



**Citizen Participation Plan
&
Four-Factor Analysis and Language Access Plan (LAP)
for Limited English Proficiency Persons**

Broward County, Florida

Housing and Urban Planning Division (HUPD)

Amended October 2025

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Introduction

Each year, the Broward County receives funding/allocations¹ through the US Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Shelter Grants (ESG) grant programs.

²HUD occasionally allocates disaster recovery and emergency funding under the CDBG and HOME programs. Sometimes these funds come as separate allocations to aid recovery and/or mitigate risks against future disaster events. CDBG, HOME, and ESG, and related disaster recovery and emergency programs are administered by the Housing and Urban Planning Division (HUPD) of Broward County, Florida.

As a requirement for receiving these funds, the County must develop and adopt a citizen participation Plan that establishes policies and procedures to encourage citizen participation. This process includes scheduling, publicizing and conducting public meetings and hearings.

Citizen Participation is an integral part of the planning process for the Consolidated Submission for all Community Planning and Development Programs (CPD). Much of the citizen participation process involves scheduling, publicizing and conducting public meetings and hearings. HUD, in its attempt to ensure adequate opportunity for participation by program beneficiaries, has prescribed minimum Citizen Participation, plan submission, performance reporting, and record maintenance requirements. These Citizen Participation Requirements are established in 24 Code of Federal Regulations (CFR) Part 91.105. (except as provided for in notices providing waivers and alternative requirements).

It also requires that the County complete several planning and reporting reports to be submitted to HUD for approval. These reports include:

- 1) Five Year Consolidated Plan (ConPlan/CP);
- 2) Analysis of Impediments to Fair Housing Choice (AI);
- 3) Annual Action Plan (AAP), to include disaster recovery and/or any other Disaster, or Economic Recovery Interim/short term Congressional Appropriation action plan;
- 4) Consolidated Annual Performance Evaluation Report (CAPER);
- 5) Citizen Participation Plan; and
- 6) A Substantial Amendment to any of the above plans or reports (as defined below)

The CDBG, HOME, and ESG programs are administered by the Housing and Urban Planning Division (HUPD) of Broward County, Florida.

The local citizen participation process generally includes a yearly series of well-advertised community/neighborhood public meetings held at the Housing and Urban Planning Division office, to review the Annual Action Plan(s) and the Consolidated Annual Performance Evaluation Report as well as any amendments or changes to the Consolidated Plan. All meetings and public hearings are advertised in accordance with applicable HUD, State and local regulations. Public notices for environmental procedures and project related purposes are also part of the citizen participation process.

¹ Additional Disaster and Emergency Funding/Allocations - HUD sometimes appropriates additional funding to the CDBG or HOME funds in multiple rounds. These funds (if the CPD notices/federal registers allows it), can be used interchangeably and as part of the same allocation.

² These funds (if the CPD notices/federal registers allows it), can be used interchangeably and as part of the same allocation.

The citizen participation plan (or any required Action Plan for short-term or emergency grants) will be available at the HUPD's physical address, and on the Broward County website.

Public Notice

Prior to the adoption of the Annual Action Plan and/or the Consolidated Plan, the County will make information available to residents, public agencies and other interested parties regarding activities and program that will be undertaken as part of grant funding. This information includes the amount of grant fund allocated to the County, anticipated program income, range of activities, and estimated funding benefiting LMI persons. CDBG, HOME, and ESG activity and program information will be available at HUPD's offices and Website.

Any other Action Plan associated with the Disaster Recovery program funding and activity information, or any Emergency, Disaster, or Economic Recovery Interim/short term Congressional Appropriations will follow the same process in accordance with the universal notice, and applicable waivers.

The HUPD conducts public hearings and meetings at the HUPD location (110 NE 3rd Street, Fort Lauderdale, FL 33301). To encourage citizens to participate in the development of the Annual Action plan, Consolidated Plan, and the Citizen Participation Plan (CPP), public hearings and meetings are held, whenever possible, in the early evening, Monday through Friday, and virtually to provide opportunities for those with traditional work schedules to attend. Whenever feasible, the HUPD schedules meetings in various public venues throughout the County (public libraries, community centers, etc.).

HUPD staff particularly emphasizes participation by low- to moderate-income (LMI) people and residents of slum and blighted areas. HUPD continuously seeks methods to increase accessibility to public hearings, meetings, and opportunities for LMI community members to participate.

Whenever possible, the Broward County Housing and Urban Planning Division (HUPD) takes a two-fold approach to achieving the above goal. The first approach provides for, encourages, and assists Broward County's target area communities in maintaining civic associations which have over the years facilitated the citizen participation function in the Community Development Block Grant Program. The unincorporated/Municipal Services District (MSD) area civic group's function on an on-going basis and their activities are monitored by HUPD staff.

All residents of the unincorporated target area are encouraged to become members of the civic association in their particular neighborhood, and annually each organization is expected to elect officers in accordance with its bylaws. The civic associations conduct meetings where residents are encouraged to provide input in community development needs and programs.

The second approach involves collaborating with municipal staff, and residents of the participating municipalities in the development of the needs assessment and selection of projects to be funded.

Residents of public housing are encouraged to participate in the process through the municipality where they are located or the unincorporated area civic association adjacent to them.

All public hearings shall be announced at least seven (7) calendar days before the date of the meeting. Whenever possible, the HUPD will utilize the following media to notify citizens regarding upcoming meetings.

- A. Newspaper advertisements, of no smaller than eight (8) point size, are published in adjudicated County newspapers of general circulation serving the County in English. Each publication is published at least seven (7) calendar days before the date of the public hearing.
- B. Public Hearings are always advertised on the Broward County website.
- C. During declared emergency situations, such as pandemics or natural disasters, the requirement to publish the notice and summary in a newspaper of general circulation described above may be suspended. The County shall at a minimum publish public notices on the Broward County website and promote such advertisements and on social media as available. Furthermore, a shorter time period for notification may be allowable by HUD waivers. The timelines adopted will be those established by HUD at the time.

Community Development Block Grant Disaster recovery (CDBG-DR) Allocation and/or any Emergency, Disaster, or Economic Recovery Interim/short term Congressional Appropriations.

Broward County’s HUPD will follow apply letter/option C. above under the title Publication when any disaster or emergency funds are allocated.

HUD waivers may permit a shorter notification time period during declared emergencies and for appropriated disaster recovery, emergency, and economic recovery program funding. The timelines adopted will be those established by HUD at the time of the disaster or appropriation.

In addition, the HUPD, in an effort to expedite the use of disaster or emergency funds, will follow any HUD Streamlined Funding Requirements to Simplify Disaster Recovery with the Universal Notices and the below.

- If substantial amendment, the HUPD will publish the proposed amendment and follow Citizen Participation process as required in applicable Federal Register Notice(s)
- If non-substantial, HUPD will notify HUD as required, but is not required to undertake public comments and do not require HUD approval.
- Public Notices may not be required to be published in a major publication (ex, Sun Sentinel) but may be published on the HUPD’s website and a hard copy will be available to be reviewed at the HUPD office located at 110 NE 3rd Street, Suite 300 (3rd floor), Fort Lauderdale, Florida 33301.

CDBG-DR Contact – Yvette Lopez, Manager
Housing and Urban Planning Division

CDBG-DR Website – [Housing and Urban Planning Division Community Development Block Grant Disaster Recovery CDBG-DR](#)

II.B.6. Consolidated Plan. The requirements for consistency with the consolidated plan in Section 106 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12706), and regulations at 24 CFR 91.225(a)(5), and 24 CFR 91.325(a)(5)) are temporarily waived because the effects of a major disaster alter a grantee’s priorities for meeting housing, employment, and infrastructure needs. In conjunction, 42 U.S.C. 5304(e) is also waived, to the extent that it would require HUD to annually review grantee performance under the consistency criteria. These waivers apply only for 24 months after the applicability date of the grantee’s (Allocation Announcement Notice) AAN. If the grantee is not scheduled to submit a new three-to five-year consolidated plan within the next two years, the grantee must update its existing three-to five-year consolidated plan to reflect disaster-related needs no later than 24 months after the applicability date of the grantee’s AAN.

Public Hearings & Public Meetings

At least two public hearings must be held each year. One public hearing will be at the beginning of the Division's Universal Request for Applications (RFA)/Notice of Funding Availability (NOFA) process (pre-development stage) and the final hearing will be at the end when the Board of County Commissioners (or Designee – County Administrator) approves final recommendations for submittal to HUD (Pre-Adoption Stage). This Universal RFA/NOFA process is intended to comply with the County's overall procurement process for solicitation of applicants to apply for CDBG, HOME, and ESG program funds. Additionally, this plan highlights the steps in the Universal RFA/NOFA Process, the process to develop needs, review proposed activities and program performance as well as the manner in which hearings are advertised and conducted. Additional public meetings may be held at the discretion of County staff.

In order for proposals to be accepted from cities, a resolution from the governing body authorizing proposal submittal must be received, along with hearing notices, a roster and minutes of community neighborhood advisory board meetings. This is to ensure the provision of information to board(s) regarding proposals and reflects subsequent input and verification of other efforts to provide information to citizens. Furthermore, community development corporations and community based organizations are required to submit various certification requirements and maintain on file, the charter, bylaws and an IRS 501 (c) letter or date of application to be considered as an eligible applicant for CDBG, HOME or ESG funding.

- In emergency situations, when a resolution may not be possible, an emergency ordinance may allow for the County Administrator's signature, however, all required notices, review periods and comment periods must still be adhered to.³

All records relating to the development of the Consolidated Plan are on file at the Housing and Urban Planning Division and the public has unlimited access to these records for a period of five (5) years.

The public hearings will serve several purposes:

- 1) inform potential recipients of the functions of the HUPD and its relationship to both Broward County Board of County Commissioners and HUD;
- 2) explain the rules and regulations governing the CDBG, HOME, and ESG program;
- 3) explain how the program relates to the needs of individuals/neighborhoods/non-profit organizations, etc.;
- 4) provide information regarding the amount of CDBG/HOME/ESG funds expected to become available;
- 5) explain the types of eligible activities;
- 6) discuss the status of previously funded activities;
- 7) determine citizen's perceived housing and non-housing community development needs and possible activities to address those needs;
- 8) review of performance and compliance issues;

³ Section is subject to change. Required notices, review periods and comment periods will comply with HUD issued statutes, regulations and waivers.

- 9) detail the County's plan to minimize displacement;
- 10) and receive comments, input and feedback related to each plan and/or report.

During declared emergency situations, such as pandemics or natural disasters, public meetings and hearings may be held in an online capacity as allowed by HUD. In this situation, the ability for public comment will be provided.⁴

Publication of Plans & Reports

The Broward County Housing and Urban Planning Division (HUPD) will publish, and/or make available to the public, the following plans and reports:

- 1) Five Year Consolidated Plan
- 2) Analysis of Impediments to Fair Housing Choice (AI)
- 3) Annual Action Plan
- 4) Consolidated Annual Performance Evaluation Report (CAPER)
- 5) Citizen Participation Plan (CPP)
- 6) A Substantial Amendment to any of the above plans or reports (as defined below)
- 7) Four-Factor Analysis and Language Access Plan (LAP) for Limited English Proficiency Persons

The publication is made to afford citizens an opportunity to examine the documents' contents, and to provide further opportunity for comments (written and orally) and citizen feedback regarding the proposed document. A brief summary of each plan and/or report is to be published in newspapers of general circulation in English.

Additionally, all plans and reports listed above shall be made available, in their entirety, for further review in the following manner: 1) a PDF copy available on the County's website 2) hard copies available for review at the County offices. Furthermore, copies of the proposed plan and/or report will be made available for review, free of charge, for individuals who request them.

A period of no less than thirty (30) days shall be made available for public review and comment for the Consolidated Plan, Annual Action Plan, and the Citizen Participation Plan. The County shall make the Consolidated Annual Performance and Evaluation Report (CAPER) and any other required modifications available for public comment for a minimum of fifteen (15) calendar days prior to finalization by County staff. All performance reports will be available for review and comment for at least fifteen (15) days prior to HUD submissions.

Substantial Amendments to the Annual Action Plans and/or Consolidated Plans will be available for review and comment for at least thirty (30) days prior to HUD submissions.

The Analysis of Impediments to Fair Housing Choice does not require a public comment period.

Upon approval of the Consolidated Plan by the Housing and Urban Planning Division Director, the Division publishes the plan summary in a newspaper of general circulation. The Board of County Board of County Commissioners (BOCC) or The Housing and Urban Planning Division (HUPD) conducts a

⁴ Section is subject to change. Required notices, review periods and comment periods will comply with HUD issued statutes, regulations and waivers.

public hearing to receive final Public input on the Consolidated Plan. Upon completion of the Consolidated Plan, residents are advised of its availability for review and comments, allowing up to thirty (30) days for written comment. During this time, the Consolidated Plan is available for review at the HUPD Offices located at 110 NE 3rd Street, Suite 300, Fort Lauderdale, Florida 33301, or online at www.broward.org/housing.

Based on this input, the HUPD may recommend an amendment of the Consolidated Plan to the BOCC. Final approval of the Consolidated Plan comes from the Board of County Commissioners (or designee). When any of the plans are taken to the BOCC, all BOCC meetings are published at least seven (7) days in advance.

Section 1.11(ff) of the Broward County Administrative Code, delegates the County Administrator the Authority, during summer recess of the BOCC, to enter into agreements, and take such other administrative actions on behalf of the BOCC as are necessary to protect the County and the public interest.

During declared emergency situations, such as pandemics or natural disasters, the public comment period may be shortened, as described by HUD, to as little as five (5) days to accelerate the process. In these cases, public documents will be made available on the Broward County website only.⁵

Amendments to Plans & Reports

In the event the County needs to make changes to the Consolidated Plan and the Annual Action Plan, the County must determine the nature of the required changes and in such cases where the changes are considered substantial, the County must produce what HUD refers to as a Substantial Amendment to the Consolidated Plan and/or Annual Action Plan.

The Substantial Amendment process will occur when the following program changes exist:

To the Consolidated Plan:

- 1) there is a change to the Priority Needs identified in the Strategic Plan;
- 2) there is a change to the Goals and Objectives identified in the Strategic Plan;
- 3) there is a change to the Target Geographies/Areas identified in the Strategic Plan; and
- 4) new entitlement grants are awarded to the County.

To the Annual Action Plan:

- 1) there is a significant change to the Annual Goals and Objectives identified in the Action Plan;
- 2) there is a change to the Target Geographies/Areas identified in the Action Plan
- 3) creation of a new Project⁶ not previously described in the Action Plan;
- 4) the funding allocated to an existing Project is adjusted by whichever is lesser: 30%, or more, or

⁵ Section is subject to change. Required notices, review periods and comment periods will comply with HUD issued statutes, regulations and waivers.

⁶ Project as used in the AAP - Projects represent major types of programs funded in Action Plans such as Housing, Public Services, Capital/Public Infrastructure, etc. Activities are those within the projects such as Housing Rehabilitation, Purchase Assistance, and Drainage Projects, Solar Lighting, Afterschool Care, Senior Meals, etc.

\$350,000 of the initial funding amount; and

- 5) revision to an existing project which changes the purpose, scope, location, or beneficiaries of the program above 30%.

HOME Grant

The HOME Grant follows the same Substantial Change policy as above, with the exception that Each municipality is considered a “Project”, therefore, a “Substantial Amendment” is required when there is a change of more than 50% (increase/decrease) in funding, program deliverables and/or beneficiaries.

All other changes will be considered revisions (non-substantial) and will be accomplished administratively by the HUPD.

Prior to amending a Consolidated Plan and/or Annual Action Plan, the County will provide citizens with reasonable notice of, and opportunity to comment on, proposed program changes in its use of Action Plan funds for a project (either funded in whole or in part). This involves a 30-day review/comment period for the Consolidated Plan and Annual Action Plan. A summary of citizen comments or views and the reasons any such comments or views were not accepted will be attached to amendments of the Plan. The County will consider any such comments, and if the grantee deems appropriate, modify the changes.

Citizen Comments & Feedback

During all public meetings and hearings citizens are encouraged to comment or submit written comments/complaints to the Broward County Housing and Urban Planning Division concerning the proposed plans, reports and the performance of the HUPD and/or other County departments and entities under contract with the County for the implementation of program related activities. All comments, written and oral, will be accepted and included as part of the citizen participation records for the associated plan and/or report.

Citizens may also provide written and oral comments at public hearings and written feedback via mail addressed to the following:

Housing and Urban Planning Division
Attention: Director
110 NE 3rd Street, Suite 300
Fort Lauderdale, Florida 33301

The Housing and Urban Planning Division may also be reached by telephone for oral comments and email comments at Ylopez@broward.org or Phaggerty@broward.org or by calling (954) 357-4900.

When responses are warranted, written comments/complaints regarding any facet of the CDBG, HOME, or ESG program or its implementation in Broward County are answered in writing. Unless specific circumstances exist, which prevent immediate action, written replies are mailed within fifteen (15) working days, where practical, after receipt of the written comment/complaint (or oral comment/complaint if made during a public meeting/hearing).

Accessibility of Meetings & Documents

Bilingual Information

With at least two (2) business days of advanced notice Spanish translators will be provided at public meetings. Translation services will also be provided for persons who may need assistance reviewing printed documents, reports and/or other related materials. Citizens may contact the HUPD office at (954) 357-4900 at least 48 hours in advance to request such services.

American With Disabilities Act (ADA) - 1973 Rehabilitation Act

With at least two (2) business days of advanced notice, the department shall provide assistance and special arrangements for those who are disabled in order to provide information and services concerning federally funded programs. All county CDBG, HOME, and ESG program related plans will be placed in the Broward County Public Libraries. Each library has reader magnification machines to aid the visually handicapped to read HUPD records. Proposed plans are placed on the HUPD's website at <https://www.broward.org/Housing>.

All visual aids used in the commissioner's chambers are displayed on large screens to help all sighted people to see them better. All public meetings are held in buildings which are accessible to the handicapped. Citizens may contact the HUPD Office at (954) 357-4900 at least 48 hours in advance to request such services.

With The Americans With Disabilities Act (28 CFR 35.106)

In accordance with the requirements of Title II of the Americans with Disabilities Act (ADA) of 1990, Broward County does not discriminate on the basis of disability in the admission, access, or operations of its programs, services, activities or facilities. In accordance with Title II of the (ADA), when viewed in their entirety, Broward County government programs, services, activities and facilities are readily accessible to and usable by qualified individuals with disabilities.

Effective Communication: The County will generally, upon request, provide appropriate aids and services leading to effective communication for qualified individuals with disabilities so they can participate equally in the County's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to individuals with speech, hearing, or vision impairments.

[https://www.broward.org/Intergovernmental/Documents/AccommodationRequestForm\(AuxiliaryAid-Modification\).pdf](https://www.broward.org/Intergovernmental/Documents/AccommodationRequestForm(AuxiliaryAid-Modification).pdf)

To address the above requirements, all County websites are equipped with the latest automated website accessibility platform/application.

Additional Citizen Participation Activities

Consultation of Area Agencies

Under 24 CFR.91.100 (a)(1) as part of the Consolidated Plan process, the County shall consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. The County shall also consult with community-based and regionally based organizations that represent protected class members and organizations that enforce fair housing laws when preparing the Consolidated Plan including participants in Fair Housing

organizations, nonprofit organizations that receive funding under the Fair Housing Initiative Program and other public and private fair housing service agencies, to the extent that such entities operate within the jurisdiction. Additionally, the consultation process will include consultation with regional government agencies in addition to adjacent units of general local government and local government agencies. This includes local government agencies with metropolitan-wide planning and transportation responsibilities, partially for problems and solutions that go beyond the County's jurisdiction.

Under 24 CFR.91.100 (c)(1) as part of the Consolidated Plan development process, the County shall also consult with public housing authorities (PHAs) operating within the jurisdiction. This consultation will continue to consider public housing needs, planned programs and activities under the Consolidated Plan as well as strategies for affirmatively furthering fair housing specifically to address any fair housing issues in the public housing and Housing Choice Voucher programs. The consultation process requires the County to address the needs of public housing and, where necessary, the manner in which it will provide financial or other assistance to a troubled PHA to improve the PHA's operations and remove the designation of troubled.

Public Access to Records

The HUPD maintains copies of all plans, reports and amendments for each program year in the department office. Additionally, the HUPD maintains a library of rules, regulations, and records required by HUD and Broward County. This library of records includes records related not only to the plans and reports but also all programmatic documents, meeting notes, written and oral comments received, environmental reviews, office publications, etc., produced since the inception of the CDBG, HOME, and ESG program in Broward County. This information is available for public review and copying during normal business hours, provided that the requested document is public information pursuant to applicable federal, state, and local laws.

Public Access to Data Sources

As part of the Consolidated Plan and the Analysis of Impediments to Fair Housing Choice, the County will utilize HUD provided data sets and mapping tools. When applicable, the County will reference these data sets in plans and reports as well as provide a link to such data sources within the draft documents. This shall provide citizens and community stakeholders the opportunity to review the data utilized to set priority needs, goals and objectives.

Residents of Public and Assisted Housing

Residents of public and assisted housing are stake holders with HUD in that they receive rental assistance from HUD. These residents are therefore encouraged to participate in the planning and execution of the CDBG, HOME, and ESG programs, because they are also eligible to benefit from the expenditure of HUD federal funds.

Environmental Review

In certain instances, the participation consists of publication of specific actions/findings, including a description of the project, its locations, submission of relevant data to applicable local, state and federal agencies for review and comment, and the Director of the Housing and Urban Planning Division's approval of federal environmental findings relating to the Request for Release of funds from HUD.

Public Comment Periods:

- **NOI-RROF:** 7 days if published, 10 days if posted/mailed.
- **FONSI/Combined Notice:** 15 days if published, 18 days if posted/mailed.
- **HUD Approval Period:** Following the notice period, HUD allows an additional 15 days for public comment before approving the request.

Type of Notice	Level of Review	Length of Comment Period
NOI-RROF	CEST, EA, and EIS	7 days when published in a general circulation newspaper or on a government website* or, if no publication, 10 days when mailing and posting
Notice of FONSI	EA only	15 days when published in a general circulation newspaper or on a government website* or, if no publication, 18 days when mailing and posting
Concurrent or combined notices	EA only	15 days when published in a general circulation newspaper or on a government website* or, if no publication, 18 days when mailing and posting

Publication Procedures:

- **Accessibility:** Websites used for publication must be accessible to individuals with disabilities and provide meaningful access to limited English proficiency populations

Miscellaneous and Informal Meetings

HUPD staff attends and/or conducts miscellaneous meetings and hearings throughout the program year. While many of these meetings are project specific, many others are held at the request of individuals, groups, other County departments or County Commissioners for the purpose of disseminating or receiving information about the CDBG, HOME, and ESG program in general, or about issues of specific interest, and/or Emergency/Special Grants. These meetings generally are not advertised, since the meeting is attended by the parties requesting the meeting, HUPD staff and various other invited participants.

The HUPD maintains an Initial Contact/Proposed Project file and Citizen Comment/Complaint file. These mechanisms allow HUPD to record correspondence with individuals and/or organizations that submit proposals or make comments or requests of the department during the program year. Requests, proposals and questions received during the program year are researched and discussed during applicable local public meetings and during the planning of subsequent programs. This information is on file in the HUPD office and is processed at a time appropriate to the nature of the specific contact.

Technical Assistance

Pursuant to the Housing and Community Development Act of 1974 (as amended) and its implementing federal regulations, the County’s Housing and Urban Planning Division shall provide technical assistance when requested by public and private agencies, non-profit public benefit organizations and individuals for the purpose of assisting the agency or individual in developing its proposal for consideration of Consolidated Plan funding, provided the proposal is eligible and qualifies per HUD regulations. Technical assistance shall include but not be limited to:

- A. Assisting in better defining the proposal by outlining specific information the applicant(s) should gather and include in their proposal.
- B. Referring applicant to other public and private agencies which may help gather or provide needed information and/or technical assistance.
- C. Provide financial, feasibility, eligibility, etc. guidance during the technical assistance period/timeframe for the municipal application and Notice of Funding Availability (NOFA) proposal cycles.
- D. Preparing very basic conceptual descriptions in the municipal application and NOFA proposal cycles.
- E. Providing for final review of the municipal application for completeness prior to its official submission to the HUPD for consideration for funding.

In addition to the technical assistance for development of proposals, the HUPD will continue to provide assistance for implementation; and administration and monitoring of CDBG, HOME, and ESG funded projects. This assistance includes such things as:

- A. Obtaining environmental clearance for projects.
- B. In certain instances (depending on staff workload), implementing activities on behalf of the subrecipient.
- C. Providing guidance in the solicitation and contracting process for hiring a consultant to ensure compliance with applicable local, state and federal regulations.
- D. Assisting in reviewing and monitoring consultant's work.
- E. Providing guidance in bid advertisement for construction to ensure compliance with all applicable DBRA, Section 3 and Labor requirements.
- F. Assisting in monitoring contractors and subcontractors during and after construction for compliance with HUD regulations.
- G. Acting as mediator in disputes between subrecipient and contractor.
- H. Providing CDBG, HOME, and ESG application workshops for non-profit organizations.
- I. The HUPD will provide the same TA described in A through H, whenever possible, for all Emergency/Special Grants.

Plans to Minimize Displacement of Persons and to Assist any Persons Displaced.

Broward County in accordance with the Uniform relocation Assistance and real Property Acquisition Policies Act of 1970, the 1988 Common Rule, and the 1989 Barney Frank Act, will provide relocation assistance, as described in 24 CFR 570.606(b)(2), to each low/moderate-income household displaced by the demolition of housing or by the conversion of a low/moderate-income dwelling to another use as a direct result of assisted activities.

Consistent with the goals and objectives of activities assisted under the Act, Broward County will include, but not be limited to, the following steps to minimize the displacement of persons from their homes:

1. Avoid, as much as possible, Action Plan funded projects which permanently displace persons from their homes.
2. Fully advise any residents who may be displaced of their rights and options for relocation benefits as required by federal regulations.
3. Assist displaced residents in filling out any required forms for assistance or to appeal County decisions regarding displacement or the level of relocation benefits.

Complaints

Citizens wishing to submit a complaint regarding any portion of the citizen participation process and/or development of the CDBG, HOME, and ESG application, Consolidated Plan, Performance Report or amendment to the Consolidated Plan, may do so according to the following procedure:

1. Formal complaints should be submitted in writing to:

Housing and Urban Planning Division
Attention: Director
110 NE 3rd Street, Suite 300
Fort Lauderdale, Florida 33301

The Division Director will refer the complaint to the appropriate county staff member for written response regarding the complaint. The written response will be mailed within fifteen (15) business days of the receipt of the complaint.

2. If the complainant is not satisfied with HUPD's response, the complainant can appeal the decision to the Division Director. The Director will have thirty (30) business days to take further action as deemed necessary to address the complainant's concerns.
3. If complainants are not satisfied with the decision of the Division Director, a written complaint may be submitted to the HUD Regional Office at:

Lori A. Serino, Director, Jacksonville Field Office
Community Planning and Development
U.S. Department of Housing and Urban Development
Charles Bennett Federal Building
400 W. Bay Street, Suite 1015
Jacksonville, Florida 32202

Acting Director, Miami Field Office
Community Planning and Development
U.S. Department of Housing and Urban Development
Brickell Plaza Federal Building
909 SE 1st Avenue
Miami, Florida 33131

Four-Factor Analysis and Language Access Plan (LAP) for Limited English Proficiency Persons

HUD Entitlement Programs: CDBG, HOME, & ESG

Purpose: In compliance with Executive Order 13166, Broward County has developed the following Four-Factor Analysis and Language Action Plan (LAP) for Limited English Proficiency (LEP) persons living in the County.

History: Under Federal law Title VI of the Civil Rights Act of 1964, discrimination was made illegal in programs that received federal financial assistance. In particular for LEP persons, it protects individuals on the basis of their race, color, or national origin. In certain situations, failure to ensure that persons who have LEP can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against race/ethnicity and national origin discrimination.

Persons who, as a result of their race/ethnicity and national origin, do not speak English as their primary language and have limited ability to speak/read/write, or understand English may be entitled to language assistance under Title VI in order to receive County services, benefits, and/or participate in sponsored programs.

Four-Factor Analysis: There is no specific method for ensuring compliance but undertaking a four-factor analysis, adoption of a Language Access Plan (LAP) for vital materials and making necessary translation will be considered “strong evidence” of compliance.

Factor 1: Determine the number or proportion of LEP persons in the eligible service population. HUD provides the following guidance for what documents should be provided and when:

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more LEP persons in eligible population	Translate vital documents
>5% of eligible population and more than 50 are LEP persons	Translate vital documents
>5% of eligible population and 50 or less are LEP persons	Translated written notice of right to receive free oral interpretation of documents
5% or less of eligible population and less than 1,000 are LEP persons	No written translation required

Factor 2: The frequency with which LEP persons come in contact with the program

Factor 3: The nature and importance of the program, activity, or service

Factor 4: The resources available and costs to the recipient

Examples of language assistance includes but is not limited to oral interpretation, bilingual staff, telephone service lines interpreter, written translation services, notices to staff and recipients about the availability of LEP services; or referrals to community liaisons. When the four-factor analysis is complete the jurisdiction should produce a Language Access Plan and follow thru with the plan.

Factor 1: Size of LEP Population

Overall, Broward County has a significant limited English proficiency population that may require translation services. In 2018, an estimated 289,349 individuals spoke English less than “very well.” The most common primary language spoken by LEP residents is Spanish. Given the large Hispanic population (over 25%) it is unsurprising that Spanish speaking households are very prevalent. Approximately 187,252 LEP residents speak Spanish, which is 65% of the LEP population. Additionally, 81,727 LEP residents primarily speak Indo-European languages, 14,288 speak Asian and Pacific Island Languages, and 6,082 speak other languages.

Due to the importance of HUD programs and the universal availability of some programs the entire jurisdiction was analyzed. Additional four-factor analyses should be conducted on a program basis with a more limited geographic range.

TABLE: Primary Language and Limited English-Speaking Households

Language	Primary Language Spoken at Home		Limited English-Speaking Households		
	#	%	#	% of Total Households	% of Prim. Home Lang.
Population 5 years and over	1,797,580	--	289,349	16.1%	--
Spanish	467,357	26.0%	187,252	10.4%	40.1%
Other Indo-European	209,000	11.6%	81,727	4.6%	39.1%
Asian and Pacific Island	30,351	1.7%	14,288	0.1%	27.1%
Other	25,261	1.4%	6,082	<0.1%	24.1%

Source: 2014-2018 American Community Survey 5-Year Estimates (S1601)

Factor 2: Frequency of Contact

Housing services require ongoing communication and needs to be available throughout the year. Depending on the program specifics, procedures will vary as detailed in the LAP. Race and Ethnicity beneficiaries are reported in the County's annual Consolidated Annual Performance Report to HUD. In the following table, it shows the composition of households or individuals assisted in Broward County by entitlement program. Hispanic residents make up over half of CDBG participants and nearly one-quarter of HOME program participants.

TABLE: Racial and Ethnic Composition of Households/Individuals Assisted (2018 CAPER)

Race & Ethnic Composition	CDBG		HOME	
	#	%	#	%
White	968	81.6%	78	31.2%
Black or African American	208	17.5%	170	68.0%
Asian	11	1.0%	2	0.8%
American Indian or American Native	0	0%	0	0.0%
Native Hawaiian or Other Pacific Islander	0	0%	0	0.0%
TOTAL	1,187	--	250	--
Hispanic	602	50.7%	60	24.0%
Non-Hispanic	585	49.3%	190	76.0%

Factor 3: Nature and Importance of the Program

Per the "Department of Housing and Urban Development Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons", HUD programs play a critical role in the community and should rank high on the critical/non-critical continuum. The importance will vary depending on each program, but the housing department as a whole is critical.

Factor 4: Available Resources

Given the limited resources available, it is imperative that a cost/benefit analysis is done when considering translation efforts for each program. It is difficult to gauge whether a community's participation (or lack thereof) is due to failed outreach efforts or if they generally do not have a need. However, efforts can be made to show compliance with Title VI.

In general, all documents should be available in Spanish, and it would be incredibly beneficial if a staff member could also serve as a point of contact for the Spanish LEP community. The remainder LEP

populations should be targeted on a project-by-project basis. The jurisdiction should also reach out to community leaders who may be able to provide translation services. Regardless, every language mentioned above should be made aware of their right to a free oral translation of documents upon request.

Conclusion

To assist in showing strong evidence for compliance with Title VI's prohibition against discrimination, Broward County shall produce a thorough Language Access Plan. This plan should provide guidance for the creation of translated documents on a program-by-program basis and for the division as a whole. Particular care should be taken to ensure documents are prepared ahead of time for any disaster relief to minimize delays in service for households harmed by hurricanes or similar natural disasters.

Language Access Plan

As a result of the Four-Factor Analysis, Broward County has determined persons with limited English proficiency who primarily speak Spanish are in-need of language assistance. For this purpose, the County has identified the following types of language assistance to be provided as needed throughout HUD entitlement programs CDBG and HOME:

- All public notices and published citizen participation advertisements will include a statement that services and program materials are available in Spanish upon request.
- All citizen participation notices will include a statement that translators will be available at public meetings upon prior request.
- If needed, a translator may be retained to provide oral translation at public meetings and hearings, and also during the implementation of the project activities (as needed for housing and public services).

Additionally, individual projects shall take into account the LEP populations living within the project area to ensure assistance is provided for LEP residents speaking languages other than Spanish.

Adopted: _____

Chief Elected Official

Date