

City of Baltimore Consolidated Planning Process

CITIZEN PARTICIPATION PLAN

2019 Revision



Revised as of June 25, 2019

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**BALTIMORE CITY
AMENDED CITIZEN PARTICIPATION PLAN
GOVERNING THE CONSOLIDATED PLANNING PROCESS FOR THE CDBG, HOPWA,
HOME AND ESG FEDERAL FORMULA GRANT PROGRAMS AND FOR THE ASSESSMENT
OF FAIR HOUSING**

I. INTRODUCTION

Purpose

The Consolidated Plan (CP) and Assessment of Fair Housing (AFH) are documents required by the U.S. Department of Housing and Urban Development (HUD) for jurisdictions to continue to receive federal housing and community development funding. The City of Baltimore receives Community Development Block Grant (CDBG); HOME Investment Partnership (HOME); Emergency Solutions Grant (ESG) and Housing Opportunities for Persons With AIDS (HOPWA) funding annually. The CP examines the housing and community development needs of the City, sets priorities for these funds, establishes an Annual Action Plan for meeting current and future needs, and identifies the City's performance in meeting its annual goals through the Consolidated Annual Performance Evaluation Report (CAPER).

The AFH replaces the Analysis of Impediments to Fair Housing (AI) to assist the City in identifying fair housing issues and related contributing factors to achieve comprehensive community development goals and affirmatively further fair housing. Both the CP and AFH are required to have a strategy for resident participation in the planning process.

Pursuant to the citizen participation requirements of 24 CFR Section 91.105 and 24 CFR Part 5, the City sets forth the following amended Citizen Participation Plan as it relates to the administration of the Community Planning and Development (CPD) programs funded by HUD. This Citizen Participation Plan presents the City's plan for providing for and encouraging all citizens to participate in the development, revision, amendment, adoption, and implementation of:

- 1) The Citizen Participation Plan (CPP)
- 2) The Assessment of Fair Housing (AFH)
- 3) The Consolidated Plan (CP)
- 4) The Annual Action Plan (AAP)
- 5) The Consolidated Annual Performance and Evaluation Report (CAPER), and
- 6) The Section 108 Loan Guarantee Program

Copies of all documents pertaining to the Consolidated Plan planning process, including the CPP, Annual Action Plan, CAPER and amendments, are available to the public upon request. Citizens will have the opportunity to review and comment on all these documents in draft form prior to final adoption by Baltimore City. These documents will be made available at public libraries, the offices of entities that manage the CP programs and on the Baltimore Housing web site at www.DHCD.baltimorehousing.org. In addition, upon request, federal reports will be provided in a form accessible to persons with disabilities.

The City of Baltimore is committed to compliance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973, as amended. Reasonable modifications and equal access to communications will be provided upon request. The City of Baltimore does not discriminate on the basis of disability in the admission or access to, or treatment or employment in, its programs and activities.

The City of Baltimore considers it the right of all Baltimore's residents to have the opportunity to provide input and comment on the use of public funds and the community's needs related to affordable housing and community and economic development. Upon request, translation assistance will be provided to English as second language and non-English speaking residents.

Lead Agency

The Department of Housing and Community Development is designated by Baltimore City as the lead agency for the administration of the consolidated planning process. It also serves as the administrator of the CDBG, HOME and Section 108 programs. The Mayor's Office of Human Services (MOHS) administers the HOPWA and ESG programs. The Baltimore City Office of Civil Rights and the Housing Authority of Baltimore City both administer the Assessment of Fair Housing programs.

Effective Date

This revised Citizen Participation Plan is effective on June 25, 2019, and shall remain effective until the Baltimore City Department of Housing and Community Development amends or replaces it.

II. 24 CFR 91.105 - THE CITIZEN PARTICIPATION PLAN

The CPP provides for and encourages citizens to participate in the development of the CP, the Annual Action Plan (AAP) through which the CP is implemented, substantial amendments to the CP or the AAP and the Consolidated Annual Performance Report (CAPER). These guidelines are structured on requirements found at Section 103(a) (3) of the Housing and Community Development Act of 1974, and at Section 91.105 of Subpart B of Part 91 of 24 CFR.

Encouragement of citizen participation

The primary purpose of the programs covered by the CPP is to improve communities by providing decent housing, a suitable living environment, and expanded economic opportunities, particularly for low and moderate income people.

The City provides for and encourages Baltimore City residents, including low and moderate-income people, those living in areas designated as revitalization areas or a slum or blighted areas, persons living in areas where CDBG funds may be used, residents of predominantly low-and moderate-income neighborhoods, people of color and minority communities, limited English speaking persons, and persons with disabilities, to participate in the development, revision, amendment, adoption and implementation of the CPP, the Assessment of Fair Housing, the CP, the AAP, and the CAPER.

Consultations

The CPP also encourages local and regional institutions, the Continuum of Care, businesses, developers, non-profit organizations, philanthropic organizations, industry associations, and community and faith-based organizations to actively engage in the processes of developing, revising, amending, adopting and implementing the AFH and the CP. As part of the CPP, the City solicits comments and feedback from all interested parties. All are encouraged to participate in stakeholder interviews, focus groups and/or public meetings held during the development, revision, amendment, adoption and implementation processes for all documents covered by this CPP.

Public Housing Agency

The City encourages, in consultation with the local public housing agency, the participation of residents (including resident advisory boards, resident councils and resident management corporations) of any public housing developments located within the City, to participate in the process of developing, revising, amending, adopting and implementing the AFH and the CP. This will be carried out by providing to the local housing authority information on public meetings, surveys and other outreach initiatives related to the AFH and the CP.

The City will provide information to the executive director of the Housing Authority of Baltimore City (HABC) about the AFH, its affirmatively furthering fair housing strategy, and CP activities related to the public housing developments and communities so that HABC may make this information available at the annual public hearings required for its Public Housing Authority Plan.

III. AFFIRMATIVELY FURTHERING FAIR HOUSING

Assessment of Fair Housing Development

The City shall follow the process and procedures described below in the development of its Assessment of Fair Housing (AFH):

1. HUD Approved Data for Public Review - The City shall make available to the public, residents, public agencies, and other interested parties any HUD-provided data and other supplemental information that will be incorporated into the AFH at the start of the public participation process. The City will make this information available to the public by cross-referencing to data on HUD's website.
2. Stakeholder Consultation and Citizen Outreach - In the development of the AFH, the City shall consult with community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws, such as state and local fair housing enforcement agencies, 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 City. The consultation process shall be conducted to seek participation from any organization that has relevant knowledge or data to inform the AFH.

A variety of mechanisms will be utilized to solicit input from these entities. These may include telephone or personal interviews, mail surveys, internet-based feedback and surveys, focus groups, and consultation workshops.

3. Public Hearing - To obtain the views of the public on AFH-related data and affirmatively further fair housing in the City's housing and community development programs, the City will conduct at least one (1) public hearing before the draft AFH is published for comment.
4. Public Review and Comment Period - The draft AFH will be made available to the public and interested parties for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary of the content and purpose of the draft AFH, the dates of the public review and comment period, the locations where copies of the proposed document can be examined, how comments will be accepted, when the document will be considered for action by the City, and the anticipated submission date to HUD. In addition, the City will make available a reasonable number of free copies of the proposed document to residents and groups upon request. Assistance with accessing the draft document will also be provided upon request to non-English readers and to persons with disabilities.
5. Comments Received on the Draft AFH - The City Contact Person, or his/her designee, will accept all public comments during the 30-day public review and comment period. The City will consider any public comments or views it receives in writing, or orally at public hearings, in preparing the final AFH. A summary of these comments or views, and a summary of any comments or views not accepted and the reason why, will be attached to the final AFH.

Submission to HUD

The final Amended AFH will be submitted to HUD within thirty (30) calendar days following the end of the public review and comment period.

Revisions to the Assessment of Fair Housing (AFH) - 24 CFR 5.164

Pursuant to 24 CFR 5.164 the City will amend its AFH previously accepted by HUD for the following circumstances:

1. A material change occurs - A material change is a change in the circumstances in the City that affect the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstance.
2. Upon HUD's written notification specifying a material change that requires a revision.

IV. THE CONSOLIDATED PLANNING PROCESS

Lead Agency

The Department of Housing and Community Development is designated by Baltimore City as the lead agency for the administration of the consolidated planning process. It also serves as the administrator of the CDBG, HOME, Section 108 programs. The Mayor's Office of Human Services (MOHS) administers the HOPWA and ESG programs.

As the lead agency, DHCD is responsible for developing the five-year Consolidated Plan and Annual Action Plans, and the Consolidated Annual Performance and Evaluation Report (CAPER) and the Assessment of Fair Housing. DHCD coordinates with the MOHS, other city departments, and community partners to develop these documents.

As an entitlement grantee, the City of Baltimore is required to submit a 5-year Consolidated Plan to HUD. The Plan, while having many required parts, has three core components: 1) an analysis of housing and community development needs; 2) a statement of strategies and objectives to address identified needs; and 3) a detailed listing of activities that implement the proposed strategies. The needs assessments and strategies, though they can be amended, remain constant for the Plan's five-year period, while the implementing activities are updated annually and are known as the Annual Action Plan. It is this annual plan that serves as the application for the four federal formula grant programs. The four programs are: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Opportunities for Persons with AIDS (HOPWA) and Emergency Solutions Grant (ESG).

HUD Programs

The City of Baltimore receives four formula grants from HUD, to help address the City's affordable housing, community and economic development needs. The four grant programs are described below:

- ***Community Development Block Grant Program (CDBG)***: Title I of the Housing and Community Development Act of 1974 (PL 93-383) created the CDBG program. It was re-authorized in 1990 as part of the Cranston-Gonzalez National Affordable Housing Act. The primary objective of the CDBG program is to develop viable urban communities for persons of low and moderate income by providing decent housing, a suitable living environment and expanding economic development opportunities. The City develops locally defined programs and funding priorities for CDBG, but activities must address one or more of the national objectives of the CDBG program. The three national objectives are: (1) to benefit low- and moderate- income persons; (2) to aid in the prevention or elimination of slums or blight; and/or (3) to meet other urgent community development needs. The City of Baltimore's CDBG program emphasizes activities that directly benefit low and moderate-income persons.
- ***HOME Investment Partnerships Program (HOME)***: HOME was authorized by the Cranston-Gonzalez National Affordable Housing Act of 1990 and provides funding for housing rehabilitation, new housing construction, acquisition of affordable housing, and tenant-based rental assistance. A portion of the funds (15 percent) must be set aside for

Community Housing Development Organizations (CHDOs) certified by the City of Baltimore.

- **Emergency Solutions Grant (ESG):** The ESG Program was created by the Steward B. McKinney Homeless Assistance Act of 1987 and was amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. ESG has four primary objectives: (1) to improve the quality of existing emergency shelters for the homeless; (2) to provide additional emergency shelters; (3) to help meet the cost of operating emergency shelters; and (4) to provide certain essential social services to homeless individuals. The program is also intended to help reduce the number of people at risk of becoming homeless.
- **Housing Opportunities for Persons With AIDS (HOPWA):** HOPWA funds may be used to provide housing designed to meet the needs of persons with HIV/AIDS, including the prevention of homelessness. Supportive services may also be included. HOPWA grants are allocated to Eligible Metropolitan Statistical Areas (EMSAs) with a high incidence of HIV/AIDS. The City of Baltimore is the grantee for the Baltimore Eligible Metropolitan Statistical Area (EMSA), which includes Baltimore City and Anne Arundel, Baltimore, Carroll, Harford, Howard, and Queen Anne’s counties.

Program Year Schedule

The City of Baltimore’s program/fiscal year begins July 1 and ends June 30. In order to receive entitlement grant funding, the U. S. Department of Housing and Urban Development (HUD) requires jurisdictions to submit a Consolidated Plan every five years. This plan is a comprehensive strategic plan for community planning and development activities. The Annual Action Plan serves as the City’s application for the four HUD formula grant programs. Federal law also requires that citizens have opportunities to review and comment on the local jurisdiction’s plans to allocate these funds.

TENTATIVE TIMELINE	
October/November	Notification of 1 st public hearing regarding needs/performance and Request For Proposal (RFP’s) for coming Fiscal Year funds
November/December	Needs/Performance Public hearing
November/December	<ul style="list-style-type: none"> • Deadline for written comments on the Needs/Performance Hearing • Deadline for submission of CDBG Proposals from community groups
December – March,	<ul style="list-style-type: none"> • Review and finalize proposals in order to prepare the Draft Annual Action Plan for public review and comment • Notification of 2nd public hearing regarding Draft Annual Action Plan

April	Public Hearing on draft Annual Action Plan and/or draft 5-year Consolidated Plan
May	<ul style="list-style-type: none"> • Deadline for written comment on draft plan. • DHCD review of and response to public comments on the draft plan • Submit Annual Action Plan to the City’s Board of Estimates for approval • Submit Annual Action Plan to HUD
June	Anticipated HUD approval of the Annual Action Plan and/or 5-year Consolidated Plan
July 1	Program Year begins
August	<ul style="list-style-type: none"> • Development of the Consolidated Annual Performance and Evaluation Report (CAPER) for the prior fiscal year • Notification of the 15-day Public Comment Period for the prior year CAPER
September 15	Prior Year CAPER is submitted to HUD

Public Hearings

All citizens, including low- and moderate-income persons, persons living in low- and moderate-income neighborhoods, minority populations, non-English speaking persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons/agencies and residents of public and assisted housing developments are encouraged to participate in the development and review of the Consolidated Plan, the Annual Action Plan and the CAPER.

Toward this end, the City of Baltimore will make use of two principal approaches to provide its citizens with opportunities to participate. On a city-wide level, two public hearings will be conducted to enable citizens to provide input regarding community needs and priorities and ideas on what actions to take and how to implement them to make viable, safe and vibrant neighborhoods. Notice of these public hearings will, at least two weeks prior to their occurrence, be advertised in local newspapers, on the Department of Housing and Community Development website and through a mass mailing to community organizations, non-profit social service and housing providers, state and city agencies, organizations representing the elderly, persons with disabilities, the homeless, persons with HIV/AIDS, representatives of organizations that participate in the Continuum of Care program, public housing representatives, business and civic groups, and individuals that have shown an interest in the City’s community planning activities.

All hearings will be open to the public and held at times and locations convenient to persons and households who have, or may, benefit from Consolidated Plan activities and programs. Accommodations for persons with disabilities and assistance for non-English speaking persons will be available upon request. Those wishing to be regularly informed of meetings and other activities related to the Consolidated Plan activities will be added to the program mailing and e-mail lists upon request.

The type and purpose of the two public hearings are as follows:

1. Needs and Performance Hearing

In the fall (usually October or November), and prior to the development of the proposed Consolidated Plan and/or Action Plan, a public hearing will be held to discuss the City's past performance and obtain the views of citizens on community needs as it relates to the use of Federal dollars in the implementation of the four formula programs. At this hearing, citizens will be able to express their views concerning the City's performance and progress, and provide input on the needs of their communities and how these needs should be addressed. In addition, the city will solicit proposals from interested non-profits and other eligible recipients for funding under the CDBG program. A notice will be published in one or more newspapers to inform the public of the time and place of the needs performance hearing as well as a brief description of the nature of the public hearing.

The presentation by City staff at this hearing will identify the amount of Federal dollars expected in the coming year for funding of community development and housing activities and the range of activity types that can be funded. Sources for technical assistance in preparing funding requests will also be given at the hearing. Comments made at the hearing or received in writing, along with actions taken on these comments, will be summarized in the draft Consolidated or Annual Action Plan that is released for public review and comment.

2. Draft Application Hearing

Once the draft Consolidated Plan and/or Annual Action Plan has been developed, a second public hearing will be held (usually in April) to obtain the views of citizens and other interested parties on the contents of the draft. At least two weeks prior to the second public hearing, copies of the draft Consolidated Plan and/or Annual Action Plan will be available to the public for review and comments at the following locations:

Enoch Pratt Free Library
Maryland Room
400 Cathedral Street
Baltimore, Maryland 21202

Department of Housing and Community Development
417 E. Fayette Street - Room 1101
Baltimore, Maryland 21202

Mayor's Office of Human Services (MOHS)
7 E. Redwood Street, 5th Floor
Baltimore, MD 21202

Copies will also be posted on the Baltimore Housing website: <https://dhcd.baltimorecity.gov/m/plans-reports>. A notice regarding the availability of the draft Consolidated Plan and/or Annual Action Plan will be placed in one or more local

newspaper at least two weeks prior to the public hearing. Citizens may comment on the proposed draft Consolidated Plan and/or Annual Action Plan at the hearing or may provide comments in writing to DHCD or MOHS within thirty (30) days after the release of the draft. A summary of any comments accepted or not accepted, and the reasons therefore, will be incorporated into the Final Consolidated Plan and/or Annual Action Plan submitted to HUD.

Preparation of the Consolidated Annual Performance and Evaluation Report (CAPER)

Performance reports on programs covered by the Consolidated Plan/AAP are prepared by the City of Baltimore for annual submission to HUD within ninety (90) days following the end of the fiscal year. Prior to submission of the CAPER to HUD, citizens will be given an opportunity to review and comment on the contents of this document. A local newspaper, as well as the City's website, will be used to inform the public of the availability of the draft CAPER, after which citizens will have fifteen (15) days for submission of comments. The CAPER shall also be placed on view at the same public places where the Consolidated Plan/AAP shall be made available and posted to the City's website.

All public comments received orally or submitted in writing regarding the CAPER will be considered and a summary of these comments or views and staff responses will be incorporated into the report submitted to HUD.

Public Notice of and Public Comment on Substantial Amendments.

In accordance with 25 CFR, Part 91, governing the Consolidated Submission for Community Planning and Development Programs, Subpart B, Section 91.105 (c), titled "Amendments," the City must specify the criteria to be used for determining what constitutes a substantial amendment to the Consolidated Plan or Annual Action Plan and what action must be taken should a substantial amendment occur.

Outlined below are the criteria which will be used in defining substantial amendments for the four programs that make up the Consolidated Plan: Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Housing Opportunities for Persons With AIDS (HOPWA), and Emergency Solutions Grant (ESG).

• CDBG And Section 108 Activities

A change is considered substantial if any of following criteria is met:

1. Addition of a new activity not previously described in the Consolidated or Action Plan.
2. Deletion of an activity previously described in the Consolidated or Action Plan.
3. Change in the purpose, scope, location or beneficiaries of an activity previously described in the Consolidated or Action Plan.
4. An increase or decrease in the original projected budget, activity or program by 50% or more.

Should a substantial amendment to CDBG or Section 108 activities occur, there will be a public comment period of not less than thirty (30) days, beginning with the date of written notification to the affected citizens and community groups, for submission of written comments. In addition, a notice of the substance of the proposed amendment will be

published in at least one newspaper and the proposed amendment will be posted on DHCD's website. Letters will be mailed or emailed to all participants on the CDBG mailing list and the listing of projects to be amended will also be attached.

- **HOME Activities**

A change is considered substantial when the tenure of the beneficiaries targeted for assistance under the HOME program changes (e.g., from renters to owners or owners to renters).

Should a substantial amendment to a HOME activity occur, there will be a public comment period of not less than thirty (30) days, beginning with the date of written notification to the affected citizens and community groups, for submission of written comments. In addition, a notice of the substance of the proposed amendment will be published in at least one newspaper and posted on the city's website.

- **HOPWA Activities**

A change is considered substantial if a project is cancelled or if an increase of more than \$5,000 in additional funds is needed to complete a HOPWA funded activity.

Should a substantial amendment to a HOPWA activity occur, there will be a public comment period of not less than thirty (30) days, beginning with the date of written notification to the affected citizens and community groups, for submission of written comments. In addition, a notice of the substance of the proposed amendment will be published in at least one newspaper and posted on the city's website.

- **ESG Activities**

A change is considered substantial if a project change fails to: a) assist additional emergency shelters; b) improve the quality of existing emergency shelters; c) meet the costs of providing services to homeless individuals and families.

Should a substantial amendment to an ESG activity occur, there will be a public comment period of not less than thirty (30) days, beginning with the date of written notification to the affected citizens and community groups, for submission of written comments. In addition, a notice of the substance of the proposed amendment will be published in at least one newspaper and posted on the city's website.

For all four programs a summary of comments received, and actions taken on these comments will be incorporated into the amended Consolidated Plan and/or amended Annual Action Plan submitted to HUD.

Changes that are not considered substantial amendments include:

- Liquidation of unspent dollars for completed or not-initiated activities. These funds may be reallocated consistent with the goals of the current 5-year Consolidated Plan;
- Consolidated Plan data updates such as census data, income limits, and fair market rents;
- A minor change in location of a specific property is not considered a substantial change as long as the purpose, scope, and intended beneficiaries remain essentially the same;

- The transfer of some (but not all) funds within a project from one approved budget line item to another approved budget line item (e.g., construction rather than engineering).
- Adjustments to budgets of activities or projects of less than 50% of the original budget as found in the approved AAP.

V. PLAN FOR MINIMIZING DISPLACEMENT

Baltimore City strives to minimize the involuntary displacement of households from a dwelling unit or businesses from a commercial site resulting from publicly assisted housing and community development programs. The City recognizes the social and economic viability of neighborhoods that contain a mix of low- and middle-income households and the importance of community input in arriving at a representative mix.

An essential element in achieving this goal is to support housing and community development efforts that maintain and strengthen the physical and social condition of individual households and neighborhoods, such that whole-scale redevelopment, and its generally present corollary of displacement, is not a required course of action.

To implement the above, the City establishes the following plan:

- Enforcement of City housing and building codes to maintain the physical condition and systems of structures and to require, when needed, correction of substandard conditions.
- Funding rehabilitation of existing housing stock, primarily for homeowners, so that units can remain viable residences.
- Expanding, through down payment and mortgage assistance and the provision of counseling, homeownership opportunities throughout city neighborhoods.
- Providing employment training and small business development assistance to increase employment and improve individual economic viability.
- Strategic demolition of abandoned and blighting structures in stable neighborhoods.

VI. PLAN FOR RESIDENTIAL AND BUSINESS RELOCATION

The relocation process is overseen by the Division of Land Resources in the Department of Housing and Community Development. The Division strictly follows the Federal Uniform Relocation Act. The following describes the steps taken by Land Resources to identify, inform and assist households and businesses in need of relocation assistance once they have been notified that the City has an interest in acquiring a structure:

- A windshield survey is conducted to determine occupancy status;
- A general information notice is sent to the occupant of possible relocation;
- On site one-on-one interviews are conducted with the business, owner occupant or tenant to determine their needs and preferences with regard to relocating;
- Contact letters are mailed to occupants immediately;
- Surveys are conducted, comparable locations are identified, and the entitlement letter is issued within a few days (depending upon the cooperation from the occupant and the availability of affordable comparables);
- Once a property is acquired by the City, a 90-day notice is issued to occupants unless already vacated;
- Each staff person has the responsibility of managing his/her case files and understands

the importance of sending out notices in a timely manner following the steps listed above.

Displacees receive counseling in order to facilitate the relocation assistance process. Individuals who have been displaced from Section 8 housing are issued written guarantees to assure their return to comparable units. Each family is advised of its maximum replacement housing payment prior to displacement.

VII. ACCESS TO RECORDS

1. CDBG and HOME Programs

Consistent with applicable laws regarding personal privacy and obligations of confidentiality, DHCD will provide for full and timely disclosure of its program records and other information. Relevant documents will be available for review upon request at 417 E. Fayette Street (Room 1101 & Room 301) during normal working hours. Such documents include:

- All mailings and promotional material;
- Records of hearings;
- All key documents, including Consolidated Plans and/or Annual Action Plans, letters of approval, grant agreements, Citizen Participation Plans, Performance Reports, and other reports required by HUD;
- Copies of the regulations and assurances governing the program;
- Documents regarding other important program requirements, such as contracting procedures, environmental policies, fair housing and other equal opportunity requirements, relocation provisions.

2. ESG and HOPWA Programs

Consistent with applicable laws regarding personal privacy and obligations of confidentiality, MOHS will provide for full and timely disclosure of its program records and other information. Relevant documents will be available for review upon request at 7 E. Redwood Street, 5th Floor during normal working hours. Such documents include:

- All mailings and promotional material;
- Records of hearings;
- All key documents, including Consolidated Plans and/or Annual Action Plans, letters of approval, grant agreements, Citizen Participation Plans, Performance Reports, and other reports required by HUD;
- Copies of the regulations and assurances governing the program;
- Documents regarding other important program requirements, such as contracting procedures, environmental policies, fair housing and other equal opportunity requirements, relocation provisions.

VIII. TECHNICAL AND TRANSLATION ASSISTANCE

Technical assistance will be provided to help citizen participants understand program requirements and develop proposals. Technical assistance information is available at public hearings, or citizens may call (410) 396-1966 for assistance or for information about submitting proposals.

Upon request, arrangements will be made for translation for those persons who speak a foreign language or who use other forms of communication such as sign language.

IX. COMPLAINTS

Citizens or organizations with complaints or grievances should outline them in a letter to the Commissioner of DHCD. Where practicable, DHCD will provide written responses within fifteen (15) working days of receipt of the complaint. The Commissioner's address is 417 E. Fayette Street, 14th Floor, Baltimore, MD 21202.

