

REPORTING

The City is required to fulfill its reporting obligations to HUD as specified in the CDBG rules and regulations outlined in [Chapter 69 of 42 U.S.C.](#) and [Part 570 of the Code of Federal Regulations](#).

1. CONSOLIDATED PLAN

The City is required to prepare a five (5) year plan that includes the first (1st) of five (5) annual action plans. This plan is meant to outline all potential needs, resources, priorities, and proposed activities carried out by the City within the specified five (5) year period. Each Consolidated Plan shall have a minimum of the following:

1. A description of the lead agency or entity responsible for overseeing the development of the Consolidated Plan and a description of the process undertaken to develop the plan.
2. A housing and homeless needs assessment.
3. A housing market analysis
4. A strategic plan
5. A one (1) year annual action plan.

The plan shall be submitted in IDIS for HUD's review and approval and shall follow the regulations set forth by HUD. These regulations can be found in Chapter 2 of the Basically CDBG Guidance Book issued by HUD and in [Part 570 of the Code of Federal Regulations](#).

Citizen Participation

The Consolidated Plan is required to have a citizen participation component. In order to meet this requirement, the City shall hold two (2) public meetings prior to its review/approval from HUD. One (1) meeting shall be held during afternoon hours at the Natatorium or other city owned building and the second (2nd) meeting shall be held during the City Council meeting in which council representatives approve the Mayor to submit said Plan. The CDBG Entitlement Administrator shall prepare legislation to submit to the Law Department regarding the same.

The CDBG Entitlement Administrator shall publish a notice of the two (2) public meeting, along with a summary of the Plan to a newspaper of general circulation at least fourteen (14) calendar days in advance of the proposed meeting dates. He/she shall also post the Plan to the City's website, forward the same to the Akron Urban League, and have the NECCO department conduct a social media campaign notifying residents of the same. In addition, the CDBG Entitlement Administrator shall drop off a copy of the Plan to the local library and have a paper copy on hand at City Hall for those wishing to view it in a traditional format.

The City, at a minimum, shall provide a thirty (30) day public comment period. All public comments received should be considered and included in the Consolidated Plan.

The Consolidated Plan shall also include the FONSI for all five (5) program years covered by the Plan.

The Consolidated Plan is due to HUD 45 days before the start of the grantee's program year. HUD will not accept a submission earlier than November 15 or later than August 16 of the Federal fiscal year for which the grant funds are appropriated.

Minor vs. Substantial Amendments

Minor amendments are those that are not considered substantial in nature and pertain to minor administrative modifications of the programs and do not require citizen participation.

A substantial amendment includes changes in the use of CDBG funds from one eligible activity to another, additions of activities not previously mentioned in the Consolidated Plan, and/or change of purpose, scope, location or beneficiaries of an activity.

The City is required to have a minimum of a thirty (30) day comment period on substantial amendments to the City's Consolidated Plan. The CDBG Entitlement Administrator shall publish a notice of the public comment period in a newspaper of general circulation, forward the same to the Akron Urban League, and post it to the City's website. The CDBG Entitlement Administrator shall also work with the City's NECCO department to conduct a social media campaign regarding the same.

Following the thirty (30) day comment period, the City is required to hold a public hearing to discuss changes to the City's Consolidated Plan and answer questions regarding the plan. The CDBG Entitlement Administrator shall publish a notice of such public hearing at least fourteen (14) days in advance, along with a summary of the amendments of the Consolidated Plan in a newspaper of general circulation, forward the same to the Akron Urban League, and post it to the City's website. He/she shall also work with the City's NECCO department to issue a social media campaign regarding the same.

The CDBG Entitlement Administrator shall prepare a summary of all comments received in writing and, in cases where a citizens' views are not accepted, provide a reason for the decision. All comments shall be attached to the substantial amendment and be submitted in IDIS for HUD's review and approval.

2. ANNUAL ACTION PLAN

The City is required to prepare an annual action plan that outlines the activities to be carried out during that specific program year. All activities MUST be in the approved Consolidated Plan.

The Plan shall be submitted in IDIS for HUD's review and approval and shall follow the regulations set forth by HUD. These regulations can be found in Chapter 2 of Basically CDBG and in [Part 570 of the Code of Federal Regulations](#).

Citizen Participation

The Annual Action Plan is required to have a citizen participation component. In order to meet this requirement, the City shall hold two (2) public meetings prior to its review/approval from

HUD. One (1) meeting shall be held during afternoon hours at the Natatorium or other city owned building and the second (2nd) meeting shall be held during the City Council meeting in which council representatives approve the Mayor to submit said Plan. The CDBG Entitlement Administrator shall prepare legislation to submit to the Law Department regarding the same.

The CDBG Entitlement Administrator shall publish a notice of the two (2) public meeting, along with a summary of the Plan to a newspaper of general circulation. He/she shall also post the Plan to the City's website, forward the same to the Akron Urban League, and have the NECCO department conduct a social media campaign notifying residents of the same. In addition, the CDBG Entitlement Administrator shall drop off a copy of the Plan to the local library and have a paper copy on hand at City Hall for those wishing to view it in a traditional format.

The City, at a minimum, shall provide a thirty (30) day public comment period. All public comments received should be reviewed and included in the public comment section of the Annual Action Plan.

No FONSI is required as it is submitted in the Consolidated Plan for all five (5) years of the City's Consolidated Plan.

The Annual Action Plan is due to HUD no sooner than the announcement of the yearly allocation by HUD and no later than August 15 of the program year.

Minor amendments are those that are not considered substantial in nature and pertain to minor administrative modifications of the programs and do not require citizen participation.

A substantial amendment includes changes in the use of CDBG funds from one eligible activity to another, additions of activities not previously mentioned in the Annual Action Plan, and/or change of purpose, scope, location or beneficiaries of an activity.

The City is required to have a minimum of a thirty (30) day comment period on substantial amendments to the City's Annual Action Plan. The CDBG Entitlement Administrator shall publish a notice of the public comment period in a newspaper of general circulation, forward the same to the Akron Urban League, and post it to the City's website. The CDBG Entitlement Administrator shall also work with the City's NECCO department to issue a social media campaign regarding the same.

Following the thirty (30) day comment period, the City is required to hold a public hearing to discuss and answer questions regarding the amendments to the City's Annual Action Plan. The CDBG Entitlement Administrator shall publish a notice of public hearing at least fourteen (14) days in advance, along with a summary of the amendments to the Annual Action Plan in a newspaper of General Circulation, send it to the Akron Urban League, and post it to the City's website. He/she shall also work with the City's NECCO department to conduct a social media campaign regarding the same.

The CDBG Entitlement Administrator shall prepare a summary of all comments received in writing and, in cases where a citizens' comments are not accepted, provide a reason for the decision. All comments shall be attached to the substantial amendment and be submitted in IDIS for HUD's review and approval.

3. CAPER

The City is required to prepare an annual report to submit to HUD that details its accomplishments. This report is due ninety (90) days after the completion of program year.

The CAPER shall include the following:

1. Assessment of the City's Five (5) year goals and objectives. This should include the grantee's progress toward meeting their strategic plan and high priority needs as stated in the Consolidated Plan.
2. Affirmatively Furthering Fair Housing- a description of the City's efforts towards meeting the fair housing needs, including an analysis of impediments to fair housing choice, summary of impediments and actions taken by the municipality.
3. Affordable Housing- evaluation of the progress toward meetings the City's objectives toward the provision of affordable housing by income level.
4. Continuum of Care- evaluation of the City's progress toward meetings its objectives toward homeless and special needs populations.
5. Other Actions the City has taken to overcoming barriers to affordable housing, community development needs, improving public housing initiatives, reduction and elimination of lead-based paint hazards and efforts to reduce those living below the poverty levels as indicated by the annual update of the area median income thresholds.
6. Leverage of Resources- description of other public and private resources used toward the provision of affordable housing and community development activities.
7. Citizen Participation Comments- description of any public comments received in regard to CDBG programs.
8. Self-evaluation- a description of the impact of the programs and projects funded through CDBG had on the community.

The City must also address the following narrative elements in the CAPER:

1. The relationship of the use of its CDBG funds to priorities, needs, goals, and specific objectives outlined in the Consolidated Plan.
2. Nature and reasons for any changes in CDBG objectives
3. Efforts of the grantee to carry out planned activities described in its annual Action Plan.
4. If applicable, why CDBG funding did not meet one of the three national objectives.
5. Activities involving acquisition, relocation, and displacement.
6. Economic development activities that do not result in jobs for low-to-moderate income individuals.
7. Description of presumed limited clientele activities.
8. Description of activities generating program income

9. Description of Minor Housing Rehabilitation Activities.

10. If applicable, progress against neighborhood revitalization strategy area benchmarks.

Although the City does not have to include the following reports in its CAPER submission, it is obligated to maintain the following records on an annual basis:

1. Summary of Accomplishments Report- this shall include data on CDBG activity counts and disbursements by priority need categories.
2. Consolidated Annual Performance Evaluation – this shall detail the progress that the City has seen with the implementation of the projects identified in its Annual Action Plan.
3. Financial Summary Report- this shall include the obligations and expenditures for the program year and determine the percentage of funding for LMI activities, planning and administration, and public services
4. Summary of Activities- this shall include the status, accomplishments, and expenditures for each activity open during the program year.
5. Rehabilitation Activities- this shall include each housing rehabilitation activity, along with the amount expended, completed LMI units, and occupied LMI units.

Citizen Participation

The City is required to have a minimum of a fifteen (15) day public comment period on the City's CAPER prior to its submittal to HUD. The CDBG Entitlement Administrator shall publish a notice along with a summary of the CAPER in a newspaper of General Circulation, forward the same to the Akron Urban League, and post it to the City's website. He/she shall also work with the City's NECCO department to conduct a social media campaign regarding the same. The CDBG Entitlement Administrator shall prepare legislation to submit to the Law Department regarding the same.

The CAPER shall be submitted in IDIS for HUD's review/approval.