

## **Attachment A**

June 22, 2021 - Citizen Participation Plan (CPP) substantial amendments proposed herein for public comment and review **are all noted in red text** throughout.

Changes noted are to correct grammatical errors or to further clarify a provision.

Reference to Travis County's Language Access Plan for LEP clients, was also added to the plan.

Please note, the primary reason for this substantial amendment is to revise Section C.7 – Action Plan Substantial Amendments section of the Citizen Participation Plan. Please see the proposed amendments on page 15.

# Travis County Citizen Participation Plan

## I. Background/References

This Citizen Participation Plan is subject to the requirements of the following Federal Regulation:

Title 24: Housing and Urban Development Code of Federal Regulations  
Part 91. Consolidated Submissions for community Planning and Development Programs

## II. General Provisions

### A. Purpose

The purpose of this plan is to outline the method by which Travis County Health and Human Services (TCHHS) will encourage public participation in the planning and implementation of its U.S. Department of Housing and Urban Development (HUD)-funded Community Development Block Grant (CDBG) program. Travis County is required to prepare and submit a Consolidated Plan every three, five or six years, Action Plans on an annual basis and an Assessment of Fair Housing. The consolidated planning process requires that each jurisdiction adopt a citizen participation plan.

Travis County's Citizen Participation Plan (CPP) outlines the notification procedures by which residents, public agencies, and other interested parties will be notified of public hearings and the opportunities available for the public to comment on community needs, planned use of funds, and performance of all CDBG funded projects. In addition, the plan outlines how Travis County will ensure accessibility of all meeting notices, public hearings, and posted documents for public review to all segments of the population, including people with unique needs, language barriers, or limited ability.

The CPP applies to the following areas of planning for the use of affordable housing, and community and economic development made possible through CDBG funding:

1. The Citizen Participation Plan, itself,
2. The Consolidated Plan (ConPlan),
3. The Annual Action Plan,
4. The Consolidated Annual Performance and Evaluation Report (CAPER),
5. The Assessment of Fair Housing (AFH), and
6. Disaster Response and Recovery Funds.

## **B. Jurisdiction**

The Travis County CDBG service area includes the unincorporated areas of the County and incorporated areas that choose to participate in the jurisdiction through the Urban County renewal process. As such, community development and housing opportunities in geographic areas in the unincorporated areas and participating incorporated areas will be considered. The Urban County renewal process occurs every three years and is confirmed annually.

## **C. Lead Agency**

Travis County's lead agency for administering CDBG funds is the Health and Human Services Department. As the lead agency, TCHHS is responsible for developing the Citizen Participation Plan, the Assessment of Fair Housing, Consolidated Plan, Annual Action Plans, and the Consolidated Annual Performance and Evaluation Report (CAPER).

## **D. Contact**

The following contact information can be used to:

1. Request accommodations for meetings or access to information;
2. Request information and standard documents; **or**
3. Provide public comments on CDBG planning documents.

**Telephone:** 512.854.3460

**Email:** [cdbg@traviscountytx.gov](mailto:cdbg@traviscountytx.gov)

**Mail:** Travis County Health and Human Services  
CDBG Program  
P.O. Box 1748  
Austin, TX 78767

**Website:** [www.traviscountytx.gov/health-human-services/cdbg](http://www.traviscountytx.gov/health-human-services/cdbg)

## **III. General Policies and Procedures**

### **A. Accessibility**

Reasonable accommodations for people with disabilities and **Limited English Proficient (LEP)** populations **consistent with HUD regulations and Travis County's Language Access Plan (LAP)**, will be made. Meetings will be made accessible by choosing locations that are ADA compliant, when available. Residents may contact the CDBG office five business days prior to a meeting date to request an American Sign Language or Spanish interpreter be present at any public meeting (for contact information see Section II: D, above.)

Meeting notices and presentation materials will be provided in English and Spanish. In addition, Census data will be analyzed to identify areas where non-English speakers reside. If more than 20% of the County's population speaks a language, notices and some materials will be translated into that language. If more than 1,000 people within the county speak a language other than English reasonable accommodations will be made with possible accommodations including but not limited to, interpreters, upon request, at public hearings and meeting notices.

Meeting notices will include contact information for TTY or the Texas State Relay number for those who are hearing impaired.

## **B. Access to Information Standard Documents**

Standard documents and information regarding use of funds will be provided to residents, public agencies, and other interested parties, through various media formats (written, internet, etc.) including those most affected by proposed projects. Opportunities to receive information, review standard documents, and submit comments will be provided with reasonable notice and time allowed, **and as required by applicable regulations**. The information will be retained and available for public review for no less than five years after approval by Travis County Commissioners Court.

Standard documents, including the Plan to Minimize Displacement, the Assessments of Fair Housing, annual Fair Housing Reports, Consolidated Plans, annual Action Plans, and the annual Evaluation Reports, will be located on the County's website. To review any standard document in print format, please contact the CDBG Office as outlined in Section II, D.

Throughout the CPP, Travis County Commissioners Court is mentioned as a source of information. Travis County Commissioners Court is streamed live with closed captioning through the County website and the County's public access TV channel. The recorded meeting can be viewed after the meeting date online or replayed throughout the week on the TV channel. Contact information for the program is routinely provided during the Commissioners Court meetings. The Travis County Commissioners Court agenda is posted via the Travis County website prior to each voting session in accordance with applicable laws. The County website is located at [www.traviscountytexas.gov](http://www.traviscountytexas.gov).

### C. Public Notice

Travis County HHS will post notices of public hearings and community meetings, including times, dates, and locations, at least fourteen (14) days prior to the date of the hearing or meeting. Notices may be posted in any of the following ways: Newspapers of general circulation, Travis County Community Centers, social service agencies that target low- to moderate- income residents, Travis County website, social media, public access TV station, radio, direct mail outs through U.S. postal service, direct emails to resident and provider mailing lists, and posting to listservs.

In the event of a declared disaster that requires expedited procedures to draft, propose, or amend consolidated plans, Travis County HHS will post notices of public hearings and community meetings, including times, dates, and locations with reasonable notice in advance, **and as required by applicable regulations.**

In response to COVID-19, effective April 9, 2020, Travis County requested the use of the following HUD waivers:

- *Citizen Participation Public Comment Period for Consolidated Plan Amendment*, which waives 24 CFR 91.105(c)(2) and (k), in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG funds. The 30-day minimum for the required public comment period is waived for substantial amendments, provided that no less than 5 days are provided for public comments on each substantial amendment. The waiver is available through the end of Travis County's 2020 program year. Any recipient wishing to undertake further amendments to prior year plans following the 2020 program year can do so during the development of its FY 2021 Annual Action Plan.
- *Citizen Participation Reasonable Notice and Opportunity to Comment*, which waives 24 CFR 91.105 (for local governments) that sets forth the citizen participation plan requirements for recipients. For substantial amendments to the consolidated plan, the regulations require the recipient to follow its citizen participation plan to provide citizens with reasonable notice and opportunity to comment. The citizen participation plan must state how reasonable notice and opportunity to comment will be given. Therefore, Travis County establishes reasonable notice and opportunity to comment in response to COVID-19 will be at least five (5) days prior to the date of the hearing or meeting. This waiver is effective through the end of the 2020 program year.

#### **D. Technical Assistance**

Technical assistance will be made available by appropriate Travis County staff to assist low- and moderate-income representative groups or agencies that request such assistance in developing proposals for funding assistance under this consolidated plan and to provide comments for the AFH.

Appropriate staff will be assigned based on expertise required for the specific proposal. The TCHHS County Executive determines the level and types of assistance to be provided at any time based on a number of considerations including, but not limited to, space, expense, and staff workloads.

#### **E. Response to Complaints**

All complaints must be in writing. If a person is unable to provide the complaint in writing for any reason, assistance may be provided. Complaints need to include the resident's name, address, and daytime telephone number, if applicable, in case TCHHS staff need to clarify the nature of the complaint.

All written complaints will receive a timely written response mailed within fifteen (15) working days of receipt of it. If CDBG Staff is unable to be compliant with the fifteen (15) working day period, the complainant will be notified of an approximate date a response will be provided.

It is up to the discretion of the Travis County Health and Human Services Department to determine if a public hearing regarding an issue is needed. If a public hearing is needed, appropriate notice and location(s) of the hearing will be made, depending upon the implications of the issue.

#### **Complaints or Grievances should be sent to:**

Travis County Health and Human Services  
CDBG Program  
P.O. Box 1748  
Austin, TX 78767

#### **F. Plan to Minimize Displacement**

A summary of the County's Plan to minimize displacement of persons as a result of the County's proposed activities, and any activities likely to result in displacement, will be posted. This Plan will describe how Travis County will compensate people who are actually displaced as a result of the use of these funds, specifying the type and amount of compensation. A summary of Plan to Minimize Displacement can be found in Appendix A.

## IV. Participation Opportunities

Community engagement and participation is an essential goal of the CDBG program, and the residents of Travis County are essential to the development of planning documents and activities. Travis County encourages community participation in the development of its Citizen Participation Plan (CPP), Consolidated Plan (**ConPlan**), Annual Action Plans, Consolidated Annual Performance Evaluation Report (CAPER), Assessment of Fair Housing (AFH), and any disaster response or recovery funds, particularly in low- to moderate- income target areas. The following section outlines the various ways in **which** the community may participate in planning activities for the CDBG program and provide input on planning and reporting documents.

### A. Citizen Participation Plan

Travis County's Citizen Participation Plan (CPP) outlines the notification procedures by which residents, public agencies, and other interested parties will be notified of public hearings and the opportunities available for public to comment on community needs, planned use of funds, and performance of all CDBG funded projects.

#### 1. *Public Comment*

Travis County HHS will draft the Citizen Participation Plan (CPP) and present it to the Travis County Commissioners Court during a regularly scheduled voting session. After presentation to Travis County Commissioners Court, the CPP will be posted for written comment for one (1) week prior to approval by the Travis County Commissioners Court.

Comments on the CPP may be received via phone and email to the Travis County Health and Human Services CDBG staff (see Section II: D, above). The CPP will be posted on the Travis County website and copies will be located at **all** the Travis County Community Centers for public review.

#### 2. *Amendments*

Once approved by the Travis County Commissioners Court, any changes to the Citizen Participation Plan must go through a **fifteen (15) day public comment period** after the draft presentation to the Travis County Commissioners Court. Written comments may be submitted to CDBG staff via email or mail (see Section II: D, above). No public hearing is required.

Travis County will document and report all public comments from citizens, public agencies, and other interested parties in preparing its final submission.

Public comments will be considered when feasible and beneficial, preceding final approval of Travis County Commissioners Court.

## **B. Consolidated Plan (ConPlan)**

The Consolidated Plan presents a coordinated approach for addressing Travis County's housing and community development needs over a five-year period. A new Consolidated Plan is prepared every five years. It combines, in one report, important information about Travis County demographics, as well as information on the housing and other community development needs of its residents.

### 1. Public Hearings

Public Hearings are held at two different times during the development of the Consolidated Plan. All hearings will include an overview of the amount of funds expected from CDBG, the purpose and intent of CDBG dollars, and eligible activities. Public Hearings will be held at Travis County Commissioners Court during the normally scheduled voting session. Hearings will be held in the traditional public hearing format with oral testimony. In the event that national, state, and/or local health authorities recommend social distancing and limiting public gatherings for public health reasons, the public hearing may be held in a virtual format. Travis County virtual hearings will provide reasonable notification and access for citizens in accordance with the Citizen Participation Plan, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

- a. One (1) public hearing will be held to inform the Needs Assessment of the Consolidated Plan, and participants can provide input regarding their housing, community development, and public service needs.
- b. One (1) public hearings will be held during the Public Comment period for the Consolidated Plan to inform and enable the community to comment on the proposed uses of CDBG funds.

### 2. Community Meetings

In order to gather information more effectively on community needs from the residents of the CDBG service area, CDBG staff will **actively work to engage in community meetings with residents and neighborhood groups, virtually. Contingent upon social distancing requirements or other safety protocol, CDBG staff may accommodate in-person meeting requests.** Staff will identify groups that serve protected classes, with reference to geography and any other HUD requirements for program participation as guidance is received from HUD. Staff will work with these groups to convene or attend scheduled meetings in order

to provide information about the CDBG grant and gather information on community needs.

In the event that national, state, and/or local health authorities recommend social distancing and limiting public gatherings for public health reasons, CDBG staff will make reasonable efforts to gather information on community needs from the residents of the CDBG service area by participating in phone or virtual meetings. Any information gathered in the twelve months prior to March 31<sup>st</sup> of the calendar year in which the plan is due will be used for Consolidated Plan development.

### 3. Consultations

In the development of the Consolidated Plan, consultations with other public and private agencies will occur including, but not limited to, the following:

- Local public housing authorities;
- Other assisted housing providers;
- Social service providers including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDs and their families, and homeless persons;
- Community-based and regionally-based organizations that represent members of protected classes;
- Organizations that enforce fair housing laws and other public and private fair housing service agencies;
- Broadband Internet Service Providers and organizations engaged in narrowing the digital divide;
- Agencies whose primary responsibilities include management of flood prone areas, public land or water resources and emergency agencies;
- The Continuum of Care that serves Travis County;
- Public and private agencies that address housing, health, social service, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families, including veterans, youth, and/or other persons with special needs;
- Publicly funded institutions and systems of care that may discharge persons into homelessness; and
- Business and civic leaders.

A variety of mechanisms may be utilized to solicit input from these entities. These could include but are not limited to staff participation on coalitions or boards, telephone or personal interviews, mail surveys, internet-based

feedback, and surveys, focus groups, **virtual meetings**, and/or consultation workshops.

4. Surveys and Participation Forms

For the development of the Consolidated Plan, residents, social service providers and community groups may complete a survey that assesses perceptions of community needs. Surveys will be available throughout the year, via links on the CDBG website and annually will be distributed electronically to residents that have requested information on the program and public agencies that serve residents in the CDBG service area.

Participation Forms that collect information on residents' perceptions of community needs may be used to collect data at community meetings. In addition, copies of the participation form will be available in the Travis County Community Centers to increase resident participation in the information gathering process. Surveys will be available in both English and Spanish. For other accommodations, contact the CDBG office (see Section II: D, above.) Any data collected in the twelve months prior to March 31st of the calendar year in which the plan is due will be used for development of the Consolidated Plan.

5. Public Comment

Travis County HHS will draft the Consolidated Plan and present it to the Travis County Commissioners Court during a regularly scheduled voting session. After presentation to Travis County Commissioners Court, the Plan will be **posted for written comment for thirty (30) days** prior to approval by the Travis County Commissioners Court. Comments on the Plan may be received in writing via email or regular mail to the Travis County Health and Human Services CDBG staff (see Section II: D, above.)

The Plan will be posted on the Travis County website and copies will be available at **all** the Travis County Community Centers for public review. Notification of availability of the draft will appear in newspaper(s) of general circulation.

Travis County will document and report all public comments from residents, public agencies, and other interested parties in preparing its final submissions. A concise summary of the community participation process, public comments received in writing or orally at public hearings and responses to those comments will be included in the final draft of the Consolidated Plan.

## 6. Substantial Amendments

A substantial amendment to the Consolidated Plan will occur when an unforeseen need arises during the ConPlan period which influences the strategic plan and the investment of resources.

The amendment process shall include:

- a. Public notice,
- b. A **thirty (30) day public comment period**, and
- c. One (1) public hearing at Travis County Commissioners Court during the public comment period.

Amendments to the Consolidated Plan may take place at any time during the program year.

Travis County will document and report all public comments from citizens, public agencies, and other interested parties in preparing its final submissions. Public comments will be considered when feasible and beneficial, preceding final approval of Travis County Commissioners Court.

## C. **Annual Action Plan**

Each year the County must prepare an annual Action Plan that outlines the amount of CDBG funding available for the program year (October 1-September 31), and the proposed uses of the funds to achieve the goals outlined in the Consolidated Plan. This annual plan, prepared with public review and comment, must be submitted to HUD annually, no later than August 15.

### 1. Public Hearings

Public Hearings are held at two different times during the development of the Annual Action Plan. All hearings will include an overview of the amount of funds expected from CDBG, the purpose and intent of CDBG dollars, and eligible activities. In the year that the Consolidated Plan is developed, the public hearings for input on the Annual Action Plan and Consolidated Plan will be held at the same time. Public Hearings will be held at Travis County Commissioners Court during the normally scheduled voting session. Hearings will be held in the traditional public hearing format with oral testimony. In the event that national, state, and/or local health authorities recommend social distancing and limiting public gatherings for public health reasons, the public hearing may be held in a virtual format. Travis County virtual hearings will provide reasonable notification and access for citizens in accordance with the Citizen Participation

Plan, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

- a. One (1) public hearing will be held to inform the Needs Assessment of the Action Plan, and participants can provide input regarding their housing, community development, and public service needs.
- b. One (1) public hearing will be held during the Public Comment period for the Action Plan to inform and enable the community to comment on the proposed uses of CDBG funds.

## 2. Community Meetings

In order to gather information more effectively on community needs from the residents of the CDBG service area, CDBG staff will **actively work to engage in community meetings with residents and neighborhood groups, virtually. Contingent upon social distancing requirements or other safety protocol, CDBG staff may accommodate in-person meeting requests.** Staff will identify groups that serve protected classes, with reference to geography and any other HUD requirements for program participation as guidance is received from HUD. Staff will work with these groups to convene or attend scheduled meetings in order to provide information about the CDBG grant and gather information on community needs.

In the event that national, state, and/or local health authorities recommend social distancing and limiting public gatherings for public health reasons, CDBG staff will make reasonable efforts to gather information on community needs from the residents of the CDBG service area by participating in phone or virtual meetings.

For Action Plans submitted after January 1, 2019, any information collected in the twelve months prior to March 31<sup>st</sup> of the calendar year in which the plan is due will be used for development of the Action Plan.

## 3. Surveys and Participation Forms

For the development of the Action Plan, residents, social service providers and community groups may complete a survey that assesses perceptions of community needs. Surveys will be available throughout the year, via links on the CDBG website and annually will be distributed electronically to residents that have requested information on the program and public agencies that serve residents in the CDBG service area.

Participation Forms that collect information on residents' perceptions of community needs may be used to collect data at community meetings. In addition, copies of the participation form will be available in the Travis County Community Centers to increase resident participation in the information gathering process. Surveys will be available in both English and Spanish. For other accommodations, contact the CDBG office (see Section II: D, above.)

For Action Plans submitted after January 1, 2019, any data collected in the twelve months prior to March 31<sup>st</sup> of the calendar year in which the plan is due will be used for development of the Action Plan.

#### 4. Consultations

In the development of the Annual Action Plan, consultations with other public and private agencies will occur including, but not limited to, the following:

- Local public housing authorities;
- Other assisted housing providers;
- Social service providers including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDs and their families, and homeless persons;
- Community-based and regionally-based organizations that represent members of protected classes;
- Organizations that enforce fair housing laws and other public and private fair housing service agencies;
- The Continuum of Care that serves Travis County;
- Public and private agencies that address housing, health, social service, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families, including veterans, youth, and/or other persons with special needs;
- Publicly funded institutions and systems of care that may discharge persons into homelessness; and
- Business and civic leaders.

Commencing with Annual Action Plans submitted after January 1, 2019 consultations will also include:

- Broadband Internet Service Providers and organizations engaged in narrowing the digital divide; and
- Agencies whose primary responsibilities include management of flood prone areas, public land or water resources and emergency agencies.

A variety of mechanisms may be utilized to solicit input from these entities. These could include but are not limited to staff participation in coalitions or boards, telephone or personal interviews, mail surveys, internet-based feedback, and surveys, focus groups, **virtual meetings**, and/or consultation workshops.

5. Public Comment

Travis County HHS staff will draft the Annual Action Plan and present it to the Travis County Commissioners Court during a regularly scheduled voting session. After presentation to Travis County Commissioners Court, the Action Plan will be **posted for written comment for thirty (30) days** prior to approval by the Travis County Commissioners Court.

Comments on the Action Plan may be received in writing via email or regular mail to the Travis County Health and Human Services CDBG staff. The Plan will be posted on the Travis County website and copies will be available at **all** the Travis County Community Centers for public review.

Travis County will document and report all public comments from residents, public agencies, and other interested parties in preparing its final submissions. A concise summary of the community participation process, public comments received in writing or orally at public hearings and responses to those comments will be included in the final draft of the Action Plan.

6. Use of Alternate Projects

Travis County will include a list of alternate projects for public review each year in the Annual Action Plan. If a funded project has cost savings, slows down, or discovers a barrier to completing it, an alternate project from the relevant Annual Action Plan may be selected to continue the timely spending of grant funds.

Alternate Projects will contain the same level of information that funded projects contain in the Annual Action Plan to ensure appropriate review by the public. Approval by the Travis County Commissioners Court will be necessary to replace a funded project with an alternate or to fund an alternate with cost savings from a completed project regardless of whether or not the increase or decrease exceeds 25%. These actions will not require a substantial amendment since the alternate projects will have gone through a public review process.

## 7. Substantial Amendments

When the location or beneficiaries of a project proposed under the Action Plan are changed, **the CDBG service area is changed**, the scope of the project is increased or reduced by more than 25%, or a new project is funded that was not originally subject to public review, Travis County HHS shall **substantially** amend its plan.

Use of an alternate project by the process defined in Section III.C.6 of this plan, will not require a Substantial Amendment. Approval by the Travis County Commissioners Court will be necessary to replace a funded project with an alternate or to fund an alternate with cost savings from a completed project regardless of whether or not the increase or decrease exceeds 25%.

If, upon the completion of a project, there are cost savings not exceeding \$24,999, Travis County may reallocate the cost savings for the same project type, in a future annual Action Plan, without substantially amending the impacted Action Plan. The following actions shall be required to reallocate cost savings up to \$24,999:

- Reallocated funds shall be clearly documented in the future annual Action Plan within which funds are reprogrammed/reallocated. The Action Plan shall include a full description of the program and the amount of funds that were not expended, and which are being reprogrammed for a new purpose, and the original program year for the funds.
  - *For example:* PY20 Project A's budget was \$30,000. Only \$17,000 was spent. \$13,000 can be reprogrammed without a substantial amendment. The reallocation of the remaining \$13,000 must clearly state in the future Action Plan, "PY22 Project B, will be funded partially or fully with \$13,000 in cost savings from PY20 Project A."
- The Action Plan must specify the intended use of the reallocated funds.
- The reallocation proposal must be tied to the delivery of priorities outlined in the applicable Travis County five-year ConPlan.

Because the reallocation of cost savings will be included in the annual action planning process, the public will have a reasonable opportunity to provide feedback on the reallocation proposal, during the annual 30-day Action Plan public comment period.

The reallocation of funds more than \$24,999 is subject to a substantial amendment, unless remaining cost savings are connected to a perpetual project, which would allow existing unspent funds to be spent first, prior to expending current year program funds.

If a project which is replaced by an alternate is deleted permanently, a substantial amendment will be completed in the summer during the next Annual Action Plan process to allow for public comment on the deletion of the project. Consideration of any project that was not identified as an alternate will go through the normal substantial amendment process.

The amendment process shall include:

- a. Public notice,
- b. **A thirty (30) day public comment period**, and
- c. One (1) public hearing at Travis County Commissioners Court during the public comment period.

As necessary, such notice may also include a public hearing in the precinct in which the project has been changed or added. Amendments to the Action Plan may take place at any time during the program year.

Travis County will document and report all public comments from citizens, public agencies, and other interested parties in preparing its final submissions. Public comments will be considered when feasible and beneficial, preceding final approval of Travis County Commissioners Court.

#### **D. Consolidated Annual Performance Evaluation Report (CAPER)**

At the end of each fiscal year, the County must also prepare a Consolidated Annual Performance Evaluation Report (CAPER) to provide information to HUD and the public to evaluate the County's performance and to determine whether the activities undertaken during the program year helped to meet the County's goals to address priority needs identified in the Consolidated Plan and the Annual Action Plan. This annual performance report, prepared with public review and comment, must be submitted to HUD annually, no later than December 31.

##### *1. Public Hearing*

After the development of the CAPER for public comment, a public hearing will be held to receive oral comment on Travis County's performance. During the **fifteen (15) day review period**, one (1) public hearing will be held at the Travis County Commissioners Court during the normally scheduled voting session. The public hearing will be held in the traditional public hearing format with oral testimony. In the event that national, state, and/or local health authorities recommend social distancing and limiting public gatherings for public health reasons, the public hearing may be held in a virtual format. Travis County virtual

hearings will provide reasonable notification and access for citizens in accordance with the Citizen Participation Plan, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

2. Public Comment

Travis County will draft the CAPER and present it to the Travis County Commissioners Court during a regularly scheduled voting session. After presentation to Travis County Commissioners Court, the CAPER will **be posted for written comment for fifteen (15) days** prior to approval by the Travis County Commissioners Court.

Comments on the CAPER may be received in writing via email or regular mail to the Travis County Health and Human Services CDBG staff. The CAPER will be posted on the Travis County website and will be available at **all** the Travis County Community Centers for public review.

Travis County will document and report all public comments from residents, public agencies, and other interested parties in preparing its final submissions. A concise summary of the community participation process, public comments received in writing or orally at public hearings and responses to those comments will be included in the final draft of the CAPER.

Public comments will be considered when feasible and beneficial, preceding final approval by the Travis County Commissioners Court.

**E. Assessment of Fair Housing (AFH)**

As an entitlement county receiving CDBG funds from HUD, Travis County must fulfill its fair housing responsibilities by developing an Assessment of Fair Housing (AFH) and by taking actions to overcome the effects identified in the AFH through the implementation of a Fair Housing Plan (FHP). The County must ensure the AFH is informed by meaningful community participation.

1. Public Hearings

During the development of the AFH, at least one (1) public hearing will be held to solicit views and recommendations from residents and other interested parties on factors contributing to fair housing and other related issues.

2. Public Comment

The draft AFH and a summary document that describes the purpose and content of the AFH will be posted for thirty (30) days to receive comments from

residents and other interested parties, prior to approval by the Travis County Commissioners Court.

The draft AFH and summary, including any proposed analysis, HUD-provided data, and any other included data, will be posted on the Travis County website and will be available at Travis County Community Centers for public review. All comments and views received during the public comment period, whether received in writing or orally at public hearings, will be considered in preparation of the final AFH.

The final AFH will include:

- a. A concise summary of the community participation process, public comments, and efforts made to broaden participation in the development of the AFH;
- b. A summary of the comments, views, and recommendations, received in writing, or orally at public hearings, during the community participation process, and
- c. A summary of any comments, views, and recommendations not accepted by the County and the reasons for non-acceptance.

### 3. Consultations

In the development of the AFH, consultations with other public and private agencies will occur including, but not limited to, the following:

- Local public housing authorities;
- Other assisted housing providers;
- Social service providers including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDs and their families, and homeless persons;
- Community-based and regionally-based organizations that represent members of protected classes ;
- Organizations that enforce fair housing laws and other public and private fair housing service agencies; and
- Regional government agencies involved in region-wide planning and transportation responsibilities.

A variety of mechanisms may be utilized to solicit input from these entities. These could include but are not limited to telephone or personal interviews, mail surveys, internet-based feedback, and surveys, focus groups, **virtual meetings**, and/or consultation workshops.

#### 4. *Revisions*

A HUD-accepted AFH must be revised and submitted to HUD for review when either of the following situations occurs:

- a. A material change occurs. A material change is one that both;
  - i. impacts the circumstances in the jurisdiction which may include natural disasters, significant demographic changes, new significant contributing factors, and civil rights findings and
  - ii. causes alterations to the AFH 's analyses, contributing factors, priorities, and/or goals.
- b. The County receives a written notification from HUD specifying a material change.

The revision process shall include:

- a. Public notice,
- b. A public comment for a period of thirty (30) days before submission to HUD, and
- c. One (1) public hearing at Travis County Commissioners Court during the public comment period.

A revision to the Assessment of Fair Housing will not be implemented until the conclusion of the 30-day public comment period. A summary of all comments or views received in writing, or orally, during the comment period, will be attached to the revision upon submission to HUD.

#### **F. Disaster Response and Recovery Funds**

In the event of a declared county-wide, state-wide or national emergency (as proclaimed by the County Judge, Governor, or President of the United States), it may be necessary for Travis County to apply for new emergency grant funding, such as CDBG-Disaster Response or Recovery grants, or any other grants issued to jurisdictions in the event of a disaster that requires an urgent response to address the needs of the community.

#### **HUD Waiver Process**

Upon determination of good cause, HUD has the authority to waive certain regulatory provisions of the CDBG program subject to statutory limits. The County reserves the right to submit waiver notifications to HUD when expedited disaster-related assistance is offered. Following completion of a waiver process as determined by HUD, the County may implement actions as prescribed by the approved waiver determinations authorized by HUD.

**Implementing HUD Waivers on Amendments or Substantial Amendments.**

In order to expedite the distribution of emergency funding during a disaster response situation, Travis County may determine it is necessary to waive certain amendment or substantial amendment provisions described in Sections IV.A.2, IV.B.6, and/or IV.C.7. Any such waiver is subject to the requirements of the respective emergency funding appropriation.

In the event of a disaster that requires a response to address local urgent needs, the County will:

1. Notify HUD at least five (5) days before implementing changes or amendments to the Consolidated Plan and/or Action Plan; and
2. Make reasonable efforts to provide the public opportunity to comment on changes and amendments to the Consolidated Plan, Action Plan, and/or Citizen Participation Plan.

**V. Effective Date**

Upon approval of Travis County Commissioners Court, the Citizen Participation Plan, as amended, is effective as of **August 10, 2021**.