



# Citizen Participation Plan

## Titusville, FL



### Consortium Partners

Federal funds provided by the  
U.S. Department of Housing and Urban Development  
Office of Community Planning and Development

*Adopted by*  
**Titusville City Council**  
**2021-2026 CDBG Consolidated Plan**

**(This version supersedes prior versions of the Citizen Participation Plan)**  
**The CPP may be amended from time to time to incorporate regulatory changes, references, and policies**

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## I. Introduction

### Purpose and Background

Titusville, Florida receives federal funding from the U.S. Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG) to support affordable housing and community development initiatives serving low- and moderate-income individuals in the community. Brevard County and four cities in Brevard County—Cocoa, Melbourne, Palm Bay, and Titusville—form the Brevard HOME Consortium (Consortium) for the purpose of receiving federal HOME funds to help meet the community's affordable housing needs. Brevard County is the lead entity for the Brevard HOME Consortium and administers HOME funds on behalf of its members. Brevard County and the four cities receive separate allocations of CDBG funds.

As recipients of CDBG and HOME funds, Titusville, and the Consortium, develop multiple plans and reports that are submitted to HUD to demonstrate compliance with federal requirements, which include:

- A Five-Year Consolidated Plan for Housing and Community Development (Con Plan)
- Annual Action Plans (AAPs)
- Consolidated Annual Performance and Evaluation Reports (CAPERs)
- A fair housing plan<sup>1</sup>
- Amendments to the Citizen Participation Plan (CPP)
- Amendments to the Con Plan or AAPs

### Citizen Participation Requirements

To guide the consultation and public participation process for the development of these plans and reports, federal regulations require grantees to develop and adopt a CPP that sets forth the jurisdiction's policies and procedures for citizen participation. Pursuant to the requirements outlined under [24 CFR Part 91.105](#), Titusville and the Brevard HOME Consortium sets forth the following CPP as it relates to the administration of federal funds provided by HUD.

As the lead entity of the HOME Consortium, the Brevard County Housing and Human Services Department is responsible for the planning, preparation, day-to-day activities of the HOME program, as well as the consolidated submission of the Consortium's Con Plan, AAPs, Fair Housing plan, and CAPER for the HOME program, as well as the administration of the County's CDBG allocation. Titusville, as a CDBG entitlement city, is responsible for the planning, preparation, day-to-day activities of its CDBG program and submission of its CAPER directly to HUD.

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<sup>1</sup> The fair housing plan has previously been referred to as an "Analysis of Impediments," "Assessment of Fair Housing," and "Affirmatively Furthering Fair Housing Plan."

The County also refers to the “Lead Entity” and administrator of the HOME Program for the Brevard HOME Consortium, where applicable.

## **Contact**

All communication regarding the reports covered by this CPP—including comments, complaints, and requests for reasonable accommodation for persons with disabilities, translation services, or other elements—shall be directed to:

City of Titusville  
Neighborhood Services Department  
725 S. DeLeon Avenue  
Harry T. Moore Social Service Center  
Titusville, FL 32780  
PH: 321-567-3997  
Email: [neighborhoodservices@titusville.com](mailto:neighborhoodservices@titusville.com)

## **Effective Date**

The CPP is effective upon the adoption of City’s CDBG Five Year Consolidated Plan, and it shall be effective until it is amended or otherwise replaced.

## **II. Development of Documents**

### **Regulatory Requirements**

As described in [24 CFR Part 91.1 – 91.600](#), jurisdictions that receive HUD formula grant programs must develop a Con Plan to serve as the housing and community development strategic plan that guides the use of grant funds in the jurisdiction. In the development of the Con Plan, AAPs, CAPERs, and fair housing plans, jurisdictions must follow the policies and procedures regarding citizen participation that are outlined in the jurisdiction’s CPP.

### **City’s Process**

The primary purpose of the federal programs included in the AAP and CPP is to provide decent housing, a suitable living environment, and/or economic opportunities that primarily benefit low- and moderate-income persons in the community.

Prior to the adoption of the Con Plan, the City will make information available to the public, including the expected amount of entitlement funding from HUD for Titusville, the range of activities using this funding that the City may undertake, and the

amount of funding expected to benefit low- and moderate-income persons.

The City is responsible for developing its own priorities and programs within HUD guidelines through the Con Plan process. To develop and implement an effective program, the City actively engages residents, local and regional agencies, the Continuum of Care, local housing authorities, health agencies addressing lead-based paint hazards, broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibility include the management of flood prone areas, public land or water resources, and emergency management agencies, businesses, developers, nonprofit institutions, philanthropic organizations, and community-based and faith-based organizations at each stage of the process, including in the:

- Identification of housing and community development needs.
- Development of a Five-Year Con Plan that establishes the City's needs, program goals, and funding priorities.
- Preparation of an AAP that outlines the proposed use of each year's allocation.
- Preparation of a Consolidated Annual Performance Evaluation Report (CAPER) that provides an account of expenditures and program accomplishments.
- Consideration of substantial amendments to the CPP, Con Plan, Annual Plan, CAPER, and fair housing plans.
- Arrangement of public comment and hearings for proposed plans.

All citizens will have an opportunity to comment on the City's CPP, and any amendments made hereafter, during the required public comment period (30 days).

### **III. Encouragement of Citizen Participation**

#### **Regulatory Requirements**

The federal requirements for the CPP for local governments are outlined under [24 CFR Part 91.105](#) and describe the content that jurisdictions must include in the CPP. The regulations require that the CPP outline the jurisdiction's process for encouraging citizen participation and input from stakeholders such as local and regional institutions, public housing authorities, Continuums of Care, broadband internet providers, agencies whose primary responsibility include flood prone areas, public land or water resources, and emergency management, and other organizations such as businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations in the development of the Con Plan, AAP, CAPER, and fair housing plan. The jurisdiction should encourage participation by low- and moderate-income persons in the community, non-English speakers (or those who speak English less than very well), and persons with disabilities.

## **City Process**

The City believes that the CPP process provides an important opportunity for its residents, especially low- and moderate-income residents, nonprofit groups (such as neighborhood organizations), and other service providers, to be actively involved in the preparation and implementation of the Con Plan. The City encourages the participation of local and regional institutions, the Continuum of Care, and other organizations such as businesses, developers, nonprofit organizations, philanthropic organizations, and community or faith-based organizations in the process of developing and implementing the documents related to the Con Plan process.

The City will also encourage participation from broadband internet service providers, organizations engaged in narrowing the digital divide, agencies who manage flood-prone areas, public land, or water resources, and emergency management agencies in the development of the Con Plan.

The CPP actively encourages widespread citizen participation, with a special emphasis on good faith efforts to encourage participation from the following populations:

- Low- and moderate-income persons.
- Residents of slums, blighted areas, and predominately low- and moderate-income areas where 51 percent of the residents are at or below 80 percent of the area median income.
- Residents of areas designated as a revitalization area.
- Non-English-speaking persons.
- Persons with disabilities.
- Public housing residents and other low-income residents of targeted revitalization areas.

The CPP ensures that all parties, including residents, nonprofit organizations, and other interested organizations, are afforded adequate opportunity to review and comment on plans, programs, activities, and reports covering the City's federally funded housing and community development programs. This includes minority populations, people with limited English proficiency (LEP), and persons with disabilities.

## **IV. Citizen Comments and Public Participation**

### **Regulatory Requirements**

The federal requirements for providing residents the opportunity to submit comments are described in [24 CFR § 91.105](#). Grantees must hold at least two public hearings during the program year (held at two different stages of the program year) to obtain comments, questions, and input from residents. In addition, grantees must hold a public comment period for at least 30 calendar days to provide residents the opportunity to submit

comments or questions about the Con Plan. At least one of the two required public hearings must be held before the draft Con Plan is published for the public comment period.

## **City's Process**

The City will provide the public with an opportunity to share their views and comments on plans, reports, and efforts to affirmatively further fair housing. The City, in partnership with the Brevard HOME Consortium, will implement the following strategies to ensure citizen participation.

### *A) Public Hearings*

- 1.** Pursuant to HUD regulations (24 CFR § 91.105(e)), the City will conduct a minimum of two public hearings held at different planning stages within the program year prior to the submission of the Con Plan and/or AAP to allow for resident participation in the development process. One public hearing will be held before the proposed Con Plan is published for comment and one hearing will be held prior to the submission of the proposed Con Plan, substantial amendments to the Con Plan or AAP, and fair housing plan. The purpose of the public hearings is to solicit the views of citizens regarding the following:
  - a.** Housing and community development needs.
  - b.** Priority non-housing community development needs.
  - c.** The development of proposed activities.
  - d.** Review of program performance.
- 2.** Public hearings and neighborhood meetings will be held at sites that are accessible to persons with disabilities. These meetings will be advertised on the City's website and in a newspaper of general circulation at least fifteen days prior to the scheduled hearing/meeting and indicate the purpose, date, time, and location. Additionally, the City will post notices on the Neighborhood Services Department webpage, Facebook social media page when active, and distribute to active community groups and stakeholders via email communications.

### *B) Comment Period*

The comment periods for plans and reports are listed in Table 1.

**Table 1: Public Comment Period**

<b>Document</b>	<b>Comment Period</b>
Con Plan & AAP	30 calendar days
Substantial amendments to Con Plan & AAP	30 calendar days
Fair Housing Plan (Assessment of Fair Housing)	30 calendar days

CPP	30 calendar days
CAPER	15 calendar days

See [Section X. State of Emergency Amendment](#) for guidance in the event of a natural disaster or declared emergency.

Written comments regarding the City's CDBG program should be addressed to:

Neighborhood Services Department  
 Harry T. Moore Social Service Center  
 725 S. DeLeon Avenue  
 Titusville, FL 32780  
 PH: 321-567-3997  
 Email: neighborhoodservices@titusville.com

Contacts for each of the Consortium members are referenced in Table 2.

**Table 2: Consortium Member Contact Information**

Brevard County Housing and Human Services Department 2725 Judge Fran Jamieson Way Building B, Suite 106 Viera, Florida 32940 (321) 633-2076 (321) 633-2170 (fax)	City of Cocoa Housing and Neighborhood Services Division 65 Stone Street Cocoa, FL 32922 (321) 433-8511 (321) 433-8543 (fax)
City of Melbourne Housing and Improvement Division 695 E. University Boulevard Melbourne, FL 32901 (321) 674-5734 (321) 674-5738 (fax)	City of Palm Bay Housing & Neighborhood Development Services 120 Malabar Road SE Palm Bay, FL 32907 (321) 952-3429 (321) 733-3087 (fax)

**C) Public Notice**

Adequate notice of all public hearings and public meetings will be provided to residents through posting on the City's webpage and direct notification to stakeholders. Adequate notice is defined as 14 calendar days. Public notices shall indicate the date, time, location, purpose of the meeting, and information about the issues to be discussed.

The notice will detail locations where the entire draft plan(s) will be made available for review. Locations for public documents are included in Table 3.

**Table 3: Public Document Review Locations**

<b>Location</b>	<b>Facility</b>
<b>City of Titusville</b>	Titusville City Hall 555 S. Washington Av, Titusville 32796
	Harry T. Moore Social Service Center 725 S. DeLeon Av, Titusville 32780 <a href="https://www.titusville.com/1416/PROGRAM-PLANS-AND-PERFORMANCE-REPORTS">https://www.titusville.com/1416/PROGRAM-PLANS-AND-PERFORMANCE-REPORTS</a>
<b>Brevard County (Viera)</b>	Brevard County Housing and Human Services Department website: <a href="https://www.brevardfl.gov/HousingAndHumanServices/PlansAndReports">https://www.brevardfl.gov/HousingAndHumanServices/PlansAndReports</a>

The City will consider any comments or views of its residents received orally at the public hearings. Written comments or views will be accepted during the public comment period.

*D) Non-English Speakers*

The City of Titusville take steps to ensure that Limited English Proficiency (LEP) persons who are eligible for City programs or services have meaningful access to programs, services, and benefits that the City provides. The most important step in meeting this obligation is for recipients of federal financial assistance such as grants, contracts, and subcontracts to provide the language assistance necessary to ensure such access at no cost to the LEP person.

Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from federal agencies require federal aid recipients to take reasonable steps to ensure meaningful access to programs, services, and activities by those who do not speak English proficiently. To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the City's programs, services, or activities.
- The frequency with which LEP individuals come in contact with these programs, services, or activities.
- The nature and importance of the program, service, or activity to people's lives.
- The resources available to the City and the costs of the LEP services.

Using census data, the City has determined that LEP individuals speaking English less than well represent approximately 1 percent of the community. The City realizes that such statistical data can be outdated or inaccurate. Therefore, the City contacted City departments, local law enforcement, social service agencies, and schools to determine the proportion of LEP persons served by those entities. Spanish speakers were the most prevalent LEP public service recipients. Given this information, the City

reasons that relatively few of its service population are LEP speakers of Spanish.

1. The City believes that housing assistance, emergency management, emergency medical services, and solid waste collection are of critical importance to the citizens of Titusville. In that spirit, the City has various documents for each department translated into Spanish. Additionally, the City will post this policy and plan in Spanish and English on the City's webpage so every member of the public is aware of its nondiscrimination and public involvement policies.
2. The City occasionally receives requests for translation or interpretation of its programs, services, or activities in Spanish.
3. The City has several employees who speak multiple languages, including employees who speak Spanish. This allows translation to be conducted between Spanish-speaking members of the City and the employees of the City.

The analysis of these findings suggests that the following LEP services are needed:

- Continue to provide the documents that are currently provided in Spanish, adding and discontinuing documents based on demand.
- Maintain a list of employees who speak Spanish and other languages and who are willing to provide translation or interpretation services. Distribute the list to staff that regularly have contact with the public.
- Continue to provide notification in Spanish of the availability of LEP assistance in public meeting notices and on public involvement event signs.

The City understands that its community demographics are ever-changing and the four factors of analysis may reveal the need for more LEP services in the future. As such, it will biennially examine its plan to ensure that it continues to meet the community's needs.

Persons requiring special language services should contact the Neighborhood Services Department:

Tracy Davis  
Neighborhood Services Manager  
Address: 725 S. DeLeon Av, Titusville, FL 32780  
Email: [cdbg2@titusville.com](mailto:cdbg2@titusville.com)  
Phone: (321) 567-3997  
Fax: (321) 268-5614

#### *E) Persons with Disabilities*

The following procedures establish a mechanism for individuals with disabilities to request reasonable accommodations to enable them to participate in City-sponsored programs, events, or services.

The City Human Resources Director, on behalf of the City, will ensure the Americans with Disabilities Act (ADA) requirements are met in providing accessible, usable services and facilities for all persons with disabilities.

Reasonable accommodation request based on the ADA should be made to the ADA Coordinator at 321-567-3725 or via email at [joe.denaro@titusville.com](mailto:joe.denaro@titusville.com)

- i. The City staff member that is requesting the interpreter is to contact the ADA Coordinator at least 48 hours in advance of the meeting or event. It will be the responsibility of the Neighborhood Services Department to pay for interpreter services, as needed, in compliance with the Florida Prompt Payment Act (Florida Statutes 218.70–79).
  - ii. The following information is required to secure an interpreter:
    - Date and time of the meeting/event.
    - Location of the meeting/event.
    - Length of the meeting/event.
    - Name(s) of the person(s) requesting the interpreter.
    - Subject of the meeting/event.

#### 2. Assistance for the Visually Impaired

City documents must be accessible per Administrative Order 49. When a request is made by a citizen to provide documents in an alternate accessible format (large print, braille, or auto tape) the City will be prepared to provide the requested information to the citizen within 48 hours of the request. If assistance is needed by the City, the department will notify the City ADA Coordinator immediately.

#### 3. Other Types of Disabilities Not Covered by this Administrative Order

- a. Requests for other types of accommodation need to be directed to the Neighborhood Services Department no later than 48 hours prior to the event.
- b. When a request has been made, the City will review the request to either accept or deny the request. If the City denies the request, they shall contact the City ADA Coordinator for a review of the denial.
- c. If the request for accommodation is denied, an interactive meeting is to be set up between the City ADA Coordinator, City Attorney's office, and the person requesting the accommodation to discuss alternate accommodations.

#### 4. Complaints Received at Program/Service

In the event an individual with a disability attempts to participate in a program or service that they feel does not meet their accessibility needs as set forth by the ADA as amended,

the ADA Coordinator should be contacted immediately by the person filing the complaint. If the ADA Coordinator is not available at the time of the complaint, then a representative of the hosting department/office shall gather the following information from the complainant and immediately forward the information to the ADA Coordinator for a prompt follow-up:

- a.** Contact information of the complainant.
- b.** Specific complaint.
- c.** Hosting department/office of the program/service.
- d.** Time and location of the complaint.
- e.** What the department/office attempted to do to resolve the issue, if anything.

If requested, citizens with disabilities that may be unable to review documents at publicized locations who are transportation disadvantaged should contact the City for specific assistance to obtain documents for review and assistance in submitting comments. In addition, [the City will email or mail copies of public meeting notices to persons that request such accommodation no less than 48 hours prior to the public meeting.](#)

## **V. Plans and Reports**

The following describes the City's key planning and reporting documents for the CDBG program.

### **1. Consolidated Plan**

The Con Plan guides the use of federal CDBG funds for a five-year period. It describes the estimated amount of assistance, priorities, and range of activities that will benefit low- and moderate-income people.

#### **Plan Development**

The City will follow the process and procedures described below in the development of the Con Plan.

##### *a. Stakeholder Consultation and Citizen Outreach*

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

- Public housing authorities serving the city, Housing Authority of the City of Titusville.
- 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 regional organizations that represent protected class members and organizations that enforce fair housing laws.
- Regional government agencies that are involved in metropolitan-wide planning and transportation responsibilities.

- Broadband internet service providers and organizations engaged in narrowing the digital divide.
- Agencies whose primary responsibilities include the management of flood-prone areas, public land, or water resources.
- Emergency management agencies.

When preparing the portion of the Con Plan concerning lead-based paint hazards, the City shall consult with local or state health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead-poisoned.

When preparing the description of priority non-housing community development needs, the City will notify adjacent units of local government, to the extent practicable. This shall involve, at a minimum, the City sending a letter to the chief elected official of each adjacent unit of government notifying them of the draft Con Plan and how to access a copy online for review and comment.

The City may use a variety of engagement methods to solicit input from residents and stakeholders in the community such as virtual or in-person interviews, surveys, focus groups, or workshops.

*b. Public Hearings*

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

The second public hearing will be conducted during the 30-day public comment period, during which the City will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing consistent with the fair housing plan.

*c. Potential Displacement of Persons*

Although the City does not anticipate any residential displacement to occur in the foreseeable future, it is required to describe its plans to minimize the displacement of persons and to assist any persons displaced. When displacement is unavoidable on a temporary or permanent basis, the City will comply with the federal Uniform Relocation Act. Should displacement of residents be necessary due to the use of funds covered by this CPP, the City shall compensate residents who are actually displaced in accordance with [HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition](#).

*d. Public Display and Comment Period*

The draft Con Plan will be placed on display for a period of at least 30 days to encourage

public review and comment. The public notice shall include a brief summary and purpose of the Con Plan; the anticipated amounts of funding (including program income, if any); proposed activities likely to result in displacement, if any; plans for minimizing the displacement of persons as a result of CDBG activities, if any; plans to assist persons actually displaced by the project, if any; the dates of the public display and comment period; the locations where copies of the draft Con Plan can be examined; how comments will be accepted; when the document will be considered for action by the Titusville City Council; and the anticipated submission date to HUD. Table 2 provides the locations where individuals can review copies of the draft Con Plan.

Additionally, the City 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 Contact Person, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of city residents received in writing, or orally at the public hearings, in preparing the final Con Plan. 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 Con Plan for submission to HUD.

*f. City Council Action*

Following the public hearing, the Con Plan will be presented to City Council for consideration and formal action.

*g. Submission to HUD*

The Con Plan will be submitted to HUD no fewer than 45 days before the start of the City's five-year Con Plan cycle.

## **2. Annual Action Plan**

The AAP is a component of the Con Plan, and it describes the City's proposed use of available federal and other resources to address the priority needs and specific objectives in the Con Plan for each program year, the City's method for distributing funds to local non- profit organizations, and any geographic areas of the City to which it will direct assistance. The program year begins October 1 and ends September 30.

### **Plan Development**

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

*a. Public Hearings*

The City will conduct at least two public hearings during the development of the AAP. The first public hearing will be conducted before the AAP draft is published for public comment. During the first public hearing, the City will address housing and community development needs, development of proposed activities, the amount of assistance the City expects to receive (including grant funds and program income), the range of activities that may be

undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The City will conduct the second public hearing during the 30-day public comment period during which the City will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing consistent with the fair housing plan.

*b. Public Display and Comment Period*

The draft AAP will be placed on display for a period of at least 30 days to encourage public review and comment. The public notice shall include a brief summary of the AAP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by City Council, and the anticipated submission date to HUD. Table 2 provides the locations where individuals can review copies of the draft Con Plan.

Additionally, the City 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 Contact Person, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of its 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. City Council*

Following the public hearing, the AAP will be presented to City Council for consideration and formal action.

*e. Submission to HUD*

The AAP will be submitted to HUD no fewer than 45 days before the start of the County's annual program year.

### **3. Amendments to the Consolidated Plan and Annual Action Plan**

For the CPP, amendments to the Con Plan and AAP are divided into two categories: substantial amendments and minor amendments.

*a. Substantial Amendments*

A substantial amendment to the Con Plan or an AAP may be required to allow for new activities, modification of existing activities, or other program changes.

The criteria for what constitute a substantial change that requires an amendment are as follows:

- Adding a new activity not previously described in the Con Plan or AAP.
- Deleting an activity previously described in the Con Plan or AAP.
- Changing the purpose, scope, location or beneficiaries of an activity previously described in the Con Plan or AAP.
- Changing allocation priorities or changing the method of the distribution of funds for the benefit of very low- to moderate-income persons falls below the 70% threshold as a result of any proposed decrease or increase in expenditures for any one project or activity.
- A 50 percent change in the project funded amount, if the project is funded at \$24,999 or less.
- A 25 percent change in the project funded amount if the project is funded at \$25,000 and above.

Note: allocations for projects and activities included in the APP can be increased or decreased more than the above percentages provided there is not a change in the purpose, scope, location or beneficiaries of the activity.

Substantial amendments are subject to the citizen participation process and require formal action by the City Council and submission to HUD by the end of the program year. The City announces substantial amendments to the public by publishing a public notice in one or more newspapers of general circulation for a period of 30 days to provide the opportunity for the public to review and comment on the proposed substantial amendments.

The notice will be available in English and may also be available in Spanish and other languages, as feasible. The City will consider all written or oral comments or views received during the public comment period from the public concerning proposed substantial amendments in accordance with 24 CFR 91.105(c)(3). A summary of these comments and views, including comments or views not accepted and the reason why, shall be attached to the substantial amendment.

#### *b. Minor Amendments*

Minor amendments (also known as “administrative transfers”) represent any action that changes an activity budget in an AAP by less than the 25 percent or 50 percentages. These require the approval of the City’s Neighborhood Services Director or designated representative but do not require public notice or City Council approval.

### **4. Consolidated Annual Performance and Evaluation Report**

The City is required by HUD regulations to report annually on its performance in implementing the activities of the Con Plan. This takes place via the CAPER. The CAPER must be submitted to HUD no later than 90 days from the end of a program year (December 31).

To allow the public to comment on the performance report, the City will publish a notice in one or more newspapers of general circulation stating that its draft CAPER is available for review. The notice will be available in English and may also be available in Spanish and

other languages, as feasible. The notice will detail locations where the entire draft CAPER will be made available for review. Additionally, the CAPER will be made available on the department's webpage.

## **Report Development**

The County shall adhere to the following procedure in the drafting and adoption of its CAPER.

### *a. Report Considerations*

The City will evaluate and report the accomplishments and expenditures of the previous program year for CDBG 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 at least 15 days to encourage public review and comment. Public notice of the display and comment period will be published no fewer than two weeks before the period begins with accommodation for persons with disabilities and non-English Spanish speakers in accordance with this CPP. The public notice shall include a brief summary and purpose of the CAPER, the dates of the public display and comment period, the locations where copies of the draft CAPER can be examined, how comments will be accepted, and the anticipated submission date to HUD. Copies of the draft CAPER will be made available for review at the locations noted in Table 3.

### *c. Comments Received on the Draft CAPER*

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

### *d. Submission to HUD*

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

## **Plan Access**

See Table 3 for locations of copies of the draft CAPER for review.

## **5. Fair Housing Plan**

In coordination with the Con Plan process, the City, in partnership with the County HOME Consortium, prepares a fair housing plan and reports annual progress toward the identified fair housing goals and actions in the CAPER.

## Regulatory Requirements

In February 2023, HUD published a Notice of Proposed Rulemaking called "[Affirmatively Furthering Fair Housing](#)" in the Federal Register that outlines proposed fair housing planning requirements for communities to comply with Title VIII of the Civil Rights Act of 1968 (commonly known as the Fair Housing Act) to affirmatively further fair housing. During the proposed rulemaking period, the [Affirmatively Furthering Fair Housing Interim Final Rule](#) remains in effect.

## Process

The Consortium continue to commit to and certify compliance with federal affirmatively furthering fair housing requirements by developing a fair housing plan for the Consortium. The fair housing plan is an analysis of the local fair housing landscape that describes the public and private policies and practices that may limit fair housing choice and access to opportunities in the jurisdiction. The plan identifies fair housing issues and outlines goals for each jurisdiction included in the County and then describes the actions each jurisdiction can take to address the identified fair housing issues. The Consortium prepares the fair housing plan in a cycle similar to the Con Plan process and reports annual progress and work toward the fair housing goals in the CAPER.

## Plan Development

Fair housing plans typically contain the following sections:

- A summary of the citizen and stakeholder engagement conducted by the Consortium to gather input from the community on the fair housing issues impacting each jurisdiction included in the plan.
- An analysis of the demographic composition of persons residing in each jurisdiction included in the plan.
- An assessment of the fair housing issues that restrict fair housing choice or access to opportunities.
- An assessment of the contributing factors that create, contribute to, perpetuate, or exacerbate one or more of the identified fair housing issues.
- An identification of the Consortium's fair housing goals and actions to address the identified fair housing issues in each jurisdiction.

In the development of the fair housing plan, the Consortium may use a variety of engagement methods to solicit input from residents and stakeholders in the community such as virtual or in-person interviews, surveys, focus groups, or workshops. Engagement with stakeholders includes but is not limited to the following types of organizations serving the community:

- Public housing authorities serving the jurisdictions included in the plan.
- Providers of assisted housing.
- 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 regional organizations that represent members of protected classes as well as organizations that enforce fair housing laws.
- Public agencies involved in local planning, zoning, and transportation responsibilities.

### **Revisions to the Fair Housing Plan**

In the event that a fair housing plan that has been reviewed by HUD must be revised, the Consortium will update and resubmit the plan to HUD for review when one or more of the following occurs:

- Circumstances such as a natural disaster, significant demographic change, new contributing factors impacting fair housing choice, and/or civil rights findings prompt the Consortium to update the analysis, contributing factors, goals, and/or actions included in the fair housing plan.
- The Consortium receives a written notification from HUD specifying a material change in the fair housing plan.

#### *a. Public Hearing*

The Consortium will hold at least one public hearing to obtain the views of residents on the fair housing plan-related data and affirmatively furthering fair housing in the Consortium's housing and community development programs. The Consortium will hold this public hearing before the draft fair housing plan is published for comment.

#### *b. Draft Fair Housing Plan*

Before the Consortium submits the fair housing plan to HUD for review, the Consortium will make a draft version of the fair housing plan available to citizens, public agencies, and other interested parties for review and will establish the means to submit comments or questions on the plan. The Consortium will publish the draft version of the fair housing plan for a period of at least 30 days to provide residents with sufficient opportunity to review and comment on the document. A summary describing the contents and purpose of the fair housing plan will be published in one or more newspapers of general circulation and on the Consortium members websites as identified in Table 3.

## **6. Citizen Participation Plan**

The CPP (this subject document) is required by HUD regulations and outlines the means and methods that the City uses to encourage public input into the planning and review process for the City's CDBG program.

Pursuant to 24 CFR Part 91.105, the City has developed and adopted this CPP and is committed to its implementation. The procedures outlined herein are designed to encourage all residents to participate in process and program development.

When changes to the CPP are necessary, the City will publish a notice in one or more newspapers of general circulation and its webpage that the amended CPP is available to review so that the public will have sufficient opportunity to review and comment on the

updates. There will be a 30-day public comment period prior to the adoption of the amended CPP. Upon request, the CPP can be made available in a format accessible to persons with disabilities.

## **VI. Access to Records**

Records relevant to the Con Plan process and program administration are available for the preceding six years. Citizens, public and private agencies, and other interested parties will be given reasonable and timely access to information and records related to the Con Plan and program activities.

## **VII. Anti-Displacement and Relocation Policy**

Applicants are encouraged to propose projects that avoid or minimize displacement. Projects that include federal funding (CDBG) intended for the acquisition, demolition, or rehabilitation of a building that has residential or commercial tenants in place must follow the federal relocation requirements of the Uniform Relocation Act, as described in 49 CFR Part 24, and the Real Property Acquisitions Regulations for Federal and Federally Assisted Programs, as well as the Barney Frank Amendment, Section 104(d), if applicable.

The City's Con Plan activities are designed to eliminate or minimize the displacement of residents. Program guidelines and limitations are structured so that permanent displacement is unlikely. Should displacement occur, displaced persons may be offered one or more of the following depending on the project's funding source:

- A rent subsidy for another unit.
- A cash payment to be used for rent or a down payment on the purchase of a dwelling unit.
- Moving and related expenses.

## **VIII. Technical Assistance**

The City's Neighborhood Services Department will provide technical assistance to groups representing low- and moderate- income persons who request assistance in commenting on the fair housing plan or in understanding the requirements for developing proposals and preparing applications under the Con Plan and the AAP. The Department will hold a Technical Workshop during the application cycle. All new applicants or applicants that have not received CDBG federal funding previously, will be required to attend.

The City may use one of several basic models to solicit sub-recipients for funding under CDBG, and additional qualifying programs within the framework of the Con Plan and Action Plan.

## A. Basic Models

Depending on the situation and circumstance of the project or the needs of the community, the Neighborhood Services staff may choose any one of the following models or variations of the approaches to assist in the solicitation process of sub-recipients. The basic models are as follows:

- 1. Formal Application Process, Request for Proposal:** This requires the submission of a formal application, typically undertaken once a year in conjunction with the planning process. Applications are evaluated based on explicit selection criteria. This process works best for projects with numerous or complex activities, potential applicants with varying degrees of experience, limited funding, and increased competition.
- 2. Pre-Application Process:** This approach will allow the City to review applications before requesting additional detailed information or making final recommendations. This process will be useful in encouraging the participation of potential sub-recipients unfamiliar with the request for proposal process or matching funds for a larger project.
- 3. Request for Qualifications:** The City will identify potential qualified sub-recipients through an informal process or a general request for qualifications. From the identified group, the City will identify organizations qualified to carry out specific activities and will approach the organization. This process will be proactive and focused on qualified organizations that have the capacity to present new and innovative approaches to APP objectives.
- 4. “Open Door” or Unsolicited Application Process:** This allows application requests to be accepted and considered at any time during the program year until funds are no longer available. The unsolicited application shall meet the same requirements of the solicitation process already in place for the identified funding source. The application shall be evaluated based on the criteria used during the formal application process, with selections to be recommended by staff. For Community Housing Development Organization funding, the “open door” or unsolicited application process may be used. The City will accept applications from County-designated Community Housing Development Organizations throughout the program year for as long as funding is available, and the City will notify the County when program year funding has been depleted. The Neighborhood Services Department and/or the Affordable Housing Advisory Committee, will review unsolicited applications for feasibility and send them to City Council for funding recommendation.

## **IX. Complaint Review Process**

The City will provide a written response to every complaint submitted in writing within 15 working days, if feasible. A complaint pertaining to the CDBG program, Con Plan, AAP, any plan amendments, and/or the performance report may be submitted for response to the Neighborhood Services Department. Staff will review the complaint and respond within 15 working days of receipt, if feasible. A written appeal of a response may be requested of the director who will review the appeal and provide a written response within 21 days, if feasible. The contact information is shown below.

City of Titusville  
Neighborhood Services Department  
725 S. DeLeon Avenue  
Titusville, Florida 32780  
(321) 567-3997  
(321) 268-5614(fax)

Citizens may, at any time during the complaint resolution process, contact HUD at the Jacksonville Field Office using the following address:

U.S. Department of Housing and Urban Development  
Charles Bennett Federal Building  
Office of Community Planning and Development  
400 West Bay Street; Suite 1015  
Jacksonville, Florida 32202-4410

## **X. State of Emergency Amendment**

During declared states of emergency, national pandemics, disaster events, and public health issues such as the coronavirus, it may be necessary to expedite substantial amendments to the CPP.

These expedited substantial amendments may include funding new activities and/or reprogramming funds to meet community needs resulting from the state of emergency or disaster event. As a result, the City may utilize CDBG or other HUD resources to meet these needs with a five-day public comment period instead of a 30-day public comment period, which is otherwise required for substantial amendments. It is anticipated that HUD would provide guidance in the event of a declared state of emergency.

Additionally, during a state of emergency or disaster event, in-person public hearings will not be required and virtual hearings will be acceptable. Please be advised that if virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or LEP persons will be made available to the greatest extent possible. During states of emergency or disaster events, advertisements and public notices may be made available solely on the City website.

### **Virtual Public Hearings**

Virtual public hearings are allowed under the following circumstances:

- National/local health authorities recommend social distancing and limiting public gatherings for public health reasons.
- Virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

## XI. Acronyms

Acronym	Definition
<b>AAP</b>	Annual Action Plan
<b>ADA</b>	Americans with Disabilities Act
<b>CAPER</b>	Consolidated Annual Performance and Evaluation Report
<b>CDBG</b>	Community Development Block Grant
<b>Con Plan</b>	Consolidated Plan for Housing and Community Development
<b>CPP</b>	Citizen Participation Plan
<b>HUD</b>	U.S. Department of Housing and Urban Development
<b>LEP</b>	Limited English Proficiency