

City of Chattanooga  
Department of Community Development  
Citizen Participation Plan  
FY 2005-2010

**SUMMARY**

The Citizen Participation Plan (CPP) is designed to meet the requirements of Section 104 of the 1974 Housing and Community Development Act, as amended and 24 CFR 91 to provide for citizen involvement in the consolidated planning and implementation of the City's Community Development Program. The program consists of activities funded in accordance with the Community Development Block Grant (CDBG), Emergency Shelter Grant (ESG), HOME Investment Partnerships Act (HOME), American Dream Downpayment Initiative (ADDI) programs of the U.S. Department of Housing and Urban Development.

The Plan:

- Encourages citizen participation, with particular emphasis on participation by citizens of low and moderate income who are residents of neighborhoods in which CDBG, ESG, HOME, and ADDI funds are proposed to be used;
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- Provides citizens with reasonable and timely access to meetings, information, and records relating to the grantee's proposed use of funds, and contents and purpose of the Consolidated Plan;
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- Provides for technical assistance to group's representative of citizens of low and moderate income that request such assistance in developing proposals;
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- Provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the Community Development Program, including at least the development of needs, review of proposed activities, and review of program performance standards; and,
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- Provides for timely response to written complaints and grievances.

The Citizens Participation Plan does not restrict the responsibility or the authority of City officials in the development of annual applications for funding from the U.S. Department of Housing and Urban Development or in the execution of the Community Development Program. The Mayor is the grantee recipient and the Department of Community Development serves as administrator of the programs.

## **STANDARD OF PARTICIPATION**

All phases of citizen participation will be conducted in an open environment and manner, with freedom of access to all interested citizens. Public hearings will be advertised and pertinent information will be available to the public. In addition, details of all programs will be available upon request at the following location:

Department of Community Development  
104 City Hall Annex  
100 East 11<sup>th</sup> Street  
Chattanooga, Tennessee 37402  
757-5133 (TDD 757-0011)

Monday through Friday, from 8:30 a.m. until 4:00 p.m. and on the City of Chattanooga's website at [www.chattanooga.gov](http://www.chattanooga.gov)

The Department of Community Development consults with and notifies other local units of government with regard to the Community Development Program as appropriate to ensure effective planning and implementation of community development activities.

To provide citizens the opportunity to participate in an advisory role in the program, this Citizens Participation Plan establishes a Community Development Advisory Committee.

## **COMMUNITY DEVELOPMENT ADVISORY COMMITTEE**

The role of the Community Development Advisory Committee (CDAC) is to provide citizen participation, especially by citizens of low and moderate income who live in areas where community development funds are to be used, in the planning and evaluation of the City's Community Development Program. The CDAC assists in the assessment of community needs, informs other citizen of the CDBG, ESG, HOME and ADDI programs and provides citizen input in the development of the City's Consolidated Plan Process.

The membership of the CDAC will be representatives of the City's nine (9) Council Districts, CDBG eligible neighborhoods, and agencies and departments whose interests and expertise relate to community development objectives.

There will be a total of thirty-one (31) members chosen in the following manner:

1. Council Representatives (9): One representative from each of the nine City Council Districts selected by the Council Member from that district. This individual must be a resident of the district from which he or she is chosen.
2. Neighborhood Representatives (9): The Mayor will select nine members from a list of the City's targeted neighborhoods in eligible census tracts. One resident of public housing will also be selected. The low to moderate income census tracts and the targeted neighborhoods are as follows:

Census Tract 1  
East Chattanooga\*\*\*

Census Tract 2  
Avondale \*\*\*

Census Tract 3  
Avondale\*\*\*

Census Tract 4  
Bushtown\*\*\*  
Churchville  
Lincoln Park  
Orchard Knob\*\*\*

Census Tract 8  
Hill City/Northside\*\*\*

Census Tract 11  
Ridgedale\*\*\*

Census Tract 12  
Glenwood\*\*\*

Census Tract 13 & 14  
Highland Park\*\*\*

Census Tract 15  
M. L. King

Census Tract 16  
Westside

Census Tract 18  
St. Elmo\*\*\*

Census Tract 19  
Alton Park\*\*\*  
Piney Woods\*\*\*

Census Tract 20  
South Chattanooga\*\*\*

Census Tract 23  
Piney Woods

Census Tract 24  
Cedar Hill\*\*\*  
Clifton Hills\*\*\*

Census Tract 25  
East Lake\*\*\*

Census Tract 26  
South Orchard Knob

Census Tract 32  
Eastdale (Greenwood Rd)\*\*\*

Census Tract 31  
Downtown

\*\*\*Strategic Neighborhood Initiative

3. Agency Representatives (12): The heads of the following organizations  
Serve on the Committee.

Chattanooga Department of Community Services  
Chattanooga Homeless Coalition  
Chattanooga Housing Authority (PHA)  
Chattanooga Human Services  
Chattanooga Neighborhood Enterprise, Inc.  
Chattanooga Mayor's Office  
Chattanooga Parks, Recreation, Arts and Culture  
Chattanooga Public Works Department  
Chattanooga Neighborhood Services Department  
Regional Planning Agency  
RiverCity Company  
The United Way

The City's Department of Community Development provides staff support to the CDAC and ensures compliance with the Citizen Participation Plan.

CDAC members, with the exception of agency representatives, may serve a maximum of two consecutive terms consisting of three years per term. A rotation system based upon appointment date to the CDAC ensures membership of new and experienced members whether appointed by the Mayor or Council Member.

The Mayor is encouraged to provide representation from as many different neighborhoods as possible.

The Committee elects a Chairperson from among the neighborhood and council representatives. A new Chairperson is elected annually.

The Chairperson names an Executive Committee of three members; the Chairperson, the immediate past Chairperson, and an Agency Representative to serve and make decisions on behalf of and at the discretion of the full CDCA during critical time constrained intervals.

Committee members are replaced on the CDCA; at the member's request, for absence from at least three consecutive meetings, and by member rotation.

When a new Council Member is elected, the previous Council Person's representative serves on the Committee until their term expires, and at that time, a new representative may be selected.

When a new Mayor is elected, the Mayor may only select the neighborhood representatives as the existing members terms expire which may include re-appointments or new appointees.

The Advisory Committee will meet no less than four (4) times each year. Additional meetings may be called if certain program changes occur and the Advisory Committee will meet to discuss and approve those changes. Committee members will be given at least ten (10) day's written notice of all meetings. Decisions will be made by majority vote of those in attendance.

### **ROLE AND RESPONSIBILITIES OF ADVISORY COMMITTEE**

The role of the Advisory Committee is to provide citizen participation in the Community Development Program. The Committee provides a meaningful avenue for residents of low to moderate-income neighborhoods to become involved in the program.

Specific responsibilities of the Committee are:

- Provides a means of citizen participation in the Community Development Program;
- Assists staff in assessing community needs which may be addressed with community development funds;
- Advises on possible uses of Community Development funds;

- Comments on the City's Consolidated Plan, amendments, and the Annual Performance Report, as appropriate;
- Advises on staff response to written comments about the program, as necessary;
- Assists staff in marketing Community Development Programs to the community; and,
- Reviews the performance and effectiveness of the Community Development Program.

### **PUBLIC HEARINGS**

In compliance with federal regulations and to encourage public participation in the program, the City will hold a minimum of two public hearings annually to obtain citizen views and respond to proposals and questions at all stages of the Community Development Program.

Meetings are scheduled at various intervals during the year to allow adequate time for citizen input to be effective. Additional public hearings are held during the year, as appropriate, to ensure adequate public comment on the program.

Public hearings are held in central locations, accessible to those with disabilities and convenient to public transportation. Locations in various neighborhoods are used as hearing sites to help stimulate interest, and conducted in the early evenings for the convenience of those working or unavailable during the day.

Accommodations are made for non-English speaking residents, deaf and hearing-impaired residents and visually impaired residents.

Meetings are advertised in local newspapers, neighborhood newsletters, and the City's web site, no less than ten (10) days in advance of the meetings.

### **CONSOLIDATED PLAN PROCESS**

The City will prepare a Consolidated Plan in accordance with 24 CFR 91. The regulations govern the consolidated submission for community planning and development programs. The regulations mandate a planning process that includes: an analysis of housing and community development needs; a five year strategic plan for meeting those needs; and, an annual action plan that outlines the use of funds; and an annual performance report.

The Consolidated Plan will take effect fiscal year 2005-2006, beginning July 1, 2005.

Consolidated Plan: The five-year plan builds on the results of community-wide needs assessments. Priorities are established with citizen input and will serve as a guide to the development of the Annual Action Plans.

The City will amend its consolidated plan prior to making any of the following decisions, which are considered substantial amendments:

1. To change the method of distributing funds or the priorities for allocation;
2. To carry out an activity, using funds from any program covered by the consolidated plan (including program income), not previously described, categorically, in the plan; or
3. To change the purpose, scope, location, or beneficiaries of priorities from what was proposed in the original plan.

The City will conduct at least one public hearing on the proposed substantial amendment. The hearing or meetings will be publicized and held as described in the above section "Public Hearings". The published notice will include a summary of the proposed changes and information on how to request a copy of the entire proposed amendment.

The City will receive comments from citizens and units of general local government on the proposed amendment for a period of not less than 30 days. The comment period will be publicized in the published notices and mailed to interested parties, upon request. Any comments received in writing will be considered in preparing the substantial amendment. The final substantial amendment will be submitted with a summary of these comments.

### **Annual Action Plan:**

Prior to submitting the Annual Action Plan outlining specific projects and the use of funds, the City follows the process described below:

- Staff and Advisory Committee reviews the results of local needs assessments and the Consolidated Plan;
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- Two or more public hearings are held to solicit input on community needs from the public-at-large;
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- The City provides the public information on the amount of funds to be received, range of activities that may be undertaken, the amount of benefit to low and moderate income, and plans to minimize displacement of citizens;
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- Solicit proposals for activities consistent with the Consolidated Plan;
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- Public hearings are held to receive comments on proposals;
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- Staff recommendations for funding are presented to the Mayor, Advisory Committee, and to the City Council for review and comment;
  
- The Annual Action Plan is developed and published community-wide for a thirty (30) day citizen review and comment period prior to submission to HUD; and,
  
- The City may modify the Action Plan after considering public comment, as appropriate.

A copy of the Action Plan is placed for public review at locations throughout the City. A newspaper notice informs the public of the location sites and availability of the Action Plan. The public is notified in the same manner of any Plan amendments and of Performance Reports developed on the program.

The public is given 30 days to comment on any amendments and Performance Reports, prior to the City's submission to HUD.

### **THE ANNUAL ACTION PLAN AMENDMENT**

The Annual Action Plan will be amended whenever the City:

1. Proposes to carry out an activity not described in the Annual Action Plan, the cost of which is in excess of 10% of the current year's estimated consolidated funding budget;
2. Proposes to not carry out an activity described in the Annual Action Plan;
3. Receives unanticipated program income in excess of 10% of the current year's estimated consolidated funding budget during the first half of the program year;

4. Receives substantially less program income than is anticipated as budgeted in the Action Plan and the shortfall results in the deletion or substantial change of an activity or;
5. Proposes to substantially change the purpose, location, scope or beneficiaries of an activity.

According to 24 CFR 91.105.3, the City is required to develop criteria for what it constitutes a substantial change in the purpose, scope, location, or beneficiaries of an Activity as it is described in the City's Action Plan.

The criteria for substantial change involve changes in projects or activities with budgeted amounts greater than \$250,000 and as follows:

1. Purpose: Any change in the overall purpose of an activity from one National Objective-Activity Category to another.
2. Scope: A change in the scope of the activity which would involve at least a 30% reduction in the expected outcome of the project.
3. Location: Any change of location of an activity for which the "area benefit" national objective is used, and which would change the area benefited, constitutes a substantive change. For any activity which is not "area wide", or which is not to benefit a limited clientele, a change in location would be considered substantive.
4. Beneficiaries of an Activity: A change in the composition of the original group of project beneficiaries would be a substantive change, i.e., a change in clientele from a service to abused children to homeless females.

Amendments that are not substantial are those that;

1. Result in the change of the vendor, governmental agency, organization, subrecipient, recipient, or contractor carrying out an activity identified in the Annual Action Plan; or,
2. Involve increases or decreases in amounts less than \$250,000 to approved projects or activities;
3. Involve the receipt of excess program income during the last half of a program year. When excess, unanticipated program income is received during the last half of the program year, the Action Plan may be amended at the time of receipt

or the excess program income may be identified and programmed in the Action Plan for the next program year.

### **CONFLICT OF INTEREST**

In accordance with HUD regulations 24 CFR 570.611, no person who exercises or have exercised any functions or responsibilities with respect to community development activities assisted under this part or who is in a position to participate in decision making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from a community development assisted activity, or have an interest in any contract, subcontract, or agreement with respect thereto,

or the proceeds there under, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

The conflict of interest provision of this section applies to any person who is an employee, agent, consultant, official, or elected official or appointed official of the recipient, or any designated public agencies, or subrecipients which are receiving funds under this part.

### **TECHNICAL ASSISTANCE**

The City's Office of Economic and Community Development provides technical assistance in developing proposals to organizations representing the interest of low and moderate income citizens and others interested in using community development funds. Workshops are offered during the solicitation for applications and technical assistance is provided on an individual basis, upon request. A statement of the availability of the technical assistance service and scheduled work sessions is included in solicitations for proposals.

### **WRITTEN COMPLAINTS**

The City's Office of Economic and Community Development responds to all complaints or grievances received in writing and related to the Community Development Program, the Consolidated Plan, amendments, or Performance Reports within 15 working days of the receipt of the complaint or grievance. The written response includes information and instructions on citizen's rights to contact the U.S. Department of Housing and Urban

Development, if the complaint is unresolved at the local level. A summary of comments or views not accepted and reasons thereof, are attached to the Consolidated Plan and Action Plan.

### **COMMENT ON CITIZEN PARTICIPATION PLAN**

A summary of the Citizen Participation Plan is published in the local newspaper at least 30 days prior to fiscal year 2005.

**The Plan takes effect when passed by majority vote of the Advisory Committee.**

Citizens may comment in writing to the Department of Community Development.