

COMMUNITY PARTICIPATION PLAN

As required by 24 CFR 91.105

Rev. April 11, 2024

A Community Participation Plan sets forth the policies and procedures for community participation in the development of the five-year Consolidated Plan, annual action plans and annual end of year reports. The Community Participation Plan is designed to encourage participation by low- and moderate-income persons, particularly those living in areas where Community Development Block Grant (CDBG) funds will be used, as well as minorities, persons with disabilities, residents of public housing and other interested persons.

Salem's first Community Participation Plan was adopted in March, 2000, following a training session conducted by the Coalition for Low-Income Community Development, Inc. This plan is based on information collected during that training, as well as the following sources: U.S. Department of Housing and Urban Development (HUD) or National Community Development Association (NCDA) sponsored trainings/meetings; 24 CFR 91.105 in the Consolidated Plan Regulations; and recommendations from other communities and HUD representatives. It was revised in March, 2005, October, 2009, March, 2014 and July, 2019. During the COVID-19 federally declared disaster, the Community Participation Plan was amended in response to supplemental funding, flexibilities and waivers from HUD.

The Community Participation Plan is typically reviewed and updated prior to the start of the five-year Consolidated Plan process. A not less than fifteen-day comment period is advertised whenever the Community Participation Plan undergoes significant amendments.

For this version of the Community Participation Plan, a 15-day comment period was advertised on March 7, 2024.

The Community Participation Plan is arranged as follows:

1. Assessment of priority needs
 - a. Consolidated Plan
 - i. Factual Data Collection
 - ii. Community input
 - b. Action Plan
 - c. Affirmatively Furthering Fair Housing
2. Advertisement, location and format of public hearings & meetings
3. Preparation of the Plan
4. Availability of Documents
5. Draft plans - Consideration of comments
6. Application for Federal Funds Approval
7. Funding Requests
8. Technical Assistance
9. Action Plan Amendments
10. Consolidated Plan Amendments
11. Consolidated Annual Performance and Evaluation Report (CAPER)
12. Additional Efforts
13. Federally Declared Disasters
14. Complaints

The tasks outlined in this plan may be undertaken by staff of the City of Salem Department of Planning and Community Development or by a consultant hired during the Consolidated Plan process.

1. **ASSESSMENT OF PRIORITY NEEDS**

a. Consolidated Plan

Salem undertakes a housing and community development needs assessment every five years as part of the Consolidated Plan process in order to identify and prioritize the housing, community and economic development needs of the city's residents and develop proposed activities, as well as address proposed strategies and actions for affirmatively furthering fair housing. The plan is submitted to the U.S. Department of Housing and Urban Development (HUD) through its IDIS system. The City of Peabody is the lead community, responsible for submitting the Consolidated Plan in IDIS on behalf of the 30 communities within the North Shore HOME Consortium.

The City specifically targets the following groups for intensive outreach and involvement in the development of the Consolidated Plan:

- Low- and moderate-income persons and residents living in predominantly low- and moderate-income neighborhoods;
- Persons with HIV/AIDS and their families, and HIV/AIDS service providers;
- Homeless and homeless service providers;
- Senior citizens and senior service providers;
- Minorities;
- Non-English and limited English speaking residents;
- Residents of public assisted housing, Resident Advisory Board and the Salem Housing Authority;
- Community Development Corporations and residents served;
- Mental & physical health agencies;
- Substance abuse prevention agencies;
- Salem Health Department;
- Youth advocacy groups and providers of services to children;
- Persons with disabilities and service providers for persons with disabilities;
- Persons living in areas designated as revitalization or slum/blight areas;
- Economic development/job creation agencies;
- Banks, realtors, developers and other community businesses;
- Adjacent units of general local government and local and regional government agencies;
- Local agencies with metropolitan-wide planning and transportation responsibilities;
- Broadband internet service providers and 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;
- Continuums of Care, philanthropic organizations, community-based and faith-based organizations;
- Community-based and regionally-based organizations that represent protected class members or enforce fair housing laws; and
- Other local and regional institutions and non-profit organizations.

Specific types of data to be collected through the needs assessment shall include:

- Elderly and non-elderly homeowner and renter needs;
- Special needs of the elderly, frail elderly, persons with alcohol/other drug addiction, disabled persons, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families);
- Homeless needs for individuals and persons in families with children including;

- Needs for emergency, transitional and permanent housing;
- Estimated supportive services slots for job training, case management, substance abuse treatment, mental health care, housing placement and life skills training;
- Estimated needs of chronic substance abusers, seriously mentally ill, dually-diagnosed, veterans, persons with HIV/AIDS, victims of substance abuse and youth;
- Community needs including anti-crime programs, economic development, infrastructure, public facilities, public services, senior programs and youth programs;
- Poverty;
- State and local health and child welfare agency data on housing units in which children have been identified as lead poisoned; and
- Barriers to affordable housing.

Factual data collection and community input methods will include:

i. Factual data collection

Factual data to be used and incorporated into the needs assessment will include information found in the most recent U.S. Census and other available publications including, but not limited to, Home Mortgage Disclosure Act, State Unemployment Insurance, property assessments, building permits, National Low Income Housing Coalition’s annual Out of Reach report, Dun and Bradstreet, real estate transactions and the N. S. Home Consortium (Analysis to Impediments, Continuum of Care and any available Consolidated Plan data), the WarrenGroup data and foreclosures.com data.

ii. Community input

Whenever possible, community participation will include presentations at:

- Public hearing(s);
- Neighborhood Association meeting(s);
- Salem Housing Authority Tenant’s Association;
- Commission on Disabilities;
- Affordable Housing Trust; and
- Focus groups (i.e. Economic Development, social service groups).

Community participation will be encouraged through a variety of methods, including but not limited to:

- Legal advertisement in the Salem News;
- Posted notices at the Salem Public Library, Salem Council on Aging, Salem Housing Authority, Salem City Hall and Salem City Hall Annex;
- Notices sent to social service agencies, civic groups, the N.S. Home Consortium, as well as other Salem locations;
- Salem H.O.P.E. distribution list;
- Notification to the Salem City Council;
- The City’s official website, www.salem.com;
- Press release to local media; and
- Salem Access Television community calendar.

Community Participation will also include interviews with representatives of various local agencies, such as but not be limited to, those serving the elderly, non-English or limited English speaking, homeless, substance abusers, veterans, youth, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), and agencies that provide job training and placement, Lifebridge, the North Shore CDC,

Salem Council on Aging, Salem Housing Authority, Salem Health Department, municipal inspection service departments (i.e. building & fire) and local businesses.

Alternative public involvement techniques may be utilized, such as internet-based surveys, or at alternative locations, such as a community meal offering at a neighborhood school.

b. Annual Action Plan

At the commencement of the Annual Action Plan process (during each of the four years between the Consolidated Plan process), community participation efforts will be undertaken in order to evaluate how Salem’s housing and community development needs and priorities have changed since the completion of the prior Consolidated Plan and to assess any new information received. Community participation will be encouraged through a public hearing, legal advertisements in the Salem News, Salem Access Television notice and posted flyers at the Salem Public Library, Salem City Hall, Salem City Hall Annex, www.salem.com and the Salem Housing Authority, as well as various email notifications.

c. Affirmatively Furthering Fair Housing (AFFH)

An Analysis of Impediments (AI) was historically completed by the North Shore HOME Consortium, to which the City of Salem participated. This well-established AI obligation and planning process continued in place until September, 2020. Since 2015 several rules have been proposed, established and/or repealed by HUD. The current interim rule, effective July 31, 2021, reinstates the regulatory requirement that program participants certify that they take meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. While this interim final rule does not require program participants to undertake any specific type of fair housing planning to support their certifications, it provides notice that HUD will once again offer technical support, guidance, resources and other assistance to jurisdictions. At this time, the City of Salem plans to utilize the same community participation strategies as outlined for the Consolidated Plan in order to assess disparities in housing needs, access to opportunity and compliance with civil rights and fair housing laws. Should HUD implement further procedures, the City of Salem will implement and comply.

2. ADVERTISEMENT, LOCATION AND FORMAT OF PUBLIC HEARINGS & MEETINGS

Based on the 2022 SCS 5-Year Estimates from the U.S. Census, 12.5% of Salem’s population speak Spanish and another 9.2% speak another language other than English. Language assistance to non-English speaking residents is available upon request.

Public hearings will be advertised in the Salem News, on Salem Access Television, through English/Spanish notices posted at the Salem Public Library, Salem Housing Authority, Salem Council on Aging, Salem City Hall and Salem City Hall Annex, and on www.salem.com. Salem News legal ads and SATV ads shall be provided to these media approximately two weeks prior to the hearing. In addition, advertisement may include notices provided to the Salem HOPE distribution list of non-profit agencies and/or press releases distributed to local print agencies. Public hearings will be held at 98 Washington Street, which is accessible to people with disabilities and located on or near the bus lines and MBTA train station. Whenever possible, a Spanish translator will be present. These meetings may also be hybrid (both virtual and in-person attendees may participate).

One public hearing will be held at least 30 days prior to the completion of the Draft Consolidated Plan or Annual Action Plan (usually at the start of the annual process). During this hearing, persons will be given opportunity to review prior year program performance. One public hearing will be held at least 30 days prior to the submission of the final Consolidated Plan or Annual Action Plan.

Forums and focus group meetings will be held at various locations and times appropriate to the type of group, population or neighborhood. Forums, focus groups and other meetings may be advertised in the Salem News, on Salem Access Television, through notices posted at the Salem Public Library, Salem Housing Authority, Salem Council on Aging, Salem City Hall and Salem City Hall Annex, and on www.salem.com. In addition, advertisement may include notices provided to the Salem HOPE distribution list of nonprofit agencies, and/or press releases distributed to local print agencies. Forums and focus groups targeted to specific neighborhoods may include distribution of flyers to those targeted populations. Such flyers intended for Point Neighborhood residents shall also be provided in Spanish. Neighborhood meetings in the Point Neighborhood will be conducted with bilingual staff or translators.

Senior transportation is available by contacting the Transportation Coordinator of the Salem Council on Aging at least two days in advance. Persons with other special needs should contact the DPCD for reasonable accommodation and provide ample time for the request to be arranged.

3. PREPARATION OF THE PLAN

Following the Needs Assessment, the Consolidated Plan and/or Annual Action Plan will be drafted. The Draft will set priorities and will provide for the development of funding decisions based on plan priorities. Included in the plan will be the required HUD forms, data, maps, narratives, illustrations and photographs. The plan will include the amount of assistance that Salem expects to receive, including grant funds and program income, the range of activities that may be undertaken and an estimate of the low and moderate income persons to benefit from the proposed activities.

4. AVAILABILITY OF DOCUMENTS

All public documents are available for viewing at the Department of Planning & Community Development (DPCD). A copy of the Community Participation Plan, Draft and Final Consolidated Plan, Draft and Final Annual Action Plan, and Draft and Final Consolidated Annual Performance and Evaluation Report (CAPER) will be provided to the Salem Public Library and the Salem Housing Authority. A notice, that includes a subject, purpose and summary of the document, its availability, its comment period, and the time/date of any public hearings or meetings, will be published in the Salem News. Additional notice will be posted at Salem City Hall, Salem City Hall Annex, the Salem Public Library, the Salem Council on Aging and the Salem Housing Authority.

Copies of any CDBG or HOME related public document exceeding 10 pages will be provided upon request at a cost of 20¢ per page, free for documents under 10 pages. Full copies of documents are available free by e-mail, as well as on computer disks when the disks are provided by the requester. In addition, copies of these documents will be available for download at no charge on www.salem.com. A limited number of free copies of draft plans (i.e. Consolidated Plan, Action Plan) will be available at related public hearings. Final copies of all plans and reports shall be provided to HUD.

Residents of the community, public agencies, and other interested parties may request access to information and records relating to the Consolidated Plan or any activities assisted with CDBG or HOME funds for the preceding 5 years by written request and such requests shall receive a response within ten (10) days pursuant to the Massachusetts Public Records Law.

5. DRAFT PLANS – CONSIDERATION OF COMMENTS

All comments received will be reviewed by the Director of the Department of Planning and Community Development, Deputy Director and the city’s consultant (if one has been engaged), but may also be reviewed by the Mayor. The City of Salem will consider any comments or views received in writing, or orally at any public hearing in preparing the final Consolidated Plan. All comments suggesting amendments to the drafts that are considered reasonable, feasible and consistent with HUD regulations will be incorporated into the final plans. A summary of public comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be included in the final Consolidated Plan.

6. APPLICATION FOR FEDERAL FUNDS APPROVAL

Prior to submission to HUD, copies of the Consolidated Plan and/or Annual Action Plan will be provided to the City Council, along with a copy of the Application for Federal Funds. The City Council will vote to approve the submission of the Application for Federal Funds. The Application for Federal Funds will be signed by the Mayor and included in the submittal to HUD.

7. FUNDING REQUESTS

Annually, the City of Salem will issue a Request for Applications (RFA) from non-profit agencies to undertake need programs. RFAs issued may be for public services, housing and/or economic development funding requests. Awards are conditional upon available funding.

Funding assistance for Public Services is awarded on a competitive basis in annual funding rounds, which are advertised in the Salem News. Guidelines for the Public Services Program are provided in a separate document. A list of proposals received will be included in the Draft Action Plan for the 30-day comment period. The DPCD’s recommendations for awards are provided to the Mayor for approval.

Applications for city-administered programs (First Time Homebuyers Loan Program, Housing Rehabilitation Loan Program and Economic Development Loan Program) are available on www.salem.com and may be submitted at any time. Guidelines for these programs are provided on the website. Approval of these loans is contingent upon meeting eligibility requirements and the availability of funding. Applications may be placed on a waiting list, if necessary, to accommodate current staffing or funding levels.

Persons, businesses or agencies seeking assistance for other types of assistance (i.e. housing development, or redevelopment) should contact the DPCD.

8. TECHNICAL ASSISTANCE

Individuals, businesses or agencies needing technical assistance to apply for CDBG or HOME funds or for other assistance regarding CDBG or HOME funded programs may contact the DPCD for consultation.

First Time Homebuyer and Housing Rehabilitation Loan Program technical assistance will be provided by DPCD housing staff. New applicants should meet with DPCD housing staff after reviewing the application guidelines on www.salem.com .

Business establishment and business loan application assistance will be provided by the economic development planner. New applicants should meet with the economic development planner after reviewing the application guidelines on www.salem.com.

Assistance to public service agencies will be provided by the Deputy Director or the Housing Coordinator. Agencies receiving CDBG public services funding are required to attend a brief training meeting prior to the start of the funded program.

All other questions or requests for information or assistance should be directed to the Community Development Director or Deputy Director.

9. ACTION PLAN AMENDMENTS

Amendments proposed for the HUD-approved Annual Action Plan will be evaluated and addressed as follows:

Minor amendments: Minor amendments will be undertaken as necessary with no public comment. Examples of minor amendments include but are not limited to:

- Increase or decrease of the budgeted funds for an existing activity in the Annual Action Plan;
- Cancellation of an activity that was determined ineligible, infeasible or no longer a priority;
- Addition of emergency activities (interim assistance);
- Addition of an IDIS AP-35 project that meets the established goals of the Annual Action Plan and whose proposed budget is \$50,000 or under; or
- Transfer of funding (i.e. change of use) from one existing eligible activity to another.

Substantial amendments: Legal advertisements will be placed in the Salem News for all significant amendments, providing 15-day comment period. Examples of significant amendments include but are not limited to:

- Addition of an IDIS AP-35 project that meets the established goals of the Annual Action Plan with a proposed budget of \$50,001 or over; or
- Addition of an IDIS AP-35 project, whose proposed budget is under \$200,000, that has been determined to be a new priority, but whose goal was not included in the original Annual Action Plan.

10. CONSOLIDATED PLAN AMENDMENTS

Amendments proposed for the HUD-approved Consolidated Plan will be informally reviewed by Community Development staff with staff of the North Shore HOME Consortium and/or HUD field office, after which a course of action for community participation will be determined. At a minimum, substantial amendments shall provide for a public hearing and shall allow for a period of not less than 30 days to receive public comment on the substantial amendment before the amendment is implemented. A substantial amendment to the Consolidated Plan shall include but not be limited to:

- Addition of a AP-20 goal that was not previously included in the plan;
- Addition of an AP-35 project whose proposed budget is over \$200,000;
- Addition of a Section 108 Loan Guarantee application for an activity not previously included in the plan.

The City of Salem will consider any comments or views received in writing, or orally at public hearings, if any, in preparing the substantial amendment to the Consolidated Plan. A summary of public comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the substantial amendment to the Consolidated Plan.

11. CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

The CAPER must be submitted to HUD within 90 days after the end of the program year (June 30th), providing a detailed description of CDBG and HOME funds used during the fiscal year and to what extent they benefited low and moderate income people. Legal notice of the availability of the draft CAPER and 15-day comment period is advertised in the Salem News and is posted at Salem City Hall and Salem City Hall Annex and on www.salem.com. The City of Salem will consider any comments or

views received in writing or orally at public hearings, if any, in preparing the CAPER. A summary of public comments shall be included in the final CAPER.

12. **ADDITIONAL EFFORTS**

Community participation in CDBG activities is not limited to the formalized procedures noted above. Various CDBG activities include separate public comment opportunities, as well as public participation such as providing neighborhood input on the re-design of a public park. In addition, City administrators (Mayor, City Councilors and/or DPCD staff) are often in attendance at various neighborhood meetings where needs and proposed or planned activities are discussed. City representatives are available to meet with residents and business or agency representatives on an individual basis to receive input on needs and ideas for CDBG activities.

Additionally, there are various organizations, committees and groups from which input is gathered. These are particularly important forums where one voice may represent many individuals or population groups. Included are Salem H.O.P.E., the Commission for Disabilities, Neighborhood Improvement Advisory Council, the Salem Partnership, Salem Main Streets Initiative and the Salem Chamber of Commerce:

- a. **Salem H.O.P.E.:** Salem H.O.P.E. (Human Organization Partnership Effort) is a networking group of human service agencies that serve Salem residents. Salem H.O.P.E. provides a distribution list for agencies to share events, programs, job opportunities and other information . It provides an opportunity for agencies to learn about the services being provided by other agencies in order to fill in gaps, coordinate efforts and avoid duplication of services. Agencies wishing to be included on the Salem H.O.P.E. distribution list should contact the Assistant Community Development Director.
- b. **Commission on Disabilities:** The Commission on Disabilities is a Mayor-appointed, City Council- confirmed board whose seven members meet monthly to advise the City on issues relative to persons with disabilities.
- c. **Neighborhood Improvement Advisory Council:** The Neighborhood Improvement Advisory Council works to identify and review issues that affect Salem neighborhoods and works with the City to address them and improve the overall quality of life. NIAC is comprised of the President (or designee) of each neighborhood organization within the City of Salem.
- d. **Salem Partnership:** The Salem Partnership is a public/private sector coalition of local leaders who contribute time, energy and special resources to revitalize Salem. The Salem Partnership sponsors, supports and encourages the creation of programs and events that help promote new business development, the growth of Salem's tourist industry and unity within the community. The DPCD's Director is on the Executive Committee of the Salem Partnership.
- e. **Salem Main Streets Initiative:** The Salem Main Streets Initiative is a preservation-based, volunteer-driven strategy for downtown and neighborhood retail business revitalization. The mission of the Salem Main Streets Initiative is to help plan and direct those activities that preserve, develop and enhance the economic, social and cultural quality of the city's downtown and neighborhood commercial districts. A representative of the DPCD attends Main Streets board meetings and various subcommittee meetings.
- f. **Salem Chamber of Commerce:** The Salem Chamber of Commerce is an independent association of business and professional people which offers business referrals, networking, participation in cooperative business building events, updates on local business issues through a monthly newsletter and breakfast meetings. The DPCD's Director is a member of the Chamber's Board of Directors.

To keep the public informed of CDBG activities, the City of Salem periodically advertises the availability of loan funds, as well as publicizes project- specific public meetings on www.salem.com and through press releases and/or flyers for specific CDBG assisted activities.

The City of Salem makes every effort to minimize displacement of persons and to assist any persons displaced. A copy of the City of Salem's Relocation Assistance Policy is available at the DPCD.

13. FEDERALLY DECLARED DISASTERS

During a Federally declared disaster (such as COVID-19), HUD may make available supplemental funding, flexibilities and/or waivers in order to prevent, prepare for or respond to the disaster. The City of Salem will implement all such resources as deemed appropriate. Examples might include reduced public notice, reduced public comment periods or virtual-only meetings.

In this regard, in addition to planned activities that benefit low and moderate income persons, or that aid in the prevention or elimination of slums or blight, Salem may undertake activities to meet urgent, emergency needs. CDBG and/or HOME funds may be reprogrammed to activities to address those needs, including housing.

15. COMPLAINTS

Complaints should be addressed to the Director of Planning and Community Development, City of Salem, 98 Washington Street, Salem, MA 01970, 978 619-5685. The City of Salem will provide a written response to written complaints within 15 working days, where practicable.