



**Interoffice Memorandum**

October 31, 2023

TO: Mayor Jerry L. Demings  
-AND-  
County Commissioners

FROM: Andres Salcedo, P.E., Acting Director *Andres*  
Planning, Environmental, and Development Services Department

**CONTACT PERSON: Mitchell Glasser, Manager  
Housing and Community Development Division  
407-836-5190**

SUBJECT: November 28, 2023 – Consent Item  
Orange County Citizen Participation Plan Update

Orange County was awarded Community Development Block Grant – Disaster Recovery (CDBG-DR) funds to address long-term recovery and mitigation needs associated with Hurricane Ian. CDBG-DR is a flexible set of funds to carry out a wide range of activities related to disaster relief, restoration of infrastructure and housing, economic revitalization, and mitigation of future risks. The CDBG-DR requires the adoption of citizen participation standards to ensure all citizens of Orange County are provided an opportunity to participate in the planning, implementation, and assessment of the CDBG-DR recovery program.

Citizen participation requirements for federal programs administered by the Housing and Community Development Division are outlined in the Citizen Participation Plan, which was updated by the Board on August 9, 2022. The proposed update includes requirements specifically implemented for the County's CDBG-DR program, as well as minor changes and clarifications. The CDBG-DR related updates cover the CDBG-DR action planning process, stakeholder consultation requirements, publication of a draft CDBG-DR Action Plan and public comments, public hearing process, program website requirements, and amendments to the CDBG-DR Action Plan.

**ACTION REQUESTED: Approval of Orange County Citizen Participation Plan to include the requirements associated with the Community Development Block Grant - Disaster Recovery program. All Districts**

AS:MG  
Attachments

APPROVED BY ORANGE  
COUNTY BOARD OF COUNTY  
COMMISSIONERS

BCC Mtg. Date: November 28, 2023



# ORANGE COUNTY CITIZEN PARTICIPATION PLAN

*updated November 2023*



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## I. INTRODUCTION

Orange County's Citizen Participation Plan (CPP) establishes the procedures and standards for citizen participation that Orange County must follow to be in compliance with the U.S. Department of Housing and Urban Development's rule 24 CFR 91.105. All Orange County citizens, in particular low- and moderate-income persons and those living in areas eligible for funding under the Orange County Consolidated Plan, are encouraged to participate in the planning, implementation and assessment of the federally-funded housing and community development programs.

These programs, administered by the County's Housing and Community Development Division are intended to develop viable communities with decent housing and suitable living environments, and to expand economic opportunities, particularly for low- and moderate-income persons within the unincorporated County area and in the participating municipalities. The programs are implemented through a number of activities that are identified and selected annually. To conduct desired activities, Orange County seeks federal funding from the U.S. Department of Housing and Urban Development (HUD), primarily through the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG) programs.

Orange County recognizes the need for persons or groups affected by, or involved with community development projects under these programs to be given the opportunity to provide relevant and productive input to those tasked with program implementation and administration. To accomplish this goal, the Orange County Citizen Participation Plan is designed to gather input from persons with low- and moderate-incomes, persons living in areas eligible for funding, where funds are being used or are proposed to be used, and from residents of primarily low- and moderate-income neighborhoods, as defined by HUD.

This CPP also governs citizen participation processes associated with Orange County's Community Development Block Grant-Disaster Recovery (CDBG-DR) grant, which supports long-term recovery efforts following Hurricane Ian. In addition to people affected by natural disasters and low- and moderate-income residents, the input from persons who are experiencing homelessness, members of minority groups, persons with limited English proficiency (LEP), persons with disabilities, and residents of public housing (to include the Orlando and Winter Park Housing Authorities) is important to the County's planning. This input is obtained by publicly soliciting individual comments and by contacting groups and agencies that represent and/or serve these populations. Additionally, Orange County welcomes input from local community partners, faith-based organizations, local Continuum of Care (CoC FL-507), currently known as the Central Florida Commission on Homelessness, with Homeless Services Network of Central Florida, Inc. (HSN) being its lead agency, and from those agencies that provide assisted housing, health services, and various public services. These partners can provide valuable insight on community needs and improvements.

To ensure citizens' participation in all stages of the planning process, the County will host public meetings, virtually and in-person at a variety of locations, and provide timely notification and appropriate information concerning the conduct and purpose of these meetings to allow full public participation.

## II. CONSULTATION AND TECHNICAL ASSISTANCE

Orange County actively promotes neighborhood/community organizations and engages the community by conducting or participating in neighborhood meetings and maintaining ongoing contact with neighborhood organization representatives, especially in low- and moderate-income areas in need of community development assistance. These neighborhood meetings give County representatives an opportunity to share information about the Citizen Participation Plan process. Citizens and community leaders can interact with and share concerns or recommendations with County representatives. Interested parties/groups may review old or new program issues or activities, and may solicit input on projects being considered for their area under any programs covered by the Consolidated Plan (a five-year strategic plan for the use of federal dollars), prior to submitting a proposal, through their organization, to the Housing and Community Development Division.

The County's Housing and Community Development Division regularly partners with Neighborhood Services and Planning Divisions to attend neighborhood and community meetings. Meetings organized by the Planning Division are primarily focused around land use changes and land development decisions. Those meetings are advertised on the County Calendar, which can be accessed by visiting the County's website at [www.ocfl.net](http://www.ocfl.net). The Neighborhood Services Division participates in neighborhood meetings throughout Orange County, to include meetings of established Safe Neighborhood Groups (South Apopka, Tildenville, Azalea Park, Pine Hills, Pine Castle, South Goldenrod, South Orange Blossom Trail, Orlo Vista and Lee Road), meetings of the Pine Hills Neighborhood Improvement District Council, and meetings of various neighborhood organizations (Tangelo Park, North Lake Mann, People of Lockhart, Normandy Shores, etc.). Please contact Neighborhood Services Division (407-836-5621) to obtain a schedule of these meetings and additional details.

Additionally, the Housing and Community Development Division staff will provide guidance in the interpretation of relevant federal regulations, strategies, and objectives of the Consolidated Plan Annual Action Plan, and CDBG-DR Action Plan, and offer referrals to appropriate agencies including HUD, if necessary. Orange County staff will provide technical assistance, to the greatest extent feasible, to all applicants or potential applicants and their constituents. Assistance may be in the form of one-on-one technical assistance to community leaders, or organizations and agencies that represent and/or assist low- to moderate-income individuals, those with limited English proficiency, minorities, and persons with disabilities, in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan and/or CDBG-DR Action Plan. Staff may also attend meetings to provide needed technical assistance and to respond to community questions and/or concerns, or both. Assistance with proposals is not a guarantee of funding.

Pre-award technical assistance sessions for annual Request for Applications (RFA) proposals are generally held in the beginning of March of each year, either virtually or in person, at the Orange County Chambers (201 S. Rosalind Ave., Orlando, FL 32801). The exact dates and times are advertised in local newspapers in February, and the information is also emailed to the agencies and persons on the Division's distribution/contact list. To add their name(s) to the distribution list, agency representatives or interested individuals should send an email to [housing@ocfl.net](mailto:housing@ocfl.net). One-on-one technical assistance can also be requested via email (same email address) and provided upon availability of staff time and before an official Request for Applications (RFA) is

announced. In accordance with the County's internal policy, staff cannot meet with organizations during the RFA process to discuss individual proposals. After an RFA is issued, all questions related to projects and program proposals will be addressed to the section's staff by email only.

All funding recommendations are heard and approved by the Community Development Advisory Board (CDAB) prior to being scheduled to be heard by the Board of County Commissioners. The CDAB serves as a liaison between the Housing and Community Development Division and County residents. The Board represents both community-wide and neighborhood interests. Orange County's six District Commissioners each appoint a CDAB member for a particular district, and one CDAB member is appointed by the Mayor as an at-large representative. The Board convenes regularly (generally, 3<sup>rd</sup> Wednesday of each month), and members of the Board are also encouraged to attend neighborhood organization meetings in the district they represent. The CDAB meetings are open to the public, and agency representatives and interested parties are welcome to attend those meetings. Additional information about CDAB meetings, to include meeting dates, locations, times, agendas, and meeting minutes, can be found on the Orange County website ([www.ocfl.net](http://www.ocfl.net)).

### **III. CONSOLIDATED PLANNING PROCESS**

#### **a. 5-Year Planning Process**

Every 5 years, the County will develop a new Consolidated Plan. It is a five-year strategic plan prepared as required by 24 CFR Part 91 to continue to receive entitlement funds from HUD. It is the planning document that identifies needs and goals for community planning and development programs, and housing programs, during the designated five-year period. The plan is submitted to HUD on or before August 15 prior to the start of the first year of the new five-year period. It allows the County to apply for funding under the CDBG, HOME and ESG programs.

The County will hold at least one public hearing before developing the Consolidated Plan to:

- Provide citizens, public agencies and interested parties with a forum for input on housing and community development needs and priorities as part of the preparation of the Plan;
- Discuss the amount of funding the County anticipates receiving from HUD for CDBG, ESG and HOME programs, and related program income, and the estimated amount of funding under these programs that will benefit persons of low and moderate income;
- Examine the range of activities that may be implemented;
- Give assurances of plans to minimize displacement of persons, assist any persons displaced, and specify the types and levels of assistance the County will make available (or require others to make available) to persons displaced, (even if no displacement is expected to occur) in keeping with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended; and
- Advise when and how the County will make this information available.

When developing the Consolidated Plan, the County will provide opportunity for citizen input on needs and priorities by such means as focus group sessions, a public survey at community locations and/or via a website, and/or a request for input and comments on the County's website, participation in community meetings, and by other means as feasible and appropriate.

Prior to adopting the Consolidated Plan, Orange County will make available to citizens, public agencies, and other interested parties' information which includes the amount of assistance the County expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income.

Draft Document and Public Comments: Orange County will ensure that citizens, public agencies, and other interested parties are provided with a reasonable opportunity to examine the contents of the proposed Consolidated Plan and to submit comments during the public comment period. A public notice of anticipated funding and proposed activities, as well as identified community needs and funding priorities, will be published in the local newspaper of general circulation. The notice will include dates for a public comment period, a date and time of a public hearing, and various ways to access the draft document or an executive summary of the document. A copy of the notice will be provided to community partners, particularly those in or serving low and moderate-income areas of the County, faith-based organizations, business and other agencies/organizations and associations, as well as agencies serving persons with disabilities and those with limited English proficiency, as appropriate.

The published draft document, or its executive summary, will describe the content and purpose of the Consolidated Plan, funding anticipated, proposed activities, and locations where copies of the entire proposed Consolidated Plan may be examined by the public. A public review and comment period of not less than thirty (30) days will be established for the receipt of comments from citizens on the proposed Consolidated Plan. This period will be specified in the public notice at the time the summary of the plan is published.

Availability for Review: A copy of the proposed plan will be available for review at the Orange County Public Library, and at the Orange County Housing and Community Development Office, including its Planning and Development, Housing Development and Section 8 offices. The proposed Consolidated Plan will be posted on the County's website, and, to the extent possible, at such public places and other locations throughout the county that will facilitate examination by the general public. Upon request, the County will also make a reasonable number of copies of the Plan available to citizens and groups that request it, including copies to persons who are homebound. Locations and addresses of locations where the plan will be available are as follows:

Housing and Community Development Division Webpage  
<http://www.orangecountyfl.net/NeighborsHousing/CommunityDevelopment.aspx>

Orange County Housing and Community Development Division  
525 E. South St.  
Orlando, FL 32801

Orange County Public  
Library 101 E. Central Blvd.  
Orlando, FL 32801

Orange County Community Centers  
[Various - Located in or serving current Target Areas and other Low/Mod Income Areas]

b. Annual Planning Process

Every year of the 5-Year planning period, the County will develop an Annual Action Plan. An annual action plan is prepared for each year of the five-year Consolidated Plan, and it specifies the amount of funding the County anticipates receiving from HUD, and related program income, under the CDBG, HOME and ESG programs. It describes the activities/projects to be undertaken to address the needs and priorities identified in the Consolidated Plan. An Annual Action Plan is submitted to HUD on or before August 15 of each year and serves as the annual application for funding for the grant year that begins October 1<sup>st</sup> and ends September 30<sup>th</sup>.

The annual planning process will largely follow the method established for the Consolidated Plan, and it will include an initial public input, issuance of the Request for Applications/Notice of Funding Availability, selection of projects and activities to be funded to meet the goals and objectives of the 5-year plan, drafting of the document, establishment of the public comment period, making the document available for review and comments, and public hearings.

c. Amendments to Consolidated Plan and Annual Action Plan

Every amendment to the Consolidated Plan and/or Annual Action Plan must be defined as either a substantial or a minor amendment, based on the criteria listed below.

Substantial amendments to the Consolidated Plan must conform to 24 CFR 91.505. Orange County will consider the following changes to be substantial amendments to the Consolidated Plan/Annual Action Plan, and subject to the citizen participation process, in accordance with its Citizen Participation Plan and 24 CFR 91.505. A substantial change is defined as one of the following occurrences:

- A change that adds a new priority;
- A change that adds a new activity;
- A change that cancels an activity that involves more than 25% of the fiscal year's funding allocation;
- A change in the project location to one beyond the original census tract and block group;
- A change in the scope of an activity as it relates to beneficiaries, basic eligibility, or changes in purpose/stated objectives of an activity.

When processing a substantial amendment, a notice concerning the availability of the proposed substantial amendment will be published in a newspaper of general circulation, and will establish a thirty (30) day public review and comment period. The public notice will encourage all interested parties to participate and solicit their comments and input on the proposed substantial amendment. Upon request, the County will also make copies of the proposed substantial amendment available to citizens and groups. All comments received in writing during the established public comment period will be considered in preparing the final substantial amendment. A summary of any accepted comments or views, and a summary of any comments or views not accepted and the reasons for, will be attached to the substantial amendment. Upon conclusion of the public comment period, the substantial amendment must be submitted to the Board of County Commissioners for approval, and then submitted to HUD through the IDIS for

the final approval. The amendment must be approved by HUD prior to completion of the CAPER for the corresponding year.

Minor Amendments to the Consolidated Plan, and the Annual Action Plan (in accordance with its Citizen Participation Plan and 24 CFR 91.505), is defined as:

- A change that cancels an activity that involves less than 25% of the fiscal year's funding allocation.

Minor amendments will not require public notices or submission to the Orange County Board of County Commissioners; however, these amendments must be submitted through IDIS and reviewed by HUD prior to completion of the CAPER.

Regardless of its type, an amendment should first be incorporated into the Consolidated Plan and, subsequently, into the Annual Action Plan.

d. Consolidated Annual Performance and Evaluation Report (CAPER)

On an annual basis, Orange County will review and report on the progress it has made in carrying out its five-year strategic plan and Annual Action Plan. This will be done through completion of a Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER is an annual report that provides details on the County's performance in the administration of funding provided under the CDBG, HOME, and ESG programs during the previous grant year and tracks progress made towards five-year goals established in the Consolidated Plan. It describes how funds were actually used and the extent to which funds benefitted low and moderate-income persons. The CAPER is submitted within 90 days of the end of the grant year (by December 30<sup>th</sup>), and it is the basis for an evaluation of annual accomplishments and progress towards goals established in the Consolidated Plan.

The CAPER document includes a description of the resources made available, utilization of available resources, geographic distribution and location of funded projects, households and persons assisted (including racial and ethnic status of persons assisted), actions taken to affirmatively further fair housing, and other actions indicated in the five-year strategic plan and the Annual Action Plan. As required, the CAPER will be submitted to HUD within ninety (90) days after the close of the County's program year.

Public Review and Comments: A notice of not less than fifteen (15) day public review and comments period for the draft CAPER document will be published in a newspaper(s) of general circulation. The notice will also provide information on locations where copies of the entire proposed CAPER report may be examined by the public. Upon request, the County will also make free copies of the proposed CAPER report available to citizens and groups.

e. Analysis of Impediments to Fair Housing Choice (AI or Successor Study)

The County's fair housing study (an Analysis of Impediments to Fair Housing Choice (AI) or any other successor study or report for the purpose of evaluating the County's affirmative commitment to fair housing) is a document that identifies barriers to fair housing choice. Title

VIII of the Civil Rights Act of 1964 and implementing regulations in 24 CFR Part 1 prohibit discrimination in any program or activity funded in whole or in part with federal funds made available under this part. In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing, HUD has a statutory obligation under Section 109 of the HCD Act of 1974, Title I, prohibiting discrimination on the basis of race, color, national origin, disability, age, religion, and sex within CDBG programs or activities. As a requirement for receiving entitlement funds, jurisdictions must submit a certification to HUD to Affirmatively Further Fair Housing, the prerequisite to which is the completion of a fair housing study. In developing the study, the County will follow some of the public participation procedures outlined in the Citizen Participation Plan. Additional participation tools might also be utilized by County staff.

During the preparation of the fair housing study, at least two public meetings will be held to obtain the views of the general public on fair housing-related data and affirmatively furthering fair housing in the County's housing and community development programs. The first public meeting will solicit input on fair housing issues in the County and shall be held during development of the study, before the draft is published for comment. No later than the date of the first public meeting on the fair housing study, any HUD-provided fair housing data will be made available to the public. This may include a link to HUD's website where the data can be readily accessed.

Public Review and Comments: When complete, the County will make available the draft fair housing study for public review and comment for a period of not less than thirty (30) days. A public notice will be published in a newspaper(s) of general circulation. The notice will also provide information on locations where copies of the entire draft fair housing study may be examined by the public. Upon request, the County will also make free copies of the draft study available to citizens and groups.

A second public meeting will be conducted during or after the 30-day public comment period on the fair housing study, during which the County will present the findings of the study and any proposed fair housing goals and priorities for affirmatively furthering fair housing. Any comments or views of residents of the community received in writing, or orally at the second public meeting, will be considered by Orange County in finalizing the fair housing study, and a summary of these comments or views will be attached to the final study.

Revisions to the Fair Housing Study: The County may revise its fair housing study under the following circumstances:

- A material change occurs. A material change is a change in circumstances in the County that affects the information on which the fair housing study is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the study no longer reflect actual circumstances. Examples include, but are not limited to:
  - Presidentially declared disasters, under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.), affecting Orange County that are of such a nature as to significantly impact the steps the County may need to take to affirmatively further fair housing;
  - Significant demographic changes;
  - New significant contributing factors in the County; and

- Civil rights findings, determinations, settlements (including voluntary compliance agreements), or court orders
- Upon HUD's written notification specifying a material change that requires revision.

f. Public Meetings and Hearings

Orange County commits to providing its citizens with reasonable and timely access to public meetings regarding the Consolidated Plan, related Annual Action Plans and any amendments thereto, Consolidated Annual Performance and Evaluation Report (CAPER), and the Citizen Participation Plan.

The County may hold public meetings and public hearings in-person or virtually, with the option for attendees to call in using a telephone, upon request. All efforts will be made to accommodate participation for those with disabilities and/or limited English proficiency. The general public meeting procedures are outlined below.

- **Notice of Public Meetings:** Orange County will make every effort to ensure that the notice of these public meetings is published at least fifteen (15) days in advance of the meetings in a local newspaper of general circulation, and in minority or non-English language newspapers, where available and feasible. Notice of these public meetings will include the time, date, place, and procedures of these meetings as well as topics to be considered. Notices will invite all interested parties to participate and give their comments and input on the proposed plans being developed.
- **Time and Location of Meetings:** Public meetings will be held at times and locations convenient to potential and actual beneficiaries. Unless otherwise noted, public hearings will be held at 6:00 p.m. at a central, accessible location. To the extent possible, public meetings will be held in locations that are wheelchair accessible or where architectural barriers are not present. The County will also make an effort to hold public meetings in locations that are easily accessible by means of public transit.
- **Non-English Speaking Persons:** Orange County will make a translator available at public meetings where a significant number of non-English speaking persons or interest groups notify the staff at least two (2) business days prior to the public meeting and request appropriate translation services.
- **Accommodations for Persons with Disabilities:** Orange County staff will make accommodations for the attendance of persons with disabilities who notify the County at least two (2) business days prior to the public meeting, and identify the accommodations needed, hearing, visual, or other. Arrangements for these services can be made by contacting the respective Division conducting the public meeting, and in the case of Housing and Community Development Division's public meetings at (407) 836-5191.
- **Other Accessibility Accommodations:** Requests for additional accommodations should be made no less than two days prior to the public meeting. Upon receipt of the request, the County will make an effort to provide the following services: an interpreter and audio equipment for the hearing impaired; a reader to review printed materials with the sight impaired; and a foreign language interpreter for non-English speaking residents. Arrangements for language assistance and translation services can also be made in advance by contacting the respective Division conducting the public meeting, and in the

case of Housing and Community Development Division's public meetings at (407) 836-5191.

Materials presented at the public hearings will be made available on the County website in the form of meeting minutes. A recording of public hearings may be made available upon an advanced request by sending an email to [housing@ocfl.net](mailto:housing@ocfl.net).

During the development of a Consolidated Plan/Annual Action Plan, Orange County will hold at least two (2) public meetings annually to obtain citizen input and to respond to questions regarding program activities. These public meetings will be conducted at different times during the program year. These meetings, together, will obtain the views of residents on housing and community development needs, discuss proposed activities, and review program performance.

An initial public meeting will be held during the development of the Plan. A second public meeting will be held near the end of the fifteen (15) day public review period of the CAPER. Every five years, when the Consolidated Plan is being developed, the County will hold an additional public meeting before the proposed Consolidated Plan is published for review to obtain the input of citizens on housing and community development needs. These public meetings are intended to meet the guidelines required by the U.S. Department of Housing and Urban Development established in 24 CFR 91.105(e)1.

g. Public Emergency and Disaster Declaration Waiver Procedures

Occasionally, the County may experience a natural disaster or emergency. Examples of these include major hurricanes and the 2020 COVID-19 virus pandemic. In these situations, either the Orange County Health Department, the Mayor of Orange County, the Governor of the State of Florida, and/or the President of the United States declared that emergency conditions existed. These events are not predictable as to when they will occur or how they will impact County residents, businesses, and/or community resources. Events that qualify as a type of disaster or emergency would not constitute a substantial change, and thereby waive requirements for formal adoption of an amendment to the associated Consolidated Plan/Annual Action Plan. In the event of a local, state, or federal disaster or emergency declaration, the County may fund new activities and/or the reprogram funds, including canceling activities, to meet needs resulting from said disaster or emergency. Therefore, Orange County may utilize CDBG, ESG or HOME funds to meet these needs with a five (5) day public notice and comment period instead of a thirty (30) day public comment period, which is otherwise required for substantial amendments.

Waiver Process: Upon determination of good cause, HUD has the authority to waive certain regulatory provisions of the CDBG, ESG and HOME programs subject to statutory limitations. Examples of good cause for such waivers include the following:

- Presidential disaster declarations under Title IV of the Stafford Act.
- Orange County may seek a waiver to its Citizen Participation Process, in emergency situations when expedited assistance offered through Consolidated Plan/Annual Action Plan covered programs is deemed necessary by the Mayor.
- U.S. Department of HUD issues notices to waive deadlines for submission and reduction of public comment periods.

Following HUD issuance of waiver notices or approval of a waiver request, the County reserves the right to amend the Citizen Participation Plan comment period as follows:

- A reduction in the public comment period for Consolidated Plan/Annual Action Plan substantial amendments from thirty (30) calendar days to five (5) calendar days.
- A reduction in the public comment period from thirty (30) calendar days to five (5) calendar days in the event of a local “urgent needs” emergency or state/federally declared disaster.
- Flexibility in determining what constitutes reasonable notice and opportunity to comment.
- Forego public hearings when the emergency conditions dictate caution; however, the County, at its option, may hold virtual public hearings if determined to be necessary.

For CDBG funding under FY 2019-2020 and The Coronavirus Aid, Relief and Economic Security Act (CARES Act), Orange County may provide a five (5) day notice of a proposed change for public comments, as allowed under the HUD waiver. A special ESG Program funding under the CARES Act (referred to as ESG-CV) is not subject to the consultation and citizen participation requirements that would otherwise apply to the ESG funds. Instead, Orange County must publish how its ESG-CV allocation will be used, at a minimum, on the Internet at its website or through other electronic media. With respect to a declared disaster, the County may elect to use CDBG, ESG or HOME funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal or local sources unless allowed by the federal government. Potential eligible uses of funds are those that are included in this Citizen Participation Plan, the Consolidated Plan, or any other CDBG, ESG or HOME eligible use. HUD may provide new guidance on eligible uses in which the County will comply with and may utilize as well.

Virtual Meetings: In the event that Orange County is closed to the public, or has a declared emergency, or for as long as public health authorities recommend social distancing or limited in person public gatherings for public health reasons, virtual public meetings and hearings may be used (via WebEx platform) to fulfill any public hearing requirements. Orange County still encourages the participation of all citizens, including elderly, minorities, and persons with limited English speaking proficiency, as well as persons with disabilities. To the extent possible, public hearings and meetings will be held at times convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities, upon request. After the meetings, recordings of the proceedings may be provided upon advanced request (please email [housing@ocfl.net](mailto:housing@ocfl.net) to request).

#### **IV. DISASTER RECOVERY PLANNING PROCESS**

Orange County is a recipient of a Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to support long-term recovery efforts following Hurricane Ian (FEMA Disaster No. 4673). The CDBG-DR allocation and program requirements were announced via Federal Register Notice (5/18/2023, Docket No. FR-6393-N-01) with funds made available through the Disaster Relief Supplemental Appropriations Act of 2023 (Public Law 117-328). Among the program

requirements for CDBG-DR is the adoption of citizen participation standards to ensure all citizens of Orange County are provided an opportunity to participate in the planning, implementation, and assessment of the CDBG-DR recovery program. This portion of the County's Citizen Participation Plan governs participation requirements specifically implemented for the County's CDBG-DR program. Unless otherwise specified, other components of the Citizen Participation Plan (e.g., provision of technical assistance; complaint and grievance procedures, etc.) apply to the CDBG-DR program as well as the County's Consolidated Plan programs.

a. CDBG-DR Action Planning Process

Orange County is required to complete and submit an action plan detailing how the County will use all available CDBG-DR funding to support unmet needs. The CDBG-DR Action Plan lays out program details for each area of assistance along with projected timelines, performance metrics, and an expenditure schedule. As further described within this component of the Citizen Participation Plan, the CDBG-DR Action Plan will be made accessible to persons with disabilities and those with Limited English Proficiency (LEP). Before adopting the CDBG-DR Action Plan, the County will consult with a specified group of stakeholders and seek public input on CDBG-DR activities. The draft CDBG-DR Action Plan will be presented to the community for feedback through a public hearing, a public comment period, and other methods as described in this CPP.

b. Stakeholder Consultation

Orange County will consult via meeting, telephone, or email, with the following entities during the preparation of the CDBG-DR Action Plan:

- Affected municipalities within the County;
- Indian Tribes and any state offices with an interest in projects being carried out with CDBG-DR funds;
- Non-governmental organizations;
- Public Housing Authorities;
- Local government and non-profit organizations that administer programs and projects funded through HUD (e.g., Continuum of Care, CDBG, HOME, ESG, etc.);
- Organizations that advocate on behalf of members of protected classes, vulnerable populations, and underserved communities impacted by the disaster, and
- State and local emergency management agencies have primary responsibility for the administration of FEMA funds.

To the extent possible, Orange County will also solicit input from residents of the affected areas. Such input can be collected by various means, which might include the following: community meetings, a public survey, comments cards, etc. Consultations will include a brief overview of CDBG-DR funding and planning processes and will attempt to gather input from stakeholders regarding key issues of local importance that may impact the County's planning and funding allocations for CDBG-DR funds.

c. Draft CDBG-DR Action Plan and Public Comments

Before the CDBG-DR Action Plan is considered for approval by the Board of County Commissioners and prior to submission to HUD, Orange County will ensure that citizens, public agencies, and other interested parties are provided with a reasonable opportunity to examine the contents of the draft CDBG-DR Action Plan and to submit comments during the public comment period. The duration of this public comment period must not be less than thirty (30) days. Orange County will take reasonable actions to ensure that affected citizens, especially those who are members of protected classes, vulnerable populations, and individuals from underserved communities, are notified of CDBG-DR public hearings and public comment periods. Reasonable actions include, but may not be limited to the following:

- A public notice in a newspaper(s) of general circulation;
- Email distribution;
- Press releases;
- Statements by public officials;
- Media advertisements;
- Public service announcements; and/or
- Contacts with neighborhood organizations.

The County's CDBG-DR website will be used as the primary source of information related to CDBG-DR, public hearings, and public comment periods. A full copy of the proposed CDBG-DR Action Plan will be posted to the County's CDBG-DR website and physical copies will be made available for review at the Orange County Public Library, and at the offices of the Orange County Housing and Community Development Division open to the public. Upon request, the County will also make a reasonable number of copies of the CDBG-DR Action Plan available to citizens and groups that request it, including copies to persons who are homebound. Locations and addresses of locations where the plan will be available are as follows:

Orange County CDBG-DR Website  
[[www.ocfl.net/CDBG-DR](http://www.ocfl.net/CDBG-DR)]

Orange County Housing and Community Development Division  
525 E. South St.  
Orlando, FL 32801

Orange County Public Library  
101 E. Central Blvd. Orlando,  
FL 32801

Orange County Community Centers  
[Various - Located in or serving "Most Impacted and Distressed" (MID) areas, as defined in the 5/18/2023 Federal Register Notice]

Any updates or changes made to the CDBG-DR Action Plan in response to public comments, to include oral and written comments, will be clearly identified in the CDBG-DR Action Plan. A summary of comments on the plan, and the County's response to each comment addressing the

substance of the comment, must be included in the final version of the CDBG-DR Action Plan that is uploaded in DRGR.

d. CDBG-DR Public Hearings

Orange County will hold at least one public hearing to gather input regarding the CDBG-DR Action Plan. The CDBG-DR public hearing must be held after the County's proposed CDBG-DR Action Plan has been published on its website for public comment and before submittal of the CDBG-DR Action Plan to HUD. If the County chooses to hold multiple CDBG-DR public hearings, they will be convened in different locations within Orange County to ensure maximum accessibility for impacted citizens and affected local governments. Hearings will be held at times and locations convenient to potential and actual beneficiaries. All efforts will be made to accommodate participation for those who with disabilities and/or LEP with appropriate auxiliary aids and services offered to ensure effective communication.

- **Limited English Proficient (LEP) Persons:** Orange County will make a translator available at public hearings where LEP persons or interest groups contact County staff at least two (2) business days prior to the public hearing and request appropriate translation services.
- **Accommodations for Persons with Disabilities:** Orange County staff will make accommodations for the attendance of persons with disabilities who notify the County at least two (2) business days prior to the public meeting, and identify the accommodations needed, hearing, visual, or other. Arrangements for these services can be made by contacting the respective Division conducting the public meeting, and in the case of Housing and Community Development Division's public meetings at (407) 836-5191.
- **Other Accessibility Accommodations:** Requests for additional accommodations should be made no less than two days prior to the public meeting. Upon receipt of the request, the County will make an effort to provide the following services: an interpreter and audio equipment for the hearing impaired; a reader to review printed materials with the sight impaired; and a foreign language interpreter for non-English speaking residents. Arrangements for language assistance and translation services can also be made in advance by contacting the respective Division conducting the public meeting, and in the case of Housing and Community Development Division's public meetings at (407) 836-5191.

The County may hold CDBG-DR public hearings in-person or virtually. In-person public hearings will be held in facilities that are physically accessible to persons with disabilities. If held virtually, the public hearing format must allow questions in real time, with answers from County staff and/or representatives provided to all hearing attendees.

In public hearings, the County will provide the opportunity for citizens to submit comments orally or in writing. The County treats written and oral comments equally and incorporates both in the response document submitted to HUD with the CDBG-DR Action Plan and any substantial amendments. Materials presented at the CDBG-DR public hearings will be made available on the County's CDBG-DR website in the form of meeting minutes. A recording of public hearings may be made available upon an advance request by sending an email to [housing@ocfl.net](mailto:housing@ocfl.net). Questions

received and answers provided will be made available on the CDBG-DR website within a reasonable timeframe following the conclusion of the public hearing.

e. Comprehensive CDBG-DR Website

Orange County maintains a dedicated CDBG-DR content area within the County's existing public website, which may be found at [[www.ocfl.net/CDBG-DR](http://www.ocfl.net/CDBG-DR)]. This CDBG-DR website permits individuals and entities awaiting disaster recovery assistance, and the general public, to see how all CDBG-DR funds are being used and administered. At a minimum, the website provides residents, affected local governments, and other interested parties the opportunity to review the following documents:

- CDBG-DR Action Plan created using the DRGR system;
- Any amendments to the CDBG-DR Action Plan;
- Citizen Participation Plan;
- Procurement policies and procedures;
- Vital documents that are critical for ensuring meaningful access by beneficiaries or potential beneficiaries generally and LEP persons specifically;
- All executed contracts, including subrecipient contracts, that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.1, are not required to be posted to the County's website);
- Summary description and the procurement status of all services or good being procured by Orange County and its subrecipients using CDBG-DR funds; and
- within three days of submission to HUD, a version of the performance report that omits personally identifiable information.

At all times, the County's CDBG-DR website will be navigable by all interested parties from Orange County's homepage and the County's homepage will link to the CDBG-DR website. The CDBG-DR website will be updated at least quarterly.

f. Amendments to the CDBG-DR Action Plan

As programs and activities develop over time, Orange County will amend its CDBG-DR Action Plan as often as necessary to best address our long-term recovery needs and goals. An amendment may not be triggered if the program or activity is consistent with the descriptions provided in the CDBG-DR Plan. All amendments, substantial or non-substantial amendments, will be noted in the Action Plan by an Amendment chart in the document and will be posted to Orange County's CDBG-DR website.

A substantial amendment to the CDBG-DR Action Plan is defined as one of the following occurrences:

- A change in program benefit or eligibility criteria;
- The addition or deletion of an activity;
- A proposed reduction in the overall benefit requirement; or
- The allocation or re-allocation of more than 25 percent of the total allocation from HUD.

A non-substantial amendment or amendment to the CDBG-DR Action Plan is define as follows:

- Technical corrections or clarifications;
- Budgetary changes that do not meet the monetary threshold for substantial amendments to the Action Plan.

Substantial amendments are subject to the citizen participation process and all citizen participation elements specified in this CPP for the original CDBG-DR Action Plan must be followed for a substantial amendment except for stakeholder consultation and public hearings. Therefore, a public notice of the proposed substantial amendment will be issued and will allow for a thirty (30)-day public comment period. Notice of the amendments will be posted on the Orange County CDBG-DR website and communicated through other means as described under the “Draft CDBG-DR Action Plan and Public Comments” heading above. Comments or views received orally or in writing will be considered in preparing the substantial amendment. A summary of the comments or views and Orange County's responses will be included with the final substantial amendment to the CDBG-DR Action Plan submitted in the DRGR system. For amendments considered to be non-substantial, the County will notify HUD but public comment is not required. Every amendment, substantial or not, will be numbered sequentially, and amendment chart will be posted on the CDBG-DR website.

## **V. ANTI-DISPLACEMENT AND RELOCATION**

In implementing its Consolidated Plan and CDBG-DR activities, Orange County will make every effort possible to avoid or minimize the effects of displacement of persons affected by any CDBG, HOME, ESG, and CDBG-DR funded activities. If an involuntary displacement should occur, the County will provide housing referral assistance and, if required, make relocation payments in accordance with local, state and federal law within the required timeframe.

## **VI. ACCESS TO DOCUMENTS, RECORDS, AND INFORMATION**

Orange County will provide citizens, public agencies or other interested parties, with a reasonable opportunity to comment on any of the consolidated planning documents produced by the Division, to include the Consolidated Plan, any amendments thereto, annual Action Plans, CAPERS, Citizen Participation Plan, and CDBG-DR Action Plan. These documents will be made available and accessible to the public, including various social service providers and groups that represent or serve persons with low and moderate-incomes, persons living in slum and blighted areas and in areas where CDBG funds are proposed to be used, persons with special needs, residents of public housing, persons who are homeless, members of minority groups, LEP persons, and persons with disabilities.

As provided in the text of this CPP and in the County's Language Access Plan, Orange County is committed to taking reasonable steps to provide language assistance to ensure meaningful access to participation by non-English-speaking residents of the County. English-Spanish bilingual Division staff will be available to assist non-English speaking residents in accessing documents, records and other program information associated with Consolidated Plan programs and/or CDBG-DR. The documents will also be made available for public inspection and review during regular business hours at the Orange County Housing and Community Development Division, located at 525 E. South St., Orlando, FL 32801, and on the Orange County Housing and Community

Development webpage at <http://www.ocfl.net/NeighborsHousing/CommunityDevelopment.aspx> or the CDBG-DR website ([www.ocfl.net/CDBG-DR](http://www.ocfl.net/CDBG-DR)), as appropriate.

The applicable public comment periods for each of the documents and ways to provide comments to the Division staff will be advertised in the Orlando Sentinel or other newspaper of general circulation. Orange County will consider any comments or views of citizens received orally or in writing. A summary of these comments or views will be attached to the applicable document and submitted to HUD.

It should be noted that comments that are not related to the documents being reviewed, or comments that contain derogatory and prejudicial language, might not be included in the final documents. However, those comments will be made available to HUD and to the public, upon request.

## **VII. ADDITIONAL PUBLIC PARTICIPATION TOOLS**

In addition to the strategies proposed in this document, Orange County will continue implementing other outreach tools to improve citizen participation. Concerning Public Notices, documents submitted for review may be summarized in the form of flyers or brochures and placed in public libraries and/or community centers in low-income areas for easy accessibility; these summaries will also be published on the County's website. Public Notices may be provided in languages other than English and Spanish, upon request. Furthermore, advertisement will also be done through Spanish radio channels, when necessary, to reach larger audiences and improve access to information for LEP populations.

Email announcements will be shared with agencies and community leaders when documents become available for public review. Orange County will continue consultations with other local governments and jurisdictions in the region to discuss issues of regional importance, such as affordable housing and homelessness.

In an effort to reach out to various groups within the County and to ensure these public participation tools are put into place, Orange County staff will host topic-oriented stakeholder sessions and continue to participate in local housing and community events. To reduce language barriers and allow for better communication, staff who are Spanish speaking, or who speak other languages, such as Haitian Creole or Russian, may be available to assist the public upon request.

Orange County is committed to ensuring that all people, including those who speak a language other than English, have full and equal access to the County's programs and services. As of the date of this plan, Orange County is currently in the process of updating its language accessibility tools, to include changes to the Resolution for Adoption of Title VI Policy and Plan to incorporate a section on the Limited English Proficiency, among other changes, the Mayor-led work to expand access to services for underserved populations, and development of "I Speak" cards. The "I Speak" cards provide access to verbal translation services (in 45 languages) to those in need. The Housing and Community Division will evaluate application of these tools to the community participation initiatives led by the Division staff. Furthermore, the Orange County website ([www.ocfl.net](http://www.ocfl.net)), has the capability to translate the site with the 'Español' "button" feature - to provide for an expanded language access for those with limited English proficiency.

Finally, the Division staff fluent in Spanish often attends meetings of local Hispanic groups and make appearances at the radio and TV shows, as well as social media outlets catering to Spanish-speaking residents of Orange County, to provide information about the programs and activities administered by the Division, as well as the consolidated planning process.

## **VIII. COMPLAINTS AND GRIEVANCE PROCEDURES**

Orange County will provide a substantive written response to all complaints received in writing or orally at public hearings, if any, related to projects or activities proposed or implemented by the Consolidated Plan, the Annual Action Plan, any amendment to these plans, the CAPER, or the CDBG-DR Action Plan. Responses will be provided via email within fifteen (15) working days, where practicable. A record of complaints received will include the nature of the complaint, referrals made, and the final disposition. This record will be included with the final document submitted to HUD.

Comments and/or complaints should be submitted to the Housing and Community Development Division, which administers federal funding from HUD for the CDBG, HOME, and ESG programs, or other programs that may be administered on behalf of HUD from time to time as deemed necessary). The City of Orlando administers funding for the area under the HOPWA program. Comments and/or complaints should be submitted in writing, by mail, or fax to:

Division Manager, Orange County Housing and Community Development Division  
525 E. South Street  
Orlando, FL 32801  
Phone: (407) 836-5191  
Fax: (407) 836-5193

Complaints regarding fraud, waste, or abuse of government funds should be forwarded to the HUD Office of Inspector General Fraud Hotline (phone: 1-800-347-3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)).

To maintain accountability for the use of public funds, the Orange County Comptroller has established the County Audit Division (County Audit) to review allegations of fraud, waste, and abuse of County property and resources. Orange County's citizens or County employees may contact the County Audit Division's Fraud Hotline in instances where fraud, waste, or abuse of County assets or resources are suspected. Individuals are not required to provide their name.

Orange County Fraud Hotline: (407) 836-5775

Orange County provides funding or assistance to all subrecipients and program beneficiaries following applicable federal, state and local regulations, in addition to the guidelines governing each program. All subrecipients and program beneficiaries must meet the established eligibility criteria to access funds or benefits. Subrecipients or individuals who are denied funds or benefits will be notified in writing and will be provided technical assistance upon request.

When there is evidence or suspicion of fraud by a subrecipient or a program beneficiary, the Division sends a letter to the subrecipient or program beneficiary explaining the reason for the

termination of a contract or denial of benefits. A subrecipient or a program beneficiary that has been terminated or denied benefits due to fraud, will not be allowed to participate in the Housing and Community Development Division's federal, state or local funded programs.

Program beneficiaries are entitled to request an informal termination hearing to dispute the alleged fraud. A decision to reinstate the client or withhold the termination of benefits is made by a committee and a designated hearing officer. The process for complaints or disputes regarding termination of contracts or denial of benefits for CDBG-DR can be found at: [www.ocfl.net/CDBG-DR](http://www.ocfl.net/CDBG-DR).

Additionally, Orange County has established a Consumer Protection Office under the Code Enforcement Division to assist residents who are victims of fraudulent or unfair business practices. A Consumer Protection Investigator is available to assist residents subject to fraudulent transactions by contractors.

The Contact information for the Consumer Protection Office is:

Orange County Consumer Protection  
2450 33rd Street, 2nd Floor  
Orlando, FL 32839  
Email: [fraudhelp@ocfl.net](mailto:fraudhelp@ocfl.net)  
Phone: (407) 836-3111

## **IX. CITIZEN PARTICIPATION PLAN CONTACT**

For more information about Orange County's citizen participation efforts regarding Orange County's Consolidated Planning process or CDBG-DR, please contact:

Orange County Housing and Community Development Division  
Email: [Housing@ocfl.net](mailto:Housing@ocfl.net)  
Phone: (407) 836-5150