



**Citizen Participation Plan
&
Four-Factor Analysis and Language Access Plan (LAP)
for Limited English Proficiency Persons**

City of Jacksonville, Florida

Neighborhoods Department
Housing and Community Development Division

Adopted January 2019

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Introduction

Each year, the City of Jacksonville receives funding through the US Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) grant programs.

As a requirement for receiving these funds, the City must complete several planning and reporting reports to be submitted to HUD for approval. These reports include:

- 1) Five Year Consolidated Plan (ConPlan);
- 2) Analysis of Impediments to Fair Housing Choice (AI);
- 3) Annual Action Plan (AAP);
- 4) Consolidated Annual Performance Evaluation Report (CAPER);
- 5) Citizen Participation Plan; and
- 6) A Substantial Amendment to any of the above plans or reports (as defined below)

Citizen Participation must be an integral part of the planning process for the Consolidated Submission for all Community Planning and Development Programs (CPD). Much of the citizen participation process involves scheduling, publicizing and conducting public meetings and hearings. HUD, in its attempt to ensure adequate opportunity for participation by program beneficiaries, has prescribed minimum Citizen Participation, plan submission, performance reporting, and record maintenance requirements. These Citizen Participation Requirements are established in 24 Code of Federal Regulations (CFR) Part 91.105.

The CDBG, HOME, ESG and HOPWA programs are administered by the Neighborhoods Department, Housing and Community Development Division (HCDD) of the City of Jacksonville. The local citizen participation process generally includes a yearly series of well-advertised community/neighborhood public meetings held at city hall, to review the Annual Action Plan and the Consolidated Annual Performance Evaluation Report as well as any amendments or changes to the Consolidated Plan. All meetings and public hearings are advertised in accordance with applicable HUD, State and local regulations. Public notices for environmental procedures and project related purposes are also part of the citizen participation process.

Public Notice

To encourage low- and moderate-income persons to attend and participate, the annual community public meetings and public hearings are held in the early evening, Monday through Thursday at various public venues throughout the City. HCDD staff also tries to avoid scheduling meetings on nights common with other major events which may require the participation of affected area residents and community leaders. Public hearings are typically conducted at HCDD, located at the Ed Ball Building, 214 North Hogan Street however, public meetings (and in some instances public hearings) may also be held in public venues throughout the community like public libraries and community centers.

All public hearings shall be announced at least ten (10) calendar days before the date of the meeting. The HCDD will utilize the following media to notify program beneficiaries regarding upcoming meetings.

- A. Newspaper advertisements, of no smaller than eight (8) point size, are published in adjudicated newspapers of general circulation serving the City in both English and Spanish. Each publication is published at least ten (10) calendar days before the date of the public hearing.
- B. Public Hearings are always advertised on the City of Jacksonville's website.

Public Hearings & Public Meetings

At least two public hearings must be held each year. One of which must be held as part of the Consolidated Plan and/or Annual Action Plan and a second public hearing must be held to provide information related to the CAPER which details the City's performance towards meeting annual goals and objectives for the CDBG, HOME, ESG and HOPWA programs. Additional public meetings may be held at the discretion of City staff.

The public hearings will serve several purposes:

- 1) inform potential recipients of the functions of the HCDD department and its relationship to both Jacksonville's City Council and HUD;
- 2) explain the rules and regulations governing the CDBG, HOME, ESG and HOPWA program;
- 3) explain how the program relates to the needs of individuals/neighborhoods/non-profit organizations, etc.;
- 4) provide information regarding the amount of CDBG/HOME/ESG/HOPWA funds expected to become available;
- 5) explain the types of eligible activities;
- 6) discuss the status of previously funded activities;
- 7) determine citizen's perceived housing and non-housing community development needs and possible activities to address those needs;
- 8) review of performance and compliance issues;
- 9) detail the City's plan to minimize displacement;
- 10) and receive comments, input and feedback related to each plan and/or report.

Publication of Plans & Reports

The City of Jacksonville, Neighborhoods Department, Housing and Community Development Division will publish, and make available to the public, the following plans and reports:

- 1) Five Year Consolidated Plan
- 2) Analysis of Impediments to Fair Housing Choice (AI)
- 3) Annual Action Plan
- 4) Consolidated Annual Performance Evaluation Report (CAPER)
- 5) Citizen Participation Plan (CPP)
- 6) A Substantial Amendment to any of the above plans or reports (as defined below)

The publication is made to afford citizens an opportunity to examine the documents' contents, and to provide further opportunity for comments (written and orally) and citizen feedback regarding the proposed document. A brief summary of each plan and/or report is to be published in newspapers of general circulation in both English and Spanish.

Additionally, all plans and reports, listed above, shall be made available, in their entirety, for further review in the following manner: 1) a PDF copy available on the City's website 2) hard copies available for review at the City offices and 3) hard copies available at the Jacksonville Public Library branches. Furthermore, copies of the proposed plan and/or report will be made available, free of charge, for individuals who request them.

A period of no less than thirty (30) days shall be made available for public review and comment for the Consolidated Plan, Annual Action Plan, and the Citizen Participation Plan. The City shall make the Consolidated Annual Performance and Evaluation Report and any Substantial Amendments to these Plans available for public comment for a minimum of fifteen (15) calendar days prior to finalization by City staff. The Analysis of Impediments to Fair Housing Choice does not require a public comment period.

Amendments to Plans & Reports

In the event the City needs to make changes to the Consolidated Plan and the Annual Action Plan, the City must determine the nature of the required changes and in such cases where the changes are considered substantial, the City must produce what HUD refers to as a Substantial Amendment to the Consolidated Plan and/or Annual Action Plan.

The Substantial Amendment process will occur when the following program changes exist:

To the Consolidated Plan:

- 1) there is a change to the Priority Needs identified in the Strategic Plan;
- 2) there is a change to the Goals and Objectives identified in the Strategic Plan;
- 3) there is a change to the Target Geographies/Areas identified in the Strategic Plan; and
- 4) new entitlement grants are awarded to the City.

To the Annual Action Plan:

- 1) there is a change to the Annual Goals and Objectives identified in the Action Plan;
- 2) there is a change to the Target Geographies/Areas identified in the Action Plan
- 3) when a Project previously described in the Action Plan is canceled;
- 4) creation of a new Project not previously described in the Action Plan;
- 5) the funding allocated to an existing Project is adjusted by whichever is lesser: 20%, or more, or \$200,000 of the initial funding amount; and
- 6) revision to an existing project which changes the purpose, scope, location, or beneficiaries of the program.

All other changes will be considered revisions (non-substantial) and will be accomplished administratively by HCDD.

Prior to amending a Consolidated Plan and/or Annual Action Plan, the City will provide citizens with reasonable notice of, and opportunity to comment on, proposed program changes in its use of Action Plan funds for a project (either funded in whole or in part). This involves a 15-day review period. A summary of citizen comments or views and the reasons any such comments or views were not accepted will be attached to amendments of the Plan. The City will consider any such comments, and if the grantee deems appropriate, modify the changes.

Citizen Comments & Feedback

During all public meetings and hearings citizens are encouraged to comment or submit written comments/complaints to the City of Jacksonville, Neighborhoods Department, Housing and Community Development Division concerning the proposed plans, reports and the performance of the HCDD department and/or other City departments and entities under contract with the City for the implementation of program related activities. All comments, written and oral, will be accepted and included as part of the citizen participation records for the associated plan and/or report.

Citizens may also provide written and oral comments at public hearings and written feedback via mail addressed to the following:

City of Jacksonville,
Neighborhoods Department
Housing and Community Development Division
Attention: Stephanie Burch
Director of Neighborhoods
214 N. Hogan St. Suite 700
Jacksonville, FL 32202

The Director of Neighborhoods may also be reached by telephone for oral comments and email comments at HCDDcomments@coj.net or by calling (904) 255-8200.

When responses are warranted, written comments/complaints regarding any facet of the CDBG, HOME, ESG or HOPWA program or its implementation in Jacksonville are answered in writing. Unless specific circumstances exist, which prevent immediate action, written replies are mailed within fifteen (15) working days, where practical, after receipt of the written comment/complaint (or oral comment/complaint if made during a public meeting/hearing).

Accessibility of Meetings & Documents

Bilingual Information

With at least one business day of advanced notice Spanish translators will be provided at public meetings. Translation services will also be provided for persons who may need assistance reviewing printed documents, reports and/or other related materials. Citizens may contact the HCDD office at (904) 255-8200 at least 24 hours in advance to request such services.

American With Disabilities Act (ADA) - 1973 Rehabilitation Act

With at least one business day of advanced notice, the department shall provide assistance and special arrangements for those who are disabled in order to provide information and services concerning federally funded programs. All city CDBG, HOME, ESG and HOPWA program related plans will be placed in the Jacksonville Public Libraries. Each library has reader magnification machines to aid the visually handicapped to read HCDD records. Proposed plans are placed on the HCDD department's website at <http://www.coj.net/departments/neighborhoods/housing-and-community-development>.

All visual aids used in the city council chambers are displayed on large screens to help all sighted people to see them better. All public meetings are held in buildings which are accessible to the handicapped. Citizens may contact the HCDD Office at (904) 255-8200 at least 24 hours in advance to request such services.

Additional Citizen Participation Activities

Consultation of Area Agencies

Under 24 CFR.91.100 (a)(1) as part of the Consolidated Plan process, the City shall consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. The City shall also consult with community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws when preparing the Consolidated Plan including participants in Fair Housing organizations, nonprofit organizations that receive funding under the Fair Housing Initiative Program and other public and private fair housing service agencies, to the extent that such entities operate within the jurisdiction. Additionally, the consultation process will include consultation with regional government agencies in addition to adjacent units of general local government and local government agencies. This includes local government agencies with metropolitan-wide planning and transportation responsibilities, partially for problems and solutions that go beyond the City's jurisdiction.

Under 24 CFR.91.100 (c)(1) as part of the Consolidated Plan development process, the City shall also consult with public housing authorities (PHAs) operating within the jurisdiction. This consultation will continue to consider public housing needs, planned programs and activities under the Consolidated Plan as well as strategies for affirmatively furthering fair housing specifically to address any fair housing issues in the public housing and Housing Choice Voucher programs. The consultation process requires the City to address the needs of public housing and, where necessary, the manner in which it will provide financial or other assistance to a troubled PHA to improve the PHA's operations and remove the designation of troubled.

Public Access to Records

The HCDD maintains copies of all plans, reports and amendments for each program year in the department office. Additionally, the HCDD maintains a library of rules, regulations, and records required by HUD and the City of Jacksonville. This library of records includes records related not only to the plans and reports but also all programmatic documents, meeting notes, written and oral comments received, environmental reviews, office publications, etc., produced since the inception of the CDBG, HOME, ESG and HOPWA program in Jacksonville. This information is available for public review and copying during normal business hours, provided that the requested document is public information pursuant to applicable federal, state, and local laws.

Public Access to Data Sources

As part of the Consolidated Plan and the Analysis of Impediments to Fair Housing Choice, the City will utilize HUD provided data sets and mapping tools. When applicable, the City will reference these data sets in plans and reports as well as provide a link to such data sources within the draft documents. This shall provide citizens and community stakeholders the opportunity to review the data utilized to set priority needs, goals and objectives.

Residents of Public and Assisted Housing

Residents of public and assisted housing are stake holders with HUD in that they receive rental assistance from HUD. These residents are therefore encouraged to participate in the planning and execution of the CDBG, HOME, ESG and HOPWA programs, because they are also eligible to benefit from the expenditure of HUD federal funds.

Environmental Review

In certain instances, the participation consists of publication of specific actions/findings, including a description of the project, its locations, submission of relevant data to applicable local, state and federal agencies for review and comment, and the Director of Neighborhood's approval of federal environmental findings relating to the Request for Release of funds from HUD.

Miscellaneous and Informal Meetings

HCDD staff attends and/or conducts miscellaneous meetings and hearings throughout the program year. While many of these meetings are project specific, many others are held at the request of individuals, groups, other City departments or City Council members for the purpose of disseminating or receiving information about the CDBG, HOME, ESG and HOPWA program in general, or about issues of specific interest. These meetings generally are not advertised, since the meeting is attended by the parties requesting the meeting, HCDD staff and various other invited participants.

The HCDD department maintains an Initial Contact/Proposed Project file and Citizen Comment/Complaint file. These mechanisms allow HCDD to record correspondence with individuals and/or organizations that submit proposals or make comments or requests of the department during the program year. Requests, proposals and questions received during the program year are researched and discussed during applicable local public meetings and during the planning of subsequent programs. This information is on file in the HCDD department office and is processed at a time appropriate to the nature of the specific contact.

Technical Assistance

Pursuant to the Housing and Community Development Act of 1974 (as amended) and its implementing federal regulations, the City's Neighborhoods Department, Housing and Community Development Division shall provide technical assistance when requested by public and private agencies, non-profit public benefit organizations and individuals for the purpose of assisting the agency or individual in developing its proposal for consideration of Consolidated Plan funding, provided the proposal is eligible and qualifies per HUD regulations. Technical assistance shall include but not be limited to:

- A. Assisting in better defining the proposal by outlining specific information the applicant(s) should gather and include in their proposal.

- B. Referring applicant to other public and private agencies which may help gather or provide needed information and/or technical assistance.
- C. Developing preliminary cost estimates for the proposal.
- D. Preparing very basic conceptual descriptions and/or drawing of the proposal.
- E. Providing for final review of the proposal for completeness prior to its official submission to the HCDD for consideration for funding.

In addition to the technical assistance for development of proposals, the HCDD will continue providing assistance for implementation; and administration and monitoring of CDBG, HOME, ESG and HOPWA funded projects. This assistance includes such things as:

- A. Obtaining environmental clearance for projects.
- B. In certain instances (depending on staff work load), implementing activities on behalf of the subrecipient.
- C. Providing guidance in the solicitation and contracting process for hiring a consultant to insure compliance with applicable local, state and federal regulations.
- D. Assisting in reviewing and monitoring consultant's work.
- E. Providing guidance in bid advertisement for construction to insure compliance with all applicable requirements.
- F. Assisting in monitoring contractors and subcontractors during and after construction for compliance with HUD regulations.
- G. Acting as mediator in disputes between subrecipient and contractor.
- H. Providing CDBG, HOME, ESG and HOPWA application workshops for non-profit organizations.

Plans to Minimize Displacement of Persons and to Assist any Persons Displaced

The City of Jacksonville in accordance with the Uniform relocation Assistance and real Property Acquisition Policies Act of 1970, the 1988 Common Rule, and the 1989 Barney Frank Act, will provide relocation assistance, as describe in 24 CFR 570.606(b)(2), to each low/moderate-income household displaced by the demolition of housing or by the conversion of a low/moderate-income dwelling to another use as a direct result of assisted activities.

Consistent with the goals and objectives of activities assisted under the Act, the City of Jacksonville will include, but not be limited to, the following steps to minimize the displacement of persons from their homes:

1. Avoid, as much as possible, Action Plan funded projects which permanently displace persons from their homes.
2. Fully advise any residents who may be displaced of their rights and options for relocation benefits as required by federal regulations.
3. Assist displaced residents in filling out any required forms for assistance or to appeal City decisions regarding displacement or the level of relocation benefits.

Complaints

Citizens wishing to submit a complaint regarding any portion of the citizen participation process and/or development of the CDBG, HOME, ESG and HOPWA application, Consolidated Plan, Performance Report or amendment to the Consolidated Plan, may do so according to the following procedure:

1. Formal complaints should be submitted in writing to:

City of Jacksonville,
Housing and Community Development Division
Attention: Division Chief
214 N. Hogan St. Suite 700
Jacksonville, FL 32202

The Division Chief will refer the complaint to the appropriate city staff member for written response regarding the complaint. The written response will be mailed within fifteen business days of the receipt of the complaint.

2. If the complainant is not satisfied with HCDD's response, the complainant can appeal the decision to the Director of Neighborhoods. The Director will have thirty business days to take further action as deemed necessary to address the complainant's concerns.

3. If complainants are not satisfied with the decision of the Director of Neighborhoods, a written complaint may be submitted to the HUD Regional Office at:

Tom Bilodeau, Program Manager
U.S. Department of Housing and Urban Development
Jacksonville Office, Region IV
400 West Bay Street, Suite 1015
Jacksonville, Florida 32202-1512

Four-Factor Analysis and Language Access Plan (LAP) for Limited English Proficiency Persons

HUD Entitlement Programs: CDBG, HOME, ESG & HOPWA

Purpose: In compliance with Executive Order 13166, the City of Jacksonville has developed the following Four-Factor Analysis and Language Action Plan (LAP) for Limited English Proficiency (LEP) persons residing in Jacksonville.

History: Under Federal law Title VI of the Civil Rights Act of 1964, discrimination was made illegal in programs that received federal financial assistance. In particular for LEP persons, it protects individuals on the basis of their race, color, or national origin. In certain situations, failure to ensure that persons who have LEP can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against race/ethnicity and national origin discrimination.

Persons who, as a result of their race/ethnicity and national origin, and who do not speak English as their primary language and have limited ability to speak/read/write, or understand English may be entitled to language assistance under Title VI in order to receive City services, benefits, and/or participate in City sponsored programs.

Four-Factor Analysis: When a recipient has undertaken efforts to comply with regulations requiring the needed translation of materials. There is no specific method for ensuring compliance but undertaking a four-factor analysis, adoption of a Language Access Plan (LAP) for vital materials, and making necessary translation will be "strong evidence" of compliance.

Factor 1: Determine the number or proportion of LEP persons in the eligible service population. HUD provides the following guidance for what documents should be provided and when:

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more LEP persons in eligible population	Translate vital documents
>5% of eligible population and more than 50 are LEP persons	Translate vital documents
>5% of eligible population and 50 or less are LEP persons	Translated written notice of right to receive free oral interpretation of documents
5% or less of eligible population and less than 1,000 are LEP persons	No written translation required

Factor 2: The frequency with which LEP persons come in contact with the program

Factor 3: The nature and importance of the program, activity, or service

Factor 4: The resources available and costs to the recipient

Examples of language assistance includes but is not limited to: oral interpretation, bilingual staff, telephone service lines interpreter, written translation services, notices to staff and recipients

about the availability of LEP services; or referrals to community liaisons. When the four-factor analysis is complete the jurisdiction should produce a Language Access Plan and follow thru with the plan.

Factor 1: Size of LEP Population

Overall, Jacksonville-Duval County has a significant limited English proficiency population that may require translation services. In 2015, an estimated 41,812 individuals spoke English less than “very well,” with Spanish speaking individuals the largest part of this group with 17,806 (2011-2015 ACS 5-Yr Estimates, B16001, the most recent year data was available).

Due to the importance of HUD programs and the universal availability of some programs the entire jurisdiction was analyzed. Additional four-factor analyses can be conducted on a program basis with a more limited geographic range.

The table below displays the number of households with the primary language spoken at home and how many households are limited English-Speaking Households (LEP). Spanish speaking households are the largest group with a primary language spoken at home other than English with 23,170 households, or 7.2%. An estimated 3,945 are LEP, or 1.2% of the percent of total households in Jacksonville.

Language	Primary Language Spoken at Home		Limited English-Speaking Households		
	#	%	#	% of Total Households	% of Prim. Home Lang.
All Households	322,003	--	9,245	2.9%	--
Spanish	23,170	7.2%	3,945	1.2%	17.0%
Other Indo-European	12,349	3.8%	2,162	0.7%	17.5%
Asian and Pacific Island	11,710	3.6%	2,459	0.8%	21.0%
Other	3,032	0.9%	679	0.2%	22.4%

Source: 2012-2016 American Community Survey 5-Year Estimates

HUD Comprehensive Housing Affordability Strategy (CHAS) data display the extent of housing problems and needs in particular for low-income households. While the CHAS data does not specifically count the number of low-income LEP speaking households, it captures how many households by race/ethnicity there are in regards to income categories in the City. According to the 2013-2017 ACS, 25.9% of Hispanic individuals are LEP, for foreign-born residents the LEP rate is 53.3%. As households with Spanish spoken at home as a primary language are predominately Hispanic households.

In Duval County, the median earnings for foreign-born residents is less than native born, which means a greater economic need and potentially higher rates of cost burdened households. Below is the estimated number of Hispanic households in the City with extremely low-income and low-

income. Over half of Hispanic households in Jacksonville are LMI. Hispanic-speaking LMI households disproportionately need housing assistance, which means resources need to be translated into Spanish.

TABLE: HUD Area Median Family Income					
	0-30% HAMFI	30-50% HAMFI	50-80% HAMFI	80-100% HAMFI	Total LMI
Hispanic Households	3,491	3,236	4,560	2,350	13,637
Source: 2010-2014 CHAS					

Factor 2: Frequency of Contact

Housing services require ongoing communication and needs to be available throughout the year. Depending on the program specifics, procedures will vary as detailed in the LAP. Race and Ethnicity beneficiaries are reported in the City’s annual Consolidated Annual Performance Report to HUD. In the following table, it shows the race/ethnic composition of households or individuals assisted in Jacksonville by entitlement program. The only program where there is more than 5% Hispanic households assisted is the HOME Investment Partnerships program.

Racial and Ethnic Composition of Households/Individuals Assisted

	CDBG	HOME	ESG	HOPWA
White	30529	41	751	238
Black or African American	44714	166	1952	1078
Asian	1561	3	8	6
American Indian or American Native	39	0	9	0
Native Hawaiian or Other Pacific Islander	58	0	4	0
Total	76901	210	2724	1322
Hispanic	104	11	105	0
Not Hispanic	83078	201	2659	1373

Source: City of Jacksonville 2017 CAPER

CDBG: Less than 1% of persons assisted were Hispanic.

HOME: Approximately 5.2% of the households assisted were Hispanic.

ESG: Approximately 3.8% of persons assisted were Hispanic

HOPWA: There were no Hispanic persons recorded as assisted in the HOPWA program.

Factor 3: Nature and Importance of the Program

Per the “Department of Housing and Urban Development Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons”, HUD programs play a critical role in the community and should rank high on the critical/non-critical continuum. The importance will vary depending on each program, but the housing department as a whole is critical.

Factor 4: Available Resources

Given the limited resources available, it is imperative that a cost/benefit analysis is done when considering translation efforts for each program. It is difficult to gauge whether a community's participation (or lack thereof) is due to failed outreach efforts or if they generally do not have a need. With eight different LEP communities in the jurisdiction it may not be possible to have translation services available at all times. However, efforts can be made to show compliance with Title VI.

In general, all documents should be available in Spanish and it would be incredibly beneficial if a staff member could also serve as a point of contact for the Spanish LEP community. The remainder LEP populations should be targeted on a project-by-project basis. The jurisdiction should also reach out to community leaders who may be able to provide translation services. Regardless, every language mentioned above should be made aware of their right to a free oral translation of documents upon request.

Conclusion

To assist in showing strong evidence for compliance with Title VI's prohibition against discrimination, the Jacksonville-Duval County Housing and Community Development Division should produce a thorough Language Access Plan. This plan should provide guidance for the creation of translated documents on a program-by-program basis and for the division as a whole. Particular care should be taken to ensure documents are prepared ahead of time for any disaster relief to minimize delays in service for households harmed by hurricanes or similar natural disasters

Language Access Plan

As a result of the Four-Factor Analysis, the City of Jacksonville has determined persons with limited English proficiency who primarily speak Spanish are in-need of language assistance. For this purpose, the City has identified the following types of language assistance to be provided as needed throughout HUD entitlement programs CDBG, HOME, ESG and HOPWA:

- All public notices and published citizen participation advertisements will include a statement that services and program materials are available in Spanish upon request.
- All citizen participation notices will include a statement that translators will be available at public meetings upon prior request.
- If needed, a translator may be retained to provide oral translation at public meetings and hearings, and also during the implementation of the project activities (as needed for housing and public services).
- If other populations of LEP persons are identified in the future, the City of Jacksonville will consider additional measures to serve the language access needs of those persons.

Adopted: _____

Chief Elected Official

Date