



## Collier County, Florida 2021 – 2025 Citizen Participation Plan

The 2021 - 2025 Citizen Participation Plan details the public participation and community involvement activities related to the development of the Consolidated Plan, Assessment of Fair Housing, Annual Action Plan, Performance Reports, and future amendments of such plans.

February 9, 2021

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## INTRODUCTION

In 2001, Collier County became entitled to receive annual grant funding from the federal Community Development Block Grant (CDBG)/HOME and Emergency Solutions Grant (ESG) program. As an entitlement jurisdiction, the County receives the CDBG funding directly from Housing and Urban Development (HUD) and administers the grant, including ensuring the funds are used according to the Code of Federal Regulations (CFR) and the associated plans, reports and certifications are completed on time and accurately.

Each entitlement jurisdiction must complete a Consolidated Plan at least once every five years (24 CFR § 91.15). The Consolidated Plan is a strategic plan to examine the housing and community development needs of a jurisdiction, set priorities for HUD grant monies and establish an action plan for meeting current and future needs. Each Consolidated Plan is also required to have a strategy for citizen participation in the Consolidated Planning process (24 CFR Part 91.105).

HUD requires entitlement jurisdictions to submit an Annual Action Plan (AAP) by August of each year to receive the CDBG/HOME/ESG funding (24 CFR § 91.15). The Annual Action Plan serves in part, as the County's application to HUD for the following year's funding. The AAP includes:

1. projects the County desires to fund;
2. funding amounts for each project;
3. tasks and objectives to accomplish during the program year;
4. the public participation process accomplishments;
5. how other resources will be leveraged; and
6. how the County plans to address barriers to affordable housing, fair housing and homelessness.

The County's program year begins October 1 and ends September 30. At the end of each program year, the County will produce a Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER reviews the progress the County has made in carrying out the priorities in the Consolidated Plan and most recent AAP. The report includes a description of the resources made available, the investment of the resources, the distribution and location of investments, per 24 CFR § 91.520. This report must be submitted to HUD within 90 days of the end of the County's program year.

It is the policy of the County to ensure the meaningful participation of its citizens in the development of any Consolidated Plan, AAP, CAPER, and any Substantial Amendment to a plan, with particular emphasis on participation by low- and moderate-income residents and neighborhoods. The facilitation of a citizen participation process accessible to all residents regardless of minority status, disability, or English fluency is essential.

The Citizen Participation Plan (CPP) outlines the methods and procedures Collier County will use to solicit community feedback and engagement when developing plans and priorities for funds received by the U.S. Department of Housing and Urban Development (HUD). The CPP reflects the importance of community engagement while developing various neighborhood plans, programs and activities. The CPP also meets or exceeds the federal requirements found in 24 CFR 91.105.

Collier County is committed to ensuring opportunities are available for residents and stakeholders to provide meaningful, thorough and effective input in the development of community development plans and policies. The County will tailor its community engagement efforts to the unique landscape of Collier County from the agricultural areas of the eastern county to the urban enclaves along the Gulf of Mexico. Intentional efforts will be made to gain input from low- and moderate-income residents, disabled, elderly and other special populations that are likely to be impacted through the programs and activities developed during the planning process.

The CPP outlines the minimum participation requirements and processes. The Board of County Commissioners remains the sole approving authority for the various HUD plans and any amendments.

## CITIZEN PARTICIPATION PLAN REVIEW AND UPDATE

It is the policy of the County to encourage and facilitate the full and meaningful participation of residents, service providers, government agencies, and other stakeholders 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 Report (CAPER).

The primary purpose of the participation will be in needs identification, priority setting, program recommendations, and funding allocations related to the consolidated planning process. The County shall provide for and encourage citizen participation with particular emphasis on:

- Low and moderate-income persons, particularly those living in areas where CDBG/HOME and ESG funds are proposed to be used;
- Residents of predominantly low and moderate-income neighborhoods;
- Minorities;
- People with Limited English Proficiency;
- People with Disabilities;
- Residents of public and other assisted housing developments; and
- Local and regional institutions, the regional Continuum of Care and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, community and faith-based organizations).

Collier County is committed to keeping all interested groups and individuals informed of each phase of the Consolidated Plan and AAP processes, plus the activities undertaken with CDBG/HOME and ESG funds. Opportunities to comment on or participate in planning, community development, and affordable housing activities and projects will be publicized and disseminated throughout Collier County using a variety of media.

The CPP will be reviewed and updated at least once prior to the development of the five-year Consolidated Plan as required by HUD, or prior to the five-year interval if the Collier County Board of Commissioners deems necessary.

### Citizen Participation Plan Public Review and Comments

Collier County shall publish the draft CPP for public review and comment 30 days prior to submission of the draft CPP to the County Board of Commissioners for their review and approval. The County shall post the draft CPP on the County website and provide free printed copies upon request. The County shall notify past participating agencies, community groups, and civic associations when the draft is available for review and comment. The method of receiving public comments shall be included in the notice.

To provide Collier County residents with the maximum opportunity to comment on the CAPER, Citizen Participation Plan, Action Plan, Consolidated Plan, and any Substantial Amendment. The County will provide the following Public comments periods:

- Citizens may comment on the Consolidated Annual Performance and Evaluation Report at least fifteen (15) days from the date of the Public notice
- Citizens may comment on the Consolidated Plan and Action Plan for at least thirty (30) days after the publication date of the draft plan.
- Citizens may comment on the Citizen Participation Plan for at least thirty (30) days after the publication date for the draft document.
- Citizens may comment on any Substantial Amendments to the Consolidated Plan and Action Plan for at least thirty (30) days after the publication date for the draft document.

The following are appropriate ways to provide public comment on any public noticed document:

- Written comments may be submitted in person to the Community and Human Services Building H Suite 211
- Write to Community and Human Services Division
- Attend the Public Hearings and meetings described above. Each agenda provides time for public comment. The participation of all citizens, including minorities and persons with disabilities are particularly encouraged to provide public comments. Translation services, if required, must be requested in advance for scheduling purposes. Persons with limited English proficiency may also provide a translator of their choice. Translation or interpretation is subject to availability of web-based software or staff through Collier County Facilities Division and will request services upon five (5) business days advanced notice.

## CONSOLIDATED PLANNING AND ASSESSMENT OF FAIR HOUSING PROCESS

This section outlines how Collier County will ensure community engagement and participation in the development of the Consolidated Plan and Assessment of Fair Housing.

Community engagement and participation is the foundation of Collier County's community planning efforts. Collier County will undertake intentional steps and efforts to seek input and feedback in developing community plans, including the Consolidated Plan and Assessment of Fair Housing (AHF). There will be multiple points throughout the planning process that affords residents, public agencies and other stakeholders the opportunity to shape the consolidated planning process. Collier County will use engagement techniques such as facilitated public meetings and forums, focus group and individual interviews, as well as online and paper-based surveys. Collier County will also receive comments through informal discussions with stakeholders such as neighborhood associations through neighborhood meetings and phone or email communication.

### Public Planning Hearings, Meetings, Forums and Surveys

In order to engage residents and stakeholders during the development of the Consolidated Plan and AHF, Collier County shall facilitate a series of hearings, meetings, forums and surveys. The County will consider any comments or views of residents and stakeholders received in writing or orally, in preparing the Consolidated Plan, AHF, or Annual Action Plan.

#### Public Hearings

During the Consolidated Planning and AHF process, Collier County will hold at least one public hearing to gather input from residents, public agencies, and other key stakeholders. The public hearings will generally be held at the County Commission building but may be moved to a neighborhood-based location. Public hearing locations shall be accessible to persons with mobility impairments.

During the hearing, the County shall:

- Provide an overview of the CDBG, HOME, ESG and Fair Housing programs.
- Provide examples of past programs and eligible expenditures.
- Seek input on housing and community development needs and non-housing community development needs.

At a minimum, the public hearing shall be advertised at least 14 days prior to the hearing in the Naples Daily News or other newspaper of general circulation. The County will notify key constituents and public agencies of the hearing by letter, postcard or via email. The notice of

the public hearing will also be posted on the County's website and/or social media platforms. Translation services for non-English speaking residents will be made available during the public hearings.

#### Public Planning Meetings

A minimum of one public planning meeting will be held throughout the development of the Consolidated Plan and AFH to gather additional public input. Public planning meetings shall be advertised on the County's website and/or social media account, direct email to prior participants, and email notices to public agencies and stakeholders. Planning meetings will be located and facilitated in a manner to encourage participation among predominately minority and/or low-and moderate-income neighborhoods, and non-English speaking residents. Public meetings shall be held in locations that are accessible to persons with mobility impairments. Arrangements can be made through the Collier County Community and Human Services Division at least five (5) working days before any public meeting for those persons requesting assistance for special needs. Assistance can include, but is not limited to, assistance for non-English speaking persons and for those who require a sign language interpreter. The County must receive reasonable time to respond to any such requests.

#### Public Planning Forums or Focus Groups

The County shall consult with community agencies such as the Continuum of Care, housing authorities, social service agencies, former and current subrecipients, affordable housing developers and advocates, and neighborhood and civic leaders regarding needs within the community and needs of the clients served by the various agencies. This consultation may be done through focus groups or individual interviews.

#### Community Surveys

Collier County shall provide an alternative way for interested residents and community members, who cannot attend the public meetings, to comment on community needs and priorities such as through community needs and priorities surveys. Surveys shall be available in English and Spanish.

#### Public Review of the Draft Consolidated Plan and AHF

Collier County will make a draft of the Consolidated Plan and AHF available for public review and comment for a period of not less than 30 days. To ensure the community is aware of the funding available and proposed projects, Collier County shall publish the following information before adoption of the Consolidated Plan:

- The amount of assistance the County expects to receive (including grant funds and program income).
- The range of activities that may be undertaken.
- The estimated amount of funding that will benefit persons of low- and moderate-income.

- The County's plans to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance Collier County will make available (or require others to make available) to persons displaced, even if Collier County expects no displacement to occur.
- Locations where the draft plans will be available to review.

The County shall make the draft plans available free of charge online and in printed form. To inform residents and stakeholders the plan is available for review and comment, the County shall:

- Publish a summary of the proposed Consolidated Plan in the Naples Daily News describing the contents and purpose of the Consolidated Plan, and locations where the entire plan may be examined.
- Place an electronic copy of the plan on the County's website.
- Make printed copies available at: Collier County CHS Office Building and the main Collier County Library branch.
- Notify public agencies and stakeholders via email that the plan is available for review and comment.

## ANNUAL ACTION PLAN

The Annual Action Plan (APP) public participation process is similar to that of the Consolidated Planning process. At least one public hearing and one public meeting will be held during the planning process to identify needs and gather input regarding potential activities and available funds.

The County shall make the draft APP available free of charge online and in printed form. To inform residents and stakeholders the plan is available for review and comment, the County shall:

- Publish a summary of the proposed APP in the Naples Daily News describing the activities and proposed funding amounts, and locations where the entire plan may be examined.
- Place an electronic copy of the plan on the County's website.
- Make printed copies available at: Collier County Building and Collier County Library branches.
- Notify public agencies and stakeholders via email the plan is available for review and comment.

A draft Annual Action Plan will be published, and a 30-day public comment period will be observed. During this public comment period, one public hearing will be held to provide an opportunity for the public and stakeholders to comment on the draft AAP. These comments will be addressed and included in the plan documents. After the 30-day public comment period is



complete, the plan will be submitted to the Collier County Board of Commissioners for review and approval prior to plan submission to HUD. Collier County will submit the approved plan of to HUD for review no later than 45 days prior to the beginning of the program year, on or about August 15<sup>th</sup> of each year.

## AMENDMENTS TO THE CONSOLIDATED PLAN, ANNUAL ACTION PLAN OR ASSESSMENT OF FAIR HOUSING

Amendments to the Consolidated Plan, Annual Action Plan and Assessment of Fair Housing will be made public, and the County will notify HUD when the amendment has been made. The County will submit a copy of each amendment to HUD as it occurs.

### Criteria for Substantial Amendment to the Consolidated Plan or Annual Action Plan

The County may, from time to time, amend the Consolidated Plan or Annual Action Plan activities to further the housing and community development goals of the County. In accordance with 24 CFR 91.105(C), Collier County will use the following criteria for determining what changes in the planned or actual activities of the Consolidated Plan or Annual Action Plan constitute a Substantial Amendment subject to 24 CFR 91.105(b). 24 CFR 91.505 only applies to amendments of the Consolidated Plan and Action Plan, and not individual activities enumerated within HUD's Integrated Disbursement and Information System (IDIS)

Those changes in the planned or actual activities described in the Consolidated Plan or Annual Action Plan that do not meet the threshold of a Substantial Amendment will be processed administratively, in accordance with 24 CFR 91.505. Only Substantial Amendments are subject to the citizen participation process outlined within the Citizen Participation Plan. All other amendments are deemed administrative and shall be submitted to HUD as it occurs, or at the end of the program year in accordance with 24 CFR 91.505 (c).

The criterial for a Substantial Amendment to the Consolidated Plan and Action Plan shall include:

- The complete elimination of a project or activity from the CDBG, HOME or ESG entitlement program.
- A new CDBG, HOME, or ESG project or activity not described in the Consolidated Plan and/or Annual Action Plan.
- An increase or decrease in the CDBG, HOME, or ESG portion of the project or activity budget of more than \$50,000.00 or forty-five percent (45%), whichever is greater.
- Any major programmatic changes in the scope of the project or activity whereby the intended beneficiaries are reduced by more than 25% or the project location changes to the extent it no longer serves the original target population outlined in the Annual Action Plan.
- Budget Amendments as Part of the Annual Action Plan: budget balances de-obligated from cancelled activities or activities that have been successfully completed under-budget can be

rolled forward into the next Annual Action Plan and CDBG funding round. Because Citizen Participation for a Substantial Amendment follows the same requirement as the proposed Annual Action Plan, no additional public participation is needed for this type of amendment

### Revising an Accepted Assessment of Fair Housing

The accepted AFH may be revised in cases where:

- A material change has occurred that affects the fair housing priorities and the goals no longer reflect actual circumstances. This could include sudden natural disasters which preclude affirmatively furthering fair housing, significant demographic changes, or court orders.
- Upon written notice from HUD specifying a material change that requires a revision.

Any changes that constitute a substantial amendment to the Consolidated Plan, Annual Action Plan or AFH require Collier County follow the citizen notification of substantial amendments. All other non-substantial amendments will be completed administratively.

### Citizen Notification of Substantial Amendments

Collier County will notify residents and stakeholders if a substantial amendment to the Consolidated Plan, Action Plan or AFH is required. A summary of the proposed substantial amendment will be published in the Naples Daily News and posted on the County's website. From the date of publication of this summary, the County will provide for a 30-day comment period in which residents of Collier County will have the opportunity to provide their comments and views on the proposed substantial amendment.

During this public comment period, the County will hold one (1) public hearing for residents to provide comments and feedback. A copy of the substantial amendment will be available free of charge to any resident or interested party requesting it. Copies of the substantial amendment will be made available to the public on the County's website or from the Collier County Community and Human Services Division.

Collier County will consider any comments or views of citizens received in writing or orally at the public hearing in preparing substantial amendments to the Consolidated Plan, Annual Action Plan, or Assessment of Fair Housing.

### Disaster or Public Health Emergency Declaration and Funding

In situations where a natural disaster, public health crisis, or other emergency situation arises and HUD issues updated guidance, or special-use funding surrounding that particular emergency or event, Collier County will follow the revised HUD guidance when amending the Consolidated Plan or Annual Action Plan. In the event of a natural disaster or catastrophic occurrence, Collier County may determine the need to make a Substantial Amendment to the Consolidated Plan and Annual Action Plan to address the unforeseen needs of the community. The County may request and obtain from HUD a complete waiver or reduction in days of the required

thirty (30) days public notice period for Substantial Amendments. Emergency amendments do not require thirty (30) days public notice.

In such an event, the County will:

- Follow the revised HUD authorization related to the minimum required public comment period.
- Expedite, as prescribed by HUD, the public notification and public hearing process.
- Undertake additional measures, authorized by HUD, to expedite the use of HUD funds to mitigate the effects of the disaster or emergency within the community.

Collier County will consider any comments or views of citizens received in writing or orally at the public hearings in preparing substantial amendments to the Consolidated Plan, Annual Action Plan, or Assessment of Fair Housing.

## CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

Collier County will produce an annual performance report which will review and report on the progress it has made in carrying out its strategic plan and the action plan. This performance report will include a description of the resources made available, the investment of available resources, the geographic distribution and location of investments, the families and persons assisted (including racial and ethnic status of persons assisted), actions taken to affirmatively further fair housing, and other actions indicated in the strategic plan and the action plan. Collier County will provide residents and stakeholders reasonable time and opportunity to comment on this annual performance report before it is submitted to HUD.

The performance report will be submitted to HUD within 90 days after the close of the program year, which is September 30. To provide reasonable notice to residents and stakeholders, the County will publish a notice of the report in the Naples Daily News and on the County's website on or about sixty-five (65) days after the end of the program year. The County will provide a period of fifteen (15) days for the public to comment on the performance report during which the County will hold at least one public hearing to discuss the performance report. After the end of the public comment period, any comments will be addressed by staff and included as part of the CAPER before the report is submitted to HUD for review.

Copies of the draft and final documents will be available free of charge at the Collier County CHS building, County Website and Collier County Libraries.

Collier County will consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the Consolidated Annual Performance and Evaluation Report.

## PUBLIC HEARINGS AND MEETINGS

Collier County will hold at least two public hearings throughout each program year. At least one public hearing will be held before the publication of the Annual Action Plan and a second during the CAPER review period. The purpose of the public hearings will be to obtain citizens' views and to respond to proposals and questions. Each of the public hearings will address housing and community development needs, development of proposed activities, and review of program performance. As part of the Consolidated Plan process, the County will hold one public hearing during the 30-day public comment period before the Consolidated Plan is published and submitted to HUD.

Each of the public hearings will be advertised at least two weeks (14 days) before it is scheduled to be held with a notice in the Naples Daily News or other newspaper of general circulation. The County will also use the network of committees created to facilitate the development of the Consolidated Plan, to receive citizen input and inform the citizens of any proposed public hearing. Email or direct mailings will be used to provide information regarding public hearings to this existing network.

In general, public hearings and meetings will be held at the Collier County CHS Building, which is centrally located. However, public hearings and meetings may at times be held in different locations throughout the County, particularly in those areas with concentrations low- and moderate-income residents. The locations of all public hearings will be included in the notice, and all public hearings will be in locations that are convenient to actual and potential beneficiaries, and locations accessible to persons with disabilities. All meetings will be held in facilities which are accessible to persons with disabilities.

Arrangements can be made through the Collier County Community and Human Services Division at least five (5) working days before any public meeting for those persons requesting assistance for special needs. Assistance can include, but is not limited to, assistance for non-English speaking persons and for those who require a sign language interpreter. The County must receive reasonable time to respond to any such requests.

### **DISASTERS**

If a federal and/or state disaster declaration is made, the County will evaluate the available resources to address the disaster. If the County determines that resources are available, the County will follow the process for amendments as identified on page 5. To expedite actions to address the disaster, the County will request waivers from the HUD Miami Field Office for the following requirements within 24 CFR 91.115(c)(2) and (i):

1. *Citizen Participation Plan Comment Period for Substantial Amendments* – Reduce the public comment period from thirty days to no less than five days or as otherwise approved by HUD.

2. *Citizen Participation Reasonable Notice and Opportunity to Comment* – allows the County to determine and adjust what constitutes reasonable notice and opportunity to comment given the circumstances.

**Example:**

Per the CARES Act, ESG-CV funds shall not be subject to the consultation, citizen participation, or match requirements that otherwise apply to the Emergency Solutions Grants program, however the County must publish how it has and will utilize its allocation, at a minimum, on the Collier County website or through other electronic media.

## ACCESS TO RECORDS

The Consolidated Plan, Annual Action Plan, and Assessment of Fair Housing as adopted, any substantial amendments, and the performance report will be made available to the public. Upon request, these documents will also be provided in a form accessible to persons with disabilities. These documents will be available for public inspection in the Collier County Community and Human Services Division during regular business hours. Persons requesting special assistance in regard to access of these documents must provide the County reasonable time in which to aid in accessing these documents. The documents will also be available on the County's website.

The County will respond to any reasonable request for information and records relating to the Consolidated Plan and Action Plan for the preceding five (5) years. The County will provide this access to citizens, public agencies and other interested parties in a reasonable and timely manner. All requests for access to these records must be made in writing to:

Collier County Community and Human Services Division  
3339 East Tamiami Trail  
Suite 211  
Naples, Florida 34112-5361  
Phone:239-252-2273

## TECHNICAL ASSISTANCE

The County will hold mandatory technical assistance meetings to assist community groups and not-for-profit agencies who are interested in applying for CDBG, HOME and ESG funds. The County is committed to increasing the capacity of local agencies to become high-performing subrecipients, because the subrecipient agencies are a critical part of the successful implementation of affordable housing and community development programs.

In addition to the mandatory technical assistance meeting, the County will assist any groups with technical assistance related to the CDBG, HOME, or ESG program, or the Assessment of Fair Housing upon request.

## COMPLAINTS AND APPEALS

Collier County appreciates feedback from concerned residents and agencies on all aspects of the HUD programs and Assessment of Fair Housing. Such complaints should be filed within thirty (30) days of the alleged discriminatory act. All written complaints received by the Collier County Community and Human Services Division will be considered. Written complaints and feedback can be submitted to:

Collier County Community and Human Services Division  
Attn: Housing and Grant Development Manager  
3339 East Tamiami Trail  
Suite 211  
Naples, Florida 34112-5361

The County will provide a timely, substantive written response to every written citizen comment within fifteen (15) working days. Collier County will work with residents to address any reasonable concerns to the best of its ability.

The complaint must contain the following information:

- Name and address of the person(s) filing the complaint;
- A description of the act or acts considered to be in violation;
- Other available pertinent information that will assist in the review and resolution of the complaint.

If the complainant is dissatisfied with the response of the Community and Human Services Housing and Grant Development Manager, he/she may submit the complaint, in writing, to:

United States Department of Housing and Urban Development  
Regional Office of Community Planning and Development  
909 SE First Avenue  
Suite 500  
Miami, FL 33131  
(305) 520-5010

No person shall intimidate, threaten, coerce, or discriminate against any person because he/she has made a complaint, testified, assisted, or participated in any matter in an investigation, proceeding, or hearing related to a complaint.