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Citizen Participation Plan

Community Development Bloc Grant
Disaster Recovery (CDBG-DR)



Table of Contents

Change Log	1
Statement of Purpose	2
Introduction	2
Maintain a Comprehensive Website	3
CDBG-DR Website Contents	3
CDBG-DR Website Usability and Accessibility	4
CDBG-DR Website Frequency of Updates	4
Responsibility	5
Action Plan Comments	5
Citizen Participation Plan Comments	6
Public Notice	6
Public Hearings	7
Submission of Action Plan	7
HUD-Approved Action Plan	7
Individuals with Disabilities	8
Anti-Displacement	8
Access to Records	9
Citizen Advisory Group	9
Citizen Complaints	10
Response to Appeals	10
Performance Reports	10
Action Plan Amendments	11
Use of Plan	11
Citizen Participation Plan Contact	12

Change Log

Version	Date	Description
1	6/3/2025	Draft CDBG-DR Citizen Participation Plan

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Statement of Purpose

The County of Manatee ("County") is a recipient of Community Development Block Grant Disaster Recovery (CDBG-DR) to support long-term recovery efforts following eligible disasters. This funding is being provided through the U.S. Department of Housing and Urban Development (HUD).

The County recognizes that citizen participation is a critical component of disaster recovery. To better guide the County's outreach in gaining citizen input, the County has developed a Citizen Participation Plan (CPP) specific to the County's CDBG-DR programs. The CPP is designed to create opportunities for citizens to participate in the planning, implementation, and assessment of CDBG-DR recovery programs.

CDBG-DR requires that grantees adopt a citizen participation plan and *Federal Register* Notices outline the specific citizen participation requirements applicable to CDBG-DR funding. The County has developed this CPP consistent with the requirements in HUD's January 8, 2025 Federal Register Notice ([90 FR 1754](#)) (Updated March 19, 2025) ("Revised Universal Notice"), and will implement updates or alternative plans as needed to ensure continued alignment with federal guidance.

Introduction

In accordance with section I.C.2. of the Revised Universal Notice, the County has prepared a Plan to govern public participation in the planning, implementation, and assessment of the County's CDBG-DR recovery programs. The County is responsible for administering the CDBG-DR funds and this CPP. Pursuant to I.C.1.c. of the Revised Universal Notice, the County will use CDBG-DR funds in a manner that complies with applicable statutes including:

- Section 109 of the HCD Act (42 U.S.C. 5309)
- Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.)
- Title VII of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.)
- Title VIII of the Civil Rights Act of 1968 (The Fair Housing Act) (42 U.S.C. 3601-19)
- Sections 504 and 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794)
- The Americans with Disabilities Act of 1990 (42 U.S.C. 12131 et seq.)
- Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) (Public Law 104-193)

The goal of CDBG-DR funding is to promote the recovery of disaster impacted communities by addressing unmet needs as they pertain to restoration of housing and infrastructure, economic revitalization, and mitigation, with a focus on benefiting low- and moderate-income (LMI) persons. Citizen participation will be encouraged throughout the recovery process by providing notice to residents and local organizations through various media methods.

The CPP sets forth the policies and procedures to be used to encourage the participation of all County residents. To fulfill public participation requirements for CDBG-DR grants, the County is committed to the processes outlined herein for citizen participation.

Maintain a Comprehensive Website

In accordance with requirements established by the Revised Universal Notice, the County will implement, develop, and maintain a comprehensive website that provides information on all disaster recovery activities related to CDBG-DR. The website will comply with the requirements outlined in the Revised Universal Notice which can be accessed at www.mymanatee.org/lastingmanatee.

The CDBG-DR website will be updated quarterly, at a minimum, in accordance with the following procedures and standards. The webpage will feature links to details about grant fund usage and management, action plans and amendments, performance reports, citizen participation notices, and program information for activities specified in the Action Plan. Additionally, it will include information on current procurement policies and most contracts related to the use of the funds.

CDBG-DR Website Contents

To ensure compliance with the Revised Universal Notice, the County will maintain a comprehensive website detailing the uses of CDBG-DR funds. The County's CDBG-DR Action Plan will be posted to the website allowing residents, impacted local governments, and other interested parties, reasonable opportunity to review the plan and any substantial amendments and to see how grant funds are utilized and managed. This will provide transparency regarding the administration of all CDBG-DR funds.

The website offers residents, affected local government, and other interested parties the chance to review the following documents:

- Administrative Action Plan;

- Action Plan for Disaster Recovery (including all amendments) and all vital documents necessary to understand the program;
- Each performance report (as created using the DRGR system) with all personally identifiable information omitted;
- Citizen Participation Plan;
- Program-specific policies and procedures (compliant with the timelines identified III.A.1. of the Universal Notice);
- Procurement policies and procedures;
- Procedures for ensuring timely expenditure of funds (including a projection of expenditures and outcomes);
- All executed contracts (except for those below the micro-purchase threshold) that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including, but not limited to, subrecipients' contracts); and
- A summary, including the description and status, of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.);

CDBG-DR Website Usability and Accessibility

The County's CDBG-DR website is designed to ensure ease of navigation and accessibility for all users. It follows best practices to provide a clear and user-friendly structure that meets accessibility standards to accommodate individuals with disabilities.

All materials are made available in accessible formats as required by 29 U.S.C. 794. The website and associated documents will also be made available to the public in compliance with 42 U.S.C. 12131B65 and 42 U.S.C. 2000d.

The County's website accessibility policy is outlined at:

https://www-dev.mymanatee.org/departments/property_management/a_d_a_accessibility.

CDBG-DR Website Frequency of Updates

The CDBG-DR webpage will be updated quarterly, at a minimum, by the Government Relations Department, and will follow the requirements outlined in the Revised Universal Notice.

Responsibility

The County's Government Relations Department is responsible for coordinating updates to the CDBG-DR website. For inquiries, email cdbg.dr@mymanatee.org.

Action Plan Comments

For all HUD disaster recovery grants, the Grantee must create and maintain an Action Plan that outlines the strategy for utilizing funds. In accordance with the Revised Universal Notice, the County encourages and invites citizens to participate in the development of its Action Plan and Substantial Action Plan Amendments. The County's Action Plan and Substantial Action Plan Amendments will be made available for a thirty (30) day public comment period.

Hard copies of the Action Plan and any subsequent Action Plan Amendments will be made available by the Government Relations Department upon request.

Comments on the Action Plan, Substantial Action Plan Amendments, and other comments or citizen complaints may be submitted as follows:

- In person at public hearings
- Via email at: cdbg.dr@mymanatee.org
- Online at: www.mymanatee.org/lastingmanatee
- Via telephone at: (941) 742-4787
- Via mail at:

Manatee County, Government Relations
Attn: Lasting Manatee
1112 Manatee Avenue West
Bradenton, FL 34205

At the conclusion of the public comment period on either the Action Plan or Substantial Amendments, all citizen feedback is reviewed and responded to by the County, then incorporated into the Action Plan or Amendment. A revised Action Plan that includes the public comments and responses is then posted to the County's CDBG-DR website: www.mymanatee.org/lastingmanatee.

Citizen Participation Plan Comments

Comments will be received on the CPP and substantial amendments to the CPP for at least seven (7) days. The County will provide citizens with a reasonable opportunity to comment on both the original CPP and on any substantial amendment to the CPP.

- A non-substantial amendment addressing minor administrative changes to the CPP will be documented in the document version history, presented to the HUD grant manager, and automatically updated on the website: www.mymanatee.org/lastingmanatee.
- A substantial amendment to the CPP is defined as any material change. A material change is a change in circumstances within the County that affects the information on which the CPP is based to the extent that the intent and goals of the CPP no longer reflect actual circumstances. Examples include changes to the number of days the CPP is made available for public comment, changes to the definition of substantial or non-substantial amendments for either the CPP or the Action Plan; changes in the public notice or public hearing requirements; changes in accommodations available for persons with disabilities or changes in accordance with 42 U.S.C. 2000d; significant demographic changes within the County; new significant factors that changes opportunity for access to programs and information in the jurisdiction; or upon HUD's written notification specifying a material change that requires the revision.

Public Notice

Prior to submitting an Action Plan or Substantial Amendment, the County will publish the Action Plan or Substantial Amendment on the County's website at www.mymanatee.org/lastingmanatee. The date of publication will be the beginning of a thirty (30)-day public comment period.

Pursuant to the Revised Universal Notice, the County must conduct at least two (2) public hearings on its draft Action Plan. Prior to any scheduled public hearings, a public notice will be published on the County's website at www.mymanatee.org/lastingmanatee, and shall include a summary of the proposed Action Plan or Substantial Amendment consistent with all requirements governing accessibility and availability to the public. All in-person hearings must be held within the HUD-identified MID area (i.e., Manatee County) and in facilities that are physically accessible to persons with disabilities.

The County may employ additional methods to notify the public about CDBG-DR related action including, but not limited to, the following:

- Neighborhood associations, community-based organizations, agencies, and churches;
- Electronic mailings, press releases, statements by public officials, public service announcements;
- Local news media outlets;
- Informational flyers advertising the program provided as inserts in tax bills;
- Social media such as Facebook, Twitter, Instagram, when appropriate; and
- Outreach activities may also involve door-to-door canvassing.

Public Hearings

In the event the County is closed to the public, meetings will be rescheduled and/or virtual public meetings and hearings may convene instead. Check www.mymanatee.org/lastingmanatee for notices of all public meetings, including virtual hearings. Virtual hearings will be used in lieu of in-person hearings if national or local health authorities recommend social distancing and limit public gatherings for public health reasons. When conducting a virtual hearing, the County must allow questions in real time, with answers coming directly from County representatives to all attendees.

Submission of Action Plan

Submission of CDBG-DR Action Plans and Substantial Amendments shall require approval by the County's Board of County Commissioners (BCC). Once the Action Plan or any Substantial Amendments to the Action Plan have been approved by the BCC and submitted to HUD, a forty-five (45)-day HUD review period will commence. Upon submission, all certifications of compliance will be included.

HUD-Approved Action Plan

Upon HUD approval, the Action Plan will be posted to the County's CDBG-DR website at www.mymanatee.org/lastingmanatee.

Individuals with Disabilities

The County's programs will be accessible to all individuals with disabilities and will operate without discriminating or limiting access to services and benefits. To ensure compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA), the County will:

- Ensure that all facilities where clients interact face-to-face with program staff are fully accessible and usable by individuals with disabilities.
- Assist program staff in providing both written and verbal communication to program applicants, regardless of their disability, including sign language, braille, interpreters, etc.
- Help program staff conduct home visits with applicants who are homebound.
- Ensure that reasonable accommodation modifications to an applicant's home are included in the program scope of work, as applicable.
- Appropriately address any identified hearing, vision, or mobility limitations of a program applicant and/or their household members, in compliance with Section 504 and the ADA.
- Collaborate with a designee of an applicant with disabilities, such as someone with power of attorney, or a non-profit organization representing the applicant, as needed.

The County further complies with Section 508 requirements by ensuring accessibility to electronic and information technology for individuals with disabilities. Online materials will also be made accessible for the visually impaired. Printed copies of Action Plans can be made available in large print format upon request.

Anyone who requires a reasonable accommodation, such as an auxiliary aid or service for effective communication, to participate in the County's programs, services, or activities should contact Carmine DeMilio, ADA Compliance Coordinator, at (941) 748-4501, ext. 6016 or carmine.demilio@mymanatee.org, at least three (3) business days prior to any applicable scheduled meeting. If you are deaf/hard of hearing and require the services of an interpreter, please contact the Florida Relay Service at 711.

Anti-Displacement

The County will follow applicable requirements, as amended by the Revised Universal Notice, relating to the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA),

section 104(d) of the Housing and Community Development Act, its Local Relocation and Anti- Displacement Policy, and any other required state and Federal regulations. For CDBG-DR purposes, the County will maintain relocation and anti-displacement policies to leverage (or conform with) waivers and alternative requirements as provided in the Revised Universal Notice.

Access to Records

The County will provide residents of the community, public agencies, and other interested parties with reasonable and timely access to information and records concerning documents related to the use of the County's CDBG-DR funds.

All correspondence, records, and minutes of BCC public hearings will be retained by the Clerk of the Circuit Court. All input received through, or in association with, community meetings and workshops will be retained by the Government Relations Department. Any pertinent information such as written proposals from a citizens group, etc., will be presented to Government Relations Department staff for review and consideration. If assistance in reading or obtaining program records is needed, the Government Relations Department should be contacted at (941) 748-4501 or interested parties can access records at the Government Relations Department, 1112 Manatee Avenue West, Bradenton, Florida, 34205.

Interested parties may also access many of the program documents at the County's CDBG-DR website, www.mymanatee.org/lastingmanatee.

Interested parties may submit a public records request by one of the following methods:

- [Submit Request Online](#)
- Email: Send a request to public.records@mymanatee.org
- Mail: Mail a request to:
 - Manatee County Custodian of Record, 1112 Manatee Ave W, 8th Floor, Bradenton, FL 34205
- Call: (941) 748-4501 ext. 6888
- In-Person: Visit the Custodian of Records office at 1112 Manatee Ave W, 8th Floor, Bradenton, FL 34205 during regular business hours of 8:00AM-4:00PM.

Citizen Advisory Group

Grantees are encouraged to gather feedback and recommendations on key program decisions from its citizen advisory group at least annually. The County may engage citizen advisory groups to gather feedback on recovery efforts.

Citizen Complaints

Complaints are statements received from citizens regarding issues related to the County's disaster recovery programs, Action Plans, Substantial Action Plan Amendments, quarterly performance reports, or concerns about the unsatisfactory or unacceptable behavior of a County representative executing a disaster recovery program. Complaints will be directed to the appropriate County management staff for investigation and will be addressed with a response within fifteen (15) working days, whenever practicable. Citizen complaints can be submitted to:

Manatee County, Government Relations
Attn: Lasting Manatee
1112 Manatee Avenue West
Bradenton, FL 34205
Telephone: (941) 742-4787

All subrecipients will be required to develop complaint procedures that align with the requirements set by the County.

Response to Appeals

The County will implement a standardized appeals process to address written appeals related to a CDBG-DR program and will require subrecipients to adopt a similar process. In programs that directly serve individuals, applicants or tenants may appeal decisions affecting their eligibility and/or assistance, in accordance with program policies. However, it is important to note that the County does not have the authority to grant an appeal of a statutory or HUD-specified CDBG-DR requirement.

Performance Reports

The County will offer citizens a fifteen (15)-day period to provide feedback on performance reports before they are submitted to HUD. Additional time may be required for responses during certain periods, such as holidays, active storms, or recovery efforts. All comments or views from citizens, whether submitted in writing or expressed orally at public hearings during the preparation of the performance report, will be taken into account. A summary of these comments or views will be attached to the performance report.

Action Plan Amendments

The County will define what constitutes a Substantial Amendment in the Action Plan which must be approved by HUD.

Pursuant to I.C.1.f. of the Revised Universal Notice, a substantial amendment to the CDBG-DR Action Plan is often defined as follows:

- A change in program benefit or eligibility criteria (including the expansion of eligible beneficiaries (e.g., establishing a new grantee-identified MID area);
- The addition or deletion of an activity;
- A proposed reduction in the overall benefit requirement (as described in section III.B.1. of the Revised Universal Notice);
- The allocation or reallocation of a reasonable monetary threshold specified by the grantee in its Action Plan; and
- An update to the submitted initial Action Plan if the original submission was incomplete as allowed under section I.C.1.d. paragraph 7 and section I.C.1.e. of the Universal Notice.

For amendments considered non-substantial, the County notifies HUD, but public comment is not required. Every amendment, substantial or not, will be numbered sequentially and posted on the website.

Use of Plan

The County will follow this Plan in the development of the Action Plan and Substantial Action Plan Amendments.

For more information regarding the Action Plan and its Amendments or to submit your comments, inquiries and complaints concerning the Action Plan and its Amendments can be conveyed by contacting the County staff at:

Manatee County, Government Relations
Attn: Lasting Manatee
1112 Manatee Avenue West
Bradenton, FL 34205
Telephone: (941) 742-4787

Complaints and related comments on the programs may also be offered at the public hearings. Written complaints may also be made to the Jacksonville Office of the U.S. Department of Housing and Urban Development (HUD) at the following address:

U.S. Department of Housing and Urban Development
Community Planning and Development Division Charles Bennett Federal
Building 400 West Bay Street, Suite 1015
Jacksonville, FL 32202
Telephone: 904-232-1777
Fax: 904-232-3617

Citizen Participation Plan Contact

For all requests regarding the County's CDBG-DR citizen participation efforts, please contact cdbg.dr@mymanatee.org.