



# HOME-ARP Public Participation

May 2022

# HOME-ARP Allocation Plan Public Participation Requirements and Best Practices

## Purpose/Learning Objectives for this Video FAQ:

Summarize the public participation requirements for the allocation plan outlined in [Notice CPD-21-10](#).

Review the requirements at [24 CFR 91.105](#), which apply to a participating jurisdiction's (PJ's) public participation process for HOME-ARP.

Provide best practices for PJs to consider as part of their HOME-ARP allocation plan public participation process.



# HOME-ARP Public Participation Requirements

- A PJ's HOME-ARP public participation process must comply with:
  - The PJ's citizen participation plan for substantial amendments.
  - The requirements at 24 CFR 91.105.
  - The alternative requirements in the HOME-ARP Notice and Appendix.



# Compliance with Federal Fair Housing and Civil Rights Requirements

- Throughout the public participation process, PJs must follow applicable fair housing and civil rights requirements and procedures that should be outlined in their citizen participation plan for:
  - Effective communication;
  - Accessibility and reasonable accommodations for persons with disabilities;
  - Meaningful participation by those with limited English proficiency (LEP).
- The fair housing and civil rights procedures must also be outlined as part of the public notice.



# Required Elements of the Public Notice

- The public notice should encourage citizen participation in the development of the allocation plan.
- A PJ must provide reasonable notice to the public, consistent with the process outlined in the PJ's Citizen Participation Plan.
- The public notice must:
  - Provide the start and end dates of the public comment period and pertinent details of the planned public hearing.
  - Outline how persons requiring special accommodations or translation services for the public hearing can obtain those accommodations.
  - Indicate how members of the public wishing to submit written comments during the public review and comment period may do so.
- The notice should provide a link to obtain more details on the substantial amendment, such as the amount of money, how the funds are proposed to be used, and make the allocation plan available for review. Any links to websites must be correct and functioning.



# Components Of Public Participation for Review and Comment on the Allocation Plan

- The consolidated plan regulations at 24 CFR 91.105(e) state that reasonable notice of the public hearing is at least 14 days from the date the notice is published.
- The public can participate by attending the public hearing to share their comments.
- During the public comment period, the public can also provide comments in writing without attending the public hearing.



# Public Comment Period

Provide  
information  
and an  
opportunity  
to comment

Through the public notice, provide information about the amount of funding and types of activities and provide the public an opportunity to comment on the allocation plan **for at least 15 days.**



# Public Hearing Requirement

Hold a  
minimum of  
one public  
hearing

PJs must hold **at least one** public hearing during the public comment period, prior to submission, as an opportunity to solicit comments and feedback from the public. Accommodations must be provided during the public hearing as requested.





# Summary of Public Participation and Comments Received

**PJs must consider any public comments received during the 15-day public comment period. This includes:**

- Comments received in writing.
- Comments received in any format during a public hearing.

**The allocation plan must include:**

- A description of the public participation process;
- A description of any efforts made to broaden public participation;
- A summary of comments and recommendations received, and;
- Any comments or recommendations not accepted, and why.

PJs are not expected to accept every comment that is provided during this process. The PJ must use the information they receive through the public participation process in a way that demonstrates the comments shared were taken into consideration during the planning process.



# Public Participation Requirements Following Allocation Plan Approval

Once the Allocation Plan is accepted by HUD, the PJ must:

Make the final plan available to public.

Make the materials available in a form accessible to persons with disabilities, upon request.

Translate materials into different languages to accommodate those with LEP, upon request.





# Best Practice Strategies for Public Participation

# Best Practices for Public Participation: Broadening Outreach

Potential ways to broaden outreach include:

- Use local television or radio to share information about HOME-ARP and the opportunity for public comment.
- Feature the HOME-ARP information, public meeting, and public comment opportunities prominently on the PJs website.
- Share the public notice and link to the proposed allocation plan on a variety of media platforms: newspapers, newsletters, local Facebook pages, Instagram, Twitter.
- Distribute on the listservs for membership organizations to help reach a broader audience.
- Translate the notice and allocation plan into languages commonly spoken in the geographic area, such as those outlined in the community's Language Access Plan.
- Ask service organizations to post the translated notice on their websites and social media outlets and in waiting rooms, and other locations in their offices.



# Best Practices for Public Participation: Encouraging Meaningful Input

- In addition to posting the allocation plan for comment, provide the public with more information on the plan to increase the depth of citizen input including details on:
  - The information learned through the consultation process.
  - The needs assessment and gaps analysis results.
  - A description of the proposed HOME-ARP activities and the reasons they have been proposed.
- Include the option to submit comments in a written or verbal format during public hearings.
- Offer the ability to participate in the public hearing and submit comments virtually.
- Offer several public hearings in different locations and/or virtual formats to increase citizen input.
- Hold an additional public hearing for non-English speakers.



# Best Practices for Public Participation: Encouraging Broader Participation

- Provide video recordings or audio recordings of the notice and materials.
- Host the public hearing in a community center or other building that is centrally located with available public transportation.
- Choose a day of the week and time convenient to members of the qualifying populations, such as holding the session on the weekends or in the evening.
- Allow for public comment in a variety of formats, including email and text.



# Best Practices for Public Participation: Support Timely Field Office Approval of Allocation Plans

- In order to support the timely approval of the allocation plan, it is suggested that as part of the allocation plan submission, PJs:
  - Submit the published notice to HUD.
  - Include the affidavit of publication to HUD along with the allocation plan.
  - Submit a screenshot of the webpage where the HOME-ARP plan has been posted.



# Resources



- [HOME-ARP Page on the HUD Exchange](#)
- [Notice CPD-21-10](#)
- [Waivers and Alternative Requirements For Implementation of the HOME American Rescue Plan \(HOME-ARP\) Program](#)
- [HOME-ARP Allocation Plan AAQ portal](#)

