



TOWN OF MOORESVILLE
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
ENTITLEMENT PROGRAM

2023-2027 Citizen Participation Plan

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INTRODUCTION

In compliance with 24 CFR 91.105, the Town of Mooresville is required to adopt a community wide Citizen Participation Plan to provide for and encourage resident participation in the Community Development Block Grant (CDBG) program. This plan is an essential element of the Town of Mooresville's present and future community development process and has been developed to comply with the regulations and requirements of the CDBG program as administered by the Department of Housing and Urban Development (HUD).

The Citizen Participation Plan sets forth the Town's policies and administration for the CDBG entitlement program with respect to the following Consolidated Plan documents:

- Five-Year Consolidated Plan (Con Plan)
- Annual Action Plan (AAP)
- Consolidated Annual Performance and Evaluation Report (CAPER)
- Analysis of Impediments to Fair Housing Choice (AI)

The primary goal of this Citizen Participation Plan is to provide all residents with adequate opportunities to participate in an advisory role in the planning, implementation, and assessment of the Town of Mooresville CDBG Program. The plan sets forth policies and procedures for participation, which are designed to maximize the opportunity for resident participation in the community development process. Special emphasis has been placed on encouraging participation by persons of low- and moderate-incomes, residents of blighted neighborhoods, and residents of areas where community development funds are utilized.

Residents are encouraged to participate in all phases of the CDBG program(s) and will be provided full access to program information. However, final responsibility and authority for the development and implementation of CDBG program will lie with the Town of Mooresville.

DEFINITIONS

Annual Action Plan: This document updates the Consolidated Plan on an annual basis and allocates one (1) year's funding (entitlement and program income) to specific projects and activities for the CDBG programs.

CAPER (Consolidated Annual Performance Evaluation Report): This document reports on the progress made in carrying out the Consolidated Plan and Annual Action Plans. Town of Mooresville prepares the report annually in accordance with 24 CFR Part 91.105.

CDBG (Community Development Block Grant Program): A U.S. Department of Housing and Urban Development (HUD) grant which provides for a variety of community development programs that benefit low- and moderate-income persons.

Citizen Participation Plan: The Citizen Participation Plan (CPP) sets forth Town of Mooresville's policies and procedures for resident participation in the development of the Community Development Block Grant (CDBG) program's goals and priorities. The CPP provides an opportunity for the community to work in partnership with the Town to identify needs and to allocate CDBG funds.

Consolidated Plan: The document that is submitted to HUD and serves as the planning document for the jurisdiction and application for CDBG funding. The document is developed in accordance with 24 CFR Part 91 and sets forth the priorities/strategies of the programs for a five-year period.

Low- and Moderate-Income Persons: An individual from a household with a total income that does not exceed eighty percent (80%) of the median household income for the area (Town of Mooresville) adjusted for family size. HUD calculates and publishes the income limits each year.

Program Year: The twelve (12) month period in which HUD funds are to be spent by the Town for eligible activities; usually beginning September 1 and ending August 30.

Public Hearing: A formal opportunity for a governing body or other entity to receive public opinion on subjects that may require action. Notices of public hearings are advertised through various forms of media.

Subrecipient: A public or private nonprofit agency, authority or organization, or a for-profit entity or local governments receiving CDBG funds from the Town or another subrecipient to undertake activities eligible for assistance. The term does not include contractors providing supplies, equipment, construction, or services subject to the procurement requirements in 2 CFR Part 200, as applicable.

Substantial Amendment: A substantial amendment is a change to the jurisdiction's planned or actual activities as published in the Consolidated Plan or Annual Action Plan. The Town has established and published in the Citizen Participation Plan thresholds to define what constitutes a substantial amendment.

Minor Amendment: A minor amendment is a change to the jurisdiction's previously adopted Consolidated Plan or Annual Action Plan that does not meet the thresholds to qualify as a Substantial Amendment.

PARTICIPATION

The primary objectives of the HUD programs covered by this Citizen Participation Plan are to improve communities and neighborhoods by providing decent housing, a suitable living environment, and economic opportunities.

It is the policy of the Town to encourage and facilitate the participation of all its residents, including minorities and non-English speaking persons and persons with disabilities in the planning processes for its HUD programs. In particular, the Citizen Participation Plan seeks to encourage the involvement of low- and moderate-income people, people living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and residents of

predominantly low- and moderate-income areas. The Town also encourages the participation of service providers, government agencies, and others in the development of all HUD required consolidated planning documents including the Five-Year Consolidated Plan, Annual Action Plans, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Reports (CAPER). They shall also make an effort to provide information to the Public Housing Authority (PHA) about activities related to the development of the consolidated plan so that the PHA can make this information available at the annual public hearing(s) required for the PHA Plan.

The primary purpose of the participation is to gather input for identifying community development needs, setting priorities, funding allocations, and program recommendations related to the consolidated planning process. Local officials will make every effort to involve residents in all phases of the development, implementation, and assessment of community development programs including, but not limited to, the following phases:

- A. Identification and assessment of housing and community development needs;
- B. Determination of CDBG project(s) and documentation;
- C. Development of the Five-Year Consolidated Plan and the Annual Action Plan (AAP), which serves as the application for funding submitted to HUD annually;
- D. Development of the Analysis of Impediments to Fair Housing Choice (AI);
- E. Changes and/or amendments to approved CDBG projects or Consolidated Plan, AAP and/or AI; and,
- F. Assessment of CDBG program performance.

All phases of the community development process will be conducted by local officials in an open manner. Residents of the Town of Mooresville are encouraged to participate at all levels and will be given access to program information during each phase of any CDBG program as outlined herein.

PUBLIC HEARINGS

The Town must conduct at least two (2) public hearings per year to obtain the views and comments of residents, service providers, government agencies, and other stakeholders regarding the Town's CDBG funded programs. The hearings will be conducted at a minimum of two (2) different stages of the program year—at least one (1) of these hearings must be held prior to the adoption of the proposed Consolidated Plan and/or Annual Action Plan. The second public hearing will be conducted in conjunction with the preparation of the Consolidated Annual Performance and Evaluation Report (CAPER) unless a public hearing was previously conducted during the program year for a different program component, such as a substantial amendment to the Consolidated Plan or Annual Action Plan, to meet the minimum. The public hearings generally address housing and community development needs, development of proposed activities, and the review of program performance.

Residents must be given adequate notice of all hearings and meetings through advertisements in one of the Town's adjudicated newspapers and/or other publications of general circulation, serving the community of affected residents. Public hearings will be advertised at least ten (10) days prior to the hearing date. Public notice shall indicate the date, time, place, and purpose of the hearing or meeting as well as disclose information that will contribute to the public's understanding of the issues to be discussed at the hearings. Notices may be published in alternate languages as appropriate and will be accessible to those with disabilities. Meeting location and access is described below.

Additional public hearings beyond the minimum may be held as deemed necessary by the Town of Mooresville in order to inform residents of community development project(s) and activities, and to solicit resident opinions and comments. All additional hearings shall comply with the requirements set forth in this plan.

ACCESS TO MEETINGS

All public hearings will be held at times and locations which will be accessible to all residents, especially persons of low and moderate incomes, and residents of blighted neighborhoods and CDBG project areas. Local officials may take additional steps to further promote participation by such groups, or to target program information to these persons should officials feel that such persons may otherwise be excluded, or should additional action be deemed necessary. Activities to promote additional participation may include posting of notices in blighted neighborhoods and in places frequented by low- and moderate-income persons and holding public hearings in low- and moderate-income neighborhoods or areas of existing or proposed CDBG project activities.

Public hearings and meetings will be scheduled for convenient times as determined by the Town of Mooresville. Public hearings may be held at any site which, in the opinion of the Town of Mooresville, provides adequate access for resident participation.

The locations of all public hearings shall be made accessible to persons with disabilities. The Town shall provide a sign language interpreter whenever they are notified in advance that one or more hearing impaired persons will be in attendance. The Town of Mooresville shall provide a qualified reader whenever they are notified in advance that one or more visually impaired persons will be in attendance. Additionally, the Town shall provide reasonable accommodation whenever they are notified in advance that one or more persons with mobility or development disabilities will be in attendance.

Local officials will undertake all reasonable actions necessary to allow limited English proficiency residents to participate in the community development process. Such actions may include the

provision of an interpreter and/or the provision of materials in the appropriate language or format for persons with Limited English Proficiency.

PUBLIC COMMENT

It is the policy of the Town to provide residents, service providers, government agencies, and other stakeholders a sufficient time period (not less than thirty [30] days) to review and comment on proposed Consolidated Plan, Annual Action Plans, and Substantial Amendments and not less than fifteen [15] days to review and comment on the Consolidated Annual Performance and Evaluation Reports (CAPER). The Town may publish a summary of the proposed Consolidated Plan in one or more newspapers of general circulation and make a copy of the full document available on the Town’s website or for pick up at the Town offices.

All public notices invite interested persons to submit comments. Contact information will be provided on all public notices, at public meetings, as well as on any of the documents or materials being considered. All comments will be reviewed and considered. Documents presented for approval by the Town Board of Commissioners will include a summary of all comments received during the public comment and a summary of comments not accepted and the reasons therefore.

The comment periods for plans and reports are listed below in the following table.

Plan/Report	Comment Period
Consolidated Plan and Annual Action Plan	30 calendar days
Substantial Amendments to Consolidated Plan and Annual Action Plan	30 calendar days
Analysis of Impediments	30 calendar days
Citizen Participation Plan	30 calendar days
Consolidated Annual Performance and Evaluation Report (CAPER)	15 calendar days

AMENDMENTS

Substantial Amendment

On occasion, it may be necessary for the Town to process a “substantial amendment” to the Five-Year Consolidated Plan or an Annual Action Plan to allow for new CDBG funded activities, modification of existing activities, or other program administrative actions.

Any proposed amendment that is considered a “substantial amendment” is subject to the Residents Participation process, requires formal action from the Board of Commissioners, and approval by HUD. A notice will be published in the local newspaper informing the public of a thirty (30) day comment period on the proposed substantial amendments. The Town will consider all comments or views received from the public concerning proposed substantial amendments in accordance with 24 CFR Part 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.

The Town of Mooresville is required by HUD [24 CFR Part 91.105(c)] to identify the criteria to be used in determining if a proposed action will be considered a Substantial Amendment. The following criteria will be used by the Town—if any one criterion applies, a substantial amendment will be required:

1. A new activity not previously listed and described in the Consolidated Plan/Annual Action Plan;
2. Amending the description of an existing activity in such a way that the newly described purpose, scope, location, or beneficiaries differ significantly from the original activity’s purpose, scope, location, or beneficiaries;
3. The cancellation of an existing activity listed and described in the Consolidated Plan/Annual Action Plan;
4. Changes in the use of CDBG funds between existing projects result in a minimum 50% increase or decrease of the total project budget.

During the Town’s administration of the HUD programs, it may become necessary to amend the Citizen Participation Plan. Any proposed amendment to the Citizen Participation Plan will be made available to the public for a thirty (30) day comment period and will require approval by the Board of Commissioners and HUD.

Minor Amendment

A minor amendment is a change to a previously adopted Con Plan or AAP Plan that does not meet the thresholds to qualify as a Substantial Amendment. A minor amendment may include:

1. Changes of a less than 50% increase or decrease in the funding of an activity necessary for preserving all the programs and activities identified in a Plan,
2. Correction of typographic errors in the original plan, or
3. Changes in contact information.

Minor amendments can also include a change in the method of distributing program funds. Examples of the method of distributing funds can include changes to the application process, limiting the size of grants, selection criteria, or allocation among funding priority categories. They can also include using funds from any program covered by the Consolidated Plan but not

in the current Annual Action Plan. Changes to the purpose, scope, location, or beneficiaries of an activity are also classified as a minor amendment.

Minor amendments require the approval of the Planning and Community Development Director or designated representative. Upon completion of a minor amendment, the public will be informed through the Town's website and HUD will be notified of the changes to the required documents. There is no 30-day public comment period required with minor amendments.

The Town may choose to submit a copy of each amendment to the AAP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the Planning and Community Development Director.

Citizen Participation Plan Amendments

From time to time, it may be necessary for the Town to amend the Citizen Participation Plan (CPP). A "Substantial Amendment" to the Citizen Participation Plan is defined by the Town to be:

1. A change in the definition of a Substantial Amendment for the Consolidated Plan or AAP; or
2. A change in the required public notification periods or public hearings; or
3. A change to the Town's policies or procedures regarding citizen participation, to such an extent it can no longer reasonably be construed as meeting the original intent approved by the Board of Commissioners and HUD per 24 CFR Part 91.105.

All other changes to the CPP will be considered Administrative Amendments and will be noted in the program files. Examples of Administrative Amendments may include, but are not limited to:

1. Any updates to contact and access information;
2. The modes and means of outreach utilized;
3. Amended Town policies referenced in this Plan;
4. Clarifications of terms used in the document;
5. Amended CFR's referenced in the Plan that do not substantially change the information included in the Plan.

In the event of a declared emergency, it may be necessary to reprogram funds to meet urgent community needs. These amendments may include funding new activities and/or the reprogramming of funds to meet urgent needs.

To comply with the national objective of meeting community development needs having a particular urgency, the project will alleviate existing conditions which:

1. Pose a serious and immediate threat to the health and welfare of the community;
2. Conditions are of recent origin or recently became urgent (approximately 18 months);
3. Conditions are unable to be financed by the Town on its own; and
4. Other funding resources are not available to completely carry out the activity.

In these situations, requirements related to public notice and the public comment period may be suspended for a limited and defined period of time at the discretion of the Town Manager.

PERFORMANCE REPORTS

Each fiscal year the Town of Mooresville is required to prepare and submit the Consolidated Annual Performance and Evaluation Report (CAPER) to HUD for the previous program year. The information compiled in this document is necessary to assess the progress on funding received by the Town and its subrecipients. Data collected in the compilation of the performance report will be used to supply information to HUD and the public on the accomplishments and services provided. The information on the report will include the number of people served, ethnicity, income category, objective and outcome, and type of service received.

Prior to submitting the CAPER to HUD, the final report will be available to residents for review and comment for a period of at least fifteen (15) days. Residents will be notified of the CAPER's availability through newspaper notification and email to interested parties for whom CDBG staff has an email address. The notification will be published the day the comment period begins for the CAPER. During the comment period, the CAPER will also be available on the Town's website at moorevillenc.gov and hard copies of the CAPER may be requested and sent by mail to all interested parties. All comments received in writing or orally at the public hearings will be considered. A summary of all resident or group comments along with a summary of those accepted and those not accepted, and the corresponding explanations will be included in the final CAPER.

ACCESS TO PROGRAM INFORMATION

The Town shall provide opportunities for residents, public agencies, and other interested parties with reasonable and timely access to information and records relating to the jurisdiction's Consolidated Plan, as well as the proposed, actual, and past use of funds covered by this Citizen Participation Plan. Before the adoption of the Consolidated Plan, the Town will make available to residents, public agencies, and other interested parties information that includes the amount of assistance the Town expects to receive, the range of activities that may be undertaken, the

estimated amount of funding that will benefit persons of low- and moderate-income, and the Town's plans to minimize displacement of persons and to assist any persons displaced. The Town shall make reasonable effort to assure that CDBG program information is available to all residents, especially those of low and moderate incomes and those residing in blighted or limited English proficiency neighborhoods and/or CDBG project areas.

Standard documents will be available for public review at the Town of Mooresville at 413 N. Main Street Mooresville NC 28115 by contacting Becca Bleich at 704-799-4020 or bbleich@mooresvillenc.gov. Copies can also be found on the Town website at mooresvillenc.gov. These documents will also be available in a form accessible to persons with disabilities upon request (this may include but is not necessarily limited to providing documents in Braille, electronic copies, or large print copies for the visually impaired). Information from CDBG project files shall be made available for examination and duplication, on request, during regular business hours. Standard CDBG program information and materials will also be made available and distributed to the public at the regularly scheduled public hearings as outlined in this Plan. The Town will also provide a reasonable number of free copies of the Consolidated Plan, Annual Action Plans, Substantial Amendments, and the Citizen Participation Plan to residents and groups that request them.

Materials to be made available shall include, but are not necessarily limited to, the Citizen Participation Plan, records of public hearings, mailings and promotional materials, prior CDBG Annual Action Plan, grant agreements, the environmental review record, procurement records, project design and construction specifications, labor standards materials, performance evaluation reports, proposed and approved CDBG Annual Action Plan for the current year, written comments or complaints received concerning the community development program along with the written responses from the town of Mooresville, and copies of the Federal and State rules, regulations, policies, requirements, and procedures governing the CDBG program.

In no case shall the Town of Mooresville disclose any information concerning the financial status of any program participant(s) which may be required to document program eligibility or benefit. Furthermore, the Town shall not disclose any information which may, in the opinion of the Town Manager, be deemed of a confidential nature.

TECHNICAL ASSISTANCE

Technical assistance is available as necessary to individual residents and resident organizations representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under the Consolidated Plan.

Technical assistance shall be provided on request and may include, but is not limited to: interpreting the CDBG program and its rules, regulations, procedures and/or requirements;

providing information and/or materials concerning the CDBG program; and assisting low and moderate income residents, and residents of blighted neighborhoods to develop statements of views, identify their needs, and to develop activities and proposals for projects which, when implemented, will resolve those needs.

COMPLAINTS

Residents or other interested parties may submit complaints related to the Town's Consolidated Plan, plan amendments, and performance reports. Complaints may be made in writing to Town of Mooresville Community Development Block Grant (CDBG) Coordinator ATTN: Becca Bleich at 413 N. Main Street Mooresville NC 28115. The Town of Mooresville will receive, log, and file all written complaints and grievances. A letter responding to each complaint or grievance will be written and sent to the party or parties from whom the complaint or grievance was received.

The complaining party should state the nature of the complaint, what prior efforts have been made to resolve the problem and any other pertinent information which would help staff determine a solution. All complaints will receive careful consideration and a timely, substantive written response will be provided within fifteen (15) working days or as soon as possible otherwise.

Records of all comments, objections, and/or complaints by residents concerning the Town's CDBG program and subsequent action take in response to those comments shall be maintained on file at the Town of Mooresville and shall be made available for public inspection upon request.

Residents may, at any time, contact HUD directly to register comments, objections, or complaints concerning the Town of Mooresville's AAP and/or CDBG projects. Residents are encouraged, however, to attempt to resolve any complaints at the local level as outlined above prior to contacting HUD.

All comments or complaints submitted to HUD shall be addressed in writing to:

U.S. Department of Housing and Urban Development
ATTN: Community and Planning Development Division
Asheville Building
1500 Pinecroft Road, Suite 401
Greensboro, NC 27407

TABLE A

CDBG PUBLIC NOTICE SUMMARY				
Document	Public Hearing	Hearing Notice	Public Comment Period	Notices in Public Areas
Consolidated Plan and/or Annual Action Plan	1 to 2	Run and display notice in newspapers at least 10 calendar days prior to each public hearing or at the beginning of the comment period, whichever is first.	30 calendar days	Post notice listing all meetings and/or hearings for the planning and adoption phase with enough detail for the public to recognize the purposes of the meetings, draft document locations, and dates for comment periods.
Substantial Amendments	None	N/A	30 calendar days	Post notice describing amendment items and location of drafts for public review and comment.
Minor Amendments	None	N/A	N/A	Post the Amendment on the Town's CDBG webpage
Consolidated Annual Performance and Evaluation Report (CAPER)	1*	Run and display notice in newspapers at least 10 calendar days prior to each public hearing or at the beginning of the comment period, whichever is first.	15 calendar days	Post notice identifying purpose of hearing, comment period, and location of drafts for public review and comment.
<ul style="list-style-type: none"> ➤ Display ads will be published in one or more of the local newspapers in key publications in the affected areas. ➤ Documents and drafts for public comments will be available on the Town's website. <p>* Only conducted if a public hearing was not previously conducted during the program year for a different program component, such as a substantial amendment to the Consolidated Plan or Annual Action Plan, or at the Town's discretion</p>				

TABLE B

SUMMARY OF SUBSTANTIAL AMENDMENT CRITERIA
1) Adding an activity not previously listed or described in the Consolidated Plan or Annual Action Plan.
2) Amending an existing activity so that the new purpose, scope, location, or beneficiaries differ significantly from the original activity.
3) The cancellation/deletion of an existing activity.
4) Major budget shifts between approved projects (+/- 50% of the total budget).