



# CITIZEN PARTICIPATION PLAN

---

CITY OF LIMA, OHIO  
Department of Housing and Neighborhoods

**CITY OF LIMA  
CITIZEN PARTICIPATION PLAN**

**TABLE OF CONTENTS**

**I. INTRODUCTION ..... 2**

**II. PURPOSE AND INTENT ..... 2**

**III. CITIZENS ADVISORY COMMITTEE ..... 3**

**IV. PROGRAM PROPOSALS ..... 5**

**V. ADMINISTRATION ..... 6**

**VI. TECHNICAL ASSISTANCE ..... 6**

**VII. PUBLIC COMMENT PERIOD ..... 7**

- Consolidated Plan ..... 7
- Annual Action Plan ..... 7
- Consolidated Annual Performance Report (CAPER) ..... 7
- Substantial Amendments ..... 8
- Assessment of Fair Housing ..... 8

**VIII. PUBLIC HEARINGS ..... 8**

- Consolidated Plan ..... 8
- Annual Action Plan ..... 8
- Substantial Amendments ..... 9
- Assessment of Fair Housing ..... 9

**IX. AVAILABILITY OF INFORMATION ..... 10**

**X. ACCESS TO RECORDS ..... 10**

**XI. PERSONS WITH DISABILITIES ..... 10**

**XII. NON-ENGLISH SPEAKING PERSONS ..... 11**

**XIII. COMPLAINT PROCEDURES ..... 11**

**XIV. DISPLACEMENT PROCEDURES ..... 11**

**XV. COMMONLY USED TERMS AND DEFINITIONS ..... 13**

# **CITY OF LIMA CITIZEN PARTICIPATION PLAN**

## **I. INTRODUCTION**

The City of Lima, as a U.S. Department of Housing and Urban Development (HUD) entitlement recipient, is required to have and implement a Citizen Participation Plan (CPP) for HUD-funded programs.

This CPP sets forth the policies and procedures for citizen involvement in the development of the Five-Year Consolidated Plan (ConPlan), Annual Action Plan, any substantial amendment and the Consolidated Annual Performance and Evaluation Report (CAPER) as required by HUD, 24 CFR Part 91, Subpart B and 24 CFR Part 5, Sections 5.150 – 5.152 for Affirmatively Furthering Fair Housing (AFFH) and any amendments thereafter, and any additional rules and or guidance from HUD for AFFH.

The Department of Housing and Neighborhoods (DHN) acts as the agent for the City of Lima to implement all aspects of the Citizen Participation Plan. Implementation is accomplished through consultation and direct citizen participation.

In preparing the Consolidated Plan and the Annual Action Plan, the DHN will consult with public and private agencies; state and other local government jurisdictions; the public housing authority; the local Continuum of Care (CoC); and other entities as appropriate.

## **II. PURPOSE AND INTENT**

Citizen participation is an integral part of the overall planning, evaluation, assessment and implementation process of the City of Lima's Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME), and any other applicable HUD grants. In order for the City to access these resources, it must prepare and submit a Consolidated Plan, Annual Action Plans and Consolidated Annual Performance and Evaluation Report (CAPER). These reports are developed using input from concerned citizens, community agencies and beneficiaries.

The purpose of the CPP is to provide citizens and beneficiaries with the information and mechanisms to allow for full participation. The City of Lima recognizes the importance of citizen participation and fully endorses citizen involvement in its housing and community development activities.

The Citizen Participation Plan will allow the City of Lima to:

- Provide citizens an opportunity to participate in the development of all Community Planning and Development (CPD) programs, set priorities, establish goals and comment on performance.

- Encourage the submission of comments and proposals (particularly by low- and moderate-income residents, including public housing residents; persons with disabilities and non-English speaking persons).
- Provide for timely responses to proposals and comments submitted.
- Schedule meetings and public hearings at times and locations that permit broad participation and attendance.
- Provide complete information regarding the City’s CDBG, HOME, and any other applicable HUD grants, relevant legislation and regulations, and other materials and documents as needed or requested to ensure knowledgeable citizen involvement.

It is the intent of this CPP that all citizen participation be conducted in an open manner with freedom of access for all interested persons.

### **III. CITIZENS ADVISORY COMMITTEE (CAC)**

The City of Lima places great emphasis on the public participation process in the allocation of federal funds and the evaluation of federally funded programs and encourages the active participation of Lima residents and community stakeholders in the annual federal funding allocation process, with a special emphasis on involving low- to moderate-income persons in the City. The City’s Citizens Advisory Committee (CAC) is the cornerstone of Lima’s citizen participation process.

- A. Purpose:** The purpose of the CAC is to review, prioritize, and make recommendations on funding requests submitted by Non-Profit Agencies according to standardized criteria that ensure proposed activities effectively address the housing and non-housing community development needs identified in the city’s Five Year Plan.
- B. Composition.** The CAC is a 17-member committee. 9 members are appointed by the Mayor to serve a maximum of two (2) two-year terms. 8 members are appointed by City Council to serve a maximum of (3) one-year terms. At least 3 Mayoral appointments must be low-to-moderate income residents of the City.
1. The City Council committee member seats serve as representatives of their respective wards. Each Council member is assigned one seat for his/her ward and is responsible for nominating a community member to his or her assigned seat. Nominees are then appointed by a majority vote of the City Council.
  2. The President of City Council shall also nominate a community member to serve as his/her representative. The nominee is then appointed by a majority vote of the City Council.
  3. Each committee member shall be a qualified elector of the City of Lima at the time of the appointment and during incumbency and have an interest in or knowledge of the community.
  4. No person shall serve on the committee if he or she has any decision-making authority in a community organization that applies for or receives funds through the community development block grant. Any participation by a

committee member as a decision-maker in such community organization must have ceased at least thirty (30) days prior to the time of appointment and may not occur during incumbency. Alternatively, any community organization with a decision-maker that is also a member of the committee shall not be entitled to receive funds through the community development block grant as long as the member continues to serve in both capacities. For purposes of this section, any person serving on the governance board, e.g., board of directors, of a community organization shall be deemed to have decision-making authority in that organization.

5. Elected officials may not serve on the committee.
6. Committee members serve without compensation.

**C. Responsibilities.** The CAC members' duties and responsibilities include reviewing applications, participating in interviews of applicants, and making recommendations to the Department of Housing and Neighborhoods regarding the annual allocation of the Community Development Block Grant (CDBG) and HOME funds.

1. CAC deliberations are guided by Lima's HUD-mandated Five-Year Consolidated Plan and Annual Action Plans, and are enriched by input from Lima's citizens, the Mayor, City Council, municipal departments, the Lima/Allen County Housing Consortium, the Continuum of Care (CoC), City boards and commissions, and non-profit organizations, among others. The CAC is charged with the responsibility of reviewing and researching community development needs and the Five-Year Consolidated Plan of the City of Lima.
2. The CAC reviews and prioritizes funding requests submitted by Lima-based non-profit agencies according to standardized criteria that ensure proposed activities effectively address the housing and non-housing community development needs identified in the City's Five-Year Plan, and according to available funding.
3. The CAC then makes recommendations to the Administration on which programs should be funded and at what level.
4. CAC allocation recommendations are forwarded to City Council for deliberation and approval by ordinance. Following Council approval these recommendations are incorporated into the City's Annual Action Plan for submission to HUD as the City's official request for CDBG and HOME funding for the upcoming fiscal year.
5. In order to effectively perform the duties of the CAC, members shall complete modules of online HUD training designated by the Director of the DHN.

**D. Meetings.**

1. **Generally:** All meeting of the CAC are open to the public and will be held in locations accessible to handicapped individuals. The CAC shall elect a Chairperson at its initial meeting to organize and conduct all future meetings; and a Secretary to record and distribute minutes of each meeting. At the conclusion of each meeting of the CAC, the public will be invited to speak. Each member of the public wishing to speak will be recognized and given

three (3) minutes to address the Committee. At the discretion of the Chairperson of the CAC, or a majority of its attending members, extended time may be granted for public comments.

2. **Minutes:** Minutes of the CAC are open to the public for inspection at the Department of Housing and Neighborhoods located on the 2<sup>nd</sup> Floor of the Lima Municipal Building at 50 Town Square, Lima, Ohio. Any person may receive the agenda or the minutes of the CAC.
3. **Regular Meetings:** The work of the CAC takes place over several evening meetings and must be completed by June 1 each year. The first regular meeting is mandatory and is designed to be a general organizational meeting for all CAC members with training on the purpose of the federal programs and distribution of committee members' notebooks. The second regular meeting is a training session for prospective applicants. CAC's third regular meeting is the first Public Hearing with a presentation on community data, resources, and programs. CAC's fourth regular meeting is the second Public Hearing. CAC's fifth regular meeting is the third Public Hearing. A schedule of presentations and a copy of each proposal received are part of the Committee Members notebooks.
4. **Public Hearings:** CAC holds three (3) public hearings: one on the Community Development needs and two to hear citizen comments on the funding proposals received. One of the two public hearings will be at a location within an area of concentration of Low-Income Persons. As noted above, the first public hearing is held during the second regular meeting.

CAC's second and third public hearings allow citizens the opportunity to comment on various community development needs and/or the Consolidated Plan along with proposals which have been submitted for the uses of various HUD funds. The Director of DHN or his/her designee may present comments at any and all public hearings. Following the public hearing, the Committee will discuss the proposals for the use of funds in relation to community needs. A written report is sent to the Mayor, the Director of Housing and Neighborhoods and Council.

Public hearings will be held before formal consideration of the Consolidated Plan and/or Annual Action Plans by Lima City Council.

Notice of public hearings will be publicized in the same manner as regular meetings of the Citizens Advisory Committee and in compliance with HUD regulations.

#### **IV. PROGRAM PROPOSALS.**

**A. Eligibility:** To be considered for these funds applicants must meet the following criterion:

1. 501(c)(3) incorporated non-profit or a for-profit organization with a Board of Directors and written bylaws
2. City of Lima-based or services to City residents

3. Show evidence of fiscal and administrative management capacity
4. Have a federal tax identification number
5. Possess a nine-digit Data Universal Numbering System (DUNS) number
6. Have no outstanding financial liabilities with the City of Lima

**B. CDBG Application Requirements:** The following documents must be submitted with any application for CDBG grant funding:

1. Completed CDBG application including a data-based statement of community need, a description of proposed activities, beneficiaries, intended outcomes and how they will be measured;
2. If a non-profit organization, a copy of the 501(c)(3) IRS Non-profit designation letter;
3. Copy of Current Certificate of Professional Liability Insurance;
4. Organization Chart;
5. Board of Director's List & Resumes;
6. Total Agency budget by Program/Activity;
7. Most recent audit or financial statement; and,
8. An application checklist.

Applicants must also defend their written proposals before the Committee. Presentations will be scheduled at the close of the application period.

## **V. PROGRAM ADMINISTRATION.**

Lima's DHN administers CDBG and HOME, including the annual citizen participation and allocation processes.

The DHN will provide staff support for the Committee and provide Committee members with a broad array of contemporary and historic information, data, and tools required for the responsible, transparent, effective allocation of federal resources in compliance with all applicable rules and regulations, and in accordance with the needs, goals and priorities established in the City's Five-Year Consolidated Plan.

## **VI. TECHNICAL ASSISTANCE**

The DHN will provide technical assistance, through training or consulting in the following areas:

- Development of proposals for interested parties (to be conducted following the announcement of funding availability but before development of the Annual Action Plan is completed);

- Federal requirements for compliance for those agencies and organizations selected to receive funding through the Consolidated Plan (to be conducted at the beginning of the funding year).
- The DHN will provide individual technical assistance upon request or at the direction of the director to groups representing persons of low- and moderate- income and to those agencies and organizations selected to receive funding through the Consolidated Plan. Requests for individual assistance should be made in writing with a reasonable amount of time to schedule and plan for the technical assistance.

## **VII. PUBLIC COMMENT PERIOD POLICIES & PROCEDURES**

The City of Lima ensures that the public has an opportunity to comment on its various plans. Before adoption of the Consolidated Plan, Annual Action Plan, CAPER and any substantial amendments, the DHN will make available to citizens, public agencies and other interested parties information that includes at least (1) the amount of assistance the City expects to receive (including HUD entitlement grant funds and program income) and (2) the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income.

**Consolidated Plan:** Any interested party or individual has 30 days after the first public hearing to comment on the Five-Year Consolidated Plan before its submission to HUD. Notices for the comment periods will be published in the local general circulation newspaper in advance of the comment period. Information will also be available on the City of Lima’s website and disseminated to subrecipients of HUD funding and key local service providers to reach a broader audience. Hard copies will also be made available at the Lima Public Library and DHN front desk for public review. News releases and Public Service Announcements will be sent to local media announcing the comment period and location of draft copies. Social media may be also used to disseminate information related to the comment period. A summary of all comments will be included within the final Consolidated Plan submitted to HUD. All comments will be considered.

**Annual Action Plan:** Any interested party or individual has 30 days after the first public hearing to comment on the Annual Action Plan before its submission to HUD. Notices for the comment periods will be published in the local general circulation newspaper and City of Lima web site in advance of the comment period. Information will also be available on the City of Lima’s website and disseminated to subrecipients of HUD funding and key local service providers to reach a broader audience. News releases and Public Service Announcements will be sent to local media announcing the comment period and location of draft copies. Social media may be also used to disseminate information related to the comment period. A summary of all comments will be included within the final Action Plan submitted to HUD. All comments will be considered.

**CAPER:** Any interested party or individual has fifteen (15) days to comment on the CAPER before its submission to HUD. Notices for the comment period will be published in the local general circulation newspaper and City of Lima web site in

advance of the comment period. Information will also be available on the City of Lima's website and disseminated to subrecipients of HUD funding and key local service providers to reach a broader audience. Hard copies will also be made available at the Lima Public Library and DHN front desk for public review. News releases and Public Service Announcements will be sent to local media announcing the comment period and location of draft copies. Social media may be also used to disseminate information related to the comment period. A summary of all comments received will be included within the final CAPER submitted to HUD. All comments will be considered.

**Substantial Amendments:** Any interested party or individual has thirty (30) days to comment on any substantial amendments to the Consolidated Plan or Action Plan before its submission to HUD, unless specifically waived by HUD. Notices for the comment periods will be published in the local general circulation newspaper and City of Lima web site in advance of the comment period. Information will also be available on the City of Lima's website and disseminated to subrecipients of HUD funding and key local service providers to reach a broader audience. Hard copies will also be made available at the Lima Public Library and DHN front desk for public review. News releases and Public Service Announcements will be sent to local media announcing the substantial amendment and location of draft copies containing the changes. Social media may be also used to disseminate information related to the comment period. A summary of all citizen comments will be included within any substantial amendment forwarded to HUD. All comments will be considered.

**Assessment of Fair Housing (AFH):** Any interested party or individual has fifteen (15) days to comment on the AFH before its submission to HUD. Notices for the comment period will be published in the local general circulation newspaper and City of Lima web site in advance of the comment period. Information will also be available on the City of Lima's website and disseminated to subrecipients of HUD funding and key local service providers to reach a broader audience. Hard copies will also be made available at the Lima Public Library and DHN front desk for public review. News releases and Public Service Announcements will be sent to local media announcing the comment period and location of draft copies. Social media may be also used to disseminate information related to the comment period. A summary of all comments received will be included within the final CAPER submitted to HUD. All comments will be considered.

## **VIII. PUBLIC HEARINGS**

**Consolidated Plan/Annual Action Plan:** A minimum of three public hearings are held to obtain citizen views on the Consolidated Plan and the Annual Action Plan. For the Consolidated Plan, at least one of the hearings must be held before the proposed Consolidated Plan is published for comments. These public hearings also provide a forum for public comment on program performance, as well as an opportunity for citizens to make proposals and pose questions. Hearings are held toward the end of the workday for the convenience of working people, at a location convenient to beneficiaries and accessible to all persons. Additional reasonable accommodations will be provided upon request.

Notices for the public hearings will be published at least fifteen (15) days in advance of the hearings for the Consolidated Plan and Action Plan in the local newspaper. The Public Notice will include: (1) information related to requesting reasonable accommodations for persons with disabilities; (2) a summary of the proposed plans describing the contents and purpose of the plans; and, a list of the locations where copies of the entire proposed Consolidated Plan and Action Plans may be available; and (3) a method for citizen's response or questions, either through the internet or mail.

All comments received at the public hearings will be accepted and noted as part of the final document.

For the Consolidated Plan, the City of Lima may also provide focus groups, forums or other public meetings for citizens at various times and locations to allow for greater participation from beneficiaries and potential beneficiaries. These forums, focus groups or public meetings will address neighborhood and resident concerns and assist in the development of priorities for the City of Lima's Five-Year Consolidated Plan. Notices of these open meetings will be published at least fifteen (15) days in advance in the local general circulation newspaper. Information will also be available on the City of Lima's website. Written notice will also be sent to all subrecipients. All notices will announce the dates, times and locations of these open meetings.

**Substantial Amendments:** A minimum of one public hearing may be held to obtain citizen comment on any substantial amendments to the Consolidated Plan/One-Year Action Plan. (*See page 13 for definition of substantial amendment.*) The public hearing provides a forum for the public to express their opinions of the proposed changes before final submission to HUD. The hearing will be held toward the end of the workday for the convenience of working people, at a location convenient to beneficiaries and accessible to all persons. Additional reasonable accommodations will be provided upon request.

Notices for the public hearing will be published at least fifteen days (15) in advance of the hearing in the local general circulation newspaper. Written notice will be forwarded to the local public housing authority and all subrecipients announcing the date, time and location of the public hearing. Information will also be available on the City of Lima's website. All comments received at the public hearing will be considered and noted within the final substantial amendment submitted to HUD.

**Assessment of Fair Housing (AFH):** A minimum of one public hearing may be held to obtain citizen views on the AFH. This public hearing provides a forum for public comment on the fair housing issues in the City. The hearing is held toward the end of the workday for the convenience of working people, in a location accessible to all persons. Additional reasonable accommodations may be provided upon request.

Notices for the public hearing will be published at least fifteen days (15) in advance of the hearing in the local general circulation newspaper. Information will also be available

on the City of Lima’s website. All comments received at the public hearing will be considered and noted within the final substantial amendment submitted to HUD.

## **IX. AVAILABILITY OF INFORMATION**

Draft and final copies of the Consolidated Plan, Annual Action Plan, CAPER and any substantial amendments will be available to all citizens in digital form and in paper. Costs for paper copies will be charged at current rates.

Paper copies are available for review at the Municipal Building, and various locations, including the Lima Public Library (available at the main branch and to other branches by request);

Hours of viewing at the Municipal Building will be from 8 a.m. to 5 p.m., Monday through Friday at the DHN front desk.

Depending on the hours of operations, all plans are accessible throughout the work week and may be available at some locations on weekends. Digital copies are always available through the City’s website.

The above documents are considered public information with the exception of records that contain confidential information about individuals participating in or benefiting from the CDBG/HOME programs.

## **X. ACCESS TO RECORDS**

In accordance with Ohio state law, housing and community development records belonging to the City of Lima are considered public information. Exceptions are records that contain confidential information about individuals participating in or benefiting from the CDBG and HOME programs. The DHN will provide citizens, public agencies and other interested parties with reasonable and timely access to public records relating to their past use of CDBG, HOME and related assistance for the previous five years. This information shall be made available to interested parties as requested and be noticed as such.

## **XI. PERSONS WITH DISABILITIES**

Public hearings and community meetings will be held at locations accessible to persons with restricted mobility. A sign-language interpreter will be available at public hearings and community meetings if requested at least 72 hours in advance.

According to the Federal Communications Commission, a person with a hearing or speech disability can use the 711 dialing code for access to Telecommunications Relay Services (TRS). (From City telephones, “9” needs to be dialed first --“9711.”) TRS permits a person with a hearing or speech disability to use the telephone system via a text

telephone (TTY) or other device to call persons with or without such disabilities. A list of the Ohio Relay Toll-Free Numbers is available at the DCD front office.

DCD staff is available to assist persons with hearing or speech disabilities by using written communication. Staff is also available to assist persons with a visual impairment by reading to them or providing large-print documents.

## **XII. NON-ENGLISH SPEAKING PERSONS**

Interpreters will be made available for non-English speaking citizens at public hearings and community meetings, if requested at least 72 hours in advance. Inquiries for translated summary copies of the Consolidated Plan, Annual Action Plan, CAPER, and substantial amendments will be considered by contacting DCD at least three weeks in advance.

## **XIII. COMPLAINT PROCEDURES**

Oral or written complaints concerning the planning, implementation, or reporting of the Consolidated Plan, Annual Action Plan, CAPER, and substantial amendments should be submitted to the director of the DHN, 50 Town Square, Lima OH 45801, (419) 221-5146. A written response to written resident complaints or concerns will be provided, as practical, within fifteen (15) working days. Any citizen may contact the Mayor or City Council to discuss problems not resolved at staff level.

## **XIV. DISPLACEMENT PROCEDURES**

The City of Lima will comply with all federal regulations governing residential anti-displacement and relocation assistance as they pertain to all HUD-funded programs.

Specifically, the City of Lima will comply with Section 104(d) of the Housing and Community Development Act of 1974 [42 U.S.C. 5304(d)], the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601), and 24 CFR Part 42 for its CDBG Program and HOME Program. In complying with the above:

- The City of Lima will take steps to minimize the displacement of persons from their homes.
- The City of Lima will provide relocation assistance to all lower-income households displaced by activities assisted with applicable HUD funds.
- To the extent required under the provisions of 24 CFR Sec.42.375, the City will replace on a one-for-one basis all occupiable and vacant lower-income dwelling units demolished or converted to a use other than lower-income housing units as a direct result of activities assisted with funds under applicable HUD programs.
- Pursuant to 24 CFR 42.375(c) and before entering into a contract committing the City of Lima to provide funds for a project that will directly result in demolition or conversion of lower-income dwelling units to another use, the City will make public by publication in a newspaper of general circulation and submit to HUD

the following information: a description of the proposed assisted activity; location on a map and number of dwelling units by size to be demolished or converted to a use other than for lower-income dwelling units; a time schedule for the project; the location on a map and the number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units; the source of funding and a time schedule for the provision of replacement dwelling units; the basis for concluding that each replacement dwelling unit will remain a lower-income dwelling unit for at least ten (10) years from the date of initial occupancy; and information demonstrating that any proposed replacement of dwelling units with smaller dwelling units is appropriate and consistent with the housing needs and priorities identified in the approved Consolidated Plan.

To the extent that the specific location of the replacement housing and other data in select items above are not available at the time of the general submission to HUD, the submission shall identify the general location of such housing on a map and the approximate number of dwelling units by size. Information identifying the specific location and number of units by size will be submitted to HUD and disclosed to the public as soon as it becomes available.

## **Commonly Used Terms and Definitions**

**Action Plan** - The annual document required by HUD that describes how the City will use its anticipated CDBG and HOME resources to implement the Consolidated Plan in a one-year time frame. The Action Plan also describes other actions that the City, its subrecipients (third-party partners), and other community partners will take to implement its Consolidated Plan.

**Affirmative Fair Housing (AFH):** - Community participation is required in 24 CFR Section 5.158 for solicitation of views and recommendations from members of the community and other interested parties, a consideration of the views and recommendations received, and a process for incorporating such views and recommendations into decisions and outcomes.

**Citizen Participation Plan (CPP)** - The HUD required plan that sets forth the City's policies and procedures for community and public input in HUD programs. The adopted plan must be used when developing the Consolidated Plan, the Action Plan and any substantial amendments to either plan.

**Community Development Block Grant (CDBG)** - A federally funded program administered by HUD with three primary objectives: to benefit low/moderate income persons through the creation of suitable living environments, decent housing, and economic opportunities; address and/or eliminate slum and blight; and address an urgent need.

**Consolidated Annual Performance and Evaluation Report (CAPER)** – This document reports one-year accomplishments and progress of the CDBG and HOME programs. The CAPER also includes financial reports regarding the use of grant dollars allocated to the above mentioned programs.

**Consolidated Plan (ConPlan)** - A Five-Year comprehensive plan that describes the City's housing and community development needs and goals along with projected local strategies to address them.

**HOME Investment Partnership Program (HOME)** - A federally funded program administered by HUD for the purpose of homeowner rehabilitation, homebuyer activities, rental housing, and tenant-based rental assistance activities.

**Department of Housing and Urban Development (HUD)** - The federal agency that oversees the use of federally funded programs including CDBG, HOME, and ESG, approves the City's Consolidated Plan, Annual Action Plan, Consolidated Annual Performance and Evaluation Report (CAPER), and any amendments to the aforementioned items. HUD is the regulatory agency charged with monitoring the City for compliance with all applicable contractual requirements.

**Substantial Amendment** - The Consolidated Plan and Annual Action Plan are living documents and, therefore, the City of Lima recognizes that it may periodically be

necessary to make significant changes to the documents. An amendment to the Consolidated Plan or Annual Action Plan is one that includes a change of thirty percent (30%) or more in the amount of funds allocated to a project; or a change within the programmatic service/scope of the plan, location or beneficiary. The City of Lima substantial amendment policy will follow 24 CFR 91.505 – “*Amendments to the Consolidated Plan,*” unless otherwise directed by HUD.

DRAFT