Background
In response to the Coronavirus Pandemic (COVID-19) the United States Department of Housing and Urban Development (HUD) has notified the City of Denison that it will receive an allocation of $173,668 of Community Development Block Grant Program – Coronavirus Response funds (CDBG-CV) to be used to prevent, prepare for, and respond to COVID-19. This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, which was signed by President Trump on March 27, 2020, to respond to the growing effects of this historic public health crisis.

The City of Denison’s federal Annual Action Plan details the funding strategy for the Community Development Block Grant (CDBG) program each year. The Annual Action Plan implements a jurisdiction’s multi-year Consolidated Plan and is developed through significant citizen participation, analysis, and planning. The CDBG-CV funds will be incorporated into the City’s 2019 Annual Action Plan through a Substantial Amendment.

Funding Requests
Below is a summary of the proposed budget provided by the Community Development Department as of August 27, 2020:

**Project Name:** Public Services – CARES Act – CDBG-CV ($156,302)
- **National Objective:** LMI – Limited Clientele
- **CDBG Eligible Activity:** Public Service
- **Project Description:** Provide financial assistance to establish, stabilize, and expand microenterprises that provide education, medical, food delivery, cleaning, and other services to support health and childcare. Funding may go toward multiple public service agencies that are providing public services that prevent, prepare for, and respond to the coronavirus pandemic.

**Project Name:** Planning and Administration ($17,366)
- **National Objective:** LMI – Limited Clientele
- **CDBG Eligible Activity:** Planning and Administration

Amendment to the Citizen Participation Plan
The proposed changes to the City’s Citizen Participation Plan are as follows:

**Citizen Involvement During Emergency Situation**
In the event that the conditions or urgent needs of a national, state, or local emergency limit the City’s ability to carry-out the citizen participation process outlined in this Citizen Participation Plan (such as a natural disaster, infectious disease outbreak such as COVID 19, or other event that is declared an emergency by local, state, or federal officials); the City hereby establishes expedited procedures for citizen involvement. These expedited procedures may apply to all...
HUD-related plans and reporting documents, including the Consolidated Plan, Annual Action Plan, CAPER, Fair Housing reports, and substantial amendments.

- Any required public notice and comment period may be reduced to five (5) days in duration, or the minimum number of days advised by any HUD waiver of citizen participation requirements.
- If in-person public hearings are not allowed for health and safety reasons cited by national, state, or local authorities, public hearing requirements may be met with virtual public hearings if such virtual hearings provide:
  o Reasonable notification and access for citizens,
  o Timely responses from local officials to all citizen questions and issues, and
  o Public access to all questions and responses.
- Documents and reports should be made available for public review as defined within the City’s current Citizen Participation Plan. In the event that conditions prohibit hard-copy distribution of documents and reports, the City will make such materials available upon request. HUD may issue further or alternative guidance for citizen participation during a national, state, or local emergency event, in which case such guidance from HUD will supersede and replace the expedited process outlined herein.

**Public Process**

The City of Denison will be holding a public hearing regarding a proposed amendment to the City’s 2019/2020 Action Plan and Citizen Participation Plan. Due to the COVID-19 pandemic, this public meeting will take place via teleconference on August 27, 2020 at 11:00 a.m. via Conference Call Number 1-877-309-2073, Participant Passcode 114-336-885. The purpose of said hearing is to receive input towards the proposed amendment involving the use of Community Development Block Grant Coronavirus (CDBG-CV) funds. Please call 903-465-2720 x 2519 between the hours of 8:00 am and 4:00 pm prior to the public meeting for instructions on providing public comment to this public meeting remotely.

The City of Denison will provide a public notice in the newspaper advertising a 5-day public comment period as part of the Citizen Participation Plan requirements. In order for timely response to the COVID-19 emergency, HUD has reduced the required public comment period to 5 days.

The City of Denison will accept public comment during the five (5) day public comment period beginning on September 2, 2020 through September 7, 2020. Citizens are asked to provide comment on the Substantial Amendment to the 2019/2020 Annual Action Plan, proposed use of CDBG-CV funds, and proposed amendment to the Citizen Participation Plan.

A copy of the 2019/2020 Action Plan, draft of the CDBG-CV Substantial Amendment Summary and Citizen Participation Plan will be made available to review and posted on the City’s website at
https://www.cityofdenison.com/community-development/page/community-development-block-grant. Due to the COVID-19 pandemic, Denison municipal buildings are currently closed to the public. Public comments can be e-mailed to the Community and Development Department at fwinfrey@cityofdenison.com or can be mailed to the City of Denison Community and Development Services Department, located at 300 W. Main P.O. Box 347, Denison, TX 75020. For more information call 903-465-2720 x 2519. Due to the COVID-19 pandemic, hard copies will not be made available at Denison municipal buildings for review during the public comment period; however, hard copies may be available upon request.

It is anticipated the Denison City Council will take action to approve the Amendments to the Annual Action Plan and Citizen Participation Plan at a Regular Meeting scheduled for September 8, 2020 at 6:00 p.m. at City Hall, 300 West Main Street, Denison, Texas 75020. For more information on this meeting please call 903-465-2720 ext. 2519 or https://www.cityofdenison.com/community-development/page/community-development-block-grant

The City will provide technical assistance to citizens and groups representative of persons of low and moderate income that request such assistance in the review of program activities and program amendments. In addition, the City will make adequate and reasonable provisions to assist non-English speaking residents in interpreting program opportunities and provisions on a case-by-case basis, as well as provide auxiliary aides and services for individuals with disabilities. Requests for special accommodations must contact the Community and Development Services Department at the contact information above.
Denison, TX  
CDBG-CV Substantial Amendment

**Schedule**

<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
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<tbody>
<tr>
<td>August 12, 2020</td>
<td>Send Public Hearing Notice/Comment Period Notice/Adoption Meeting Notice; City finalize CDBG-CV budget</td>
</tr>
<tr>
<td>August 15, 2020</td>
<td>Submit Waiver Letter Request to Regional HUD Office</td>
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<tr>
<td>August 16, 2020</td>
<td>Publish Public Hearing Notice/Comment Period Notice/Adoption Meeting Notice</td>
</tr>
<tr>
<td>August 21, 2020</td>
<td>Complete Draft Substantial Amendment Summary</td>
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<tr>
<td>August 27, 2020</td>
<td>CDBG-CV Public Hearing</td>
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<tr>
<td>September 2, 2020</td>
<td>Begin 5-Day Comment Period – Make Draft Substantial Amendment Summary and Amended Citizen Participation Plan Available for Public Comment</td>
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<tr>
<td>September 7, 2020</td>
<td>End 5-Day Comment Period</td>
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<tr>
<td>September 8, 2020</td>
<td>Adoption of Substantial Amendment by City Council</td>
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<tr>
<td>September 9, 2020</td>
<td>City Manager to Sign SF424, SF424D, and Certifications</td>
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<tr>
<td>September 10, 2020</td>
<td>Submit Substantial Amendment within IDIS</td>
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<tr>
<td>Project Name</td>
<td>Project Description</td>
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<td>-------------------------------------------</td>
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<tr>
<td>Public Services - CARES Act - CDBG-CV</td>
<td>Provide financial assistance to establish, stabilize, and expand microenterprises that provide education, medical, food delivery, cleaning, and other services to support health and child care.</td>
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<tr>
<td>Administration/Planning - CARES Act - CDBG-CV</td>
<td>Administration of the CDBG-CV funding.</td>
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Total $173,668
I. Introduction

This plan describes how the City of Denison will involve citizens in the planning, implementation and assessment of its Community Development Block Grant (CDBG) program. Involving citizens is more than a formality or program requirement, it is the heart of the community development process. Citizens know their own needs and their advice and participation is essential to the success of the program. Recognizing that citizen participation is a two-way flow of communications, it is expected that both citizens and city officials will gain a greater understanding of community and neighborhood concerns and of one another through the citizen participation process.

Five (5) basic standards will guide the City’s citizen participation process. These include:

(1) Encourage involvement of citizens, especially residents of low-income neighborhoods to participate in the development of the annual plan and the performance reports.

(2) Openness and freedom of access to meeting, information, and records.

(3) Adequate and timely information and response to complaints.

(4) Obtaining the views and proposals of citizens at all stages of the community development program.

(5) Provision of technical assistance to both low-income residents in predominantly low-income neighborhoods and community groups servicing or representing low- and moderate-income residents.

II. Citizen Participation Coordinator

The administrative authority for the operation of the Community Development programs will rest with the office of the City Manager. The Community Development Director will serve as the approving office for program implementation. In order to provide consistency and a single contact point, the Director of Community Development (DCD) will be responsible for ensuring that this plan is carried out and that the City’s citizen participation efforts are carefully documented and monitored. The DCD will serve as an advisor and secretary to the Community Development Block Grant Steering Committee, keeping minutes, contacting committee members of public hearings and meetings, and providing general information to the members on a timely basis. The DCD may be contacted during regular business hours at (903) 465-2720, extension 2466 at City Hall. All requests for information and/or assistance will be channeled through the DCD.
III. Citizen's Advisory Committee

In order to increase the amount of citizen participation in the planning and implementation of the community development programs, the City Council has established a Community Development Block Grant Steering Committee. This committee shall consist of up to seven (7) members who are directly appointed by each Council member and broadly representative of the community. Insofar as practical, the committee shall include some residents of low- and moderate-income areas of the City of Denison. This committee will meet at least four (4) times a year to review the community development program.

The general duties of Steering Committee will include:

1. Holding public hearings to solicit community input and assess needs.

2. Assessing and determining community needs at both city-wide and neighborhood levels and developing realistic goals and objectives to meet these needs for the Annual Plan.

3. Evaluating and recommending proposals from community organizations requesting funding and assistance.

4. Developing specific project proposals for community development in the Annual Plan.

5. Developing goals for housing assistance by type and location in the Annual Plan for recommendation to the City Council, and

6. Monitoring current program activities and evaluating past program performance.

7. Implementing CDBG programs and modifications as determined by community assessment and HUD program requirements.

IV. Public Notification

The CDBG program is intended to principally benefit very low- and low-income persons. Such persons are often not involved in the decision-making process. Therefore, special attention will be given to obtaining their participation. Minorities and elderly citizens will be targeted because these groups tend to have a disproportionate number of very low- and low-income households. However, the process will not exclude other citizens of the community because their support is also critical to the success of the many community development programs and the revitalization process of the targeted neighborhoods. For example, involvement of the business community is essential for the private investment in community development areas, key public officials and community leaders are needed
to generate support and involvement, and the media is needed to publicize events and encourage support.

Citizens, particularly very low- and low-income citizens, will be encouraged to become involved in the identification of community development and housing needs for inclusion in the City’s Annual Plan submission.

A. Publicizing Efforts. In order to involve the citizens, the City of Denison will first publicize all its community development program activities. To accomplish this, the DCD shall be responsible for insuring that timely and descriptive notices are given. Public releases of all public hearings will be given through the conventional methods of newspaper, radio and television announcements and bulletin board posting at City Hall. Additionally, informal methods of notification will be utilized whenever practical. These may include:

1. Posting notices at various public places frequently visited by very low- and low-income residents, e.g., laundries, grocery stores, and local offices of the Texas Department of Human Services, post office, and the Denison Public Library.

2. Mailing fliers to special community service agencies that assist handicapped, elderly and low-income persons; and

3. Contacting local neighborhood and church leaders that are located in or near the periphery of the designated neighborhood revitalization area.

As a minimum, the notices shall be easily readable type and published in a non-legal section of the newspaper and shall state the date, time, place, and general topics to be considered. Such notices will be published in the official newspaper of the City of Denison, being the Herald Democrat, at least ten (10) days prior to the public hearing or community meeting. Non-English-speaking persons or persons with disabilities who plan to attend the meeting and who may need assistance are requested to contact the office of the City Secretary (903) 465-2720 three (3) working days prior to the meeting so that appropriate arrangements can be made.

B. Public Hearings and Meetings. The DCD will initiate, schedule and publicize any public hearings or neighborhood meetings to be held. The following meeting places have been chosen because they are in areas where a large percentage of very low- and low-income persons have been identified to reside:

Denison City Hall, 300 West Main Street
Denison Public Library, 300 West Gandy
The Community Development Block Grant Steering Committee will conduct all neighborhood meetings at City Hall. These meetings will be typical of "community" meetings where everyone will be given an opportunity to participate on an informal basis. The objective of these meetings will be for city staff and Community Development Block Grant Steering Committee members to provide basic information, conduct community meetings, and to obtain citizen input through dialogue. The meetings will be held at times to accommodate people who are working during the day or evening shifts. The first series of meetings will be conducted during the planning stages of the Consolidated/Action Plan. The second series of meetings will be held during the program year to address any issues raised by the public regarding the implementation of the program.

V. Technical Assistance

The Office of Community Development will provide technical assistance to residents of blighted neighborhoods so that they may adequately participate in the process of planning, implementing and assessing the community development program. Technical assistance will also be available for assisting community development organizations which serve or have programs in the very low- and low-income areas in developing their proposals for CDBG funding and assistance.

The technical assistance will be in the form of free typing services for CDBG related proposals and requests for funding and/or assistance where needed, review and analysis of proposals by city staff specialists (i.e., City Attorney, Building Official, Director of Community Development, etc.) the use of public meeting rooms, and access to program information. Technical assistance may be offered on one-to-one sessions, group training, or at community meetings an/or workshops. If staff capability does not exist to handle a request within a reasonable time period or an expenditure of funds is required, then the request will be routed through the City Manager to determine what action can be taken to more expeditiously resolve the issue.

VI. Depositories for Program Records

The following documents will be deposited at the Denison Public Library at 300 West Gandy, and in the Office of Community Development at 300 West Main.

(1) The Citizen Participation Plan
(2) The proposed and approved grant application
(3) The annual Grantee Performance Report
(4) The Consolidated Plan
These documents are provided at these locations for public review. The Director of Community Development may also provide other program documents for public inspection at these locations as deemed appropriate.

VII. Program Planning & Development of Applications

When planning for a CDBG application begins for a new fiscal year the City of Denison will undertake the following actions:

A. Notice of Neighborhood Meetings. When necessary, a notice of neighborhood planning meetings at the Denison City Hall will be published in the *Herald Democrat*. The meetings will be conducted by the Community Development Block Grant Steering Committee and the DCD to provide program information and to offer technical assistance to citizens and community organizations. This notice will be published at least ten (10) prior to the meeting(s) in the non-legal section. This notice will contain:

1. The total amount of CDBG funds available for community development and housing activities, including planning and administrative costs;

2. The date, time, place, and general topics to be considered at the meeting.

3. Non-English-speaking persons or persons with disabilities who plan to attend the meeting and who may need assistance are requested to contact the office of the City Secretary (903) 465-2720 three (3) working days prior to the meeting so that appropriate arrangements can be made.

B. Neighborhood Meetings. When necessary, the neighborhood planning meetings will be held at Denison City Hall in order to receive suggestions from citizens for projects and to obtain their views. Oral suggestions will be accepted at these meetings and written project proposals will followed to the DCD within three (3) working days of the meeting. If any written proposal is received prior to the neighborhood meetings, it will be presented and discussed at the meetings. General information will be given at the meetings either in the form of a handout or in an audio/visual presentation. Such information will include:

1. The amount of CDBG funds available.
(2) The type of activities that may be undertaken with these funds and the kind of activities previously funded in Denison.

(3) The City's plan to minimize displacement, even though no displacement is expected.

(4) The processes to be followed in the application process, including the schedule of meetings and hearings.

(5) The role of citizens in the program; and

(6) A summary of other important program requirements and information.

The DCD shall be responsible for preparing this information. Also, a register of all persons attending the meeting and minutes of the meeting will be recorded.

C. Committee to Review and Recommend Proposals. After consideration of all the suggestions and proposals for community development and housing projects presented at the neighborhood meetings, the Community Development Block Grant Steering Committee will then rank or prioritize the eligible projects and submit their recommendations to the City Council. This may be done at the neighborhood meetings or at a subsequent meeting. The Steering Committee can adjourn into Executive Session to discuss the rankings.

D. Public Hearings. Following the neighborhood planning meetings, the City Council will hold two public hearings to consider and review the recommendations from the Community Development Block Grant Steering Committee and to hear citizen comments. At these public hearings, citizens and community organizations will be given the opportunity to formally present their proposals to the City Council for final consideration.

Following the first public hearing, the DCD will prepare a notice of the proposed final statement of community development objectives and a summary of the proposed consolidated annual plan and have it published in the Herald Democrat. The notice will advise interested parties that a copy of the application is on file in the Office of Community Development and the Denison Public Library for public review. It will also state that any citizen may submit any comments on the proposed statement and summary of proposed consolidated annual plan for consideration prior to the final (second) public hearing and that such comments shall be directed to the Office of Community Development.
A summary of these views will be attached to the final consolidated annual plan, amendment of the plan or performance report.

A second public hearing will be held prior to actual submission of the CDBG annual plan to consider any public comments regarding the proposed statement of community development objectives and projected use of funds. After consideration of these comments, the City Council may modify the proposed annual plan, if deemed appropriate. A thirty (30) day citizen comment period is required on the plan, amendments or reports that are to be submitted to the Department of Housing and Urban Development (HUD) before the submission of the annual plan and reports.

Both public hearings will be held in the City Council Chambers at the Municipal Building, 300 West Main Street, Denison, Texas. At least ten (10) day notice shall be given prior to the public hearings.

E. Notice of Submission of Application (Final Statement). Upon submission of the annual plan and reports to HUD, notice that it has been submitted will be published in the Herald Democrat. This notice will advise interested parties that a copy of the annual plan and reports are on file in the Office of Community Development and the Denison Public Library for public review. The notice shall also indicate that an objection to the application can be filed with the City in the Office of Community Development. The DCD will respond to any written complaint or objection within fifteen (15) days.

VIII. Program Implementation

A. Quarterly Meetings. The DCD will continue to meet with the Community Development Block Grant Steering Committee, community agencies and organizations, and interested citizens throughout the program year as the approved CDBG is being implemented. The Community Development Block Grant Steering Committee shall hold a minimum of four (4) meetings for the purpose of reviewing the overall status of the program. These meetings will be held in the Council Chambers to inform citizens of the progress and to allow citizens and neighborhood groups an opportunity to voice concerns. Notice of these meetings shall be given in the same manner as other previously identified in this plan.

B. Program Amendments. If reprogramming of funds becomes necessary, citizen comments and suggestions will be solicited. The City of Denison has identified the criteria for determining what constitutes a substantial change in the planned or actual activities that requires and amendment to the plan. A substantial change to the purpose of a project would constitute a totally different purpose that would
become a new project. A substantial change to the scope of a project would be a monetary change of 10% of the overall cost of the project. Such amendments may be presented to the Community Development Block Grant Steering Committee at any of the four meetings or at a special called meeting of the Community Development Block Grant Steering Committee. Following this meeting, the Committee will submit its recommendation to the City Council on the matter. The City Council will act on the proposed amendments at a subsequent public hearing in which proper notice is given in accordance with Article IV-A hereof. Reprogramming of funds may be necessitated by cost overruns, unforeseen circumstance, or low bids. There will be a 30-day comment period before the amendment is sent to HUD.

IX. Program Assessment

A. Consolidated Annual Performance and Evaluation Report (CAPER). An annual performance report and evaluation report is submitted to HUD no later than ninety (90) days following the end of each program year. This report includes progress on planned activities, persons benefiting, housing assistance provided, level of citizen participation, and evidence of equal opportunity compliance. A copy of this report will be on file in the Office of Community Development for public inspection.

Additionally, copies are filed at the Denison Public Library. There will be a 15-day comment period before the CAPER is sent to HUD.

X. Citizen Involvement During Emergency Situation

In the event that the conditions or urgent needs of a national, state, or local emergency limit the City’s ability to carry-out the citizen participation process outlined in this Citizen Participation Plan (such as a natural disaster, infectious disease outbreak such as COVID 19, or other event that is declared an emergency by local, state, or federal officials); the City hereby establishes expedited procedures for citizen involvement. These expedited procedures may apply to all HUD-related plans and reporting documents, including the Consolidated Plan, Annual Action Plan, CAPER, Fair Housing reports, and substantial amendments.

A. Any required public notice and comment period may be reduced to five (5) days in duration, or the minimum number of days advised by any HUD waiver of citizen participation requirements.

B. If in-person public hearings are not allowed for health and safety reasons cited by national, state, or local authorities, public hearing requirements may be met with virtual public hearings if such virtual hearings provide:
(1) Reasonable notification and access for citizens,
(2) Timely responses from local officials to all citizen questions and issues, and
(3) Public access to all questions and responses.

C. Documents and reports should be made available for public review as defined within the City’s current Citizen Participation Plan. In the event that conditions prohibit hard-copy distribution of documents and reports, the City will make such materials available upon request. HUD may issue further or alternative guidance for citizen participation during a national, state, or local emergency event, in which case such guidance from HUD will supersede and replace the expedited process outlined herein.

XI. Citizen Complaints

In addition to participating in the process of planning, implementation, and program assessment, individual citizens groups may have specific complaints about a particular aspect of the local CDBG program. Such complaints may be registered in the Office of Community Development, either in person, by telephone or in writing. Any complaints received will be responded to within writing within fifteen (15) working days. The DCD shall make every attempt to resolve the complaint at the complaint at the earliest date. If the person aggrieved is still not satisfied, he or she may request that such complaint be submitted to the next higher level–the City Manager, and then the City Council, for resolution. Every effort shall be given to equitably resolve such complaint at every level. A log of all complaints and responses shall be kept.

A complaint can be filed at the following address:

Director of Community Development
City of Denison
300 West Main
P. O. Box 347
Denison, Texas 75021

XII. Adoption of the Citizen Participation Plan

The City of Denison will provide citizens with a reasonable opportunity to comment on the original citizen participation plan and on any amendments to the plan. The Citizen Participation Plan will be in a format accessible to persons with disabilities.