

**City of Florissant, MO**  
**Citizen Participation Plan**



**Pandemic & Emergency Response Amendment**

**2020**

# **City of Florissant**

## **Citizen Participation Plan - Pandemic & Emergency Response Ammendment**

**The City of Florissant's Citizen Participation Plan has been revised to:**

- Include virtual hearings as an allowed method for citizen participation;**
- Update the types of declared disasters or emergency events to include terrorism and infectious diseases, such as the recent coronavirus 19 (COVID-19) pandemic, that may necessitate expedited substantial amendments;**
- Provide details on possible actions, including reprogramming of funding and types of possible activities that may be undertaken in response to the COVID-19 pandemic;**
- Includes provisions relative to Consolidated Plan citizen participation, Community Development Block Grant, HOME Investment Partnership and Emergency Solutions Grant waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;**
- Make minor edits that do not change current citizen participation policies.**
- Use tools necessary to address ever changing needs, urgent needs and unmet needs of the low – moderate income community, so that the use of 25% of any annual entitlement grant equals a substantial amendment.**

**Please be advised that if virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.**

## **City of Florissant**

### **Citizen Participation Plan - Pandemic & Emergency Response Amendment**

**Goal:** As an entitlement Metropolitan City, our initial goal is to educate the community on the Community Development Block Grant (CDBG) program and to encourage citizen participation in the local consolidated planning process. Our long-term goal is to keep the public involved in our community and to provide opportunities to participate in the consolidated planning process on an annual basis.

#### **Input Strategy:**

The City of Florissant has had an active Citizens Participation Committee (CPC) for many years. The CPC is made up of Florissant residents who are appointed from their respective wards by the City Council. The CPC meets to review CDBG activities and to propose an annual CDBG budget to the City Council. The Citizen Participation Committee was developed as part of the City of Florissant's effort to include as many citizens as possible in the Community Development planning process. The citizen's primary function is to provide a broad based source of community input to the Mayor and City Council to assist in the determination of CDBG funding priorities and subsequent monitoring of CDBG funded activities.

#### **CITIZENS PARTICIPATION COMMITTEE (CPC)**

The Citizens Participation Committee (CPC) serves as the official citizen advisory body for all phases of the Community Development Block Grant (CDBG) application development, program implementation, monitoring and evaluation processes. The CPC is the major mechanism whereby the citizens of Florissant have an opportunity to express their needs as well as to be kept aware of the performance of the Community Development program.

#### **CPC TASKS**

- Evaluate and recommend priorities regarding community development needs.
- Evaluate existing CDBG programs.
- Evaluate and recommend programs for possible inclusion in future CDBG Consolidated Plan.
- Review the draft CDBG Consolidated Plan prior to its being made available for public comment.
- Recommend changes in the draft CDBG Consolidated Plan.
- Review the Citizen Participation Plan annually.
- Provide assistance and information to interested individuals and/or groups within Florissant.
- Conduct regular meetings on the second Thursday of each month, except June, July and August.
- Evaluate suggested uses of any CDBG funds earmarked for contingency activities. The CPC may recommend against such expenditures.
- Evaluate any amendments to approved CDBG projects, except those for urgent need activities.

Florissant will hold a CPC Commission meeting that will be open to the the public to get input on overall community planning and on the consolidated plan and subsequent annual plan for CDBG programs. A minimum of one weeks' notice will be given regarding the time and date of this meeting.

The City will hold at least two public forums per year to obtain citizens' views and to respond to proposals and questions. These forums will be conducted at two different stages of the program year. The hearings will address housing and community development needs, development of proposed activities, and review of program performance. The City will hold at least one public hearing for citizen input before the consolidated plan and subsequent annual plan is published for comment. A minimum of two weeks' notice will be given regarding the time and date of any public hearing.

**In times of pandemic and/or local, county, state and/or national public emergency, five days' notice will be given for all public hearings.**

The City of Florissant has always been proactive in its communications with residents and has many mechanisms for public input already in place. We publish and mail a quarterly newsletter directly to residents. We also produce our own cable television channel. Notices for these hearings will be posted at City Hall, the Government Center and at various community, public, and business bulletin boards throughout the City. Nonprofit organizations and other agencies will also be requested to provide input. The City utilizes local media to assist in the educating of residents on the CDBG program and encouraging participation. The City Council will also be encouraged to discuss the CDBG program whenever they attend a Ward or neighborhood meeting within targeted areas.

**In times of pandemic and/or local, county, state and/or national public emergency, some in-person postings may be limited, as those posting locations may be closed and unavailable to the general public.**

Technical assistance will be provided by City staff to any persons, including groups representative of persons of low- and moderate- income, that requests such assistance in developing proposals for funding.

**Public Hearings:** The City will provide a least two weeks' notice to citizens of any public hearing, with sufficient information published about the subject of the hearing to permit informed comment. Notices for public hearings will be posted on all available public, community, and business bulletin boards. A news release will also be submitted to local media.

Hearings will be held at times and locations convenient to potential and actual beneficiaries. Day and evening hours for hearings will be offered to allow for maximum public input. Appropriate actions will be taken to encourage the participation of all citizens including minorities and non-English speaking persons, as well as persons with disabilities. Locations for public hearings will be handicapped-accessible. Handicapped

citizens needing assistance or auxiliary aids will be advised to contact the City sufficiently in advance (no less than 24 hours) so that accommodations can be made.

In times of pandemic and/or local, county, state and/or national public emergency, five days' notice will be given for all public hearings, and the City will provide no less than five days for citizens, public agencies, and other interested parties to examine the plan and submit comments.

**Review of proposed activities:** Notice of the availability of the draft consolidated plan and/or subsequent annual plan will be published through public postings, cable TV channel announcements and promotion, website, and local media. The City submits press releases to local media to inform residents of the public hearings through local newspapers of general circulation. Copies are available at City facilities. A summary describes the contents of the plan and a list of the locations where copies of the entire proposed consolidated plan and subsequent annual plan may be examined. The City will provide a reasonable number of free copies of the plan to citizens and groups who request a copy in writing. Upon request, the draft consolidated plan and subsequent annual plan will be made available to persons with disabilities in a format that is readily accessible.

The City will provide at least 30 days for citizens, public agencies and other interested parties to examine the plan and submit comments. Written comments will be accepted and comments can be mailed directly to the City.

In times of pandemic and/or local, county, state and/or national public emergency, the City will provide no less than five days for citizens, public agencies, and other interested parties to examine the plan and submit comments. Written comments will be accepted and can be mailed directly to the City.

The City of Florissant will consider any comments or views of citizens received in writing in preparing the final consolidated plan and subsequent annual plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefor, shall be attached to the final consolidated and/or annual plan.

**Complaints:** Citizens who contact the City regarding a complaint will be directed to submit their complaint in writing. The City will provide a timely, substantive, written response to every written citizen complaint received within 15 working days, wherever practical. Any complaint should be submitted in writing to the following address:

City of Florissant  
Housing and Community Development Office  
1055 rue St. Francois  
Florissant, MO 63031

In times of pandemic and/or local, county, state and/or national public emergency, the City will provide no less than five days for citizens, public agencies, and other interested parties to examine the plan and submit comments.

**Amendments:** The City shall amend its approved plan whenever it makes one of the following decisions: (1) To make a change in its allocation priorities or a change in the method of distribution of funds; (2) To carry out an activity, using funds from any program covered by the consolidated plan and subsequent annual plan, including program income, not previously described in the action plan; (3) To change the purpose, scope, location, or beneficiaries of an activity.

A change of 25% or more in the use of the total entitlement of CDBG funds will be deemed a substantial amendment. Citizens will be provided reasonable notice and an opportunity to comment before the amendment is implemented. The comment period will be not less than 30 days. Notice of the substantial amendment will be posted on all available public, community, and business bulletin boards in the City for a minimum of 15 days.

In times of pandemic and/or local, county, state and/or national public emergency, five days' notice will be given for all public hearings, and the City will provide no less than five days for citizens, public agencies, and other interested parties to examine the plan and submit comments.

If an amendment calls for a change of 50% or more in the use of CDBG funds of the total entitlement, a public hearing will be held to provide for citizen input. Notices for these public hearings will be posted in all local newspapers, on our website, in our e-newsletter, and on our local cable television station.

The City of Florissant will consider any citizen comments or views received in writing in preparing the substantial amendment of the consolidated plan and subsequent annual plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefor, shall be attached to the substantial amendment of the consolidated plan and subsequent annual plan.

Upon completion of an amendment, the City will make the amendment public and will notify HUD that an amendment has been made. The City will submit a copy of each amendment to HUD.

**Performance Reports:** The City of Florissant shall annually review and report, in a form prescribed by HUD, on the progress it has made in carrying out its consolidated plan and subsequent annual plan. This performance report shall be submitted to HUD within 90 days after the close of the jurisdiction's program year. The reports shall include an evaluation of the City's progress in meeting its specific objective of providing affordable housing, including the number and types of families served. The report shall also include a description of the use of CDBG funds during the program year and an assessment of the relationship of that use to the priorities and specific objectives identified in the plan.

Citizens will be provided at least two weeks' notice of the draft performance report. At least 15 working days will be provided to receive comments on the performance report

that is to be submitted to HUD before its submission. Notices for this comment period will be posted on all available community, public, and business bulletin boards and a press release will be submitted to local media.

The City of O'Fallon will consider any citizen comments or views received in writing in preparing the performance report. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the performance report.

**Availability to public:** The consolidated plan and subsequent annual plan as adopted, substantial amendments, and the performance report will be available to the public, in a form accessible to persons with disabilities, upon request. Copies will be available in the Community Development office located in the Government Building.

**Disaster/Emergency events that may require expedited substantial amendments:**

It may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared disaster or emergency. There are three (3) types of disaster/emergency events that may necessitate an expedited substantial amendment including (1) Man-made disasters, (2) Natural disasters, and (3) Terrorism. Man-Made disasters can include, but are not limited to, chemical spills, mass rioting, power outages, dam failures, plant explosions, etc. Natural disasters can include, but are not limited to, earthquakes, hurricanes, tornadoes, wildfires, flooding, and public health issues such as wide-spread disease such as the recent coronavirus pandemic (COVID-19). Terrorism events can include, but are not limited to, bomb threats, biochemical attacks such as the spread of anthrax, cyber-attacks such as hacking, phishing, and virus distribution, etc.

These expedited substantial amendments may include funding new activities and/or reprogramming of funds including cancelling activities to meet needs resulting from such declared disaster or emergency. Therefore, the City of O'Fallon and its participating municipal units of local government may utilize CDBG or HOME funds to meet these needs with a 5-day public comment period instead of a 30-day public comment period, which is otherwise required for substantial amendments as provided for by HUD waiver in response to Consolidated Plan Requirements to prevent the spread of COVID-19 and mitigate economic impacts caused by COVID-19. For CDBG funding under Fiscal Year 2019, Fiscal Year 2020, and/or CDBG-CV and the Coronavirus Aid Relief and Economic Security (CARES) ACT, the City of O'Fallon, MO may provide five (5)-day notices for public comments regarding substantial amendments as allowed under HUD waiver.

With respect to a declared disaster, the City of O'Fallon and its participating municipal units of local government may elect to use CDBG, HOME or CDBG-CV funds to address needs not provided for the Federal Emergency Management Agency (FEMA) and the U.S. Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal, state, local and/or insurance sources unless allowed by the federal government. HUD may

provide new guidance on eligible uses in which the County will comply with and may utilize as well. All eligible CDBG activities, including those to address declared disasters or emergencies, must meet one of three national objectives which are (1) Benefit low- and moderate income (LMI) persons; (2) Aid in the prevention of slums or blight; and (3) Meet a need having a particular urgency (referred to as urgent need). The City of O'Fallon may carryout eligible CDBG activities to meet needs resulting from declared disasters or emergencies under these national objectives.