

City of Santa Clara, CA

Citizen Participation Plan

Federal funds provided by the
U.S. Department of Housing and Urban Development
Office of Community Planning and Development

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(This version supersedes prior versions of the Citizen Participation Plan)

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I. Introduction

Purpose and Background

The City of Santa Clara receives entitlement funding from two federal programs administered by the United States Department of Housing and Urban Development (HUD): Community Development Block Grant (CDBG) and Home Investment Partnerships Act (HOME). The purpose of these two programs is to benefit persons of low and moderate incomes by providing decent, affordable housing, public services, and community development. As an entitlement jurisdiction under both programs, the City is required to adopt a local Citizen Participation Plan to comply with provisions of 24 CFR Section 91.105.

As recipients of CDBG and HOME funds, the City of Santa Clara develops multiple plans and reports that are submitted to HUD to demonstrate compliance with federal requirements, which include:

- A Five-Year Consolidated Plan for Housing and Community Development (Con Plan)
- Annual Action Plans (AAPs)
- Consolidated Annual Performance and Evaluation Reports (CAPERs)
- Assessment of Fair Housing (AFH) ¹
- Amendments to the Citizen Participation Plan (CPP)
- Amendments to the Con Plan or AAPs

Citizen Participation Requirements

To guide the consultation and public participation process for the development of these plans and reports, federal regulations require grantees to develop and adopt a CPP that sets forth the jurisdiction's policies and procedures for citizen participation. Pursuant to the requirements outlined under [24 CFR Part 91.105](#), the City of Santa Clara sets forth the following CPP as it relates to the administration of federal funds provided by HUD.

The CPP must provide for, and encourage citizens to participate in, the development of the Con Plan, including the Annual Action Plans (AAP) that are part of the five-year ConPlan for the expenditure of federal funds, development of the Assessment of Fair Housing (AFH), any revisions of the AFH, any substantial amendments to the CP, and the Consolidated Annual Performance and Evaluation Report (CAPER), and updates to this CPP. The City is expected to take whatever actions are appropriate to encourage the participation of its citizens in the development of plans and amendments, particularly those living in a slum or blighted areas and areas where federal funds are proposed to be used, and including minority and non-English speaking persons and persons with disabilities.

¹ The Assessment of Fair Housing has previously been referred to as an "Analysis of Impediments," "Fair Housing Plan," and "Affirmatively Furthering Fair Housing Plan."

The federal Fair Housing Act (FHA) prohibits discrimination in the rental, sale, or financing of housing on the basis of race, color, national origin, religion, sex, family status, and/or disability. In 2015, the Obama administration reinvigorated and clarified fair housing obligations by requiring HUD grantees to conduct an Assessment of Fair Housing (AFH), which involves a planning process with community input. In response, the City worked with a regional collaborative and integrated AFH analysis into the City's newly adopted Housing Element Plan. The AFFH chapter in this plan identifies fair housing issues pertaining to patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to opportunity; and disproportionate housing needs, as well as the contributing factors for those issues and goals to promote a wider range of housing choices.

Contact

All communication regarding the reports covered by this CPP—including comments, complaints, and requests for reasonable accommodation for persons with disabilities, translation services, or other elements—shall be directed to:

**City of Santa Clara
Director of Community Development
Community Development Department
City of Santa Clara
1500 Warburton Avenue
Santa Clara, CA 95050**

Effective Date

After the City approves this amended CPP, it shall be effective until it is amended or otherwise replaced.

II. Encouragement of Citizen Participation

City Process

The City believes that the CPP process provides an important opportunity for its residents, especially low- and moderate-income residents, nonprofit groups, neighborhood organizations, and other service providers, to be actively involved in the preparation and implementation of the Con Plan. The city encourages the participation of local and regional institutions, the Continuum of Care, and other organizations such as businesses, developers, nonprofit organizations, philanthropic organizations, and community- or faith-based organizations in the process of developing and implementing the documents related to the Con Plan process.

The City will also encourage participation from broadband internet service providers, organizations engaged in narrowing the digital divide, agencies who manage flood-prone

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areas, public land, or water resources, and emergency management agencies in the development of the Con Plan.

The CPP actively encourages widespread citizen participation, with a special emphasis on good faith efforts to encourage participation from the following populations:

- Low- and moderate-income persons.
- Residents of slums, blighted areas, and predominately low- and moderate-income areas where 51 percent of the residents are at or below 80 percent of the area median income.
- Residents of areas designated as a revitalization area.
- Non-English-speaking persons.
- Persons with disabilities.
- Public housing residents and other low-income residents of targeted revitalization areas.

The CPP ensures that all parties, including residents, nonprofit organizations, and other interested organizations, are afforded adequate opportunity to review and comment on plans, programs, activities, and reports covering the city's federally funded housing and community development programs. This includes minority populations, people with limited English proficiency (LEP), and persons with disabilities.

A.) Public Notice

Adequate notice of all public hearings will be provided to residents through posting on the City's webpage, noticing in at least one newspaper of general circulation and direct notification to stakeholders. Adequate notice is defined as 15 calendar days. Public notices shall indicate the date, time, location, purpose of the public hearing, and information about the issues to be discussed.

The notice will detail locations where the entire draft plan(s) will be made available for review. Locations for public documents are included in Table 1 below.

Table 1: Public Document Review Location

Location	Facility
City of Santa Clara	Community Development Department Permit Center City of Santa Clara 1500 Warburton Avenue Santa Clara, CA 95050
	Central Park Library 2635 Homestead Road Santa Clara, CA 95050
	Northside Branch Library 695 Moreland Way Santa Clara, CA 95054

The City will consider any comments or views of residents of the community received in writing, or orally at the public hearings.

B.) Non-English Speakers

Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from federal agencies require federal aid recipients to take reasonable steps to ensure meaningful access to programs, services, and activities by those who do not speak English proficiently. To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the City's programs, services, or activities.
- The frequency with which LEP individuals come in contact with these programs, services, or activities.
- The nature and importance of the program, service, or activity to people's lives.
- The resources available to the City and the costs of the LEP services.

Upon request, the City will make translation and interpretation services available.

<https://www.santaclaraca.gov/our-city/departments-a-f/community-development/housing-community-services-division>

C.) Persons with Disabilities

The Director of Community Development, on behalf of the City of Santa Clara, will ensure the Americans with Disabilities Act (ADA) requirements are met in providing accessible, usable services and facilities for all persons with disabilities attending public meetings.

- People with impaired speech or hearing may call (408) 615-2490 through 711, the nationwide Telecommunications Relay Service. Sign language interpretation, translation into languages other

than English, and interpretation for persons with visual impairments are available.

- Sign language or other interpretation services must be scheduled at least one week in advance of public hearings by calling (408) 615-2490.

III. Citizen Comment Period

The comment periods for plans and reports are listed in the following table:

Table 2: Public Comment Period

Document	Comment Period
Con Plan & AAP	30 calendar days
Substantial Amendments to the Con Plan & AAP	30 calendar days
Assessment of Fair Housing (AFH/AI)	30 calendar days
Citizen Participation Plan (CPP)	30 calendar days
CAPER	15 calendar days

See [Section X. State of Emergency Amendment](#) for guidance in the event of a natural disaster or declared emergency.

IV. Plans and Reports

The following describes the City's key planning and reporting documents for the CDBG and HOME programs.

1) Consolidated Plan (Con Plan)

The Con Plan guides the use of federal CDBG and HOME funds for a five-year period. It describes the estimated amount of funding, priorities, and range of activities and projects that will benefit low- and moderate-income people.

Plan Development

The City will follow the process and procedures described below in the development of its Con Plan.

a. Stakeholder Consultation and Citizen Outreach

In the development of the Con Plan, the City will consult with other public and private agencies including, but not limited to, the following:

- Public housing authorities including the Santa Clara City Housing Authority (SCCHA).
- Assisted housing providers.
- Social service providers, including those focusing on services to minorities, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their

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families, homeless persons, and other protected classes.

- Community-based and regional organizations that represent protected class members and organizations that enforce fair housing laws.
- Regional government agencies that are involved in metropolitan-wide planning and transportation responsibilities.
- Broadband internet service providers and 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.

When preparing the portion of the Con Plan concerning lead-based paint hazards, the City shall consult with local or state health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead-poisoned.

When preparing the description of priority non-housing community development needs, the City will notify adjacent units of local government, to the extent practicable. This shall involve, at a minimum, the City sending a letter to the chief elected official of each adjacent unit of government notifying them of the draft Con Plan and how to access a copy online for review and comment.

The City may use a variety of engagement methods to solicit input from residents and stakeholders in the community such as virtual or in-person interviews, surveys, focus groups, or workshops.

b. Public Hearings

A Public Hearing is a meeting that is publicly noticed (e.g., City Council meeting) at least 15 days in advance, and the notice has a summary of what will be discussed. The City will conduct at least two Public Hearings on the development of the Con Plan. The first Public Hearing will be conducted during the drafting phase of the Con Plan, during which time, the public will have the opportunity to provide input on housing and community development needs, development of proposed activities, and the range of activities that may be undertaken. The Public Hearing will also detail the amount of assistance the City expects to receive (including grant funds and program income), and the number of low-and moderate income residents that will benefit.

The second Public Hearing will be conducted during the 30-day public comment period of the final version of the Con Plan. Typically, the final day of the 30-day public comment period is the day of the second Public Hearing. The intent having public comment end the same day of the second Public Hearing is so that there is no public comment that could be submitted after City Council has approved the final version of the Con Plan.

c. Public Display and Comment Period

As noted above, the draft Con Plan will be placed on display for a period of at least 30 days prior to the final hearing date to encourage public review and comment. The public notice shall include a brief summary and purpose of the Con Plan; the anticipated amounts of funding (including program income, if any); the dates of the public display and comment period; the locations where copies of the draft Con Plan can be examined; how comments will be accepted; when the document will be considered for action by the City, and proposed activities likely to result in displacement, if any; plans for minimizing the displacement of persons as a result of CDBG and HOME activities, if any; plans to assist persons actually displaced by the project, if any. Table 1 provides the locations where individuals can review copies of the draft Con Plan. In addition, the City will make available a reasonable number of free copies of the draft document to residents and groups that request them.

d. Comments Received on the Draft Consolidated Plan

Written comments will be accepted by the Director of Community Development, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at the public hearings, in preparing the final Con Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be included in the final Con Plan.

e. City Council Action

The final version of the Con Plan will be presented to City Council. This Public Hearing will be considered the second Public Hearing in the development of the Con Plan. Following this final Public Hearing on the Con Plan, the final version of the Con Plan will be submitted to HUD for acceptance no fewer than 45 days before the start of the City's 5-year Con Plan cycle, generally around the middle of May.

2) Annual Action Plan (AAP)

The AAP is a component of the Con Plan. It describes the City's proposed use of available federal funds and other resources to address the priority needs and specific objectives in the Con Plan for each program year during the 5-year Con Plan cycle. The program year begins July 1 and ends June 30.

Plan Development

The City will follow the process and procedures described below in the development of its AAP.

a. Public Hearings

A Public Hearing is a meeting that is publicly noticed (e.g., City Council meeting) at least 15 days in advance, and the notice has a summary of what will be discussed. The City will conduct at least two Public Hearings on the development of the Con Plan. The first Public

Hearing will be conducted during the drafting phase of the Con Plan, during which time, the public will have the opportunity to provide input on housing and community development needs, development of proposed activities, and the range of activities that may be undertaken. The Public Hearing will also detail the amount of assistance the City expects to receive (including grant funds and program income), and the number of low-and moderate income residents that will benefit.

The second Public Hearing will be conducted during the 30-day public comment period of the final version of the Con Plan. Typically, the final day of the 30-day public comment period is the day of the second Public Hearing. The intent having public comment end the same day of the second Public Hearing is so that there is no public comment that could be submitted after City Council has approved the final version of the Con Plan.

b. Public Display and Comment Period

The draft AAP will be placed on display for a period of at least 30 days to encourage public review and comment. The public notice shall include a brief summary and purpose of the AAP; the anticipated amounts of funding (including program income, if any); the dates of the public display and comment period; the locations where copies of the draft AAP can be examined; how comments will be accepted; when the document will be considered for action by the City, and proposed activities likely to result in displacement, if any; plans for minimizing the displacement of persons as a result of CDBG and HOME activities, if any; plans to assist persons actually displaced by the project, if any. Table 1 provides the locations where individuals can review copies of the draft AAP. In addition, the City will make available a reasonable number of free copies of the draft document to residents and groups that request them.

c. Comments Received on the Draft Annual Action Plan

Written comments will be accepted by the Director of Community Development, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at the public hearings, in preparing the final AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be included in the final AAP.

d. City Council Action

The final version of the AAP will be presented to City Council. This public hearing will be considered the second public hearing in the development of the AAP. Following this final public hearing on the AAP, the final version of the AAP will be submitted to HUD for acceptance no fewer than 45 days before the start of the City's fiscal year.

3) Amendments to the Consolidated Plan (CP) and Annual Action Plan (AAP)

Amendments to the Con Plan and AAP are divided into two categories: Substantial Amendments and Minor Amendments.

a. Substantial Amendments

A Substantial Amendment to the Con Plan or an AAP may be required to allow for new activities, modification of existing activities, or funding changes.

The criteria for what constitutes a substantial change that requires an amendment to the Con Plan or AAP are as follows:

- Adding a new activity not previously described in the Con Plan or AAP.
- Deleting an activity previously described in the Con Plan or AAP.
- Changing the purpose, scope, location, or beneficiaries of an activity previously described in the Con Plan or AAP.
- Changing allocation priorities or changing the method of the distribution of funds.

1. Amendment Process – Capital Improvement Projects

A Capital Improvement Project is defined as physical improvements to a public facility, facility owned by a nonprofit and open to the general public, or an affordable housing project.

- i. Funding changes from one category to a different category greater than \$250,000.**
A Substantial Amendment along with City Council approval via Public Hearing.
- ii. Funding changes within the same category that are greater than \$250,000.**
A Minor Amendment along with City Council approval via Consent.
- iii. Funding changes within the same category that are less than \$250,000.**
A Minor Amendment required; no City Council review required.
- iv. Funding changes from one category to a different category less than \$250,000.**
A Minor Amendment required; no City Council review required.

2. Amendment Process – Public Service Activities

A Public Service Activity is defined as a service that is provided to the public.

- i. Funding a new activity NOT previously approved in any plan.**
A Substantial Amendment along with City Council approval via Public Hearing.
- ii. Funding changes between previously approved Public Service Activities by the greater of \$20,000 or 50% change in the amount(s) originally allocated.**

A Minor Amendment along with City Council approval via Consent.

iii. Funding changes between previously approved activities less than \$20,000 or 50% change in the amount originally allocated.

A Minor Amendment required; no City Council review required.

Substantial Amendments are subject to the citizen participation process and require formal action by the City Council and submission to HUD by the end of the program year. The City announces substantial amendments to the public by publishing a public notice in one or more newspapers of general circulation for a period of 30 days to provide the opportunity for the public to review and comment on the proposed substantial amendments.

The notice will be available in English and may also be available in other languages, as feasible. The City will consider all written or oral comments or views received during the public comment period from the public concerning proposed substantial amendments in accordance with 24 CFR 91.105(c)(3). A summary of these comments and views, including comments or views not accepted and the reason why, shall be attached to the substantial amendment.

b. Minor Amendments

Minor amendments (also known as “administrative transfers”) represent any action or changes that do not surpass the Substantial Amendment thresholds. These require the signature of the City’s Community Development Department or designated representative but do not require public notice or City Council approval.

4) Consolidated Annual Performance and Evaluation Report (CAPER)

The City is required by HUD regulations to report annually on its performance in implementing the activities of the Con Plan and Annual Action Plan. This takes place via the CAPER. The CAPER must be submitted to HUD no later than 90 days from the end of a program year.

To allow the public to comment on the CAPER, the City will publish a notice in one or more newspapers of general circulation stating that its draft CAPER is available for review. The notice will be available in English and may also be available in other languages, as feasible. The notice will detail locations where the entire draft CAPER will be made available for review.

Report Development

The City shall adhere to the following procedure in the drafting and adoption of its CAPER.

a. Report Considerations

The City will evaluate and report the accomplishments and expenditures of the previous program year for CDBG and HOME and draft the CAPER in accordance with

HUD requirements.

b. Public Display and Comment Period

The draft CAPER will be published/noticed no less than 15 days prior to the start of the Public Comment Period. The Public Comment Period will be not less than 15 days prior to the Public Hearing where City staff will present the CAPER. The public notice shall include a brief summary and purpose of the CAPER, a summary of program expenditures, a summary of program performance, the dates of the public display and comment period, the locations where copies of the draft CAPER can be examined, how comments will be accepted, and the anticipated submission date to HUD. Copies of the draft CAPER will be made available for review at the locations noted in Table 1. Accommodation for persons with disabilities and non-English Spanish speakers in accordance with this CPP will be given upon request.

c. Comments Received on the Draft CAPER

Written comments will be accepted by the Director of Community Development, or a designee, during the 15-day public display and comment period. The City will consider any comments or views of City residents received in writing in preparing the final CAPER. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be included in the final CAPER.

d. City Council

The CAPER will be presented to City Council. Following this public hearing on the CAPER, the report will be submitted to HUD for acceptance on or prior to September 28th.

Plan Access

See Table 1 for locations of copies of the draft CAPER for review.

5) Assessment of Fair Housing (AFH)

In coordination with the Con Plan process and the City's Housing Element Plan, the City prepares reports on annual progress toward identified fair housing goals and actions in the CAPER.

Regulatory Requirements

In February 2023, HUD published a Notice of Proposed Rulemaking called "[Affirmatively Furthering Fair Housing](#)" in the Federal Register that outlines proposed fair housing planning requirements for communities to comply with Title VIII of the Civil Rights Act of 1968 (commonly known as the Fair Housing Act) to affirmatively further fair housing. During the proposed rulemaking period, the [Affirmatively Furthering Fair Housing Interim Final Rule](#) remains in effect. In 2018, the State of California adopted AB 686 which required jurisdictions to proactively promote inclusive communities, further housing choice, and address racial and ethnic disparities through programs in the Housing Element plan. The City of Santa Clara has incorporated AFH analysis, goals, and actions into its local Housing Element plan which is a chapter in the General Plan.

City Process

The City continues to commit to and certify compliance with federal affirmatively furthering fair housing requirements by implementing AFFH policies through its Housing Element plan. Like and AFH, the Housing Element includes analysis of the local fair housing landscape that describes the public and private policies and practices that may limit fair housing choice and access to opportunities in the jurisdiction. The Housing Element identifies fair housing issues and outlines City goals and describes the actions the City can take to address the identified fair housing issues. The City reports progress on the Housing Element and CAPER annually.

Plan Development

The AFH analysis will typically contain the following sections:

- A summary of the citizen and stakeholder engagement conducted by the City to gather input from the community on the fair housing issues impacting the City.
- An analysis of the demographic composition of persons residing in the City.
- An assessment of the fair housing issues that restrict fair housing choice or access to opportunities.
- An assessment of the contributing factors that create, contribute to, perpetuate, or exacerbate one or more of the identified fair housing issues.
- An identification of the City's fair housing goals and actions to address the identified fair housing issues.

In the development of the AFH analysis, the City may use a variety of engagement methods to solicit input from residents and stakeholders in the community such as virtual or in-person interviews, surveys, focus groups, or workshops. Engagement with

stakeholders includes but is not limited to the following types of organizations serving the community:

- Public housing authorities serving the City.
- Providers of assisted housing.
- Social service providers, including those focusing on services to minorities, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes.
- Community-based and regional organizations that represent members of protected classes as well as organizations that enforce fair housing laws.
- Public agencies involved in local planning, zoning, and transportation responsibilities.

Revisions to the AFH

In the event that the AFH and/or Housing Element that has been reviewed by HUD and must be revised, the City will update and resubmit the plan to HUD for review when one or more of the following occurs:

- Circumstances such as a natural disaster, significant demographic change, new contributing factors impacting fair housing choice, and/or civil rights findings prompt the Consortium to update the analysis, contributing factors, goals, and/or actions included in the fair housing plan.
- The City receives a written notification from HUD specifying a material change in the AFH.

a. Public Hearing

The City will hold at least one public hearing to obtain the views of residents on AFH-related data and affirmatively furthering fair housing in the City's housing and community development programs. The City will hold this public hearing before the draft AFH analysis is published for comment.

b. Draft AFH

Before the City submits the AFH to HUD for review, the City will make a draft version of the AFH available to citizens, public agencies, and other interested parties for review and will establish the means to submit comments or questions on the plan. The City will publish the draft version of the AFH for a period of at least 30 days to provide residents with sufficient opportunity to review and comment on the document. A summary describing the contents and purpose of the fair housing plan will be published in one or more newspapers of general circulation.

6) Citizen Participation Plan

The CPP (this subject document) is required by HUD regulations and outlines the means and methods that the City uses to encourage public input into the planning and review process for the City's CDBG and HOME programs.

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Pursuant to 24 CFR Part 91.105, the City has developed and adopted the CPP and is committed to its implementation. The procedures outlined herein are designed to encourage all residents to participate in process and program development.

When changes to the CPP are necessary, the City will publish a notice in one or more newspapers of general circulation that the amended CPP is available to review so that the public will have sufficient opportunity to review and comment on the updates. There will be a 30-day public comment period prior to the adoption of the amended CPP.

Upon request, the CPP can be made available in a format accessible to persons with disabilities.

V. Access to Records

Records relevant to the Con Plan process and program administration are available for the preceding six years. Citizens, public and private agencies, and other interested parties will be given reasonable and timely access to information and records related to the Con Plan and program activities.

VI. Anti-Displacement and Relocation Policy

Applicants are encouraged to propose projects that avoid or minimize displacement. Projects that include federal funding (CDBG) intended for the acquisition, demolition, or rehabilitation of a building that has residential or commercial tenants in place must follow the federal relocation requirements of the Uniform Relocation Act, as described in 49 CFR Part 24, and the Real Property Acquisitions Regulations for Federal and Federally Assisted Programs, as well as the Barney Frank Amendment, Section 104(d), if applicable.

The City's Con Plan activities are designed to eliminate or minimize the displacement of residents. Program guidelines and limitations are structured so that permanent displacement is unlikely. Should displacement occur, displaced persons may be offered one or more of the following depending on the project's funding source:

- A rent subsidy for another unit.
- A cash payment to be used for rent or a down payment on the purchase of a dwelling unit.
- Moving and related expenses.

VII. Technical Assistance

Technical assistance will be made available by the City to groups representing low- and moderate-income persons who request assistance in commenting on the fair housing plan or in understanding the requirements for developing proposals and preparing applications under the Con Plan and the AAP.

VIII. Complaint Review Process

The City will provide a written response to every complaint submitted in writing within 15 working days, if feasible. A complaint pertaining to the CDBG or HOME programs, CP, AAP, any plan amendments, and/or the performance report may be submitted for response to the department staff. Staff will review the complaint and respond within 15 working days of receipt. A written appeal of a response may be requested of the director who will review the appeal and provide a written response within 15 days. The contact information is shown below.

**City of Santa Clara
Director of Community Development
Community Development Department
City of Santa Clara
1500 Warburton Avenue
Santa Clara, CA 95050**

Citizens may, at any time during the complaint resolution process, contact HUD at the San Francisco Field Office using the following address:

**U.S. Department of Housing & Urban Development
Office of Community Planning and Development-9AD
One Sansome Street, Suite 1200
San Francisco, CA 94104**

IX. State of Emergency Amendment

During declared states of emergency, national pandemics, disaster events, and public health issues such as the coronavirus, it may be necessary to expedite substantial amendments to the CPP.

These expedited substantial amendments may include funding new activities and/or reprogramming funds to meet community needs resulting from the state of emergency or disaster event. As a result, the City may utilize CDBG and HOME or other HUD resources to meet these needs with a five-day public comment period instead of a 30-day public comment period, which is otherwise required for substantial amendments. It is anticipated that HUD would provide guidance in the event of a declared state of emergency.

Additionally, during a state of emergency or disaster event, in-person public hearings will not be required and virtual hearings will be acceptable. Please be advised that if virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or LEP persons will be made available to the greatest extent possible. During states of emergency or disaster events, advertisements and public notices may be made available solely on the City website.

Virtual Public Hearings

Virtual public hearings are allowed under the following circumstances:

- National/local health authorities recommend social distancing and limiting public gatherings for public health reasons.
- Virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

X. Acronyms

Acronym	Definition
AAP	Annual Action Plan
ADA	Americans with Disabilities Act
CAPER	Consolidated Annual Performance and Evaluation Report
CDBG	Community Development Block Grant
Con Plan	Consolidated Plan for Housing and Community Development
CPP	Citizen Participation Plan
HOME	HOME Investment Partnerships Program
HUD	U.S. Department of Housing and Urban Development
LEP	Limited English Proficiency