents can participate.
- Be transparent about the CDBG-DR program, by publishing key documents (e.g., Action Plan, amendments, policies, contracts, reports) on a public website and making program information readily available for public review.
- Document public input and the City's responses, and maintain records of all comments, complaints, and actions taken in response throughout the disaster recovery program.

The City's Department of Housing and Community Development (HCD), within the Development Services Department, will be responsible for implementing this CPP and ensuring compliance with its requirements for the duration of the CDBG-DR grant program. This CPP is a living document and may be amended as needed to improve or refine the City's citizen participation processes.

B. Adoption of the CDBG-DR CPP and Amendments

<u>Public Comment on the CDBG-DR CPP:</u> Fort Lauderdale will provide residents with a reasonable opportunity to comment on this initial Citizen Participation Plan and on any substantial amendments to it. The CPP (and any proposed CPP amendments) will be made available for public review, including in a format accessible to persons with disabilities upon request. Notice of the availability of the draft CPP or amendment will be posted on the City's disaster recovery website and in a newspaper of general circulation (in an accessible, non-legal section). The notice will describe the subject matter of the plan or amendment, where to review it, the length of the public comment period, and how to submit comments to the City. A public comment period of at least 15 days will be provided for the initial CPP and any CPP amendments. The City will consider any comments or feedback received and make revisions if appropriate before finalizing this plan.

Amendments to the CDBG-DR CPP: If the City needs to amend this Citizen Participation Plan (for example, to reflect updated HUD guidance or to improve procedures), the same process of public notice and comment will be followed. Minor or non-substantive updates - such as correcting typographical errors or updating contact information - may be made without formal public comment; however, any significant changes to CPP policies will be treated as a substantial amendment and subject to public review. All amended versions of the CPP will be posted on the City's disaster recovery website, and prior versions will be maintained on file for public reference.

C. Public Hearings and Meetings

Minimum Number and Timing: Fort Lauderdale will hold at least one (1) planning meeting and two (2) public hearings in relation to the CDBG-DR Action Plan. These hearings will occur at key stages, including after publication of the draft Action Plan during the public comment period, and as needed during program implementation (e.g., for any substantial CDBG-DR Action Plan amendments). The primary purpose of these hearings is to obtain citizen views and to respond to feedback and questions concerning the proposed use of CDBG-DR funds.

<u>Location and Accessibility:</u> Fort Lauderdale will hold meetings in locations that are accessible to the public and virtually. The City is committed to holding public meetings/hearings in venues convenient and accessible to the residents most affected by the April 12, 2023 flood. All meeting locations will be accessible for persons with physical disabilities, and meetings will be scheduled at times convenient for the public to encourage maximum attendance.

<u>Outreach and Notice for Hearings:</u> Fort Lauderdale will follow similar procedures for notification as from Section 6.1.b of this document. As well as make every effort to also circulate announcements through its Neighbor Support Division networks, which engage neighborhood associations citywide, and through community partners - such as United Way of Broward County and the Housing Authority of the City of Fort Lauderdale - to reach a wide audience.

The City will follow similar procedures for language access and engaging those with limited English proficiency as stated in Sections 6.3 and 6.4 of this document. Notices will

be published in English and available in Spanish, and Haitian Creole. Each notice will be issued with reasonable lead time (at least 14 days prior to the hearing) and will include the hearing date, time, location, subject matter, and instructions for requesting any special accommodation – such as translation or auxiliary aids.

Hearing Procedures: At the public hearings, City officials and/or CDBG-DR program staff will present information on the CDBG-DR Action Plan or amendments under consideration, including the amount of funds available, the range of eligible activities, and the proposed disaster recovery projects and programs. Following any presentation, members of the public will have the opportunity to ask questions and submit oral or written comments. Translation services and sign language interpretation will be provided at hearings as needed. The City will ensure that a sign-in or speaker registration process is in place so that all attendees wishing to speak have the chance to be heard. A City staff member and/or CDBG-DR program staff will record the proceedings and summarize all feedback received.

<u>Use of Virtual Hearings:</u> The City may utilize virtual public hearings (e.g., via an online webinar platform or teleconference) consistent with HUD guidance. The City will ensure the platform is accessible and that instructions for participation are clearly communicated in the public notice. At least one of the minimum two hearings will be conducted in person unless otherwise waived by HUD. This in-person meeting may be conducted during the Fort Lauderdale published Commissioners Meeting.

D. Public Comment Periods and Plan Publication

Fort Lauderdale will follow similar procedures for public comment periods and plan publication as stated in Section 6.2 of this document.

The City will provide a public comment period of no less than 30 calendar days for the initial CDBG-DR Action Plan. The start and end dates of the comment period will be stated in the public notices. During this time, the draft Action Plan will be made available online and in print for review. The City will accept comments in multiple formats: written comments may be emailed or mailed to the HCD Division, and oral comments will be accepted at the public hearings or via phone. All comments received through the various channels by the close of the comment period will be considered.

For any Substantial Amendment to the CDBG-DR Action Plan, the City will provide public notice and a 30-day public comment period prior to submitting the amendment to HUD.

E. Consultation with Stakeholders

Fort Lauderdale recognizes that effective disaster recovery requires collaboration with a broad range of community stakeholders and partner organizations. In developing and updating the CDBG-DR Action Plan and program policies as applicable, the City will consult with local and regional institutions and governments, the local Continuum of Care organization, public housing agencies, public and private organizations including businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations, and other stakeholders.

Consultation may involve a combination of methods: direct communication (email or letters) inviting feedback on the draft Action Plan; stakeholder workshops or focus group

meetings; surveys; one-on-one meetings or calls with key agencies; and review of existing plans or needs assessments.

F. Access to Information and Records

Transparency is a core component of Fort Lauderdale's CDBG-DR program. The City will ensure that citizens, public agencies, and other interested parties have reasonable and timely access to information and records relating to the Action Plan, program activities, and the use of CDBG-DR funds over the course of the recovery effort. Fort Lauderdale will follow similar procedures for information access as stated in Section 6.5 of this document.

The City will maintain a dedicated public Disaster Recovery website that serves as a central repository for CDBG-DR information. This site will be accessible through the City's main website and will be updated on a regular basis. The website will allow residents and stakeholders to easily see how CDBG-DR funds are being used and administered in Fort Lauderdale. The website will be maintained in an accessible format.

In compliance with HUD requirements, the following items will be posted on the disaster recovery website:

- The Action Plan and all Action Plan amendments (each amendment will be numbered sequentially, and the site will always have the latest consolidated version of the Action Plan available).
- Each Quarterly Performance Report (QPR) once HUD approves a QPR in the Disaster Recovery Grant Reporting (DRGR) system, the City will publish a version of the report (with any personal private information removed) on the website within 3 business days of HUD approval. These QPRs will detail expenditures and progress of funded activities.
- o This Citizen Participation Plan and any amendments to it.
- o The City's procurement policies and procedures applicable to CDBG-DR funds.
- All CDBG-DR program specific guidelines for each recovery program. This will include information on program eligibility, award calculations, and the projected timeline for expenditures and outcomes for each program. Program guidelines will be posted before the City begins accepting applications for that program, so the public can review how the programs work.
- Status of applications for assistance, by program (in a manner that protects individual privacy). For example, the City may provide information such as number of applications received, under review, approved, and funds disbursed, as part of each program's status reporting.
- All executed contracts directly funded by CDBG-DR, as defined at 2 CFR 200.22 (including contracts with subrecipients, vendors, etc., above the micro-purchase threshold). Along with contracts, a summary of current procurement opportunities or recently awarded bids (showing the nature of services or goods, and status) will be posted. (Note: Small contracts below the federal micro-purchase threshold are not required to be posted.)

 Performance reports and other major deliverables or plans (such as any substantial Action Plan amendment justification, environmental reports, or relocation assistance plans, if applicable).

G. CDBG-DR Action Plan Amendment

Over the course of the multi-year recovery program, it may become necessary to amend the CDBG-DR Action Plan to reflect changes such as new activities, budget adjustments, or revised strategies. Fort Lauderdale distinguishes between Substantial Amendments - which require public notice and HUD approval prior to implementation, and Non-Substantial Amendments - minor modifications that do not require formal public comment. The criteria for each are defined below:

<u>Substantial Amendment</u>: Fort Lauderdale will follow similar procedures for substantial amendment as stated in Section 3.2 of this document except and with the addition of the following:

- Adding or Deleting of CDBG-DR Action Plan Activities/Program: As the CDBG-DR
 Action Plan does not list individual projects but activities/programs to be
 performed, the addition or deletion of activity/program listed in the CDBG-DR Action
 Plan will trigger a substantial amendment. Examples of this include creating a new
 housing recovery program or canceling a planned economic development activity.
- Reduction in Overall Benefit to LMI: Any change that would result in a reduction of the Action Plan's commitment to meet the required overall benefit to low- and moderate-income (LMI) persons.
- Significant Budget Reallocation: Redistributing funds among approved activities such that the change in funding for any program or category is equal to or greater than 10% of the total CDBG-DR grant. In other words, if the City plans to transfer an amount that is 10% or more of \$88,051,000 from one use to another, that reallocation constitutes a substantial amendment. Smaller budget adjustments below this threshold may be handled as non-substantial amendments, provided they don't trigger any other substantial amendment criteria.
- Corrections/Updates to Key Programmatic Details: If, after HUD's initial review of
 the Action Plan, the City needs to update or complete information that was omitted
 or incomplete regarding major program design features such as the maximum
 award amounts for assistance, income limits, or other criteria that HUD required in
 the Action Plan, such an update is treated as a substantial amendment. This
 criterion essentially covers any significant clarifications required by HUD that
 change the scope of who or what can be assisted.

For any Substantial Amendment, Fort Lauderdale will follow the same procedures used for the original Action Plan: the amendment will be publicly noticed, a 30-day comment period will be held, and the City Commission will approve the amendment for submission to HUD. In accordance with HUD's waivers, the City is not required to hold an additional public hearing specifically for an Action Plan amendment - beyond the required hearings for the original Action Plan.

After the comment period, the City will summarize any comments received on the

amendment and include that in the submission to HUD. The Substantial Amendment will not be implemented until HUD approves it. Once approved, the City will publish the updated Action Plan on the website, indicating the amendment number and effective date.

Non-Substantial Amendments: An amendment that does not meet any of the criteria above for substantial changes will be considered a Non-Substantial (or minor) Amendment. These typically include adjustments like revising performance target metrics, tweaking program administration details, moving relatively small amounts of funds between budget categories (below the 10% threshold), or clarifying language in the plan. Non-substantial amendments do not require a public comment period or public hearing. They can be made at the discretion of the City's CDBG-DR Grants Administration team and submitted to HUD as they occur, or as part of a batch of minor updates.

<u>Additional Information</u>: The City will maintain an updated version of the Action Plan that incorporates all amendments to date, so that the public can always view the current plan in full context. The amendment history will also be version-controlled and documented within the plan.

It should be noted that urgent needs: If urgent unforeseen circumstances require an immediate change, the City will adhere to any expedited amendment process allowed by HUD (for example, HUD may waive the 30-day comment period in certain emergency scenarios). Otherwise, the above definitions will apply.

H. Complaints and Appeals

Fort Lauderdale will handle any citizen complaints or grievances regarding the CDBG-DR Action Plan, programs, or project activities in a timely and transparent manner. As required by HUD regulations (24 CFR 91.105(j)) and the applicable Federal Register notices, the City will provide a timely, substantive written response to every written complaint related to the disaster recovery program. Fort Lauderdale will follow similar procedures for complaints and appeals as stated in Section 7 of this document with the addition of the following:

- The City will log all complaints received and forward them as appropriate within the disaster recovery program management team for investigation/resolution.
- Complainants also have the right to submit grievances directly to HUD if they
 choose, especially if the issue involves alleged violations of HUD regulations or if
 they are not satisfied with the City's response. The HUD Field Office serving Fort
 Lauderdale is:

U.S. Department of Housing and Urban Development Miami Office of Community Planning and Development Brickell Plaza Federal Building 909 SE First Avenue, Room 500 Miami, FL 33131

Phone: 305-536-5678

Complaints sent to HUD should refer to the Fort Lauderdale CDBG-DR grant (FEMA DR-4709 allocation) and, if possible, carbon-copy (CC) the City so that all parties

are aware of the issue. HUD will generally refer complaints back to the City for initial resolution but will oversee that a response is provided.

- Recordkeeping: The City will maintain a log and files of all CDBG-DR related complaints and grievances. This will include the original complaint, supporting documentation, correspondence, and records of the steps taken to address the issue. These records of complaints received and how they were resolved will be made available for public review upon request, as part of the program's public records. Personal data identifying the complainant may be redacted consistently with statutory guidance. The City will also report to HUD, as required, the nature and status of any complaints. Patterns of complaints will be reviewed by program management to identify any systemic issues that need addressing.
- Referrals for Certain Complaints:
 - o If a complaint alleges a violation of fair housing or civil rights laws (for example, discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability in the CDBG-DR program), the City will forward the complaint immediately to HUD's Office of Fair Housing and Equal Opportunity (FHEO) for review. Complainants may also directly contact HUD FHEO; the City will provide the toll-free numbers (such as 1-800-669-9777, or the Region IV FHEO office at 1-800-440-8091) for anyone needing to file a fair housing grievance.
 - o If a complaint or evidence received suggests fraud, waste, or abuse of funds, the City will promptly notify HUD's Office of Inspector General (OIG). Reports of suspected fraud can be made directly to the HUD OIG Fraud Hotline at 1-800-347-3735 or hotline@hudoig.gov. The City will cooperate fully with any investigations and will have internal Fraud, Waste and Abuse policies in place which will be posted on the City's website as required.
 - o If a complaint concerns a decision by the City that is appealable (for example, a denial of program assistance), the complaint may be treated as an appeal under the specific program's guidelines. The City's program policies will outline appeal processes for applicants or beneficiaries who disagree with a determination (such as eligibility denial or benefit amount). Those appeal processes will align with this complaint procedure in terms of prompt response and documentation but may involve additional review by a program manager or independent body as described in the policies.

Fort Lauderdale values public feedback and views the complaint process as an opportunity to improve program management. Retaliation against any person who files a complaint or grievance is strictly prohibited. The City will make every effort to resolve issues at the lowest possible level and to the satisfaction of the complainant whenever feasible, while still complying with all applicable laws and regulations.

I. Performance Reporting and Ongoing Transparency

The City will keep the public informed of progress throughout the long-term recovery through performance reports and other updates including:

- Quarterly Performance Reports (QPRs): As noted in Section VII, the City will prepare and publish quarterly reports on the use of CDBG-DR funds. These QPRs, submitted to HUD via the Disaster Recovery Grant Reporting system, will detail expenditures by activity, beneficiary data (such as number of households assisted, demographic information), and narrative descriptions of accomplishments and challenges. Once HUD approves each QPR, the City will make it available on the website within 3 days. Citizens will be able to track how projects are progressing against the Action Plan goals quarter by quarter. The City encourages the public to review these reports and provide any feedback or questions.
- Performance Metrics: To make the information more accessible, the City may
 provide summary infographics or dashboards on the website. This could include
 metrics like percentage of funds spent, number of homes repaired, infrastructure
 projects completed, LMI benefit achieved, and so on. By doing so, residents can
 quickly grasp the scale and impact of the recovery activities.
- Amendment Tracking: As mentioned, all amendments will be clearly logged. If substantial amendments are made, the City will also summarize in a brief public notice or news release the nature of the changes and why they were necessary. This helps avoid confusion and keeps stakeholders aware of shifting priorities or new opportunities.

J. Technical Assistance

The City of Fort Lauderdale may provide technical assistance to groups or individuals to facilitate their participation in the CDBG-DR program, particularly to representatives of low-and moderate-income areas who may need help in developing proposals or understanding program requirements. For instance, if a community-based organization serving LMI residents requests help in interpreting the Action Plan or drafting a comment or proposal, the City can assign staff to assist or provide resources. This is in line with HUD's encouragement to involve all citizens in the process, including those who might not have extensive experience with government programs.

Additionally, if subrecipients or partner non-profits are involved in implementing programs, the City will provide training and technical guidance to ensure those partners also adhere to the CPP principles when engaging the public in their portion of the program.