Citizen Participation Plan for Consolidated Plan Programs State of Nevada

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Table of Contents

Introduction 1
Background 2
A. Actions to Broaden Citizen Participation in the Consolidated Planning Process 2
B. Citizen Participation Plan Requirements for the Citizen Participation Plan 4
C. Consolidated Plan, Annual Action Plan, or Other Plans 5
D. Amendments 8
E. Performance Report – CAPER (Consolidated Annual Performance Evaluation Report) 10
F. Citizen Participation Requirements for Local Governments 11
G. Availability to the Public 13
H. Access to Records 14
I. Complaints 14
J. Technical Assistance from the State 15
K. Affirmatively Furthering Fair Housing Public Participation 16

Introduction

The Citizen Participation Plan (CPP) describes how the State of Nevada (State) will solicit and include citizen input in the consolidated planning process to ensure that the State's goals and activities reflect the housing and community development priority needs of the State. The State receives an annual allocation from the U.S. Department of Housing and Urban Development (HUD), dictated by formula, for the following grant programs:

- Community Development Block Grant (CDBG)
- Emergency Solutions Grants (ESG)
- HOME Investment Partnerships Program (HOME)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Housing Trust Fund (HTF)

HUD requires that states develop and implement a 5-year Consolidated Plan (Con Plan), 1-year Annual Action Plan (AP), and a Consolidated Annual Performance Evaluation Report (CAPER), hereafter collectively referred to as the Con Plan Reports. The Con Plan Reports are intended to furnish the framework whereby the State can identify housing, homeless, community and economic development needs, recognize resources that will be tapped and actions to be taken to address those needs, as well as look back and evaluate the State's progress toward achieving its strategic goals. The State is also required to assess barriers to fair housing and offer recommendations to affirmatively further fair housing. This assessment is presented in the State's Analysis of Impediments to Fair Housing Choice (AI) report, which also requires citizen participation. The citizen participation process requirements of the AI will mirror the Con Plan process. These, including requirements of the CPP, are described in 24 CFR Part 91 Consolidated Submissions for Community Planning and Development Programs and 24 CFR 91.115 Citizen Participation Plan: States. The citizen participation requirements for local governments receiving CDBG funds from the State are described in 24 CFR 570.486.

Citizen participation and consultation is a foundational element of the consolidated planning process. Citizen participation and consultation ensures that input from a wide range of citizens, including planned and actual beneficiaries, people of low and moderate income, minorities, people with disabilities, people with limited English proficiency, service providers, advocacy groups, public and private agencies, and community leaders are incorporated into the development and implementation of the Con Plan Reports.

In 1994, HUD published regulations requiring state agencies that administer the above formula grant programs to incorporate planning and application requirements into one master plan, the Con Plan. The new planning process was intended to more comprehensively address the goals of the CDBG, ESG, HOME, HTF, and HOPWA programs: to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons. To encourage participation in the Con Plan process among citizens and stakeholders the State

will follow the standards set forth in this CPP during development of the Con Plan Reports and the AI. Further, the CPP may also be applicable to other HUD funding, including special congressional appropriations, special allocations, and one-time grant awards, when the Federal Register notice or Notice of Funding Opportunity (NOFO) identifies 24 CFR Part 91 or any of the previously listed funding programs as the governing citizen participation standard.

Background

The following State agencies administer the HUD programs covered by the Con Plan:

- The Nevada Governor's Office of Economic Development (GOED): Rural Economic & Community Development – **CDBG**
- The Department of Business and Industry: The Nevada Housing Division (NHD) - **HOME, HTF, and ESG**
- Department of Health and Human Services Nevada Division of Public and Behavioral Health (DPBH) - **HOPWA**

The lead agency overseeing the development of the Con Plan Reports and implementing the requirements of this CPP is GOED. Citizen participation requirements will also apply to any Substantial Amendments to the Con Plan or AP.

The CPP includes a section for the citizen participation requirements applicable to "non-entitlement" jurisdictions that receive their CDBG funding from the State of Nevada. Non-entitlement jurisdictions implementing CDBG activities will need to conduct their own citizen participation process as described in Section F of this CPP. These jurisdictions do not file Con Plans individually and do not receive funding from HUD directly. Alternatively, the term "entitlement area" refers to cities and counties that, because of their size, can receive federal funding directly. These areas must complete a Con Plan separately from the State's to receive funding. Entitlements not covered by the State of Nevada's Con Plan (and therefore the state CPP) are Carson City, City of Henderson, City of Las Vegas, City of North Las Vegas, City of Reno, City of Sparks, and Clark County. Individuals wishing to contribute to the consolidated planning process for the areas not covered by the State's plan should contact housing and community development specialists in these locations.

A. Actions to Broaden Citizen Participation in the Consolidated Planning Process

The housing and community development programs covered by the Con Plan are designed to primarily benefit low- and moderate-income persons, including other targeted groups. The

consolidated planning process involves determining needs and resources, setting priorities and goals, then administering and evaluating the outcomes of the program; that is, who was served, and how they were served.

The State will make an effort to encourage participation and input on the Con Plan Reports and the administration of the programs, from all citizens, including the following targeted groups:

- Planned and actual beneficiaries of the programs
- Low- and moderate-income persons
- Minorities
- People with disabilities
- Non-English-speaking persons or communities
- Residents of rural communities
- Residents living in slums and blighted areas, and where HUD program funds are proposed to be used
- Residents living in close proximity to proposed HUD funded projects
- People experiencing homelessness
- People living with HIV/AIDS

To better reach the targeted groups mentioned above, the State may provide notices of the Con Plan Reports to the organizations with more frequent day-to-day contact with the targeted groups, these organizations may include, but are not limited to:

- Subrecipients
- State recipients
- Housing development partners
- Public and private agencies providing health care, education, employment, and fair housing services
- Social service providers including those serving children, elderly persons, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons experiencing homelessness,
- Community Action Agencies (CAAs)
- Advocacy groups
- Neighborhood groups
- Community leaders
- Government entities
- Libraries
- Schools
- Faith based institutions
- Continuums of Care
- Homeless services provider
- Immigration services provider
- Welcome centers for new arrivals

- Businesses
- Non-profit organizations
- Philanthropic organizations

The State will also consult with these groups for their input on the development of the Con Plan Reports. These organizations will be encouraged to circulate surveys, hold meetings on site, or publicize meetings at other locations, including virtual meetings. The means by which the State will encourage citizen participation may include, but are not limited to, traditional publication in newspapers, e-mail and email lists, through its own and partner organization websites, social media, flyers, and signage in areas where HUD funding is proposed to be used.

B. Citizen Participation Plan Requirements for the Citizen Participation Plan - 24 CFR 91.115 (a)

Amendments to the State of Nevada CPP will follow the citizen participation process required for a Substantial Amendment to the Con Plan or AP, except for the length of the public comment period, which will be 15 days. That process includes public notification, a public hearing, and a public comment period, and will provide citizens and local government with a reasonable opportunity to comment on changes to the CPP before the amendment is finalized. Comments on the amendment from the above-named populations and organizations in Section A will be encouraged.

The State will provide a copy of the CPP in a format accessible to persons with disabilities upon request. Public notices will include a provision to request accommodation for persons with disabilities or of limited English proficiency. If virtual, language translation closed captioning will be optional for participants. If in person, language translation services or other reasonable accommodation can be arranged in advance. The procedure for public noticing, hearing, and commenting detailed in Section C. 2-4 will be followed when the CPP is amended. The public notice will include where the draft plan can be accessed for review; a copy will also be available at:

Governor's Office of Economic Development
Rural Economic & Community Development Division
808 W Nye Lane
Carson City, NV 89703
Community Development Block Grant (CDBG) | Governor's Office of Economic Development

Department of Business & Industry
Nevada Housing Division
1830 E College Parkway, Suite 200
Carson City, NV 89706

C. Consolidated Plan, Annual Action Plan, or Other Plans

1. Assistance Expected, Activities, and Beneficiaries - 24 CFR 91.115 (b)(1)

Before the State finalizes the adoption of the Con Plan, it will publish the proposed plan for public review in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments. The plan shall include:

- The amount of assistance the State expects to receive,
- The range of activities that may be undertaken, including the estimated amount that will benefit people of low- and moderate-income,
- Plans to minimize displacement of people and to assist any persons displaced.

The State will publish a notice for the proposed plan in several newspapers of general circulation at least two weeks before the public hearing. Copies of the notice will also be distributed to organizations signed up for email updates about these programs from GOED, NHD, and DPBH. The notice provided to these organizations directly from the State will be in English and in Spanish. These agencies will encourage distribution of the notice to their subrecipients and the beneficiaries they serve. Notices will be sent to organizations that participated in the consultation process for the Con Plan, as well as to non-entitlement jurisdictions partnering with the State. The notice will include the websites and physical locations where copies of the entire proposed Con Plan may be obtained or examined.

Citizens and groups may obtain a reasonable number of free copies of the proposed Con Plan by contacting:

Governor's Office of Economic Development
Rural Economic & Community Development Division
808 W Nye Lane
Carson City, NV 89703
Community Development Block Grant (CDBG) | Governor's Office of Economic Development

Department of Business & Industry
Nevada Housing Division
1830 E College Parkway, Suite 200
Carson City, NV 89706

Documents may be reviewed at the Governor's Office of Economic Development: Rural Economic & Community Development Division website, with the specific location and link indicated on the public notice. The State will provide a copy of the notice in a format accessible to

persons with disabilities upon request.

2. Public Notice for Review of Plans - 24 CFR 91.115(b)(2)

The State will publish a notice indicating the dates of the public comment period, a summary of the contents of the proposed Con Plan and AP in several newspapers of general circulation, as well as distribute the notice to interested parties through the State's email lists. Notices distributed to interested parties directly by the State will be in English and Spanish. The State will encourage citizen and stakeholder participation from the groups aforementioned in Section A. The proposed plan will be available for review through the link in the public notice, or upon request to NHDgrants@housing.nv.gov.

3. Public Hearing on Housing and Community Development Needs - 24 CFR 91.115(b)(3)

The State will foster participation in the community needs assessment by encouraging participation from the general public and aforementioned groups in Section A.

The State will conduct a minimum of two public hearings for the development of the Con Plan to obtain citizens' views and to respond to proposals and questions. The hearings will take place at different stages of the consolidated planning process. At least one will occur prior to the development of the proposed plan and will be intended to solicit public input regarding distinct issues, thereby aiding policy formation. At least one hearing will occur after the proposed plan has been released for public review, allowing interested parties an opportunity to review the plan in its entirety, ask questions, and provide comments on the State's proposed goals and activities.

Information about the time, location, and subject of each meeting will be provided to citizens at least two weeks in advance through public notice. This notification will be disseminated to the aforementioned groups in Section A, published in statewide newspapers of general circulation and on State websites. Additionally, the state of Nevada may, at its discretion, actively solicit input on housing and community development issues during the year with regional forums, town hall meetings, and other venues as they may present themselves. Staff may also attend other meetings and conventions in Nevada throughout the year, thereby providing an opportunity for additional public information on the Con Plan or other planning efforts.

Every attempt will be made to ensure that public hearings are inclusive. Hearings will be held at convenient times and locations and in places where people most affected by proposed activities can attend, including virtually. The State will utilize facilities for hearings that are accessible to persons with mobility impairments. If given advance notice of a reasonable accommodation request, the State will provide appropriate materials, equipment, and interpreting services to facilitate the participation of non-English speaking persons and persons with visual or hearing impairments. Interpreters will be provided at public hearings where a considerable number of non-English speaking residents can be reasonably expected

to participate. All public hearings and public meetings associated with the consolidated planning process will conform to applicable Nevada open meetings laws.

i. Advance Notice

The State will publish the public notice at least two weeks (14 calendar days) in advance of the public hearing. The public notice will contain:

- Con Plan or AP summary
- Amount of assistance the State expects to receive
- Range of activities to be undertaken and estimated beneficiaries
- Time and date of public hearing
- The date range of the public comment period and how to submit comments
- Where to review the draft Con Plan or AP
- How to request language translation services or reasonable accommodation for persons with disabilities.

The public notice will be provided to the groups aforementioned in Section A.

ii. Time and accessible location to beneficiaries

In order to increase the likelihood of citizen participation, the State will conduct the public hearing either virtually, in person, or as a hybrid of both formats. The State will choose a time, format, and location that will be most accessible to beneficiaries and interested parties. Public hearings will be recorded, if virtual, and allow for comments, questions, and answers.

iii. Non-English-speaking needs

The CDBG Division within The Nevada Governor's Office of Economic Development will follow procedures in accordance with the GOED Language Access Plan. The state of Nevada will make every effort to ensure that people with limited English proficient (LEP) have meaningful access to the public hearings covered in this CPP by providing accommodations. Solicitation for language accommodation will be made in the public notice. Public notices distributed by the State directly will be in English and Spanish. If the public hearing is in-person and a request is received within the timeframe indicated on the notice, the State will provide translation services. For virtual meetings, translation features will be enabled through the virtual platform being used. The State will provide for American Sign Language translation if requested. The State will ensure residents will have equal access to federally funded programs and services as is required under Title VI of the Civil Rights Act of 1964.

To assist participating agencies, the state of Nevada has developed a bulletin instructing them to conduct the four-factor analysis outlined below to help develop their own Language Access Plan (LAP), ensuring that LEP persons have meaningful access to their federally funded programs and services. The State will also provide technical assistance to assist the agencies in conducting the four-factor analysis and in developing their LAPs.

The four-factor analysis is as follows:

Factor 1: The number or proportion of LEP persons served or encountered in the eligible service area.
Factor 2: The frequency with which LEP persons come in contact with the program.
Factor 3: The importance of the information, services, program, or the activity to people's lives.
Factor 4: A costs versus resources and benefits assessment for providing language services.

The State is confident that no person will be denied federally funded services based on their ability to speak English.

4. Public Comment Period - 24 CFR 91.115(b)(4-5)

The State will receive comments from citizens, units of general local government, and other interested parties on its draft Con Plan and AP for a period not less than 30 calendar days prior to submission of the Con Plan and AP to HUD. This public comment period will be indicated on the public notice. All comments on the Con Plan or AP received during the public comment period will be considered. A summary of these comments or views and a summary of any comments or views not accepted and the reasons therefore shall be attached to the final version of the plan and then published on the administering agency state website. Comments may be made via email, in person, during a public hearing, through telephone, or through the contact information in the notice.

D. Amendments

1. Criteria for Substantial Amendment to Consolidated Plan, Annual Action Plan, or Other Plans - 24 CFR 91.115(c)(1)

The following actions taken by the State will require a Substantial Amendment. A Substantial Amendment will involve the citizen participation process: public notice, public comment period, and public hearing:

- Adding a new goal to the Con Plan or AP
- A substantial change in the method of distribution of funds, whereas substantial change means a change in the method of distribution that had not previously been described in the current year Con Plan or AP
- To carry out an activity not previously described in the Con Plan or AP
- To change the purpose, scope, location, or beneficiaries of an activity.

i. Non-substantial amendments

Non-substantial Amendments are any amendments needed to the Con Plan or AP that do not meet the conditions of a substantial amendment described above. Non-substantial amendment will not involve the public participation process. The State may update the plan and make an announcement informing its stakeholders of the update if the change is determined to be of interest to its stakeholders.

2. Notice and Opportunity to Comment - 24 CFR 91.115(c)(2)

The public notice and public comment period for a Substantial Amendment will follow the process as described in Section C. The groups mentioned in Section A will be solicited for their input on the Substantial Amendment. The State will hold one public hearing summarizing the changes and allowing for public comment.

Substantial Amendments will be available at the Governor's Office of Economic Development: Rural Economic & Community Development Division website. The State will provide a copy of the Amendment in a format accessible to persons with disabilities upon request.

3. Summary of Comments - 24 CFR 91.115(c)(3)

A summary of comments or views and a summary of any comments or views not accepted and the reasons why shall be included in the final version of the amendment. Comments may be made via email, in person, virtually during a public hearing, through telephone, or through the contact information in the notice. The State will consider any comments or views received in writing or orally at the public hearings in preparing the substantial amendment.

4. Urgent Needs

It may be necessary to amend the Con Plan or AP in the event of an emergency such as a natural disaster. These amendments may include funding new activities or the reprogramming of funds, including canceling activities, to meet community development needs that have an urgency. Therefore, the state of Nevada may utilize its HOME, HTF, ESG, HOPWA, or CDBG funds to meet an urgent need without the normal public comment period, which is otherwise required for substantial amendments.

To comply with the national objective of meeting community development needs having an urgency, an activity will alleviate existing conditions that the state of Nevada certifies:

- Pose a serious and immediate threat to the health and welfare of the community
- Are of recent origin or recently became urgent
- Where the state is unable to finance the activity on its own
- Other resources of funding are not available to carry out the activity.

A condition will generally be considered of recent origin if it developed or became critical within 18 months preceding the Rural Economic & Community Development Division's certification.

E. Performance Report – CAPER (Consolidated Annual Performance Evaluation Report) - 24 CFR 91.105(d)

The CAPER covering CDBG, HOME, ESG, HTF, and HOPWA program accomplishments is submitted by Rural Economic & Community Development Division to HUD within 90 days after the end of the State Program Year. The CAPER also requires a public comment process.

1. Public Notice - 24 CFR 91.115(d)(1)

The State will publish a notice two weeks in advance of the public comment period in a newspaper of general circulation as well as provide notice to the aforementioned groups in Section A. Public notices distributed directly by the State will be in English and Spanish. The notice will contain a summary of the CAPER, its contents and purpose, how to provide public comment, as well as where to view the entire report. At the State's discretion, a public hearing may be held.

2. Public Hearing - 24 CFR 91.115(d)(1)

The State may elect to hold a public hearing. If one is held, the hearing may be virtual, in-person, or as a hybrid meeting. The State will choose a time, format, and location that will be most accessible to beneficiaries and interested parties. Public hearings will be recorded, if virtual, and allow for comments, questions, and answers. Citizens and interested parties will be able to provide comments at hearings, as well as ask questions about the State's performance.

3. Public Comment Period - 24 CFR 91.115(d)(1)

The State will provide for a 15-day public comment period, the dates of which will be indicated in the notice. The State will consider any comments or views of citizens received in writing or orally at public hearings for the CAPER.

4. Summary of Comments - 24 CFR 91.115(d)(2)

The State will summarize, catalogue, and respond to comments, then include the public comments and responses in the final CAPER report.

F. Citizen Participation Requirements for Local Governments - 24 CFR 91.115(e) and 24 CFR 570.486

Local governments applying for CDBG are required to hold three public hearings covering community development and housing needs (including affirmatively furthering fair housing), development of proposed activities, and a review of program performance before submission of an application to the State. Local governments receiving CDBG funding from the State shall meet the following requirements:

1. Encourage Participation of Beneficiaries - 24 CFR 570.486(a)(1)

Local governments shall provide for and encourage citizen participation, particularly by low- and moderate-income persons and persons who reside in slums or blighted areas in which CDBG funds are proposed to be used. This can be accomplished through public hearings informing citizens of planned activities, public noticing, email communications, through neighborhood groups, non-profit service providers, and other organizations that work with low- and moderate-income persons.

2. Reasonable and Timely Access to Meetings - 24 CFR 570.486(a)(2)

Local governments shall provide citizens with reasonable and timely access to local meetings, information, and records relating to proposed and actual use of funds. Public hearings must be held at times and accessible locations convenient to potential or actual beneficiaries, with a provision in the notice for accommodations for persons with disabilities, and non-English speaking citizens. Local governments should be prepared to meet reasonable accommodations.

3. Assistance Expected, Activities, and Beneficiaries - 24 CFR 570.486(a)(3)

Prior to selecting projects and submitting applications for CDBG funding assistance, eligible applicants are required to conduct three public hearings for the following purposes:

- Advising citizens of the amount of CDBG funds expected to be made available for the current fiscal year
- Reviewing program performance, past use of funds, and making its community development and housing needs, including the needs of low- and moderate-income families and the activities to be undertaken to meet such needs, available to the public
- Advising citizens of the range of activities that may be undertaken with CDBG funds
- Advising citizens of the estimated amount of CDBG funds proposed to be used for activities that will serve a national objective of benefiting low- and moderate-income persons, addressing slums and blight, or to meet an urgent need

- Advising citizens of the proposed CDBG activities likely to result in displacement and the local government's anti-displacement and relocation plans
- Obtaining recommendations from citizens regarding the community development and housing needs of the community, including affirmatively furthering fair housing

The public hearings to cover community development and housing needs must be held before submission of an application to the State. After considering all recommendations and input provided at the public hearing(s), the county commission, or city, town, or village council determines at an official public meeting which project(s) to submit for funding assistance. Evidence of compliance with these public hearing regulations must be provided with each application (i.e. copy of hearing notices or publication of notices, minutes of the meetings, list of needs, and activities or projects to be undertaken).

Amendments to goals, objectives, and applications may also be subject to the public participation process.

4. Technical Assistance - 24 CFR 570.486(a)(4)

Local governments shall provide technical assistance to groups and representatives of low- and moderate-income persons who request assistance in developing proposals (including proposed strategies and actions to affirmatively further fair housing) in accordance with the procedures developed by the State. Such assistance need not include providing funds to such groups. The level and type of assistance is to be determined by the local government.

5. Public Hearing Requirements - 24 CFR 570.486(a)(5)

Public hearings shall be noticed in advance, held in the format best suited for that local jurisdiction's needs, practices, and requirements (in-person, virtual, or hybrid), and be held at times and in accessible locations convenient for potential beneficiaries. Public hearings shall be conducted in a manner that meets the needs of non-English speaking residents when a significant number of non-English speaking residents can reasonably be expected to participate.

6. Public Notice and Substantial Amendments to Activities - 24 CFR 570.486(a)(6)

The notice of the public hearing shall be published 14 days in advance of the hearing date, and shall contain the purpose, scope, and location of the projects and the proposed beneficiaries. The notice should also include the hearing and public comment period details, as well as reasonable accommodation details for LEP citizens and those with a disability.

The public participation process is triggered when a local government plans to substantially change the purpose, scope, location, or beneficiaries of an activity, or carry out an activity not described in the application to the State. A substantial amendment will require public notice, public hearing, and a public comment period.

7. Complaints and Grievances - 24 CFR 570.486(a)(7)

The local government shall provide citizens with the address, phone number, and times for submitting complaints and grievances, as well as provide timely written answers to written complaints and grievances; within fifteen working days where practicable.

8. Serving Beneficiaries Outside the Jurisdiction of the General Local Government - 24 CFR 570.486(b)

Any activity carried out by a recipient of State CDBG program funds must significantly benefit residents of the jurisdiction of the grant recipient, and the local government must determine that the activity is meeting its needs in accordance with section 106(d)(2)(D) of the Housing and Community Development Act of 1974. For an activity to significantly benefit residents of the recipient jurisdiction, the CDBG funds expended by the local government must not be unreasonably disproportionate to the benefits to its residents.

9. Activities in Entitlement Jurisdictions - 24 CFR 570.486(c)

Any activity carried out by a recipient of State CDBG program funds in entitlement jurisdictions must significantly benefit residents of the jurisdiction of the grant recipient, and the State CDBG recipient must determine that the activity meets its needs in accordance with section 106(d)(2)(D) of the Housing and Community Development Act of 1974. For an activity to significantly benefit residents of the recipient jurisdiction, the CDBG funds expended by the local government must not be unreasonably disproportionate to the benefits to its residents. In addition, the grant cannot be used to provide a significant benefit to the entitlement jurisdiction unless the entitlement grantee provides a meaningful contribution to the project.

G. Availability to the Public - 24 CFR 91.115(f)

The following documents will be available to the public by viewing them on the Governor's Office of Economic Development: Division of Rural Economic & Community Development Division Website: [Community Development Block Grant (CDBG) | Governor's Office of Economic Development]

- CPP
- Con Plan
- AP
- Substantial Amendments
- CAPER
- AI

Physical copies may also be viewed at the Governor's Office of Economic Development: Division of Rural Economic & Community Development Division Office. Materials in a form accessible to persons with disabilities are available upon request from the CDBG Program Administrator listed at the GOED CDBG website above.

H. Access to Records - 24 CFR 91.115(g)

To the extent allowed by law, interested citizens and organizations shall be afforded reasonable and timely access to records covering the preparation of the Con Plan or AP, project evaluation and selection, HUD's comments on the Plan, and annual performance reports. In addition, materials on formula grant programs covered by the Con Plan or AP, including activities undertaken in the previous five years, will be made available to any member of the public who requests information. A complete file of citizen comments will also be available for review by interested parties. After receiving notice of HUD's approval of its Con Plan or AP, the GOED: Rural Economic & Community Development Division will inform those on its mailing list of the availability of the final Plan document.

I. Complaints - 24 CFR 91.115(h)

Citizens, administering agencies, and other interested parties may submit complaints and grievances regarding the programs to: Rural Community Development (CDBG), the Nevada Housing Division (HOME, HTF, ESG), and the Division of Public and Behavioral Health administrator (HOPWA). Complaints should be in writing, specific in their subject matter, and include facts to support allegations. The following are considered in determining complaints where a response is due:

- The administering agency has purportedly violated a provision of the CPP
- The administering agency has purportedly violated a provision of federal CDBG, HTF, ESG, HOME, or HOPWA program regulations
- The administering agency, or any of its contractors, has purportedly engaged in questionable practices resulting in waste, fraud, or mismanagement of any program funds.

Residents may also present complaints and grievances orally or in writing at community meetings or public hearings. All public comments, including complaints and grievances, made either orally or in writing within the 30-day public comment period, will be included in the final Con Plan or AP. Such complaints or grievances for CDBG, HOME, ESG, HTF, or HOPWA shall be directed to the Con Plan representative at the appropriate Division.

Governor's Office of Economic Development
Attention: CDBG Program Administrator
Rural Economic & Community Development Division
808 W Nye Lane
Carson City, NV 89703

Department of Business & Industry
Nevada Housing Division
1830 E College Parkway, Suite 200
Carson City, NV 89706
nhdgrants@housing.nv.gov

State of Nevada Office of HIV
Attention: HOPWA
2290 S. Jones Blvd., Suite 110
Las Vegas, Nevada 89146
nvhopwa@health.nv.gov

1. Timely Response to Complaints or Grievances

Upon receipt of a written complaint, the designated representative at Rural Economic & Community Development, Nevada Housing Division, or the Division of Public and Behavioral Health shall discuss the matter with the department manager, respond to the complainant in writing within 15 calendar days, and maintain a copy of all related correspondence, which will be subject to review.

A copy of the response will be transmitted, concurrently, to the complainant and to the division directors. If, due to unusual circumstances, the designated representative finds that they are unable to meet the prescribed time limit, the limit may be extended by written notice to the complainant, which must include the reason for the extension and the date by which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

All public review materials and performance reports will include data, as appropriate under confidentiality regulations, on any written complaints received and how each was resolved.

J. Technical Assistance from the State - 24 CFR 91.105(i)

Groups or individuals interested in obtaining technical assistance from the State to develop project proposals or applying for funding assistance through HUD formula grant programs

covered by the Con Plan or AP may contact the Governor's Office of Economic Development: Rural Economic & Community Development for CDBG; the Nevada Housing Division for HOME, HTF and ESG; and the Division of Public and Behavioral Health for HOPWA. Such assistance may be of particular use to community development organizations, nonprofit service providers, and for-profit and nonprofit housing development groups that serve or represent persons of low- and moderate-income. Pre-application workshops offer basic program information and materials to potential project sponsors, and staff members provide in-depth guidance and assistance to applicants and program participants on an on-going basis.

K. Affirmatively Furthering Fair Housing Public Participation

The State of Nevada will take action to affirmatively further fair housing through developing and implementing an AI report or alternative report that assesses the State's fair housing impediments, actions, and recommendations. The State will follow the same citizen participation process as the Con Plan. The State will take the following actions:

1. Make the HUD–provided data and any other data to be included in the AI available to its residents, public agencies, and other interested parties.
    a. The State will make HUD-provided data, and any other supplemental information the State intends to incorporate into an Assessment of Fair Housing (AFH), available to the public, public agencies, and other interested parties as soon as feasible during the start of the public participation process. The State may make the HUD-provided data available to the public by cross-referencing to the data on HUD's website. Before the draft AI is published for public comment, one public hearing on AFH-related data and affirmatively furthering fair housing in the State's housing and community development programs will be held.

2. Publish the draft AI in a manner that affords residents and others the opportunity to examine its content and submit comments.
    a. The draft AI will be published for public review on the Governor's Office of Economic Development: Division of Rural Economic & Community Development Division website, with a physical copy available onsite. The link to that webpage will be provided in the public notice.

3. Provide for at least one public hearing during the development of the AI.
    a. The public will be given reasonable and timely advance notice (a minimum of 14 days) prior to the public hearing. The notice will include details such as: purpose and summary of the AI, time and location of the public hearing, provision for requesting reasonable accommodation, the public comment period and how to submit comments. The public hearing may be in person or virtual, depending on what the State determines to be the most effective way to reach the public. The

hearing will obtain the public's views on AFH-related data and affirmatively furthering fair housing in the State's housing and community development programs. The hearing will provide a summary of AI purpose and offer an opportunity for questions, answers, and comments. Reasonable accommodation will be provided for people with a disability, LEP, or other reasons.

4. Provide a period to receive comments from residents of the community.
    a. The State will provide a 30-day public comment period to receive comments from the public and other interested parties. A summary of comments received during the public comment period will be included in the final AI.
    b. The State will consider any comments or views of residents and units of general local government received in writing or orally at the public hearings in preparing the final AI.

5. If materially revising the AI, the State will provide for the citizen participation process before the revision is finalized. Material change means a change in circumstances in the jurisdiction of a program participant that affects 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 circumstances.

The State will encourage participation of a broad scope of citizens and organizations as outlined in Section A by inviting participation directly and through the organizations who work with these populations most frequently. This will be done through any combination of notices, surveys, focus groups, or meetings to solicit feedback on community development needs.

Written complaints regarding the AI can be submitted in writing to:

Governor’s Office of Economic Development
Attention: CDBG Program Administrator
Rural Economic & Community Development Division
808 W Nye Lane
Carson City, NV 89703