



Citizen Participation Plan for CDBG-DR Programs

Version 3.0

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Version History

Version	Date	Summary Description
1.0	06/13/2022	Approval of CDBG-DR CPP/LAP
2.0	01/27/2023	Revision to LAP data and language on “safe harbor” guidelines.
3.0	06/2025	Created the CPP as a stand alone document (made the LAP its own document) and made it applicable to 2020 and 2025 CDBG-DR allocations



State of Iowa Citizen Participation Plan for CDBG-DR

State of Iowa Citizen Participation Plan for CDBG-DR

Purpose

The State of Iowa developed this Citizen Participation Plan (CPP) to encourage all citizens impacted by disasters in Iowa, particularly low- and moderate-income citizens, to participate in the development of the State of Iowa's Community Development Block Grant-Disaster Recovery (CDBG-DR) Action Plan(s). CDBG-DR is a federal grant program that provides funding to cities, counties, and states to help them recover from federally declared disasters. The overall purpose of the CPP is to provide citizens with actionable opportunities and direction on how to participate in an advisory role in the planning, implementing, and assessing of Iowa's CDBG-DR funded programs.

The CPP was developed by the Iowa Economic Development Authority (IEDA) and incorporates all citizen participation requirements of 24 CFR Section 91.115, relevant Secretary's Waiver documented in pertinent Federal Register Notices relating to CDBG-DR allocations for Iowa, and subsequent relevant notices.

HUD requires CDBG-DR funds to be used to address unmet needs in the Most Impacted and Distressed (MID) areas resulting from qualifying disasters. IEDA is required to spend at least 80 percent of each CDBG-DR allocation, to benefit the HUD-identified MID areas. The table below lists the disasters covered by this CPP, the HUD MID areas, and any additional areas Iowa as identified as impacted and distressed areas (referred to as State MIDs). As needed, IEDA will add disaster events to the CPP to guide the planning and implementation of CDBG-DR funding.

Disaster Event	Congressional Appropriation Notice	HUD MIDs (80% of funds designated to these areas)	State MIDs (up to 20% of funds can be used in these areas)
2020 Iowa Severe Storms (Midwest Derecho) (DR-4557)	Federal Register Notice issued 2/3/2022 (87 FR 6364)	Linn	Marshall Benton Tama
2024 Iowa Severe Storms, Flooding, Straight-line Winds, and Tornadoes (DR-4796)	Federal Register Notice issued 1/16/20225 (FR-6512-N-01)	Cherokee County* Clay County Sioux County Woodbury County* *the entire county will be treated as the HUD MID area.	N/A – IEDA did not identify additional State MIDs.



Stakeholder Consultation During Plan Preparation

To ensure consistency of the CDBG-DR Action Plan with applicable regional redevelopment plans and other recovery initiatives, IEDA will consult with the following stakeholders:

- Indian tribes
- Local governments
- Federal partners
- Nongovernmental organizations
- Private sector
- Other affected parties in the surrounding geographic area
- Organizations that advocate on behalf of members of protected classes, vulnerable populations, and underserved communities impacted by the disaster
- Relevant government agencies including the state and local emergency management agencies that have primary responsibility for the administration of FEMA funds



CDBG-DR Action Plan and Opportunity for Public Comment

CDBG-DR Action Plan and Opportunity for Public Comment

Website

To notify the public of the CDBG-DR Action Plan's availability and the planned use of funds, IEDA will create a website for each federally declared disaster. The CDBG-DR Action Plan and Substantial Amendments to the Action Plan will be publically posted on the appropriate disaster website which is linked to the grantee's main website <https://www.iowaeda.com/disaster-recovery/>.

To ensure the public knows how all funds are used and administered, the grantee will also post all performance reports, the CPP, procurement policies, contracts that will be paid with CDBG-DR funds, and a description of goods or services currently being procured on the CDBG-DR website.

Disaster Event	Website
2020 Iowa Severe Storms (Midwest Derecho) (DR-4557)	https://www.iowaeda.com/disaster-recovery/cdbg-derecho/
2024 Iowa Severe Storms, Flooding, Straight-line Winds, and Tornadoes (DR-4796)	https://opportunityiowa.gov/community/disaster-recovery/2024-cdbg-dr-flood-recovery

Limited English Proficiency and Accessibility for CDBG-DR

To ensure Limited English Proficiency (LEP) individuals and persons with disabilities have access to the public hearings, IEDA will take the following actions:

- Include a statement in public hearing notices indicating that participants may request language interpretation to assist in their participation, via email or phone.
- Include a statement in notices of public hearings that the location of the meetings is accessible to a person with physical disabilities.
- Include a statement in public hearing notices that attendees can request reasonable accommodations from the grantee to participate in the public meetings.
- The grantee will make a reasonable effort to translate significant documents and include a "Google Translate" on the grantee's website to accommodate LEP communities.

Residents who require special accommodations to attend the hearing should contact the grantee by emailing Disaster@IowaEDA.com to make advance arrangements.

Comment Period

The State of Iowa makes every effort to publish the draft CDBG-DR Action 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.

The plan will remain available on the IEDA website, <https://www.iowaeda.com/disaster-recovery/>, throughout the comment period. Additionally, IEDA will post the draft CDBG-DR Action Plan or any substantial amendment **for at least 30 days** of public comment on the appropriate disaster website.

To notify the public of the plan's availability, public notification is provided via publication in local ads of the local newspaper, through promotion by applicable partners (i.e., council of governments), and social media. The public announcement explains that interested parties are given a reasonable opportunity to examine the contents of the plans and submit comments.

IEDA will also provide a copy of the plans to interested parties upon request.

Public Hearings

Per the Federal Register Notice's, at least one public hearing is required during the 30-day comment period for the Action Plan.

IEDA will convene at least one public hearing on the draft CDBG-DR Action Plan during the 30-day comment period. Notice of all hearings will be posted a *minimum of 10 business days* prior to public hearings.

All public hearings (whether in-person or virtual) will be held at a time and accessible location convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities or limited English proficiency (LEP). Both in-person and webinar-hosted hearings will be promoted through publication in local ads, through promotion by applicable partners (i.e., a council of governments), and on social media for at least 10 business days prior to the hearing.

Consideration of Comments

The grantee considers any comments or views of citizens and units of local government received either in writing or orally when preparing the final CDBG-DR Action Plan. The grantee will address the substance of any comments rather than only acknowledging receipt. A summary of those comments and the grantee's response will be attached to the final Action Plan

Substantial Amendment

Substantial amendments to the CDBG-DR Action Plan will require at least 30-days of public notice. The public notice will be made in the same manner as prescribed above. The thresholds for a Substantial Amendment to the Action Plan are as follows:

Action Plan – an amendment shall be considered substantial (requiring public notification and comment period) in the following events:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- A proposed change to an adopted method of distribution
- The allocation or reallocation is more than five million dollars or greater of a program budget

Substantial amendments do not require a public hearing.

Access to Records

Citizens, public agencies, and other interested parties are given reasonable and timely access to the information and records relating to the IEDA's CDBG-DR Action Plan and IEDA'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, IEDA has designated an appropriate and practicable procedure to handle complaints from citizens related to the CDBG-DR Action Plan, Substantial Amendments to the Action Plan, and performance reports. Upon receiving a complaint, IEDA will provide a timely, substantive written response within a 15-working day period.

Complaints should be sent in writing to:

Robert Wick, Disaster Recovery Team Lead
Iowa Economic Development Authority
1963 Bell Ave., Suite 200
Des Moines, IA 50315
robert.wick@iowaeda.com

Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov).

Complaints regarding accessibility can be reported to the IEDA's 504 Coordinator. Action Plan publication efforts must meet the effective communications requirements of 24 CFR 8.6 and other fair housing and civil rights requirements, such as the effective communication requirements under the Americans with Disabilities Act.

Grantee 504 Coordinator:

Joyce Brown, Housing Project Manager
Iowa Economic Development Authority
1963 Bell Avenue, Suite 200
Des Moines, IA 50315
Joyce.Brown@IowaEDA.com
515.348.6209



Requirements for Local Government Receiving CDBG-DR Funds

Requirements for Local Government Receiving CDBG-DR Funds

Citizen Participation for Units of Local Governments

Units of Local Governments (UGLGs) receiving CDBG-DR funds must comply with the State Citizen Participation Plan for CDBG-DR requirements. All applicants and recipients of grant/loan funds shall be required to conduct all aspects of the program openly 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 recipient's CDBG-DR project, except for confidential matters relating to housing and economic development programs, shall be open to examination by all citizens.

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 to enable them to be meaningfully involved in important decisions at the various stages of the program, including at least the determination of needs, the review of the proposed activities, and the review of past program performance

The Citizen Participation Plan includes citizen participation requirements for local governments receiving CDBG-DR funding that will ensure that citizens are provided with reasonable advance notice of, and the opportunity to comment on, proposed CDBG-DR applications to the State.

Local governments shall hold a minimum of two public hearings, including one hearing prior to submission of CDBG-DR applications to the state, which must respond to the disaster impacts and hazard risks identified in the CDBG-DR Action Plan. A second hearing is required to review program performance. To comply with the Citizen Participation requirements of 24 CFR 570.486 and Section 507 and 508 of the Housing and Community Development Act of 1987, CDBG-DR applicants are required to do the following:

Conduct at least one public hearing on the activities proposed in the application.

The hearing must include a review of the following:

- a. how the need for the activities was identified;
- b. how the proposed activities will be funded and the sources of funds;
- c. date the CDBG-DR application will be submitted;
- d. requested amount of federal funds;
- e. estimated portion of federal funds that will benefit low- and moderate-income persons;
- f. where the proposed activities will be conducted;
- g. plans to minimize displacement of persons and businesses resulting from funded activities;



- h. plans to assist persons displaced; and
- i. the nature of the proposed activities.

Conduct at least one public hearing on the status of funded activities. The hearing must include a review of the following:

- a. general description of accomplishments to date;
- b. summary of expenditures to date;
- c. general description of the remaining work; and
- d. general description of changes made to the project budget, performance targets, activity schedules, scope, location, objectives, or beneficiaries.

Publish hearing notices in a manner consistent with requirements of the Iowa Code, Section 362.3, and submit a copy of the public notice and minutes with the application.

Ensure the public's reasonable access to all local meetings, project records and information relating to the proposed and actual use of federal funds.

Conduct all related public meetings or hearings in public buildings or facilities that are accessible to persons with disabilities.

Provide citizens with names and addresses of the following:

- a. the person(s) authorized to receive and respond to citizen proposals, questions and complaints concerning;
- b. the person(s) available and able to provide technical assistance to groups representative of low-and moderate-income persons in preparing and presenting their proposals for the request and use of federal funds.

Provide translators during or written translations after public hearings attended by non-English speaking residents upon their request whenever they represent a significant proportion of the persons benefited by proposed or actual activities. A determination of what constitutes "...a significant proportion of the persons benefited by proposed or actual activities" shall be at the sole discretion of the IEDA Disaster Recovery Team Lead.

