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BEXAR COUNTY AMENDED CITIZEN PARTICIPATION PLAN

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



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DEVELOPMENT (HUD)

A. Introduction

Purpose

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

- 1) The Citizen Participation Plan
- 2) The Assessment of Fair Housing (AFH)
- 3) The Consolidated Plan (CP)
- 4) The Annual Action Plan (AAP)
- 5) The Consolidated Annual Performance and Evaluation Report (CAPER), and
- 6) The Section 108 Loan Guarantee Program

Lead Agency

The Division of Community Development is the lead agency responsible for the administration of the Community Development Block Grant Program (CDBG), the HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grant (ESG) Program.

Effective Date

Subsequent to approval of this Citizen Participation Plan by the County, the Plan shall be effective until it is amended or otherwise replaced.

B. Encouragement of Citizen Participation

General

The County provides for and encourages citizens to participate in the development, revision, amendment, adoption and implementation of the Citizen Participation Plan, the Assessment of



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

Non-English Speakers

The County has determined that non-English Spanish speakers who speak English less than very well comprise 35.7% of its population age 5 years and older based on 2015-2019 American Community Survey data. Copies of the Plan, as well as summaries of basic information about the CDBG and HOME programs and the documents covered by this Plan, are available in Spanish. Residents needing materials in Spanish should contact the County contact, or the designee.

When community meetings, focus groups or stakeholder interviews are conducted in accordance with this Plan, the County will provide Spanish translation services at locations where it is anticipated that non-English Spanish speakers will attend. In addition, the County will provide a Spanish version of all handouts, agendas, surveys and other materials at meetings where it is anticipated that non-English Spanish speakers will attend.

Persons with Disabilities

The County will conduct all public meetings in locations that are handicapped-accessible. Provisions will be made to accommodate individuals who require interpreter services for the deaf, auxiliary aides or services when requests are made at least five calendar days prior to the public meeting.

Low- and Moderate-Income Persons

The County will conduct at least one public meeting in a community that contains 51% or more low- and moderate-income residents based on current HUD data.

Organizations and Agencies

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



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Local Public Housing Authorities

The County encourages, in consultation with local public housing agencies, the participation of residents of any public housing developments located within the County, in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan. The County will provide information to the executive directors of the Opportunity Home San Antonio (f/k/a San Antonio Housing Authority), Bexar County Housing Authority, and the Schertz Housing Authority about the Assessment of Fair Housing, its affirmatively furthering fair housing strategy, and Consolidated Plan activities related to the public housing developments and communities so that the housing authorities can make this information available at the annual public hearings required for their respective Public Housing Authority Plans. The County encourages participation by resident advisory boards and resident councils of local public housing authorities. This will be carried out by providing to the local housing authorities information on public meetings, surveys and other outreach initiatives related to the documents covered by this Plan.

Online Access

The County will post draft copies and final copies of all documents covered by this Plan on its website accessible at <https://www.bexar.org/2746/Reports>.

Other Engagement Techniques

The Citizen Participation Plan has been and will continue to be amended as the County continues to gain access to technology that improves the avenues of participation by its residents.

Technical Assistance

Bexar County Economic and Community Development staff are available to assist Urban County Participating Cities, organizations and other eligible individuals that are interested in submitting a proposal to obtain funding through the programs covered by this Plan. All potential applicants are strongly encouraged to contact the Economic and Community Development Department for technical assistance before initiating a funding request application.

Public Notices

All public notices will be published in the *San Antonio Express-News* no less than two weeks before a public hearing or document review period, and will include a summary of the information to be presented at the public hearing. The notices shall also be posted on the Bexar County website accessible at <https://www.bexar.org/2746/Reports>.

County Contact Person



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All communication regarding the Citizen Participation Plan, the Assessment of Fair Housing, the Consolidated Plan, the Annual Action Plan, the CAPER, comments, complaints, reasonable accommodation for disabled persons, translation services, or other elements shall be directed to:

Community Development and Housing Director
Division of Community Development
Economic & Community Development
233 N. Pecos, Suite 320, San Antonio, Texas 78207
Phone: (210) 335-6648
rhreyna@bexar.org

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C. The Citizen Participation Plan

Amendments to the Approved Citizen Participation Plan

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

a. **Amendment Considerations**

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

b. **Draft Plan Review**

The draft Amended Citizen Participation Plan will be made available for public review for a 15-day period prior to County consideration and adoption, and may be done concurrently with the public review and comment process for the Consolidated Plan.

Comments Received on Draft Amended Citizen Participation Plan

Written comments will be accepted by the County Contact Person, or a designee, during the public review period. A summary of all written comments and those received orally during the public hearing, as well as the County’s responses to all written comments, will be attached to the Amended Citizen Participation Plan prior to submission to HUD.

a. **Public Hearing**

The County will conduct a public hearing to review and accept public comments on the draft Amended Citizen Participation Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan.

b. **Submission to HUD**

A copy of the Amended Citizen Participation Plan, including a summary of all written comments and those received during the public hearing will be submitted to HUD. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

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D. The Assessment of Fair Housing (AFH)

Plan Development

The County will follow the process and procedures described below in the development of its Assessment of Fair Housing (AFH).

a. HUD-approved Data for Public Review

The County will make available to the general public the HUD-approved data and other supplemental information that the County plans to incorporate into its AFH. The County will make this data available no later than 60 days after the initiation of the AFH document.

b. Stakeholder Consultation and Citizen Outreach

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

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

A variety of mechanisms may be utilized to solicit input from these entities. These include telephone or personal interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

c. Public Hearing

To obtain the views of the general public on AFH-related data and affirmatively furthering fair housing in the County’s housing and community development programs, the County will conduct at least one public hearing before the draft AFH is published for comment.

d. Public Display and Comment Period

The draft AFH will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of

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the content and purpose of the draft AFH, the dates of the public display and comment period, the locations where copies of the proposed document can be examined, how comments will be accepted, when the document will be considered for action by the Commissioners Court, and the anticipated submission date to HUD. In addition, the County will make available a reasonable number of free copies of the proposed document to residents and groups that request them.

e. **Comments Received on the Draft Assessment of Fair Housing**

Written comments will be accepted by the County Contact Person, or a designee, during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at the public hearings, in preparing the final AFH. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final AFH for submission to HUD.

Revisions to the Assessment of Fair Housing

The County shall follow the following procedure to revise its AFH, as needed.

a. **Revision Considerations**

The County will revise its AFH previously accepted by HUD under the following circumstances:

- A material change occurs. A material change is a change in circumstances in the County 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 Assessment no longer reflect actual circumstances. Examples include, but are not limited to:
 - Presidentially declared disasters, under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 *et seq.*), in the County that are of such a nature as to significantly impact the steps the County may need to take to affirmatively further fair housing
 - Significant demographic changes
 - New significant contributing factors in the County, and
 - Civil rights findings, determinations, settlements (including voluntary compliance agreements), or court orders
- Upon HUD's written notification specifying a material change that requires the revision.

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b. Public Display and Comment Period

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

In addition, the County will make available a reasonable number of free copies of the proposed revised document to residents and groups that request it.

c. Comments Received on the Draft Revised Assessment of Fair Housing

Written comments will be accepted by the County Contact Person, or a designee, during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at public hearings, in preparing the final Revised AFH. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised AFH for submission to HUD.

d. Submission to HUD

The Revised Assessment of Fair Housing will be submitted to HUD within 30 calendar days following the end of the public display and comment period.

E. The Consolidated Plan (CP)

Plan Development

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

a. Stakeholder Consultation and Citizen Outreach

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

- Local public housing authorities
- Other assisted housing providers
- Social service providers including those focusing on services to minorities, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes

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- Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws
- Regional government agencies involved in metropolitan-wide planning and transportation responsibilities

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

b. Public Hearings

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

The second public hearing will be conducted during or after the 30-day public comment period during which the County will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing consistent with the Assessment of Fair Housing.

c. Potential Displacement of Persons

Although the County does not anticipate any residential displacement to occur in the foreseeable future, it is required to describe its plans to minimize the displacement of persons and to assist any persons displaced. Should displacement of residents be necessary as a result of the use of funds covered by this Plan, the County shall compensate residents who are actually displaced in accordance with *HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition*. This resource is accessible online at http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/13780.

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d. **Public Display and Comment Period**

The draft CP will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft CP can be examined, how comments will be accepted, when the document will be considered for action by the Commissioners Court, and the anticipated submission date to HUD. The County will make available a reasonable number of free copies of the draft document to residents and groups that request them.

e. **Comments Received on the Draft Consolidated Plan**

Written comments will be accepted by the County Contact Person, or a designee, during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at the public hearings, in preparing the final CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CP for submission to HUD.

f. **Submission to HUD**

The CP will be submitted to HUD on or before August 15 before the County’s five-year program cycle begins on October 1.

Revisions to the Consolidated Plan

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

a. **Revision Considerations**

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

- To make changes to its activity priorities or the method of distribution of funds
- To carry out an activity using funds for any program covered by the Consolidated Plan but not previously described in the Action Plan or
- To change the activity, purpose, scope, location or beneficiaries of an activity.

All other changes to the method of distribution or investment strategy that do not meet the criteria defined above will be considered minor amendments, will be reviewed and

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approved by Economic and Community Development staff and will not be subject to public comments.

b. **Public Display and Comment Period**

The draft Revised CP will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the proposed revised CP can be examined, how comments will be accepted, when the document will be considered for action by the Commissioners Court, and the anticipated submission date to HUD. In addition, the County will make available a reasonable number of free copies to residents and groups that request them.

c. **Comments Received on the Draft Revised Consolidated Plan**

Written comments will be accepted by the County Contact Person, or a designee, during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at public hearings, in preparing the final Revised CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised CP for submission to HUD.

d. **Submission to HUD**

The Revised CP will be submitted to HUD within 30 calendar days following the end of the public display and comment period.

F. The Annual Action Plan (AAP)

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

Plan Development

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

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a. Public Hearings

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

The second public hearing will be conducted during or after the 30-day public comment period during which the County will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing consistent with the Assessment of Fair Housing.

b. Public Display and Comment Period

The draft AAP will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of the AAP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by the Commissioners Court, and the anticipated submission date to HUD. In addition, the County will make available a reasonable number of free copies to residents and groups that request them.

c. Comments Received on the Draft Annual Action Plan

Written comments will be accepted by the County Contact Person, or a designee, during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at the public hearings, in preparing the final AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final AAP for submission to HUD.

d. Submission to HUD

The AAP will be submitted annually to HUD on or before August 15 before the start of the County’s program year on October 1.

Revisions to the Annual Action Plan

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

a. Revision Considerations

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

- To make changes to its activity priorities or the method of distribution of funds
- To carry out an activity using funds for any program covered by the Consolidated Plan but not previously described in the Action Plan or
- To change the activity, purpose, scope, location or beneficiaries of an activity.

All other changes to the method of distribution or investment strategy that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by Economic and Community Development staff, and will not be subject to public comments.

b. Public Display and Comment Period

The draft Revised AAP will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by the Commissioners Court, and the anticipated submission date to HUD. In addition, the County will make available a reasonable number of free copies to residents and groups that request them.

c. Comments Received on the Draft Revised Annual Action Plan

Written comments will be accepted by the County Contact Person, or a designee, during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at public hearings, in preparing the final Revised AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised AAP for submission to HUD.

d. Submission to HUD

The Revised CP will be submitted to HUD within 30 calendar days following the end of the public display and comment period.



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G. Consolidated Annual Performance and Evaluation Report (CAPER)

Report Development

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

a. Report Considerations

Economic and Community Development staff will evaluate and report the accomplishments and expenditures of the previous program year for CDBG, HOME, and ESG and draft the CAPER in accordance with HUD requirements.

b. Public Display and Comment Period

The draft CAPER will be placed on display for a period of no less than 15 calendar days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CAPER, a summary of program expenditures, a summary of program performance, the dates of the public display and comment period, the locations where copies of the draft CAPER can be examined, how comments will be accepted, and the anticipated submission date to HUD.

c. Comments Received on the Draft CAPER

Written comments will be accepted by the County Contact Person, or a designee, during the 15-day public display and comment period. The County will consider any comments or views of County residents received in writing in preparing the final CAPER. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CAPER for submission to HUD.

d. Submission to HUD

The CAPER will be submitted annually to HUD no later than December 30.

H. Complaints

Residents may register complaints regarding any aspect of the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), or Emergency Solutions Grant (ESG) programs by contacting the County Contact Person, or a designee. All written complaints received will be addressed in writing within fifteen calendar days.

Residents wishing to object to HUD approval of the final CP may send written objections to the



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HUD Area Office located at Hipolito Garcia Federal Building, 615 East Houston Street, Suite 347 San Antonio, TX 78205-2001. Objections should be made within thirty calendar days after the County has submitted the plan to HUD. Any objections made must be based on the following reasons:

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

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