

CITIZEN PARTICIPATION PLAN

RELATING TO THE ADMINISTRATION OF THE COMMUNITY PLANNING & DEVELOPMENT PROGRAMS OF THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

> Formally Amended June 30, 2020 Updated by HAND May 2023

CITY OF BLOOMINGTON AMENDED CITIZEN PARTICIPATION PLAN RELATING TO THE ADMINISTRATION OF THE COMMUNITY PLANNING & DEVELOPMENT PROGRAMS OF THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

Table of Contents

Α.	Introduction Purpose Lead Agency Effective Date	4
В.	Encouragement of Citizen Participation General Non-English Speakers Persons with Disabilities Low- and Moderate-Income Persons Organizations and Agencies Local Public Housing Authority Public Notices Public Hearings Technical Assistance Online Access Other Engagement Techniques HAND Director	6
с.	The Citizen Participation PlanAmendments to the Approved Citizen Participation PlanAmendment ConsiderationsDraft Amended Plan ReviewComments Received on Draft Amended PlanPublic HearingRedevelopment Commission ActionSubmission to HUDPlan Access	9
D.	The Consolidated PlanPlan DevelopmentStakeholder Consultation and Citizen OutreachPublic HearingsPotential Displacement of PersonsRedevelopment Commission ActionCity Council ActionPublic Display and Comment PeriodComments Received on the Draft Consolidated PlanSubmission to HUDRevisions to the Consolidated PlanRevision ConsiderationsPublic Display and Comment PeriodComments Received on the Draft Revised Consolidated Plan	10

Submission to HUD In the Event of a Disaster Plan Access

The Annual Action Plan

Ε.

н.
G.
F.

14

3

CITY OF BLOOMINGTON AMENDED CITIZEN PARTICIPATION PLAN RELATING TO THE ADMINISTRATION OF THE COMMUNITY PLANNING & DEVELOPMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

A. Introduction

<u>Purpose</u>

Pursuant to the citizen participation requirements of 24 CFR Section 91.105 and 24 CFR Part 5, the City of Bloomington (referred to as the "City") sets forth the following amended Citizen Participation Plan (the "Plan") as it relates to the administration of the Community Planning and Development (CPD) programs funded by the U.S. Department of Housing and Urban Development (HUD). The Plan presents the City's plan for providing for and encouraging all citizens to participate in the development, revision, amendment, adoption, and implementation of the:

- 1) Citizen Participation Plan
- 2) Consolidated Plan (CP)
- 3) Annual Action Plan (AAP)
- 4) Consolidated Annual Performance and Evaluation Report (CAPER), and
- 5) Section 108 Loan Guarantee Program

Lead Agency

The Department of Housing and Neighborhood Department (HAND) is the lead agency responsible for the administration of the Community Development Block Grant Program (CDBG) and HOME Investment Partnerships Program.

The Bloomington Redevelopment Commission (RDC), acting in the capacity as the governing body of HAND, oversees the duties and responsibilities of HAND, including the Community Development Block Grant and HOME programs. Recommendations made by HAND related to the HUD programs covered by this Plan are forwarded to the Redevelopment Commission as the first step in the approval process for programming and budgeting. The Redevelopment Commission then forwards the recommendations on to the Mayor and City Council.

To assist with funding decisions related to the CDBG Program, the City appoints a Citizen's Advisory Committee (CAC) for two categories of disbursement: social services and physical improvements. Each CAC is comprised of RDC members and Bloomington residents and staffed by HAND. Each CAC reviews an application for funding created by HAND staff, determines a point scoring system for the application, conducts site visits with the applicant agencies and evaluates final proposals.

Effective Date

This Citizen Participation Plan is considered effective once approved by the HAND Director and submission with its Consolidated Plan for 2020-2024 if required by HUD. The Plan shall be effective until it is amended or otherwise replaced.

B. Encouragement of Citizen Participation

General

The City provides for and encourages citizens to participate in the development, revision, amendment, adoption and implementation of the Citizen Participation Plan, the Consolidated Plan, the Annual Action Plan and the CAPER. The City encourages participation by low- and moderateincome persons, particularly those living in areas designated as revitalization areas or in slum and blighted areas, in areas where HUD funds are proposed to be used, and by residents of predominantly low- and moderate- income neighborhoods. With respect to the public participation initiatives included in this Plan, the City will take appropriate actions to encourage the participation of all its citizens, including minorities, non-English speaking persons, and persons with disabilities, as described below.

Non-English Speakers

The City has determined that there is a need to provide language assistance to native Spanish speaking residents who speak English less than very well. To encourage these residents to participate in the development of the plans covered by this Plan, the City will undertake the following initiatives:

- Advance notice of public meetings and how to participate in the planning process will be provided by the Latino Outreach Coordinator to *Boletin Comunitario* (the local monthly Spanish language publication which informs residents about programs, services and current issues) and *Hola Bloomington* (the local Spanish language radio program featuring news, entertainment and public opinion every Friday evening from 6-7 pm on WFHB 91.3 FM and 98.1 FM).
- Provide bilingual agendas, handouts and surveys at meetings and stakeholder interviews conducted for each planning process covered by this document within an advance notice of five days of such a request.
- Have a Spanish interpreter available at public meetings where Spanish-speaking persons with LEP are likely to attend or when an interpreter is requested with five days advance notice of such request.
- Include language regarding residents who have limited English proficiency (LEP) in all public notices. (updated May 2023)

Persons with Disabilities

To encourage the participation of persons with disabilities, the City will include the following language in all public meeting notices published in the Herald-Times **(updated May 2023)**:

The City of Bloomington will make reasonable accommodations and services necessary for citizens with disabilities at the public meeting, as well as provide meaningful access to participation by limited English proficient (LEP) residents. Interpretation services will be offered upon request and availability for those who may have limited English proficiency as required by Code of Federal Regulations (24) 91.105 and 91.115. Persons requiring such accommodations/services should contact the City at least five working days in advance

of a scheduled meeting by calling 812.349.3420 or by emailing <u>hand@bloomington.in.gov</u>. Residents may also visit in person to ask questions at City Hall, located at 401 N. Morton St., Bloomington, 47404.

The City will conduct all public meetings in locations that are handicapped-accessible.

Low- and Moderate-Income Persons

The City will conduct at least one public meeting in a neighborhood that contains at least 51% lowand moderate-income residents during the development of the Consolidated Plan and the Annual Action Plan.

Organizations and Agencies

The City encourages the participation of local and regional institutions, the Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations in the process of developing, revising, amending, adopting and implementing all documents covered by this Plan. This will be achieved through stakeholder interviews, focus groups and/or public meetings.

Local Public Housing Authority

The City encourages, in consultation with Bloomington Housing Authority (BHA), the participation of residents of any public housing developments located within the City, in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan. The City will provide information to the executive director of BHA about the Consolidated Plan activities related to the public housing developments and communities so that the Authority can make this information available at the annual public hearings required for its Public Housing Authority Agency Plan.

Public Notices

Public review/comment periods and public hearings held in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan shall be advertised in the Herald-Times no less than seven days before a public meeting is held. *Starting in Program Year 2024, the City will also make efforts to publish notices on social media and on the City's website.* **(Updated May 2023)**

Public Hearings

All public hearings will be scheduled at times and locations that are convenient for potential and actual program beneficiaries, and with accommodation for persons with disabilities and non-English Spanish speakers in accordance with this Plan.

Technical Assistance

Prior to the application submission deadlines, HAND staff will provide technical assistance to interested applicants. Assistance will be provided on an individual or group basis depending on the needs of the organization. Technical assistance will focus on the various elements of the application including the federal statutory and regulatory requirements.

Online Access

The City will post draft copies and final copies of all documents covered by this Plan on its website accessible at <u>https://bloomington.in.gov/housing/notices</u>

Other Engagement Techniques

The Plan may be amended as the City continues to gain access to technology that improves the avenues of participation by its residents.

HAND Director

All communication regarding the Plan, the Consolidated Plan, the Annual Action Plan, the CAPER, comments, complaints, reasonable accommodation for disabled persons, translation services, or other elements shall be directed to: Director of HAND, <u>hand@bloomington.in.gov</u>, 812-349-3420.

C. The Citizen Participation Plan

Amendments to the Approved Citizen Participation Plan

The City shall follow the following procedure to amend its approved Citizen Participation Plan, as needed.

a. Amendment Considerations

The City will amend the Plan, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to its HUD programs. Substantial amendments to the Citizen Participation Plan may be required should a provision of the Plan be found by the City to conflict with HUD regulations, or when changes in HUD regulations occur, or based on current HUD guidance. Edits to the Plan that only include updated contact information or editorial changes for clarity will not be released for public review and comment.

b. Draft Amended Plan Review

The draft Amended Plan will be made available for public review for a 30-day period concurrently with the public review and comment process for the Consolidated Plan. Copies of the draft Amended Plan will be made available for review at the following locations:

- HAND Office: 401 N. Morton Street, Suite 130
- Monroe County Public Library: 303 E. Kirkwood Avenue
- <u>https://bloomington.in.gov/housing/notices</u>

c. Comments Received on Draft Amended Plan

Written comments will be accepted by the HAND Director, or a designee, during the 30-day public review period.

d. Submission to HUD

A copy of the Amended Citizen Participation Plan, including a summary of all written comments and those received during the public hearing as well as the City's responses and proof of compliance with the minimum 30-day public review and comment period requirement, will be submitted to HUD, if required. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

Plan Access

The approved Amended Citizen Participation Plan will be kept on file at the HAND office. The plan can be accessed online at: https://bloomington.in.gov/housing/notices.

Hard copies can be made available to those requesting the approved Amended Plan by contacting the HAND Director, or a designee.

D. The Consolidated Plan (CP)

Plan Development

The City will follow the process and procedures described below in the development of its Consolidated Plan (CP).

a. Stakeholder Consultation and Citizen Outreach

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

- Bloomington Housing Authority
- Other 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 families, homeless persons, and other protected classes
- Local or state health and child welfare agencies related to lead-based paint hazards and poisonings, including the health department
- Community-based and regionally based organizations that represent protected class members and organizations that enforce fair housing laws
- Regional government agencies 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 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 CP and how to access a copy online for review and comment.

A variety of mechanisms may be utilized to solicit input from these persons/service providers/agencies/entities. These include written letters, telephone or in-person interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

b. Public Hearings

The City will conduct at least two public hearings in the development of the CP. The first public hearing will be conducted before the draft CP is published for public comment, during which the City will address housing and community development needs, development of proposed activities, the amount of assistance the City expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public hearing will be conducted during or after the 30-day public comment period during which the City will address identified housing and community development needs and proposed eligible activities.

c. Potential Displacement of Persons

Although the City does not anticipate any residential displacement to occur in the foreseeable future, it is required to describe its plans to minimize the displacement of persons and to assist any persons displaced. When displacement is unavoidable on a temporary or permanent basis, the City will comply with the federal Uniform Relocation Act. Should displacement of residents be necessary as a result of the use of funds covered by this Plan, the City shall compensate residents who are actually displaced in accordance with *HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition*. This resource is accessible online at:

https://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/affordableho using/training/web/relocation/displaced

d. Redevelopment Commission Action

Following the public hearings, the CP will be presented to the RDC for consideration and formal action.

e. Common Council Action

Following RDC approval, the CP will be presented to the Common Council for approval.

f. Public Display and Comment Period

The draft CP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CP; the anticipated amounts of funding (including program income, if any); proposed activities likely to result in displacement, if any; plans for minimizing the displacement of persons as a result of CDBG activities, if any; plans to assist persons actually displaced by the project, if any; the dates of the public display and comment period; the locations where copies of the draft CP can be examined; how comments will be accepted; and, the anticipated submission date to HUD. Copies of the draft CP will be made available for review at the following locations:

- HAND Office: 401 N. Morton Street, Suite 130
- Monroe County Public Library: 303 E. Kirkwood Avenue
- <u>https://bloomington.in.gov/housing/notices</u>

g. Comments Received on the Draft Consolidated Plan

Written comments will be accepted by the HAND Director, 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 CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CP for submission to HUD.

h. Submission to HUD

The CP will be submitted to HUD no less than 45 days before the start of the City's five-year program cycle, unless otherwise directed by HUD in writing.

Revisions to the Consolidated Plan

The City shall follow the following procedure to revise its CP, as needed.

a. <u>Revision Considerations</u>

There are two types of amendments that may occur with the CP: minor amendments and substantial amendments. An amendment to the approved CP is considered substantial under the following circumstances:

- A reallocation of 50% or more of available program funds
- The funding of a project or activity not previously described in the CP
- A substantial change in the scope, purpose, location or beneficiaries of an activity.

All other changes that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by the HAND Department and will not be subject to public comments. These changes will be fully documented and signed by the Director of HAND.

The City may choose to submit a copy of each amendment to the CP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the Director of HAND.

b. Public Display and Comment Period

The draft Revised CP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the proposed revised CP can be examined, how comments will be accepted, when the document will be considered for action by the RDC, and the anticipated submission date to HUD. Copies of the draft Revised CP will be made available for review at the following locations:

- HAND Office: 401 N. Morton Street, Suite 130
- Monroe County Public Library: 303 E. Kirkwood Avenue
- <u>https://bloomington.in.gov/housing/notices</u>

c. <u>Comments Received on the Draft Revised Consolidated Plan</u>

Written comments will be accepted by the HAND Director, 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 a public meeting, in preparing the final Revised CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised CP for submission to HUD.

d. Submission to HUD

The Revised CP will be submitted to HUD following the end of the public display and comment period.

In the Event of a Disaster or Pandemic (Formally amended June 30, 2020)

In the event of a federally declared disaster where program funds covered by this Plan may be expended to carry out eligible activities to address the City's disaster or pandemic response, the City's requirements under this Plan will be streamlined to include:

- a. A five day public display and comment period to amend the CP.
- b. At a public hearing, the Revised CP will be presented to the RDC for consideration and formal action.
- c. The Revised CP will be submitted to HUD upon RDC approval.

In the event of a local, state, or federally declared disaster or emergency where public places may be closed to the public or in person participation may not be feasible or large gatherings may be considered a public health risk, the City of Bloomington may opt to conduct public hearings and meetings virtually via conference call or live web-streaming with the ability to ask questions and provide comments in real time. Accommodations will be made for person with disabilities and non-English speaking persons upon request, such as sign language or language interpretation services. Documents for public review will be shared via the City of Bloomington's website. Copies of the document may be mailed or emailed upon request to hand@bloomington.in.gov.

<u>Plan Access</u>

The Revised CP will be kept on file at the HAND Department, 401 N. Morton Street, Suite 130. The plan can be accessed online at <u>https://bloomington.in.gov/housing/notices</u>

Hard copies can be made available to those requesting the approved Amended CP by contacting the HAND Director, or a designee at: <u>hand@bloomington.in.gov</u> with the words, Revised Consolidate Plan" in the subject line.

E. The Annual Action Plan (AAP)

The Annual Action Plan (AAP) is a component of the Consolidated Plan, and it describes the City's proposed use of available federal and other resources to address the priority needs and specific objectives in the CP for each program year; the City's method for distributing funds to local non-profit organizations; and, the geographic areas of the City to which it will direct assistance.

Plan Development

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

a. Public Hearings

The City will conduct at least two public hearings during the development of the AAP. The first public hearing will be conducted before the AAP draft is published for public comment, during which the City will address housing and community development needs, development of proposed activities, the amount of assistance the City expects to receive (including grant funds and program income), and the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents. *This hearing, held at a regularly scheduled meeting of the Bloomington Redevelopment Commission, may include approval of recommended projects by the Citizens Advisory Committee (CAC).* **(Updated May 2023)**

At the second public hearing the City will address identified housing and community development needs and proposed eligible activities. *This hearing may be held at a regularly scheduled meeting of the Bloomington Common Council in order to approve project recommendations from the CAC and RDC.* **(Updated May 2023)**

Both public hearings conducted for the Year 1 AAP may be conducted concurrently with the required public hearings for the five-year Consolidated Plan.

b. Redevelopment Commission Action

At a public hearing *(mentioned above)*, the AAP will be presented to the RDC for consideration and formal action.

c. Common Council Action

Following RDC approval *(mentioned above)*, the AAP will be presented to the Common Council at a public hearing for approval.

(Updated May 2023)

d. Public Display and Comment Period

The draft AAP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary 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, and the anticipated submission date to HUD. Copies of the draft AAP will be made available for review at the following locations:

- HAND Office: 401 N. Morton Street, Suite 130
- Monroe County Public Library: 303 E. Kirkwood Avenue
- <u>https://bloomington.in.gov/housing/notices</u>

e. Comments Received on the Draft Annual Action Plan

Written comments will be accepted by the HAND Director, 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 a public meeting, 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 attached to the final AAP for submission to HUD.

f. Submission to HUD

The AAP will be submitted to HUD no less than 45 days before the start of the City's annual program year, unless directed otherwise by HUD in writing.

Revisions to the Annual Action Plan

The City shall follow the following procedure to revise its AAP, as needed.

a. <u>Revision Considerations</u>

There are two types of amendment that may occur with the AAP: minor amendments and substantial amendments. An amendment to the approved AAP is considered substantial under the following circumstances:

- When an eligible activity is added
- When a change occurs in the purpose, location, or beneficiaries of an activity previously approved

All other changes to funding allocations or approved eligible activities that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by the HAND Department and will not be subject to public comments. These changes will be fully documented and signed by the Director of HAND.

The City may choose to submit a copy of each amendment to the AAP to HUD as it occurs, or at the end of the program year. Documentation of the amendments shall be transmitted via email by the Director of HAND.

b. Public Display and Comment Period

The draft Revised AAP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the revisions, 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, and the anticipated submission date to HUD. Copies of the draft Revised AAP will be made available for review at the following locations:

- HAND Office: 401 N. Morton Street, Suite 130
- Monroe County Public Library: 303 E. Kirkwood Avenue
- <u>https://bloomington.in.gov/housing/notices</u>

c. Comments Received on the Draft Revised Annual Action Plan

Written comments will be accepted by the HAND Director, 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 public hearings, in preparing the final Revised AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised AAP for submission to HUD.

d. Submission to HUD

The Revised AAP will be submitted to HUD following the end of the public display and comment period.

In the Event of a Disaster or Pandemic (formally amended June 30, 2020)

In the event of a local, state or federally declared disaster where program funds covered by this Plan may be expended to carry out eligible activities to address the City's disaster or pandemic response, the City's requirements under this Plan will be streamlined to include:

- a. A -five day public display and comment period to amend the AAP.
- b. At a public hearing, the Revised AAP will be presented to the RDC for consideration and formal action.
- c. The Revised AAP will be submitted to HUD upon RDC approval.

In the event of a local, state, or federally declared disaster or emergency where public places may be closed to the public or in person participation may not be feasible or large gatherings may be considered a public health risk, the City of Bloomington may opt to conduct public hearings and meetings virtually via conference call or live webstreaming with the ability to ask questions and provide comments in real time. Accommodations will be made for person with disabilities and non-English speaking persons upon request, such as sign language or language interpretation services. Documents for public review will be shared via the City of Bloomington's website. Copies of the document may be mailed or emailed upon request to hand@bloomington.in.gov.

Plan Access

The Revised AAP will be kept on file at the HAND Department, 401 N. Morton Street, Suite 130.

The plan can be accessed online at <u>https://bloomington.in.gov/housing/notices</u>.

Hard copies can be made available to those requesting the approved Amended AAP by contacting the HAND Director, or a designee at: <u>hand@bloomington.in.gov</u> with the words, Amended Annual Action Plan" in the subject line.

F. Consolidated Annual Performance and Evaluation Report (CAPER)

Report Development

The City shall follow the following procedure in the drafting and adoption of its Consolidated Annual Performance and Evaluation Report (CAPER).

a. <u>Report Considerations</u>

HAND will evaluate and report the accomplishments and expenditures of the previous program year for CDBG and HOME funds and draft the CAPER in accordance with HUD requirements.

b. Public Display and Comment Period

The draft CAPER will be placed on display for a period of no less than 15 days to encourage public review and comment. Public notice of the display and comment period will be published in the local newspaper or facsimile thereof before the comment period begins with accommodation for persons with disabilities and non-English Spanish speakers in accordance with this Plan. 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 following locations:

- HAND Office: 401 N. Morton Street, Suite 130
- Monroe County Public Library: 303 E. Kirkwood Avenue
- <u>https://bloomington.in.gov/housing/notices</u>

c. Comments Received on the Draft CAPER

Written comments will be accepted by the HAND Director, 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 attached to the final CAPER for submission to HUD.

d. Submission to HUD

The CAPER will be submitted to HUD within 90 days following the end of the City's annual program year.

G. Section 108 Loan Guarantee Program

Development of Section 108 Loan Guarantee Application

Applications for assistance filed by the City for Section 108 Loan Guarantee assistance authorized under HUD regulation 24 CFR Part 570, Subpart M, are subject to all provisions set forth within this Plan. Such applications for Section 108 assistance may be included as part of the Consolidated Planning process or may be undertaken separately anytime during the City's program year.

Before the City submits an application for Section 108 loan guarantee assistance, the City will make available to citizens, public agencies and other interested parties information that includes the amount of assistance the City expects to be made available (including program income), the range of activities that may be undertaken, the estimated amount that will benefit persons of low- and moderate-income, and any activities likely to result in displacement.

Public Display and Comment Period

The City will publish its proposed Section 108 loan application for review and comment. The public notice shall include a summary describing the contents and purpose of the application and listing the locations where the entire application may be examined. An application for Section 108 Loan Guarantee funding shall be made available for public review for a 30-day period prior to consideration and submission to HUD and may be done concurrently with the public review and comment process for the Consolidated Plan.

Copies of the proposed Section 108 loan application will be made available for review at the following locations:

- HAND Office: 401 N. Morton Street, Suite 130
- Monroe County Public Library: 303 E. Kirkwood Avenue
- <u>https://bloomington.in.gov/housing/notice</u>s

Comments Received on the Proposed Section 108 Application

Written comments will be accepted by the Contact Person, 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 in preparing the final application. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final application for submission to HUD.

Submission to HUD

The Section 108 Loan Application will be submitted to HUD upon approval by the RDC.

H.Complaints

Residents may register complaints regarding any aspect of the CDBG or HOME programs by contacting the HAND Director, or a designee. All written complaints received will be addressed in writing within 15 days.

Residents wishing to object to HUD approval of any documents covered by this Plan may send written objections to the HUD Field Office at US Department of HUD, 575 N. Pennsylvania Street, Suite 655, Indianapolis, IN 46204. Objections should be made within 30 days after the City has submitted any of the documents covered by this Plan to HUD. Any objections made will only be submitted to HUD for the following reasons:

- The applicant's description of needs and objectives is plainly inconsistent with available facts and data
- The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant
- The application does not comply with the requirements of the CDBG or HOME programs or other applicable laws
- The application proposed activities which are otherwise ineligible under the program regulations.

Objections shall include both an identification of requirements not met and available facts and data.