

CITY OF PEABODY
NORTH SHORE HOME CONSORTIUM
CITIZEN PARTICIPATION PLAN PY2015-2020
Update & Revisions (COVID-19 Update)

Revised on June 8, 2020 to:

- Include virtual hearings as an allowed method for citizen participation when necessary for public health reasons;
- Provide a 5-day notice/comment period for proposed amendments necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.
- Make minor edits that do not change current citizen participation policies.
- Include provisions relative to the Community Development Block Grant (CDBG) and other applicable U.S. Department of Housing and Urban Development funding made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;
- Include provisions relative to the Consolidated Planning process and participation waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;

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 upon request to the greatest extent possible;

Please visit the Community Development Department webpage for future revisions to this plan: Citizen Participation Plan FY2015 – FY2020

CITY OF PEABODY NORTH SHORE HOME CONSORTIUM CITIZEN PARTICIPATION PLAN PY2015-2020

1. INTRODUCTION

This revised Citizen Participation Plan serves as the description of how the City of Peabody and North Shore HOME Consortium will involve citizens in the process of developing their respective 5-year Consolidated Plans and will also serve as a guide for involving citizens in developing future Annual Action Plans and future Consolidated Plans and revisions. These Citizen Participation Plans utilize a multi-prong approach to reach and include the community and stakeholders. Particular emphasis is placed on encouraging effective involvement by citizens, particularly those who reside in Public Housing Units and other low and moderate income neighborhoods (particularly those who may live in blighted areas), public officials (including state, municipal, and public housing officers), , the nonprofit sector, including community- and faith based- social service providers and advocacy organizations, as well as the interests of the private sector- including those involved in real estate development and philanthropic organizations. Due to the unprecedented Covid-19 Pandemic, and due to recent awards of funds from HUD to help combat the impact on the low income and our community, we have made some necessary revisions to this plan to include virtual outreach formats and expedited response periods in order facilitate to disbursement of funds to those impacted by this pandemic.

The City of Peabody and the North Shore HOME Consortium believe that the importance of citizen participation in programs goes far beyond simply meeting HUD's requirements. They encourage the involvement of people of color, people with disabilities, and people who do not speak English. It is clear that citizens themselves, along with the community groups serving the needs of these citizens, are the most familiar with the needs and assets of the communities and the strategies that will be most effective in making their neighborhoods a more enjoyable place to live and work. In addition, the quality of our programs and services is improved when the lines of communication are open between citizens and local government officials.

2. CITIZEN PARTICIPATION PROCEDURES

A. Notification of Public Meetings and Hearings *

The public will be given advance notice of the availability of all Consolidated Plan documents and of public meetings and hearings pertaining to the Consolidated Planning process. The public will be given at least 14 day advance notice of any meeting or hearing. Public notice will take the following form:

- An advertisement or notice will be placed in the major newspaper serving the region at least 14 days in advance of a public hearing or meeting.
- Advertisements or notices will be placed on the City of Peabody Website at least 14 days in advance of a public hearing or meeting.
- Advertisements or notices will be placed in all ethnic and minority newspapers that serve a Consortium community or communities.
- A press release will be sent to major press outlets serving the Consortium.
- The City and Consortium will maintain and update an e-mail list of interested citizens and organizations. Notices will be sent to those on the list as well as any individual and organization requesting to be included on the list.
- Included in the above list for notices will be all certified community development housing organizations, community action agencies, local and regional housing authorities, area agencies on aging, and those agencies serving persons with disabilities located in or serving the Consortium area.

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- * The CARES Act made available additional funding in Community Development Block Grant Coronavirus (CDBG-CV) funds. The CARES Act adds additional flexibility for both the CDBG-CV grant and, in some cases, for the annual HUD FY2020/City's FY2021 CDBG grants in these unprecedented times. The public comment period is reduced to not less than 5 days, grantees may use virtual public hearings when necessary for public health reasons, the public services cap is suspended during the emergency, and States and local governments may reimburse costs of eligible activities incurred for pandemic response regardless of the date. In addition, the CARES Act authorizes the Secretary to grant waivers and alternative requirements of statutes and regulations the Secretary administers in connection with the use of CDBG-CV funds and HUD fiscal year 2019 and 2020 CDBG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). Waivers and alternative requirements can be granted when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus. These edits do not change current citizen participation policies but have been modified to allow for necessary expedited actions during times of declared disaster or emergencies.

B. Location and Format of Public Meetings and Hearings *

The location of meetings and hearings is as important as the notification process. If the meetings are held in areas that are not easily accessible to low and moderate income

residents, then citizens will be less likely to participate. The following steps will be taken to ensure that meeting locations are suitable:

- For the City of Peabody, at least two (2) public meetings and hearings will be held, and for the Consortium, at least three (3) public meetings and hearings will be held to ensure coverage of all geographical regions of the Consortium. The regional location for public meetings and hearings must include at a minimum the Merrimack Valley, Cape Ann, and Southern Essex County.
- All meeting locations will be accessible to people with disabilities. If an individual requires special services, the City and the Consortium will make a good faith effort to make the necessary arrangements to accommodate that person, as long as reasonable advance notice is given.
- Every effort will be made to locate meetings in places that are accessible by public transportation.
- At least one public meeting and at least one public hearing will be held in the evening to ensure that low and moderate income working persons can participate.
- Local communities or non-profit and community groups may be asked to co-sponsor meetings and hearings so that citizens see the partnerships that exist between the Consortium, member communities, and nonprofit organizations.
- The City and the Consortium will make a good faith effort to coordinate with the community co-sponsor to provide childcare services during the meeting or hearing.
- With reasonable advanced notice, translators will be provided for citizens who do not speak English or who require sign-language translation.
- *For projects utilizing CDBG funding under HUD FY 2019-2020/City FY 2020-2021, and the CARES Act CDBG-CV funding, the City of Peabody and the North Shore HOME Consortium may conduct virtual hearings when necessary for public health reasons. If virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available upon request to the greatest extent possible.

C. Availability of Documents*

- * The City and the Consortium will make information pertaining to the Consolidated Plan process available to any citizen within five business days.
- * The summary of the Consolidated Plans, Action Plans, CAPER's, substantial amendments and related documents will be sent to non-profit and community groups that represent and advocate for low-income people. At a minimum, these community groups include certified community development housing organizations, housing authorities, community action agencies, area agencies on aging, and those agencies serving persons with disabilities located in or serving the City/Consortium area
- * The draft version of the Consortium's Consolidated Plan, Action Plans, CAPERs, substantial amendments and related documents will be sent to the

Community Development Departments of each member communities and will be available for the purpose of public inspection.

* The draft version of the Consolidated Plans, Action Plans, CAPERs, substantial amendments and related documents will be made available on the City of Peabody's Website.

* A written summary of all meetings and hearings relating to the Consolidated Planning process will be prepared and made available to citizens. The input provided at meetings and hearings will be summarized and reviewed and, as deemed appropriate, will be incorporated into the Consolidated Plan and Action Plans, including reasons why any suggestions were not incorporated.

Due to the Corona-19 pandemic, the City and Consortium may reserve the right to disseminate documents electronically when possible.

D. Citizen Participation Opportunities *

Stage 1: Development of the Citizen Participation Plan

- Every five years, the City of Peabody and the North Shore HOME Consortium will evaluate its Citizen Participation Plan and re-submit it with the Consolidated Plan.
- When deemed appropriate by the City and the Consortium, a steering committee comprised of government staff, non-profit staff and community leaders will facilitate the process of reviewing and recommending changes to the Citizen Participation Plan.
- The Draft Citizen Participation Plan will be available for general comments for at least 30 days.
- The updated Citizen Participation Plan will be published as part of the final Consolidated Plan.

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Stage 2: Needs Assessment

- Consolidated Plan - During the development of the Consolidated Plan, a community meeting will be held in at least two (2) low and moderate income neighborhoods to hear residents' opinions about the housing needs, strengths of the community and potential strategies. Community organizations will be invited to submit studies, survey results, and needs assessments to be used as data for the Consolidated Plan.
- Annual Action Plans - Each year at least two (2) community meetings will be held in different low and moderate income neighborhoods at least two (2) months before the draft Annual Action Plan is completed to assess how needs have changed and to evaluate program performance. Public elected officials from the local community will be invited to the community meetings.
- The City and the Consortium will encourage written suggestions from citizens. All written suggestions regarding the Consortium's Plans are to be sent to the Director of the North Shore HOME Consortium, and regarding the City of Peabody's Plans are to be sent to the Assistant Director of Community Development at Peabody City Hall, 24 Lowell Street, Peabody, MA 01960.

Stage 3: Draft of the Consolidated Plan and Annual Action Plan

Draft Document Availability:

- At least 31 days before a final Plan is approved, the City and the Consortium will notify citizens that a Draft of the Consolidated and/or Annual Action Plans are available. This notice will be e-mailed to all member communities and area non-profit agencies, published in area newspapers and on the web on the City of Peabody Website, and will give citizens a reasonable amount of time to review and comment on the Draft Plan.
- The Draft Plan will contain all sections required by HUD, including an estimate of how much funding the City and the Consortium expect to receive, priority tables, and an account of all proposed uses of expected funding (type of activity and amount of allocated funds).
- The Draft Plans and a summaries of the Draft Plans will be provided to the public within five (5) working days of request.
- Written suggestions will be encouraged from citizens. All written suggestions on the Consortium's Plans are to be sent to the Director of the North Shore HOME Consortium, and on the City of Peabody's Plans to the Assistant Director of Community Development, at Peabody City Hall, 24 Lowell Street, Peabody, MA 01960.

Public Hearings:

- At least two (2) public hearings will take place, and an effort will be made to use the same neighborhoods where the first need assessment meetings were held, to obtain public reaction to the Draft Plan. These hearings will take place at least 15 days before the final Consolidated Plan or Action Plan is submitted to HUD. The timing of the hearings will be conducted to allow the public enough time to read the Draft Plan before the public hearing and to give government officials enough time to carefully consider public verbal and written comments and incorporate them into the final Plan.

Stage 4: Final Consolidated Plan and Action Plan

- Copies of the Final Plan and a summary of it will be available to citizens within five (5) working days of the request.

*Stage 5: Amendments to the Consolidated Plan and Action Plan**

- The City and the Consortium are required to submit an amendment to HUD if: 1) There is a change in any of the priorities listed in the Priority Table; 2) There is a transfer of funds to an activity not referenced in the Final Plan; or 3) There is a change in the purpose, location, scope, or beneficiaries of an activity.
- Changes in funding levels for existing or already proposed activities are not considered substantial changes unless the increase or decrease in funding is 10% or more than the original funding level and it exceeds \$30,000.

Substantial amendments will be made public by publishing a public notice in area newspapers and on the City Website, will be e-mailed to member communities, and will undergo a 30-day comment period before the City/ Consortium holds a public hearing. The hearing will be held no less than 10 days before the amendment is submitted to HUD. The City/Consortium will consider carefully all comments, written and verbal, and make available a copy of the substantial amendment along with a summary of the suggestions and comments not accepted and an explanation for their rejection.

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Stage 6: The Consolidated Annual Performance and Evaluation Report (CAPER)

The CAPER must be submitted to HUD 90 days after the end of each program year. The CAPER must give a detailed description of how HOME funds were used in a given year and to what extent they benefited low and moderate-income households.

- The City and the Consortium will give a 30-day comment period for the CAPER.
- The City and the Consortium will hold at least one public hearing regarding the CAPER. A complete copy will be made available to citizens free of charge within five (5) working days of the request.
- The City and the Consortium will include all written public comments to the CAPER in the final draft submitted to HUD as well as a summary of all verbal comments made at the public hearing.

E. Written Complaints and Concerns

- All written complaints, concerns and suggestions should be sent to either the Assistant Director of Community Development (for Peabody related issues), or to the Director of the North Shore HOME Consortium (for regional issues), the Department of Community Development, Peabody City Hall, 24 Lowell Street, Peabody, MA 01960. Written complaints will receive a written response within 15 working days.
- Electronic responses may be sent to Stacey-Bernson@peabody-ma.gov or to Kevin-Hurley@peabody-ma.gov