Citizen Participation

The state of Missouri constructs a thorough citizen participation plan that encourages citizens to participate in the development of the five-year consolidated plan and annual action plans. The citizen participation plan was developed in accordance with the requirements listed in 24 CFR Part 91.115 (Citizen Participation Plan for States). The plan provides citizens (including minorities, the disabled and non-English speaking persons), units of local government, and other interested parties a reasonable opportunity to comment on the plan and encourages them to do so.

Development of Consolidated Plan

1. Public notification before publication: Before the State adopts the consolidated plan, citizens, public agencies and other interested parties are given access to information about the programs involved in the plan, including the amount of assistance the State expects to receive and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low-to-moderate income and the plans to minimize displacement of persons and to assist any persons displaced. Before the draft 2013 -2017 Consolidated Plan was published, the State held an informational meeting on September 20, 2012 to inform the public of the plan to assess the housing and community development needs of the non-entitlement areas of the state. Notification of this meeting was provided to partner public agencies, units of local government, and other interested parties. The notification described the state agencies and programs involved in the Consolidated Plan process, as well as a brief description of information required for the plan and the public’s role at the meeting. The meeting also described the publication process of the Plan and the future opportunities for public input. Details of that meeting are addressed elsewhere in this report.

2. Publishing the plan with reasonable opportunity for public review: The State makes every effort to publish the proposed consolidated plan in a manner that affords citizens, units of general local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. To do this, the draft Consolidated Plan and draft Annual Action Plan were published and made available to the public on or around December 1, 2012. The plan was available on the DED website (www.ded.mo.gov) and the MHDC website (www.mhdc.com). To notify the public of the plans’ availability, public notification was provided via state agency websites and email listing the locations where the plans would be available as well as a schedule of upcoming public hearings. The announcement also explained that interested parties are given a reasonable opportunity to examine the contents of the plans and submit comments, as the State would also provide a copy of the plans to
interested parties upon request and to those that attend a public hearing. Comments would be accepted until January 15, 2013 (45 day time period). A press release was also issued statewide, notifying the public of the Consolidated Plan process, the opportunity to review the plan, and the schedule of public hearings.

3. **Public hearing before plan is published for comment**: The state conducted an information meeting before the proposed draft consolidated plan was published to discuss the housing and community development needs with interested persons. The meeting, as described below, was scheduled at a time and location convenient to potential and actual beneficiaries and with accommodations for persons with disabilities. Notification of this meeting was made available approximately three weeks prior to the hearing.

The meeting conducted on September 20, 2012, took place at the Harry S Truman Building in Jefferson City, Missouri, which is centrally located in the state and ADA accessible. There were no non-English speaking attendees at the hearing but in the event that non-English speaking persons were in attendance, the State was/is prepared to meet their needs so they are able to participate. Those in attendance received information about how the State planned on assembling the data for the Plan, as well as handouts detailing the projected budgets and activities anticipated by the programs covered by the plan: Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Continuum of Care (CoC), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). Attendees were asked to consider the information presented and offer comments or suggestions in the manner of their choice.

4. **Time period for comments**: The State provides approximately 45 days to receive comments from citizens and units of local government on the consolidated plan, as the plan is made available in early December and comments and questions are accepted until January 15. During that time period, the State schedules at least four public hearings around the state to distribute copies of the plan and discuss the plan with the public. The public hearings give the state the opportunity to present the content of the Consolidated Plan, the Action Plan, and receive and record comments from the public. All public hearing meeting places are scheduled in handicapped accessible meeting rooms and provisions for interpretation shall be made at all public hearings for non-English speaking residents if needed.
5. **The FY13 Public Hearing schedule is as follows:**

Brookfield – December 4, 2012
Fire Dept. Meeting Room
116 W. Brooks
10 a.m. – 12 p.m.

Jefferson City – December 4, 2012
Harry S Truman Building, Room 850
301 W. High Street
3 p.m. – 5 p.m.

Springfield – December 5, 2012
Missouri Career Center
2900 E. Sunshine
10 a.m. – 12 p.m.

Cape Girardeau – December 6, 2012
Osage Center
1625 N. Kingshighway
9 a.m. – 11 a.m.

6. **Consideration of comments:** The State considers any comments or views of citizens and units of general local government received in writing or orally at the public hearings, in preparing the final consolidated plan. A summary of these comments, including those not accepted and reasons therefore, will be attached to the final consolidated plan.

**Performance Reports**

1. The State provides reasonable notice and an opportunity to comment on performance reports made by the programs involved with the Consolidated Plan. Data contained in the performance reports is compiled and sent out approximately two months after the end of the program year. Copies of the actual performance reports are mailed to 20 different public agencies around the state, and notice of the performance report availability is made via mail to the Consolidated Plan mailing list. The public is given a 30 day comment period, and then the performance reports are submitted to HUD no later than June 1.

2. Comments received on the performance reports are recorded, and a summary of the comments is attached to the performance report.

**Requirements for Local Governments Receiving CDBG Funds**

1. Recipients of CDBG funds must comply with the State Citizen Participation Plan requirements as found in 24 CFR 570. All applicants and recipients of grant/loan funds shall be required to conduct all aspects of the program in an open manner with access to records on the proposed and actual use of funds for all interested persons. All records of applications and grants must be kept at the recipient’s offices and be available during normal business hours. Any activity of the Grantee regarding the CDBG project, with the exception of confidential matters relating to housing and economic
development programs, shall be open to examination by all citizens.

2. The applicant/recipient must provide technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals at the level of expertise available at governing offices. All application materials and instructions shall be provided at no cost to any such group requesting them.

Citizens shall be provided adequate and timely information, so as to enable them to be meaningfully involved in important decisions at the various stages of the program, including at least 1) the determination of needs, 2) the review of the proposed activities, and 3) the review of past program performance, in the following manner:

a. At least two public hearings shall be scheduled at times and locations felt to be most likely to make it possible for the majority of interested persons to attend without undue inconvenience, addressing the three items above. At least one hearing must be held to address items (1) and (2) above prior to the submission of the application for housing and/or non-housing needs. Item 3 must be addressed in a public hearing to review performance of the recipient in a previous program and must occur prior to closeout of any loan or grant for which performance evaluation has not occurred in a previous hearing.

b. Notification of any and all hearings shall be given a minimum of five full days in advance to allow citizens the opportunity to schedule their attendance. Notification shall be in the form of display advertisements in the local newspaper with the greatest distribution. Additional advertisement may be conducted by posting letters, flyers and any other forms which seem practical; however, publication is required. All hearings must be accessible to handicapped persons. Provisions for interpretation shall be made at all public hearings for non-English speaking residents if such residents are expected to be in attendance.

The chief elected official’s office shall receive and relate to appropriate persons or groups any views or proposals submitted to aforesaid office within the decision making time. Any criticism submitted in writing at any time should be answered in writing within fifteen working days by the chief elected official’s office. If the complaint is not resolved, it shall be referred to the governing body for final disposition.
Availability to the Public

The State will provide the Consolidated Plan, as adopted, substantial amendments, and the performance reports to the public, including materials in a form accessible to persons with disabilities, upon request. These documents are made available to the public electronically at www.ded.mo.gov and www.mhdc.com. The consolidated plan, annual action plan and amendments are also distributed at public hearings. All documents related to the consolidated plan are available upon request and will be provided to anyone requesting them.

Access to Records

Citizens, public agencies and other interested parties are given reasonable and timely access to the information and records relating to the State’s Consolidated Plan and the State’s use of assistance under the programs covered by the plan. Presentation materials, resources used to compile the information in the plan, comments compiled at public hearings, and all other related materials are available to the public upon request.

Complaints

To comply with the requirements regarding complaints, the State has designated an appropriate and practicable procedure to handle complaints from citizens related to the consolidated plan, amendments, and performance reports. Upon receiving a complaint, the State will provide a timely, substantive written response to written citizen complaints within a fifteen working day time period.

Needs Assessment

Needs Assessment Overview

The Housing Needs Assessment section shows that households at all income levels and household types are burdened with housing problems such as lacking kitchens or bathrooms, overcrowding, and cost burdens.

The data presented here suggests that for Missouri citizens, one of the most urgent needs is the availability of more affordable housing units. 2012 data from The Center for Housing Policy states that “for all households, including homeowners...housing and transportation together consumed an average of 48% of a households’ income.”

That same data compared the rise in housing costs to the rise in income by metropolitan area and found that in the St. Louis MSA, incomes rose 22% (2000-2010) while housing and transportation costs rose by 39%; housing costs were responsible for more than ½ of that 39%