

## **GEORGIA CITIZEN PARTICIPATION PLAN In Accordance with Public Law 117-328**

In accordance with Public Law 117-328, this document was prepared by DCA to meet the requirements of the CDBG-DR funding following a series of tornadoes (DR-4685) in January 2023. The Citizen Participation Plan reflects the alternative requirements as specified by the U.S. Department of Housing and Urban Development (HUD) in the Federal Register 88 FR 82982 and any amendments, as applicable. DCA will ensure the Citizen Participation Plan meets the requirements of 24 CFR 91.115 and takes into consideration any waivers and alternatives made available by HUD.

The Citizen Participation Plan is designed to ensure citizens of the State of Georgia, particularly persons of low and moderate income residing in areas where it is proposed that such funds are to be used, are provided the opportunity and encouraged to participate in the planning and implementation of CDBG-DR activities.

### **Outreach Summary**

In anticipation of receiving CDBG-DR funds, DCA incorporated specific citizen participation requirements into its CDBG-DR Action Plan. This plan outlines how DCA intends to meet these requirements. The objectives of DCA's outreach activities are to ensure that all citizens are aware of the CDBG Disaster Recovery funding and the planning process and have the opportunity to comment on or suggest proposed uses for the funds.

The State of Georgia will ensure all HUD requirements for citizen engagement are met. DCA will hold meetings that are open to elected and appointed officials from all FEMA Individual Assistance (IA) and Public Assistance (PA) declared counties as a result of the January 2023 tornadoes disaster. DCA will initiate outreach through the following mechanisms: conference calls, webinars, emails, and in-person meetings. DCA will also host phone calls and communicate through email with local elected officials to ensure feedback is consistent and continual. DCA will also distribute periodic CDBG-DR status updates produced by the State's CDBG-DR Director, Project Manager, and/or Coordinator and facilitate community meetings with local officials and staff to discuss program guidelines, planning, and to receive feedback from local jurisdictions.

### **Fair Housing**

DCA is committed to furthering fair housing through established affirmative marketing and outreach activities. DCA will take steps based on the Fair Housing Act of 1968 to reduce disparities in housing choice, access, and opportunities based on protected class (e.g., race, color, religion, familial status, sex, national origin or disability). Toward achieving that objective, DCA will ensure that its outreach, communication and public engagement efforts are comprehensive in order to reach as many impacted citizens as possible.

DCA will make every attempt to hold all virtual, in-person, and hybrid (a combination of both virtual and in-person) hearings at a time and location convenient to potential and actual

beneficiaries. Appropriate steps will also be taken to ensure effective communication with applicants, beneficiaries, and members of the public. This includes making accommodations for persons with disabilities and appropriate auxiliary aids and services as required by 24 CFR 8.6. The meetings will be held in an accessible location, and sign language interpreters will be made available upon advance request. DCA will also provide interpretation services for non-English speaking residents at the meetings upon advance request. Stakeholders and citizens will be notified of the public hearing at least 10 days before they are held.

DCA will require local government subrecipients and procured vendors to certify that they will Affirmatively Further Fair Housing (AFFH). This section of the Citizen Participation Plan outlines various options available in meeting this grant obligation. While the law does not specify what type of action subrecipients or vendors must take, it is clear that by virtue of receipt of CDBG funds, they are obligated to take some sort of action to affirmatively further the national goal of fair housing. DCA will require subrecipients and vendors to document and keep record of fair housing activities.

Copies of brochures provided to participants, minutes of meetings where fair housing is discussed, and any other records must be available for review by the DCA CDBG-DR Program Representative(s). The following is an example of possible fair housing activities. Although not inclusive, its purpose is to suggest a range of activities that would satisfy the subrecipient's obligation. Technical assistance would be available from DCA if subrecipients or vendors desired to implement any of these suggestions. DCA will monitor subrecipients to ensure AFFH obligations are met.

#### Possible Actions to Affirmatively Further Fair Housing:

- Analyze any impediments to fair housing choice which may exist in your community. Contact HUD or DCA for an analysis of any fair housing complaints from the area.
- Review local zoning laws and procedures to determine whether they contribute to, or detract from, progress in fair housing. Establish a collection of zoning and land use planning material to have available for the use of local fair housing groups as well as subrecipient or vendor staff.
- Provide funding for local fair housing groups (eligible under the CDBG-DR Program) or provide financial or technical assistance to citizens wishing to organize such a group.
- Adopt a local Fair Housing Ordinance or a resolution supporting the state and/or federal law.
- Distribute brochures outlining fair housing law to persons attending community meetings or CDBG Public Hearings.
- Post a fair housing poster at City Hall or Courthouse.
- Require owners of rental property receiving CDBG-DR assisted rehabilitation loans to sign fair housing agreements as a condition of receiving assistance.
- Develop an active public information and educational campaign to promote fair housing awareness in the community.
- Include a discussion of fair housing in public meeting agendas.
- Provide persons relocated to new housing with fair housing information and referrals.

#### **Email Updates**

In order to distribute the status updates to elected and appointed officials, local government employees from the impacted counties, and private citizens, the CDBG-DR team worked with DCA's Marketing and Communications Team to create an email-sign up page located on the left-hand side of the CDBG-DR webpage (<https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-recovery>). Participants have the option to sign up for one or multiple lists including a specific list for the January 2023 tornadoes. Participants are also able to select an option to receive

communication in Spanish.

### **Public Notice and Comment Period to Review Draft Action Plan**

Prior to finalizing the CDBG-DR Action Plan, DCA will make available to stakeholders, citizens, public agencies, and other interested parties' information that includes the amount of assistance DCA expects to receive and the range of activities that may qualify, including the estimated amount that will benefit persons of low and moderate income.

DCA will provide reasonable public notice and seek feedback for the development of the CDBG-DR Action Plan through emails, website postings, and public meetings. DCA will publish the draft CDBG- DR Action Plan and the time period for public comment on the DCA CDBG-DR Website. The website is linked below:

<https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-recovery>

For those who cannot access the draft CDBG-DR Action Plan online, a copy will be made available at DCA Headquarters. Citizens who wish to participate in the planning process are encouraged to contact their local government or reach out to DCA via email at CDBG-DR@dca.ga.gov.

### **Development of CDBG-DR Action Plan**

The State is developing a Disaster Recovery Action Plan that will include:

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

### **Amendments to the Action Plan**

As additional information becomes available and programs evolve through the grant administration process, amendments will be made to the Action Plan in accordance with 88 FR 82982. Updates to the plan may be substantial or non-substantial. Program changes that result in a Substantial Amendment are:

- Addition or deletion of any allowable activity described in the approved Action Plan
- A funding allocation or re-allocation of \$3 million or more
- A change in program benefit, planned beneficiaries, or eligibility

Substantial Amendment(s) will be posted for public comment for a minimum of 30 days. DCA and/or MID area local governments will notify affected citizens through electronic mailings, press releases on websites, and/or social media. A summary of all comments received, and responses provided will be included in the appendices of the final Substantial Amendment submitted to HUD for approval. The HUD-Approved Substantial Amendment will be posted to DCA's public website, in English as well as in Spanish, Chinese, Korean, and Vietnamese.

Written comments on the initial 2023 CDBG-DR Action Plan or subsequent substantial amendments to the plan may be submitted to DCA via email at CDBG-DR@dca.ga.gov or
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mailed to the following address by 5:00 PM EST on the pre-approved date as set forth in the applicable FRN:

Georgia Department of Community Affairs  
Attention: CDBG-DR  
60 Executive Park South, NE Atlanta, Georgia 30329

For non-substantial amendments, DCA will notify HUD but not post for public comment. Each amendment, substantial or not, will be posted to DCA's CDBG-DR public website, not replacing, but in addition to all previous versions of the plan.

### **Citizen Complaints Process and Procedures**

Citizens may file a written complaint or appeal through the CDBG-DR email at [CDBG-DR@dca.ga.gov](mailto:CDBG-DR@dca.ga.gov) or submit via mail to:

Georgia Department of Community Affairs  
Attention: CDBG-DR  
60 Executive Park South, NE  
Atlanta, GA 30329

DCA's goal is to attempt to resolve all complaints in a manner that is both sensitive to the complainants' concerns and achieves a fair result. DCA will make every effort to provide a timely written response within 15 working days of the receipt of the complaint, where practicable.

Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)).

### **Performance Reporting**

In accordance with HUD requirements DCA will submit a Quarterly Performance Report (QPR) through the Disaster Recovery Grant Reporting (DRGR) system no later than 30 days after the end of each calendar quarter. QPR's will be posted to the DCA CDBG-DR public website within three (3) days of submission to HUD each quarter until all funds have been expended and all expenditures have been reported.

Each QPR will include information about the uses of funds in activities identified in the Action Plan, as entered in the DRGR reporting system. This includes, but is not limited to:

- Project name, activity, location, and national objective
- Funds budgeted, obligated, drawn down, and expended
- The funding source and total amount of any non-CDBG-DR funds to be expended on each activity
- Beginning and actual completion dates of completed activities
- Achieved performance outcomes such as number of housing units completed or number of low- and moderate-income persons benefiting
- The race and ethnicity of persons assisted under direct-benefit activities
- Amount of funding expended for each contractor identified in the Action Plan
- Efforts to affirmatively further fair housing made by DCA, Subrecipients, and procured vendors

### **Limited English Proficiency (LEP)**

DCA is committed to providing all citizens with equal access to information about CDBG-DR, including persons with disabilities and limited English proficiency (LEP). DCA follows HUD's

regulation, 24 CFR Part 1, “Non-Discrimination in Federally Assisted Programs of the Department of Housing and Urban Development-Effectuation of Title VI of the Civil Rights Act of 1964,” which requires all recipients of federal financial assistance from HUD to provide meaningful access to LEP persons.

Persons who do not speak English as their primary language and who have limited ability to read, write, speak, or understand English may be entitled to language assistance with respect to a service, benefit, or encounter. Where a significant number of non-English speakers can be reasonably expected to participate in a virtual, in-person, or hybrid public hearing or public comment periods, the following accommodations will be made upon request:

- Materials to be handed out will be translated into the appropriate language;
- Citizen comments in a language other than English will be translated; and
- Translator options will be available.

DCA will take reasonable steps to ensure that LEP persons are informed of the availability of the Action Plan and have the opportunity to provide comments. The Action Plans and all amendments (substantial and non-substantial) will be translated into Spanish, Chinese, Korean, and Vietnamese and posted on Georgia’s CDBG-DR webpage at:

<https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-recovery>

## DCA Website Accessibility

DCA’s website can be translated into many languages. Below is a screenshot from DCA’s website as it is translated into Spanish.

The screenshot displays the Spanish version of the DCA website. On the left, there are three vertical panels with icons and text: 'ASISTENCIA DEL GOBIERNO LOCAL' (Local Government Assistance), 'DESARROLLO COMUNITARIO Y ECONÓMICO' (Community and Economic Development), and 'VIVIENDA SEGURA Y ASEQUIBLE' (Safe and Affordable Housing). Below these is a registration form titled '¡Regístrese para recibir actualizaciones de CDBG-DR!' (Register to receive CDBG-DR updates!). The form includes fields for email, name, and address, and a list of program categories to subscribe to.

The main content area features the title 'Programa de Recuperación por Desastre en Bloque de Desarrollo Comunitario (CDBG-DR)'. It includes a 'CONTACTO' section with the email 'CDBG-DR@dca.ga.gov' and a 'Disaster relief' image. The text describes the program's purpose and provides information on funding availability and eligibility. A warning message states: 'LAS SOLICITUDES PARA EL PROGRAMA CDBG-DR DEL DCA NO SE ESTÁN RECIBIENDO EN ESTE MOMENTO.' (Applications for the DCA CDBG-DR program are not being received at this time.)

At the bottom, there are four icons representing different program areas: 'Asignación de necesidades insatisfechas 2017' (2017 Unmet Needs Allocation), 'Asignación de mitigación 2017' (2017 Mitigation Allocation), 'Asignación del huracán Michael' (Hurricane Michael Allocation), and 'Contratos' (Contracts).

## Section 508 Accessibility

DCA's website complies with Section 508 of the Rehabilitation Act of 1973, making content accessible to people with disabilities. Section 508 requires that anyone with disabilities must be able to access and use information and data on a website, comparable to the way people without disabilities can get that information and data, unless it would cause our agency an undue burden.

If you use assistive technology (such as a screen reader, Braille reader, etc.) and have problems accessing information on our website, please contact [CDBG-DR@dca.ga.gov](mailto:CDBG-DR@dca.ga.gov) and tell us about your problem. Be sure to include the URL (web address) of the material you tried to access and your contact information. We will try to provide the information you are seeking.

## Section 504 Accessibility

DCA will work to eliminate disparities in the discrimination of individuals based on their disability in accordance with Section 504 of the Rehabilitation Act (24 CFR part 8, subpart C). Toward achieving that objective, DCA will ensure that its outreach, communication, and public engagement efforts are comprehensive and accessible in order to reach as many impacted citizens as possible.

DCA will hold all in-person hearings in facilities that are physically accessible to persons with disabilities. Where physical accessibility is not achievable, DCA will prioritize alternative methods of product or information delivery that offer programs and activities to qualified individuals with disabilities in the most integrated setting appropriate as outlined in 88 FR 82982. When conducting a virtual or hybrid hearing, DCA will allow questions in real time, with answers coming directly from DCA representatives to all attendees.

## Provision of Language Access Services

All programs with direct contact with the public are responsible for providing written or oral language services. "I Speak" cards are used by all staff who may have direct interaction with LEP individuals to identify language needs and begin the provision of access services.

## Plan for Providing Interpreters and Spoken Translation

For oral encounters, program staff have access to three contracted translation service providers that can interpret program information into the applicant's native language:

Providers	Services Provided	Phone	Email	Website
Interpreters Unlimited	In person Interpretation: Region 3	800-726-9891	N/A	N/A
LionBridge Technologies	Telephonic Interpretation: Statewide	❖ 978-964-9550 (Account Set-up) ❖ 800-444-6627	N/A	N/A
Ad Astra	Spoken Language Interpreting: In person Region 1,2,4, 5	❖ 301-408-4242, option 2 ❖ 202-302-3379: Nights/weekend/holidays	<a href="mailto:intergreting@ad-astrainc.com">intergreting@ad-astrainc.com</a>	<a href="http://www.scheduleinterpreter.com/ad-astra">www.scheduleinterpreter.com/ad-astra</a>
	Document	301-408-4242, option 4	<a href="mailto:translation@ad-">translation@ad-</a>	<a href="https://portal.ad-">https://portal.ad-</a>



	Translation: Statewide		<a href="http://astrainc.com">astrainc.com</a>	<a href="http://astrainc.com/pages/UTF8/login.jsq">astrainc.com/pages/UTF8/login.jsq</a>
	Deaf and Hard of Hearing Services	301-408-4242, option 3	<a href="mailto:deaf.hoh@ad-astrainc.com">deaf.hoh@ad-astrainc.com</a>	<a href="http://www.scheduleinterpreter.com/ad-astra">www.scheduleinterpreter.com/ad-astra</a>

The program applicant will identify him/herself as an LEP individual. By way of this designation, public-facing program staff are instructed to call a toll-free number and assist applicants with the help of the telephone operator and interpreters available through this service.

DCA will partner with organizations to develop additional translating resources for written materials.

### **Plan for Providing Language Access Services to Meeting Participants and Attendees**

DCA, Subrecipients, and procured vendors will leverage the contracted translation services or bilingual staff to provide interpretation services as needed for all meetings including, virtual, in-person, and hybrid, related to program eligibility determinations. DCA is committed to providing interpreters for large, medium, small, and one-on-one DCA meetings with any LEP individuals or organizational representatives as needed and as appropriate.

DCA will include a statement in its meeting notices indicating that 1) DCA is prepared to provide appropriate language services for LEP individuals and 2) requesting that the respondent identify any language services needed within a specified period of time, including which language(s) such services are required.

DCA's ability to provide an in-person interpreter upon request is limited by available resources and the scheduling availability of the translation service(s). DCA will provide interpretation services in a meeting in the following manner:

- If the meeting is small (less than 10 people), telephone interpreter services will be provided.
- If the meeting is medium (11-20 people) or large (21 or more people), an in-person interpreter will be provided upon request.

When the meeting is off-site and/or open to the public, DCA will include the sentence, "Translation of the notice and interpretation services for this event are available upon request" in the following languages: English, Spanish, Chinese, Korean, and Vietnamese.