



# ORANGE COUNTY CITIZEN PARTICIPATION PLAN

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**Housing and Community  
Development Division**

525 East South Street  
Orlando, Florida 32801



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## **BACKGROUND**

Orange County's Citizen Participation Plan (CPP) is intended to establish the procedures and standards for citizen participation, in compliance with the U.S. Department of Housing and Urban Development's rule 24 CFR 91.105. All Orange County citizens, in particular low and moderate income persons and those living in slum and blighted areas, are encouraged to participate in the planning, implementation and assessment of its Community Development Block Grant, HOME Investment Partnerships and Emergency Solutions Grants programs.

Citizens are encouraged to participate in all stages of the planning process, including the identification of needs, setting of needs-related priorities, funding allocations, and implementation and evaluation of program activities designed to meet high-priority needs. Accordingly, the County makes provision for citizens to participate in the development of the Citizen Participation Plan, the Consolidated Plan, each related Annual Action Plan, and any substantial amendments to these plans. The County also makes provision for citizens to comment on the Consolidated Annual Performance Report that evaluates activities and projects implemented each year.

## **INTRODUCTION**

Orange County housing and community development programs are intended to develop viable urban communities with decent housing and a suitable living environment, and to expand economic opportunities, particularly for low- and moderate-income persons. Through its Housing and Community Development Division, the County implements activities aimed at meeting this commitment within the Unincorporated County area and in the participating municipalities.

To conduct desired activities, Orange County seeks federal funding from the U.S. Department of Housing and Urban Development (HUD) primarily through the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grants (ESG) programs. The Orange County Citizen Participation Plan is designed to gather input from persons with low- and moderate- incomes, persons living in slum and blighted areas, and in areas where funds are being used, or are proposed to be used, and from residents of primarily low- and moderate-income neighborhoods, as defined by HUD. The CPP also seeks input from persons who are homeless, members of minority groups, non-English speaking persons, persons with disabilities, and residents of public housing, by publicly soliciting individual comments and by contacting groups and agencies that represent and/or serve these populations.

Orange County recognizes the need for persons or groups affected by, or involved with community development projects under these programs to be given the opportunity to provide relevant and productive input to those tasked with program implementation and administration. Though Orange County does not administer public housing, it welcomes input from local community partners, such as the Orlando and Winter Park Housing Authorities, local public housing authorities (PHAs), and their residents, and from those agencies that provide assisted housing, health services, homeless services, and various public services. These partners can provide valuable insight on community needs and improvements. The County will host public meetings and provide timely notification and appropriate information concerning the conduct and purpose of these meetings to allow full public participation.

## DEFINITIONS

Consolidated Plan: A five-year strategic plan prepared as required by 24 CFR Part 91. It is the planning document of the County which describes identified needs and goals for community planning and development programs, and housing programs, during the designated five-year period. The plan is submitted to HUD on or before August 15 prior to the start of the first year of the new five-year period. It allows the County to apply for funding under the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Shelter Grants (ESG) programs.

Annual Action Plan: An annual action plan is prepared for each year of the five-year Consolidated Plan and specifies the amount of funding the County anticipates receiving from HUD, and related program income, under the CDBG, HOME and ESG programs. It describes the activities/projects to be undertaken to address the needs and priorities identified in the Consolidated Plan. It is submitted to HUD on or before August 15 of each year and serves as the annual application for funding for the grant year that begins October 1<sup>st</sup> and ends September 30<sup>th</sup>.

Consolidated Annual Performance and Evaluation Report (CAPER): This is the annual report that provides details of the County's performance in the administration of funding provided under the CDBG, HOME, and ESG programs during the previous grant year and tracks progress made towards five year goals established in the Consolidated Plan. It describes how funds were actually used and the extent to which funds benefitted low- and moderate-income persons. The CAPER is submitted within 90 days of the end of the grant year (by December 30<sup>th</sup>), and it is the basis for an evaluation of annual accomplishments and progress towards goals established in the Consolidated Plan.

Community Development Advisory Board (CDAB): The Advisory Board serves as a liaison between the Housing and Community Development Division and County residents. The Board represents both community wide and neighborhood interests. Orange County's six District Commissioners each appoint a CDAB member for a particular district and one CDAB member is appointed by the Mayor as an at large representative. The Board convenes regularly, and members are also encouraged to attend neighborhood organization meetings in the district they represent.

## PROVISION OF TECHNICAL ASSISTANCE

Orange County actively promotes neighborhood/community organizations and the regular conduct of neighborhood meetings by participating in meetings and maintaining ongoing contact with neighborhood organization representatives, especially in low- and moderate-income areas in need of community development assistance. Meetings give county representatives the opportunity to share information about the Citizen Participation Plan process. Citizens and community leaders can interact with and share concerns or recommendations with county representatives. Citizens may review old or new program issues or activities, and may solicit input on projects they are considering for their area, prior to submitting a proposal through their organization to the Housing and Community Development Division.

The Division staff will provide guidance in the interpretation of relevant federal regulations, strategies and objectives of the Consolidated Plan and Annual Action Plan, and referrals to

appropriate agencies and to HUD, if necessary. Orange County staff will provide technical assistance, to the greatest extent feasible, to all applicants or potential applicants and their constituents. Assistance may be in the form of one-on-one technical assistance to community leaders, or organizations and agencies that represent and/or assist minorities and disabled persons in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. Staff may also attend meetings to provide needed technical assistance and to respond to community questions and/or concerns, or both. Assistance with proposals is not a guarantee of funding.

## **ORANGE COUNTY CONSOLIDATED PLAN**

### **Public meetings prior to development of the Consolidated Plan**

Before developing the Consolidated Plan, the County will schedule at least one public hearing to:

- Provide citizens, public agencies and interested parties with a forum for input on housing and community development needs and priorities as part of the preparation of the Plan
- Discuss the amount of funding the County anticipates receiving from HUD for CDBG, ESG and HOME programs, and related program income, and the estimated amount of funding under these programs that will benefit persons of low and moderate income
- Examine the range of activities that may be implemented
- Give assurances of plans to minimize displacement of persons, assist any persons displaced, and specify the types and levels of assistance the County will make available (or require others to make available) to persons displaced, (even if no displacement is expected to occur) in keeping with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended
- Advise when and how the County will make this information available

### **Development of the Consolidated Plan**

Preparation of the Plan will begin after community and neighborhood needs have been identified. The County will provide opportunity for citizen input on needs and priorities by such means as focus group sessions, a public survey at community locations and/or a request for input/comments on the County's website, participation in community meetings, and by other means as feasible and appropriate.

Prior to adopting the Consolidated Plan, Orange County will make available to citizens, public agencies, and other interested parties information which includes the amount of assistance the County expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income.

Orange County will ensure that citizens, public agencies, and other interested parties are afforded a reasonable opportunity to examine the contents of the proposed Consolidated Plan and to submit comments regarding the Plan through the following actions.

- **Publication of Plan Summary:** A summary of the proposed Consolidated Plan, in English and Spanish, will be published in the Orlando Sentinel/El Sentinel (English and Spanish) or similar newspaper of general circulation, and in newspapers and/or newsletters or other publications directed to, or reaching minorities where available and feasible. It will also be published on the County's website at <http://www.orangecountyfl.net/NeighborsHousing/CommunityDevelopment.aspx>, and to the extent possible, on the website/facility notice board of non-profit public service providers, including those serving persons with disabilities. It will be provided to community partners, particularly those in or serving target areas and low- and moderate-income areas of the county, and faith based, business and other agencies/organizations and associations, as appropriate. The published summary will describe the contents and purpose of the Consolidated Plan, funding anticipated, proposed activities, and locations where copies of the entire proposed Consolidated Plan may be examined by the public.
- **Public Review and Comment Period:** A public review and comment period of not less than thirty (30) days will be established for the receipt of comments from citizens on the proposed Consolidated Plan. This period will be specified in the public notice at the time the summary of the plan is published.
- **Copies of Proposed Consolidated Plan:** A copy of the proposed plan will be available for review at the Orange County Public Library, and at the Orange County Housing and Community Development Office, including its Planning and Development, Housing Development and Section 8 offices. The proposed Consolidated Plan will be posted on the <http://www.orangecountyfl.net/NeighborsHousing/CommunityDevelopment.aspx>, the County's website, and, to the extent possible, at such public places and other locations throughout the county that will facilitate examination by the general public. Upon request, the County will also make a reasonable number of copies of the Plan available to citizens and groups that request it, including copies to persons who are homebound. Locations and addresses of locations where the plan will be available are as follows:

***Orange County Housing and Community Development Division***  
 525 E. South St.  
 Orlando, FL 32801

***Orange County Public Library***  
 101 E. Central Blvd.  
 Orlando, FL 32801

***Orange County Community Centers***  
 [Various - Located in or serving current Target Areas and other Low/Mod Income Areas]

## **Displacement**

In implementing its Consolidated Plan activities, the Orange County will make every effort possible to avoid or minimize the effects of displacement of persons affected by any CDBG, HOME, and ESG funded activities. If an involuntary displacement should occur, the County will provide housing referral assistance and, if required, make relocation payments in accordance with local, state and federal law.

## **Public Meetings – Consolidated Plan**

Orange County will hold at least two (2) public meetings annually to obtain citizen input and to respond to questions regarding program activities. These public meetings will be conducted at different times during the program year. These meetings will, together, address housing and community development needs, discuss proposed activities, and review program performance.

An initial public meeting will be held during the development of the Action Plan. A second public meeting will be held near the end of the fifteen (15) day public review period of the CAPER. Every five years, when the Consolidated Plan is being developed, the County will hold an additional public meeting before the proposed Consolidated Plan is published for review in order to obtain the input of citizens on housing and community development needs. These public meetings are intended to meet the guidelines required by the U.S. Department of Housing and Urban Development established in 24 CFR 91.105(e)1.

The public meeting procedures are outlined below.

- **Notice of Public Meetings:** Orange County will make every effort to ensure that the notice of these public meetings is published at least fifteen (15) days in advance of the meetings in the Orlando Sentinel/El Sentinel (English and Spanish) or similar newspaper(s) of general circulation, and in minority and non-English language newspapers, where available and feasible. Notice of these public meetings will include the time, date, place and procedures of these meetings as well as topics to be considered. Notices will encourage all interested parties to participate and give their comments and input on the proposed plans being developed.
- **Time and Location of Meetings:** Public meetings will be held at times and locations convenient to potential and actual beneficiaries. Unless otherwise noted, public hearings will be held at 6:00 p.m. at a central, accessible location.
- **Non-English Speaking Persons:** Orange County will make a translator available at public meetings where a significant number of non-English speaking persons or interest groups notify the staff at least two (2) business days prior to the public meeting and request appropriate translation services.
- **Special Accommodations for Persons with Disabilities:** Orange County staff will make special arrangements for the attendance of persons with disabilities who notify the County at least two (2) business days prior to the public meeting and identify and request the special accommodations needed.

## **Amendments to the Consolidated Plan/Annual Action Plan**

### **a) Substantial Amendments to the Consolidated Plan/Annual Action Plan**

Substantial amendments to the Consolidated Plan must conform to 24 CFR 91.505. Orange County will consider the following changes to be substantial amendments to the Consolidated Plan, and the Annual Action Plan, and subject to the citizen participation process, in accordance with its Citizen Participation Plan and 24 CFR 91.505. A substantial change is defined as one of the following occurrences:

1. A change that adds a new priority;



2. A change that adds a new activity;
3. A change that cancels an activity that involves more than 25% of the fiscal year's funding allocation;
4. A change in the project location to one beyond the original census tract and block group; or
5. A change in the scope of an activity as it relates to beneficiaries, basic eligibility or changes in purpose/stated objectives of an activity.

The procedures that must be followed when processing a substantial amendment to the Consolidated Plan are outlined below.

- **Public Notice:** A notice concerning the availability of the proposed substantial amendment will be published in the Orlando Sentinel/El Sentinel or other newspaper of general circulation, and it will establish a thirty (30) day public review and comment period. The public notice will encourage all interested parties to participate, and solicit their comments and input on the proposed substantial amendment. Upon request, the County will also make copies of the proposed substantial amendment available to citizens and groups.
- **Public Comments:** Orange County will consider any comments or views of citizens received in writing, or orally at public meetings, in preparing the final substantial amendment. Questions (including requests to review supporting documentation) or written comments regarding the proposed Amendment should be directed to the Orange County Housing and Community Development Division.
- **Expedited Procedures and their Applicability:** Disaster or emergency events may require expedited procedures for processing substantial amendments to the Consolidated Plan and/or the Annual Action Plan. These disaster or emergency events may include, but are not limited to, man-made disasters, natural disasters, acts of terrorism, or public health crises such as the recent coronavirus disease 2019 (COVID-19) pandemic. Expedited substantial amendments to fund new activities and/or reprogram funds (including canceling activities) may be required to meet the housing and community development needs resulting from a disaster or public health emergency. Therefore, Orange County may utilize eligible funds to address these needs following a five (5) day public comment period instead of a thirty (30) day comment period when provided a waiver by HUD. For CDBG funding under FY 2019-2020 and *The Coronavirus Aid, Relief and Economic Security Act* (CARES Act), Orange County may provide a five (5) day notice of a proposed change for public comments, as allowed under the HUD waiver. A special ESG Program funding under the CARES Act (referred to as ESG-CV) is not subject to the consultation and citizen participation requirements that would otherwise apply to the ESG funds. Instead, Orange County must publish how its ESG-CV allocation will be used, at a minimum, on the Internet at its website or through other electronic media.
- **Virtual Meetings:** In the event that Orange County is closed to the public, or has a declared emergency, or for as long as public health authorities recommend social distancing or limited in-person public gatherings for public health reasons, virtual public meetings and hearings may be used to fulfill any public hearing requirements. Orange County will continue to provide reasonable notification, public comment opportunity and access for citizens, timely response from local officials to all citizen questions and issues, and public access to all questions and responses (at request). Public comment



opportunities and accommodations for persons with disabilities or persons with limited English proficiency will be made available to the greatest extent possible.

- Submission to the Orange County Board of County Commissioners for approval
- Submission to HUD for final approval through IDIS

Substantial amendment(s) must be submitted and reviewed by HUD prior to completion of the Consolidated Annual Performance and Evaluation Report (CAPER). The amendment(s) should first be incorporated into the Consolidated Plan and, subsequently, into the Annual Action Plan.

#### **b) Minor Amendments to the Consolidated Plan**

Orange County will consider the following changes to be minor amendments to the Consolidated Plan, and the Annual Action Plan, and subject to the citizen participation process, in accordance with its Citizen Participation Plan and 24 CFR 91.505. A minor amendment is defined as:

- A change that cancels an activity that involves less than 25% of the fiscal year's funding allocation.

Minor amendments will not require public notices or submission to the Orange County Board of County Commissioners; however, these amendments must be submitted through IDIS and reviewed by HUD prior to completion of the Consolidated Annual Performance and Evaluation Report (CAPER). Minor amendments should first be incorporated into the Consolidated Plan and, subsequently, into the Annual Action Plan.

### **CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)**

On an annual basis, Orange County will review and report, in a form prescribed by HUD, on the progress it has made in carrying out its five year strategic plan and Annual Action Plan. This Consolidated Annual Performance and Evaluation Report (CAPER) will include a description of the resources made available, the utilization of available resources, the geographic distribution and location of funded projects, households and persons assisted (including racial and ethnic status of persons assisted), actions taken to affirmatively further fair housing, and other actions indicated in the five year strategic Plan and the Annual Action Plan. As required, the CAPER will be submitted to HUD within ninety (90) days after the close of the County's program year.

#### **Public Notice and Comment Period – CAPER**

To inform the public of the availability of the CAPER, Orange County will publish a notice in the Orlando Sentinel/El Sentinel or other newspaper of general circulation, and will establish a fifteen (15) day public review and comment period. The notice will encourage all interested parties to participate and provide their comments and input on the CAPER. The notice will also provide information on locations where copies of the entire proposed CAPER report may be examined by the public. Upon request, the County will also make free copies of the proposed CAPER report available to citizens and groups.

A public review and comment period of not less than fifteen (15) days will be established for the receipt of comments from citizens and all interested parties on the proposed CAPER report.

### **Public Meeting – CAPER**

Orange County will conduct a public meeting to provide an opportunity for citizens to comment and ask questions regarding the CAPER. This meeting will follow the public review and comment period, noted above.

Notice of this public meeting will be published at least fifteen (15) days in advance of the meeting in the Orlando Sentinel/El Sentinel (English and Spanish) or similar newspaper of general circulation, and where available and feasible, in newspapers and/or newsletters or other publications directed to, or reaching minorities. It will also be published on the County's website at <http://www.orangecountyfl.net/NeighborsHousing/CommunityDevelopment.aspx>. The notice will describe the contents and purpose of the CAPER and locations where copies of the entire CAPER may be examined by the public.

Orange County will consider any comments or views of citizens received in writing in preparing the annual CAPER report. A summary of these comments or views will be attached to the annual CAPER report.

## **PUBLIC ACCESS TO MEETINGS AND RECORDS**

### **Public Meetings**

Orange County commits to provide its citizens with reasonable and timely access to public meetings regarding the Consolidated Plan and related Annual Action Plans and any amendments thereto, and also to the Consolidated Annual Performance Report.

### **Document Availability**

The Consolidated Plan, any amendments thereto, the annual Action Plans and the CAPER will be made available and accessible to the public. Public access includes the availability of materials in a form accessible to persons with disabilities, upon request. In addition, English-Spanish bilingual staff will be available to assist non-English speaking residents in accessing this information. These plans will be made available for public inspection and review during regular business hours at the Orange County Housing and Community Development Division, located at 525 E. South St., Orlando, FL 32801.

### **Access to Records and Information**

The public will be provided with reasonable access to records, subject to all local, state and federal laws regarding privacy and obligations of confidentiality, during the public comment periods. Interested persons and groups, including those that are or may be affected, will have the opportunity to receive information, review and submit comments on any proposed submission concerning funds available and the estimated amount expected to benefit low- and moderate-income residents.

## **ADDITIONAL PUBLIC PARTICIPATION TOOLS**

In addition to the strategies proposed in this document, Orange County will continue implementing other outreach tools in order to improve citizen participation. With regards to Public Notices, documents submitted for review may be summarized in the form of flyers or brochures and placed in public libraries and/or community centers in low-income areas for easy accessibility; these summaries will also be published on the County's website. Public Notices may be provided in languages other than English and Spanish, if needed. Furthermore, advertisement will also be done through Spanish radio channels, when necessary, in order to reach larger audiences and improve access to information for Non-English speakers.

Email announcements will be shared with agencies and community leaders when documents become available for public review. Orange County will continue consultations with other local governments and jurisdictions in the region to discuss issues of regional importance, such as affordable housing and homelessness.

In an effort to reach out to various groups within the County and to ensure these public participation tools are put into place, Orange County staff will host topic-oriented stakeholder sessions and continue to be part of the Florida Community Development Association (FCDA). To reduce language barriers and allow for better communication, staff who are Spanish speaking, or who speak other languages, such as Haitian Creole or Russian, may be available to assist the public upon request.

## **COMPLAINTS AND GRIEVANCE PROCEDURES**

Orange County will provide a written response to all complaints received in writing, or orally at public hearings, if any, concerning the Consolidated Plan, the Annual Action Plan, and any amendment to these plans, or to the CAPER. Responses will be provided within fifteen (15) working days, where practicable. A record of complaints received will include the nature of the complaint, referrals made, and the final disposition. This record will be included with the final document submitted to HUD.

Comments and/or complaints should be submitted to the Housing and Community Development Division, which administers federal funding from the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG) programs (and other programs that may be administered on behalf of HUD from time to time as deemed necessary). The City of Orlando administers funding for the area under the HOPWA program. Comments and/or complaints should be submitted in writing, by mail, or fax to:

The Manager, Orange County Housing and Community Development Division  
525 E. South St., Orlando, FL 32801 Tel: 407-836-5191 Fax: 407-836-5193

## **ACCESS TO CITIZEN PARTICIPATION PLAN**

Orange County will provide citizens with a reasonable opportunity to comment on this Citizen Participation Plan and on any substantial amendments thereto. This Citizen Participation Plan and any amendments thereto, will be maintained as public documents and available to any

member of the public. This Citizen Participation Plan will be made available in a format accessible to persons with disabilities and non-English speaking persons, upon request.

The Citizen Participation Plan, or any proposed amendments thereto, will be made available to the public, including various social service providers and groups that represent or serve persons with low and moderate incomes, persons living in slum and blighted areas and in areas where CDBG funds are proposed to be used, persons with special needs, residents of public housing, persons who are homeless, members of minority groups, non-English speaking persons, and persons with disabilities. The Plan will be posted on the County's website at <http://www.orangecountyfl.net/NeighborsHousing/CommunityDevelopment.aspx>, distributed via email, and advertised in the Orlando Sentinel or other newspaper of general circulation.

Copies of this Citizen Participation Plan and any amendment thereto, will be kept on file at Orange County Housing and Community Development Division at 525 E. South St., Orlando, FL 32801, and will be made available for public inspection and review during regular business hours.

