CITY OF BOSTON

Citizen Participation Plan

February 2024

February

Mayor's Office of Housing
Chief and Director
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CITY OF BOSTON MAYOR'S OFFICE OF HOUSING

Citizen Participation Plan — February 2024

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FEBRUARY 2024

THE CITIZEN PARTICIPATION PLAN WAS AMENDED TO:

- remove reference to the expired "CARES Act Waivers" granted during the COVID-19 pandemic
- update the public notice procedures that a) expand electronic notifications, public postings and add a dedicated call line b) remove newspaper advertisements
- increase the trigger for what is considered a substantial amendment from a 1% to a 10% budget change
- add details and examples of how we engage residents, community organizations, policymakers, and other interested parties in the planning, allocation and evaluation of the HUD/CPD funded programs.

INTRODUCTION

The City of Boston receives annual allocations from the **Community Planning and Development Office (CPD) of the U. S. Department of Housing and Urban Development (HUD)** for four grant programs:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Program (HOME)
- Housing Options for Persons with AIDS (HOPWA)
- Emergency Solutions Grant (ESG)

These grants funds are managed and administered by the **Mayor's Office of Housing (MOH)** with the primary purpose of developing viable communities by promoting integrated approaches that provide decent housing, a suitable living environment, and expand economic opportunities for low- and moderate-income persons.

As the recipient of the HUD/CPD grant funds, the City of Boston is required to produce the following documents:

- **Consolidated Plan:** a five-year plan that documents the City's housing and community development needs, outlines strategies to address those needs, and identifies proposed program accomplishments with the HUD/CPD grants;
    - **Assessment of Fair Housing (AFH)**: this report is updated along with the Consolidated Plan and identifies various factors that may adversely affect fair housing choice in Boston and outlines an action plan to overcome these barriers

- **Annual Action Plan:** an annual plan that describes specific projects and activities funded with HUD/CPD grants that will be undertaken over the course of the upcoming program year

- **Consolidated Annual Performance and Evaluation Report (CAPER):** an annual report that evaluates the use of HUD/CPD funds.

The Citizen Participation Plan has been developed to provide residents, community organizations, policymakers, and other interested parties the opportunity to learn about and participate in the planning, allocation and evaluation of the HUD/CPD funded programs; and, to review and comment on each of the planning documents described above. The efforts detailed in this Citizen Participation Plan strive to give all residents an opportunity to:

- Review and provide feedback on the City's Consolidated Plan and Annual Action Plan, and eligible activities under the HUD programs;
- Identify and respond to priority needs;
- Identify and respond to proposed projects and the use of funds; and
- Review and comment on program performance.

CITIZEN PARTICIPATION PLAN REQUIREMENTS

Pursuant to the requirements of 24 CFR 91.105 and 24 CFR Part 5.158, the City of Boston hereby issues the following plan to provide for and encourage citizens to participate in the development of the City of Boston's Consolidated Plan, including substantial amendments, development or amendment of the Annual Action Plan, and the Consolidated Annual Performance and Evaluation Report. This plan amends and supersedes the City's existing Citizen Participation Plan, adopted in compliance with Section 104(a)(3) of the Housing and Community Development Act of 1974.

The City of Boston is required to adhere to this Citizen Participation Plan as the official mechanism for obtaining citizen input into the Consolidated Plan and Annual Action Plan process and during the administration of the programs covered by this Plan.

The goals of the Citizen Participation Plan are to encourage participation from the following populations:

- low-and moderate-income residents,
- people living in low-to-moderate income neighborhoods and any slum and blighted areas,
- persons with disabilities,
- communities of Black, Indigenous and People of Color (BIPOC),

- residents of HUD-assisted housing, including: resident advisory boards, resident councils and resident management companies,
- those living with HIV/AIDS,
- current or formerly homeless individuals and families,
- local and regional stakeholders, including the Continuum of Care* (CoC), businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations.

The City of Boston assures all residents that by adhering to the stated goals, residents will have the opportunity to learn about and participate in the planning, allocation, and evaluation of the Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report.

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*A *Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding from HUD for homeless families and individuals. Boston's CoC is coordinated by the Mayor's Office of Housing.*

PART A - DEVELOPMENT OF THE CONSOLIDATED PLAN AND ANNUAL ACTION PLAN

Boston will consult with public and private agencies, and with subject matter expertise in the categories listed below as part of the development of the Consolidated Plan, the Assessment of Fair Housing and Action Plan.

- Public and private agencies that provide assisted housing
- Health services
- Social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected populations
- Community-based and regionally-based organizations that represent protected class members
- Organizations that enforce fair housing laws
- Continuum of Care
- Public and private agencies that address housing, health, nutrition, social services, victim services, employment, or education needs of:
    - low-income individuals and families
    - homeless individuals and families, including veterans, youth and persons with special needs
- Publicly funded institutions and systems of care that may discharge persons into homelessness, such as:
    - healthcare facilities
    - mental health facilities
    - foster care and other youth facilities
    - corrections programs and institutions
- Business and civic leaders
- State and local health and child welfare agencies, including agencies that track housing units in which children have been identified as lead-poisoned
- Adjacent units of local government and regional governmental agencies, particularly agencies with metropolitan-wide planning and transportation responsibilities that go beyond a single jurisdiction, such as the Metropolitan Area Planning Council (MAPC)
- Boston Housing Authority
- Broadband internet service providers
- Organizations engaged in narrowing the digital divide
- Agencies whose primary responsibilities include the management of flood-prone areas, public land or water resources
- Emergency management agencies

The City of Boston encourages the participation of representatives of underserved populations including socioeconomically disadvantaged people, people of color, women and children, people with limited English proficiency, people with disabilities (including physical, hearing or visual impairment, behavioral health concerns, or learning disabilities), public housing residents, residents of predominantly low to moderate income areas (as defined by the Census), in areas designated by the jurisdiction as a revitalization area, or in a slum and blighted area, and in areas where HUD funds are proposed to be used. Specific accommodations will be made for any participating citizen so as not to limit their involvement as detailed in Part I: Language and Communications Access for City Services.

At least 30-days prior to adopting a Consolidated Plan or an annual Action Plan, the City of Boston will make available to residents, community organizations, policymakers, and other interested parties a draft of these Plans. As soon as feasible after the start of the public participation process the City will make the HUD-provided data and any other supplemental information the City intends to incorporate into its Plan(s) available to residents, public agencies and other interested parties. The data will be posted on MOH's website:
https://www.boston.gov/departments/housing/policy-development-and-research#plans-and-reports

The draft Plan(s) will include information on the amount of assistance Boston expects to receive (including grant funds and program income) from the HUD/CPD programs. The Plans will also include descriptions of each program that the City plans to undertake with the HUD/CPD funds, the estimated amount of funds that will benefit low- and moderate-income persons and plans to minimize displacement of residents.

The City will consider any comments or views of citizens received in writing, by email, orally at the public hearings or by phone call. At the conclusion of the public comment period, the City will prepare a summary of all comments received, those comments accepted, those comments not accepted, and the reasons any comments were not accepted. Consideration of and response to any comments received will be described in the City's final submission to HUD.

It is anticipated that the draft Consolidated Plan and/or Action Plan will be issued for public comment on or about the second week of April of each year and the plans shall be adopted and submitted to HUD no later than the 15th of May of each year.

After HUD approves the Consolidated Plan and/or annual Action Plan, the City will make the document available to the public by posting the final Consolidated Plan or Action Plan on the MOH website: MOH Plans Reports and Notices. The City will provide the

Consolidated Plan and Fair Housing Strategies to the Boston Housing Authority so that the Public Housing Authority (PHA) can make this information available at their annual public hearing required for the PHA plan.

PART B - PUBLIC NOTICES AND COMMENTS ON THE CONSOLIDATED PLAN, ANNUAL ACTION PLAN, SUBSTANTIAL AMENDMENTS AND CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

1. The City will publish a notice of the opportunity for public comment on the draft Plans and Reports on the MOH website: MOH Hearing and Public Comment. MOH will also post these documents on the website in a format available for citizens to examine or download. Citizens will be provided with a 30-day period to comment on the Plans (15-day period on the CAPER). Comments on the Consolidated Plan, Annual Action Plan, Substantial Amendment and CAPER must be submitted to the Mayor's Office of Housing via email (mohcomments@boston.gov), by calling 617-635-0363 or by mail to City of Boston, Mayor's Office of Housing, Attn: Public Comments, 12 Channel Street 9th Floor, Boston, MA 02210.

2. The City will establish and maintain a Policy News email list of residents, community organizations, policymakers, and other interested parties for the purpose of providing notice of the issuance of such Plans or of any public hearings related to the development of the Plans. The City will send electronic notice of any such issuance to this email list not less than 14 days prior to public hearings; and, on the day that the Plan is issued for public comment and available on the Department's website. The link to sign up for Policy News is posted here: https://www.boston.gov/departments/housing/policy-development-and-research#stay-connected

3. The City will follow a plan to reach out to low-and moderate-income residents, residents with limited English proficiency and persons with disabilities. Efforts include sharing notices of the issuance of such Plans, or of any public hearings related to the development of the Plans, to Boston Public Library sites, Boston Center for Youth and Family sites, the Mayor's Office of Community Engagement, the Mayor's Office of Immigrant Advancement, the Office of Economic Opportunity and Inclusion, the Office of Workforce Development, the Disabilities Commission, the Boston Housing Authority and any of the 40 plus Public Information Officers for City Departments that utilize HUD funds to provide programs and services. It is expected that these partners will send out this information to all of their contacts via emails, newsletter and social media. (Please see the next item.)

4. The City will publicize the opportunity for public comment on the draft Plans and Reports through the City of Boston's Public Notice website (https://www.boston.gov/public-notices) and will also utilize all social media assets available to it, including all MOH platforms such as Instagram, Facebook, and X (formerly known as Twitter.)

PART C - SUBSTANTIAL AMENDMENTS

The City will use the following criteria for determining what changes in the jurisdiction's planned or actual activities constitute a Substantial Amendment to the Consolidated Plan or Action Plan:

1. To amend the Citizen's Participation Plan.
2. To make a change in the Consolidated Plan allocation priorities from high to low or low to high.
3. To carry out an activity, using funds from any program covered by the Consolidated Plan not previously described in an Action Plan or
4. To change the purpose, scope, location, or beneficiaries of an activity.
5. If the total amount of CDBG (including Section 108, Economic Development Initiative {EDI} or Brownfields EDI), HOME, ESG and HOPWA funds allocated to a program is increased or decreased by an amount that is more than 10% of the aggregate budget for the program during that program year with the following exemption:

    - *Changes not Requiring a Substantial Amendment:*

    - A budget amendment where the actual dollar amount of the change involved is less than $100,000 or 10% of the program's funding allocation, whichever is greater, will be considered a non-substantial budget amendment. For such amendments the City will provide notice to HUD and the public but will not provide a 30-day public comment period.

Public notice and comment standards detailed in Part B of this Citizen Participation Plan will be upheld for Substantial Amendments.

The City will consider any comments or views of citizens received in writing, orally, or by email, in preparing the final Substantial Amendment to the Consolidated Plan or Action Plan for submission to HUD. A summary of these comments or views, and a summary of any comments or views not accepted and the City's reasons therefore, shall be attached to the Amendment submitted to HUD.

After the Substantial Amendment is reviewed and approved by HUD, the City will make the document available to the public by posting on the MOH website: MOH Plans Reports and Notices

PART D - CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORTS (CAPER)

At least 15-days prior to submitting to HUD any CAPER on the Consolidated Plan or Action Plan, the City of Boston will make available to residents, community organizations, policymakers, and other interested parties an opportunity to examine and comment on the draft CAPER.

The City will consider any comments or views of citizens received in writing or orally by the specified deadline in preparing the final CAPER. A summary of these comments or views shall be attached to the CAPER submitted to HUD.

It is anticipated that the draft CAPER will be issued for public comment on or before the 15th of September of each year and the report shall be adopted and submitted to HUD no later than the 30th of September of each year.

The City will make the document available to the public after HUD approves the CAPER by posting on the department's website MOH Plans Reports and Notices

Public notice and comment standards detailed in Part B of this Citizen Participation Plan will be upheld for the CAPER.

PART E - PUBLIC HEARINGS

The City will hold a minimum of two public hearings each year to obtain citizens' views and to respond to proposals and questions during different stages of the development of the Consolidated Plan or Action Plan. Together, these hearings will address housing and community development needs, development of the proposed activities and review of program performance.

1. The City will hold a first in-person hearing or hearings for the purpose of obtaining citizen views regarding housing and community development needs and priorities for the coming year and to review program performance for the past year. This will allow the Program to obtain the views of residents on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing, before publication. The hearing will be held at least 60 days prior to issuance of the draft Consolidated Plan and the Action Plan.

2. The City will hold a second hearing or hearings for the purpose of accepting citizen views regarding the draft Consolidated Plan, or Action Plan. The hearing will be held during the 30-day comment period on the draft Plans. The draft Plans will be available for review at least ten days before the scheduled hearing.

3. The public notice and comment standards outlined in section B of this Citizen Participation Plan will be followed to solicit attendance at public hearings.

4. The hearings will be held on a weekday during day or early evening hours at a convenient and centrally located public space that is accessible for disabled persons and convenient to public transportation such as the main branch of the Boston Public Library or other such locations.

PART F - ACCESS TO RECORDS

The City will provide online access at MOH Plans Reports and Notices to information and records relating to Boston's Consolidated Plan and the use of assistance under programs covered by the Consolidated Plan during the preceding five years.

Requests for printed materials must be made in writing via email to: mohcompliance@boston.gov , by call 617-635-0363, or to the Compliance Unit, Mayor's Office of Housing, 12 Channel Street, Suite 901, Boston, MA, 02210. Where practicable, the City will respond to such requests in writing within 15 working days. Requests for information which is not readily available, or which will require additional research or production of new documents, may take longer. In such cases, the City will respond in

writing within 15 days stating whether or not the information is available and the timeline for completing the request.

PART G - TECHNICAL ASSISTANCE

Upon written request, the City will provide access to technical assistance to groups' representative of low-and moderate-income residents that request such assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. The City may choose to provide such assistance with its own staff, with consultants under contract to the City under any of its housing and community development programs, or refer the group making the request to any of the organizations funded by the U.S. Department of Housing and Urban Development to provide such assistance. The assistance provided will not include the provision of funds to the groups.

PART H - COMPLAINTS

The City adopted the following procedures for handling complaints from citizens related to the Consolidated Plan, Annual Action Plan, Amendments and Performance Reports:

- All such complaints are to be made in writing to the Compliance Unit, Mayor's Office of Housing, 12 Channel Street, Suite 901, Boston, MA, 02210, or by email: mohcompliance@boston.gov
- The Compliance Unit will coordinate the preparation of a substantive written response to every written citizen complaint within 15 working days of receipt of the complaint, if practicable. The response will include the name of a contact person to facilitate any additional follow-up regarding the complaint.

PART I - LANGUAGE AND COMMUNICATIONS ACCESS FOR CITY SERVICES

The City of Boston follows a Communication Access Ordinance to ensure that City services are accessible to all residents regardless of linguistic barriers or physical or visual impairments. The Ordinance established a communication access policy wherein each department defines customized guidelines to ensure all residents have meaningful access to services and opportunities to play a critical role in decision making.

Accessible: The City will meet all the requirements of Section 504 and the Americans with Disabilities Act. All public meetings will be held in handicapped accessible buildings. Written material will be available for persons with hearing disabilities and a staff person will be available to read to anyone who is sight-impaired. If any additional accommodations are needed for persons with disabilities, an advance request of at least seven (7) days prior

to the public hearing date is required. The City will seek to accommodate other needs to the best of its ability, upon advance request.

Multilingual: MOH provides assistance for non-English speaking persons in Cantonese, Mandarin and Spanish at the required HUD hearings. Interpreter services in other languages are provided upon advance request of at least seven (7) days prior to the hearing date. The City will seek to accommodate other language interpretation needs to the best of its ability, upon advance request. The current threshold languages for the City of Boston are Spanish (Latin American), Haitian Creole, Mandarin, Vietnamese, Cantonese, Portuguese (Brazilian), Cabo Verdean Creole, Russian, French (European), Arabic (Standard) and Somali. For these 11 languages, the threshold is met with at least 5% of the neighborhood population or 1,000 neighborhood residents who were born in a country in which the given language is spoken.

The Language and Communication Access (LCA) office maintains multilingual resources and demographic data by language. The LCA website:
https://www.boston.gov/departments/language-and-communications-access
MOH consults the LCA guidance available for City agencies to assist them in determining when community notifications and public advertisements for programs and development projects are translated into other languages as appropriate for limited-English proficient residents in the impacted neighborhood. Verbal communication with limited English speakers is managed with MOH bilingual staff and the use of third-party interpretation services provided by contracted services and equipment from the LCA Office, including iPads that provide access to live interpretation services for consumer facing divisions of the Mayor's Office, including the Office of Housing Stability, and the Boston Home Center.

The City will use available Census data and consultations to assess needs for individuals with limited English proficiency to encourage participation, such as the need for translation services and other vital documents.

PART J - MINIMIZING DISPLACEMENT

The City does not have, nor does it anticipate funding any activities that will displace any residents or businesses. If displacement does occur, the residents or businesses displaced would be entitled to compensation and/or assistance under applicable federal laws. Should the need for displacement ever arise, the City will officially notify the residents or businesses expected to be displaced as soon as practicable following approval of the

activity. The notice will include a description of the proposed action, a discussion of how they might be affected, and information concerning their rights and benefits.

OVERVIEW OF PLANNING DOCUMENTS

Section	Drafts for Review	Posted Notices	Public Hearing/s	Other Outreach
Consolidated Plan (w/Affirmative Fair Housing) and Annual Action Plans	Full draft posted for a minimum 30-days	Same day as draft Plan is posted and at least 14 days prior to Public Hearings	Hearing #1 at least 30 days prior to posting a draft Hearing #2 during the comment period	Departmental Listservs; Public locations + social media Consultations w/ HUD required groups
Substantial Amendments	Amendment posted for a minimum 30-days	Same day as Amendment posted	None	Departmental Listservs; Public locations + social media
CAPER	Full draft posted for 15-days	Same day as CAPER posted	None	Departmental Listservs; Public locations + social media
Citizen Participation Plan (CPP) and any Amendments to CPP	Amendment posted for a minimum 30-days	Same day as Amendment posted	None	Departmental Listservs; Public locations + social media

ADDENDUM A - PUBLIC COMMENTS

The City would like to thank the following individuals and organizations for their written comments on the Citizen Participation Plan (CPP) Amendment. A summary of the public comments received is provided below. Comments are grouped by issue and similar comments may have been combined or paraphrased.

E-A Bailey, President of the Evergreen-Kenney Neighborhood Association
M. Glynn, Hancock Street Civic Association
Residents: T. Lopez, B. Higgins
L. Downie, President of Pine Street Inn

Comment	Response
Issue: Relying on electronic communications and website postings is not effective and excludes the residents that the federal funds are intended to serve.	
Three commenters voiced strong concerns that the City was excluding the most vulnerable residents, particularly residents who are low-income, elderly, people with disabilities, immigrant populations and residents of disadvantaged areas, from participating in the process due to the CPPs reliance on electronic communication. Further, many of the residents that are targeted for the Federal funds do not have access to the internet or have language and literacy barriers that the CPP does not accommodate for those needs.	The revisions in the CPP plan expand efforts to encourage participation from the City's diverse population. The CPP includes specified guidelines to ensure that residents can have equal access to the grant programs covered by the HUD funds. MOH consults with the Language and Communication Access office for guidance on multilingual needs, accessibility needs, interpretation services and equipment needs. Translated materials are shared with diverse City of Boston departments serving low to moderate-income residents, seniors, immigrants and people with disabilities for distribution and/or posting on informational boards at neighborhood locations such as libraries and community centers.
Issue: Concerns that oral comments outside of public hearings are not accepted.	
A commenter voiced concern that the CPP does not specify that oral comments are accepted in addition to testimony at a public hearing and comments submitted by email.	The City thanks the commenter for drawing attention to that omission in the CPP. There is a dedicated call number at the Mayor's Office of Housing to accept oral comments and the CPP is updated to include that information.

The same commenter requested that community organizations and Boston Public Schools also be notified on HUD matters.	The City shares opportunities for resident input with a host of established partnerships. One example is the citywide network of 40+ information officers and/or Directors of Communication at other City of Boston departments. Another method is utilizing departmental listservs. For example, community organizations are notified via the Neighborhood Services listserv. The Boston Public Schools Public Information Officer disseminates information to the school community.
Issue: The City has no real interest in engaging with nor hearing the opinions of residents.	
A resident of Charlestown expressed his opinion that "Citizen Participation" is insincere and only undertaken to meet the federal requirement for the funding.	While the CPP is required by HUD, the City of Boston goes above and beyond the HUD requirements to engage with the residents for whom these HUD funds are intended to serve.
Issue: Support for expanding electronic notifications and public postings.	
Pine Street Inn wrote in support of the CPP utilizing advances in communication as most people acquire information online.	Thank you. This CPP revision removes the need for expensive legal notices in newspapers that get little notice by the residents we want to reach.
Issue: Support for increasing from 1% to a 10% budget change for an Amendment	
Pine Street Inn wrote in support of the proposal to increase the requirement from 1% to 10% budget change for a substantial amendment.	Thank you. Increasing the threshold for a substantial amendment is encouraged by HUD and is warranted when the budget change is 10% or greater.