

CITIZEN PARTICIPATION PLAN
for
SHELBY COUNTY DEPARTMENT OF HOUSING

(Adopted on May 11, 2020)



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Introduction

The Consolidated Plan (Plan) and Assessment of Fair Housing (AFH) are required by the U.S. Department of Housing and Urban Development (HUD) for jurisdictions to receive federal housing and community development funding. Shelby County Government receives Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funding annually. The Plan examines the housing and community development needs of the County, sets priorities for the CDBG and HOME, funds, establishes an Annual Action Plan for meeting current and future needs, and identifies the County's performance in meeting its annual goals through the Consolidated Annual Performance Evaluation Report (CAPER). The AFH replaces the previous Analysis of Impediments to Fair Housing (AI) to assist the County in identifying fair housing issues and related contributing factors to achieve comprehensive community development goals and affirmatively further fair housing. The Plan and AFH are also required to have a strategy for citizen participation in the planning process.

A requirement for the Plan and AFH is a citizen participation plan that sets for the County's policies and procedures for citizen participation. The purposes of this Citizen Participation Plan are to:

- Provide for and encourage citizen participation in the development of the Plan including the 5-Year Strategy, Annual Action Plan, and any substantial amendments to the Plan, the Consolidated Annual Performance and Evaluation Report (CAPER), the AFH and any of its revisions prior to their submittal to HUD;
- Encourage effective citizen participation, with particular emphasis on participation by persons of low- and moderate-income who live in the community development areas encompassed by the Urban County Entitlement area; and minority groups in implementing these federally funded programs in accordance with the federal regulations found at 24 CFR Part 91.

Further specific information about the CDBG program can be found at 24 CFR Part 570 and further specific information about the HOME program can be found at 24 CFR Part 92.

The Citizen Participation Plan also describes how the Shelby County Department of Housing (SCDH) will handle and respond to citizen comments and complaints. It also described the process for developing the Plan, amending it, reviewing performance, offering technical assistance, and other activities including the AFH.

This Citizen Participation Plan is revised in accordance with a HUD memorandum from the Principal Deputy Assistant Secretary, Community Planning and Development, to All CPD Formula Programs Grantees with regard to Incorporating 24 CFR Part 5 Affirmatively

Furthering Fair Housing into 24 CFR 91.10 Consolidated Program year, 24 CFR 91.105 Citizen participation plan for local governments.

In the event that HUD suspends or delays the submission of the AFH, the legal obligation to affirmatively further fair housing will continue. Until required to submit an AFH according to the suspension date, Shelby County will affirmatively further fair housing by: conducting an analysis of impediments (AI) to fair housing choice, taking appropriate actions to overcome the effects of any impediments, and keeping records reflecting the analysis and actions.

I. OVERVIEW OF CITIZEN PARTICIPATION

A. Philosophy

SCDH recognizes the importance of public participation in both defining and understanding current housing, community development, and fair housing needs, and prioritizing resources to address those needs. The County's Citizen Participation Plan is designed to provide residents of all ages, genders, economic levels, races, ethnicities and special needs equal access to become involved in the Plan each year. This document also serves as the County's Citizen Participation Plan for the use of CDBG, HOME, CDBG-DR, and other HUD grants and programs operated by Shelby County where applicable. This Citizen Participation Plan was written in accordance with Section 91.105 of HUD's Consolidated Plan regulations.

Additionally, communication between citizens and government officials/employees responsible for carrying out federally funded housing and community development programs serves to increase understanding and improve the delivery of SCDH's services and programs.

Accordingly, it is the philosophy and policy of SCDH to encourage maximum citizen participation among all populations and needs groups, and in order to ensure that their issues and concerns are adequately addressed, the County will follow the standards set forth in its adopted Citizen Participation Plan during development of its Consolidated Plan, Substantial Amendments, Annual Action Plan, Assessment of Fair Housing and CAPER. The participation process will be developed and monitored by the Shelby County Department of Housing and will include individual citizens, neighborhood residents and organizations; social service, advocacy and nonprofit agencies; private sector businesses and institutions; and elected officials and government agencies whose missions and interests overlap with those of SCDH.

The Consolidated Plan and AFH process offers opportunities for resident participation through public meetings and review of draft documents. The County will ensure the participation of persons with special needs and/or persons who are often underrepresented in public process and organizations that represent such persons of low-income, persons of color, non-English speaking persons, persons with disabilities, persons with AIDS, and persons who are homeless. SCDH further endeavors to ensure the participation of local and regional institutions including Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations. In conjunction with public

housing agency consultations, residents of public and assisted housing developments, including any resident advisory boards, resident councils, and resident management corporations, along with other low-income residents are encouraged to participate.

B. HUD Requirements

The overall goal of community development and planning programs administered by HUD, as described at 24CFR Part 91.1, is “to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons. The primary means to this end is to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and not-for-profit organizations in the production and operation of affordable housing.”

The Consolidated Plan requires SCDH to state in one document its plan to pursue goals for community planning and development and housing programs.

In accordance with HUD regulations at 24 CFR Part 91.100, SCDH will, during the course of preparing the Consolidated Plan:

- Consult with other public and private agencies that provide assisted housing, health services, and social services (including those focused on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons).
- Consult with state and local health and child welfare agencies when SCDH is preparing the portion of its consolidated plan concerning lead-based paint hazards. SCDH will also examine existing data related to lead-based paint hazards and poisonings, including health department data on the location of housing units in which children have been identified as lead poisoned.
- Notify adjacent units of local government, to the extent practicable, when preparing the description of priority non-housing community development needs.
- Consult with adjacent units of local government, particularly regarding problems and solutions that go beyond a single jurisdiction.
- Assist the City of Memphis, to the extent practicable, with its application for HOPWA (Housing Opportunities for People with AIDS) funds, as such funds become available.
- Consult with local public housing authorities concerning public housing needs and public housing Comprehensive Grant program activities.

C. HUD Waivers

On April 1, 2020, HUD released a memorandum on Availability of Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19. Two waivers were made available in relation to consolidated plan requirements and are detailed below. Shelby County Government will use the two waivers to consolidated plan requirements through the end of program year 2020 which is June 30, 2021.

Citizen Participation Public Comment Period for Consolidated Plan Amendment Requirement:
30-day Public Comment Period.

Citations: 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401

Explanation: A CPD grantee may amend an approved consolidated plan in accordance with 24 CFR 91.505. Substantial amendments to the consolidated plan are subject to the citizen participation process in the grantee's citizen participation plan. The citizen participation plan must provide citizens with 30 days to comment on substantial amendments.

Justification: Given the need to expedite actions to respond to COVID-19, HUD waives 24 CFR 91.105(c)(2) and (k), 91.115(c)(2) and (i) as specified below, in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG, HOME, HTF, HOPWA or ESG funds.

Applicability: This 30-day minimum for the required public comment period is waived for substantial amendments, provided that no less than 5 days are provided for public comments on each substantial amendment. The waiver is available through the end of the recipient's 2020 program year. Any recipient wishing to undertake further amendments to prior year plans following the 2020 program year can do so during the development of its FY 2021 Annual Action Plan.

Implementation in Shelby County: Effective May 11, 2020 through June 30, 2021, the citizen participation public comment period for substantial amendments is 5 days.

Citizen Participation Reasonable Notice and Opportunity to Comment Requirement:
Reasonable Notice and Opportunity to Comment.

Citations: 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401

Explanation: As noted above, the regulations at 24 CFR 91.105 (for local governments) and 91.115 (for States) set forth the citizen participation plan requirements for recipients. For substantial amendments to the consolidated plan, the regulations require the recipient to follow its citizen participation plan to provide citizens with reasonable notice and opportunity

to comment. The citizen participation plan must state how reasonable notice and opportunity to comment will be given.

Justification: HUD recognizes the efforts to contain COVID-19 require limiting public gatherings, such as those often used to obtain citizen participation, and that there is a need to respond quickly to the growing spread and effects of COVID-19. Therefore, HUD waives 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401 as specified below to allow these grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances.

Applicability: This authority is in effect through the end of the 2020 program year.

Implementation in Shelby County: Effective May 11, 2020 through June 30, 2021, reasonable notice and opportunity to comment will be provided via public notice and at least one virtual public hearing. Public notices will be published the *Memphis Flyer*, *La Prensa Latina* (a bilingual publication serving the Hispanic population), and in the *New Tri-State Defender* or the *Silver Star News* (publications serving the African American population). The County will also distribute public notices through the Department of Housing website and the City of Memphis main library listserv. The public notices will include date/time and access information on the virtual public hearing where citizens can provide comments and ask questions.

II. CITIZEN PARTICIPATION AND CONSOLIDATED PLAN GUIDELINES

A. The Citizen Participation Plan

1. Adoption and Amendments

SCDH is required to develop and follow a written citizen participation plan. This plan will be available to the public upon request at all times. The Citizen Participation Plan will be reviewed before the beginning of each program year (July 1 of each year) and amended as SCDH deems necessary. SCDH will provide citizens with an opportunity to comment on substantial amendments/revisions to the Citizen Participation Plan.

Prior to the adoption of a Consolidated Plan, Substantial Amendments, the Annual Action Plan, the Assessment of Fair Housing or Analysis of Impediments to Fair Housing as required by HUD, and CAPER, the County will make available to interested parties the draft documents for a comment period of no less than 30 days, 15 days for the CAPER, or as otherwise directed by HUD. The dates of the public comment periods will be identified in a notice regarding the availability of the documents, which will be published in the *Commercial Appeal*, and/or the *Daily News*, and/or the *Memphis Flyer*, in *La Prensa Latina* (a bilingual publication serving the Hispanic population), and in the *New Tri-State Defender* or the *Silver Star News* (publications serving the African American population). The County may also distribute information through other communication channels including email, websites, and local newspapers

SCDH will consider any comments by individuals or groups received in writing during the Consolidated Plan and AFH process and at the public hearings. A summary of the written and oral comments received during the comment period will be included in the Consolidated Plan, Substantial Amendments, Action Plan, Assessment of Fair Housing/Analysis of Impediments to Fair Housing, or CAPER, as applicable.

SCDH will provide residents, public agencies and other interested parties with reasonable and timely access to information and records related to the AFH/AI, Consolidated Plan and use of assistance under the programs covered in this Plan for the preceding five years. Records will be made accessible to persons with disabilities upon request.

2. Citizen Participation Components of the Consolidated Planning Process

a. SCDH encourages all citizens to participate in the planning and implementation of its programs and projects.

b. SCDH especially encourages participation by low- and moderate-income persons, particularly those living in locally-designated slum and blight areas, in areas where SCDH proposes to spend HUD funds, and in low- and moderate-income neighborhoods.

As required by HUD, at least 70 percent of housing and community development activities undertaken by SCDH will benefit low- and moderate-income residents of Shelby County, including low- very-low- and extremely low-income residents of Shelby County. Residents of these income levels in the Urban County are expressly encouraged to participate in the County's planning process and implementation of projects.

c. Members of ethnic and racial minorities, non-English speaking persons, and persons with disabilities are also encouraged to participate in the County's planning process and implementation of projects.

SCDH will ensure that all meetings held in connection with the planning process are fully accessible in order to prevent barriers as a result of physical abilities. If notified of a specific need for translation services in advance of a public meeting, SCDH will work to secure such services within the best of its ability.

All notices for public hearings, input, and assistance will include the statements regarding accommodations for those with special needs, the appropriate TTY number, contact information in Spanish for additional information, a nondiscrimination statement, and an equal opportunity/equal access provider statement.

d. SCDH encourages, in conjunction with consultation with the Millington Housing Authority, the participation of Millington public housing residents.

e. As an urban county entitlement, Shelby County is responsible for responding to the needs of persons who live in Shelby County outside of the City of Memphis, including residents of the six other incorporated municipalities in Shelby County as well as residents of unincorporated Shelby County. These six municipalities are Arlington, Bartlett, Collierville,

Germantown, Lakeland, and Millington. SCDH reports to a board consisting of representatives from these six municipalities. This board is known as the Urban County Consortium. The Consortium sets priorities and recommends projects to be included in the Consolidated Plan. These priorities and recommendations are often informed by citizen input at the municipal level and add another layer of citizen participation in the development of the Plan.

B. THE CONSOLIDATED PLAN AND AFH/AI

The Consolidated Plan requires SCDH to state its plan to pursue goals for community planning, development, and housing. The Plan serves several functions: (1) it is a planning document for the agency that is built upon a participatory process; (2) it serves as an application for federal funds under the CDBG and HOME programs; (3) it outlines the strategy to be followed by SCDH in implementing HUD assisted programs; (4) it establishes an action plan as a basis for assessing performance, (5) it is a resource document describing housing and community development needs in the community.

The Consolidated Plan does not incorporate the public housing Comprehensive Grant process although it does require coordination between SCDH and the Millington Housing Authority to ensure that the needs and resources of public housing are considered in SCDH's overall plan to assist low-income residents of the community.

1. Information SCDH Must Make Public

SCDH is required to make available to citizens, public agencies, and other interested parties the following information prior to adoption of the Consolidated Plan:

- a. The amount of federal assistance SCDH expects to receive during the coming program year (including both grant funds and program income).
- b. The range of activities that may be undertaken, including the estimated amount that will benefit person of low- and moderate-income.
- c. A plan to minimize the displacement of persons and to assist persons displaced by SCDH activities, specifying the types and levels of assistance SCDH will make available (or require others to make available) to persons displaced, even if no displacement is expected to occur. In the event that any acquisition and relocation must take place to carry out a program or activity, SCDH will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act, as amended, and implementing regulations at 49 CFR Part 24.
- d. The citizen participation plan must require that the grantee make available to the public, residents, public agencies, and other interested parties any HUD-provided data and other supplemental information the grantee plans to incorporate into its AFH at the start of the public participation process (or as soon as feasible after). SCDH may make HUD-provided data available to the public by cross-referencing to the data on HUD's website.

e. Published summaries of the AFH/AI and Consolidated Plan will describe the content and purpose of the AFH/AI or the consolidated plan, as applicable, and will include a list of locations where copies of the entire proposed document may be examined.

2. Public Hearings

SCDH will hold at least one public hearing during the development of the Consolidated Plan.

In accordance with HUD regulations, SCDH must hold at least two public hearings per year to obtain citizens' views and respond to proposals and questions. In order to obtain views on housing and community development needs, including priority non-housing community development needs, SCDH will hold at least one of its two annual public hearings before the Consolidated Plan is published for comment. The two public hearings will be conducted, at a minimum, during two different stages of the program year. The first public hearing will typically be held in January to address housing and community developments needs and the development of proposed projects and meets the requirement that at least one of its two annual public hearings is held before the proposed Plan is published for comment. The second public hearing will typically be held in September to review program performance.

All public hearings will be noticed at least two weeks prior to the hearing/meeting date and will be published in the *Commercial Appeal*, and/or the *Daily News*, and/or the *Memphis Flyer* and in *La Prensa Latina* (a bilingual publication serving the Hispanic population), and in the *New Tri-State Defender* or the *Silver Star News* (publications serving the African American population). The County may also distribute information through other communication channels including email, websites, and local newspapers.

Notices will include the date, time and location of the hearing/meeting, as well as a summary of the matter that will be discussed. A telephone number will be provided to allow interested parties to ask questions or to make requests for special accommodations.

Public hearings/meetings will be held at times and in locations that are convenient to potential and actual beneficiaries, with accommodations for persons with disabilities. When non-English speaking residents are expected to attend a public hearing or meeting, the County will supply a Spanish interpreter. If other non-English speaking residents are expected, the County will seek interpreter services from appropriate service organizations assisting such persons. The County will contract with an outside service provider should the need arise.

SCDH will hold at least one public hearing during both the development of the AFH and development of the consolidated plan and will provide a period, not less than 30 calendar days, to receive comments from residents of the community on the consolidated plan or the AFH. The required public hearings will occur before the proposed AFH and consolidated plan is published for comment.

3. Publication of Consolidated Plan Documents

All proposed documents included in the Consolidated Planning Process, i.e. Consolidated Plan, Proposed 5-Year Strategy, Substantial Amendments, Proposed Annual Action Plan,

Assessment of Fair Housing, and CAPER, will be available on the County's website, at the SCDH office located at 1075 Mullins Station Road between the hours of 8:00 a.m. until 4:30 p.m. Monday through Friday excluding County holidays, the Benjamin L. Hooks Central Public Library (main branch of the Memphis Public Library), the Bartlett Library Branch, the Arlington Library, the Collierville Library, the Germantown Library, and the Millington Library. Proposed documents will be available for review and comment for at least 30 days prior to submission to HUD except for the CAPER which will be available for 15 days.

The dates of the public comment periods will be identified in notices regarding the availability of the documents, which will be published in the *Commercial Appeal*, and/or the *Daily News*, and/or the *Memphis Flyer*, in *La Prensa Latina* (a bilingual publication serving the Hispanic population), and in the *New Tri-State Defender* or the *Silver Star News* (publications serving the African American population). The County may also distribute information through other communication channels including email, websites, and local newspapers.

The County will consider any comments by individuals or groups received in writing during the Consolidated Plan and AFH process and at the public hearings. A summary of the written and oral comments received during the comment period will be included in the Consolidated Plan, Substantial Amendments, Action Plan, Assessment of Fair Housing, or CAPER, as applicable.

4. Citizen Comments and Complaints

SCDH will provide a timely, substantive written response to every written citizen complaint related to the Consolidated Plan, Substantial Amendments, the Action Plan, the Assessment of Fair Housing or CAPER, where practicable, within 15 working days of receipt. A summary of any written complaints received during any comment period, including any views not accepted, will be included in the Consolidated Plan, Substantial Amendments, Action Plan, Assessment of Fair Housing or CAPER as applicable.

Written comments and complaints should be addressed to Administrator, Shelby County Department of Housing, 1075 Mullins Station Road, Memphis, TN 38134.

For any citizen unable to provide a written complaint, SCDH will take steps to record and respond to the citizen's verbal complaint.

5. Substantial Amendments to the Consolidated Plan

SCDH defines a substantial amendment to the Consolidated Plan as a change resulting from one of the following activities:

- a. A proposal to carry out a new eligible activity not described in the Action Plan or 5-Year Strategy;
- b. A proposal to cancel any previously planned activity;

- c. A 20 percent increase in a project budget when said budget allocation is greater than \$100,000; the funds for the increase reduces funding for another planned project, and the funds from the transferred project substantially changes the purpose, scope, location or beneficiaries of an activity.

SCDH does not deem the following activity to constitute a substantial amendment:

- a. The increase and/or decrease in the funding level of one or more projects through the movement of funds between planned projects in the same census tract or from unallocated funds; provided that the transfer of funds between projects does not result in either the cancellation of a project nor does the transfer of funds result in alteration of a project or projects in a manner that conflicts with the project outlined in the Consolidated Plan.

Amendments to the Citizen Participation Plan will be made when changes in federal regulations require it, or when changes in the public notification, public hearing or Consolidated Plan constituency group process are made.

Substantial amendments to the Consolidated Plan must be made public through a public notice published in the *Commercial Appeal*, and/or the *Daily News*, and/or the *Memphis Flyer*, and *La Prensa Latina*, and in the *New Tri-State Defender* or the *Silver Star News* and/or other newspapers serving the affected areas on SCDH's jurisdiction to include a summary of the proposed amendment, a description of the eligible activities affected, the project location, if applicable, and the amount of funds to be transferred. The notice must indicate a 30 day public comment period. Amendments must go through the 30 day public comment period and be submitted to HUD before any program changes embodied in the amendment are made. The County must consider any comments regarding such amendments which are received in writing or at a public hearing, if any, and a summary of comments not accepted and the reasons shall be attached to the substantial amendment to the Consolidated Plan.

6. Public Review of the Citizen Participation Plan

This Citizen Participation Plan was made available for public review and comment prior to adoption, in accordance with the Consolidated Plan public notice, public hearing/meeting and public comment procedures described herein. Any substantial amendments to this Citizen Participation Plan will be made available for public review and comment through the same process prior to adoption. This Citizen Participation Plan will be available on the County's website. Copies will also be made available to those that do not have internet access free of charge and will be made available in a format accessible to persons with disabilities, upon request. Interested residents should contact SCDH at (901) 222-7600 to request a copy of the Citizen Participation Plan.

7. Performance Reports

SCDH must provide citizens with reasonable opportunity to comment on its performance reports and will publish a performance summary annually to include the amount and use of

CDBG and HOME funds. This summary will be published in the *Commercial Appeal*, and/or the *Daily News*, and/or the *Memphis Flyer*, in *La Prensa Latina*, and in *The New Tri-State Defender* or the *Silver Star News*/or other newspapers serving the entitlement area. Full copies of the CAPER will be available to the public in accordance with II. B. 3. of this Citizen Participation Plan.

SCDH will accept comments on the CAPER for a period of fifteen days prior to submitting the report to HUD. SCDH will consider any comments or views from citizens received either orally during a public hearing or in writing.

8. Affirmatively Furthering Fair Housing

SCDH will consult with community-based and regionally-based organizations representing protected class members, and organizations that enforce fair housing laws, including participants in the:

- Fair Housing Assistance Program (FHAP);
- Fair housing organizations;
- Nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP); and
- Other public and private fair housing service agencies, to the extent that such entities operate within the grantee's area.

This consultation will help provide a better basis for the AFH, Shelby County's certification to affirmatively further fair housing, and other portions of the consolidated plan concerning affirmatively furthering fair housing. This consultation will occur with any organizations SCDH can identify that have relevant knowledge or data to inform the AFH.

To the greatest extent practicable, the organizations involved in the consultations will be sufficiently independent and representative to provide meaningful feedback on the AFH, the consolidated plan, and their implementation. At a minimum, SCDH will consult with above referenced organizations in the development of both the AFH and the consolidated plan. Consultation on the consolidated plan shall specifically seek input into how the goals identified in an accepted AFH inform the priorities and objectives of the consolidated plan.

III. OTHER GENERAL REQUIREMENTS

A. Availability to the Public

The Consolidated Plan as adopted including substantial amendments, the Citizen Participation Plan and substantial amendments to it, the AFH/AI, and performance reports will be made available to the public and will be posted on the SCDH website. These documents can be reviewed at the SCDH office located at 1075 Mullins Station Road between the hours of 8:00 a.m. until 4:30 p.m. Monday through Friday excluding County holidays. These materials will be made available in a form accessible to persons with disabilities upon request. With adequate notice, SCDH will make every attempt to provide these documents and/or their contents to persons with disabilities who are unable to leave their homes.

B. Access to Records

The County will provide residents, public agencies and other interested parties with reasonable and timely access to information and records related to the AFH/AI, Consolidated Plan and use of assistance under the programs covered in this Plan for the preceding five years.

C. Technical Assistance

Shelby County, in particular the Department of Housing, will provide technical assistance to any persons or groups interested in commenting on the Consolidated Plan or the AFH/AI as well as those developing CDBG or HOME funding proposals. Assistance will primarily consist of directing these groups to, or helping them make contact with, public and/or private agencies capable of offering physical and health and safety improvements, and not to provide operating funds to nonprofits. Therefore, SCDH's technical assistance will not likely include funding.

VI. CALENDAR OF THE PROGRAM PLANNING YEAR

The list below serves as a general guide to the planning process throughout each program year. Actual activities are subject to change subject to factors including, but not limited to, HUD announcement of formula allocations, HUD notices or guidance impacting the planning process at any time, and SCDH staffing and capacity.

November-December	Begin annual planning process in coordination with the Urban County Consortium
January-February	Hold the first of two required annual public hearings to solicit input on community development needs to be addressed in the plan
January-March	Prepare draft of proposed plan
April	Make proposed plan available for public review for at least thirty days and hold public hearing to present proposed plan

May Incorporate public comments into final plan and submit to HUD by May 15 for review and approval

July Begin Program Year/execute grant agreements for entitlement funds

Begin drafting CAPER for previous Program Year

August Complete proposed CAPER

September Make proposed CAPER available for public review and comment for at least fifteen days and hold the second of two required annual public hearings to present proposed CAPER

Submit CAPER to HUD by September 30