

**City of Waterbury**  
**Citizen Participation Plan**  
**Amended April 2020**

**I. INTRODUCTION**

The City of Waterbury is a participating entitlement jurisdiction with the U.S. Department of Housing and Urban Development (HUD) for receipt of Community Development Block Grants (CDBG), Home Investment Partnership Program (HOME) funds, and Emergency Solutions Grant (ESG) funds. Citizens, public agencies, non-profits, and other interested parties are guaranteed a role in the development and review of all plans and performance reports. These plans include the Citizen Participation Plan (CPP) and any amendments to the CPP, the Consolidated Plan and any substantial amendments to the Consolidated Plan, the Assessment of Fair Housing (AFH) which is required with the Consolidated Plan, the Annual Action Plan, and the Consolidated Annual Performance and Evaluation Report (CAPER).

This document is the CPP required by 24 CFR § 91.105, Citizen Participation Plan for Local Governments. This CPP was developed through the coordinated efforts of the City of Waterbury and the citizens, public agencies, non-profits, and other interested parties in the City of Waterbury.

This CPP shall undergo a 15-day review and comment period after the date that it is available via newspaper advertisement in the Republican-American newspaper and news release. Copies of the CPP will be available at no cost at the Office of the City Clerk, and the main branch of the Silas Bronson Library (collectively, the “Distribution Points”<sup>1</sup>). Individuals with disabilities will be mailed a copy of the CPP at no cost by calling the Community Development Office at (203) 346-3810 ext 7288. The CPP will also be available online at the City of Waterbury’s web address ([www.waterburyct.org](http://www.waterburyct.org)) and in formats accessible to readers who are visually impaired. After the 15-day comment period, the CPP will be submitted to the Board of Aldermen at a public meeting. At this public meeting, the Board of Aldermen will review the CPP and any commentary received during the 15-day comment period. The Board of Aldermen will then vote on the Plan.

In the event that there is a need for amendment to the CPP, the amendment shall undergo the same publication and 15-day review and comment period described in the immediately preceding paragraph before being resubmitted for a vote of the Board of Aldermen.

---

<sup>1</sup>Distribution Points Addresses:

Office of the City Clerk, City of Waterbury, 235 Grand Street, Waterbury, CT 06702  
Silas Bronson Library, Main Branch, 267 Grand Street, Waterbury, CT 06702

## **II. CONTACT INFORMATION**

The City of Waterbury is a participating entitlement jurisdiction for receipt of federal funds from HUD. Since July 2017, the City has taken back the administration of these programs from the Waterbury Development Corporation. The programs are under the supervision of the Finance Director and administered by staff of the Community Development Office. Information about HUD programs administered by the Community Development Office can also be obtained at [www.cityofwaterburyct.org](http://www.cityofwaterburyct.org)

The Community Development Office has responsibility for administration of the Consolidated Plan process, which includes all activities related to development and dissemination of the CPP, the Consolidated Plans, the Assessment of Fair Housing Plans, the Annual Action Plans, and the Consolidated Annual Performance Evaluation Reports.

## **III. ENCOURAGEMENT OF CITIZEN PARTICIPATION**

This CPP has been adopted to encourage citizens of the City to participate in the development of the Consolidated Plan, the Assessment of Fair Housing Plan, the Annual Action Plan and any Substantial Amendments to the Consolidated or Annual Action Plans, as well as the required Consolidated Annual Performance Evaluation Reports. Participation is especially encouraged by low- and moderate- income persons and families, as well as those living in slum and blighted areas of Waterbury, residents of low- and moderate-income neighborhoods, and residents of areas where HUD funds are proposed to be used.<sup>2</sup> The CPP will also encourage the participation of all citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

In addition, the City will encourage the Waterbury Housing Authority (WHA) and its tenants to participate in the process of developing and implementing the Consolidated Plan and Annual Action Plan, the Assessment of Fair Housing Plan as well as the CAPER, along with other low- to moderate- income residents of potentially targeted revitalization areas. The City shall provide information to the WHA about development of the Consolidated Plan, Annual Plan, the Assessment of Fair Housing, CAPER, or any substantial

---

<sup>2</sup> Low-income families are defined by HUD as families whose incomes do not exceed 50 percent of the median family income for the area, as determined by HUD with adjustment for smaller and larger families. HUD may establish income ceilings higher or lower than 50 percent of the median for the area based on HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes

Moderate-income families are defined by HUD as those whose income is between 80 and 95 percent of the median family income for the area, as determined by HUD with adjustment for smaller and larger families. HUD may establish income ceilings higher or lower than 95 percent of the median for the area based on HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes

amendments to it so that the WHA can make this information available at its annual public hearing.

This CPP also provides for a Citizen Advisory Committee (CAC) in Section V that includes representatives of the stakeholders in the grant process, including those listed above. The CAC will conduct regular meetings, workshops, and public hearings, with notice advertised so as to encourage participation by all citizens, public agencies, non-profits, and other interested parties (see also public hearing notice requirements below in Section IV).

This CPP outlines opportunities for community participation in each stage of the development, funding, and evaluation process. The policies and procedures of this CPP relate to six specific stages of action in the development of the Consolidated Plan and the Annual Action Plans, although the City welcomes citizen interest and input throughout the year on community development and housing issues. These stages include:

1. The Information Sharing Stage: Information about participating in the grant allocation process and the development of the Consolidated Plan, the Assessment of Fair Housing Plan, the Annual Action Plan, or any substantial amendment thereof, is made available to the community.
2. The Needs Assessment Stage: The identification of housing and community development needs during the development of the Consolidated Plan and the Assessment of Fair Housing Plan.
3. The Plans Development Stage: The preparation, with participation and input from the public, of a draft Consolidated Plan, Assessment of Fair Housing Plan and Annual Action Plan, or any substantial amendment thereof.
4. The Approval Stage: The approval by the CAC and the Board of Aldermen of the Consolidated Plan, Assessment of Fair Housing Plan, Annual Action Plan, or any substantial amendment thereof.
5. The Amendment Stage: When a substantial change is made in the proposed use of funds or to the priorities established in an Annual Action Plan or the Consolidated Plan or the Assessment of Fair Housing Plan.
6. The Performance Review Stage: Review and preparation of the CAPER.

#### **IV. STAGES IN THE DEVELOPMENT OF CONSOLIDATED PLANS AND ANNUAL ACTION PLANS (COLLECTIVELY, "THE PLANS")**

The Consolidated Plan is a three, four, or five year plan submitted to HUD by the City that serves as the comprehensive housing affordability, strategy, and community development plan. In conjunction with the submission of the Consolidated Plan, the City must also submit its Assessment of Fair Housing Plan. The Consolidated Plan also includes submissions for funding under any of the Community Planning and Development formula

grant programs. The Annual Action Plan, developed every program year, outlines the planned activities that will be supported with Community Planning and Development formula grant programs.

A. The Information Sharing Stage

1. The first step in developing the Consolidated Plan and the Assessment of Fair Housing Plan shall be for the City to make available to citizens, public agencies, non-profits, and other interested parties the following:
  - Information that includes the amount of assistance the City expects to receive from HUD, including grant funds and program income.
  - The range of activities that may be undertaken.
  - The estimated amount that will benefit persons of low and moderate income.
  - Plans to (1) minimize the extent to which low and moderate income people will be displaced from their homes and (2) to assist any persons that will be displaced, specifying the types and levels of assistance the City will make available to assist displaced persons. (The City of Waterbury Relocation Plan.)

The City will inform the public that the above information is available by publishing notice of its availability in the Republican-American newspaper. The information will be available at no cost at Distribution Points. Individuals with disabilities will be mailed a copy of the CPP at no cost by calling the Community Development Office at (203) 346-3810. The information will also be available online at the City of Waterbury's web address ([www.waterburyct.org](http://www.waterburyct.org)) in formats accessible to readers who are visually impaired.

2. The first step in developing an Annual Action Plan will be for the CAC to solicit views of all citizens, agencies and other interested parties, particularly low- and moderate- income persons, so as to enable them to be meaningfully involved in important discussions at various stages of the Annual Plan process. The CAC will also solicit proposals for the use of funds.

At least 15 days prior to a public hearing, the City shall publish a notice in the Republican-American newspaper, and whenever feasible, in appropriate neighborhood and ethnic publications. Notice shall be available online at the City of Waterbury's web address ([www.waterburyct.org](http://www.waterburyct.org)) in formats accessible to readers who are visually impaired. Notice shall also be posted

in the City of Waterbury Office of the City Clerk. Notice of public hearings also shall be made available to the Waterbury Housing Authority and any other organization which may assist in the distributions of the notice into low/moderate income areas. The notice shall include the following information:

- The total amount of grant funds available to the City for all eligible activities.
- The range of activities that may be undertaken and the kind of activities previously funded in the City.
- The application process to be followed, along with application submission deadlines.
- The role of citizens in the program and process.
- A summary of other important program requirements.
- Date, time and place of public hearings.
- Place to obtain additional information and assistance.

The information in this notice may be included in the same notice published regarding the Consolidated Plan as described above.

3. Technical Assistance Workshops in developing proposals and informational CDBG Outreach Programs will be conducted during the Information Sharing Stage. In addition, these workshops and programs will be available to any group representative of low- and moderate- income persons that request such assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan or Annual Action Plans. Such assistance may be requested by calling the Community Development Office (203) 346-3810.
4. The City shall set a deadline for the submission of application for CDBG funds.

B. The Needs Assessment Stage

Because the housing and community development needs of low- and moderate-income persons are so great and so diverse, priorities must be set to decide which needs should get more attention and more resources than others. The City may partner with citizens, public agencies, non-profits and other interested parties to identify and assess these needs. To accomplish these goals, the City may utilize focus groups, needs assessment surveys, and input from neighborhood

organizations, social service agencies, nonprofits, and City department heads. This process will begin prior to the drafting of the Consolidated Plan, the Assessment of Fair Housing Plan and the Annual Action Plans.

To further these goals, at least two public hearings per year shall be held to obtain citizens' views and to respond to proposals and questions. The hearings will be conducted at a minimum of two different stages of the program year. At least one of these hearings will be held during the Needs Assessment Stage before the proposed Consolidated/Annual Action Plans are published for comment. The second public hearing will typically be held during the Plans Development Stage. The hearings must address housing and community development needs, development of proposed activities, and review of past program performance.

Notices for public hearings will be advertised by publication at least twice prior to the hearing date in the Republican-American newspaper, with the first notice being at least two weeks in advance of public hearings. Whenever feasible, ads and/or press releases on public hearings will be placed for publication in appropriate neighborhood and ethnic publications. Notices shall specify the purpose, date, time, and location of the hearing. Notices shall encourage any citizens, public agencies, non-profits, and other interested parties to attend and shall make clear that participation in the hearing is encouraged. Notices shall also specify that if non-English speaking, hearing-impaired, or disabled persons request assistance to participate in a public hearing, the City will provide appropriate assistance to the greatest extent possible if the Community Development Office is notified no later than four days in advance of the public hearing at 203-346-3810.

The public hearings shall be held in City Hall and at times that are convenient to interested parties and potential and actual beneficiaries, and that are handicapped accessible.

Upon receipt of the Annual Action Plan funding requests, the CAC will hold evaluation meetings to review, evaluate and draft the Plan in accordance with the priorities of the Five Year Plan. The CAC may invite applicants to attend if they have questions or may instruct the Community Development Office to contact them with specific information requests. Such meetings shall be noticed in accordance with the Connecticut Freedom of Information Act and shall be open to the public.

C. The Plans Development Stage – Public Comment and Participation

Upon conclusion of the first public hearing, the Needs Assessment Stage and the CAC evaluation meetings, the City will draft the proposed Consolidated Plan and Assessment of Fair Housing Plan (as required) and the Annual Action Plan. The City will publish a summary of the proposed Consolidated Plan or Annual Action Plan, as the case may be, in the Republican-American newspaper, and whenever feasible, in appropriate neighborhood and ethnic publications. In addition, copies of the proposed Consolidated Plan shall be available at no cost at the Distribution

Points. Individuals with disabilities will be mailed a copy of the proposed Plans at no cost by calling the Community Development Office at (203) 346-3810. The Plans will also be available online at the City of Waterbury's web address ([www.waterburyct.org](http://www.waterburyct.org)) and in formats accessible to readers who are visually impaired. The summary of the Plans will describe the contents and purpose of the Plans, and will contain a list of the locations where copies of the Plans may be examined. Publication of the proposed Plans will also advise that comments by citizens, public agencies, non-profits, and other interested parties are welcome, and the manner in which to submit comments. The summary of the proposed Annual Action Plans shall contain proposed funding allocations

Upon publication of the Plan(s), the City shall provide a period of at least 30 days for citizens, public agencies, non-profits and other interested parties to review the proposed Plan(s) and to submit comments. During the 30 day comment period, the City will hold the second public hearing. Notice for the second public hearing will be given in the same manner as the notice given for the first public hearing (see notice requirements under Needs Assessment section above). At the second public hearing, citizens, public agencies, non-profits, and any other interested parties will be given the opportunity to comment on the proposed Plan(s) either orally or in writing.

Throughout the 30 day comment period, the CAC shall consider any comments or views received in writing and/or orally on the Plans. The CAC will then, at its next meeting, make recommendations on the funding allocations for the Annual Action Plans and on the public comments received for both plans. A summary of all public comments received, including those not accepted and the reasons therefore, shall be appended to the final Plan(s) prior to submission to the Board of Aldermen.

D. The Approval Stage

After recommendation is given by the CAC, it shall recommend approval to the Board of Aldermen. The Plans are due at HUD no less than 45 days before the start of the City's program year.

E. The Amendment Stage

Amendments to the Consolidated/Annual Action Plans include:

- Changes in the goal, priority or activity of the Plans;
- Carrying out an activity using funds from any program covered by the Consolidated Plans (including program income) but that was not included in the Annual Action Plan;
- Changes to the purpose, scope, location, or beneficiaries of an activity included in the Annual Action Plan;

Substantial Amendments to the Consolidated/Annual Action Plans include:

- A change in the use of grant funds from one eligible activity to another;
- The elimination of an activity originally described in the Annual Action Plan;
- The addition of an activity not originally described in the Annual Action Plan;
- Changes to the term of either a Consolidated Plan or Annual Action Plan;
- Major reprogramming of funds (a reprogramming of funds of more than 5% of the grant allocation or \$100,000 whichever is greater);

Substantial amendments shall be presented to the CAC described in Section V, for its review and approval. The CAC will hold a public hearing on the proposed substantial amendment following public notice of the amendment and a public review/comment period. The notice shall contain a summary of the proposed substantial amendment, notice of the date, time, location, and accommodation options of the public hearing, and provide for a 30 day public review/comment period. Such notice shall be published in the Republican-American newspaper, and whenever feasible, in appropriate neighborhood and ethnic publications. The proposed substantial amendment shall be available online at the City of Waterbury's web address ([www.waterburyct.org](http://www.waterburyct.org)) in formats accessible to readers who are visually impaired. Copies of the proposed amendments shall be available to the public at no cost at the Distribution Points. Persons with disabilities may be mailed a copy of the proposed amendments at no cost by calling the Community Development Office at (203) 346-3810.

Following the public hearing and the close of the commentary period, due consideration will be given to all comments and views expressed by the public either in writing or orally at a public hearing. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the substantial amendment of the Plan. After recommendation is given by the CAC, it shall recommend approval to the Board of Aldermen. Upon approval by the Board of Aldermen, the approved amendment will be forwarded to HUD in accordance with 24 C.F.R. § 91.505.

F. Performance Review Stage - Consolidated Annual Performance and Evaluation Report

The Consolidated Annual Performance and Evaluation Report (CAPER) must be submitted to HUD within 90 days of the close of the City's program year. The

purpose of the CAPER is to provide HUD with necessary information to assess the City's ability to carry out its programs in compliance with applicable regulations and requirements; provide information necessary for HUD to report to Congress; and, provide the City with an opportunity to describe its program achievements.

A notice of the availability of the draft CAPER shall be published in the Republican-American newspaper, and whenever feasible, in appropriate neighborhood and ethnic publications, as well as on City of Waterbury's web address ([www.waterburyct.org](http://www.waterburyct.org)) not later than 15 days prior to the due date of the CAPER or, should the CAPER be submitted prior to its due date, not later than 15 days prior to its submission to HUD. Hardcopies of the CAPER will be available at no cost at Distribution Points. Individuals with disabilities will be mailed a copy of the CAPER at no cost by calling the Community Development Office at (203) 346-3810.

From the date of the availability of the draft CAPER, interested parties shall have a 15 day period for review and to deliver comments on the CAPER to the City. The City shall consider any comments or views of citizens, agencies and/or groups received in writing and/or orally in preparation of the final CAPER. A summary of comments and views received and a summary of comments and views not accepted and the reasons therefore, shall also be attached to the final CAPER as submitted to HUD.

## **V. CITIZEN ADVISORY COMMITTEE**

### **A. Purposes and Roles of the Citizen Advisory Committee**

The purposes and objectives of the CAC is to administer the citizen participation requirements of the Housing and Community Development Act of 1974, as amended, and Public Act No. 75-44, as amended and to recommend for approval the grant applications for CDBG, ESG and HOME funds and other formula grant programs from HUD which the City may be come eligible for including funds from the Recovery Act of 2009 and subsequent funding if any.

#### **1. Administration of the CPP**

The CAC shall administer the participation of citizens, public agencies, non-profits, and other interested parties, including minorities, low/moderate income persons, non-English speaking persons, and persons with disabilities, in the development and approval of the following:

- The Consolidated Plan, including the identification of community development and housing needs and the setting of priorities, objectives and goals.

- The Assessment of Fair Housing Plan, that will affirmatively further fair housing by setting forth strategies and actions consistent with the goals identified.
- Annual Action Plan of projects that are consistent with the Consolidated Plan.
- The annual CDBG Program and CDBG budget, including the application process, criteria and procedures, policy and methods of implementing CDBG projects and the monitoring of progress of all funded programs.
- Subsequent minor amendments and other significant changes/amendments to previously approved programs in the Consolidated Plan.
- Development of the CAPER and the soliciting of views regarding the effectiveness of various CDBG projects.
- Public outreach and public education as to the Consolidated/Annual planning process.

2. Approval and Recommendation

The CAC will also prepare and recommend grant applications for CDBG funding to the Board of Aldermen, monitor the progress of funded programs, and make recommendations to the Board of Aldermen regarding the implementation of CDBG funded programs.

B. Structure of the CAC

1. A community-based CAC shall be appointed by the Mayor of the City of Waterbury. The CAC shall consist of nine (9) members, the majority whom shall live in, own businesses in, work in, or represent the interests of low- or moderate- income citizens in the City.
2. Membership to the CAC shall represent the following interest groups:
  - Mayor of the City of Waterbury or the Mayor's designee (1)
  - Board of Aldermen (2)
  - Waterbury Housing Authority (1)
  - Continuum of Care (CoC) or non-profit housing services organization (1)
  - Social Service representatives (1)
  - Low/Moderate income neighborhood residents representing a wide variety of neighborhoods from eligible census tracts, including

neighborhoods or census tracts that may be targeted for funds under the Consolidated Plan (3)

3. Terms

The terms of the Mayor or the Mayor's designee and the Board of Aldermen members shall run concurrently with the term of their office. The term of the remaining 6 shall be as follows: two shall serve for four years, two shall serve for three years, and two shall serve for two years. Thereafter, members shall be appointed annually to serve for four years. Each member shall serve until his successor has been appointed and qualifies. The mayor shall fill a vacancy for the remainder of the term.

4. Non-attendance by Committee Members

In the event that any CAC member misses three consecutive meetings and upon the recommendation of the CAC, the Mayor may remove that member and fill the vacancy. Generally, if any such member represents a group of stakeholders, a person representing the same group of stakeholders shall replace him. Voluntary resignations shall be handled in a similar manner.

C. Organization of the CAC

1. The Committee shall select a Chairman, Vice-Chairman, Secretary, and such other officers as may be necessary (CAC officers). An annual organizational meeting for the purpose of electing officers shall be conducted each October.
2. Upon creation of the CAC, an initial temporary Chairman shall be appointed by the Mayor. The initial temporary Chairman shall be empowered to conduct a meeting to oversee the election of a permanent Chairman and to appoint a temporary Secretary, who shall only be empowered as temporary Secretary until a permanent Secretary is elected. Once the permanent Chairman is elected, the permanent Chairman shall continue the meeting and the next order of business shall be to adopt CAC By-Laws. Immediately following adoption of the CAC By-Laws, the permanent Chairman shall oversee election of the remaining permanent CAC Officers.
3. Regular meetings of the CAC shall be at least quarterly. Meetings shall be conducted in accordance with Robert's Rules of Order, the version of which shall be established in the CAC By-Laws. Meetings will be held through the year to provide public outreach to all citizens, public agencies, non-profits, and other interested parties to learn about the Consolidated/Annual Plan process and to participate in the development of each. Meetings shall also be held as for the purpose of developing the Consolidated Plan, the Assessment of Fair Housing Plan, Annual Action Plan, CAPER, and any

substantial amendments to the plans. Dates, times and locations of CAC meetings shall be posted with the City Clerk's Office in a manner consistent with the Connecticut Freedom of Information Act, as amended. Non-English and hearing-impaired citizens may request assistance at CAC meetings and/or public hearings by calling the Community Development Office at (203) 346-3810 no less than four days in advance of the meeting or hearing.

## **VI. PUBLIC ACCESS TO INFORMATION AND RECORDS**

The City of Waterbury will provide the public with reasonable and timely access to information and records relating to the data or content of the Consolidated Plan, the Assessment of Fair Housing Plan, Annual Action Plans, and CAPER, as well as the proposed, actual, and past use of funds provided by HUD for the grant programs covered by this CPP for the preceding five years. The public will also have access to minutes of all public hearings or meetings, and relevant documents relating to federal, state and local procedures and policies.

## **VII. COMPLAINTS**

- A. Complaints may be submitted orally or in writing to the CAC or the City for consideration at any time during the program year. This includes but is not limited to complaints, recommendations, and requests related to the Consolidated Plan, the Assessment of Fair Housing Plan, Annual Action Plan, Substantial Amendments and the CAPER. Written comments should be submitted to: The Community Development Office, City Hall, Room C-29, 235 Grand Street, Waterbury, CT 06702, Attn: Housing and Community Planning Program Director.

Complaints may also be submitted orally at either public hearings or meetings called by the CAC, or by scheduling a meeting with a staff member of the Community Development Office. A formal complaint will then be transcribed. The complainant must sign the letter and provide an address to which a written response can be directed.

- B. Written responses shall be made to complaints within 15 working days, where practicable, after a determination by the CAC at its special meeting or regular meeting date. When appropriate, written responses to complaints may be provided by the Community Development Office. When it is not practicable to respond within 15 days, a letter explaining the reason why a response within 15 days is not practicable, as well as an estimate for when a response will be given within a reasonable period of time, shall be sent to the complainant.
- C. All written responses to written recommendations, requests and/or objections shall state reasons for action taken or, in the case of staff response, shall make specific reference to pertinent sections of CDBG legislation.

## **VIII. AMENDING THE CITIZEN PARTICIPATION PLAN**

This CPP can be modified by the same publication and 15-day review and comment period described in the Introduction of this CPP.

## **IX. IN THE EVENT OF AN EMERGENCY EXPEDITED PROCEDURES**

In the event of a local, state or federally declared disaster or emergency where public places may be closed to the public or in-person participation may not be feasible or large gatherings may be considered a public health risk, the City may opt to conduct public hearings and meetings virtually via conference call or live web-streaming with the ability to ask questions and provide comment in real time. Accommodations will be made for persons with disabilities and non-English speaking persons upon request, such as sign language or language interpretation services. Documents for public review will be shared via the City's website: [www.waterburyct.org](http://www.waterburyct.org). Copies of the documents may be mailed if access is available to the Community Development Office or will be emailed upon request.

The City may schedule its two required public hearings at times that can be accommodated during an emergency. This may include scheduling both public hearings prior to the approval of the Consolidated Plan, or one during the development of the Consolidated Plan and one before the submission of the City's CAPER for the same program year.

The Coronavirus Aid, Relief and Economic Security Act (CARES Act) PL 116-136 signed on March 27, 2020 provides funds under the Community Development Block Grant Program (CBDG-CV) and Emergency Solutions Grant Program (ESG-CV) to the City of Waterbury. These funds are to be used to prevent, prepare for and respond to the Coronavirus (COVID-19) pandemic. HUD has provided that communities may need waivers from them in order to meet the challenges which the situation presents with regard to the normal course of business. The City will decide whether any of the waivers are necessary for it to continue meeting its regulatory requirements for the CDBG, ESG and HOME Programs and will submit them accordingly.

In order to receive the CARES Act funds, the City must prepare and submit a Substantial Amendment. A notice of funding availability will be published, an abbreviated application will be required to be submitted, a plan will be developed for the use of the funds and published for a 5-day public comment period. The normal 30-day public comment period has been reduced to 5-days. The CAC will hold a public hearing on the Substantial Amendment. The Substantial Amendment will be recommended to the Board of Aldermen for approval. The approved Substantial Amendment will be forwarded to HUD.