



CITY OF BEND
HOUSING

**Community Engagement and Public
Participation Framework
Policy and Procedure No. HOU-10**

PURPOSE: This policy establishes the City of Bend’s Community Engagement and Public Participation Framework and serves as the City’s citizen participation plan (CPP) required under 24 CFR Parts 91.105. The CPP sets forth the policies and procedures for community member participation for the use of Community Development Block Grant (CDBG) or other funds received from the U.S. Department of Housing and Urban Development (HUD). The CPP provides an opportunity for the community to work in partnership with the City to identify needs and to allocate funds.

APPLICABILITY: This policy applies to participation by the public in development of City of Bend’s Consolidated Plan and Annual Action Plan by the Housing Division for Community Development Block Grant funds.

REFERENCED FORMS:

n/a

DEFINITIONS: For purposes of the CDBG program, the following definitions will apply:

- 1. Affordable Housing Advisory Committee (AHAC)** – In alignment with the [Bend Municipal Code Ch. 1.20](#), the AHAC is a group of Bend community members appointed by the City Council, and based upon the needs of the community, makes recommendations to the Council regarding the expenditure of HUD funds and on programs for the promotion of affordable housing. Meetings of the AHAC are open to the public and community members are invited to attend and participate.
- 2. Community Development Block Grant (CDBG):** A grant program administered by the U.S. Department of Housing and Urban Development (HUD). This grant allots



money to cities and counties for housing rehabilitation, affordable housing assistance, community services, and community development activities (including community facilities and economic development).

3. **Low- and Moderate-Income Households** - Pursuant to HUD regulations, the primary beneficiaries of the CDBG program should be low- and moderate-income households, defined by HUD as follows:
 - a. **Extremely Low-Income** - 0-30% Area Median Income (AMI) adjusted for household size.
 - b. **Low-Income** - 31-50% AMI adjusted for household size.
 - c. **Moderate-Income** - 51-80% AMI adjusted for household size.
4. **Low- and Moderate-Income Neighborhood** - Generally defined as a census tract(s) or block group(s) in which a minimum of 51 percent of the residents have an income not exceeding 80% of the area's Median Family Income.
5. **Median Family Income (MFI)**: HUD surveys major metropolitan areas annually to develop an index of median family income by household size.
6. **Publicly Assisted Housing**: Housing developments (either rental or ownership housing) developed with the assistance of public funds such as CDBG, local assistance or tax rebates or exemptions, and tax credit financing.
7. **Slum or Blighted Area** - An area that meets the definition of a slum, blighted, deteriorated, or deteriorating area under State or local law, typically identified as Redevelopment Project Areas, or where a substantial number of deteriorating or dilapidated buildings or improvements are present throughout the area.
8. **Consolidated Plan (CP)**: A three- to five-year planning document required for the CDBG program. It must contain a housing and community development needs assessment, a three- to five-year strategic plan to address the needs identified, a one-year action plan to identify specify activities and planned use of CDBG funds.
9. **Annual Action Plan (AAP)**: A yearly document submitted to the HUD detailing how CDBG funds will be used to meet housing and community development needs, outlining specific projects, funding allocations, and strategies for improving decent housing, suitable living environments, and economic opportunities for low-and-moderate-income community members, as part of a 5-year Consolidated Plan.



10. Consolidated Annual Performance Evaluation Report (CAPER): An annual report required by HUD that summarizes the City's progress in using CDBG funds to reach the goals in the Annual Action Plan and Consolidated Plan. It documents program accomplishments, expenditures, and compliance with strategies designed to benefit low- and moderate-income community members.

SECTION 1: CITY OF BEND STANDARDS FOR COMMUNITY INVOLVEMENT

1. The City of Bend holds the following standards regarding community member involvement in development of the Consolidated Plan, Annual Action Plans, and other elements of the City's CDBG program:
 - a. All community member participation is to be done publicly.
 - b. Involvement of low- and moderate-income persons, underrepresented racial and ethnic groups, project area occupants, elderly, persons with disabilities and others is encouraged.
 - c. Reasonable efforts will be made to ensure continuity of involvement of community members throughout all stages of the CDBG programs.
 - d. Timely, clear, and accessible information will be shared with community members.
 - e. Community members and stakeholders are encouraged to submit their views and proposals regarding the Consolidated Plan and use of CDBG funds.
 - f. The Bend City Council makes the final determination of community priorities in development of the CDBG program plans that guide its annual allocation of CDBG funds.
2. While this CPP provides for and encourages the participation of all community members, special assurances will be made to encourage the participation of the following groups:
 - a. Extremely low-, low-, and moderate-income persons, as those terms are defined by HUD;
 - b. Persons living in areas where CDBG funds are proposed to be used;
 - c. Occupants of Publicly Assisted Housing;
 - d. Low-income community members of target neighborhoods;



- e. Underrepresented racial and ethnic groups;
- f. Non-English speaking persons; and
- g. Persons with disabilities.

SECTION 2: COMMUNITY ENGAGEMENT AND PUBLIC PARTICIPATION FRAMEWORK (CPP)

1. Community involvement in the CPP: The City of Bend recognizes that CDBG funds are to be used primarily to benefit extremely low-, low-, and moderate-income persons. City staff and officials are stewards of these public monies and will openly discuss all records, except those confidential records protecting a household's privacy. The City CPP is in alignment with 24 CFR Parts 91, et al.
 - a. The CPP seeks to involve the participation of Bend's community members and stakeholders in the development and adoption of the Consolidated Plan, the Action Plan, any substantial amendments, and the Consolidated Annual Performance Evaluation Report (CAPER).
 - i. In addition, efforts will be made to encourage the involvement of low- and moderate-income persons, those persons living in slum and blighted areas, persons living in low- and moderate-income areas and persons living in areas where CDBG funds are proposed to be used.
 - ii. The CPP consists of several elements designed to foster community involvement as specified in each section of the plan.
 - b. Pursuant to HUD regulations, the City will conduct a minimum of two public hearings annually at different stages in the CDBG program year which runs July 1 through June 30.
 - i. The City will conduct public hearings at locations and at times that are intended to be convenient to the public, especially for those persons affected by program resources, and the locations will be equipped to accommodate persons with physical disabilities.
 - ii. All public hearings may be virtual, if allowed by HUD, to meet recommended emergency response guidelines.



- iii. For non-English speakers, Spanish translation will be available at all public hearings if requested at least three (3) days prior to the hearing date.
 - iv. Other requests for reasonable accommodation (such as sign language) must be made at least three (3) days prior to the hearing date, and the City will provide appropriate assistance to the extent feasible.
- c. The approximate schedule for review and adoption of the Annual Action Plan and Consolidated Annual Performance and Evaluation Report is as follows, but may be changed at the discretion of the City in consultation with AHAC, based on specific needs of any program year:
- i. January – Public meeting to review Community Development Block Grant program and project proposals before the Affordable Housing Advisory Committee.
 - ii. February through March – Public Comment Period on the Annual Action Plan.
 - iii. March - Public Hearing at the Affordable Housing Advisory Committee, and Adoption of the Consolidated and/or Annual Action Plan by the Bend City Council.
 - iv. May – Submittal of the Consolidated and/or Annual Action Plan to Department of Housing and Urban Development in Portland.
 - v. September – Affordable Housing Advisory Committee Public Hearing to review the Consolidated Annual Performance and Evaluation Report after a 15-day public comment and review period.

2: Amendment of the CPP: The City will amend its approved CPP whenever a change in this plan is proposed.

- a. A draft of the CPP with the proposed amendments will be translated into Spanish and available for public review at City Hall and on the City of Bend's website:
<https://www.bendoregon.gov/government/departments/housing/funding-opportunities>.
- b. The Affordable Housing Advisory Committee will review any proposed amendment. Notice of any amendment to the CPP will be published in a local newspaper of general circulation and posted on the City website no less than



7 days prior to the review and adoption by the Affordable Housing Advisory Committee. This will allow the public the opportunity to review and comment on the amendment.

- c. Appeals concerning the amendment should follow the Appeal procedures outlined in Section 6.7 of this document.

SECTION 3: CONSOLIDATED PLAN (CP)

1. The CP identifies the housing and community development needs in the City, prioritizes the needs for funding, and prescribes a comprehensive strategy for addressing the needs. To maintain relevance, an Annual Action Plan including the following elements is developed for each program year:

- a. Dollar amounts proposed for each activity
- b. A description and location of each activity
- c. The entity responsible for implementation of each activity
- d. Time frame for each activity

2. The CP is due 45 days before the beginning of a program year. The City of Bend CDBG program begins annually on July 1, making the CP due no later than May 17 of each year.

3. Development of the Consolidated Plan: The City of Bend will implement the following strategies to solicit meaningful community input in preparation of the Consolidated Plan and Action Plan. Specifically, the City will:

- a. Review previous performance with the Affordable Housing Advisory Committee and discuss priority needs for upcoming year(s).
- b. Consult public agencies including City staff, adjacent local governments, economic development interests, and state and local health agencies.
- c. Consult private agencies that provide health services, social services for specific populations, which may include children, elderly, disabled, homeless, persons with AIDS, victims of domestic violence, and persons with substance use disorders, etc.
- d. Conduct at least one web-based survey and one public meeting during the community development needs assessment of the Consolidated Plan.



- e. Community member participation during the development of the Consolidated Plan will take place at the Affordable Housing Advisory Committee meetings, which are open to the public.
4. Adoption of the Consolidated Plan: The following procedures provide opportunity for all community members to participate in the development of the final version of the Consolidated Plan. Specifically, the City will:
- a. Publish a notice announcing the public hearing and public review and comment period of not less than 30 days, unless required period is waived or reduced by HUD, to receive comments from community members on the Draft Consolidated Plan and Action Plan. The notice will be published in a local newspaper of general circulation and on the City's website. Notice will include a summary of the Draft Consolidated Plan and Action Plan that describes the contents and purpose and a list of the locations where copies of the Draft Plan may be examined. The notice will be published at least fourteen (14) days prior to the public hearing.
 - b. The draft Consolidated Plan and draft Annual Action Plan will be available for public review the City of Bend website:
<https://www.bendoregon.gov/government/departments/housing/funding-opportunities>, and at City Hall.
 - a. The City will provide a reasonable number of free copies of the Draft Consolidated Plan and Action Plan to community members and groups that request copies.
 - b. The Executive Summary portion of the draft Consolidated Plan and draft Annual Action Plan will be translated into Spanish and available for review at City Hall and the City's website. Upon request, the entirety of the documents will be made available in Spanish.
 - c. Upon request, the draft Consolidated Plan and draft Annual Action Plan will be made accessible to any person with disabilities.
 - c. The Affordable Housing Advisory Committee will conduct a public hearing on the draft Consolidated Plan and draft Annual Action Plan.
 - d. At the end of the 30-day review period, the City Council will consider adopting the draft Consolidated Plan and draft Annual Action Plan. The draft Consolidated Plan and draft Annual Action Plan may be adopted by a majority vote of the Bend City Council.



- a. After adoption, the Consolidated Plan and Annual Action Plan will be submitted to HUD. These plans will include a summary of public comments and a summary of any comments not accepted and the reasons therefore, all of which will be attached to these plans.

4: Determinations to make an amendment: The City may amend the adopted Consolidated Plan and Annual Action Plan. Amendments may be substantial or minor, as described below. The following outlines the criteria and procedures to be used when adopting substantial amendments to the Consolidated Plan and Annual Action Plan.

- a. In accordance with federal regulation [24 CFR 91.505](#) and [24 CFR 91.505](#), the City will amend its approved Consolidated Plan and Annual Action Plan whenever it proposes to change allocation priorities or the method of distribution of funds, carry out a project using funds from any program covered by the Consolidated Plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD) that is not previously described in the approved Consolidated Plan or Annual Action Plan, or change the purpose, scope, location, or beneficiaries of a project.
- i. Substantial Amendments: the following changes constitute a Substantial Amendment:
 1. To carry out an activity not previously described in the Action Plan;
 2. To cancel an activity previously described in the Action Plan;
 3. To increase the amount to be expended on a particular activity from the amount stated in the Action Plan by more than 50%; or
 4. To substantially change the purpose, scope, location, or beneficiaries of an activity.
- ii. Minor Amendments: changes in the amount of funds allocated to an approved activity to achieve the original purpose of the activity of up to 50% of the originally allocated amount, and other changes that do not constitute Substantial Amendments. Minor amendments may be carried out at the discretion of the City and are not subject to the Substantial Amendment process. Minor amendments may be processed administratively by City staff and approved by the City Manager without a public involvement process.



5: Amendment process: The following procedures will provide all community members with a chance to comment on the proposed Substantial Amendment to the Consolidated Plan or Action Plan.

- a. Proposed Substantial Amendments will be reviewed by the Affordable Housing Advisory Committee at a regular or special meeting for its recommendation to the Bend City Council.
- b. The City will publish a notice of the public review and comment period of not less than 30 days, unless required period is waived or reduced by HUD, to receive comments from community members on the proposed substantial amendment to the adopted Consolidated Plan or Annual Action Plan. The notice will be published in a local newspaper of general circulation and on the City's website and will include a summary of the substantial amendment and where copies of the drafted document may be examined.
- c. The proposed Substantial Amendment will be available for public review at City Hall and on the City of Bend's website at <https://www.bendoregon.gov/government/departments/housing/funding-opportunities>. Upon request, the amendment will be made accessible to any person with disabilities and/or offered language assistance for a community member of limited English proficiency.
- d. At the end of the public review and comment period, the Bend City Council will consider adoption of the substantial amendment upon a majority vote of the Bend City Council.
- e. The approved substantial amendment will be sent to the City's primary contact at the Portland HUD Field Office.

SECTION 4: CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT (CAPER)

The following procedures will provide all community members with a chance to comment on the CAPER.

1. The draft CAPER will be reviewed at a public hearing by the Affordable Housing Advisory Committee at one of the committee's regular meetings.
2. Publish a notice of the 15-day public comment period on the draft CAPER. The notice will be published in a local newspaper of general circulation and the City's website. The notice shall provide information on the public hearing and where the draft CAPER can be reviewed.



3. The draft CAPER will be available for public review at City Hall and on the City of Bend's website at <https://www.bendoregon.gov/government/departments/housing/funding-opportunities>. Upon request, the CAPER will be made accessible to any person with disabilities and/or offered language assistance for a community member of limited English proficiency.
4. The CAPER is due to HUD 90 days after the close of a program year. For the City of Bend, each program year ends on June 30, making the CAPER due to HUD no later than September 28 of each year.

SECTION 5: PUBLIC PARTICIPATION

The City of Bend believes it is essential to have widespread, meaningful participation throughout the planning process to ensure genuine community "ownership" of the program. Inherent in these principles is extensive, relevant, and ongoing community member participation.

1. Public Notification of Public Hearings: Staff will provide adequate advance notice of all public hearings. Adequate noticing will include:
 - a. Printing notices in a local newspaper of general circulation, at least fourteen (14) days prior to the public hearings.
 - b. Posting notices at <https://www.bendoregon.gov/government/departments/housing> in both English and Spanish.
 - c. Affordable Housing Advisory Committee's website at www.bendoregon.gov/government/committees/affordable-housing-advisory-committee.
2. Access to Records: The City will provide community members, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan documents and the use of assistance during the preceding five years.
 - a. At all times during the City Hall operating hours, all information regarding the HUD programs will be made available upon request, including the Federal Regulations governing the CDBG programs, a year-by-year breakdown of the program expenditures, the minutes of the most recent Affordable Housing Advisory Committee, the most recent report of the program activities, records of Affordable Housing Advisory Committee meetings, mailings and promotional material, prior years application, letters of approval from HUD, grant agreements,



this CPP, reports required by HUD, the current proposed application, and any other documents regarding important program requirements by HUD.

- b. During the period of planning for the next program year, information to be made available to the public will include such items as the amount of funds available to projects within Bend, the range of activities that may be undertaken with these funds, the kind of activities previously funded in Bend, the processes involved in drawing up and approving Bend's application, the role of Bend's community members in the CDBG programs and any other information necessary for Bend's community members to participate in the process fully. Requests for information and records must be made to the City of Bend in writing. Staff will respond to such requests within fifteen working days or as soon as possible thereafter.

3. Technical Assistance: Upon request, staff will provide technical assistance to groups representing extremely-low, low- and moderate-income persons to develop funding requests for CDBG eligible activities. Technical assistance will be provided as follows:

- a. Answer, in writing or verbally, all inquiries received from community members or representative groups relating to funding requests.
- b. Meet with groups or individuals as appropriate, to assist in identifying specific needs and to assist in preparing request/application for assistance.
- c. Provide bi-lingual translation on as needed basis.

4. Comments: Community members or the City government, as well as agencies providing services to the community, are encouraged to provide comments in the development of the Consolidated Plan documents and any amendments to these documents. Written and verbal comments received at public hearings or during the comment period will be considered and summarized and included as an attachment to the final Consolidated Plan documents. Written comments should be addressed to:

housing@bendoregon.gov

or

City of Bend
Housing Division
P.O. Box 431
Bend, OR 97709

- a. A written acknowledgement to all written comments will be made within ten working days, acknowledging receipt and responding to requests for information



or clarification, as needed. Every effort will be made to respond within fifteen working days to those who submit written comments.

5. Complaints: Community members with complaints concerning the Consolidated Plan, the Annual Action Plan, substantial amendments, or the CAPER should contact the City of Bend personnel by phone or in writing within 30 days from the date the document is published for comment.

- a. Complaints concerning any CDBG-funded program in which the person believes access has been limited or denied must be made within 30 days from the date of the occurrence. Staff will review each complaint based on the information provided within the complaint and provide complete written responses to community member complaints within fifteen working days from the date of their complaint when practicable. Complaints should be directed to:

housing@bendoregon.gov

or

City of Bend
Housing Division
P.O. Box 431
Bend, OR 97709

or

Tel. No. (541) 323-8550

- b. A record will be maintained of all complaints received that will include the nature of the complaint, City investigation of facts and evidence, referrals made, and the final disposition.
- c. Written complaints must specify the following:
 - i. The description of the objection, and supporting facts and data, and
 - ii. Provide name, address, telephone number of the person making the complaint, and a date of complaint.
- d. Community members may contact HUD directly if they wish to object to any part of the Consolidated Plan, Annual Action Plan or Consolidated Annual Performance or Evaluation Report, or if they feel that they have been



aggrieved by any program, activity or procedure funded through CDBG funds. Such objections should be made to:

Program Manager
U.S. Department of Housing and Urban Development
1220 SW 3rd Ave., Suite 400
Portland, OR 97204-2852

6. Language Translation: Translation services will be provided upon advance request to the extent feasible. Translation services at public hearings and meetings will be provided in Spanish if translation services are requested at least 3 days prior to the meeting date.

7. Appeals: Appeals concerning the Consolidated Plan documents or decisions, statements, recommendations of the staff, or disposition of complaints should be made first to the Affordable Housing Coordinator, then to the Affordable Housing Manager, then to the City Manager, the City Council, and finally to the Portland Area Office of HUD if concerns are not answered.

8. Anti-displacement/Relocation: In all cases, the work described in this policy seeks to minimize the displacement of occupants from their homes or places of business.

- a. If any residential displacement and relocation must take place to carry out a program activity, the City of Bend ensures that it will develop an anti-displacement and Relocation Plan in connection with that project as per applicable Federal regulations.
- b. If any acquisition and relocation must take place to carry out a program activity, Bend will also comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1070, as amended and implementing regulations of 49 CFR Part 24.

9. Assurances: The City of Bend assures that the most diligent effort will be made to comply with the process and procedures outlined in this CPP.

10. Exceptions to Public Consultation and Notice Requirements: The City of Bend, when provided the authority from Housing and Urban Development Department, may utilize any flexibility or statutory waivers provided by HUD as they relate to the Community Development Block Grant Program.

- a. Waivers are typically provided in the event of disaster and/or emergency declaration, though waivers may be available at other HUD specified times.
- b. A declared disaster or emergency may include but is not limited to the following:



- i. Man-Made Disasters
 - ii. Natural Disasters
 - iii. Terrorism
 - iv. Infections Disease or Pandemic (such as COVID-19/coronavirus)
 - v. National Emergency
- c. If waivers are available from HUD to assist in expediting available additional resources and/or any plan modifications, City of Bend staff may take full advantage of offered exceptions to standard CPP requirements outlined in other sections of this plan.
- d. Reasonable notice and opportunity for public response will be considered minimums outlined in any provided waivers.



Document Control

Revision Date	Portions Revised	Reason for Revision
8/29/2024	n/a – policy origination	Existing policy (revised in 2022) was reformatted to current policy format.
3/31/2026	Entire document	Edits approved by the Affordable Housing Advisory Committee on 3/31/2026. Completely revised document.