

AMENDMENT

CITIZEN PARTICIPATION PLAN

Summary of Amendment

In 2013, the Metropolitan Development and Housing Agency (MDHA) developed a Citizen Participation Plan in conjunction with the development of the 2013-2018 Consolidated Plan for Housing and Community Development. In July 2015, the U.S. Department of Housing and Urban Development (HUD) adopted a new rule on affirmatively furthering fair housing (AFFH) that provides HUD grantees with clear guidelines and data to analyze fair housing issues and set locally-determined fair housing priorities and goals through an Assessment of Fair Housing (AFH). HUD grantees must submit an AFH to HUD 270 days prior to the beginning of the next Five Year Plan. Metropolitan Nashville-Davidson County's (Metro) next Five Year Consolidated Plan for Housing and Community Development will begin on June 1, 2018; therefore, Metro's AFH is due to HUD on September 1, 2017. Although MDHA's next Five Year Public Housing Authority (PHA) Plan is on a later cycle, Metro and MDHA will undertake a joint local government/PHA AFH.

HUD regulations (24 CFR 5.158) require that consolidated plan participants, such as Metro, follow its citizen participation plan in providing the public with reasonable opportunities for involvement in developing the AFH. Similarly, public housing authorities, such as MDHA, must follow HUD requirements for obtaining resident and community feedback. MDHA is amending the Citizen Participation Plan for its Consolidated Plan programs to incorporate the HUD requirements regarding community participation, consultation, and coordination in the development of a joint AFH.

Specifically, this Amendment

- Adds language in the **Introduction** section pertaining to the AFH requirements. Amended language is shown in red so that the public can see the changes made to the existing Citizen Participation Plan.
- Adds a new section on the **Assessment of Fair Housing**.

All other sections of the Citizen Participation Plan remain unchanged.

Introduction *(Amended language in red.)*

The Citizen Participation Plan is designed to provide for and encourage citizen involvement in the development, implementation and evaluation of housing and community development programs in Metropolitan Nashville-Davidson County, Tennessee (Metro). While the processes contained in this Citizen Participation Plan may be used to address a broad range of public and private resources, this Plan is specifically designed to meet the citizen participation requirements for the Consolidated Plan ~~for housing and community development needs of Metropolitan Nashville-Davidson County~~ and the joint Assessment of Fair Housing (AFH) for Metro and the Metropolitan Development and Housing Agency (MDHA). Completion of the Consolidated Plan and AFH is required by the U.S. Department of Housing and Urban Development (HUD) in order for ~~Metropolitan Nashville-Davidson County~~ to receive federal funds allocated through the Community Development Block Grant (CDBG), the HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG), and the Housing Opportunities for Persons with AIDS (HOPWA) Program. An AFH is also required for public housing authorities (PHAs).

As the lead agency responsible for the preparation and administration of the Consolidated Plan and the AFH, the ~~Metropolitan Development and Housing Agency (MDHA)~~ has the primary responsibility for developing and implementing the Citizen Participation Plan. Per the federal regulations found at 24 CFR 91, the citizen participation plan must provide for and encourage citizens to participate in the development of the AFH and any amendments/revisions, the Consolidated Plan, the annual action plan, and any substantial amendments to the Consolidated Plan, and the consolidated annual performance report (CAPER). The citizen participation plan is designed especially to encourage participation by low- and moderate-income persons, particularly:

- those living in slum and blighted areas,
- in areas where CDBG funds are proposed to be used,
- residents of predominantly low- and moderate-income neighborhoods,
- residents of public and assisted housing developments, and
- residents of targeted revitalization areas in which the developments are located.

In addition, 24 CFR 903 describes the policies and procedures that public housing authorities [MDHA] must follow in developing the AFH. These requirements are designed to obtain feedback from the Resident Advisory Board and the public.

MDHA will follow its citizen participation plan to the greatest extent possible. The requirements for citizen participation do not restrict the responsibility or authority of MDHA for the development and execution of its AFH or Consolidated Plan. MDHA will provide citizens with a reasonable opportunity to comment on amendments to the citizen participation plan and will make the citizen participation plan public. The citizen participation plan must be in a format accessible to persons with disabilities, upon request.

The Community Development Department of MDHA is the point of contact for all questions, comments, complaints, and requests for technical assistance related to the Citizen Participation Plan, the AFH, and the Consolidated Plan. The Community Development Department can be contacted by telephone at 615-252-8505 or by e-mail at comments@nashville-mdha.org. Please address all correspondence to:

MDHA Development Department
Attn: Consolidated Plan
P.O. Box 846
Nashville, TN 37202

MDHA will maintain a mailing list to keep interested parties informed with updates regarding the AFH and the Consolidated Plan. To be added to the mailing list, please call 615-252-8505.

Assessment of Fair Housing (New section)

HUD requires cities and public housing authorities that receive federal funds for housing and community development to Affirmatively Further Fair Housing (AFFH). To fulfill this requirement as recipients of these funds, MDHA and Metro Nashville must conduct an Assessment of Fair Housing (AFH), which includes an analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals. The purposes of the AFH is to assess whether individuals and families have the information, opportunity, and options to live where they choose without unlawful discrimination related to **race, color, religion, sex, familial status, national origin, or disability** and assess whether housing options are realistically available in integrated areas and areas with access to opportunity.

AFH Planning/Preparation Phase

The requirements for developing the AFH are specified in 24 CFR 5.154, 5.156, 5.158, and 5.160. The AFH will be developed using the HUD-provided local government assessment tool. In addition, HUD has provided data and maps to be used in the analysis. Local data and local knowledge will be used to supplement the HUD-provided data. Early in the planning process, MDHA will hold a public hearing to discuss the AFH planning process and timeline, review the AFH planning tools, and explain the citizen participation process.

1. **HUD-provided data and resources.** HUD-provided data and tools are available for the public to view by clicking on the links below.
 - **Local Government Assessment Tool:**
<https://www.hudexchange.info/resource/5216/assessment-of-fair-housing-tool-for-local-governments/>. Please note that Sections F and G and Appendix D **do not apply** to the Metro/MDHA AFH.
 - **AFFH Data and Mapping:**
<https://www.hudexchange.info/programs/affh/resources/#affh-data-and-mapping>.
 - **Additional AFFH Resources:**
<https://www.hudexchange.info/programs/affh/resources/#tools-for-fair-housing-planning-under-the-affh-rule>.
2. **Local Data:** HUD defines local data as metrics, statistics, and other quantified information, subject to a determination of statistical validity by HUD, that are relevant to Metro's/MDHA's geographic area of analysis, can be found through a reasonable amount of searching, are readily available at little or no cost, and are necessary for the completion of the AFH using the local government assessment tool. For the purpose of completing the AFH, MDHA will utilize local and state data that meet HUD's criteria, which may have been prepared by public agencies, universities, etc. When such data is used, it will be properly cited.
3. **Local Knowledge:** HUD defines local knowledge as information that relates to the Metro's/MDHA's geographic area of analysis and that is relevant to the AFH, is known or becomes known to MDHA, and is necessary for the completion of the AFH using the local government assessment tool. Essentially, local knowledge is public input, and MDHA plans to obtain community input during the development of the AFH through stakeholder consultations and community/resident engagement. In addition to the meetings outlines below,

MDHA will accept input throughout the preparation of the AFH through meetings by appointment, written comments, etc.

- **Stakeholder consultations:** In preparing the AFH, MDHA staff will consult with public and private agencies that provide assisted housing, health services, and social services (including those focused on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons), community-based and regionally based organizations that represent protected class members, and organizations that enforce fair housing laws. MDHA will accomplish this through a series of stakeholder meetings.
- **Community meetings:** In preparing the AFH, MDHA staff will hold a minimum of 5 community input sessions at different locations throughout the county and at times that are convenient for most citizens (such as Saturdays or evenings). Community meetings will be publicized in accordance with the Public Notice procedure described below.
- **Public housing resident consultations:** In preparing the AFH, MDHA staff will consult with the MDHA Resident Advisory Board/Council of Presidents and attempt to hold consultations at every MDHA public housing property.

Local knowledge/community input is critical to developing an AFH that reflects the needs and experiences of the citizens of Nashville. Everyone is encouraged to participate.

AFH Draft Review and Comment Period

MDHA will publish the draft AFH for review and comment for 45 days. During the public comment period, MDHA will hold at least 5 public hearings. One of the public hearings will be held before the MDHA Board of Commissioners, while at least 4 public hearings will be held at different locations throughout the county and at times that are convenient for most citizens (such as Saturdays or evenings). A summary of the comments received during this period, including an explanation of why some comments/views were not accepted, will be included in the final AFH.

At the conclusion of the public comment period, the final AFH will be submitted to the MDHA Board of Commissioners then to the Metropolitan Council for approval. Upon receiving all local approvals, the final AFH will be submitted to HUD.

Public Notice

At a minimum, MDHA will utilize the following methods to notify the public of community meetings and public hearings.

- **Publication:** MDHA will publish notices of meetings in The Tennessean, the Tribune, and El Crucero.
- **Social Media:** MDHA will post notices via its social media outlets (Facebook, Twitter, etc.) and ask partners and the public to share these posts.
- **Email Outreach:** MDHA will send an email through its vast distribution lists as well as utilize Metro's email network. MDHA will request that persons receiving an email to forward to others.
- **Website:** MDHA will also post notices on its website and attempt to coordinate with Metro to post on its website.
- **Posting at Locations:** MDHA will post copies of the notices at its administrative offices and public housing properties and request that Metro and partner agencies post notices at their offices.

Public notice regarding the availability of the draft AFH for review and comment will be accomplished through the means listed above and the public notice will include:

- A summary of the contents of the draft AFH;
- Announce the dates, times, and locations of the public hearings on the draft AFH;
- Information on how the public can obtain copies of the AFH.

AFH Amendments/Revisions

During the course of administering the AFH, it may be necessary to amend or revise the plan due to new information becoming available. MDHA will consider an amendment to be substantial if (1) goals and/or priorities change or (2) HUD requires a substantial amendment in order to be in compliance with regulations. Substantial amendments are subject to this Citizen Participation Plan.

Revisions to the plan that do not meet the criteria stated above are not considered substantial and are not subject to this Citizen Participation Plan. However, MDHA will post revisions to the MDHA website and notify the public of the availability of the revised AFH.

Reasonable Accommodation

MDHA makes every effort to provide reasonable accommodations and services to assist persons with disabilities or sensory impairments. Additionally, to ensure meaningful access to non-English speaking and limited English proficient residents, MDHA will take reasonable steps to make language assistance/translation services available upon request. Any person needing such assistance/services will be asked to contact the agency at 615-252-8555 or TDD at 615-252-8599 by dates and times specified in the public notices.

