



## **Section I – Applicability**

This Citizen Participation Plan (CPP) was developed in accordance with federal regulations 24 CFR Part 91 and Section 104(a)(3) of the Housing and community Development Act of 1974, as amended. The Jefferson HOME Consortium has developed and adopted this CPP which sets forth the policies and procedures for resident participation for all the member communities of the Jefferson HOME Consortium.

The Jefferson HOME Consortium (hereinafter often referred to simply as "the Consortium") includes the following member communities: Jefferson Parish, the City of Kenner and St. Charles Parish. The Consortium was created under HUD's HOME Investment Partnerships (HOME) program. All incorporated municipalities located in the Consortium participate in the HOME program. With the exception of the City of Kenner, all municipalities in Jefferson participate in the parish's Community Development Block Grant (CDBG) program. The City of Kenner is recognized by HUD as a separate and independent entitlement community, and, therefore, receives and administers its own CDBG program and submits its own CAPER.

Since Jefferson Parish is responsible for the administration of the HOME program for the Consortium, the Jefferson Parish Department of Community Development works closely with the Community Development Department of the City of Kenner and the Department of Community Services of St. Charles Parish and serves as the lead agency in developing and implementing this Citizen Participation Plan (CPP).

These policies and procedures apply to the following HUD community planning and development programs: the Community Development Block Grant (CDBG) program, the Home Investment Partnerships (HOME) program, and the Emergency Shelter Grant (HESG) program. They also apply particularly to the development of the Citizen Participation Plan (and substantial amendments thereto), the Consolidated Plan and annual Action Plans (and substantial amendments thereto), and the Consolidated Annual Performance and Evaluation Report (CAPER) and the Assessment of Fair Housing (AFH).

This Citizen Participation Plan is designed to provide a framework for residents to participate in a noncompulsory role in identifying needs and priorities, and in planning, implementing and evaluating all affected programs, projects and activities of the Jefferson HOME Consortium.

## **Section II-Standards of Resident Participation**

The Jefferson HOME Consortium shall provide for full public access to program information and make affirmative efforts to make adequate information available to residents. All reasonable inquires about program operations dealing with general matters, aggregate data, and endeavors affecting residents will be fully and expeditiously responded to and disclosed.

There shall be reasonable efforts taken to encourage residents to participate in the development of the Citizen Participation Plan (and substantial amendments thereto), the Consolidated Plan and Annual Action Plans, and the Assessment of Fair Housing (and substantial amendments thereto all), and other activities and services administered through the Jefferson HOME Consortium.

These efforts apply particularly to low and moderate income persons, residents of low and moderate income neighborhoods, minorities, non-English speaking persons, and persons with disabilities.

These efforts also apply particularly to residents of public and assisted housing developments. In this regard, there shall be reasonable efforts taken to provide information to all PHA's located within the Consortium on consolidated plan activities, particularly for their annual public hearings.

There shall also be reasonable efforts to ensure a continuity of various segments of the community to include, civic and neighborhood organizations, faith-based organizations, involvement from the business community and other organizations that have demonstrated interest and concern in community planning and development programs.

All aspects of resident participation shall be conducted in an open manner with freedom of access for all interested persons.

Residents shall be given adequate and timely information so as to enable them to be meaningfully involved in important decisions at various stages of all activities.

The appropriate member community of the Jefferson HOME Consortium will respond to all written views and proposals it receives. All responses will state the action taken and the reason for such action.

Residents are encouraged to participate at each stage of the program year to include:

- A. Identifying and Prioritizing the Needs of the Community
- B. Proposal Development and Evaluation Stage  
A proposal will be considered at any time prior to the final submittal date established by the Departments of Community Development. Member communities of the Consortium will evaluate proposals and make recommendations as appropriate.

C. Program Implementation

Where practical, resident views and comments will be solicited from area residents on funded projects at the preliminary design stage and other stages of implementation.

The Consortium shall take into account the views and comments of residents while making decisions affecting the Consolidated Plan, and substantial amendments thereto, annual Action Plans, and substantial amendments thereto, the Consolidated Annual Performance and Evaluation Report (CAPER) and the Assessment of Fair Housing (AFH).

### **Section III - Methods of Submission of Views and Comments**

Residents and community organizations, particularly low and moderate income persons and residents of low income areas, are encouraged to submit views and proposals on housing and community development needs as follows:

1. Directly to the appropriate Parish or City Council,
2. Directly to the appropriate Parish President or Mayor,
3. Directly to the appropriate local governmental agencies to include the Jefferson Parish Department of Community Development located at the Joe Yenni Building, 1221 Elmwood Park Blvd. Suite 605, Jefferson, LA 70123, (504) 736-6262
4. City of Kenner, Community Development Department and the Department of Community Services of St. Charles Parish,
5. Directly to members of Citizen Advisory Committees,
6. Directly to members of the Community Development Review Committee for the City of Kenner only.
7. At community organization meetings and other meetings that may be scheduled by Jefferson Parish, the City of Kenner, or St. Charles Parish.
8. At formal public hearings.
9. To local civic associations or other special resident committees.

### **Section IV - Assessment of Performance**

Residents shall be given the opportunity to assess and submit comments on all aspects of the Consortium's performance and capacity in carrying out the Consolidated Plan, including program performance and the performance of sub-grantees and contractors and the AFH.

The Consortium shall prepare a Consolidated Annual Performance and Evaluation Report (CAPER) on the use of program funds in accordance with HUD requirements:

The Consortium shall publish a newspaper notice that the CAPER is available for review and comment prior to its submission to HUD. A mailing regarding this notice may also be sent to civic and neighborhood organizations, faith-based organizations, and other organizations that have demonstrated an interest and concern in community planning and development programs when feasible. Such notices shall provide a period of not less than fifteen (15) days to receive comments on said report before it is submitted to HUD.

Residents may submit written comments on the CAPER, and the Consortium shall respond to these comments in a timely manner.

A summary of resident comments shall be attached to the CAPER.

## **Section V - Resident Committees**

Each member of the Consortium may establish additional methods of resident participation to include the establishment of resident committees whose primary purpose will be to ensure that the views and comments of all residents potentially affected by these programs will be included in the development and implementation of the specific activities.

Members shall represent low to moderate income neighborhoods, shall be active members of local civic associations, and shall be politically independent.

These resident committees will coordinate when feasible with the Consortium member Directors and staff of the Community Development Departments to establish workable By-Laws to include membership (representation, method of appointment, number, and other issues) and meetings (number, place, time, and other aspects of meetings).

These committees will coordinate all actions with the Directors and staff of the Community Development Departments to help ensure the full dissemination of information pertaining to programs administered through the department.

These committees may also hold neighborhood meetings in cooperation with representatives of civic organizations at various stages of the program to explain activities and obtain resident views and comments on area activities.

This CPP shall be the major guideline for establishing the role and responsibilities of the resident committees and any substantial changes that expand or alter the duties of these resident committees shall be subject to the CPP amendment procedure.

Types of specific activities which these committees may undertake include:

- Notifying area residents, particularly low and moderate-income residents, of specific activities (and meetings related to such activities) planned to be undertaken as listed in the current Consolidated Plan and/or annual Action Plans;
- Attending public hearings to list the prioritized needs of the area they represent;

- Organizing meetings to discuss issues relative to the Consolidated and/or Action Plans, and to identify and prioritize area needs;
- Attending neighborhood organization meetings and documenting the proceedings;
- Working cooperatively with municipalities and established civic and community organizations; and
- Completing and presenting a written list of viable projects and activities that will address the needs of the areas they represent.

## **Section VI - Specific Methods for Residents to Participate**

### **A. Public Hearings**

- The Consortium will hold a minimum of two (2) formal public hearings per year (at two separate stages in the planning process) at times and places conducive to resident attendance.
- Public hearings and informational meetings will be scheduled at convenient times and locations which permit broad participation, particularly by low and moderate income persons and residents of low income areas.
- Arrangements will be made as needed to provide for full participation by the handicapped and non-English speaking person at public meetings.
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- Each member of the Consortium may hold one or more additional public hearings and other public meetings other than those specific in this Plan.

#### ***Formal Public Hearings 1:***

The Consortium will hold a public hearing (or hearings) at the time plans are being formulated for the next program year, generally in the January – March period of the calendar year, to obtain views and proposals from residents on housing and community planning and development needs and priorities. At this public hearing (or hearings) the following program information shall also be provided to residents:

- a. The total estimated amount of funds expected to be available to the Consortium for community development and housing activities.
- b. The range of activities that may be undertaken with these funds and the process for developing and submitting proposals.
- c. The plans for minimizing the displacement of persons as a result of activities assisted with program funds and for assisting a person actually displaced as a result of such activities.
- d. The process to be followed in drawing up the Consolidated Plan and/or the annual Action Plan.
- e. The role of residents in the Consolidated Planning process as provided for in this CPP.

- f. The Assessment of Fair Housing (AFH) and efforts to Affirmatively Further Fair Housing (AFFH).
- g. A summary of other important program requirements.

***Formal Public Hearings No 2:***

After the completion of the Draft Consolidated Plan or Annual Plan, and before the adoption of the final Consolidated Plan or Action Plan, there shall be a public hearing during the required 30 day resident review and comment period. Information to be provided at this public hearing include a summary of the proposed Consolidated Plan or Annual Plan and the specific projects and activities proposed for the next fiscal year.

***Other Formal Public Hearings:***

A public hearing will also be normally scheduled in conjunction with the meetings of the Jefferson Parish Council at which Consolidated Plan and/or the annual Action Plan, and substantial amendments thereto, are on the agenda. This public hearing may be used as formal public hearing No. 2.

***Other Public Meetings:***

Consortium Members may elect to hold neighborhood level meetings, to conduct other general information meeting or meetings to discuss specific issues as they deem appropriate.

**B. Public Notices :**

The Consortium shall publish a newspaper notice and/or Jefferson Parish website notification and other appropriate media regarding public hearings at least 1 week (7 days) prior to such hearings. The notices will indicate the date, time, place and procedures of the hearing and topics to be considered. Notices may also be distributed in special mailings, electronic messages and other means as deemed appropriate.

***Specific Public Notices:***

Review of Plans - A summary of the Consolidated Plan and/or annual Action Plan, and a list of the locations where electronic and full hard copies of plans may be examined during the required 30-day resident review and comment period. A limited number of additional copies of this plans will be available to other interested parties.

Final Plan Notice - When the Consolidated Plan and/or annual Action Plan is submitted to HUD, the Consortium will publish a notice in the newspaper and/or Parish Website as appropriate stating that the plan has been submitted and that electronic and/or a limited number of copies will be available to interested persons without charge upon request.

*CAPER Public Notice* -The Consortium shall publish a public notice that the Consolidated Annual Performance and Evaluation Report (CAPER) is available for review and comment prior to submission to HUD. Such notices shall provide a period of not less than fifteen (15) days to receive comments on said report prior to its submission to HUD.

*Other Public Notices*

Consortium members generally will publish public notices in regard to other significant action in the newspaper of record and/or on the Parish Website including:

- Environmental review regulations including required flood plain notices;
- Fair Housing (AFFH) and Equal Opportunity Notices;
- Assessment of Fair Housing (AFH)
- Request for Proposals; and
- Notices for other public meetings for Special Events.

**Section VIII- Other Outreach and Resident Participation Efforts**

**A. Information Resources**

- A. The Consortium will make copies of the Citizen Participation Plan, the proposed and Annual Action Plan, the CAPER, the AFH and the proposed time frame for the application submission (the Planning Schedule) available at all public hearings and at the Departments of Community Development during normal working hours.
- B. The Consortium will maintain a mailing and/or electronic email lists of agencies, service providers, civic and neighborhood organizations, faith-based organizations and other interested resident groups, including public housing authorities and agencies assisting the homeless, disabled and elderly, and will send direct mail to these organizations, as appropriate, to insure full public notification on anticipated actions by member communities of the Consortium.
- C. The Consortium will maintain mailing lists and or electronic email lists for civic and neighborhood organizations, faith-based organizations, housing providers, homeless providers and other special interest groups. Special mailings to any or all of the agencies and organizations on these lists are used to keep residents informed and up-to-date on program information, training or informational workshops, and other activities or events of the Consortium.

- D. The Consortium will periodically conduct a survey of residents residing in the low and moderate income areas of the Consortium. This and similar outreach efforts will be used to build a data base that is representative of attitudes of the residents of the Consortium's low and moderate income areas. The analysis of the responses and differences among the respondents' replies should help to identify those areas where concerns or issues are not being met or where dissatisfaction has been expressed either by the residents in general or by identifiable segments of the population. The analysis of responses will also help the Consortium to direct its limited resources in addressing neighborhood and community issues.
- E. The Community Development Department of Jefferson Parish will maintain staff whose duties include:
- Coordinating public notices,
  - Publishing a newsletter,
  - Assisting the Jefferson Citizen Advisory Committee,
  - Developing flyers and pamphlets for special events,
  - Developing program brochures, and
  - Coordinating special events such as housing fairs, HUD Consultation, technical assistance workshops, and other outreach efforts.

**B. Technical Assistance**

- A. The appropriate staff of each member community of the Consortium responsible for the implementation of the Consolidated Plan and annual Action Plan will be available as feasible to provide technical assistance as requested by residents and community organizations to facilitate full and active resident participation in the planning, implementing and assessing of program activities, especially for developing proposals for funding.
- B. Annual technical assistance workshops for community organizations.

**C. Development of the Consolidated Plan and the Assessment of Fair Housing**

In the development of the Consolidated Plan the Consortium will undertake the following:

- Consult with adjacent parishes (counties) and agencies with metropolitan-wide planning responsibilities when feasible on problems and strategies that will affect areas outside the limits of the Consortium.

- Make available to residents, public agencies, and other interested parties information that includes the amount of assistance, including grant funds and program income, the Consortium expects to receive each year, and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderated income.
- Create focus group committees when feasible to identify needs and recommend strategies for addressing priority needs on the following topics and areas of interest that must be addressed in the Consolidated Plan: affordable housing, community development and quality of life issues, economic development, homelessness and the special populations. To ensure that the plan is comprehensive, the membership of these committees may include representatives from appropriate public and private housing and social service agencies, both state and local, and local governmental departments.
- Consult with other public and private agencies that provide assisted housing, health services, and social services, including those which primarily focus on services to children, the elderly, those with disabilities, persons with HIV/AIDS and their families, and the homeless.
- Consult with state or local health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings when preparing the portion of the Consolidated Plan concerning lead-based paint hazards.
- Notify adjacent parishes (counties) to the extent practical, and submit this portion of the plan to the appropriate departments and/or agencies when preparing the description of priority non-housing community development needs.
- Consider any comments or views of residents received in writing, orally at public hearings, in preparing the final draft of the Consolidated Plan, Action Plans, AFH and others. A summary of these comments and views, as well as those not accepted and the reasons therefore, shall be attached to the final draft of the Consolidated Plan.
- For the development of both the AFH and the Consolidated Plans the grantee will make available to the public, residents, public agencies, and other interested parties any HUD-provided data (including HUD websites) and other supplemental information the grantee plans to incorporate into its AFH at the start of the public participation process (or as soon as feasible after).
- The grantee will publish the proposed AFH and the proposed consolidated plan in a manner that affords residents, units of general local government, public agencies, and other interested parties a reasonable opportunity to examine its content and to submit comments as required by HUD (30 days or 45 days when in collaboration with PHAs).
- The Jefferson HOME Consortium will make public the proposed draft AFH and Consolidated Plans through the Jefferson Parish website with other notifications when appropriate and required to give reasonable opportunity to examine each document's content.

- The requirement for publishing will be met by publishing a notice of availability of each document in one or more newspapers of general circulation, and by making copies of each document available on the Internet, on the grantee's official government web site, as well as at libraries, government offices, and public places where feasible.
- The summary will describe the content and purpose of the Consolidated Plan or the AFH, as applicable, and will include a list of locations where copies of the entire proposed document may be examined.
- A number of free copies of the Consolidated Plan or the AFH, as applicable, will be provided to residents and groups that request a copy of the plan or the AFH.
- At least one public hearing during both the development of the AFH and development of the consolidated plan and must provide a period, not less than 30 calendar days, to receive comments from residents of the community on the consolidated plan or the AFH.
- The required public hearing will occur before the proposed consolidated plan is published for comment.
- The Jefferson HOME Consortium will consider the comments or views of residents, whether received in writing or orally at the public hearings, in preparing in the final AFH or the final consolidated plan. A summary of any comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final AFH or the final consolidated plan.

#### **D. Public Housing**

- Under 91.100(c)(1), the jurisdiction will consult with the 4 public housing authorities (PHAs) operating in the jurisdiction. This consultation will continue to consider public housing needs, planned programs and activities under the consolidated plan.
- Consultation with PHAs operating in the jurisdiction will also include the Assessment of Fair Housing and proposed actions and strategies for affirmatively furthering fair housing
- The consultation process with the PHAs will continue to require the jurisdiction to address the needs of public housing and, where necessary, the manner in which it will provide financial or other assistance to a troubled PHA to improve the PHA's operations and attempt remove the designation of troubled.
- As per the regulation under § 91.100(c)(1), the jurisdiction will obtain PHA input on addressing fair housing issues in the public housing and Housing Choice Voucher programs. Additionally, consultations will seek to include any resident advisory boards, resident councils, and resident management corporations where available.
- Under § 91.100(c)(2) for local governments the PHA consultation process will work to ensure that activities with regard to affirmatively furthering fair housing are fully

coordinated to achieve comprehensive community development goals and affirmatively further fair housing. Additionally, if a PHA is required to implement remedies under a Voluntary Compliance Agreement, the grantee will work with or consult with the PHAs, as appropriate, to identify actions the grantee may take, if any, to assist the PHA in implementing the required remedies.

#### **E. Housing Organizations**

- As per Section 91.100(e)(1)-(3) - for local governments, the jurisdiction will specifically address affirmatively furthering fair housing organizations in the consultation process.
- The local jurisdiction will consult with community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws, to the extent that such entities operate within the grantee's area, such as state or local fair housing enforcement agencies, including:
  - Fair Housing Assistance Program (FHAP) organizations; and
  - Fair housing organizations; and
  - Nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP); and
  - Other public and private fair housing service agencies, and any organizations that have relevant knowledge or data to inform the AFH

#### **F. Non English Speaking Residents**

- Assistance will be provided to non-English speaking residents of the community, as per§ 91.105(a)(4) for local governments through the assessment of language needs and including provision of services such as for translation of notices and other vital documents.
- The Jefferson HOME Consortium will take reasonable steps to provide language assistance to ensure meaningful access to participation by Non-English speaking and limited English proficiency residents of the community including for Spanish and Vietnamese speaking residents when appropriate.
- The Jefferson HOME Consortium uses U.S. Census and other data to identify Low English Proficiency (LEP) areas. Public meetings with translators, media outreach in Spanish and participation methods will be used to engage Non English speaking residents where appropriate.

#### **G. Other Actions**

- Under§ 91.105(t) for jurisdictions and the Jefferson HOME Consortium will provide residents of the community with reasonable and timely access to local meetings, consistent with accessibility and reasonable accommodation requirements. in accordance with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR part 8 as well as the Americans with Disabilities Act and implementing regulations at 28 CFR part 35 and 36, as applicable.

- The Jefferson HOME Consortium will make available to the public, residents, public agencies, and other interested parties any HUD-provided data and other supplemental information the grantee plans to incorporate into its AFH at the start of the public participation process (or as soon as feasible after).
- Availability of documents to the public: As per § 91.105(g) for local governments the Jefferson HOME Consortium will make planning documents and any subsequent substantial revisions available to the public in the following manner:
  - A. Directly at Public Meetings and other venues,
  - B. Directly from the Jefferson Parish Department of Community Development located at the Joe Yenni Building, 1221 Elmwood Park Blvd. Suite 605, Jefferson, LA 70123, (504) 736-6262
  - C. At the City of Kenner, Community Development Department and/or the Department of Community Services of St. Charles Parish,
  - D. Directly to members of Citizen Advisory Committees, Review Committee for the City of Kenner only.
  - E. Directly at community organization meetings and other meetings such as local civic associations or other special resident committees.
- This includes making materials available in a form accessible to persons with disabilities or of Limited English Proficiency (LEP) upon request.
- Access to records: Under § 91.105(h) for local governments the Consortium will provide residents of the community, public agencies, and other interested parties with reasonable and timely access to information and records relating to the grantee's AFH, consolidated plan, and use of assistance under the programs covered by this part during the preceding 5 years upon request.
- Technical Assistance: Under § 91.105(i), the Consortium will provide for technical assistance to groups representative of persons of low-and-moderate income that request such assistance to comment on the AFH, or in developing proposals for funding assistance under any of the programs covered by the consolidated plan, with the level and type of assistance determined by the Jefferson Parish Department of Community Development.
- Complaints: Under § 91.105(j) for local governments the Consortium will accept and respond to complaints as appropriate and practicable through voice, phone, electronic and written communications. The procedures to handle complaints from residents are related to the consolidated plan, consolidated plan amendments, the AFH, any revisions to the AFH, and the CAPER performance report, involve a timely, substantive written response to every written resident complaint, within the established period of time (15 working days, where practicable).
- Jurisdiction responsibility: The AFFH rule reference at § 91.105(1) ensures that citizen participation requirements do not restrict the responsibility or authority of the local governments for the development and execution of its Consolidated Plan or AFH.
- Additional Outreach: Sponsorship of fair housing fairs and training for residents, CHDO's and other community based organizations; and

- Additional Outreach: Participation in any annual or other HUD Consultations, Training or other events to increase public outreach and participation and identify community needs.
- Additional Outreach: The companion document, “The Jefferson HOME Consortium: Community Outreach/Engagement Marketing Strategy Plan will be made posted on the Jefferson Parish Department of Community Development website and is available upon request in hardcopy at the Joe Yenni Building, Suite 605 Main Office or by calling (504) 736-6262

## **Section IX -Access to Records**

Each member community of the Jefferson HOME Consortium will, upon request, provide residents, public agencies, and other interested parties with reasonable and timely access to information and records related to the Consolidated Plan and the Consortium's use of funds for the preceding five (5) years, while assuring client confidentiality.

## **Section X -Complaints**

- A. Residents may file written complaints related to the Consolidated Plan and annual Action Plans, and substantial amendments thereto, the Consolidated Annual Performance and Evaluation Report (CAPER), and specific aspects of any of the community planning and development programs.
- B. All written complaints should be sent to the appropriate department of the Consortium member community in which the complaint is directed.
- C. The appropriate Consortium member community shall provide a written response to every written complaint within fifteen (15) working days.
- D. All responses to complaints shall include the action(s) to be taken and the reason(s) for such action(s).

## **Section XI -Anti-Displacement & Relocation Assistance Plan**

As per the "Residential Anti-Displacement and Relocation Assistance Plan" adopted by Resolution No. 63176 on January 25, 1989, and revised by Resolution No. 76444 on March 23, 1994 and Resolution No. 86405 on February 11, 1998, the Jefferson HOME Consortium will replace all occupied and vacant habitable low and moderate income dwelling units demolished or converted to a use other than as low and moderate income housing in connection with an activity assisted with funds provided under the Housing and Community Development Act of 1974, as amended and as per 24 CFR Part 570, and funds provided under the HOME Investment Partnerships program for the Consortium as per 24 CFR Part 91.

All replacement housing will be provided within three (3) years after the commencement of the demolition or conversion. Before entering into a contract committing the Consortium to provide funds for an activity that will directly result in demolition or conversion, the Consortium will

publish a display advertisement in The Times Picayune for a minimum of publication and submit the following information to HUD:

- A. A description of the proposed assisted activity;
- B. The location on a map and the number of dwelling units by size (bedrooms) that will be demolished or converted to a use other than as low and moderate income dwelling units as a direct result of the assisted activity;
- C. A time schedule for the start and completion of the demolition or conversion;
- D. The location on a map and the number of dwelling units by size (bedrooms) that will be provided as replacement dwelling units. If such data is not available at the time of the general submission, the Consortium will identify the general location on a map and the approximate number of dwelling units by size, and provide information identifying the specific location and number of dwelling units by size as soon as it is available;
- E. The source of funding and a time schedule for the provision of the replacement dwelling units;
- F. The basis for concluding that replacement dwelling units will remain a low or moderate income dwelling unit at least 10 years from the date of initial occupancy; and
- G. Information demonstrating that any proposed replacement of dwelling units with smaller dwelling units (e.g. a 2-bedroom unit with two 1-bedroom units) is consistent with the housing needs of lower income households in the Consortium.

The Community Development Department of Jefferson Parish, acting as the lead agency for the Jefferson HOME Consortium, is responsible for tracking the replacement of housing and ensuring that it is provided within the required period, and is responsible for ensuring that the requirements are met for notification and provision of relocation assistance, as described in 570.606(c)(2), to any low income person displaced by the demolition of any dwelling unit or the conversion of a low or moderate income dwelling unit to another one in connection with an assisted activity.

Consistent with the goals and objectives of activities assisted under the Act, the Consortium will take the following steps to minimize the displacement of persons from their homes:

- A. Issue Section 8 certificates and/or vouchers to low and moderate income persons when feasible to avoid financial displacement;
- B. Implement the policy of rehabilitating all feasible units occupied by low and moderate income persons as opposed to demolition activities;
- C. Implement the policy of demolishing only vacant units that are unfeasible to rehabilitate;
- D. Provide low and moderate income persons with an opportunity to occupy an affordable standard dwelling in the same building or nearby building, either on the property or in the general neighborhood area;
- E. Implement the policy of not acquiring property from a low or moderate income owner-occupant if a mutually satisfactory sales agreement cannot be reached;
- F. Utilize housing assistance provided through the provision of a number of federally financed programs, including Section 8 (Moderate Rehab, Project Based, etc.), Section 235, Section 221 (d) (2) (3) and (4) if available, to minimize low and moderate income displacement of tenants and residents; and
- G. Relocate low and moderate income persons for temporary periods to standard units, and reimburse them for reasonable expenses incurred with the temporary move.

As per Addendum No. 1 to the Residential Anti-Displacement and Relocation Assistance Plan, it shall be the policy of the Jefferson HOME Consortium that if a demolished or converted low or moderate income dwelling unit is "Not occupied and is Vacant on Non-Occupied," it will not be subject to the replacement provision of 24 CFR 570.606(c)(1). A low or moderate income dwelling unit that is "Not Occupied and is Vacant and Non-Occupied" will be determined non replaceable if a given unit that is to be demolished or converted meets all the following criteria:

1. The unit has not been occupied for a period of 90 days or longer due to the physical condition of the property;
2. The unit is declared to be in substandard condition in accordance with the Housing Quality Standards of 24 CFR 982.401 and local Jefferson Parish Code requirements; and
3. The estimated cost of rehabilitation to fully meet Housing Quality Standards and Jefferson Parish code requirements exceed the estimated value of new replacement housing construction by 80 percent or greater.

Any low or moderate income dwelling unit found to comply with the above "Not Occupied and Vacant Non-Occupied" definition will not require replacement if it is demolished or converted to a use other than as low or moderate income housing.

## **Section XII -Amendments to the Consolidated and Action Plans**

Residents shall be provided an opportunity to participate in any amendment to the Consolidated Plan and/or annual Action Plan to include a 30 day comment period.

- A. Definition of Amendment: The Consolidated Plan and/or annual Action Plan shall be amended under any one of the following circumstances :
1. There is a change in allocation priorities or a change in the method of distribution of funds. The current procedure is to solicit and review proposals, and to submit all proposals which meet program requirements to the administration and parish council for review. The parish council and administration make the final decision on which proposed projects and activities are included in the Action Plan, as long as they are consistent with the priorities in the Consolidated Plan. Therefore, any proposed change in these general procedures for selecting and funding proposals will be subject to the amendment process.
  2. There is a decision to delete an activity, or carry out a new activity, using funds from any program covered by the Consolidated Plan (including program income), and not previously described in the annual Action Plan.
  3. There is a substantial change in the purpose, scope, location or beneficiaries of an activity. A substantial change in the purpose or scope of an activity is defined as one which changes the nature of the proposed activity from one permitted use to another permitted use. A substantial change in the location or beneficiaries of an activity is defined as a change in more than 50% of the originally targeted beneficiaries.

4. There is a substantial change in the budget of a project or activity. This is defined as follows: a 50% or greater increase/decrease in cost for projects and activities budgeted at between \$50,000 and \$100,000, and a 30% or greater increase/decrease in cost for projects and activities budgeted at more than \$100,000. Changes to activities budgeted at less than \$50,000 are not substantial changes unless cancelled fully or newly added.

Each of the above circumstances or criteria will trigger a substantial amendment that is subject to the resident notification process including a 30 day comment period, public meeting and Jefferson Parish Council Resolution approving the amendment as set forth in this plan.

- B. In order to provide residents with reasonable notice and opportunity to comment on any proposed substantial amendments to the Consolidated Plan and/or annual Action Plan, the Consortium shall:

1. Publish in the newspaper and/or Jefferson Parish website or other appropriate media as per HUD requirements, a notice regarding the proposed modifications, amendments, or changes to the annual Action Plan to afford a 30-day opportunity to review said changes, and to solicit comments thereon and to include a public hearing on the matter
2. Where possible conduct a public hearing before the scheduled date for action and/or at the regularly scheduled meeting of the governmental council where this resolution authorizing the modification, amendment or change to the Consolidated Plan or annual Action Plan is considered. Any public comments accepted after the date of the Jefferson Parish Council Resolution approving the amendments to the Action Plan or other activities that are deemed substantial will result in subsequent Jefferson Parish Council action through new Resolution.
3. All resident and other comments from other entities shall be considered by the member community and the proposed changes may be modified as appropriate as a result of these comments. A summary of these comments or views and a summary of any comments or views not accepted and the reasons why, shall be attached to the substantial amendment and to the revised AFH.

### **Section XIII -Amendments to the Assessment of Fair Housing (AFH)**

Under § 91.1 05( c)( 1) for jurisdictions the criteria for revisions to the AFH are found in this section. The Jefferson HOME Consortium will use the following criteria for determining when revisions to the AFH will be required:

- A. Situations described in 24 CFR 5.164, which include a material change in circumstances in the jurisdiction that affects the information on which the AFH is based, to the extent that the analysis ,the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances.

Under§ 91.105(c)(2) and§ 91.115(c)(2), the Jefferson HOME Consortium will provide community residents with reasonable notice and an opportunity to comment on substantial amendments to the AFH and revisions to the AFH and as such will:

- A. Publish in the newspaper and/or Jefferson Parish website or other appropriate media as per HUD requirements, a notice regarding the proposed modifications, amendments, or changes to the AFH to afford a 30-day opportunity to review said changes, and to solicit comments thereon and to include a public hearing on the matter
- B. In addition to obtaining residents' views through the required public hearing addressing housing and community development needs, development of proposed activities, and review of program performance, as per § 91.105(e) for local governments, the proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH, at least one of the public hearings will be held before the proposed consolidated plan is published for comment.
- C. In order to obtain the views of the community on AFH-related data and affirmatively furthering fair housing in the Consortium's housing and community development programs, under§ 91.105(1 )(iii) for local governments, at least one public hearing will be held before the proposed AFH is published for comment,
- D. The Jefferson HOME Consortium will consider all comments and views of residents received in writing or orally at public hearings in regard to the AFH or a substantial amendment to the AFH, as applicable.
- E. All resident and other comments from other entities shall be considered by the member community and the proposed changes may be modified as appropriate as a result of the accepted comments. A summary of these comments or views and a summary of any comments or views not accepted and the reasons why, shall be attached to the substantial amendment and to the revised AFH.

#### **Section XIV -Amendments to Citizen Participation Plan**

Residents shall be involved in the development of this Citizen Participation Plan or any substantial amendment thereto, which involves altering the concepts herein described. A draft of the plan, or any revision thereof, can be reviewed by concerned residents. All comments and views will be considered prior to revision of the plan. The Consortium reserves the right to amend this Plan to conform to current Federal Regulations as applicable and as necessary during the development of the Consolidated and Annual Plans and for other matters.

#### **Section XV- Jurisdiction Responsibility**

No requirements in this plan shall be construed to restrict the responsibility or authority of the member communities of the Consortium for the development and execution of these community planning and development programs.