

**STATE OF IOWA'S
CITIZEN PARTICIPATION PLAN
RELATING CDBG-NDR PROGRAM**

Pursuant to the citizen participation requirements of 24 CFR Section 91.115 and further guidance in the Notice of national Disaster Resilience Competition Grant Requirements, the State of Iowa's Economic Development Authority (IEDA), set forth the following Citizen Participation Plan as it relates to the CDBG-NDR Program for resiliency programs funded by the Department of Housing and Urban Development (HUD). The Citizen Participation Plan presents the State's plan for amending the CDBG-NDR Action Plan and providing and encouraging all citizens to comment on the CDBG-NDR program.

Encouragement of Citizen Participation

The State of Iowa provides for and encourages citizens to review the CDBG-NDR Program in the following ways:

1. IEDA maintains an up to date webpage with the most recent Action Plan and Quarterly Performance Report, CDBG NDR applications, Citizen Participation Plan, NDR policy and Procedures, non-substantial and substantial amendments, and contracts procured:
<https://www.iowaeconomicdevelopment.com/Community/NDR>
2. Participation was solicited for both phases of the CDBG-NDR application process. A public hearing was held for Phase 1 and Phase II of the application. In addition, public comment was solicited during a 15-day comment period for Phase 1 and a 30-day comment period for Phase II.
3. Extensive public and partner outreach and consultation occurred during the application process. Attachment D in the Phase 2 application available on the Disaster Resilience Grant: Iowa Watershed Approach webpage lists the participants in this process.
4. For substantial amendments, IEDA will allow a 15-day period prior to submitting to HUD

IEDA encourages all citizens have equal access to information about the programs, including persons with disabilities and limited English proficiency (LEP).

Amendments

The CDBG-NDR action plan is available on the website noted above. The Action Plan details the grant, activity status, and metrics used to measure grant accomplishments. The public can further learn about the grant through the website or by contacting IEDA directly.

There is a procedure to amending the CDBG-NDR Action Plan. There are two types of amendments:

Substantial Amendment: The following criteria will determine what changes to planned or actual activities constitute a substantial amendment to the CDBG-NDR Action Plan:

1. Any change to the Most Impacted and Distressed target area(s) (a revised area must meet Most Impacted and Distressed threshold requirements in the NOFA, including Appendix G to the NOFA)
2. Any change in program benefit, beneficiaries, or eligibility criteria, the allocation or reallocation of more than \$1 million, or the addition or deletion of an eligible activity.

Non-substantial amendment: Any change that does not meet the threshold of a substantial amendment. Such as amending Action Plans solely to accommodate changes to the timeline for projected expenditures.

Substantial Amendment Review and Public Comment

Citizen participation is required prior to submitting a substantial amendment to HUD for their review. The following procedure will be followed:

- i. The draft Substantial Amendment to the Action Plan shall be made available for public review for a 15-day period prior to submitting to HUD. The State will publish a newspaper and web site summary describing the Substantial Amendment contents and purpose, and listing the locations where the entire Substantial Amendment may be examined. The Substantial Amendment shall be provided in a format accessible to persons with disabilities and limited English proficiency (LEP) upon request.
- ii. The State will consider any comments of citizens and local governments received. A summary of any comments or views, not accepted and the reasons for not accepting the comments/views shall be attached to the Substantial Amendment.

Submittal to HUD of substantial and non-substantial amendment

The proposed amendment (both substantial and non-substantial) will include a section that identifies exactly what content is being added, deleted, or changed. There will be a section that includes a chart or table that clearly illustrates where funds are coming from and to where they are moving. The amendment will also include a revised budget allocation table that reflects the entirety of all funds, as amended. The amendments will be numbered sequentially and posted on the Web site.

HUD will acknowledge receipt of the proposed amendment via email or letter within 5 business days of receipt. HUD may seek additional information to determine whether a proposed amendment is a substantial amendment.

Comments and Complaints

1. Comments

Written and verbal comments received at public hearings or during the comment period, will be considered and summarized, and included as an attachment to the State's substantially amended Action Plan. Written comments should be addressed to:

Ann Schmid, Disaster Recovery Team Leader
Iowa Economic Development Authority (IEDA)
200 East Grand Avenue
Des Moines, IA 50309

Phone: (515) 348-6202
Email: Ann.Schmid@iowaeda.com

A written response will be made to all written comments within ten working days when practicable, acknowledging the letter and identifying a plan of action, if necessary. Every effort will be made to send a complete response within 15 working days to those who submit written proposals or comments.

2. Complaints

A complaint regarding the CDBG-NDR program must be submitted in writing to the IEDA contact person in writing. A written response will be made to written complaints within 15 working days, acknowledging the letter and identifying a plan of action, if necessary.

The State will accept written complaints provided they specify:

- The description of the objection, and supporting facts and data; and
- Provide name, address, telephone number, and a date of complaint.

All written complaints shall be submitted to:

Ann Schmid, Disaster Recovery Team Leader
Iowa Economic Development Authority (IEDA)
200 East Grand Avenue
Des Moines, IA 50309

Phone: (515) 348-6202
Email: Ann.Schmid@iowaeda.com

The written complaint will be considered by the Community Development Division Administrator and addressed in writing to the person who has written the complaint.