

MOBILE COUNTY COMMISSION

**CITIZEN PARTICIPATION PLAN
FOR
U.S. DEPARTMENT OF HOUSING
&
URBAN DEVELOPMENT FUNDED PROGRAMS**



Original Plan – adopted March 11, 2002
Substantial Amendment –adopted May 26, 2020

CITIZEN PARTICIPATION PLAN

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SECTION 1 – INTRODUCTION TO CITIZEN PARTICIPATION PLAN (CPP) & CONSULTATION REQUIREMENTS

The Mobile County Commission has designed this Citizen Participation Plan to provide for and encourage citizen participation in all of its programs, as funded by the U.S. Department of Housing and Urban Development (HUD), including special allocations, HUD funding that is provided through the State of Alabama, and other programs as may be identified in the future. This Plan supersedes all other Citizen Participation Plans which have been previously adopted by the County Commission.

The primary goal of this Citizen Participation Plan is to provide all citizens of the Urban County¹ (currently includes nine incorporated municipalities of Bayou La Batre, Chickasaw, Citronelle, Creola, Mount Vernon, Prichard, Saraland, Satsuma, and Semmes and all of unincorporated Mobile County, Alabama) with adequate opportunity to participate in an advisory role in the planning, development, implementation, and assessment of the County's HUD funded program(s). The Plan sets forth policies and procedures for citizen participation which are designed to maximize the opportunity for citizen participation throughout the various stages, steps, and processes involved with HUD program funding, and other decision/policy making processes that the County may so identify.

Consultation Requirements for Fair Housing Analysis/Assessment

In accordance with 24 CFR 91.105(a) as well as those noted in the following section entitled ***Consultation Requirements for Consolidated Plan***, the County will encourage citizens to participate in the development of its Fair Housing Analysis/Assessment², any revisions to the Fair Housing Analysis/Assessment, the Consolidated/Action Plan, any substantial amendment to the Consolidated/Action Plan, and the performance report. The County will encourage participation by low- to moderate-income persons, particularly those persons living in areas designated as a revitalization area or a slum and blighted area and in areas where HUD funds are proposed to be used, and by residents of predominantly low- to moderate-income neighborhoods (including elected government officials as well as non-governmental organizations who represent and/or serve such persons and/or areas). The County will take appropriate actions to encourage the participation of all its citizens, including minorities; non-English speaking persons and/or limited-English proficient persons, as provided in the County's Four-Factor Analysis and Language Access Plan

¹ Subject to change, particularly if new incorporations are formed.

² The reference to the Fair Housing Analysis/Assessment includes the Analysis of Impediments to Fair Housing Choice as well as certifications and efforts related to Affirmatively Furthering Fair Housing.

for Limited English Proficiency Persons³ (adopted as revised on 10/9/18); as well as persons with disabilities.

The County shall encourage the participation of local and regional institutions, Continuums of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in the process of developing and implementing its Fair Housing Analysis/Assessment and the Consolidated Plan. The County shall encourage the participation of public and private organizations. The County shall also include broadband internet service providers; organizations engaged in narrowing the digital divide; agencies whose primary responsibilities include the management of flood prone areas, public land, or water resources; and emergency management agencies in the process of developing the Consolidated Plan.

The County shall encourage, in conjunction with consultation with public housing agencies (PHA), the participation of residents of public and assisted housing developments (including any resident advisory boards, resident councils, and resident management corporations) in the process of developing and implementing the Fair Housing Analysis/Assessment and the Consolidated Plan, along with other low-income residents of targeted revitalization areas in which the developments are located. The County shall make an effort to provide information to the PHA about its Fair Housing Analysis/Assessment and Consolidated Plan activities related to its developments and surrounding communities so that the PHA can make this information available at the annual public hearing(s) required for the PHA Plan.

With respect to 24 CFR 91.100 (e), the Fair Housing Analysis/Assessment, the County shall consult with community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws, such as state or local fair housing enforcement agencies (including participants in the Fair Housing Assistance Program), fair housing organizations and other 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 County. This consultation must occur at various points during the planning process with any organizations that have relevant knowledge or data to inform the certification to affirmatively further fair housing and that are sufficiently independent and representative to provide meaningful feedback to a jurisdiction on the Consolidated Plan and its implementation.

³ The Four-Factor Analysis and Language Access Plan for Limited English Proficiency Persons identifies Spanish/Spanish Creole as the only language that does not meet the HUD safe harbor threshold. Accordingly, the County has committed to provide written translation of vital information only in Spanish/Spanish Creole. Public notices are identified as “vital” and must include a written statement in Spanish/Spanish Creole indicating that translation services will be provided upon request, when the Citizen Participation Coordinator has been given sufficient advance notice.

In addition to the consultations noted above, the County will explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods, and the review of program performance.

Consultation Requirements for Consolidated Plan

Further expounding on the Consolidated Plan requirements noted in the preceding section entitled ***Consultation Requirements for Fair Housing Analysis/Assessment*** and in accordance with 24 CFR 91.100⁴, the County shall consult with other public and private agencies that provide assisted housing, health services, and social services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons), community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws.

When preparing the portions of the Consolidated Plan describing the County's homelessness strategy and the resources available to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness, the jurisdiction must consult with (i) the Continuum(s) of Care that serves the County, (ii) public and private agencies that address housing, health, social service, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families, including homeless veterans; youth; and/or other persons with special needs, (iii) publicly funded institutions and systems of care that may discharge persons into homelessness (such as health-care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions), and (iv) business and civic leaders.

When preparing the portion of its Consolidated Plan concerning lead-based paint hazards, the County shall consult with state or local health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data regarding housing in which children have been identified as lead-poisoned.

When preparing the description of priority non-housing community development needs, the County must notify adjacent units of general local government, to the extent practicable.

The County also should consult with adjacent units of general local government and local and regional government agencies, including local government agencies with

⁴ Pursuant to HUD's proposed rule for Affirmatively Furthering Fair Housing, as published January 14, 2020, the County has attempted to incorporate proposed changes, with the intent of further revising this Plan, if required, upon issuance of the final rule.

metropolitan-wide planning and transportation responsibilities, particularly for problems and solutions that go beyond a single jurisdiction.

The County shall also consult with local PHAs operating in the jurisdiction regarding consideration of public housing needs, planned programs and activities, strategies for affirmatively furthering fair housing, and proposed actions to affirmatively further fair housing in the Consolidated Plan.

Should the County receive an ESG (Emergency Solutions Grant), the Continuum of Care must be consulted in determining how to allocate funds for eligible activities; in developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and in developing funding, policies, and procedures for the operation and administration of the HMIS (Homeless Management Information System).

SECTION 2 – SCOPE OF PARTICIPATION

Mobile County will make a reasonable effort to provide for citizen participation throughout the planning, development, implementation, and assessment of all of its HUD funded program(s).

Citizens and others identified herein are encouraged to participate in all phases of HUD funded program(s) and will be provided access to HUD data as well program information to include requirements for the development of the Fair Housing Analysis/Assessment and Consolidated Plan as required by 24 CFR 91.105(b)⁵ through the County’s public notification and public hearing process.⁶ While all citizen comments and related input will be considered, the Mobile County Commission assumes final responsibility and authority for the planning, development, implementation, and assessment of all HUD funded program(s).

SECTION 3 – CITIZEN PARTICIPATION COORDINATOR

The Director of Grants Management (or designee) shall serve as the Citizen Participation Coordinator for all matters related to the Citizen Participation Plan. The Coordinator shall be responsible for overseeing all aspects of citizen participation, except those which may be specifically delegated to other parties by the Plan.

⁵ Mobile County will make HUD-provided data and other supplemental information required by 24 CFR 91.105(b) available as part of its citizen participation efforts to be used in planning and decision making. Prior to adoption of the Consolidated Plan, the County will make available 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- to moderate-income.

⁶ Release of information will be subject to both the Privacy Act of 1974, as amended, and redaction of any personally identifiable information, if applicable.

The specific duties and responsibilities of the Citizen Participation Coordinator shall include, but not necessarily be limited to: issuance of public notifications; dissemination of information concerning proposed projects and the status of current project activities; coordinating various groups which may be participating in the process; receiving written comments; serving as a vehicle by which ideas, comments, and proposals from local citizens and others identified herein may be transmitted to local officials and/or program staff; and monitoring the citizen participation process while proposing such amendments to the Citizen Participation Plan as may be necessary.

The Citizen Participation Coordinator may be contacted through the Mobile County Grants Department during regular business hours. Contact information is provided at <https://www.mobilecountyal.gov/departments/grants> or staff can be reached at Mobile Government Plaza, South Tower, 8th Floor, 205 Government Street 36644. All questions concerning citizen participation should be addressed to the Citizen Participation Coordinator.

SECTION 4 – TECHNICAL ASSISTANCE

Consistent with 24 CFR 91.105(i), the Mobile County Grants Department shall provide technical assistance to individual citizens and groups (especially those representative of low- to moderate-income persons), as well as other interested parties as may be required to adequately provide for citizen participation in the planning, development, implementation, and assessment of HUD funded programs.

Such technical assistance is intended to increase citizen participation in the decision making process and to ensure that such participation is meaningful. Technical assistance shall also be utilized to foster public understanding of HUD program requirements.

Technical assistance shall be provided on request and may include, but not necessarily be limited to: interpreting HUD funded grant programs, their rules, regulations, procedures and/or requirements; providing information and/or materials concerning these programs; and assisting low- to moderate-income citizens and others as identified herein to develop statements of views, identify their needs, and to develop activities and proposals for projects which, when implemented, will address those needs. Technical assistance may be obtained by contacting the Citizen Participation Coordinator.

SECTION 5 – PUBLIC HEARINGS & RELATED COMMENT PERIODS

Citizen participation will be conducted on a community-wide basis and will actively involve all citizens, inclusive of those individuals and groups identified herein at **Section 1 – Introduction**. The following provides an overview of the public hearing process and its requirements.

5.1 Public Hearing Meeting Times and Location

All public hearings will be held at times and locations which are generally accessible to all citizens and groups identified herein, with special consideration for those with disabilities (24 CFR 91.105(e)(3-4) & (f)).

Hearings will typically be held on the ground level of Government Plaza located at 205 Government Street, Mobile Alabama 36644. This site is centrally located and generally accessible to all citizens, inclusive of persons with disabilities. Hearings may, however, at the option of the County be held at an alternate location to be specified in the public hearing notification(s) or be done by virtual means (alone or in concert with an in-person hearing) as long as this allows for questions and answers in real-time. If virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or non-English/limited English proficient persons will be made available to the greatest extent possible.⁷

5.2 Public Notification(s)

Consistent with 24 CFR 91.105(e)(2), the County will provide at least ten (10) days' (commencing on the date of publication) notice of public hearings by publishing in one or more local newspaper(s) of general circulation, as defined in the Code of Alabama Title 6, Section 6-8-60, and/or by including electronic notice on the Grants Department website. Additional notifications (as deemed appropriate) may also be provided to others, including individuals, groups, organizations, and members of the Urban County using social media and/or electronic mail. The County may waive public notification requirements when HUD provides waivers and in cases where unusual circumstances⁸ justify alternative means of notifying the general public. In such situations, shorter notice may be given (subject to HUD waiver provisions

⁷ Virtual hearings (alone or in conjunction with an in-person hearing) provide additional flexibility in terms of participation by the public; however, when public health and or safety risks are involved such hearings may be necessary to protect both public hearing presenters and participants. Auxiliary aids and services, as defined by 28 CFR 35.104, will be utilized based on demand/request to the extent feasible.

⁸ Note there may be instances/situations that must be addressed in advance of formal HUD waiver notification. These include, but are not limited to, federal/state/locally declared disasters or emergency events to include natural disasters, terrorism and infectious diseases, such as the Coronavirus (COVID-19) pandemic, that may necessitate expedited substantial amendments.

and/or local determination of what constitutes reasonable notice⁹) and public notices posted using electronic media only (e.g., website posting and potentially social media and/or electronic mail). Each notice of a hearing shall include the time, date, place, and topics to be discussed.

5.3 Public Hearing for Consolidated/Action Plan Adoption

At least two public hearings will be conducted to obtain the views of citizens and others identified herein and to respond to proposals and questions, to be conducted at a minimum of two different stages of the Program Year. Together, the hearings will address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing, and a review of program performance.

The initial hearing will be held during the development of the Consolidated and/or Action Plan(s) and a second hearing will be held prior to the proposed Consolidated Plan and/or Action Plan being published for comment. These public hearings will assist the County with obtaining the views of citizens and groups identified herein on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing (24 CFR 91.105(e)).

5.4 Publication of Consolidated/Action Plan & Citizen Comment Period

Information about the proposed Consolidated/Action Plan will be provided to the public in the following manner:

- a. A summary of the proposed Consolidated/Action Plan will be published in one or more local newspaper(s) of general circulation (as defined in the Code of Alabama Title 6, Section 6-8-60) and by including electronic notice on the official Mobile County Grants Department website. Additional notifications (as deemed appropriate) may also be provided to others, including individuals, groups, organizations, and members of the Urban County using social media and/or electronic mail. The publication is required at least one time and may be published additional times, if deemed necessary by the County Commission or Citizen Participation Coordinator.
- b. The Consolidated/Action Plan and related materials will be made available at public places and/or websites associated with public

⁹ Alabama law does not set a minimum requirement for County Commission meetings in the event of an emergency; however, for the purposes of HUD funded programs, the minimum advance notice requirement is determined to be 48 hours, unless HUD issues a requirement that is more lenient/stringent.

libraries and city/town halls within the Urban County. Upon request documents will be mailed, and/or materials specific to addressing needs of low- to moderate-income persons as well as those with disabilities or non-English/limited English proficient persons.

A comment period of thirty (30) days¹⁰, as required by 24 CFR 91.105(c)(2), shall be provided for citizen comment following the publication of the proposed Consolidated/Action Plan. The 30 day comment period will commence on the date of publication of the summary in one or more local newspaper(s) of general circulation or by electronic notice posted on the official Mobile County Grants Department website. A summary of written comments expressed following the publication of the proposed Consolidated/Action Plan and comments expressed verbally or otherwise during the public hearing process shall be attached to the final Consolidated/Action Plan. A summary of these views and comments and a summary of any comments or views not accepted and the reasons therefore shall be attached to the final Consolidated/Action Plan.

5.5 Amendments to the Consolidated Plan or Action Plan and Revisions to the Fair Housing Analysis/Assessment Public Hearings

The County will assure the opportunity for citizen participation prior to the implementation of a HUD funded program when amendments to projects are under consideration by the County. Consistent with 24 CFR 91.105(c), public notification (defined at paragraph 5.2) will be provided for a 30-day public comment period for all substantial amendments to the Consolidated Plan and Action Plan, or revisions to the Fair Housing Analysis/Assessment.

Citizen participation shall be obtained and considered for any substantial amendment to a HUD funded program. Pursuant to 24 CFR 91.505, a substantial amendment is defined as follows:

1. A funding change which involves an increase of 75% or more of the budgeted dollar amount for any project or for changes that exceed 50% of the respective annual allocation for the HUD funded program associated with that project, whichever is greater.¹¹
2. The addition of a new project (with associated activities) not previously included in an action plan.

¹⁰ Subject to change based on future HUD requirements and/or waivers that may apply in certain circumstances.

¹¹ Example: The County is considering an increase to the budget of a CDBG public service project from \$5,000 to \$10,000. The change would constitute a 100% increase in the project budget; however, based on a CDBG allocation of \$1,000,000 for the respective year, a \$5,000 increase would be less than 50% of the allocation (i.e., \$500,000). Accordingly, this budget amendment would not constitute a substantial amendment herein.

3. A change to the purpose, scope, location or beneficiaries associated with an approved project, pursuant to the following:
 - A substantial change in purpose refers to changes that are inconsistent with the original purpose for a project.
 - A substantial change in scope refers to changes that are inconsistent with the original scope of work for a project.
 - A substantial change in location refers to location-specific projects which would add or delete a location(s).
 - A substantial change in beneficiaries refers to decreases in program beneficiaries of 50% or more.

All amendments to the Consolidated Plan will be consistent with its certification to affirmatively further fair housing as well its Fair Housing Analysis/Assessment.

Revisions to the Fair Housing Analysis/Assessment will be determined by the County subject to receiving information that demonstrates significant housing market changes and/or adoption of new/updated land use legislation and/or regulations that significantly impacts the Urban County.

The County may waive public notification requirements (per section 5.2 above) or the public comment period when HUD provides waivers and in cases where unusual circumstances¹² justify alternative means of notifying the general public.

The County will consider any comments or views of citizens and others identified herein received in writing, or orally at the public hearings. A summary of these comments or views, and those not accepted along with the reasons, shall be attached to the final Consolidated/Action Plan or Fair Housing Analysis/Assessment (as applicable).

5.6 Assessment of Performance Public Hearings and Performance Reports

Citizens of the County will be provided with the opportunity to comment on the performance of local officials, the County staff, consultants, engineers and contractors, and the actual use of HUD program funds prior to submission of its

¹² Note there may be instances/situations that must be addressed in advance of formal HUD notification. These include, but are not limited to federal/state/locally declared disasters or emergency events to include natural disasters, terrorism and infectious diseases, such as the Coronavirus (COVID-19) pandemic, that may necessitate expedited substantial amendments.

Consolidated Annual Performance and Evaluation Report (CAPER). Citizens will also be requested to assess the performance of the County in resolving identified needs and in achieving its Consolidated Plan goals and objectives.

5.7 Public Notification(s) for the CAPER

Prior to submission of the CAPER, the County will notify the public of its availability and provide a minimum of fifteen (15) days for comment. The County will consider any comments received during the comment period as well as comments or views received in writing or orally at public hearing(s) held in preparing the performance report. A summary of these comments will be attached as required by 24 CFR 91.105(d).

5.8 Additional Hearings

Other public hearings may be held as deemed necessary by the County in order to inform citizens and others identified herein of HUD funded program(s) and funding opportunities, and to solicit citizen opinions and comments. All additional hearings shall comply with the general requirements set forth herein.

5.9 Accessibility to Non-English Speaking and/or Limited English Proficiency Persons

Local officials will undertake all reasonable actions necessary to allow such persons to participate in the citizen participation process. The County's Four-Factor Analysis and Language Access Plan for Limited English Proficiency Persons identifies Spanish/Spanish Creole as the only language that does not meet the HUD safe harbor threshold. Accordingly, the County has committed to provide written translation of vital information, only in Spanish/Spanish Creole. Public notices are identified as "vital" and must include a written statement in Spanish/Spanish Creole indicating that translation services will be provided upon request, when the Citizen Participation Coordinator has been given sufficient advance notice.

5.10 Accessibility of Low- to Moderate-Income Persons

The public hearing procedures outlined herein are designed to promote participation by low- to moderate-income persons, particularly those persons living in areas designated as a revitalization area or a slum and blighted area and in areas where HUD funds are proposed to be used, and by residents of predominantly low- to moderate-income neighborhoods. Accordingly, the County may also take additional steps to further promote participation by such groups or to target program information to these persons should officials believe that should additional action is necessary and/or that such persons may otherwise be excluded. Activities to

promote additional participation may include: posting of notices in any identified revitalization area or slum/blighted neighborhoods, and in places frequented by low-to moderate-income persons; and holding public hearings in such neighborhoods or areas where existing or proposed HUD funded program(s) will be utilized.

5.11 Accessibility to Persons with Disabilities

The locations of all public hearings as described herein shall be accessible to persons with disabilities. Also, the County shall make reasonable accommodation¹³ by providing auxiliary aids and services as may be needed, when the Citizen Participation Coordinator has been given sufficient advance notice.

SECTION 6 – PROGRAM INFORMATION

Citizens of the Urban County, public agencies, and other interested parties will be provided with reasonable and timely access to HUD funded program(s) information at public hearings/meetings and on an on-going basis as provided herein.

To facilitate access to HUD funded program(s) information as requested on an individual basis (apart from public hearings/meetings) or to respond to a request from a public hearing/meeting that is of a size or nature not readily available at such time, the Citizen Participation Coordinator will provide requested information directly (via electronic or hard copy) and/or make it available for review at an accessible location in Government Plaza.

Materials to be made available shall include, but are not necessarily limited to: the Citizen Participation Plan; Consolidated/Action Plan(s); Analysis of Impediments to Fair Housing Choice; records of public hearings; grant agreements; environmental review records; financial and procurement records; project design and construction specifications; labor standards records; performance and evaluation reports; other reports required by HUD; proposed and approved applications; written comments or complaints received and responses from the County; and copies of the applicable federal/state/local rules, regulations, policies, requirements, and procedures governing HUD funded programs. As required by 24 CFR 91.105(h), such information will be available for the preceding five (5) years.

In no case shall the County disclose any information concerning the financial status of any program participant(s) which may be required to document program eligibility or benefit. Furthermore, the County shall not disclose any information which may, in the opinion of the Citizen Participation Coordinator, be deemed of a confidential

¹³ Reasonable accommodation includes a consideration of cost as well as other appropriate and allowable considerations.

nature. Release of information will be subject to both the Privacy Act of 1974, as amended, and redaction of any personally identifiable information, if applicable.

SECTION 7 – PROCEDURES FOR COMMENTS, OBJECTIONS, AND COMPLAINTS

The public hearings, as described in this Citizen Participation Plan, are designed to facilitate public participation in all phases of the HUD funded program(s) process. Citizens and others identified herein are encouraged to submit their views and proposals on all aspects of HUD funded program(s) at public hearings. However, to ensure that citizens and others identified herein are given the opportunity to assess and comment on a continuous basis, citizens and others identified herein may, at any time, submit written comments or complaints to the Citizen Participation Coordinator.

Any citizen or others identified herein desiring to comment or object to any phase of the planning, development, or approval of HUD funded program(s), or to the implementation of any such program, should submit comments or objections in writing to the Citizen Participation Coordinator at Mobile Government Plaza, South Tower, 8th Floor, 205 Government Street, Mobile, AL 36644. Should, after a reasonable period, a party believe that their comment or complaint has not been properly addressed or considered, then the aggrieved may appeal their case to the President of the County Commission.

The Commission shall make every effort to provide written responses to citizen proposals or complaints within fifteen (15) working days of the receipt of such comments or complaints, where practicable. Should the County be unable to sufficiently resolve an objection or complaint, it may be forwarded by the aggrieved party to the U.S. Department of Housing and Urban Development.

While citizens may contact HUD directly to register comments, objections, or complaints concerning the County's HUD funded program(s), they are encouraged, to attempt to resolve any complaints at the local level as outlined above prior to contacting HUD.

All comments or complaints submitted to HUD shall be addressed in writing to:

Director, Community Planning and Development Division
U.S. Department of Housing and Urban Development
Medical Forum Building, Suite 900
950 22nd Street, North
Birmingham, AL 35203-5302

Records of all comments, objections, and/or complaints by citizens concerning the County's HUD funded program(s) and subsequent action taken in response to those comments shall be maintained on file at the County and shall be made available for public inspection upon request.

SECTION 8 – SECTION 504, REHABILITATION ACT OF 1973, AS AMENDED, GRIEVANCE PROCEDURES

Section 504 of the Rehabilitation Act of 1973, as amended, provides that no qualified disabled person shall solely on the basis of disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

As such, the Mobile County Commission is required to do the following:

1. Assess its efforts to comply with applicable Section 504 requirements and set forth and maintain a plan for appropriate corrective actions.
2. Remove physical obstructions to disabled persons from public buildings and facilities.
3. Take special needs of disabled persons into consideration in the design and construction of federally assisted programs/projects.
4. Disseminate program information to interested beneficiaries and members of the general public who are disabled.
5. Ensure that employment and personnel practices do not discriminate against qualified disabled job applicants and employees, and that they are not denied or restricted from employment opportunities based on the need to make reasonable accommodations to the workplace.
6. Provide disabled persons' access and participation in all services and/or activities of the governing body of Mobile County.

Whether members of the general public or employees of Mobile County qualify as disabled persons, they can be assured that Mobile County is committed to complying with the above requirements and the regulations set forth under Section 504, 24 CFR, Part 8, as well as the Americans with Disabilities Act as it applies to County buildings, operations, and practices. In the event individuals or organizations claim that Mobile County has discriminated against qualified disabled persons solely on the basis of being disabled, the following procedures have been established to assure those grievances are addressed in a timely, fair, equitable, and competent manner.

1. Written grievances shall be first filed with Martha Durant (Chief Staff Attorney) who serves as the ADA Compliance Coordinator (which encompasses Section 504). Should such grievances be related to an

employee of Mobile County, these will need to be filed with Finise Howard-Burnett, Human Resources Officer. In both instances, grievances can be delivered to identified personnel at Government Plaza, 205 Government Street, Mobile, AL 36644.

2. The County Administrator or his designated representative shall investigate the written complaint and prepare a written response to the complainant within fifteen (15) working days of receipt of the complaint. The County's response shall contain as a minimum, the findings of fact in the matter, any corrective action that the County may undertake and, if applicable, an explanation of why no corrective action is deemed appropriate or necessary on the part of the County.
3. In the event that the persons or organizations filing the complaint are not in agreement with the County's response, a written appeal may be filed directly with the County Commission. The Commission may schedule a hearing on the matter either as a special meeting or as part of a regularly scheduled Commission meeting. The Commission's final decision will be made known to the complainant in a written response within fifteen (15) working days of the appeal hearing.

SECTION 9 – AMENDMENTS TO THE CITIZEN PARTICIPATION PLAN

The County may, from time to time, modify the provisions outlined herein through amendment to the Citizen Participation Plan. It shall be the policy of the County to periodically review and discuss the effectiveness of its Citizen Participation Plan. To this end, the Citizen Participation Plan will be discussed at public meetings/hearings held in conjunction with HUD funded program(s), and potential amendments will be reviewed at this time.

Consistent with 24 CFR 91.105 (a)(3), amendments to the Citizen Participation Plan will be made as necessary to include new or revised HUD requirements and/or to address identified issues that will improve overall effectiveness. All substantial amendments shall be approved by resolution of the County Commission and shall be incorporated into the Citizen Participation Plan upon expiration of a 10-day public comment period (commencing on the date of publication). The notice for the public comment period will be accomplished by publishing in one or more local newspaper(s) of general circulation, as defined in the Code of Alabama Title 6, Section 6-8-60, and/or by including electronic notice on the Grants Department website. Additional notifications (as deemed appropriate) may also be provided to others, including individuals, groups, organizations, and members of the Urban County using

social media and/or electronic mail. The County may waive public comment requirements when HUD provides waivers and in cases where unusual circumstances (defined at Section 5.2 herein) justify alternative means of notifying the general public. In such situations, shorter notice may be given (subject to HUD waiver provisions and/or local determination of what constitutes reasonable notice as per Section 5.2 herein) and public notices posted using electronic media only (e.g., website posting and potentially social media and/or electronic mail).

Minor amendments (those incorporating HUD regulatory revisions or minor administrative changes) must also be approved by the Commission, but are not subject to the 10-day public comment period.