



# CDBG-DR Citizen Participation Plan

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Community Development Block Grant-Disaster Recovery  
City of Philadelphia  
July 2023

## Version History

Version	Date	Notes
1.0	7/1/2023	Publication of Version 1.0 of the CDBG-DR Citizen Participation Plan

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## **SECTION 1. CITIZEN PARTICIPATION PLAN**

### **1.1 Introduction**

The primary goal of the City of Philadelphia Community Development Block Grant – Disaster Recovery (CDBG-DR) Citizen Participation Plan is to provide all Philadelphia citizens with an opportunity to participate in the planning, implementation, and assessment of the City's CDBG-DR program. The plan sets forth policies and procedures for citizen participation that are designed to maximize the opportunities for citizen involvement in the community development process. The City will provide all citizens in CDBG-DR-targeted communities with the opportunity to participate, with a particular emphasis on including low- and moderate-income individuals and ensuring access by non-English-speaking persons or those requiring special accommodations due to disabilities.

The City has developed a specific citizen participation plan to meet the requirements of the CDBG-DR funding for Hurricane Ida and comply with the requirements outlined in 24 CFR 91.105. The plan reflects the alternative requirements as specified by the U.S. Department of Housing and Urban Development (HUD) in the Federal Register (Federal Register Notice (Vol. 87, No. 100, 5/24/2022, 87 FR 31636 and Vol. 88, No. 11, 01/18/2023, 88 FR 2198) and notice of specific waivers. The City's CDBG-DR Citizen Participation Plan will be placed on the official website of the City of Philadelphia at: <https://www.phila.gov/departments/office-of-the-director-of-finance/hurricane-ida-recovery-funding/>.

The City has outlined targeted actions to facilitate citizen participation requirements and maximize citizen interaction in developing Philadelphia's Disaster Recovery Action Plan for Hurricane Ida and amendments to the Action Plans. These actions are designed to encourage participation and allow equal access to information about programs by all citizens, especially low- and moderate-income individuals; those living in areas where CDBG-DR funds are proposed to be used; and non-English-speaking persons, minorities, and individuals with disabilities. The City also encourages the participation of citywide and regional institutions and other organizations (including businesses, developers, and community and faith-based organizations) that are involved with or affected by the programs or activities covered by the Action Plan.

### **1.2 Public Notices and Comment Period**

The City's Citizen Participation Plan will ensure that there is reasonable and timely access for public notice, appraisal, examination, and comment on the activities proposed for the use of CDBG-DR grant funds. The State has and will continue to coordinate outreach meetings with public entities, nonprofits, private sector and involved associations, and other stakeholders. The City will also invite public comment to the City's Disaster Recovery Action Plan and substantial amendments for a minimum of 30 days, posted prominently and accessible on the City's official website.

Per the Federal Register’s approach for CDBG-DR, at least one public hearing is required during the 30-day comment period for the Action Plan. The process below will be followed for a public hearing.

All public hearings will be held at a time and accessible location convenient to potential and actual beneficiaries, with accommodations for persons with disabilities or limited English proficiency (LEP). Public hearings may also be hosted virtually. If the public hearing is held virtually, the City will allow questions in real time, with answers coming directly from the grantee representative to all attendees. The City will make every effort to promote public hearings at least five to ten business days prior to the hearing.

### 1.2.1 Philadelphia Hurricane Ida Disaster Recovery Action Plan

The City will prominently post a notice and the proposed Philadelphia Hurricane Ida Disaster Recovery Action Plan (“Action Plan”) on the City’s official website. The Action Plan includes the following:

1. The amount of assistance expected to be received, based on projected amounts provided by HUD.
2. The range of activities that can be undertaken, including the estimated amount that will benefit persons with low and moderate incomes.
3. Plans to minimize displacement of persons and assist any displaced persons.
4. An anticipated time schedule for submission of the Action Plan to HUD.
5. Incorporation of and response to public comments received during the public comment period.

The Action Plan (as proposed and then when approved) will be made available for public review at the website link listed in Section 1.1. The City will take reasonable measures to notify citizens through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, and/or contacts with neighborhood organizations. The City will retain records on efforts made. For those who cannot obtain a copy of the Action Plan, the City will make copies available upon request at the address below.

Recovery and Grants Office  
1401 John F. Kennedy Blvd. Suite 1430  
Philadelphia, PA 1910  
Email: [cdbg-dr@phila.gov](mailto:cdbg-dr@phila.gov)  
Phone: 215-686-2643

The City will consider comments or views received in writing, via email, or during public hearings on the proposed Action Plan. The City will identify a deadline of no less than 30 days for submitting written comments on the proposed plan. Written comments may be emailed

to the City at [CDBG-DR@phila.gov](mailto:CDBG-DR@phila.gov) or mailed to 1401 JFK Boulevard, Suite 1430, Philadelphia PA 19102. A summary of all comments and responses will be included in the final Action Plan.

### 1.2.2 Amendments to the Action Plan

Substantial amendments to the CDBG-DR Action Plans for Hurricane Ida will require at least 30 days of public notice. The public notice procedures are described within this section. HUD has defined substantial amendments to the Action Plans as proposed changes that require the following decisions:

- When a program newly identifies or changes the eligibility criteria or benefits offered.
- When the City identifies a new or eliminates an existing category of unmet need.
- The creation of a new program or the deletion of an existing program.
- The allocation or reallocation of more than \$10 million or a reallocation that constitutes a change of 15% or greater of a program budget.

Amendments that meet the definition of a substantial amendment are subject to public notification and public comment procedures. Citizens will be provided with reasonable notice and an opportunity to comment on proposed substantial amendments to the Action Plan. A notice and copy of the proposed substantial amendment will be posted on the City's official website. Copies will be provided upon request at the City, if otherwise not accessible for review by any residents. Citizens will be provided with no less than 30 days to review and comment on the proposed substantial amendment. Written comments may be emailed to the City at [CDBG-DR@phila.gov](mailto:CDBG-DR@phila.gov) or mailed to 1401 JFK Boulevard, Suite 1430, Philadelphia PA 19102.] A summary of all comments received will be included in the substantial amendment that is submitted to HUD for approval and posted to the City's official website.

Non-substantial amendments are amendments that do not meet the threshold for a substantial amendment; non-substantial amendments do not require a public comment period. Nonsubstantial amendments to the Action Plan will be posted on the City's official website after notification is sent to HUD and the amendment becomes effective. Every amendment to the Action Plan (substantial and non-substantial) will be numbered sequentially and posted on the website.

### 1.2.3 Performance Reports

The City must submit a quarterly performance report (QPR) through HUD's Disaster Recovery Grant Reporting system no later than 30 days following the end of each calendar quarter. QPRs will be posted on the City's official website for public review after submission to HUD. The City's first QPR is due after the first full calendar quarter after the grant is awarded. QPRs will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported.

Each QPR will include information about the use of funds in activities identified in the Action Plan as entered in the HUD Disaster Recovery Grant Reporting system. This information

includes but is not limited to project name, activity, location, and national objective; funds budgeted, obligated, drawn down, and expended; the funding source and total amount of any non-CDBG-DR funds to be expended on each activity; beginning and actual completion dates of completed activities; achieved performance outcomes such as number of housing units completed or number of low- and moderate-income persons benefiting; and the race and ethnicity of persons assisted under direct-benefit activities. The City must also record the amount of funding expended. Efforts made by the City to affirmatively further fair housing will also be included in the QPR.

During the term of the grant, the grantee will provide citizens and other interested parties with reasonable and timely access to information and records relating to the approved program and to the grantee's use of grant funds as well as contracts procured with CDBG-DR funding. This information will be posted on the grantee's official website and provided upon request.

### **1.3 Citizen Participation and Accessibility for CDBG-DR**

In 2015 the citizens of Philadelphia voted to approve an amendment to the Philadelphia Home Rule Charter requiring City agencies to develop and implement a Language Access Plan. In May 2016 Mayor Jim Kenney issued an executive order launching Language Access Philly, a city-wide program designed to bridge the access gap by making it easier for residents with Limited English Proficiency (LEP) to obtain essential public information and services. The executive order also identified the Office of Immigrant Affairs, formerly known as the Mayor's Office of Immigrant and Multicultural Affairs, as the lead agency for the development and implementation of Language Access Plans. Under the guidance and direction of the Office of Immigrant Affairs, and by analyzing Limited English Proficiency data provided by HUD, the City assessed the language needs of non-English-speaking residents in Philadelphia, developed its Language Access Plan, and has identified and is implementing reasonable steps to provide language assistance, including translation of notices and other vital documents, to ensure meaningful access and participation. As recommended in the Language Access Plan, the City will translate vital documents, such as the Executive Summary of the Action Plan, into Spanish, Portuguese, Chinese (Simplified), Haitian Creole, and Vietnamese. These languages are identified by OIA as the top 5 languages most requested by residents when accessing City programs. The City will take appropriate steps to ensure effective communications for individuals with disabilities, as required by 24 CFR 8.6 and the Americans with Disabilities Act.

To ensure that limited English proficiency (LEP) individuals and persons with disabilities have prior notice and access to the public hearings, the City will take the following actions:

- Include a statement in public hearing notices indicating that participants may request language interpretation via email or phone to assist in their participation.

- Include a statement in public hearing notices indicating that the location of the meetings is accessible to persons with physical disabilities.
- Include a statement in public hearing notices that attendees can request reasonable accommodations from the City to participate in the public meetings.
- Make a reasonable effort to translate significant documents and include a Google Translate button on the City's website to accommodate LEP communities.

## 1.4 Technical Assistance

The City will provide technical assistance to facilitate citizen participation when requested, particularly to groups representative of low- and moderate-income persons. The level and type of technical assistance shall be determined by the applicant/recipient based upon the specific need(s).

## 1.5 Citizen Complaint Procedures

### 1.5.1 Complaints

Complaints may fall into two categories:

- **Formal complaints:** Formal complaints are written statements of grievance about a specific, addressable issue and may include faxes, emailed comments, handwritten notes, and comments submitted through the City's CDBG-DR website.

The City and all CDBG-DR partners shall ensure that a grievance process is in place prior to a program commencing. The process must stipulate how client grievances shall be resolved, and at the minimum contain the following elements:

- How the grievance shall be documented;
- Who (name and position title) shall be authorized to review and respond to the grievance;
- An appeal process if the complainant is not satisfied with first level response;
- Timeline for complaint resolution; and
- Tracking of complaints (how status and results shall be documented and reported).

Investigation results shall be maintained on file by each agency responsible for implementing a program. The City (and its designated subrecipients) shall make every effort to respond to formal complaints within fifteen (15) working days of receipt. If this is not possible, the City (or subrecipient) must document why additional time was needed. The City will track complaints by category through the resolution process.

- **Informal complaints:** Informal complaints are verbal complaints or written complaints that are too general in nature to act upon. The City (and its designated subrecipients) will attempt to resolve informal complaints; however, they are not subject to the written response process described above.



The City notes the following additional routes for submitting complaints:

- Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Members of the public can file a complaint directly with the HUD Region III Fair Housing and Equal Opportunity Office by emailing [ComplaintsOffice03@hud.gov](mailto:ComplaintsOffice03@hud.gov) or by calling (215) 861-7646 or TTY (215) 656-3450.
- The City will forward all complaints regarding fraud, waste, or abuse of funds to the HUD Office of the Inspector General (OIG) Fraud Hotline (phone: (800) 347-3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)). The City's procedures for identifying and addressing waste, fraud, and mismanagement will also be available for review on the CDBG-DR website.

### 1.5.2 Appeals

An appeal is a written request to reverse or revise a decision affecting eligibility for a CDBGDR-funded program. Each program providing direct assistance to the public will develop and implement policies and procedures for a formal appeals process including the timeline for considering and responding to the appeal, contact information for submitting appeals, and criteria on which appeals will be considered.

- Applicants may appeal decisions related to the following:
- determinations of eligibility for assistance based on income, maintenance of flood insurance, etc.;
- award amount; and
- determinations of necessary and reasonable costs.

Applicants may not appeal decisions based on overall program eligibility criteria. As an example, an applicant may appeal a decision of ineligibility by providing additional information to document the property owner properly maintained flood insurance on the subject property. The applicant may not appeal a decision of ineligibility by requesting to be exempted from flood insurance requirements.