



AMENDED
CITIZEN PARTICIPATION PLAN

-DRAFT-

CUMBERLAND COUNTY COMMUNITY DEVELOPMENT

Revised: June 2020

Due to COVID-19, program flexibilities and amendments to plans are requested. These flexibilities and amendments establish expedited procedures to draft, propose, or amend consolidated plans (including annual action plans) and citizen participation plans. The public comment period cited for substantial amendments during the emergency period, may run concurrently with a minimum 5-day public comment period on amendments to the Citizen Participation Plan as outlined in “CARES Act Flexibilities for CDBG Funds Used to Support Coronavirus Response” dated April 9, 2020.

Given the need to expedite actions to respond to COVID-19, HUD waives 24 CFR 91.105(c)(2) and (k), as specified below, in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG and HOME funds.

SUMMARY OF PROPOSED REVISIONS TO THE CITIZEN PARTICIPATION PLAN

- Updates the types of declared disasters or emergency events to include terrorism and infectious diseases, such as the recent coronavirus 19 (COVID-19) pandemic, that may necessitate expedited substantial amendments;
- Remove the requirement to hold in-person public hearings in order to comply with national and local social gathering requirements;
- Allow the County to provide no less than five (5) days for public comments on substantial amendment(s);
- Includes virtual hearings as an allowed method for citizen participation;
- Outline possible actions, including reprogramming of funding and types of possible activities that may be undertaken in response to declared disasters and emergency events;
- Include provisions relative to Consolidated Plan citizen participation and waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act and future declared disasters or emergency events; and
- Minor edits and formatting that do not change current citizen participation policies.

The waiver described on this page supersedes any conflicting information contained in the remainder of this Citizen Participation Plan throughout the COVID-19 emergency period.

Changes to the Citizen Participation Plan are highlighted in yellow.

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CITIZEN PARTICIPATION PLAN

GENERAL

Pursuant to the requirements of 24 CFR 91.105 and the North Carolina General Statutes, Cumberland County Community Development (CCCD) Department hereby issues the following Citizen Participation Plan to provide meaningful and inclusive opportunities for citizen involvement in the planning, development and assessment of all programs funded by the U.S. Department of Housing and Urban Development (HUD) and administered through the County's Community Development Department.

The Citizen Participation Plan is to provide guidelines that Cumberland County, through its Community Development Department (CCCD), will follow to ensure that the citizens of Cumberland County are adequately made aware of: 1) the amount of funding Cumberland County expects to receive, including grants and program income; 2) the range of activities to be undertaken with the funding, and how much is to benefit low-and moderate-income citizens; and 3) the plan to minimize displacement of persons due to CCCD activities and/or the assistance available to persons who are displaced. The Citizen Participation Plan specifically addresses the time frame and manner in which citizens will be informed and encouraged to participate in the planning process for the expenditure of community development funding. The Citizen Participation Plan will also address how citizens will participate in the development stages of the Consolidated Plan, Assessment of Fair Housing, Annual Action Plan, Consolidated Annual Performance and Evaluation Report, and any substantial amendments to each.

Review of the Citizen Participation Plan - All citizens of Cumberland County will be afforded an opportunity to comment on Cumberland County's Citizen Participation Plan. Upon the completion of any substantial amendment to the Citizen Participation Plan, the plan will be placed in several locations throughout the County for a period of public review. During the public review period, citizens will be given the opportunity to review and make comments on the plan for a period of 30 days unless exceptions are granted by HUD or the State in response to a declared disaster or emergency. Upon request, special accommodations will be made for persons with disabilities or non-English speaking individuals to ensure their participation in the public review process. Such accommodations will follow those outlined in the body of this Citizen Participation Plan. Any comments relative to the Citizen Participation Plan should be forwarded to the CCCD office for response. CCCD will respond to each comment in writing within 30 days after receipt. CCCD will endeavor to include citizen comments generated during the public review process into the Citizen Participation Plan, wherever possible. All comments received as part of the public review process will be attached to the finalized Citizen Participation Plan.

EXPLANATION OF THE PROCESS

Based upon census population and income data, Cumberland County was designated as an entitlement community to receive funding from the U.S. Department of Housing and Urban Development (HUD). As an entitlement community, the County receives an annual allocation or entitlement funding for the development of housing and implementation of other programs to improve the quality of life of the residents of Cumberland County. The areas included within the participating jurisdiction include the unincorporated areas of the County (outside the city limits of Fayetteville), Town of Eastover, Town of Falcon, Town of Godwin, Town of Hope Mills, Town of Linden, Town of Spring Lake, Town of Stedman, and the Town of Wade. HUD requires several reports detailing when and how the entitlement funds will be expended for the benefit of the citizens of Cumberland County. Those reports are:

- **The Consolidated Plan (Con Plan)** - The Consolidated Plan is a strategy that identifies the priority needs of the community as well as a plan of action for meeting those needs with specific programs. This plan must be updated every five years;
- **The Annual Action Plan (AAP)** - The Annual Action Plan is a yearly update of the Consolidated Plan in which CCCD identifies specific projects that will be funded from each of the entitlement programs for a particular fiscal year;
- **The Consolidated Annual Performance and Evaluation Report (CAPER)** - The Consolidated Annual Performance and Evaluation Report is a yearly summary that identifies the specific projects that were funded the previous program year. The CAPER also identifies the amount of funds that were budgeted for each project, the amount of funds that have been expended to date for the particular project, as well as the demographic information relative to the number of individuals actually served from the project; and
- **Substantial Amendments** – A substantial amendment is required if it is necessary to change the use of funds budgeted in an Annual Action Plan or a change in the priorities established in the Consolidated Plan. See Plan Amendments, of this document for the complete criteria established by CCCD which constitutes a substantial amendment.

THE PLANNING PROCESS - CONSOLIDATED PLAN/ANNUAL ACTION PLAN

The geographic area included in the participating jurisdiction totals approximately 600 square miles. In order to ensure that all residents of Cumberland County (particularly minority and non-English speaking residents, disabled residents and low and moderate income persons) are afforded the opportunity to participate in the planning and development process of the Con Plan and AAP, public meetings will be held at the most appropriate locations which provide coverage across the County. CCCD will make special efforts to consult with the Fayetteville Metropolitan Housing Authority, as well as other organizations and agencies representing and serving low to moderate income citizens, or those with special needs, during the consolidated planning process. These consultations will be used to gain information on the needs and priorities of their client groups and for suggestions of projects to be funded under the Community Development Program.

CITIZEN PARTICIPATION

Public Meetings – CCCD will hold a series of public meetings each year in order to solicit citizen input into the planning and development process of the Con Plan and AAP. The purpose of these meetings will be to inform the public of proposed activities for the Con Plan or the AAP, allow citizens an opportunity to comment on the proposed activities prior to adoption of the Plan, and review the performance of the program.

All public meetings will generally be held between 6:00 p.m. and 8:00 p.m., or at a time which will accommodate the specific needs of the community. The first series of meetings will usually be held during the fourth quarter of each calendar year (October - December). The subject matter at these meetings will include a discussion of the amount of entitlement funding that Cumberland County expects to receive, the range of activities that may be undertaken with the entitlement funds, and an estimate of the number of low and moderate income persons that will be assisted with the funds. Additionally, CCCD staff will be present to explain the current programs underway, as well as solicit comments and ideas relative to the development of new programs/projects to address housing and non-housing needs for the community.

The second series of meetings will typically be held during the first and/or second quarters of each calendar year (February - April). At least one of these meetings will be held in conjunction with a regular meeting of the governing body prior to its adoption of the Con Plan or AAP.

Public Meeting Locations – Public meetings will be held at several locations throughout the County to ensure that each of that all geographic regions of the County are covered. Primary locations, which may be used on a regular basis, include town halls and recreation centers. Additional locations may also be used at CCCD's discretion. Adequate notice of such meeting locations, dates, and times will be given prior to the meeting pursuant to the Public Notice provision of this Citizen Participation Plan.

Public Hearings – Whenever the public meeting dates coincide with one of the governing body's meeting dates, the governing body will be asked to participate. A minimum of two (2) public hearings will be held each year before the governing body. The subject matter of these hearings will be to inform the public of proposed activities for the Con Plan or the AAP, allow citizens an opportunity to comment on the proposed activities prior to adoption of the Plan, and review the performance of the program.

During a Presidentially declared disaster or emergency period, the County or CCCD may hold virtual public meetings / hearings in order to comply with federal or state requirements such as social distancing. Processes for holding public meetings / hearings and handling notices and comments will be in accordance with policies and/or waivers issued by HUD or the State during the disaster or emergency period.

Public Notice – Prior to the adoption of the Con Plan, AAP, CAPER, or any amendments, CCCD will ensure that adequate notice is given to all citizens, public agencies, and interested parties of all public meetings to give citizens an opportunity to examine the documents and submit comments on the content of each. Notice of all public meetings or hearings shall be given at least 10 days prior to the meeting date or review period unless an exception is allowed by HUD in response to a Presidentially declared disaster or emergency. Such notice will be accomplished using any of following methods:

Newspaper: CCCD will publish notice of the availability for review of the proposed Con Plan, AAP, or CAPER, to include the location of any public meetings and / or sites and where the document may be reviewed, in one or more newspapers of general circulation. CCCD will publish the notice in the Public Notice Section of *The Fayetteville Observer*. Such notice shall include a summary of the Con Plan, AAP, or CAPER, the contents and purpose of the document, and a list of locations where entire copies of the

document may be examined. Copies of the Con Plan, AAP, or CAPER will be provided to interested citizens or groups, at their request.

Public Service Announcements: CCCD may utilize public service announcements to advise citizens, agencies, and interested parties of public meetings and public review/comment periods concerning any of the above mentioned documents. Said public service announcements will be sent to media sources whose distribution or service area encompasses Cumberland County.

Other Sources: Notice of public meetings and public review sites may also be:

- placed in public buildings and commercial establishments near the meeting sites when allowed;
- placed at locations that are frequented by the prospective beneficiaries of the program;
- distributed to area community groups and places of worship, when practical;
- posted on the County website and / or social media sites in accordance with County policy;
- posted on websites and / or social media sites of other community groups;
- emailed to individuals and community groups; and
- specifically marketed to community groups that serve minorities, non-English speaking citizens, and persons with disabilities.

Public Review and Comment Period - Before the adoption of the Con Plan, AAP, CAPER, Citizen Participation Plan, or any substantial amendment thereof, citizens will be afforded the opportunity to review the document during a public review and comment period. The public review period for each aforementioned document is as follows:

Citizen Participation Plan	No less than 30 days
Consolidated Plan / Assessment to Fair Housing	No less than 30 days
Annual Action Plan	No less than 30 days
Consolidated Annual Performance and Evaluation Report	No less than 15 days
Plan Amendments	No less than 30 days

When the County is receiving a special supplemental funding or in the case of a Presidentially declared disaster or emergency, the comment period can be held for a minimum of 5 days or in accordance with the policies or waivers issued by HUD. The comment period can run concurrently for comments on a plan amendment and amended citizen participation plans.

Public Review Sites - The following public review sites may be utilized for placement of documents during a public review/comment period. CCCD may add or delete certain review sites at its discretion.

Eastover Town Hall
4008 School Street, Eastover, NC

Wade Town Hall
7128 Main Street (Hwy 301 North), Wade, NC

Falcon Town Hall
7156 West Street, Falcon, NC

Godwin Town Hall
4924 Markham Street, Godwin, NC

Hope Mills Town Hall
3411 Golfview Road, Hope Mills, NC

Linden Town Hall
9456 Academy Street, Linden, NC

Stedman Town Hall
5110 Front Street, Stedman, NC

Spring Lake Town Hall
300 Ruth Street, Spring Lake, NC

Cumberland County website and social media sites

Websites and social media sites of other community groups

Cumberland County Community Development
707 Executive Place, Fayetteville, NC

Comments/Complaints - CCCD shall consider all comments received, either orally or in writing, at the public meetings relative to the development of the Con Plan, AAP, and CAPER. A summary of all citizen comments or views received (including those comments not accepted and reasons therefore) shall be attached to the final adopted version of the Con Plan, AAP, and CAPER.

Procedures for Handling Comments/Complaints: CCCD staff will prepare a written response to any person's comment or complaint stating what action will be taken. If the complaint cannot be addressed, the reason why will be stated. The response will be reviewed by the Community Development Director and, when necessary, forwarded to County Management for review and any recommended course of action. The response will be made within fifteen (15) days. All comments and responses of significant measure will be included in the Con Plan, AAP, and the CAPER. Comments or complaints received outside of the planning process for any of the aforementioned documents will be handled in the same manner described in this section.

Plan Amendments - As the County's needs change, the County may elect to update its needs assessment, modify, or create new activities, or reprogram funds especially during Presidentially declared disasters or emergencies. CCCD shall provide notice to all citizens of any substantial amendments to the Con Plan or the AAP. A substantial amendment is constituted as:

- A change in allocation priorities or a transfer of funds between programs, the amount of which is greater than 25% of the total funds in the dispersing program;
- When a previously proposed program will be deleted or if a new program is added to the Con Plan or the AAP; and
- To change the purpose, scope, location, or beneficiaries of an activity.

Such notice will be provided in accordance with the Public Notice section of this Citizen Participation Plan. Sites in the area affected will receive notices whenever possible. Any comments received regarding a substantial plan amendment shall be pursuant to the Comment/Complaints section of this Citizen Participation Plan.

LIMITED ENGLISH PROFICIENCY

LEP is defined as persons and populations 18 years or older who have a limited ability to read, write, speak, or understand English, and may require language assistance with respect to a particular type of services, benefit, or encounter. Based on the data available used from the 2010 American Community Survey and collection at the Census Tract level for eligible population for the Consolidated Plan, Cumberland County do not have significant LEP populations according to Census data for the towns within Cumberland County's urban county jurisdiction.

Assisting Minorities and Non-English Speaking Persons, Persons with Disabilities, and Low- and Moderate-income Persons

Outreach and marketing efforts are to ensure that all citizens are made aware of public meetings and public review periods. Therefore, specific outreach efforts will be made for the following groups:

Minorities

Specific outreach and marketing efforts will be made to minority groups by distributing notices through minority community groups (i.e. NAACP, The Hispanic/Latino Center, Cumberland County Association for Indian People, etc.), churches and other places of worship, and targeted civic organizations. In addition, outreach efforts will be made specifically in neighborhoods where census data indicates a concentration of minorities.

Non-English Speaking Persons – Language Access

To the maximum extent feasible, CCCD will accommodate the needs of non-English speaking residents. In all newspaper advertisements and mailings for public meetings/hearings, contact information to request services, such as an interpreter, will be provided. All accommodation requests should be made five (5) business days prior to the advertised public meeting/hearing. However, if a request is made within the five (5) business days, every reasonable effort will be made to provide the needed service.

Persons with Disabilities

CCCD is committed to providing equal access to its facilities, programs and services for persons with disabilities by holding all meetings in locations that are handicapped accessible. Individuals requesting reasonable accommodations for public meetings/hearings should do so five (5) business days prior to the advertised meeting. However, if a request is made within the five (5) business days, every reasonable effort will be made to accommodate the request.

Low- and Moderate-income Persons

Specific outreach and marketing efforts will be made by distributing notices in neighborhoods where census data indicates a concentration of low- and moderate-income persons. Outreach efforts will also be made through agencies and organizations that serve low- and moderate-income persons such as the Department of Social Services, the Public Health Department, etc.

TECHNICAL ASSISTANCE

Upon request, CCCD staff will meet with neighborhood groups or advocacy interest groups to obtain their views on housing and non-housing needs. CCCD staff shall provide technical assistance to these groups in the form of either group or one-on-one meetings, as appropriate. The subject matter of these meetings may consist of training on non-profit development, capacity building activities, or any other area that is needed. The staff will assist low/moderate income individuals and/or groups that serve low/moderate individuals

with the development of proposals and/or completion of applications for any program CCCD may offer that is funded through the entitlement programs.

ACCESS TO RECORDS

Upon request, CCCD will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to Cumberland County's Con Plan, AAP, or CAPER. Such records shall include information regarding Cumberland County's use of entitlement funding in the five-year period preceding any request.

ADDITIONAL CITIZEN PARTICIPATION REQUIREMENTS: LOAN GUARANTEES

In addition to complying with the requirements of the Citizen Participation Plan, the County will comply with the regulations contained in 24 CFR Part 570.700 Subpart M - Loan Guarantees. In order to afford all citizens the opportunity to review the contents of any loan guarantee application, the County will observe the following process:

Publish community-wide a public notice informing affected citizens of the County's intent to submit a loan guarantee application.

Citizens will be allowed to review and make comments on the proposed application for a 15-day period.

During the 15-day comment period, a Public Hearing will be held before the Board of County Commissioners affording any citizens who wish to comment the opportunity to do so.

All comments received will be considered and responded to, in accordance with the appropriate section in the Citizen Participation Plan. In the event any such comments are deemed critical to protecting the interest of the citizens in the affected area, the applications will be modified to reflect the proposed changes prior to the release of the final application.

EXPEDITED CITIZEN PARTICIPATION PROCESS

In the event the County of Cumberland receives any special supplemental funding or allocation in in which there is a Federally Declared Disaster / Emergency, CCCD will provide for the following process:

- Will furnish to the public any proposed program amendments related to disaster / emergency relief or recovery activities which will include the location of proposed activities and related funding sources and uses; and
- Will provide the public with at least a 5-day review and comment period prior to the approval of any program amendments by the Board of County Commissioners. The review and comment period can run concurrently for comments on plan amendments and amended citizen participation plans.

AVAILABILITY TO PUBLIC

CCCD shall ensure that copies of the Con Plan, AAP, and CAPER, and any substantial amendments thereof, are available to the public at all times. In addition, citizens may obtain copies of said documents upon request. In the event that such a request is made by a person with a disability or who is non-English speaking, CCCD shall ensure that the copies of the requested document are provided in a form accessible to said person. Persons seeking copies of any of the above documents or who desire additional information may contact CCCD by email at cccdinfo@co.cumberland.nc.us or:

In person:
707 Executive Place
Fayetteville, NC 28305

By Mail:
Post Office Box 1829
Fayetteville, NC 28302-1829

Cumberland County Community Development

Hours of operation: Monday – Friday, 8:00 a.m. to 5:00 p.m.

Phone: (910) 323-6112 Fax: (910) 323-6114 TTY: 910-223-9386

Website: www.co.cumberland.nc.us/community_dev.aspx

The hours of operation is subject to change during an emergency / disaster situation.

This procedure explains the actions Cumberland County Community Development will take to ensure compliance with Title VI of the Civil Rights Act of 1964, Executive Order 13166 and HUD's 72 FR 2732 require that recipients of federal financial assistance must take reasonable actions to ensure meaningful access to their activities, programs and services for individuals with Limited English Proficiency (LEP).

Cumberland County Community Development is responsible for administering Community Development Program funds (CDBG, HOME, ESG, COC, etc.) throughout the Cumberland County area. CCCD will ensure that LEP persons have meaningful access to its programs and services. It is CCCD's commitment to provide language access services to LEP individuals needing access to federally funded programs; to inform LEP individuals that language access services are available. Persons with Limited English Proficiency will be asked to contact CCCD if an interpreter is needed.

LEP is defined as persons and populations 18 years or older who have a limited ability to read, write, speak, or understand English, and may require language assistance with respect to a American Community Survey and collected at the Census Tract level for eligible population, Cumberland County do not have a significant non-English speaking populations according to Census data for the towns within Cumberland County's urban county jurisdiction.

The County's population is more heavily weighted to younger people that that of the State overall with 8.2% of the population under the age of 5 versus 6.2 in North Carolina and 26% versus 23.2% in North Carolina. Cumberland County urban county jurisdiction includes towns of Eastover, Hope Mills, Stedman, Falcon, Godwin, Spring Lake, Wade and Linden and incorporated areas.

PROVIDING NOTICE TO LEP INDIVIDUALS

CCCD will follow the Language Access Plan for Limited English Proficiency persons. CCCD will provide notice to LEP individuals of their eligibility for benefits, programs, and services in a language they understand, to the maximum extent practical. All correspondence from CCCD related to its programs which impact individuals and small businesses that are sent to prospective or existing applicants includes a

provision indicating that free language interpretation services are available by contacting CCCD within five business days.

CCCD has developed an LEP and LMI Outreach and Marketing Plan that will ensure that all the LEP communities in most impacted areas in the county receive, via a variety of mediums, notification about all of the open federally funded programs where funds and/or units may be available to them.

All outreach efforts will be culturally appropriate and utilize demographic data to ensure campaigns are reflective of and targeted towards the specific needs of the LEP communities throughout the region. CCCD aims to ensure that all outreach efforts are timely, relevant, and offered via multiple mediums. The specific outreach efforts CC will conduct are outlined in detail in CCCD's LEP and LMI Outreach and Marketing Plan.

CCCD is also providing translations of outreach materials in Spanish, as appropriate, when outreach efforts are targeted towards LEP communities and applicants of federally funded programs.

CCCD and its contracted communications experts will provide outreach services to LEP populations. All teams working on outreach will report directly to the Fair Housing Specialist on a regular basis regarding specific LEP outreach activities and numbers of LEP individuals contacted (as available). CCCD will regularly assess and maintain an accurate record of language assistance services, in order to improve LEP outreach programs and activities in accordance with customer need and program resources and capacity.

MONITORING/COMPLAINT/RESOLUTION

CCCD on an ongoing basis will assess changes in demographics, types of services or other needs that may require re-evaluation of policies and procedures. CCCD will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, feedback from residents and community organizations, etc.

CCCD will provide assistance to LEP individuals who do not speak or write in English if they indicate that they would like to file a complaint. A complaint will be filed in writing, contain the name and address of the person filing it or his/her designee and briefly describe the alleged violation of this policy. CCCD will maintain records of any complaints filed, the date of filing, actions taken and resolution. CCCD will notify the appropriate staff (Fair Housing Specialist) and Department of complaints filed, the date of filing, actions taken and resolution. This information will be provided within 30 days of resolution.

CITIZEN PARTICIPATION PLAN - COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RECOVERY PROGRAM

Cumberland County has developed a Citizen Participation Plan specifically to comply with the public participation requirements of 24 CFR Part 91 for the Community Development Block Grant Disaster Recovery grant program. This Plan was also developed to incorporate the City of Fayetteville as a part of the CDBG-DR program area. The goal of the Citizen Participation Plan is to provide meaningful and inclusive opportunities for citizen involvement in the planning, development, and assessment of all CDBG-Disaster Recovery programs developed in response to the consequences of the 2016 Hurricane Matthew for the entire Cumberland County area cities, towns and unincorporated areas.

A collaborative approach is used to engage interested municipalities during the planning development period. Outreach events are held to inform residents of the activities, funding process and solicit input

regarding the community's recovery priorities. These types of outreach will continue as recovery needs evolve and program activities are modified. Attempts will be made to reach all citizens, with particular emphasis on participation by persons of low and moderate income and residents of areas where use of where funds has been proposed.

The State's Disaster Recovery Action Plan and subsequent amendments are posted in accessible formats to the State's NC Rebuild website. Public notices regarding Disaster Recovery programs will be in the Fayetteville newspaper and placed in a prominent location on the County's Community Development webpage, along with a hyperlink to the NC Rebuild Disaster Recovery webpage.

Cumberland County is committed to comply with the Americans with Disabilities Act. Persons with mobility, visual or hearing impairment requiring special accommodations.

SUBSTANTIAL AMENDMENTS TO THE DISASTER RECOVERY ACTION PLAN

As Cumberland County's recovery needs change, the County may elect to update its needs assessment, modify, or create new activities, or reprogram CDBG-Disaster Recovery funds. The County defines substantial amendments to the Action Plan as those that propose one or more of the following changes:

- A change in the purpose, scope, location, or beneficiaries of an activity approved in the Action Plan or subsequent amendment;
- The allocation or re-allocation of more than 25% of the grant total grant award; or
- The addition or deletion of any allowable activity described in the approved plan.

Only substantial amendments are subject to the citizen participation process. Citizens will be provided at least 30 days to review and comment on all substantial Action Plan Amendments, unless granted by HUD a waiver for a shorter comment/review period. A summary of all comments received and a response to those comments will be attached to the final Substantial Amendment.