



Citizen¹ Participation Plan

for City of Iowa City

CDBG & HOME Funding

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¹ While federal law (42 U.S.C. 5301) uses the term “citizen participation plan”, this plan is meant to assist all residents of Iowa City and to encourage all residents to participate.

Section I. Introduction

This Citizen Participation Plan (the “Plan”) sets forth the policies and procedures of the City of Iowa City, Iowa (the “City”) for public participation and seeks to help residents participate in the development and amendment of each Consolidated Plan (most recently *City Steps 2025*), Annual Action Plan (AAP), Consolidated Annual Performance and Evaluation Report (CAPER), fair housing plans, and Citizen Participation Plan (CPP). Note that while federal law (42 U.S.C. 5301) uses the term “citizen participation plan”, this plan is meant to assist all residents of Iowa City and to encourage all residents to participate.

City Steps 2025 and each year’s AAP guide the City’s use of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs, which are made available from the U.S. Department of Housing and Urban Development (HUD). The CAPER provides an assessment of funds expended and a quantitative analysis of program and project outcomes. Fair housing plans, which include the Analysis of Impediments to Fair Housing Choice (AI) and/or Assessment of Fair Housing (AFH) help ensure the City affirmatively furthers fair housing choice.

The consolidated planning process is integrated into the City’s yearly goal-setting and budget process. As such, it provides for resident access designed to encourage participation in developing and implementing plans by the general public, in addition to specifically involving:

-) Low- and moderate-income (LMI) persons;
-) Persons living in LMI neighborhoods (defined as Census tracts and block groups where 51% of persons are LMI);
-) Persons living in revitalization or blighted areas;
-) Persons living in areas where federal funds will be invested; and
-) Residents of public and assisted housing developments.

The Housing and Community Development Commission (HCDC) plays a key role in the resident participation process. HCDC holds public meetings, collects comments, and provides forums for the annual review of the City’s plans and reports. In addition, the City encourages participation by public and private organizations, including local and regional institutions, businesses, developers, nonprofits, philanthropic organizations, community- and faith-based organizations, the Local Homeless Coordinating Board, and the Iowa City Housing Authority. Consultation is further discussed in Section III.

This document is designed to meet HUD’s basic requirements for “citizen participation” in preparing *City Steps* in accordance with Section 104 (a) of the Housing and Community Development Act of 1974, codified at 42 U.S.C. Section 5301, and 24 CFR 91.105, as well as 24 CFR 5 regarding the City’s obligation to affirmatively further fair housing. This plan is a revision of a plan adopted by the City on May 10, 2010 and amended on September 19, 2017.

Section II. Planning and Reporting Process

This section describes the process required for the development of the City's plans and reports. Plans include the Consolidated Plan (City Steps), Annual Action Plan (AAP), Assessment of Fair Housing (AFH), and Citizen Participation Plan (CPP). Reports include the Consolidated Annual Performance and Evaluation Report (CAPER).

A. Public Meetings

Federal regulations at 24 CFR 91 provide requirements for "public hearings" which are substantively similar to the definition and intent of a "public meeting" in Iowa Code Section 21.2(2). Additionally, "public hearings" in State law (Section 21.4(2)(b)) require notice to be published in the newspaper varying days before the public hearing, including as few as one day. To avoid confusion between state and federal terms, this document refers to public *meetings* where the federal regulation above references *hearings*. Notice for meetings is discussed in Section II.B.

The Housing and Community Development Commission (HCDC) shall hold regular monthly public meetings at Senior Center, 28 S. Linn Street, Iowa City, unless otherwise determined and proper notice given, to allow the City to obtain residents' views and to respond to proposals and questions. Together, its meetings shall address housing and community development needs, proposed activities and strategies, actions for affirmatively furthering fair housing, and a review of program performance. Residents may also propose amendments to the documents discussed in this Plan. When developing City Steps or the AFH, the City shall hold at least one meeting before the draft is published for comment to provide information regarding the document, priorities, and proposed activities and to allow residents input regarding the City's housing and community development needs, priorities, strategies, and budget, including efforts to affirmatively further fair housing. HCDC shall also meet and provide recommendations during the development of, or substantial amendment to, City Steps, AAPs, AFHs, or the CPP.

Residents shall have reasonable and timely access to all public meetings. To increase participation in the development and/or amendment of these documents, the City shall provide that these meetings be held at times and locations convenient to potential and actual beneficiaries. It shall also provide reasonable accommodation for persons with disabilities and non-English speaking residents as discussed in Section III.D. The City shall take minutes of all public meetings and make them available for public review as discussed in Section III.A.

B. Public Notice

The City shall send notice of HCDC's public meetings to the media in accordance with the Iowa Open Meetings Law and shall post notice on the City Clerk's Bulletin Board located on the First Floor of City Hall, 410 East Washington Street, Iowa City. The City shall also make the agenda available online at www.icgov.org and at the place of the meeting.

In addition, the City shall publish notices in one or more newspapers of general circulation to announce public comment periods and public meetings of City Council prior to the adoption of or amendment to the City's plans, as discussed in Sections II.C and II.D and summarized in Table 1. These notices shall include a brief summary of the relevant plan, and information on where to find "draft" copies of the document for review prior to the meeting. The complete document shall be available as outlined in Section III.A.

C. Development and Adoption

1. Planning Documents

At least every five years, the City shall prepare and adopt a five-year Consolidated Plan (most recently *City Steps 2025*) which outlines proposed housing and community development needs, priorities, and goals; locations; budgets; and scope of activities to be funded by the City's CDBG and HOME programs. It includes the following major components:

1. A process summary including public input obtained during the Plan's development;
2. A needs assessment for housing, homeless, special needs, and community development;
3. A market analysis for housing and for community development assets; and
4. A strategic plan including geographic and need priorities, anticipated resources, goals, and the scope of expected activities.

Each year, as part of the consolidated planning process, the City shall also prepare and adopt an AAP which includes specific information on the proposed use of CDBG and HOME funds for housing, jobs and services for LMI persons. The AAP outlines proposed activities, project locations, budgets and the scope of activities being funded for the following year.

The City shall submit Consolidated Plans and AAPs to HUD at least 45 days before the start of its program year; this corresponds to the City's fiscal year from July 1 to June 30. This deadline is May 17 in most years, but it may be delayed depending on HUD direction. In no event will these documents be submitted later than August 16.

Prior to final action by City Council, the City shall provide residents notice and an opportunity to comment for a period not less than 30 days, to allow residents, agencies, and other interested parties a reasonable opportunity to examine the documents and related materials. Prior to adoption of a Consolidated Plan, AAP, or AFH, City Council will hold a public meeting as outlined in Section II.A. The City shall provide notice as identified in Section II.B and summarized in Table 1. The City shall consider any comments or views of residents received in writing or orally at the public meeting. The City shall summarize these public comments or views, and a summary of any comments or views not accepted and the reasons why, and shall attach them to the Consolidated Plan or AAP as part of its submission to HUD.

2. Performance Reports

Each year, the City shall prepare a CAPER that identifies the final budget expenditure and performance results for each AAP project and activity from the most recently completed program year, in addition to any outstanding activities from prior program years. The City shall submit this CAPER to HUD within 90 days after the close of the City's program year (September 28).

Prior to submission to HUD, the City shall provide residents notice and an opportunity to comment for a period of not less than 15 days, after which HCDC shall hold a public meeting as outlined in Section II.A. Notice shall be provided as identified in Section II.B and summarized in Table 1. The City shall consider any comments or views of residents received in writing or orally at the public meeting. The City shall summarize these public comments or views, and a summary of any comments or views not accepted and the reasons why, and shall attach them to the CAPER as part of its submission to HUD.

D. Amendment

City Council, HCDC, City staff, subrecipients, or residents may propose amendments to the City's plans and reports in writing or at public meetings. Amendments to the Consolidated Plan (City Steps), AAP, CPP, and AFH may be "Substantial" or "Administrative." The City uses the criteria below to determine what changes in the City's planned or actual activities constitute a substantial or administrative amendment. Upon completion of any amendment, the City shall make the amendment public and submit a copy of each amendment to HUD as it occurs, or at the end of the program year.

1. Substantial Amendments

Substantial amendments to City Steps, AAPs, AFH (referred to as "revisions" in 24 CFR 5), and the CPP shall be approved by Resolution of City Council as necessary or appropriate after review and recommendation by HCDC. All amendments shall be consistent with HUD requirements.

Prior to Council action, the City shall provide residents notice and an opportunity to comment for not less than 30 days to allow residents, public agencies, and interested parties a reasonable opportunity to examine the materials. Prior to adoption of a substantial amendment, Council shall hold a public meeting as outlined in Section II.A. Notice shall be provided as identified in Section II.B and summarized in Table 1. The City shall consider any comments or views of residents received in writing or orally at the public meeting. The City shall summarize these public comments or views, and a summary of any comments or views not accepted and the reasons why and shall attach them to the substantial amendment as part of its submission to HUD.

Substantial Amendments to City Steps, AAPs, the CPP and/or, AFH shall be required only whenever the City seeks to:

-) Make a change in its allocation priorities or a change in the method of distribution of funds.
-) Carry out a project using funds from any program covered by City Steps not previously described in the AAP (including program income, reimbursements, repayment, recaptures, or reallocations from HUD).
-) Change use of federal funds from one eligible activity to another
-) Change the location of a project that is "neighborhood specific" or in a designated urban revitalization area (e.g., to eliminate slum and blight) to areas beyond that neighborhood.
-) Change the purpose of a project with respect to the objectives as originally described in City Steps, such as a change in the type of project or its ultimate objective (e.g., canceling an economic development project and allocating those funds to a housing project).
-) Increase a project budget by more than \$50,000 or by more than 25% of the original budget allocations, whichever is greater.
-) Reduce the number of assisted beneficiaries or affordable housing units by more than fifteen (15) or by more than 25% of the original number, whichever is greater.
-) Make a change to the Citizen Participation Plan
-) Revise the AFH upon HUD's written notification specifying that a material change requires such a revision. A material change occurs if circumstances affect the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances.

In Event of Emergency

In the event of a local, state or federally declared emergency or major disaster where CDBG or HOME funds may be expended to carry out eligible activities as part of the City's response, the City's amendment requirements for the Consolidated Plan and/or AAP will be streamlined by reducing the public comment and display period to 5 days. A minimum of one public meeting shall still be held to receive comments on the Revised Consolidated Plan and/or AAP, after which revised document will be presented to City Council for consideration and formal action. Upon Council approval, the revised document will be submitted to HUD.

2. Administrative Amendments

Administrative Amendments may be approved by the City Manager or his or her designee. Changes in financial terms shall be reviewed and approved by the City Manager or his or her designee. The City Manager may request HCDC to provide a recommendation to Council for consideration and approval. Administrative amendments may include but are not limited to:

- J Canceling an existing activity or program if no funds were expended.
- J Updating the amount of prior year HOME or CDBG program income, which was unknown at the time of drafting the APP.
- J Transferring a funded activity from one approved grant year to another to facilitate the efficient use of CDBG and HOME funds. (e.g., using uncommitted FY2017 CDBG grant funds to fund an activity that was awarded FY2018 CDBG grant funds).
- J Funding activities for administration, economic development, public services, Community Housing Development Organizations, housing rehab, or neighborhood improvements.
- J Amending existing agreements with grant recipients, so long as they do not trigger a need for a substantial amendment.
- J Changing the location of a project that is not "neighborhood specific" or in a designated urban revitalization area.
- J Changing the purpose of an activity with respect to the objectives as originally described in the Annual Action Plan or funding application.
- J Increasing a project budget by \$50,000 or less or by 25% or less of the original budget allocation, whichever is greater.
- J Reducing the number of beneficiaries or housing units being assisted by fifteen (15) or less or by 25% or less, whichever is greater.
- J Decreasing a project budget if the work is completed or increasing the number of beneficiaries or housing units being assisted.
- J Making typographical, grammatical, clarificatory, or technical corrections that do not trigger a substantial amendment.
- J Modifying City Steps, AAPs, AFHs, or CAPERs per HUD's requests following submission to HUD, so long as it does not trigger a substantial amendment.

Table 1: Summary of Notice, Comment, and Meeting Timelines

	Public Notice	Comment Period	Public Meeting
Citizen Participation Plan	Publication will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available.	30-day public comment period	In conjunction with public hearing for Consolidated Plan, publish notice online and in Press-Citizen.
Substantial Amendment	Publication will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available.	30-day public comment period	Prior to implementing the substantial amendment, may be held in conjunction with public hearings for Annual Action Plan. Publish notice online and in Press-Citizen.
Consolidated Plan/Annual Action Plan	Publication will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available. Will also include the amount of assistance expected, range of activities undertaken, estimated amount that will benefit low/mod income residents.	30-day public comment period	During the planning process to receive comments on the housing and community development needs and during the development of proposed activities. Publish notice online and in Press-Citizen.
Substantial Amendment	Publication will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available.	30-day public comment period	Prior to implementing the substantial amendment, may be held in conjunction with public hearings for Annual Action Plan. Publish notice online and in Press-Citizen.
Admin. Amendment	May be requested at City Manger's discretion.	Not applicable	May be requested at City Manger's discretion.
Assessment of Fair Housing	Publication will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available.	30-day public comment period	Prior to submission to HUD. Publish notice online and in Press-Citizen.
Substantial Amendment (Revision)	Publication will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available.	30-day public comment period	Prior to submission to HUD. Publish notice online and in Press-Citizen.
AFH Data	At or as soon as possible after the start of the public participation process, data will be made available on the City's website by linking to HUD's website.	Not applicable	Not applicable
CAPER	Publication will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available.	15-day public comment period	Prior to submission to HUD. Publish notice online and in Press-Citizen.

Section III. Resident Access

The City is committed to making reasonable and timely access to the consolidated planning and fair housing planning processes for all members of the community, especially LMI persons. The following efforts illustrate measures that should be considered to provide resident access to these processes. Failure to use any one of these shall not be considered a violation of this Plan.

A. Information and Records Availability

The City shall publish plans and reports in a manner that affords residents, public agencies, and other interested parties a reasonable opportunity to examine each document's content and to submit comments. Plans and reports as proposed, adopted or amended - City Steps, AAPs, CAPERs, AFHs, and this CPP – in addition to relevant public meeting minutes, shall be available online at www.icgov.org/actionplan and in print format upon request for public review during regular working hours at:

Neighborhood and Development Services
City of Iowa City
410 E. Washington Street
Iowa City, IA 52240
319-356-5230
neighborhoods@iowa-city.org

The Neighborhood Services Division has additional information and HUD-provided data available for public review in print format upon request during regular working hours, including:

-) Amount of assistance the City expects to receive from grant funds and program income;
-) Range of eligible activities that may be undertaken;
-) Estimated amount of funds anticipated to benefit LMI persons;
-) Uniform Relocation Act, which regulates public responsibility and actions associated with the displacement of persons resulting from a HUD- funded project;
-) Records relating to plans and reports, and the City's use of assistance during the preceding five (5) years; and
-) Policies guiding the administration of HOME- and CDBG- funded programs.

As soon as feasible after starting the public participation process for an AFH, the City shall make HUD-provided and supplemental information to be incorporated into its AFH available to residents, agencies, and other interested parties by referencing HUD's website. The City shall make summary materials of plans and reports available without charge. Up to ten (10) free copies of *City Steps 2025* will be made available, and upon request, a free copy will be provided to each individual or organization until the supply is exhausted. Photocopier charges and miscellaneous charges for other related services and materials shall be assessed in accordance with the City's Open Records Policy. Special accommodations shall be provided as discussed in Section III.D.

Requests for additional information may be made to the Neighborhood Services Coordinator at the contact information listed above. A response shall be provided within five (5) working days of receipt of the request, where practicable.

B. Consultation

When preparing or amending the consolidated plan and/or AFH, the City shall consult with the general public and make information available as detailed in Section III.C, in addition to consulting with public and private agencies that provide assisted housing or health and social services (including those focusing on children, elderly persons, persons with disabilities, persons with HIV/AIDS, and homeless persons), community- and regionally-based organizations representing protected class members, and organizations that enforce fair housing laws. The following list illustrates possible organizations to be consulted:

General

-) Community groups
-) Neighborhood organizations
-) Religious Organizations
-) Residents of Iowa City

Housing

-) Builders of Hope
-) Iowa Valley Habitat for Humanity
-) Iowa City Home Builders Association
-) Iowa City Housing Authority
-) Iowa City Area Association of Realtors
-) Johnson County Affordable Homes Coalition
-) Mayor's Youth Empowerment Program
-) Residents of public and subsidized housing
-) Successful Living
-) Systems Unlimited
-) The Housing Fellowship

Public Services

-) Abbe Center for Community Mental Health
-) Access2Independance
-) Arc of Southeastern Iowa
-) Big Brothers, Big Sisters of Johnson County
-) Community Coordinated Child Care (4Cs)
-) CommUnity Crisis Services and Food Bank
-) Department of Human Services
-) Four Oaks
-) Free Lunch Program
-) Horizons, A Family Service Alliance
-) Inside Out Re-Entry Community
-) Iowa City Free Medical/Dental Clinic
-) Johnson County Public Health
-) Neighborhood Centers of Johnson County
-) Pathways
-) Prelude Behavioral Services
-) Rape Victim Advocacy Program
-) Table to Table

Homelessness

-) Regional lead for the Iowa Balance of State Continuum of Care
-) Domestic Violence Intervention Program
-) Hawkeye Area Community Action Program, Inc.
-) Local Homeless Coordinating Board
-) Shelter House
-) United Action for Youth

Fair Housing

-) City of Iowa City Office of Equity & Human Rights
-) Diversity Contact List, as prepared by the Iowa City Office of Equity & Human Rights
-) University of Iowa Equal Opportunity and Diversity Office

Education and Employment

-) Chamber of Commerce
-) Center for Worker Justice
-) Iowa City Community School District
-) Iowa Workforce Development
-) Kirkwood Community College
-) Small Business Development Center
-) University of Iowa

Broadband

-) Cable 4
-) CenturyLink
-) ImOn Communications
-) Mediacom

Flooding, public land and water, and emergency management

-) Joint Emergency Communications Center
-) City of Iowa City Development Services

The City also should consult with adjacent local and regional governments and agencies, particularly regarding problems and solutions that go beyond City boundaries. The following governmental agencies within the region should be consulted:

-) City of Iowa City
-) City of Coralville
-) City of University Heights
-) City of North Liberty
-) City of Tiffin
-) Johnson County
-) East Central Iowa Council of Governments
-) Metropolitan Planning Organization of Johnson County

Consultation during the development of the Consolidated Plan or AFH should utilize a mix of strategies which may include but are not limited to surveys, expert interviews, stakeholder groups, public meetings, and public comment periods. This will allow the City to obtain information regarding community needs, existing services to meet those needs, and their assessment of any gaps in meeting those needs, including new strategies to address outstanding needs.

C. Public Promotion

After the adoption of each Consolidated Plan, AAP, and AFH by City Council, activities and projects funded in the plan shall be actively promoted to ensure full access to and utilization of funds as budgeted. The Neighborhood and Development Services Department shall have primary responsibility for activity promotion; however, other City departments and subrecipients shall be responsible for ensuring reasonable and timely promotion and access to the projects, programs and services made possible by CDBG, HOME and other HUD funding. The following methods illustrate ways to publicly promote such activities:

Mailing List (including electronic mailing lists): Develop and utilize existing mailing lists of interested parties, adjacent local governments, religious organizations and public and private agencies that provide affordable housing, assisted housing, economic development, business assistance, health services and social services and use to send summary information, public meeting or comment period notices. For an illustration of such groups, see Section III.B.

Community Development Week: Use this national recognition week to promote local success stories related to CDBG, HOME, and other community development funding activities. This may include awards, special project open houses, keynote speakers, and neighborhood walks with City Council members, or other promotional activities.

City Government Channel: Create and run public service announcements about the CDBG and HOME programs and the consolidated planning and fair housing planning processes to inform, educate, and promote resident participation.

Media: Use media releases about consolidated planning and fair housing processes and resident participation opportunities throughout the CDBG/HOME program year.

City Website: Use this electronic format to publicize public meeting participation opportunities and to highlight development, implementation, and monitoring as it relates to consolidated planning and fair housing planning processes (www.icgov.org).

D. Special Accommodations

The City shall provide residents with reasonable and timely access to all meetings, consistent with accessibility and reasonable accommodation requirements, in accordance with section 504 of the Rehabilitation Act of 1973 and the regulations at 24 CFR 8; and the Americans with Disabilities Act and the regulations at 28 CFR 35 and 36, as applicable. All public meetings shall be held with accommodation for persons with disabilities. In addition, the City shall provide additional special accommodations upon request:

-) The Citizen Participation Plan in a format accessible to persons with disabilities (e.g., providing oral, Braille, electronic, or large print copies for the visually impaired).
-) An interpreter at public meetings for non-English speaking persons or persons with hearing impairments.
-) Translation through Language Line, an over-the-phone interpreter service, that can translate English into more than 140 languages.
-) Outreach to non-English speaking residents based on the City's evaluation of the most commonly spoken second languages.
-) Translated materials as detailed in the Language Access Plan for Neighborhood Services.

Requests for disability-related accommodations to participate should be submitted to *neighborhoods@iowa-city.org* or 319-356-5230. For public meetings, requests for interpretation or other special accommodations must be submitted no less than five (5) working days before the meeting. Early requests are strongly encouraged to allow sufficient time to meet access needs.

E. Technical Assistance

Technical assistance shall be provided to groups representative of LMI persons that request such assistance in developing proposals for funding under any of the activities covered by the Consolidated Plan or AFH. The level and type of assistance provided shall be on a case-by-case basis as determined by the City Manager or their designee and shall be subject to budgeted resources authorized by the City Council.

The City shall also provide ongoing technical assistance to applicants, subrecipients, and interested parties as to how to successfully apply for and/or manage HOME and CDBG projects.

Section IV. Consistency with Plans

A. Section 108

Applications for assistance filed by the City for Section 108 loan guarantee assistance authorized under HUD regulation 24 CFR 570, Subpart M, are subject to all provisions set forth within this CPP. Such applications for Section 108 loan guarantee assistance may be included as part of the process for obtaining CDBG/HOME Entitlement funds, or may be undertaken separately anytime during the program year. The required public meeting to inform residents of program requirements will be carried out by the City's Neighborhood and Development Services Department.

B. Consistency Determinations

For certain HUD competitive programs, a Certificate of Consistency with the City's approved Consolidated Plan may be required for an application, whether the applicant is the City or another organization. This will occur if a project is located in the City. The City's certification that an application is consistent with its Consolidated Plan means the City's plan shows need, the proposed activities are consistent with the City's strategic plan, and the location of the proposed activities is consistent with the geographic areas specified in the plan.

Certificates of Consistency may be signed by the City Manager upon request. If denied, the City shall provide the reasons for the denial in writing within fifteen (15) work days after a request is received.

C. Anti-Displacement and Relocation

Federal regulations require the City to set forth its plans to minimize displacement of persons, even if no displacement is expected to occur, and to state how this information is available.

Iowa City's programs minimize displacement by following the City's "Residential Anti-Displacement and Relocation Assistance Plan for Community Development Block Grant, HOME Investment Partnership, and Section 108 Loan Guarantee Programs" adopted in Resolution 93-312. This document is available for public review at Neighborhood and Development Services, 410 East Washington Street, Iowa City.

Section V. Complaints Procedure

Resident complaints related to the Consolidated Plan, Annual Action Plan, Assessment of Fair Housing, Consolidated Annual Performance and Evaluation Reports, Citizen Participation Plan, and/or amendments thereto shall be handled in the following manner:

- a. The Neighborhood Services Coordinator shall accept complaints at any time during the course of the CDBG/HOME program year. Although verbal complaints will be accepted, only written complaints will be responded to in writing.
- b. Written complaints shall contain a concise statement of the complaint and an explanation of the action desired.
- c. Complaints shall be investigated and responses to written complaints shall be made within fifteen (15) working days, where feasible, after a complaint is received.
- d. Copies of the complaint and the response shall be forwarded to the City Manager.

With limited exception, written complaints and the staff response to said complaints are open records under Iowa law.

Should the complainant not be satisfied with the response, the aggrieved person(s) may submit a complaint to the HUD Omaha Field Office at US Department of HUD, Edward Zorinsky, Federal Building, Suite 329, 1616 Capitol Avenue, Omaha, NE 68102-4908.