

CITY OF WALNUT CREEK

Community Development Block Grant (CDBG) Program

Citizen Participation Plan

Consistent with the U.S. Department of Housing and Urban Development (HUD) Consolidated Plan requirements, the City of Walnut Creek (the “City”) has revised its Citizen Participation Plan (the “Plan”). Implementation of the Plan will enable the community to discuss housing and community development needs, and the proposed allocation of funds available to address those needs.

Through the Plan, the City hopes to obtain a broad perspective of housing and community development needs from citizens and organizations involved in affordable housing and community development activities. It is intended to provide for and encourage citizen participation with particular emphasis on participation by persons of very low- and low-income who are residents of the City. The City will consult with other public and private agencies that provide emergency housing for homeless, assisted housing for special needs populations, transitional housing, health services, social services, and infrastructure needs. The City will also consult with participating Urban County¹ jurisdictions and Consortium² cities, particularly concerning problems and solutions that go beyond a single jurisdiction.

The City’s Community and Economic Development - Housing Division Staff have the responsibility for administration of the Fair Housing Planning process and the Consolidated Plan process, which includes all activities related to development and dissemination of Assessments of Fair Housing (AFH), 5-Year Consolidated Plans, Annual Action Plans, and Consolidated Annual Performance Evaluation Reports (CAPER).

Additional information may be obtained from the following:

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¹The Urban County consists of all of Contra Costa with the exception of the cities of Antioch, Concord, Pittsburg, and Walnut Creek. These cities are separate entitlement jurisdictions under the CDBG program.

² For the purposes of the HOME program, the Consortium includes the Urban County and the cities of Antioch, Concord, Pittsburg, and Walnut Creek.

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I. Goals

The four major goals of the City citizen participation process are as follows:

1. To provide citizens with adequate and timely information about the range of activities that may be undertaken through its CDBG program (“Program”), the kinds of activities previously funded in the City, the level of funding available to carry out these activities, and the estimated amount of funds that will benefit very low- and low-income persons;
2. To provide and encourage an appropriate means to ensure public participation, especially the involvement of very low and low-income residents most likely to be affected by the Program and to provide reasonable efforts to ensure continuity of involvement of citizens or citizen organizations throughout all stages of the Program.
3. To provide citizens with an adequate opportunity to articulate needs, express preferences about proposed activities, assist in the selection of priorities, and the development of the Program, the AFH, the 5-Year Consolidated Plan (ConPlan), the Annual Action Plan, and the CAPER;
4. To provide citizens with the opportunity to assess and submit comments on all aspects of program performance; and

II. Process

The City, in its citizen participation process, has instituted a variety of activities to accomplish the above-stated goals:

A. Assessment of Fair Housing

The Housing Division will present a proposed five-year AFH in a public hearing held by the City Council. This AFH will assist the City through incorporation of

the purposes and policies of the Fair Housing Act in its planning processes. The Fair Housing Act prohibits discrimination and mandates that HUD funded programs and participants “take significant actions to overcome historic patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice and foster inclusive communities that are free from discrimination,” per Affirmatively Furthering Fair Housing rules and regulations.

The following general steps will be followed in developing the AFH:

1. At least three citizen/community and/or focus group meetings will be held. The citizen/community/focus group meetings may be held in conjunction with the 5-Year Consolidated Plan process described below in Section II.B.

At these citizen/community/focus group meetings, citizens are encouraged to participate in the development and any revisions to the AFH, particularly, participation by low- and moderate-income persons and by residents of predominately very-low and low-income neighborhoods, as may be defined by HUD and/or the City. The Housing Division shall take appropriate action to encourage all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities, to participate.

2. The Housing Division shall encourage the participation of local and regional institutions, Continuums of Care, and other organizations (including businesses, developers, nonprofits, philanthropic organizations and communities-based and faith-based organizations) during the development and implementation of the AFH.
3. The Housing Division shall encourage participation with the Contra Costa County Housing Authority (local PHA), residents of any public and/or subsidized/assisted housing developments in Walnut Creek, resident advisory boards, resident councils and resident management corporations, along with other low-income residents of targeted revitalization areas in which the developments are located, during the development of the AFH. The Housing Division shall make an effort to provide information regarding the AFH, Affirmatively Furthering Fair Housing strategy activities related to its developments and any surrounding communities so that the PHA may make this information available at the annual public hearing(s) for the PHA Plan.

4. The Housing Division shall take reasonable steps to provide language assistance to ensure meaningful access to participation by non-English speaking residents of the community. The Housing Division assesses language needs through its Language Access Plan (LAP) and its four-factor analysis, which considers: a) the number of or proportion of LEP persons served or encountered in the eligible service population; b) the frequency with which LEP persons come into contact with the program; c) the nature and importance of the program; and, d) the resources available and costs to the City.
5. As soon as feasible following the start of the public participation process, the Housing Division shall make the HUD-provided data available and any other supplemental information the Housing Division plans to incorporate into its AFH available to its residents, public agencies and other interested parties. The Housing Division may make the HUD-provided data available to the public by cross-referencing to the data on HUD's web site.
6. A notice of the Draft AFH and summary of the contents shall be published in a newspaper of general circulation and posted to the Housing Division's website at least thirty (30) days prior to the date of the public hearing of the City Council. The notice will also announce the dates of the public hearing, and the date, time and address to send written public comments on the Draft AFH and the locations where a reasonable number of free copies of the proposed AFH may be obtained. The summary shall describe the content and purpose of AFH and include a list of libraries, government offices and public places where copies of the entire Draft AFH may be examined.
7. After a 30-day public comment period, the Housing Division staff will consider any comments received in writing, or orally at the public hearing, and if necessary, make appropriate changes to the proposed AFH. A summary of these comments or views and a summary of any comments or views not accepted and the reasons why, shall be attached to the final AFH.
8. The final AFH is sent to the U.S. Department of Housing and Urban Development. Copies of the final AFH are published on the Housing Division's web site and a reasonable number of free copies are available to the public and in a form accessible to persons with disabilities, upon request.

B. 5-Year Consolidated Plan

The Housing Division will present a proposed ConPlan for the allocation of CDBG resources at a public hearing of the City Council. The ConPlan must be completed in a timely manner for submission to HUD. The ConPlan is considered by the City Council for approval. The following steps will be followed in developing the ConPlan:

1. The first stage of ConPlan development is the analysis of the AFH and the determination of needs based upon input from the general public, neighborhood associations, and other interested parties. The Housing Division staff will set a timetable with benchmarks to ensure that work on the ConPlan is accomplished in a timely manner.
2. During this process at least three citizen/community and/or focus group meetings will be held. Citizens are encouraged to discuss community needs in various areas such as affordable housing, economic development, infrastructure/public facilities, and public services. The discussions are structured to identify unmet needs of very low- and low-income households that can be addressed through the Program, and to identify appropriate projects and programs to meet those needs.
 - a. Citizens are encouraged to participate in the development and any revisions to the ConPlan. Particularly, participation by low- and moderate-income persons, especially those persons living in predominately very-low and low-income neighborhoods, as may be defined by HUD and/or the Housing Division. The Housing Division shall take appropriate action to encourage all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities, to participate.
 - b. The Housing Division shall encourage the participation of local and regional institutions, Continuum of Care, and other organizations (including businesses, developers, nonprofits, philanthropic organizations and communities-based and faith-based organizations) during the development and implementation of the ConPlan. Commencing with consolidated plans submitted on or after January 1, 2018, such consultations shall include broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas,

public land or water resources, and emergency management agencies in the process of developing the consolidated plan.

- c. The Housing Division shall encourage participation with the Contra Costa Housing Authority (local PHA), residents of public housing and/or subsidized/assisted housing developments in Walnut Creek, resident advisory boards, resident councils and resident management corporations, along with other low-income residents of targeted revitalization areas in which the developments are located, during the development of the Plan. The Housing Division shall make an effort to provide information regarding the ConPlan activities related to its developments and any surrounding communities so that the PHA may this information available at the annual public hearing(s) for the PHA Plan.
3. The second stage of ConPlan development is the review of all input. The Housing Division staff will conduct a preliminary review to assess feasibility and eligibility. The Housing Division staff shall then prepare a listing of the priority needs based on all input. The Housing Division staff will use this listing to recommend a broad range of strategies by category based upon identified needs and input at public meetings, hearing(s) and other forums.
4. During the third stage of ConPlan development, the Housing Division recommends the range of subprograms and the appropriate percentage of the estimated total funds (including grant funds and program income) to be allocated to each eligible subprogram (for example, public facilities and improvements, housing, public services, and economic development). It will also include the estimated amount that will benefit persons of low- and moderate-income. This document becomes the Draft ConPlan. A notice announcing the availability of the Draft ConPlan for public review will be posted in a newspaper of general circulation at least thirty (30) days prior to the proposed City Council public hearing to consider the Draft ConPlan for approval. The Draft ConPlan will be available for review and public comment for at least thirty (30) days prior to the proposed City Council meeting to consider the Draft ConPlan for approval.
5. Staff will consider any written comments received during the comment period or oral comments received during the City Council public hearing, and if necessary, make appropriate changes to the Draft ConPlan.

6. The final ConPlan is sent to HUD for approval. Copies of the final ConPlan are published on the Housing Division's web site and a reasonable number of free copies are available to the public and in a form accessible to persons with disabilities, upon request.

C. Annual Action Plan

1. The Annual Action Plan process begins with a Notice of Funding Availability (NOFA) for CDBG funds issued jointly for all Consortium members. The NOFA is posted on the Housing Division's website, distributed to the Consortium's interested parties list, and published in a newspaper of general circulation. The NOFA announces an annual public "kickoff" meeting for the CDBG program, as well as the other HUD programs administered by the County, including HOME, ESG, and HOPWA. This meeting is designed to encourage very low- and low-income persons, members of minority groups, members of non-English speaking groups, and other residents to express their views and ideas of what they perceive as community development and housing needs in the City. The widely-publicized public meeting is held to advise residents and nonprofit organizations of program requirements and processes to be followed in developing and approving applications. Information about the amount of program funds to be available for housing and community development activities, and for planning and administrative activities is provided, if that information is available at that time. In addition, the range of activities that may be undertaken with these funds and the kinds of projects and programs previously funded are explained. The application, evaluation and approval process are also explained as well as the process timeline to facilitate citizen participation.
2. To facilitate the involvement of very low- and low-income persons, non-English speaking persons, and residents in areas most likely to be affected by the Program, staff provides technical assistance in developing project proposals, upon request. Information and technical assistance is also provided to community organizations so they may adequately develop project proposals and participate in planning and assessing the Program.
3. Additional public meetings may be held at various stages of the Annual Action Plan funding process. Meetings are scheduled at times and locations that permit broad participation by very low and low-income persons. When needed or upon

request, translators are made available for non-English speaking attendees and the hearing-impaired.

4. The Housing Division has a formal proposal and evaluation process to guide the evaluation, prioritization, and selection of project proposals for funding. This process is used by staff to evaluate each proposal according to the following criteria: (1) eligibility, (2) ability to meet one of the national objectives, (3) target population and demonstrated need, (4) financial analysis, (5) experience and capacity, (6) project readiness and timeliness, (7) past performance, and (8) environmental, historical preservation, relocation, and prevailing wage issues. Staff reports are made available to all applicants prior to the public hearing for consideration of staff's funding recommendations by the Council Housing and Community Development Committee and by the City Council.
5. A notice for the Draft Action Plan and summary of the available funding for each Program will be published in a newspaper of general circulation and posted to the Housing Division's website at least thirty (30) days prior to the City Council public hearing date to consider the Action Plan. The notice will also announce the dates of the public comment period, and the date, time and address of the City Council public hearing on the proposed Action Plan and the location where a reasonable number of free copies of the Draft Action Plan may be obtained. The Draft Action Plan will be available for review and public comment for at least 30 days prior to the proposed City Council public hearing to consider the Draft Action Plan for approval.
6. Staff will consider any written comments received during the comment period or oral comments received during the City Council public hearing, and if necessary, make appropriate changes to the Draft Action Plan.
7. The final Action Plan is sent to HUD for approval. Copies of the final Action Plan are published on the Housing Division's web site and a reasonable number of free copies are available to the public and in a form accessible to persons with disabilities, upon request.

D. Consolidated Annual Performance and Evaluation Report

Every year, the Housing Division must submit to HUD the CAPER within 90 days of the close of the program year, by September 30th. In general, the CAPER describes how funds were actually spent and the extent to which these funds

were used for activities that benefited very-low and low-income people. The purpose of the CAPER is to account for each CDBG funded activity in each program year, until the project is "closed-out" in accordance with program requirements.

1. The CAPER shall be made available for review and comment. Notice, public review, and public comments will be made in accordance with the following procedures:
 - a. The Housing Division shall provide at least fifteen (15) days advance notice of and availability of a Draft CAPER before there is a public meeting regarding the CAPER. The CAPER notice will be published in an area newspaper of general circulation in addition to being posted on the Housing Division's website.
 - b. A complete copy of the Draft CAPER will be made available to the public. Copies will also be made available at locations as indicated in this Citizen Participation Plan under Accessibility of Information.
 - c. A City Council public meeting will be held to consider accepting the CAPER. Public comments will be accepted during a fifteen (15) day comment period prior to the City Council public meeting as described in the public notice.
 - d. In preparing the CAPER for submission to HUD, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public meeting or submitted in writing. The Annual Performance Report sent to HUD will have a "public comment" section that presents all comments and staff explanations. [24 CFR 91.105(d)(2)]
 - e. The final CAPER is submitted to HUD for approval.

III. Accessibility of Information

The following information will be available to the public through the Housing Division in the City's Community and Economic Development Department during normal working hours:

- a. All mailing and promotional materials.
- b. Records of public meetings.
- c. All key documents, including applications, letters of approval, performance reports, and any other reports required by HUD.
- d. Copies of the regulations and issuances governing the Program.
- e. Explanation of important Program requirements, such as contracting and operations procedures, environmental policies, fair housing, and other equal opportunity requirements, and relocation provisions.
- f. A copy of the Citizen Participation Plan.
- g. Copies of each written comment or complaint about the Program's performance, and a description of any actions taken and/or written response.

Copies of the ConPlan, Action Plan, and any Substantial Amendments shall also be made available at a minimum of one of the Walnut Creek libraries. A summary of the public meetings, noticing, and publishing schedule is attached in Appendix A. A sample calendar is attached in Appendix B.

IV. Substantial Amendments to the Consolidated Plan or Action Plan

If after the Consolidated Plan, AFH, or Action Plan has been submitted to HUD, changes are proposed in the use of Program funds (provided the proposed change in funding is greater than \$25,000 or 10 percent of a project's total allocation, whichever is greater) from one eligible activity to another, this shall constitute a Substantial Amendment. A change in project/program scope, location and/or beneficiaries will be considered a change in eligible activity. Citizens will be given reasonable notice and an opportunity to comment on Substantial Amendments made to the ConPlan, AFH, or Action Plan.

Minor amendments to the Consolidated Plan shall be made administratively and incorporated into the CAPER at the end of each program year. A minor amendment shall be one that maintains the integrity of the plan while providing flexibility to meeting the stated goals and objectives. Minor adjustments in funding levels for public service, administration, or economic development/ housing activities/ infrastructure and public facilities due to differences in actual versus anticipated program income shall not be considered substantial.

There will be a public review period of thirty (30) days during which written or verbal comments on the Substantial Amendment may be made before the City Council takes action on the amendment. A public notice will be published in at least one local newspaper

of general circulation, and posted at 1666 North Main Street, Walnut Creek, 94596 at least thirty (30) days prior to the meeting. The notice shall describe the proposed amendment and provide the date for the City Council action on the amendment. The notice will be made available in formats accessible to persons with disabilities, upon request. Any comments received will be presented to the City Council prior to their taking action. A summary of the comments will be attached to the Substantial Amendment upon submission to HUD.

V. Revisions to an Accepted AFH

The City will revise the AFH previously accepted by HUD when a material change, as defined in 24 CFR 5.164 occurs or upon HUD's written notification specifying a material change that requires revision. The City will follow the participation process applicable to consolidate plan substantial amendments as outlined in Section VI. Upon completion, any revision to the AFH will be made public and submitted to HUD.

VI. Eligible Activities within ConPlan

Non-housing Community Development – The City Council adopted the following goals for programs/projects funded with CDBG funds:

- (a) CD-1: General Public Services: Assist in providing opportunities and services to improve the quality of life for lower-income persons.
- (b) CD-2 Senior Services: Enhance the quality of life of senior citizens and frail elderly, and enable them to maintain independence.
- (c) CD-3: Youth: Increase opportunities for children/youth to be healthy, succeed in school, and prepare for productive adulthood.
- (d) CD-4: Non-Homeless Special Needs Population: Assist in providing opportunities and services to improve the quality of life and independence for persons with special needs, such as disabled persons, battered spouses, abused children, persons with HIV/AIDS, and low-income veterans.
- (e) CD-5: Fair Housing: Continue to promote fair housing activities and affirmatively further fair housing.

- (f) CD-6: Economic Development: Reduce the number of persons with incomes below the poverty level, expand economic opportunities for very low- and low- income residents.
- (g) CD-7: Public Facility, Infrastructure and Accessibility: Maintain quality public facilities and adequate infrastructure, and provide access for lower-income persons and persons with special needs.
- (h) CD-8: Administration: Support development of viable urban communities through extending and strengthening partnerships among all levels of government and the private sector, and administer federal grant programs in a fiscally prudent manner.

Housing –The Consolidated Plan establishes the following priorities for affordable housing programs and projects funded with Program funds:

Affordable Housing

- (a) AH-1: Expand housing opportunities for extremely low-income, very low-income, low-income, and moderate-income households through an increase in the supply of decent, safe, and affordable rental housing and rental assistance.
- (b) AH-2: Increase homeownership opportunities for Low-to-Moderate Income households.
- (c) AH-3: Maintain and preserve the existing affordable housing stock, including single family residences and apartments owned and occupied by Low-to-Moderate Income households.
- (d) AH-4: Increase the supply of appropriate and supportive housing for special needs populations, including seniors, persons with disabilities, persons with HIV/AIDS, Low-to-Moderate Income veterans, the homeless, and extremely low-income residents.

Homelessness

- (a) H-1: Assist the homeless and those at risk of becoming homeless by providing funding to organizations that provide emergency shelter, and

transitional and permanent affordable housing with appropriate supportive services.

(b) H-2: Reduce the incidence and risk of homelessness and assist in alleviating the needs of the homeless.

VII. Residential Anti-displacement and Relocation Assistance Plan

The City will comply with all applicable federal regulations, such as the Uniform Relocation Assistance Act, when using CDBG funds.

Additionally, the City has local relocation assistance requirements in certain circumstances of displacement that will also be strictly adhered to.

VIII. Complaint Process

Citizens have an opportunity to register complaints by letter, telephone, email, or in person directly to the Housing Division at the following address: Community and Economic Development Department – Housing Division, 1666 North Main Street, Walnut Creek, California, 94596, by calling (925) 943-5899 x 2208, or emailing Ernst@walnut-creek.org.

All written complaints will be answered in writing within 15 working days. Citizens are encouraged to initially register complaints by telephone, directly to the program staff involved in the relevant program, since oftentimes complaints can be resolved satisfactorily at this level. Staff will investigate complaints and respond as quickly as possible. Staff will respond in writing to all written citizen complaints within fifteen (15) working days of their receipt, where practicable.

Any citizen not satisfied by the response of the Housing Division Program staff, may request further review of their complaint by the Community and Economic Development Director. The Director will respond in writing to all written complaints within thirty (30) working days of their receipt, where practicable.

Citizens may also file complaints directly to HUD. Per HUD procedures, HUD will forward the complaint to the City Manager's Office. A copy of the letter accompanying the complaint will be sent to complainant. The City Manager's Office has fifteen (15) working days from the date of the HUD letter to respond directly to the complainant and must forward a copy of the response to HUD for their review.

All documentation including final disposition of the complaint will be retained by the Housing Division for a period of no less than three years from the date of disposition.

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APPENDIX A

Summary of Public Meetings, Noticing, and Publishing

1. 5-Year Consolidated Plan

- (a) At least three citizen/community and/or focus group meetings

Noticing: By invitation and published at least one local newspaper of general circulation at least thirty (30) days prior to the first meeting. The notice is also posted on the Housing Division's website.

- (b) At least two public meetings

- i. During development

Noticing: Letters (regular U.S. mail and/or email) are sent to interested party mailing list and posted on the City's website and at 1666 North Main Street, Walnut Creek at least ninety-six (96) hours prior to the date of the meeting.

- ii. City Council Meeting to approve Consolidated Plan

Noticing: Letters (regular U.S. mail and/or email) to interested party mailing list and published in at least one local newspaper of general circulation at least thirty (30) days prior to the date of the meeting. The notice is also posted at the Housing Division offices located at 1666 North Main Street, Walnut Creek, CA. The notice includes a summary of the proposed plan. The notice is also posted on the Housing Division's website.

- (c) Publishing: A copy of the ConPlan will be made available at a minimum of one public library in the City, as well as the Housing Division office and the Housing Division's website.

2. Annual Action Plan – 1st Year of Two-Year and Three-Year Funding Cycles (“Non-housing” and “Housing” Community Development priorities)

- (a) Notice of funding availability (NOFA)

Noticing: Letters (regular U.S. mail and/or email) are sent to interested party mailing list and published in at least one local

newspaper of general circulation at least thirty (30) days prior to application due date.

(b) At least two public meetings

i. During development

Noticing: Letters (regular U.S mail and/or email) are sent to all CDBG applicants and meeting notice posted on the City's website and at 1666 North Main Street, Walnut Creek at least ninety-six (96) hours prior to the date of the meeting.

ii. City Council Meeting to approve Action Plan

Noticing: A notice is published in at least one local newspaper of general circulation at least thirty (30) days prior to the date of the meeting, and the notice is also posted at the Housing Division's offices located at 1666 North Main Street, Walnut Creek, CA.

Website: The notice is also posted on the Housing Division's website.

(c) Publishing: A copy of the Action Plan will be made available at a minimum of one library in the City, as well as the Housing Division office and the Housing Division's website.

3. Annual Action Plan – Renewal Years of the Two-Year and Three-Year Funding Cycles (“Housing” Community Development priorities only)

(a) Notice of funding availability (NOFA)

Noticing: Letters (regular U.S mail and/or email) are sent to interested party mailing list (housing related categories) and published in at least one local newspaper of general circulation at least thirty (30) days prior to application due date.

Website: Notice is also posted on City and County DCD's website.

(b) At least two public meetings

i. During development

Noticing: Letters (regular U.S mail and/or email) to all CDBG applicants and meeting notice posted on the City's website and at 1666 North Main Street, Walnut Creek at least ninety-six (96) hours prior to the date of the meeting.

- ii. City Council Meeting to approve Action Plan
Noticing: Published in at least one local newspaper of general circulation at least thirty (30) days prior to the date of the meeting, and posted at 1666 North Main Street, Walnut Creek, CA.
Website: Notice is also posted on the Housing Division's website.

4. Substantial Amendment

(a) At least one public meeting

- i. City Council Meeting to approve Amendment

Noticing: Published in at least one local newspaper of general circulation and posted at 1666 North Main Street, Walnut Creek, CA at least thirty (30) days prior to the date of the meeting. The notice is also posted at the Housing Division's offices located at 1666 North Main Street, Walnut Creek.

Website: The notice is also posted on The Housing Division's website.

- (b) Publishing: A copy of the Action Plan will be made available at a minimum of one public library in the City, as well as on the Housing Division website and at the Housing Division office.

5. Consolidated Annual Performance and Evaluation Report (CAPER)

(a) City Council Meeting to approve CAPER

Noticing: Published in at least one local newspaper of general circulation at least fifteen (15) days prior to the date of the meeting. The notice will also be posted at the Housing Division's offices located at 1666 North Main Street, Walnut Creek.

Website: Notice is also posted on the Housing Division's website.

Publishing: A copy of the CAPER will be made available at one library in each of the three regional areas of the City, as well as on the Housing Division's website and at the Housing Division office.

APPENDIX B

Sample Calendar

September	Issue Request for Proposals (Funding Availability)
October/November	Conduct Funding Kickoff Meeting
December	Applications due
January/February	Follow up questions with applicants
March/April	Applicant presentations to the Council Housing and Community Development Committee and committee recommendations
May	City Council review and approval of Action Plan Submit Action Plan to HUD
June	Subrecipient Meeting, and Contract Negotiations
July	Start of new Fiscal Year
August	Program monitoring (ongoing through May) Public Notice of CAPER
September	CAPER submitted to HUD
October	Semi-annual labor standards report MBE/WBE Report